



King County

Kathy Lambert

Councilmember, District 3

Metropolitan King County Council

August 16, 2021

Eleanor Ott, P.E.
Washington State Department of Ecology
PO Box 47696
Olympia, WA 98504-7696

Dear Eleanor Ott,

As a member of the King County Council, I am writing to express my concerns about the Washington State Department of Ecology's (Ecology) draft Puget Sound Nutrient General Permit (PSNGP) for municipal wastewater treatment facilities that discharge into Puget Sound. It is my belief that Ecology's issuance of a PSNGP is premature and needs more work before it can be successfully implemented. I respectfully request that Ecology delay the issuance of the PSNGP until the modelling of nutrient inputs to Puget Sound is well understood, the limited data available is fully evaluated, and alternatives have been explored.

King County has a longstanding commitment to using science-based decisions to preserve our environment and fight climate change. From our King County Strategic Climate Action Plan (which was just renewed), to our Clean Water Healthy Habitat Strategic Plan, to our land conservation initiative, King County has committed to invest billions in the next decade to water quality, habitat preservation, and reducing greenhouse gases. A portion of these investments are essential to maintaining existing infrastructure and the remainder are being deployed through partnerships with Tribes, cities, and community-based organizations to create a resilient system that achieves immediate and long-term results. A highly prescriptive approach to implementing the PSNGP would oblige King County to allocate resources to a single action and thereby limit our ability to invest funds in a variety of areas where they will have the greatest impact.

As a Councilmember, I am responsible for representing the interests of residents and businesses in King County and it is critically important that the potential impacts of the PSNGP on cost and delivery of essential services, such as wastewater treatment, are fully evaluated and understood. As Chair of King County's Regional Water Quality Committee, I have been able to sit in on several committee briefings from Ecology staff and our own internal policy staff but there are still underlying questions and concerns that have not been addressed. I recognize Ecology's responsibility to maintain compliance with water quality standards and to address dissolved oxygen (DO) impairment in sensitive areas of the Sound, and I share Ecology's goal to maintain the health of Puget Sound. However, I do not believe there is adequate information to be assured

that this substantial investment of rate-payer money will yield commensurate benefits to the health of Puget Sound.

I ask that Ecology assess the economic impacts of the PSNGP to ensure decision-makers are well informed on what the costs to residents and businesses will be. Residents and businesses served by King County wastewater treatment facilities could see rate increases up to three times greater than current rates to comply with the PSNGP as proposed. The draft permit as proposed would have significant impacts on ratepayers with sharp escalations beginning in 2023. Rate increases of this magnitude will create significant burdens for our residents, especially low-income residents, and businesses. It is imperative that we maintain affordability in our region and limit displacement of working- and middle-class families, while also working to preserve our environment.

As our nation's second largest marine estuary, I strongly support the protection and restoration of Puget Sound, but I am not convinced that Ecology has not fully explored alternatives that would lead to a greater water quality benefit. Nitrogen removal is a huge investment for this region, and it is crucial that the steps taken achieve the most impactful water quality benefit as quickly as possible. I do not yet believe there is sufficient information to justify such a significant investment to residents and business owners.

I appreciate your time and thank you in advance for your consideration of my comments. If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Kathy Lambert". The signature is written in a cursive, flowing style.

Kathy Lambert
King County Councilmember, District 3