

## **NORTHSHORE UTILITY DISTRICT**

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August 12, 2021

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

**RE: Department of Ecology's Puget Sound Nutrient General Permit**

I am writing to provide comment on Department of Ecology's (Ecology) proposed draft Nutrient General Permit for municipal wastewater treatment facilities that discharge into Puget Sound. I had the opportunity to participate in the Puget Sound Nutrient General Permit Workshop & Hearing held on July 12. I appreciate having the opportunity to speak at the hearing on behalf of Northshore Utility District (NUD) and its constituents.

NUD is a special purpose district that provides wastewater collections to over 85,000 people residing within the cities of Kenmore, Kirkland, Bothell, Lake Forest Park and Woodinville. NUD's wastewater collection system is conveyed to King County's regional treatment facilities.

During the workshop there were several references made by Ecology stating that new permit conditions will likely require "significant financial investments" of treatment processes to comply with the new permit requirements. It's NUD's understanding that these investments will cost several billion dollars just on King County's system alone.

I (we) do not have the scientific expertise to fully understand and comprehend Ecology's modeling assumptions and results. It certainly is a complex issue with countless variables that warrant further consideration. Given the financial impacts facing our region it seems clear and prudent to invest more time to verify and further research the issue, including the exploration of removal technologies and effectiveness.

NUD supports efforts to improve water quality in and around the Puget Sound. It appears there are significant concerns related to research and investigation results of wastewater treatment plant contributions to the nutrient issue. It also appears that there are numerous questions on whether the proposed regulations would have a noticeable improvement on the overall health of the sound.

I (we) understand that Department of Natural Resources and Parks (DNRP) is currently conducting a study on how wastewater treatment plant effluent affects juvenile Chinook salmon in the Puget Sound.

As environmental stewards it seems appropriate that a full comprehensive assessment be conducted and include consideration of the DNRP report, particularly given the financial and environmental impacts related to these issues.

NUD customers, and those of the region, are already experiencing severe impacts from COVID-19 pandemic. It is highly concerning to impose additional burden on residents and businesses without fully exploring the most cost-effective solutions available.

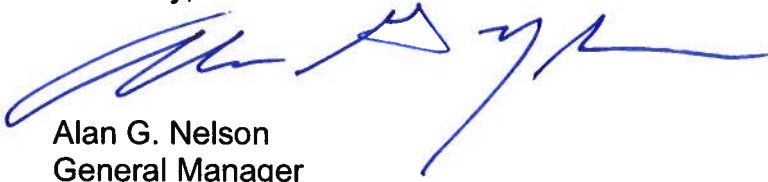
Is there an objection to having a panel of independent experts conduct additional analysis to confirm assumptions and modeling results, and if so – why?

Is there an objection to Ecology forming a group of representatives consisting of system experts and stakeholders to develop a regional plan that addresses nutrients and other issues which adversely affects the Puget Sound, and if so - why?

NUD respectfully request Ecology to extend its nutrients general permit schedule to allow time to fully analyze the issue and implement comprehensive and collaborative strategies that focuses on best solutions.

Thank you in advance for your consideration and response.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Alan G. Nelson', is written over the typed name and title.

Alan G. Nelson  
General Manager

Cc: Board President Matt J. Breyse  
Board Secretary D. Bruce Gardiner  
Commissioner Trudy C. Rolla  
Commissioner Thomas D. Mortimer  
Commissioner Suzanne Greathouse