

VIA ONLINE COMMENTS FORM (PDF)

August 4, 2021

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

Re: Draft Puget Sound General Nutrient Permit

To whom it may concern:

I am offering comments on behalf of the Sammamish Plateau Water and Sewer District (SPWSD) regarding the draft Puget Sound General Nutrient Permit (PSGNP).

SPWSD is a Title 57 Water and Sewer District which provides utilities to its customers located in the Cities of Issaquah and Sammamish, and unincorporated King County. The District has approximately 19,500 water customers and approximately 13,000 sewer customers. Our District continues to grow and add customer base as the East King County region urbanizes. The District is one of 32 agencies which contract with King County for regional wastewater treatment on behalf of our customers. Our mission is *"To provide safe, reliable, and efficient water and sewer services while being leaders in the planning and practice of fiscal and environmental stewardship."* Given the District's contractual reliance on King County and resulting effluent discharged to the Puget Sound, and our mission statement, the District has standing to comment, and interest in the impacts the draft permit may have on our customers.

The District recognizes that that land use and urbanization can adversely impact our environment and the Puget Sound ecosystem. Many factors and variables influence the degree to which our human footprint affects the environment. As such, we can't deny or minimize our impacts and responsibility to mitigate them for future generations, including actions necessary for Puget Sound recovery.

While SPWSD is not a direct party to the proposed PSGNP, as an agency contracting with King County, the District and its customers will ultimately bear the cost of compliance with the PSGNP imposed upon King County related to wastewater treatment and effluent management. As a result, and given the anticipated cost of compliance, it's imperative that the draft permit requirements be science based and confirmed, including peer/third party review and validation. The District asks that the permit not be finalized until a peer/third party review be completed. Permit requirements should encompass a holistic approach to nutrient management in Puget Sound so that all generators and origins of nutrient impacts share equal responsibility for discharge abatement. Confirming source generators, such as storm water, agricultural contributors, and land use factors should be part of the overall approach to nutrient management. The District has concerns that an inordinate responsibility for abatement and cost should not be imposed purely on operators and customers of urban wastewater utilities. It would also be helpful to confirm the source of nutrients entering the wastewater treatment train so that

other abatement measures could be considered so the cost burden may be assigned to the actual source generators. Science and environmental analysis should be applied to identify all sources and equitably assign responsibility for abatement actions. The science should also consider realistic and attainable abatement objectives.

Thank you for the opportunity to comment on the draft PSGNP.

Sincerely,



John C. Krauss
General Manager

cc: Sammamish Plateau Water Board of Commissioners
Kamuron Gurol, King County Wastewater Treatment Division Director