

July 22, 2021



City of Bothell™

Eleanor Ott, P.E.
Washington State Department of Ecology
PO Box 47696
Olympia, WA 98504-7696
<https://wq.ecology.commentinput.com/?id=QFkVE>

Dear Ms. Ott:

I am writing to share the City Bothell's 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 our opinion that Ecology's issuance of a PSNGP is premature and needs much more work before it can be implemented successfully. We request that Ecology delay the issuance of the PSNGP until the modelling of nutrient inputs to Puget Sound is well understood, the limited available data is fully evaluated, alternatives have been explored, and the associated costs and impacts to affordable utility rates have been evaluated.

The City of Bothell sewer utility strives to provide safe, affordable, and equitable wastewater collection and conveyance prior to wholesale treatment by the King County Wastewater Treatment Division and discharge to Puget Sound. The City's sewer systems is relatively new, with the majority installed or upgraded within the last few decades, and does not incorporate stormwater discharge that can lead to Combined Sewer Overflow (CSO) events and associated release of nutrient rich effluent into Puget Sound. Bothell maintains a rigorous sewer system maintenance and improvement program to reduce Infiltration and Inflow, along with water conservation measures and stringent construction inspection that directly reduce wastewater discharge flow rates. In addition, the City has invested significantly in Capital Projects to further improve the sewer system including installation of 0.8 miles of Cure In Place Pipe (CIPP) sewer main rehabilitation in 2019 and reconstruction of all of City's sewer lift in the last 10 years with updated pumps, back-up generators, and redundant systems to ensure zero overflows into the natural ecosystem. Bothell is already invested heavily in sewer utility improvements to decrease potential service and environmental impacts. Issuance of the draft PSNGP requirements will result in an unreasonable economic burden on the City's sewer utility and ratepayers.

The City recognizes Ecology's responsibility to maintain compliance with water quality standards and to address dissolved oxygen (DO) impairment in sensitive areas of the Sound. The City shares Ecology's goal; however, we do not have sufficient information to support the PSNGP as proposed by Ecology.

The science does not support issuance of the PSNGP at this time. There remain significant scientific uncertainties associated with understanding DO depletions in Puget Sound and use of the Salish Sea Model as the tool to support regulatory requirements. The Puget Sound is a complex ecosystem that needs to be studied and evaluated by a body of experts. Additionally, Ecology has not fully considered the environmental trade-offs, such as the increase in greenhouse gas emissions that occurs with increased nitrogen removal.

Eleanor Ott, P.E.

July 22, 2021

Page 2 of 2

The PSNGP, as proposed by Ecology, will have significant economic impacts on residents and business owners in this region. Ecology needs to assess the economic impacts of the PSNGP to ensure decision-makers are well informed on what the costs to residents and businesses will be. City of Bothell residents and businesses served by King County wastewater treatment facilities could see rate increases three times greater than current rates to comply with the PSNGP as proposed. Given the regional need to tackle stormwater, habitat restoration, and other actions necessary for Puget Sound recovery, Ecology should recognize the cost of all of these environmental projects and prioritize those projects with the greatest water quality benefit.

King County is already not affordable for many residents and businesses. We have complied with the Growth Management Act and focused growth within the urban growth boundary, resulting in dense urban neighborhoods and significant investment in sewer utility infrastructure and associated maintenance. Significantly increased sewer rates resulting from the draft PSNGP requirements could cause residents to move elsewhere and businesses to relocate. We do not want to see any further displacement. We want to maintain affordability for residents and businesses in this region.

Ecology should fully explore alternatives. Ecology should explore alternative approaches to improving Puget Sound water quality. For example, an alternative approach should initially focus on shallow bays where dissolved oxygen is most problematic. This would be faster and achieve the most impactful water quality benefit more quickly. Nitrogen removal is a huge investment for this region. We strongly support the restoration of Puget Sound, but Ecology has not fully explored alternatives that would lead to a greater water quality benefit. We do not have sufficient information yet from Ecology to justify this kind of significant investment to residents and business owners.

Thank you in advance for your consideration of our comments. Again, I want to emphasize the importance of delaying issuance of the PSNGP until the modelling and data on nutrients are well understood, the alternatives fully evaluated, and the economic impacts better understood. If you have any questions, please feel free to contact Interim Public Works Director Eddie Low anytime at eddie.low@bothellwa.gov.

Sincerely,



Erin Leonhart
Interim City Manager

cc: Bothell City Council