



## City of Bellevue

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

August 12, 2021

Subject: Washington State Department of Ecology's draft Puget Sound Nutrient General Permit

Dear Ms. Ott:

The City of Bellevue (Bellevue) supports Ecology's goal to improve water quality in Puget Sound for a healthy marine environment and human use and enjoyment. Bellevue has a long history of partnering with Ecology to improve the quality of our local surface waters.

However, regarding the draft Nutrient Permit (Permit) we ask that Ecology perform additional due diligence, including performing more scientific and cost analyses. Bellevue respectfully requests that Ecology pause its process and include the following actions before issuing new regulations.

**Further scientific analyses and data collection would strengthen the basis for the Permit conditions and its expected outcomes.** Bellevue encourages Ecology to (1) finalize the draft Nutrient Management Plan, (2) engage additional third-party experts to validate the science, and (3) develop more effective alternatives that will result in maximum reductions to nitrogen loads to Puget Sound. It is Bellevue's understanding that focusing on reducing nutrient concentrations in wastewater treatment plant discharges may address only a small fraction of the sources contributing nitrogen to surface waters. Additional study would allow for a broader suite of solutions and alternatives to increase dissolved oxygen in Puget Sound.

**The Permit costs will have significant impacts on affordability and may impact Bellevue's ability to comply with the Growth Management Act (GMA).** The Permit will cause unprecedented rate increases to our customers for uncertain improvements to water quality. Bellevue therefore strongly advocates for Ecology to conduct economic analyses of the costs to comply with the Permit.

King County's current estimate to comply with the Permit will increase its sewer capital costs by as much as \$21.4 billion. The city contracts with King County for wastewater treatment services. Payments to King County for this service are the single largest cost driver for Bellevue's Sewer

Utility, accounting for about 56 percent of its annual expenditures. Excluding any new costs related to the Permit, the city's payment is projected to increase from \$36 million in 2021 to \$81 million in 2035. Additional costs related to the Permit would increase Bellevue's payment to \$189 million in 2035. This would result in a 245 percent rate increase to Bellevue residents and businesses by 2035. Bellevue's current typical residential monthly sewer bill is \$89 and would increase to \$307 in 2035. The Permit could make essential sewer services potentially unaffordable for many in our community.

Bellevue is working diligently to meet its share of the region's growth targets by adding 35,000 housing units and 70,000 jobs by 2044. While King County's treatment plants have the capacity to serve the region's growth, the county would need to build a fourth regional treatment plant in Seattle to comply with the Permit. Bellevue is concerned that the high costs to comply with the Permit may drive growth to the rural areas of King County, which is contrary to the goals of the GMA.

Thank you for your consideration of Bellevue's comments and concerns. In closing, improving the region's water quality is a priority for the City. However, we believe it is important to delay issuance of the Permit until additional scientific analyses is conducted, options are developed that will result in measurable and sustainable improvements to water quality in Puget Sound, its economic impacts are assessed, and does not put at risk Bellevue's ability to comply with the GMA growth targets.

If you have any questions, please feel free to contact Nav OtaI at 425-452-2041.

Sincerely,



Lynne Robinson, Mayor

cc: Bellevue City Councilmembers  
Brad Miyake, City Manager  
Nav OtaI, Utilities Director  
Senator Lisa Wellman, 41st District  
Representative Tana Senn, 41st District  
Representative My-Linh Thai, 41st District  
Senator Patty Kuderer, 48th District  
Representative Vandana Slatter, 48th District  
Representative Amy Walen, 48th District