

WOODINVILLE WATER DISTRICT

17238 N.E. Woodinville-Duvall Road
P.O. Box 1390
Woodinville, Washington 98072-1390
(425) 487-4100
FAX (425) 485-6381

COMMISSIONERS
Chuck Clarke
Aleksandra Kachakov
Pamela J. Maloney
Tim Schriever
Karen Steeb

GENERAL MANAGER
Patrick Sorensen

August 16, 2021

Via WDOE Online Portal

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

Re: Puget Sound Nutrient General Permit (PSNGP)

Dear Ms. Ott:

On behalf of the Woodinville Water District's Board of Commissioners I am writing to share our concerns about the Washington State Department of Ecology's (WDOE) draft Puget Sound Nutrient General Permit (PSNGP) for municipal wastewater treatment facilities that discharge into Puget Sound. The District feels that WDOE's issuance of a PSNGP is premature and needs much more work before it can be implemented successfully. We request that WDOE 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, and alternatives have been better explored.

The Woodinville Water District serves a daytime population of over 50,000 residents and many businesses in unincorporated King County and in the cities of Woodinville, Redmond, Kirkland, and Bothell. Our wastewater is collected and treated by the King County Wastewater Division. We are essentially a wholesale customer of the King County Wastewater Division. The District is very concerned about the significant financial impact that an enhanced nutrient treatment regulation (as proposed to be issued by the WDOE) would have on the ratepayers of the District. Specifically, we are concerned about the lack of a long term benefit such a revised permit regarding the wastewater treatment process will actually bring to the Puget Sound and the ratepayers who will bear the cost for these enhanced regulations. Further, we think that more effort and focus should be addressed by WDOE in exploring other areas of nutrient impacts such as storm water runoff. The proposed changes to wastewater treatment plant systems through a revised nutrient permit process seem misguided. The existing treatment systems are already very efficient. This will cost the ratepayers many millions of dollars and likely not hit the desired mark WDOE is seeking in regard to the cleanup of the Puget Sound.

The District recognizes WDOE's responsibility to maintain compliance with water quality standards and to address dissolved oxygen (DO) impairment in sensitive areas of the Sound. We share Ecology's long-term 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.

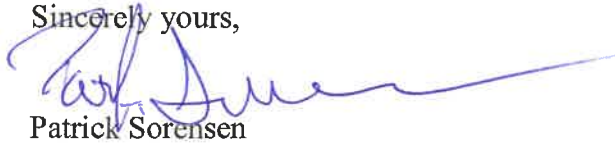
Again, as stated previously the PSNGP, as proposed by Ecology, will have significant economic impacts on residents and business owners in our District and in this region. WDOE needs to better assess the economic impacts of the PSNGP to ensure decision-makers are well informed on what the costs to residents and businesses will be. Residents and businesses served by King County wastewater treatment facilities could see rate increases 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. We must get this right.

King County and the Woodinville Water District are already not affordable for many residents and businesses. Wastewater rates in the Woodinville Water District have increased significantly over the last several years to meet enhanced treatment requirements. We have complied with the Growth Management Act and focused growth within the urban growth boundary, resulting in dense urban neighborhoods within our District which makes it un-realistically expensive to expand the footprint of King County's treatment facilities that serve us to comply with the proposed PSNGP. Significantly increased sewer rates brought on by this proposed mandate could make it difficult for residents and businesses in our District (and elsewhere in King County) to pay their future sewer bills. There is a point when individuals are priced out from receiving essential services. We want to maintain affordability for residents and businesses in our District. Likewise, we want to make wise and well-placed investments in this region that will actually benefit the Puget Sound's environment and the ratepayers.

Ecology should fully explore alternatives. WDOE should explore alternative approaches to improving Puget Sound water quality. For example, an alternative approach should initially focus on addressing storm water and 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. Like others we strongly support the restoration of the Puget Sound, but believe Ecology has not fully explored alternatives that would lead to a greater water quality benefit. Again, we do not have sufficient information yet from Ecology to justify this kind of significant investment to residents and business owners. If we do not do this right the ratepayers will likely lose confidence with all of us who are responsible for permitting, collecting, and treating wastewater in order to protect the Puget Sound.

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 and alternatives fully evaluated. If you have any questions regarding the District's position, please feel free to contact me anytime.

Sincerely yours,



Patrick Sorensen

General Manager, ICMA-CM

CC:

Woodinville Water District Board of Commissioners

Jack Broyles, Member of MWPAAC & District Finance Manager

Kamuron Gurol, Division Director, King County Wastewater Division

Sharman Herrin, Government Relations, King County Wastewater Division

Manka Dhingra, Senator, 45th Legislative District

Roger Goodman, Representative, 45th Legislative District

Larry Springer, Representative, 45th Legislative District