City of Maple Valley

Please accept the attached joint comment letter from the City of Maple Valley, City of Covington, and Soos Creek Water and Sewer District.

CITY OF MAPLE VALLEY

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August 16, 2021

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

Dear Ms. Ott:

We are writing this joint letter from the City of Maple Valley, City of Covington, and Soos Creek Water and Sewer District to request that Ecology delay the issuance of the Washington State Department of Ecology's (Ecology) draft Puget Sound Nutrient General Permit (PSNGP).

Together we recognize Ecology's responsibility to maintain compliance with water quality standards and to address dissolved oxygen (DO) impairment in sensitive areas of the Sound. This is a shared goal; however, there is not sufficient information to support the PSNGP as proposed by Ecology.

In the Maple Valley and Covington areas, we are supported by Soos Creek Water and Sewer District for sewer service. Based on King County estimates, rates for our commercial and residential properties could increase 420% by 2035. This increase in utility costs will have a significant financial impact to our current ratepayers and discourage new development already suffering from COVID related business losses. No doubt, economic recovery in the Puget Sound Region will also slow.

King County has provided the below reasons for delaying the issuance of the PSNGP. The cities of Maple Valley and Covington along with our partner utility purveyor, Soos Creek Water and Sewer District, strongly support the King County arguments below.

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.

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. 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 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 in King County which makes it very expensive to expand the footprint of treatment facilities to comply with the proposed PSNGP. Significantly increased sewer rates 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, we 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, please feel free to contact any of us listed below.

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