



**Washington Association
of Sewer & Water Districts**

EDUCATE ■ ADVOCATE ■ COLLABORATE

July 2, 2021

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

RE: Request to Extend the Draft Puget Sound Nutrient General Permit Comment Period

Dear Ms. Ott:

We are writing on behalf of the members of the Washington Association of Sewer and Water Districts to request a 45-day extension of the comment period for the Draft Puget Sound Nutrient General Permit (PSNGP). WASWD has 108 member districts across the state; of these, thirteen own and operate wastewater plants that would be directly affected by the General Permit. Many additional members would be indirectly affected because they send sewage to facilities operated by cities, counties, or other districts for treatment. Thus, our members and the customers they serve have a substantial interest in assuring that the PSNGP is developed in a manner that thoughtfully and realistically acts to resolve concerns with water quality in Puget Sound.

There is a great deal to be considered in the draft by staff, and in some cases consultants, working on all aspects of a member's operations. While a Preliminary Draft was issued earlier in the year, it was in significantly different form and content than the draft published on June 16. The draft permit covers a number of significant technical matters in its 56 pages that must be carefully reviewed along with the 86-page Fact Sheet. This is a sizeable amount of text to work through, especially given the substantial implications for permit compliance. Complying with it could require facility changes, operational changes, monitoring and reporting changes, and in many cases significant financial impacts. The Draft also requests fiscal and social analyses and reporting of a type we have not previously seen.

We also note that we have objected from early 2020 to the timeline Ecology has insisted upon for this process, believing that it was not conducive to an effective input process during the COVID-19 pandemic. Now the Draft has been released at the start of a summer when individuals are able, for the first time in 18 months, to take vacations and travel with their families, and the designated review period covers the heart of this period. Getting the right people together to review and comment on so much material during this time will be difficult.

The effort to control nutrients needs to be done in a thoughtful manner that allows for informed voices to be heard. The cost impacts of upgrading facilities to reduce nutrient loads will be very significant, and will have a noticeable impact on housing affordability for low-income residents and for businesses around the Puget Sound region. It is critical that Ecology allow ample time for affected agencies to review and comment on the draft materials.

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For these reasons, we request that Ecology extend the comment period to last through September 16, 2021.

Sincerely,

Washington Association of Sewer & Water Districts



Judi Gladstone
Executive Director



Jeff Clarke
Chair, Government Relations Committee