



Armondo Pavone Mayor

August 12, 2021

Ms. Eleanor Ott, P.E.
Washington State Department of Ecology
Post Office Box 47696
Olympia, WA 98504-7696
Sent via electronic email

RE: City of Renton Comments on the Draft Puget Sound Nutrient General Permit

Dear Ms. Ott:

I am writing to share the City of Renton's concerns with the Washington State Department of Ecology's draft Puget Sound Nutrient General Permit (PSNGP) for municipal wastewater treatment facilities that discharge into Puget Sound. The city is concerned that Ecology's issuance of a PSNGP is premature and needs additional research and analysis before it can be considered for implementation. We request that Ecology delay the issuance of the PSNGP until the modeling of nutrient inputs to Puget Sound is better understood, limited available data is fully evaluated and verified, alternative approaches have been analyzed, and a cost-benefit analysis is completed for the proposed PSNGP.

The city recognizes Ecology's responsibility to maintain compliance with water quality standards and address dissolved oxygen (DO) impairment in sensitive areas of the sound. The city shares Ecology's goal; however, the city believes there is insufficient information to quantify the benefit versus the cost of the permit to support the PSNGP as proposed by Ecology.

The current science does not support the issuance of the PSNGP. There remain significant scientific uncertainties associated with understanding DO depletions in Puget Sound and the use of the Salish Sea Model as the tool to support regulatory requirements. 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 the City of Renton and Puget Sound Region. Ecology needs to assess the economic impacts of the PSNGP to ensure decision makers are well informed on the costs to residents and businesses. Residents and businesses served by the city and King County wastewater treatment facilities estimate rate increases up to three times greater than current rates just to comply with the PSNGP as proposed. The King County

Wastewater Treatment rate for a single-family residential home is currently \$47.37 per month, which could increase to \$142.10 per month, or \$1,705.32 per year, to comply with the PSNGP requirements. This does not include any additional rate increase needed for King County Wastewater Treatment asset maintenance and replacement or increased operating costs for normal operations. Given the regional need to tackle stormwater management, habitat restoration, and other actions necessary for Puget Sound recovery, Ecology should recognize the cost of all environmental programs and prioritize those programs with the greatest benefit to Puget Sound and water quality.

The PSNGP cost of compliance could increase the risk to water quality in Puget Sound and the future economic growth of the state. The significant cost to achieve compliance with the draft PSNGP could force wastewater treatment plant operators to defer infrastructure investments needed to maintain current operations, which include asset maintenance and replacement programs to focus on regulatory compliance. The Growth Management Act (GMA) requires communities in the Puget Sound Region to accommodate the significant growth that is occurring in the state, especially in the region. The PSNGP would also increase the burden of wastewater treatment plant operators to make system investments needed to accommodate the region's future growth, which may result in sewer connection moratoriums due to the lack of sufficient wastewater treatment capacity at some wastewater treatment plants. The cost of the PSNGP would also adversely impact the cost of building affordable housing for low-income residents and increase the challenges communities face in trying to provide the quantity of affordable housing needed to prevent and reduce homelessness in the region.

The City of Renton wants to remain affordable for all residents and businesses. We have complied with the GMA and focused growth within the urban growth boundary, resulting in dense urban neighborhoods, which make it very expensive to expand the footprint of treatment facilities to comply with the proposed PSNGP.

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



The City of Renton wants to emphasize the importance of delaying issuance of the PSNGP until the modeling and data on nutrients are well understood and alternatives fully evaluated.

Thank you for considering our comments.

Sincerely,



Armondo Pavone
Mayor

AP:aa

cc: Senator Bob Hasegawa
Representative Steve Bergquist
Representative David Hackney
Renton City Council
Ed VanValey, Chief Administrative Officer
Martin Pastucha, Public Works Administrator
Christie True, Director, King County Department of Natural Resources and Parks
Kamuron Gurol, Division Director, King County Wastewater Treatment Division
Ron Straka, Utility Systems Director
Jason Seth, City Clerk

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