

City of Auburn

The City of Auburn (Auburn) supports Ecology's objective to improve water quality in the Salish Sea to improve the habitat for marine life. The intent of the Nutrient Reduction Plan currently being developed could be an important tool to assess the impacts of nutrients from all sources (including stormwater runoff, failing septic systems, low stream and river discharges, and wastewater treatment plants) and to develop effective, affordable reduction strategies. Auburn believes that the Draft Nutrient General Permit (Draft Permit) currently out for public comment should be used only for gathering data and developing planning-level strategies. This data could be used to inform the Nutrient Reduction Plan and provide a holistic approach to nutrient reduction in the Salish Sea. Implementation of nutrient reduction strategies at the dominant wastewater treatment plants listed in Section S4.B, Table 5 of the Draft Permit should be delayed until the effectiveness, cost, and feasibility of these strategies can be evaluated further.

Auburn contracts with King County Department of Natural Resources for wastewater treatment and disposal. We request that the Department of Ecology consider the following revisions to the Draft Nutrient General Permit, based on an assumed Permit effective date of January 1, 2022:

Section S4.C.1.b allows King County to exclude optimization strategies that exceed a reasonable implementation cost ("reasonable" is not defined) and one year implementation timeframe. Optimization strategies that meet the cost and timing criteria may not be feasible given the size, complexity, flows, nutrient loading, and space limitations King County's wastewater treatment plants. There is no indication in the Draft Permit of what an agency is to do if there are no feasible optimization strategies that meet these criteria.

Section S4.C.1.c requires King County to select an optimization strategy by May 1, 2022 (within 4 months) and implement it by March 31, 2023 (11 months later). Any strategy that can achieve a significant reduction in the Total Inorganic Nitrogen (TIN) from King County's 3 large treatment plants will likely involve construction of nutrient reduction facilities, which is unlikely in such a short time frame. In addition, King County believes that it will exceed its nutrient limits starting in 2022, which will then trigger the 10% reduction (Section S4.D.1.c) in TIN by 2027. For the West Point plant with its limited available space, TIN reduction may require siting, design and construction of pump stations to divert the flows to the other two treatment plants or a new treatment plant. Neither the pump stations nor the treatment plant could be constructed within that time frame.

Section S4.C.3 (source control) describes measures to reduce influent nitrogen from new multi-family residential and commercial building and from septage handling. Such measures will take several years to implement, requiring regulatory changes across many jurisdictions. Restrictions on septage handling may result in illegal discharges to sewer manholes or the environment. This should be an optional, not required, component, and additional time should be provided to evaluate these measures.

Delete Section S4.D.c (engineering report) and instead place the focus on the Nutrient Reduction Evaluation in Section S4.E, which will provide a comprehensive evaluation about feasibility, effectiveness, and cost of various measures. The Nutrient Reduction Evaluation should precede implementation of any strategies.

Auburn believes that additional time is needed to complete the comprehensive Nutrient Reduction Plan, to evaluate and compare the results of various models (e.g., the Salish Sea model, the Puget Sound model, models that address river and stream discharges, etc.), to explore alternative actions, and to collaborate to develop a balanced, regional plan supported by all stakeholders. While improving the water quality of the Salish Sea is an important goal, the region cannot afford to take actions that stifle economic recovery in the wake of the pandemic, require unaffordable sewer rates, and result in building moratoriums to prevent increases in nutrient loadings.