

# City of Mercer Island

## Request to Delay Puget Sound Nutrient General Permit (PSNGP) Permit Issuance

The City of Mercer Island requests that the Washington State Department of Ecology (Ecology) delay the issuance of the draft Puget Sound Nutrient General Permit (PSNGP) for municipal wastewater treatment facilities that discharge into Puget Sound. Please see attached letter for details.



**PUBLIC WORKS DEPARTMENT  
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August 5, 2021

State of Washington  
Department of Ecology  
Olympia, WA 98504

**Re: Request to Delay Nutrient General Permit Issuance**

I am writing on behalf of the City of Mercer Island to request the Washington State Department of Ecology (Ecology) delay the issuance of the draft Puget Sound Nutrient General Permit (PSNGP) for municipal wastewater treatment facilities that discharge into Puget Sound.

The City of Mercer Island supports Ecology's mission and its responsibility to maintain compliance with water quality standards and to address potential issues in sensitive areas of the Sound. In support of these efforts, the City prefers to partner with Ecology in a collaborative and regional approach to address these issues. In order to improve water quality standards and adequately address potential issues, we need additional time to: (1) review and better understand the science behind the issuance of the PSNGP; (2) better understand environmental impacts; and (3) better understand the financial impacts of the PSNGP on Mercer Island residents, businesses, and City operations.

**(1) Understanding the Science.** As we are all aware, the Puget Sound is a complex ecosystem that needs to be studied and evaluated by a body of experts. The City finds there remain significant scientific uncertainties associated with understanding dissolved oxygen (DO) depletions in Puget Sound and use of the Salish Sea Model as the tool to support these regulatory requirements.

**(2) Understanding the Environmental Impacts.** As proposed, the PSNGP will have significant environmental impacts on communities across in this region – including the City of Mercer Island and our residents and businesses. 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.

**(3) Understanding the Financial Impacts Associated with the PSNGP.** An economic assessment of impacts of the PSNGP needs to be conducted to ensure decision-makers are well informed of the actual costs to communities. Preliminary estimates suggest that 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. This is a significant concern for the City of Mercer Island and for the region as a whole. The City is also concerned about the financial impacts it will incur in implementing the PSNGP.

To reiterate, the City of Mercer Island strongly supports the restoration of Puget Sound as well as Ecology's responsibility to maintain compliance with water quality standards and to address DO impairment in sensitive areas of the Sound. It does not, however, have sufficient information to support the PSNGP as proposed by Ecology for the aforementioned reasons.

**We need to get this right for the environment as well as the people we serve.** As such, we request a delay in the issuance of the PSNGP to address these issues and to give communities and Ecology additional time to explore alternative approaches to improving Puget Sound water quality.

Thank you for your consideration of our comments. If you have questions, please contact me at 206-275-7802 or [Jason.Kintner@mercerisland.gov](mailto:Jason.Kintner@mercerisland.gov).

Sincerely,



Jason Kintner  
Chief of Operations

CC     Jessi Bon, City Manager  
         City Council  
         Representative Senn  
         Representative Thai  
         Senator Wellman