

June 28, 2023

Washington State Department of Ecology  
Attn: Tricia Miller, Permit Administrator  
Northwest Regional Office  
Shoreline, WA

Re: Response to Draft NPDES Permit WA0029181  
King County West Point Treatment Plant and Combined Sewer Overflow System

Ms. Miller,

The Metropolitan Water Pollution Abatement and Advisory Committee (MWPAAC) represents the 15 cities, 18 special purpose districts, and 1 tribe that partner with King County's Wastewater Treatment Division (WTD) to protect water quality and public health in the Puget Sound area. MWPAAC agencies represent over 1.9 million people in King, Pierce, and Snohomish Counties. Our role is to advise the King County Executive and Council on matters related to the wastewater collection and treatment system. MWPAAC members are responsible for the individual agency sewer collection systems that convey wastewater to the King County system for treatment. Thus, WTD's performance protecting water quality and WTD's financial condition are of great interest to our agencies. Our wastewater services, financial health, and rate affordability are inextricably linked to WTD.

In recent years, MWPAAC has worked more closely than ever with WTD to plan and finance increasingly costly improvements to the wastewater system with an eye toward improving performance while still maintaining customer affordability. Over the next decade, WTD is projecting to spend \$7 billion on capital projects to comply with existing regulations, replace a backlog of aging assets, and expand system capacity for our growing region. WTD forecasts that residential sewer rates will double in 10 years, even without including the added costs of new regulations and permit requirements.

While we agree with the need for these expenditures, we are concerned that the low- to moderate-income households we serve will struggle to keep up with steeply rising sewer bills. Another pressing concern is that WTD's accelerated spending on regional infrastructure will "crowd out" individual agencies' ability to invest in the backlog of aging *local* sewer assets.

MWPAAC representatives have reviewed the Draft NPDES Permit for WTD's West Point Treatment Plant, as well as the blog post, public hearing presentation slides, and fact sheet. We appreciate the detailed materials and understand Ecology's role in setting requirements.

Our members are concerned that the compressed timeline of the facility improvements required for Permit compliance will exacerbate the pattern of costly projects stacking up in a constrained period. Project delivery, which is already difficult in this tight labor market, becomes more difficult as the list of near-term requirements grows. Added compression of major regulatory capital projects puts pressure on WTD to delay critical asset management and capacity-expansion projects. Such delays increase the risk of infrastructure failures and capacity related overflows.

To mitigate this risk, MWPAAC is requesting that the Department of Ecology consider an adjusted timeline of required compliance for planning and construction of facility improvements needed to meet the revised TSS requirements, as well as focusing on the most significant

sources of PFAS. We believe that this approach would be a prudent balance of the benefits and costs of compliance in this challenging time. WTD has indicated that the implementation schedule for the improvements at Elliot West is challenging. We encourage WTD and Ecology work together to establish an achievable schedule for bringing this facility into compliance.

Most importantly, it is imperative that we acknowledge the myriad competing needs and demands for staff and financial resources and work to identify the most cost effective, timely, and least impactful way of achieving the collective water quality improvement goals that we all share. We appreciate the opportunity to comment on this important draft permit and we look forward to future opportunities to increase collaboration between our member agencies, WTD and the Department of Ecology.

Sincerely,

John McClellan  
Chair, MWPAAC  
General Manager, Alderwood Water & Wastewater District