

Association of Washington Cities

Please clarify that use of Ecology's spreadsheet tool is recommended but not required under the PSGNP.

Ecology's guidance and spreadsheet tool relies on EPA's Alternative 1 yet Alternative 2 provides a more accurate financial picture, year-over-year, on impact to ratepayers than Alternative 1. Please provide guidance for Alternative 2.

For permittees that choose to use it, is Alternative 2 compliant with the PSNGP?

Please describe how the agency will use the data provided in Ecology's spreadsheet tool, or using a different method, when submitted by permittees?

Please remove the following characterization on impacts on the top of page 17: "marginal burden." Although Ecology has only received a small fraction of financial assessments as provided to the agency this spring under AWC's Nutrient Regional Project, funded by the Legislature, and only for moderate and small dischargers, the impacts to ratepayers to comply with what is contemplated by the PSNGP is far from marginal. We suggest this instead: ...which aids permittees and Ecology in understanding the impacts of permit requirements,

Section 4 – Funding sources to consider – Please remove the following as occurring in the past or, based on our understanding, not relevant to funding WWTP capital costs under the PSNGP:

Pg. 18 - Puget Sound nutrient reduction grants program (2021-2023)

Pg. 18 - Low Income Household Water Assistance Program

Pg. 19 - EPA's Environmental Justice Small Grants Program

Pg. 19 - Environmental Justice Collaborative Problem-Solving Cooperative Agreement Program – Doesn't appear to have been funded in the last decade

Pg. 19 - Source Reduction Assistance (SRA) Grant Program

Pg. 20 - Pisces Foundation Water Grant

Pg. 21 - U.S. Small Business Administration (SBA)'s Business Physical Disaster Loans

Pg. 21 - BIL Resources – General information and not specific to funding wastewater infrastructure upgrades

Pg. 21 - Drinking Water and Wastewater Utility Customer Assistance Programs

There are several specifically for disaster relief (HUD and FEMA), which doesn't seem to apply in this context. Please remove.

Please remove any that are not funding sources (i.e. technical assistance).

Please remove any general programs that link to webpages mixed with relevant and irrelevant sources and include the specific programs instead. (i.e. EDA)