

Laurie Pierce

Thank you for this opportunity to offer comments regarding the financial capability assessment tool in support of Environmental Justice and AKART requirements in the Puget Sound Nutrient General Permit.

At first glance, this tool appears cumbersome and overly complex.

After working with it, I've found that there are many built-in features that address some of my initial concerns.

I would like to make a general comment in response to some of the questions from the July 24th workshop – people were asking, “What will be done with this information?”

I think if a community can demonstrate that compliance with the PSNGP causes undue hardship for a majority of their ratepayers, they should be moved up the list of potential funding recipients to support plant improvements to bring them into compliance with the general permit. It could potentially make them eligible for pollutant trading agreements or other programs which may give them additional time to plan and finance necessary improvements. These are just my suggestions, but if there is some benefit to the utility and their ratepayers, it will be easier to get them to use this tool. Another point from the workshop was, if your utility has another way of demonstrating the impacts of complying with the general permit on ratepayers, put that information together and send it in along with the completed FCA spreadsheets. Tell your story any way you can.

Overall, I hope that everyone in the wastewater industry can see that the general permit is necessary to ensure a healthy future for Puget Sound. Eventually, the requirements in the general permit should make their way into everyone's individual permits.

There are many other regions such as ours that have had to deal with similar issues, and they've risen above the myopic perspective to see what is necessary to protect a common resource – Chesapeake Bay, San Francisco Bay, and others. We need to be foresighted enough that we choose to take that same perspective – don't think only about today, but about 100's of years in the future. Don't leave behind a mess for someone else to clean up. We know that reducing nutrients in our discharge is the right thing to do.

It is not the only thing we need to do, but it's a start.