

September 29, 2023

Austin Melcher
Washington Department of Ecology
Water Resources Program
P.O. Box 47600
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RE: Olympic View Water and Sewer District Comments on Proposed Revisions to Municipal Water Policy 2030

Olympic View Water and Sewer District appreciates the opportunity to comment on the proposed Policy 2030 update. We appreciate the dialogue that Ecology has conducted with utilities through the Washington Water Utility Council (WWUC) over the past several months to get a better understanding of utilities' perspective on issues covered in the Policy 2030 update.

We understand that the intent of revising the policy is to provide clarity on important issues and promote consistency in the review of and decisions on municipal water rights. However, as proposed it will do just the opposite as it leaves many critical issues for future Ecology assessment on a "case-by-case" basis. This approach destabilizes municipal water rights by making it difficult for municipal water suppliers to know what is required of them and frustrating their critical role in serving growing communities as identified in Growth Management Act comprehensive plans. Furthermore, Policy 2030 revisions would create additional hurdles as municipal water suppliers seek to increase climate change resiliency.

There are many specific issues with the proposed revisions to Policy 2030 that are documented in the comments provided by the WWUC. We concur with their conclusion that *"the Draft Policy mistakenly excludes water rights held by WWUC members from legal protections from relinquishment, frustrates planning, and makes it harder to secure and maintain safe and reliable drinking water for Washington's growing communities. This strained interpretation of the MWL avoids legislative intent and precludes a common understanding of water law terms and requirements, which adversely affects the dialogue and problem solving needed to address current and future drinking water and water resources challenges."*

Particularly at this juncture, it is ill advised for Ecology to dampen the tools that utilities have inherent in the MWL given the foreseen challenges of population growth, climate change, threats to drinking water quality, and concerns about utility rates that support affordable

housing. We support the comments provided by WWUC and urge you to be guided by those comments in the next iteration of Policy 2030.

Respectfully,

Bob Danson
General Manager
Olympic View Water & Sewer District