**Olympic View Water & Sewer District**

**Board of Commissioners**

Lora Petso

John Elsasser

Judi Gladstone

8128 228th Street SW P: 425.774.7769

Edmonds, WA 98026-8449 F: 425.670.1856

Olympicviewwater.com

June 21, 2024

Austin Melcher

Washington Department of Ecology

Water Resource Program

P.O. Box 47600

Olympia, WA 98504-7600

**RE: Olympic View Water & Sewer District Support for WWUC Comments on Proposed Revisions to Municipal Water Policy 2030**

Olympic View Water & 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 Utilities Council (WWUC) over the past several months to get a better understanding of utilities’ perspectives on issues covered in the Policy 2030 update.

However, it is concerning that the second draft continues to leave many critical issues for future assessment on a “case-by-case” basis, leading to potential instability and uncertainty for municipal water rights. This approach makes it difficult for municipal water suppliers to plan and operate effectively, thereby impacting their ability to serve growing communities as identified in Growth Management Act comprehensive plans. Furthermore, the revisions to Policy 2030 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.”

Given the anticipated challenges of population growth, climate change, threats to drinking water quality, and the need for affordable utility rates, it is ill-advised for Ecology to dampen the tools that utilities have inherent in the MWL. 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