



Metropolitan Water Pollution Abatement Advisory Committee

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MEMBERS:

Alderwood Water and Wastewater District
City of Algona
City of Auburn
City of Bellevue
City of Black Diamond
City of Bothell
City of Brier
City of Carnation
Cedar River Water and Sewer District
Coal Creek Utility District
Cross Valley Water District
Highlands Sewer District
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Southwest Suburban Sewer District
City of Tukwila
Valley View Sewer District
Vashon Sewer District
Woodinville Water District

June 24, 2020

SENT VIA EMAIL ONLY

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King County Wastewater Treatment Division
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Seattle, WA 98104-3855

SUBJECT: Clean Water Plan Environmental Impact Statement Scoping

Dear Ms. Fischer:

The Metropolitan Water Pollution Abatement Advisor Committee (MWWPAAC) appreciates the opportunity to provide comments on the scope of the Environmental Impact Statement (EIS) for King County Wastewater Treatment Division's (WTD) Clean Water Plan, as well as to propose a plan for ongoing collaborative engagement by MWWPAAC in the preparation of the EIS. This partnership will allow component agencies to provide substantive input and help create public understanding of the complexities of the Clean Water Plan and the need for adequate funding to achieve its goals.

WTD should consider the following key principles in developing the scope of the EIS:

- Consider the impact of alternatives on the local agencies, tribes, and disadvantaged groups
- Consider wastewater alternatives in concert with all regional water resources (drinking water, streamflow requirements, stormwater, receiving water quality)
- Seek opportunities for collaboration with local agencies and other partners to achieve economies of scale and enhanced environmental protection
- Seek to keep sewer rates affordable

A detailed list of MWWPAAC's comments on each major category of alternatives to be evaluated in the EIS is attached.

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To promote regional understanding of the alternatives in the EIS, MWPAAC requests that the EIS team provide periodic, in-depth briefings to MWPAAC, with the opportunity for discussion, at the following milestones:

- Draft EIS scoping document
- Completion of draft alternatives descriptions
- Socioeconomic impacts of alternatives
- Draft EIS
- Comments on Draft EIS

MWPAAC members will use this information, in conjunction with WTD's robust public education and outreach program, to help local leaders understand the future policy decisions and funding needs to support the Clean Water Plan. MWPAAC will provide ongoing feedback to WTD throughout the environmental evaluation through its Task Force members, as well as during MWPAAC meetings.

MWPAAC looks forward to collaborating with WTD on the development and evaluation of this important regional plan.

Sincerely,



Pamela Carter
MWPAAC Chair

Attachment

cc: MWPAAC Members
Mark Isaacson, Division Director, Wastewater Treatment Division (WTD), Department of Natural Resources and Parks (DNRP)
Steve Tolzman, Clean Water Plan Project Manager, WTD, DNRP

Compilation of MWPAAC Comments June 4, 2020 E&P Subcommittee Meeting King County WW Clean Water Plan Scoping Document

Regional Wastewater Treatment Plants

- This action alternative mentions the use of advance treatments to remove enough pollutants to produce drinking quality water. WTD should evaluate the environmental, logistical and economic impacts of expansion of the reclaimed water system.
- Medium size satellite plants should be evaluated in addition to small and large satellite plants.
- The regional treatment plants section should include an action that explores small scale satellite plants that could be constructed by a developer or WTD in high growth areas to treat wastewater from new developments, and define the benefits of small plants.
- The regional treatment plants section should include an action that explores nutrient credit trading as a means to achieve future nutrient requirements in the Puget Sound.
- All the options shown in the Clean Water Task Force presentations to date should also be reflected in some way within the SEPA scoping document.

Capacity in Regional Sewer Pipes and Pumps

- This action alternative describes conveyance system control optimization. The evaluation of the alternative should include the potential impacts on component agencies systems under this alternative. For example, could SPU CSO overflows increase or decrease due to these alternatives.
- I&I alternatives should evaluate key impacts on member agencies.

Aging Sewer Systems, Natural Disasters, and Climate Change

- Rather than just “natural disasters”, the plan should specifically evaluate seismic risk/vulnerability.
- Climate change actions should specifically include sea level rise.

Recycling Resources from Wastewater

- Assessment should include a “value question”; what are the environmental benefits of investments in recycling resources, as compared to the cost of the investment? There should be an analysis that aligns with the desire for investment that provides the greatest environmental benefit for the investment.
- Consider the regulatory requirements that drive the need to produce reclaimed water.
- Explore the use of recycled water for augmenting in-stream flows (e.g., Sammamish River) under the Water Restoration and Enhancement Plans (RCW 90.94).

Stormwater and Combined Sewer Overflows

- Is it WTD’s intent to evaluate the potential impacts of stormwater projects only in the areas in Seattle served by the WTD combined sewer-stormwater system, or potential stormwater projects throughout King County? Clarity should be provided around this to ensure that all potential environmental and economic impacts are evaluated if the alternative is looking County-wide.

- The stormwater and combined sewer overflow section should be more specific about alternatives that could result in equal or better water quality benefits being explored in this plan.
- The stormwater and combined sewer overflow section should include an action or alternative that explores the benefits for joint CSO planning and coordination with the City of Seattle, including specific options .
- Compare the value of stormwater treatment versus or in addition to nutrient removal. All of these categories need to be compared against each other, not just in individual silos.)
- Evaluate the opportunity and feasibility of putting stormwater into the WW treatment system rather than directly discharging into the water bodies, resulting in better receiving water quality that may in turn reduce WWTP requirements.
- Consider how to address PFOS/PFAS.

Pollution Reduction Issued Preventing Pollution at the Source

- WTD relies on SPU to meet some of its Industrial Wastewater Discharge Permit requirements to conduct source control in CSO Basins (minimum requirement 7). WTD should include the potential impacts to component agencies during the evaluation of this alternative.
- Consider pollutants outside of the industrial realm that enter the system and cannot easily be removed by the treatment system (producer responsibility).
- Consider how education/public outreach can prevent pollutants from entering the waste stream.

Pollution from Historical Activities

- Seeking clarification; is this assessing existing liability under Superfund law, or is the intent to look at alternatives that go beyond regulatory responsibilities?

Socioeconomics and Environmental Justice

- These are extremely important to WTDs component agencies and our customers. WTD should fully evaluate the impacts of these alternatives, including through meaningful engagement with the community, Tribal governments, and component agencies that fund the alternatives in this EIS.
- Consider the impact of alternatives on keeping sewer rates affordable, and their impact on affordable housing.
- Recognize that King County sewer rates are only part of the cost of sewer service for customers, and that the local agencies are facing many of the same issues (growth, aging infrastructure) that King County faces.