Pollie McCloskey

From: Debbie Tarry
Sent: Wednesday, July 28, 2021 1:06 PM
To: Pollie McCloskey
Subject: FW: Dept. of Ecology Nutrient General Permit
Attachments: Shoreline comment letter on DOE PS General Nutrient Permit.docx

Will you include in my update folder? Not the letter yet until we have a final draft probably for another week.

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From: Randy Witt <rwitt@shorelinewa.gov>
Sent: Friday, July 23, 2021 2:30 PM
To: Debbie Tarry <dtarry@shorelinewa.gov>; Jim Hammond <jhammond@shorelinewa.gov>
Subject: Dept. of Ecology Nutrient General Permit

Hi, there are a few things in motion on this DOE permit that I want to update and coordinate. I attended 2 meeting Wednesday on the DOE nitrogen permit. Below are some key points raised or discussed in the meetings, they may fit into the meeting between Kamuron and the Mayor. I also started to take a cut and tailoring the KC template letter to be a letter from the City..

Debbie, share this with the Mayor as appropriate.

1. Meeting with King County DNRP/WTD staff (7/21 at 4:00). This meeting was with several KC staff including Christie True, Kamuron Gurol and Rebeca Singer (who did most of the presentation). Points they raised included:
    a. Overall sense that the modeling does not support the solution
        i. DOE built and used one model, did not look at or use others (like the KC model) to get boundaries on problem and effectiveness of solution. (DOE got a grant to build the "Salish Sea" model)
        ii. Limited (or no?) field sampling to verify model accuracy and support model conclusions
        iii. Main source of nitrogen in Sound is ocean (90%), not WWTP (7% -> 70% of remaining 10% outside of the ocean contribution)
        iv. Low DO has several causes including algae blooms and deaths, warm temperatures, flushing.
        v. KC model shows that even if all WWTP nitrogen is eliminated that the targeted water bodies remain impaired.
    b. KC will exceed the permit requirement 2022 and will have to initiate steps for a 10% reduction in nitrogen in the effluent

c. KC anticipates doubling sewer rates by 2030 without inclusion of cost associated with this general permit.
d. Is the permit the most cost-effective approach to solving the problem?
e. Expectation is the DOE will approve rule quickly, and anticipate being sued, allow that to refine permit.
f. DOE did not do an economic analysis of rule impacts citing an exclusion in the WAC, this seems to overlook the impact to ratepayers.
g. KC feels other factor such as storm water, habitat loss and shoreline degradation may be significant factors in this area and addressing them may be more effective. (Q – septic systems in immediate area of low DO locations?)
h. Older plants will require significant modification to address nitrogen treatment
i. Want to have city/district input/comments to help create a record.

2. DOE webinar public hearing on the Nutrient General Permit (7/21 at 5:30). This was a public meeting on the permit with a portion on general Q&A with DOE staff and hearing with a hearing examiner on the permit itself. Some highlights from this meeting are:
    a. Reiterated that core issue is WWTP nutrients contribute to algal bloom, bloom dies and low dissolved oxygen areas develop.
    b. There are other areas where parallel efforts by DOE are occurring to help address this issue. Mentioned looking at web site, not discussing at this meeting.
    c. Walked though effort with 2019 boundary study, the early draft, now looking for comment on final draft. Comments were accepted at all points. Coordination with WWTP owners was conducted.
    d. Disused why general permit rather than including in individual WWTP permits
    e. Discussed that grants and loans are available and intended to ease the financial impacts to ratepayers.
    f. When asked if compliance with this permit would take precedence of other law to accept growth, DOE stated yes and noted that there is time to plan for implementation of the permit requirements..
    g. In the hearing 3 King County staff spoke including Kamuron and one person (a commissioner?) from a sewer district.

3. Template letter update
4. Attached is a first cut at a City comment on the permit using the KC template as a basis. All input/edits are welcome. My thought to provide it to the May in advance of the meeting with Kamuron.

Randy

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