

Clean Water Plan Advisory Group

Meeting #9 Summary

Background

The King County Department of Natural Resources and Parks (DNRP) has convened the Clean Water Plan Advisory Group to:

- Advise King County on the planning process to identify the most effective water quality investments the region can make.
- Advise King County on the ways to best engage and hear from key interests and constituencies throughout the region, including historically underrepresented groups.
- Provide insights and information related to the pressures, issues, and trends impacting constituencies and businesses throughout the region.
- Assist King County in understanding high-level implications, trade-offs, and opportunities associated with the planning process.

The ninth meeting of the Clean Water Plan Advisory Group took place on February 4, 2021 virtually, through a web-based conference call. Meeting #9 objectives were to:

- Provide an overview of the Clean Water Healthy Habitat Strategic Plan and how it relates to the Clean Water Plan.
- Respond to Advisory Group interests related to the County's assumptions and analytical approach driving Action results, specifically around costing, pollutant loading, and collaboration and partnership requirements.
- Preview upcoming regional engagement efforts that will provide detailed Actions information, specifically the Action Technical Workshops and the Actions Document, and discuss Advisory Group member feedback on the outlines for these efforts.
- Review next steps in the planning process.

In advance of the meeting, Advisory Group members were provided a briefing document that contained the following:

- An executive summary of the Clean Water Healthy Habitat Strategic Plan
- A non-attributed synthesis of Advisory Group feedback collected across two consultations since the December 10 Advisory Group meeting:
 - An input opportunity to provide written feedback on Actions via a spreadsheet; specifically, what additional information or questions would be most helpful to members to better understand the performance results for the Actions.
 - One-on-one check-in calls with Advisory Group facilitator Rob Greenwood. These calls provided an opportunity to discuss how best to share the results of the Action analysis as the County nears completion of its efforts to characterize the Actions and begins the process of formulating alternative Strategies.

- Details and current working draft outlines for two upcoming regional engagement efforts that the Clean Water Plan team is planning to share Action details and analysis, including:
 - Actions Technical Workshops (March-May)
 - Actions Document (March-April)

The briefing document also included the discussion questions that Advisory Group members could anticipate in Meeting #9 related to these items.

This meeting summary provides non-attributed highlights from the presentations and discussions from the February 4, 2021 meeting.

Land Acknowledgement & Opening Remarks

DNRP leadership opened the meeting with a welcome and an acknowledgement that, though meeting virtually, many participants were calling in while located on the traditional land of Duwamish People. They expressed gratitude for all Coast Salish People, past and present, stewards of this land since time immemorial.

Next, DNRP leadership noted that in response to questions about the Clean Water Plan timeline, the County will be adjusting the schedule to provide additional time for interested parties and elected officials to familiarize themselves with the Clean Water Plan's Actions. How this adjustment will affect the overall timeline for the planning process is still being determined.

DNRP leadership then introduced Abby Hook, Environmental Affairs Officer within DNRP, who leads the [Clean Water Healthy Habitat Initiative](#). She provided an overview on that initiative and how it relates to the Clean Water Plan. The intent of including the presentation at this Advisory Group meeting was to address any confusion between the Clean Water Healthy Habitat Strategic Plan and the Clean Water Plan, and to highlight how the County is striving to better integrate concurrent planning efforts for the best possible outcomes for the region.

DNRP leadership acknowledged the January 13, 2021 overflow event at West Point Treatment Plant, noting that King County's Wastewater Treatment Division (WTD) is responding to the Department of Ecology's administrative order to address the plant's electricity disruption challenges by implementing measures to improve the on-site power supply in partnership with Seattle City Light.

Finally, DNRP leadership noted that Department of Ecology's preliminary [Draft Puget Sound Nutrient General Permit](#) is out for public comment, the period for which closes on March 15.

Planning Process Reminder

The County shared an update on the Clean Water Plan process and schedule, noting that in response to feedback from the Advisory Group and elected officials, the team will build in more opportunities in the first half of 2021 (Q1-Q2) to focus on regional engagement on Actions in an effort to build foundational understanding of the choices and opportunities the region faces and the related spectrum of possible water quality investments. The team will continue technical work on Strategies in parallel with the regional engagement efforts in that timeframe. For the second half of 2021 (Q3-Q4), the team

will develop and hold a regional discussion on Strategies that present alternative approaches to investing in the regional wastewater system and water quality. The release of a technical report presenting the Strategies and a State Environmental Policy Act (SEPA) Draft Environmental Impact Statement (DEIS) – to include Strategies as the alternatives being evaluated – will be timed so that Advisory Group members and other regional interested and impacted parties can make a meaningful contribution to Strategy formulation and characterization.

Related to this timeframe, anticipated future Advisory Group meeting topics (and their estimated timeframes, to be scheduled) include the following:

- Meeting 10: Actions Feedback & Strategy Formulation (Q2 2021)
- Meeting 11: Discussion of Strategies & DEIS (Q3 2021)
- Meeting 12: Preferred Strategy & Implementation Plan (Q4 2021)

In response to this schedule update, an Advisory Group member noted that a critical step for the Clean Water Plan process is obtaining approval from regulatory agencies and asked when that approval would be obtained within the process. King County shared that the Clean Water Plan will be submitted to the Department of Ecology after the King County Council approves the Plan. The County will complete a programmatic environmental impact statement (EIS) on the Clean Water Plan to comply with SEPA requirements. During implementation of the Clean Water Plan, separate environmental reviews under SEPA and a variety of regulatory approvals will be completed and obtained for specific projects. In response to another Advisory Group member's request for more information regarding the regulators involved in Clean Water Plan approval, the Clean Water Plan team provided the following post-meeting:

The Clean Water Plan will be the successor to the Regional Wastewater Services Plan, which is King County's existing Department of Ecology approved general sewer plan. General sewer plans are required of any governmental agency providing sewer service. No other regulatory approvals of the Clean Water Plan are required. The water quality projects and wastewater system maintenance projects that will be included in the Clean Water Plan will require approval from a variety of local, state, and federal agencies depending on the scope and scale of the project. [The Clean Water Plan Existing Conditions Report](#) contains information on wastewater, stormwater, and sediment management regulatory programs that are included in the approvals and permits needed for water quality projects. There will be additional permits and approvals needed for water quality projects and wastewater system maintenance projects beyond those listed in the Existing Conditions Report. Examples of these permits and approvals include Notice of Construction/Order of Approval from Puget Sound Clean Air Agency, Washington Department of Fish and Wildlife Hydraulic Project Approvals, and city or county land use permits.

Clean Water Healthy Habitat Initiative and Strategic Plan

During this session, Abby Hook provided an overview of the Clean Water Healthy Habitat Initiative and related Strategic Plan, including the origins of the initiative, its goals and measures, key principles and strategies, and relationship to the Clean Water Plan. Following this overview, individual Advisory Group members shared several observations and questions:

- As part of the planning process, looking at alternatives to how the County might comply regulatory requirements, in contrast to considering “regulatory alternatives” will keep the Plan in known and more comfortable territory.
 - DNRP leadership responded that they are considering both alternatives to meeting (compliance with) regulatory requirements as well as regulatory alternatives. For the latter and as an example, the County indicated it is in discussions with some county regulators about potential changes to code. Specifically, it is talking with King County Department of Local Services that administer approvals and permits for habitat restoration projects in unincorporated King County to identify possible alternatives to how those projects are permitted.
- Do the Clean Water Healthy Habitat strategies apply to everything in the Clean Water Plan?
 - The County confirmed that the terms are used differently across the two planning efforts; a Strategy in the Clean Water Plan is different than a strategy in the Clean Water Healthy Habitat Initiative. Not all Clean Water Healthy Habitat strategies apply to the Clean Water Plan.
- Several members noted that the mapping efforts that will be used to identify opportunity zones within the context of the Clean Water Healthy Habitat initiative should be improved to address tribal concerns around impacts to cultural resources.
 - The County agreed that mapping can be improved and will follow-up on how best to address the concerns related to those efforts.
- To address health disparities in the County, the initiative would benefit from a clearer connection to human health resiliency outcomes related to reduced toxic loading, climate resilience, and human health benefits -- not just clean water performance outcomes.
- The County is facing many challenges that will require significant investment and will be unable to do them all at the same time. The Clean Water Healthy Habitat planning effort seems to be all about prioritizing those investments. It appears that the Clean Water Healthy Habitat Strategic Plan seeks to prioritize activities and investments necessary to achieve the best public and ecological health outcomes in a cost-effective manner within the context of meeting regulatory compliance over time, rather than avoiding regulatory obligations. The process may identify current regulatory requirements and associated compliance approaches that carry an unnecessarily high cost and would benefit from alternative approaches, but hopefully those alternative approaches to current obligations are the exception, not the rule.
- The cost and activity information provided in slide 16 suggests the County is directly comparing the County’s projected 10-year \$9.5B investments (driven by wastewater asset management and current requirements) with the County’s approximately \$11B of unmet needs as they relate to salmon recovery, fish passage, on-site septic repair, county-wide stormwater retrofits, and land conservation initiative acquisitions. The graphical presentation of the cost data suggests a direct comparison when, in reality the data provided in each triangle is not comparable; the team should make clear these items are not being compared or work to make them appropriately comparative.
- By working across internal and external silos, it is possible to solve multiple challenges and needs with creative solutions, and hopefully the Clean Water Healthy Habitat initiative can drive that creativity.

Actions Analysis Results: Advisory Group Key Areas of Interest

As determined by Advisory Group member feedback submitted via the post-Meeting #8 input opportunity and one-one-one calls with the facilitator, key areas of the Advisory Group's Action-related interest fall into three categories – costing, pollutant loading, and collaboration and partnership requirements. In this session, the County provided in-depth information on its assumptions and approach to analyzing Actions relative to these three key areas.

Following each presentation, Advisory Group members shared questions and comments on the County's assumptions and approaches related to Actions analysis. These questions and observations, as well as responses from the Clean Water Plan team, are summarized below. County responses provided via this summary (i.e., not in the meeting) are noted accordingly.

In the meeting and in a follow-up email, Advisory Group members were invited to submit additional questions and comments to the facilitation team via email. A question submitted post-meeting, and the corresponding response from the County, is noted in *italics*. Please also reference [Attachment 1: Post-Meeting #9 Attributed Comments](#) for comments submitted on behalf of an organization in response to the information shared by the County in this session.

Costing

- Many datasets use methodologies that allow determination of a variation around a mean. Is this possible around the Actions cost estimates?
 - Cost estimates are considered pre-class 5 with an accuracy range of (-50%/+300%) on the American Association of Costing Engineers International cost estimating classification. This class of cost estimate and associated accuracy range is appropriate and considered proper practice for a long-range planning effort, such as the Clean Water Plan. An example of appropriateness is that the information available for Actions cost estimates varies greatly, therefore the accuracy range is applied.
- Are increased costs due to climate change impacts (e.g., sea level rise, flooding, carbon pricing) included in internal costs and/or external costs?
 - The cost estimates largely reflect internal costs. There is an Action specific to sea level rise. This Action describes external costs to businesses (e.g., saltwater intrusion in the Duwamish River) qualitatively, but does not monetize them.
- How will you identify the non-monetized costs when sharing Action information with the public?
 - Where there is too much uncertainty to provide a monetized cost, non-monetized costs are expected to be described as qualitative outcomes. [response provided post-meeting]
- Some Actions are energy intensive, while others are not. It would be helpful to have a way to visualize the energy intensity of Actions, which comes at a cost for the region.
 - Agree this would be helpful. The County intends to present annual electricity and natural gas use of Actions as a Sustainability outcome. [response provided post-meeting]
- How has the County estimated its maximum rate revenues and other potential revenue sources?
 - At this stage of the planning process, the team is focused on estimating costs; funding and financing will be included in the Strategies discussions. Possible revenue sources include the Wastewater Utility Fund, the base rate, capacity charge, and bonds.

- The revenue mix should also include assumptions about low-interest loan and grant funding (e.g., those available via the federal Water Infrastructure Finance and Innovation Act).
 - The team will look to apply assumptions on loan and grant options such as these. The levels of this type of funding available to the County in past decades will inform those assumptions.
- Looking at the "building scale onsite treatment" Action, it doesn't make sense to monetize Operations & Maintenance (O&M) for WTD but not for external parties.
 - For the Action related to decentralized treatment at a satellite plant, the County is assuming that those decentralized facilities would be owned and operated by WTD, so costs are counted as O&M incurred by WTD.
 - For the Action related to building scale onsite treatment, there are external costs borne by developers and/or owners related to construction and ongoing O&M. These costs are estimated and expressed within the Action as external costs to the region. The team will clarify how those costs are characterized when presenting costs.
- For the decentralized Action example, how do you factor in the resiliency benefit that the Action provides?
 - The resilience benefits are described qualitatively – they are not monetized.
- At minimum, there should be some multiplier for decentralized treatment regulatory oversight. How will Department of Health and others need to scale up to manage the oversight of a decentralized network of private facilities, rather than a single centralized facility?
 - Agree, there will be costs for regulatory oversight. The costs presented with the Action seek to define an estimate of what would be required to implement the Action. The estimate has an accuracy range of -50% to +300% as noted above. Should an Action emerge through the process as an element of a Strategy or Preferred Strategy that Action would be subject to further examination and sensitivity analysis. Specifically, where costs and the relative impact of the cost on the Action or an entity such as the agency providing regulatory oversight would be further examined. [response provided post-meeting]
- *Is the County talking about reduced maintenance costs for homeowners? Are we talking about homes previously on septic might/or will have the opportunity to convert to sewer?*
 - *Like the response immediately above, these costs are acknowledged at this time and would be looked at more closely should an on-site septic decentralized or sewer connection advance into the Strategies or Preferred Strategy. [response provided post-meeting]*

Several members also had observations and questions related to inflow and infiltration (I/I).

- How are you incorporating the scalability of I/I into the Actions graphics?
 - Scalability is possible for several Actions, I/I included. The team is analyzing that now as the County moves into Strategy formulation. Actions are not meant to be stand-alone, and adjustments to scale can be made.
- It's more economical to address very leaky areas, and there are diminishing returns associated with those that are less so. How would you approach optimization within I/I in terms of costs and benefits?
 - Yes, it is more economical to address very leaky sewers. King County and the cities and sewer districts have current programs in place that work at addressing the very leaky sewers. The Actions in the Clean Water Plan are exploring systemwide long term

approaches to reducing I/I over time. These programs seek to address I/I prior to an area becoming very leaky. [response provided post-meeting]

- Reducing I/I also has benefits to CSOs. Are you thinking about cross-activity benefits too?
 - Yes, where there are co-benefits, those will be noted. [response provided post-meeting]
- I/I is a huge issue, very scalable, and different for each of the component agencies. There should be more discussion of it.
 - Agree. As noted in response above, Actions in the Clean Water Plan are exploring systemwide long term approaches to reducing I/I over time. These Actions would scale investments over time with the goal of reducing I/I. [response provided post-meeting]

Pollutant Loading

- How are the concepts of magnitude or acute concentrations addressed? Not all pollution threats and impacts (such as swimming or harvesting) occur in response to an annual load.
 - The temporal component of Actions will be a key part of how they are integrated into Strategies. The team is working to understand both the impact of Actions on water bodies as well as the timing. Causal models take into account the timing and magnitude of Actions.
- How is the County flagging Actions that treat both the known specific pollutants already measured as well as pollutants of emerging concern?
 - The team is calculating quantitative pollutant load reductions, but those calculations are difficult for pollutants about which not much is known. The Action characterizations note multiple benefits where and when identified, and potential impacts on pollutants of emerging concern are discussed qualitatively.
- The Clean Water Plan lacks human health endpoints as considered in the [Washington Environmental Health Disparities Map](#). Right now, the Water Quality Benefits Evaluation (WQBE) toolkit covers decreased human health disparities that are tied to water quality, such as edible fish, edible shellfish, and swimmable water. The team should refine its causal models to be more expansive to human health outcomes tied to hydrology- and community-based pathways (e.g., increased resilience to chronic flooding and the physical/mental health impacts of that) and identify solutions that may influence other human health endpoints.
 - Appreciate this point. The team will consider how impacts to other human health endpoints may be reflected when assessing Strategies. [response provided post-meeting]
- The extent to which an Action “makes a difference” in terms of reducing the impact of pollutant loads depends on which community and location you are referencing (e.g., winter surfers at Golden Gardens as compared to those fishing in the Duwamish River).
 - There is no simple response to this, and it speaks to the complexity of water quality outcomes. The team hopes that the regional conversation on the Clean Water Plan will provide community and regional perspectives to inform what outcomes the County should prioritize.
- The County should determine whether to use unit-area loads or event-mean concentrations times flow to estimate pollutant loading. There is no one right answer, but it is important to consider early on in pollutant loading assessments.
 - The County’s WQBE team is building a technical review panel where this kind of nuanced input is welcome. Advisory Group members may join the technical review panel, if desired. The Clean Water Plan team has also provided this feedback to the WQBE team.

Collaboration and Partnerships Requirements

- The WA State Legislature is currently considering [SB 5087/HB 1184](#) that is relevant to decentralized concepts at the building scale.
- What is the County's role in distributed (i.e., decentralized) solutions?
 - The County is looking to first answer the question of whether decentralization can be part of how the region manages wastewater produced at homes and businesses. A more decentralized approach would take a coordinated effort and, if it emerges as a priority for the region, the County would consider how best to set up those efforts over the planning horizon of the Clean Water Plan.
- Many Actions rely on other component agencies paying for them. Not estimating those costs incurred by other entities is problematic.
 - The costs for decentralized Actions reflect what the total cost (to both King County and the region) would be. The team is making assumptions about what the authorizing environment would be, and the analysis is first determining whether a decentralized approach would be more efficient for the region. If the analysis points to an opportunity for greater efficiency, that would prompt more conversations about how to integrate with partners towards a more cooperative, decentralized approach in the future.
- Every Action considered should have a cost estimate that captures total cost to the region. The concept of silo-breaking should be applied to cost estimating – a lot of costs and revenues appear to not currently be accounted for.
 - The team will look into how to better account for all costs – those both internal and external to WTD.
- What is the regulatory pathway for suburban areas to be mandated to create sewer connections, and is that likely to happen in the next ten years?
 - Seattle-King County Public Health monitors on-site septic systems and can require a failing system to hook up to a sewer (when that's an available option) or fix the septic system. A local sewer utility can also work with a city to create a local improvement district. [Post-meeting, the County provided the following clarification: There are some areas throughout the Urban Growth Area that are not sewered. In some cases, these areas are densely clustered on-site septic systems. Per the Growth Management Act, these areas are eligible for sewer service and areas within the Urban Growth Area are to have urban services. Therefore, King County assumes that these areas will one day be part of the regional wastewater system. The timing of when these areas become connected to sewer is uncertain and dependent on a variety of factors.]

Actions External Engagement: Compiling and Sharing the Action Details and Analysis

In this session, the County introduced two regional engagement efforts planned for Spring 2021 – the Actions Technical Workshops (March-May) and the release of an Actions Document (March-April). The goal of these two efforts is to provide regional audiences with a better understanding of the 35 Actions the County has characterized and to prepare interested and impacted parties to engage in the Strategies phase of the planning process. Advisory Group members made the observations listed below.

- The Action names seem to have changed over time; if the concepts have changed, the County should provide an explanation as to how the Actions to be discussed at the workshop differ from those previously discussed.
 - In response, the County acknowledged that the Advisory Group has seen working titles in previous materials and confirmed that the concepts that they represent remain the same, despite different wording. The team has in fact used Advisory Group input to revise Action titles.
- From a communications standpoint, the Actions need better titles to distinguish them from each other and make them more accessible to all audiences. For example, the distinction between “expanded” and “far-reaching” pollution source control is not clear.
 - The team is working on refining these working titles for each Action to make them more clear, distinct, and reflective of plain language as we prepare them for a larger external audience. Advisory Group members will likely see slightly different names through the Actions Technical Workshops and Actions Document later this spring.
- All three Actions Technical Workshops have wet weather elements, but that might miss opportunities to get input on decision areas such as Pollution Source Control/Product Stewardship, Legacy Pollution, etc.
 - The County provided clarification that the proposed topics for the three technical workshops are designed to cover all 35 actions either individually or in groups and will include Pollution Source Control and Product Stewardship, and Legacy Pollution in addition to Wastewater Treatment and Wet Weather Management actions.
- The County should specify “sewage” or “stormwater” in its descriptions (e.g., does conveyance refer to sewage conveyance, stormwater conveyance, or combined sewage and stormwater conveyance?).
 - Appreciate this input. The team will incorporate this input as titles are refined. [response provided post-meeting]
- Will the workshops be collecting input for potential refinement of actions?
 - Over the course of the Clean Water Plan process to date, the team has evolved and fine-tuned the 35 Actions based on what we’ve learned and what we’ve heard from the community, local agencies, and elected officials. A primary purpose of the Actions Technical Workshops is to inform interested parties on the “why and what” of the Actions to equip them to engage in an upcoming conversation about Strategies. There will be an opportunity to ask questions about the Actions in a Q&A format within the workshops, however the workshops will not include a formal feedback opportunity for participants to further comment on the Actions. Any further input received will be considered by the team as the Actions are combined to form Strategies. [response provided post-meeting]

Next Steps in the Clean Water Plan Process & the 2021 Advisory Group Meeting Schedule

The facilitation team reiterated that the County is focusing the next few months on sharing more Actions-level details to help the region prepare for engaging in discussion on the Strategies, and they encouraged Advisory Group members to review the Actions Document and attend the Actions Technical Workshops in the coming months.

The team will follow up to schedule Meeting #10 (estimated to be held May/June 2021) and to share other 2021 meeting schedule information.

Closing Comments

At the end of the meeting, DNRP leadership thanked the Advisory Group for their time and effort in this process, particularly the time members spent to share feedback in one-on-one check-ins with the facilitator, and for their substantive questions and comments during the Meeting #9 discussion.

Attendees

Advisory Group

NAME	Title	Organization	Attendance 2/4
Monty Anderson	Building Trades Board Member	King County Labor Council/Building Trades	Present
Lori Blair	Engineer/Strategist	Boeing	Present
Josh Brown	Executive Director	Puget Sound Regional Council	Present
Caia Caldwell	External Relations Manager	Master Builders Association of King and Snohomish Counties	Present
Adrian Dominguez	Scientific Director	Urban Indian Health Institute	Absent
Jessie Israel	Puget Sound Director	The Nature Conservancy	Present
Jay Manning	Board Chair; Vice Board Chair	Puget Sound Partnership	Present
Ben Marre	Drainage & Wastewater Planning and Program Management Division Director	Seattle Public Utilities	Present
John McClellan	Engineering and Development Director	Alderwood Water and Wastewater	Present
Rachel McCrea	NW Section Manager	Department of Ecology	Present
Bud Nicola	Affiliate Professor	University of Washington	Present
Bridget Ray	Director of Strategic Partnerships	Na'ah Illahee Fund	Present
Mindy Roberts	Puget Sound Program Director	Washington Environmental Council	Present
Randy Shuman	Affiliate Associate Professor	Oceanography, University of Washington	Present
Anne Udalo	Board Member	League of Women Voters	Present
Ken Workman	Former Council Member	Duwamish Tribe	Present

King County and Clean Water Plan Staff

NAME	TITLE
Christie True	Department of Natural Resources and Parks Director
Mark Isaacson	Wastewater Treatment Division Director
Josh Baldi	Water and Land Resources Division Director
Sonia-Lynn Abenojar	Clean Water Plan Regional Engagement Project Manager
Steve Tolzman	Clean Water Plan Program Manager and Planning Project Manager
Tiffany Knapp	Clean Water Plan Planning Project Manager and Alternate Program Manager
Susan Kaufman-Una	WTD Project Resources Unit Manager
Abby Hook	Environmental Affairs Officer
Joe Hovenkotter	Tribal Government Relations Officer
Rebecca Singer	WTD Resource Recovery Section Manager
Amina Kadir	WTD Clean Water Plan Team Member
Ian McKelvey	Brown and Caldwell – Clean Water Plan Consultant
Chris Cleveland	Brown and Caldwell – Clean Water Plan Consultant

NAME	TITLE
Elizabeth Lowell	HDR, Inc – Clean Water Plan Consultant

Facilitators – Ross Strategic

NAME	TITLE
Rob Greenwood	Principal
Jennifer Tice	Senior Associate
Lauren Dennis	Associate

Attachment 1: Post-Meeting #9 Attributed Comments

Per Section F.3 of the Clean Water Plan Advisory Group Charter, while meeting summaries do not attribute perspectives, Advisory Group members can submit attributed comments to the County separately. The following comments were submitted by an Advisory Group member on behalf of an organization after Meeting #9 and in response to the Actions-related information shared by the County during that meeting.

Submitted on behalf of the Master Builders Association of King and Snohomish Counties (MBAKS):

Thank you for beginning initial discussions about the County's approach to action costing. MBAKS would like to submit comment regarding external cost considerations.

As the Plan moves forward, and if ultimately approved, MBAKS respectfully requests that funding is not diverted from other active projects, such as the Sammamish Northern Diversion Project, in order to fund a new, centralized wastewater treatment plant if that is an action the County moves forward with.

MBAKS requests that other regional projects retain necessary funding to meet timely project milestones through completion. This will help ensure our regional system has the capacity to keep pace with population and economic growth. This is especially vital given our region's significant lack of housing supply, choice, and affordability, and the imbalance of jobs and housing and equitable housing, education, and employment opportunities.

- County's response: Thank you for the comment. The specific example in the comment of a decision on wastewater conveyance and wastewater treatment prioritization and choices that result in prioritizing one investment in front of another is representative of the tough decisions the Clean Water Plan is working through. As the planning process moves forward and the Strategies are presented and then the Preferred Strategy is assembled, these choices will be illustrated for the region to discuss.