



# Metropolitan Water Pollution Abatement Advisory Committee

King Street Center, 201 South Jackson Street, MS KSC-NR-0512  
Seattle, WA 98104 206-263-6070

## 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*

*City of Issaquah*

*City of Kent*

*City of Kirkland*

*City of Lake Forest Park*

*Lakehaven Utility District*

*City of Mercer Island*

*Midway Sewer District*

*Northeast Sammamish Sewer District*

*Northshore Utility District*

*Olympic View Water and Sewer District*

*City of Pacific*

*City of Redmond*

*City of Renton*

*Ronald Wastewater District*

*Sammamish Plateau Water and  
Sewer District*

*City of Seattle*

*Skyway Water and Sewer District*

*Soos Creek Water and Sewer District*

*Southwest Suburban Sewer District*

*City of Tukwila*

*Val View Sewer District*

*Vashon Sewer District*

*Woodinville Water District*

0508\_MWWPAACtrhd.eps

July 11, 2008

The Honorable Julia Patterson, Chair  
King County Council  
Room 1200  
C O U R T H O U S E

RE: King County's Reclaimed Water Feasibility Study, March 2008

Dear Councilmember Patterson:

The Metropolitan Water Pollution Abatement Advisory Committee (MWWPAAC) would like to take the opportunity to provide comments on King County's recently published Reclaimed Water Feasibility Study. After reviewing the Feasibility Study, we offer the following comments:

MWWPAAC found shortcomings within the Feasibility Study that raise questions with the conclusions made in the study. We understand county staff considers the Feasibility Study to represent one part of a continuum in developing King County's reclaimed water program. The next step in this continuum is the development of a Reclaimed Water Comprehensive Plan (Comprehensive Plan). This Comprehensive Plan will provide greater analysis and assessment on the practical application of reclaimed water. So rather than focusing on the shortcomings in the Feasibility Study MWWPAAC has elected to move forward and identify elements that we believe are critical to a successful Comprehensive Plan. The critical elements include the following:

1. **The Comprehensive Plan needs to clearly articulate what specific issue or problem that reclaimed water might help address.** For example, augmenting potable water supply, reducing wastewater pollutant loading into Puget Sound, or augmenting stream flows. All of the seven agencies listed in the feasibility study as having developed a reclaimed water program, had specific objectives their reclaimed program was developed around. MWWPAAC believes this is the key to having a successful reclaimed water program.

All three of the current water resource challenges noted in the Feasibility Study and listed below, are overly broad and do not provide sufficient guidance to develop a successful reclaimed water program.

- Protecting and enhancing surface water quality through improved wastewater management.
- Protecting and enhancing threatened and endangered (T/E) species and the integrity of the region's aquatic and riparian ecosystems.
- Ensuring the adequacy and reliability of the region's water resources.

2. **For each specific issue identified in item 1 above, all reasonable alternatives to address the issue must be evaluated.** Because of the very limited public funding available to address the region's multitude of issues from transportation, public education, and environmental protection and restoration, it is imperative that we as public stewards, spend those limited funds as efficiently as possible. Therefore, it is critical that when looking at a specific regional issue, all viable alternatives are considered. This will help assure that the best alternative to addressing the regional issue is selected. For example, reducing wastewater discharges to Puget Sound. Various options along with reclaimed water that should be evaluated would include altering the treatment options at all of the treatment plants to eliminate pollutants in the effluent, thus reducing pollutant loadings into Puget Sound. Care should be taken when the issue of water supply is evaluated; King County needs to make sure they evaluate all viable alternatives. Many of the existing agencies responsible for providing potable drinking water have or are developing additional supplies to meet demand well into the future. King County should not use limited public funds to address an issue that is already being addressed.
3. **Reassess the Reclaimed Water Program goals and existing policies.** The Mission and Vision stated within the Feasibility Study in chapter 8.2 seems to imply King County is to develop a reclaimed water program regardless of the cost or alternatives to addressing public health and the environment. MWPAAC believes there is a place for beneficial use of reclaimed water, but the specific program should be based on sound analysis and implemented only where it is clearly demonstrated that reclaimed water is the best solution. The existing reclaimed water policies were developed as part of the Regional Wastewater Services Plan, but the environment is significantly different from when the policies were first developed. MWPAAC believes it is critical that as part of the Comprehensive Plan the assumptions and policies be re-evaluated under the current environment.
4. **Use realistic values in any economic analysis.** Any economic analysis should be based on sound financial assumptions to assure that the selection of alternatives will in fact result in the best decisions and assure good investments for our customers and citizens. MWPAAC questions some of the assumptions made in the Feasibility Study, such as 150-days of irrigation in an average year, and using 1-inch of rain per day for average daily irrigation rates. If the assumptions are overly optimistic, it will lead to incorrect conclusions that could have significant financial implications, and lead to selecting an inappropriate solution. Another example of questionable financial analysis is the existing agreement with the

Willows Run Golf Course. The pricing structure is not designed to recover costs, and thus our sewer ratepayers are subsidizing the private golf course.

5. **Assess benefits and costs for addressing specific regional issues to the appropriate constituents.** All seven agencies listed in the Feasibility Study as having developed a reclaimed water program allocated costs to the specific benefited constituents. For water supply, costs are allocated to water rate payers. Costs for reducing wastewater discharge are allocated to wastewater ratepayers. In the case of the Lacey, Olympia, Tumwater and Thurston County (LOTT) Alliance, costs associated with reducing wastewater discharge are allocated to wastewater ratepayer; however, any costs to use reclaimed water for other purposes are paid by others, not by LOTT.

King County is looking to expand the use of reclaimed water for much different purposes than has been used by the seven agencies listed in the Feasibility Study. Therefore, a new financial model must also be considered so that costs are paid by the benefited constituents. There are a number of cities, including Burien, Des Moines, Duvall, Fall City, Federal Way, Hunts Point, Maple Valley, Normandy Park, North Bend, Preston, Sammamish, SeaTac, Skykomish, and Yarrow Point who provide their own treatment and are therefore not part of King County's wastewater treatment system. Property owners in these cities do not pay county wastewater rates. If costs for non-wastewater issues such as stream augmentation are allocated to county wastewater customers, then only a portion of the benefited constituents would be paying for this non-wastewater benefit. Property owners within these cities, and property owners on septic systems would not pay, thus increasing the financial burden on county wastewater customers.

6. **MWPAAC does not believe King County should expand any existing reclaimed water projects until after completion of the Comprehensive Plan.** There should be sufficient support to justify the expenditure of public funds for any projects undertaken by public agencies. MWPAAC does not believe the county has done sufficient analysis of the issues and alternatives that would warrant moving forward with any reclaimed water project. No new work should be done until after the Comprehensive Plan is completed.
7. **Provide sufficient time to allow staff to conduct a thorough and complete Comprehensive Plan.** We believe that King County's deadline for completing the Feasibility Study by the end of 2007 did not provide the Wastewater Treatment Division (WTD) adequate time to complete a thorough and complete feasibility study. In fact, pages 1-2 of the feasibility study in Chapter 1.1, paragraph 4, states: "The scope of the study and the amount of time during which it had to be completed did not enable WTD to develop a comprehensive long-term financial business plan, also called for in WRP-2." As the county moves forward with the Comprehensive Plan, we would hope the King County Council would agree to a timeframe that allows for WTD to do a complete and thorough plan.

The Honorable Julia Patterson

July 11, 2008

Page 4

MWPAAC looks forward to working closely with the Wastewater Treatment Division staff, the Regional Water Quality Committee, the King County Council, and the Executive in the development of the Reclaimed Water Comprehensive Plan. MWPAAC shares the county's desire to have a thorough and complete Reclaimed Water Comprehensive Plan that truly provides a clear vision and realistic opportunities for beneficial use of reclaimed water. MWPAAC believes our comments will help achieve that goal.

Sincerely,

A handwritten signature in cursive script, reading "Scott Thomasson". The signature is fluid and extends to the right with a long, sweeping underline.

Scott Thomasson,  
MWPAAC Chair

cc: The Honorable Ron Sims, King County Executive  
King County Councilmembers  
Operating Budget, Fiscal Management, and Select Issues Committee  
Regional Water Quality Committee Members