



King County
Department of
Natural Resources and Parks
Director's Office
King Street Center
201 S. Jackson St, Suite 5700
Seattle, WA 98104-3855

September 17, 2021

KyMBER Waltmunson
County Auditor
King County Council
Room 1033
COURTHOUSE

Dear Ms. Waltmunson:

Thank you for the opportunity to review and comment on the Capital Projects Oversight Office review of the draft management letter for the Department of Natural Resources and Parks (DNRP), Wastewater Treatment Division (WTD) Clean Water Plan process and products developed to date. We appreciate the opportunity to work with your office to provide information and discuss issues related to this important and complex comprehensive planning process.

In our review of the draft management letter, DNRP has noted that the project principal auditor has identified themes and concerns that mostly center around ensuring policy makers have the information needed to make informed decisions. These concerns include:

- Ensuring transparency around actions and strategies,
- Identifying risks and challenges of regulatory concerns associated with implementing a preferred strategy,
- Providing sufficient cost detail for potential actions, and
- Ensuring that strategies result in best water quality outcomes.

The work of the Clean Water Plan is a comprehensive, regional decision-making process. WTD is working very closely with our regulators, partner agencies and stakeholders to make sure that all partners and decision makers are fully informed throughout the planning process. Actions and strategies will be fully vetted with regional partners, and input sought prior to any evaluation and development of a preferred strategy. Our process has adapted to provide additional opportunities for agency and stakeholder involvement to help ensure transparency at every stage, and we remain committed to this goal.

We understand the concern regarding the challenges of evaluating alternatives within the current regulatory framework and possible future regulatory changes. To achieve a better water quality outcome, while complying with current regulations, policy makers may need to consider possible modifications to regulations. The Clean Water Plan is exploring investment decisions that would result in the best water quality outcomes without constraints, including regulatory constraints, to inform policy makers. DNRP and our regional partners believe that this approach has the potential for better outcomes, recognizing the opportunity to explore modernization of regulatory programs that have been in place for decades and may provide a

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broader range of options for consideration when determining a preferred strategy. The draft management letter also speculates on the outcome and implications of specific regulatory issues like the draft General Permit for Nutrients and may limit the range of options that our legislative branch could consider.

DNRP supports having cost detail for the potential strategies. Over time, our internal processes have been updated and refined to provide cost estimates that are supported by widely accepted industry standards. Thus far, we have provided planning level detail on cost estimates. The cost estimates provided to date are within those industry standards and guidelines. Work on providing more detailed cost estimates is underway and will progress as our planning process continues, and as actions, strategies, and projects are more clearly defined.

WTD recognizes that one specific current strategy will not necessarily be selected as, nor determine the content of, the final preferred strategy. Work on alternatives will be supported by considering elements of several strategies and regional input to develop the Executive's preferred strategy for consideration by the King County Council. We appreciate the additional feedback provided by your office on this subject and will certainly take this into consideration as strategies are developed for evaluation.

We will be working with the Capital Projects Oversight Office through continuous communications and updates as we continue to move forward through the next steps of the planning process. The implementation of the Clean Water Plan will require substantial work including additional assessments, program development, and project permitting processes. We look forward to working with you as we move toward final steps and adoption of the Clean Water Plan.

If you have any questions regarding our responses, please contact Kamuron Gurol, Wastewater Treatment Division Director, at 206-549-1190 or kgurol@kingcounty.gov.

Sincerely,

DocuSigned by:

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Christie True

Director

Enclosure

cc: Kamuron Gurol, Director, Wastewater Treatment Division, Department of Natural Resources and Parks
Ben Thompson, Deputy County Auditor, King County Council (KCC)
Zainab Nejati, Project Principal Auditor, KCC