



City of Bellevue

Eleanor Ott, P.E.
Washington State Department of Ecology
PO Box 47696
Olympia, WA 98504-7696

August __, 2021

Subject: Washington State Department of Ecology's draft Puget Sound Nutrient General Permit

Dear Ms. Ott:

The City of Bellevue (Bellevue) supports Ecology's goal to improve water quality in Puget Sound for a healthy marine environment and human use and enjoyment. However, we do not have sufficient information to support the Puget Sound Nutrient General Permit (Permit) as presently proposed. Bellevue believes more work still needs to be done before the Permit can be implemented successfully.

I am writing to share Bellevue's concerns with Ecology's draft Permit. Specifically, the City is concerned about (1) the uncertain water quality benefits to be derived from the Permit, and (2) the cost impacts to our residents and businesses.

The Permit may not provide the desired water quality benefits. Bellevue believes additional water quality analyses should be performed to better understand and address the root sources depriving Puget Sound waters of dissolved oxygen needed by marine life. It is Bellevue's understanding that focusing on discharges from wastewater treatment plants may address only a small fraction of the sources contributing nitrogen to surface waters. Additional study would allow for a broader suite of solutions and alternatives to effectively increase dissolved oxygen in Puget Sound.

The proposed Permit will have significant cost impacts on Bellevue sewer ratepayers. We need to maintain affordable sewer services in Bellevue, and Ecology should assess the fiscal impacts of the Permit to ensure decision-makers and the public are well informed about the costs to residents and businesses.

While Bellevue does not own a wastewater treatment plant, the City contracts with King County for wastewater treatment services. Regional sewer costs are the single largest cost driver for Bellevue's Sewer Utility, accounting for approximately 56 percent of its annual expenditures. King County anticipates the proposed Permit will significantly increase regional wastewater treatment costs, by as much as \$27 billion in capital expenditures and more than \$11 million in

annual staffing costs based on their initial high-level estimates. As a result, Bellevue residents and businesses could see significant increases in their sewer bills, making this essential service potentially unaffordable for many in our community.

Thank you for your consideration of our comments and concerns. Again, the water quality of Puget Sound is very important to the City of Bellevue. However, we believe it is important to delay issuance of the Permit until sufficient time is taken to thoroughly understand the problems and possible solutions to ensure measurable and sustainable improvements to water quality in Puget Sound, and its fiscal impacts to residents and businesses are evaluated.

If you have any questions, please feel free to contact Nav Otal at 425-452-2041.

Sincerely,

Lynne Robinson, Mayor

cc: Brad Miyake, City Manager
Nav Otal, Utilities Director