## PUGET SOUND NUTRIENT GENERAL PERMIT ADVISORY COMMITTEE

## Notes from the Planners' Discussion August 11, 2020

<u>Invited planners in attendance</u>: **Brent Baldwin/Rob Johnson** (Bellingham), **Katrina Knutson** (Gig Harbor), **Joyce Phillips/Jeremy Graham** (Olympia), **Angie Sylva** (Kitsap Co), **Phil Williams** (Edmonds)

AC members in attendance: Jeff Clarke (WAWSD), Joe Grogan (Coupeville), Patrick Kongslie (Pierce Co), Mark Sadler (Everett), Valerie Smith (COM), Jenny Wu (EPA)

<u>AC alternates in attendance</u>: **Abby Barnes** (WDNR), **Lisa Dennis-Perez** (LOTT), **Teresa Peterson** (Tacoma), **Terri Prather** (LOTT), **Kai Shum** (EPA)

Ecology staff in attendance: Eleanor Ott, Karen Dinicola, Kelly Ferron

Others in attendance: Katherine Brooks (Pierce County), Shannon McClelland (AWC), Stella Vakarcs (Kitsap Co), and several unidentified others who called in

Ecology's permit writer gave a brief overview of the nutrient-related water quality problems in Puget Sound, the regulatory drivers for this permit, and what progress is anticipated over the first three 5-year permit terms. The planners were asked to discuss: "Knowing now that the Clean Water Act requires plants to reduce nutrient loadings, and that this regulation is coming, what do planners need, in what sequence, by when in order to include necessary improvements in their 2024 Comprehensive Plan updates?"

<u>Planners need</u>: a better understanding of what will be the impacts on plants related to their ability to accommodate projected local growth, regional growth goals, and support county wide planning policies; what are the expectations for 6- and 20-year capital plans; and impacts to affordable housing. It is hard to anticipate what the required plant upgrades will be and where the priorities lie. Jurisdictions currently have long term plans which were developed to assure that their communities have the infrastructure to support projected growth. Those jurisdictions are concerned that new regulations that reduce existing treatment plant capacities will leave them without the ability to accommodate that growth.

The permit writer asked if it would help the planners to have best- and worst-case scenario cost estimates from the facilities, e.g., to achieve concentrations of 10 mg/L and 3 mg/L. Tacoma's utility staff reported that such a plan would need more than monthly monitoring data and it could take two years and approximately \$200K plus additional monitoring and laboratory costs to conduct a study for one of their plants and do modeling that provides sufficiently reliable cost estimates. Utility staff suggest that care be taken not to rush this effort. Ecology's permit writer suggested Class IV/V planning estimates would be appropriate for the first permit term. Then the pre-work would be done for the second permit term engineering reports and design work.

The planners from Gig Harbor and Kitsap County both said that it would be helpful to evaluate the range of possible impacts to particular plants and the likely costs. Knowing the full range of possible 20-year costs will allow communities to provide more meaningful input back to Ecology.

Bellingham has been preparing for these upgrades and may be looking at \$500M, the community's largest ever construction cost. Ecology's permit writer will share out the 2011 TetraTech report evaluating costs of nutrient removal technologies. Planners appreciate more similar info if available.

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<u>Concerns</u>: If jurisdictions cannot pay for these upgrades it will introduce uncertainty for future growth allocations and development patterns. This will impact the local economy. Need to maintain ability to use current plant capacity and to show that future necessary upgrades are affordable. Want to avoid a situation where urban areas cannot provide connections, which results sprawl in rural areas where septic systems are common. The GMA encourages urban, not rural, growth – but the goal cannot be met if it becomes increasingly unaffordable to live in urban areas.

<u>Timing/sequencing</u>: New growth projections are coming next year, and 2024 Comp Plan updates are required for all plan elements, not just sewer. A realistic plan is needed. Interim targets will help forward progress.

How are we expected to prevent the water quality problem from getting worse in the first permit term? Ecology's permit writer said that plants will be expected to use adaptive management to achieve as much as possible in the short term. Planning is for the long term. Kitsap County (echoed by Gig Harbor) is concerned about the impact now, the near-term actions required, and the 2024 update horizon. Sewer plans have helped the GMA succeed in assuring that dense development not be accommodated outside the designated urban areas.

Additional needs: Ecology should provide support/leadership in providing outreach to the development community and citizens who will ultimately be impacted through higher sewer rates, to provide context for local discussions. What would the rates be under the "bookend" scenarios? Ecology, Commerce, and AWC should help local governments track any GMA-related bills under consideration and engage in their discussion. Consider more work with other GMA committees.

<u>Takeaways</u>: The facilitator provided this brief summary of key themes from the discussion:

- Because targets are not yet known, some "bookending" of future requirements will be helpful to planners making 2024 Comprehensive Plan updates
  - o It could take about two years to conduct a study that provides sufficiently reliable cost estimates; care should be taken not to rush this effort
- Some type of analysis of impacts to affordable housing would also be helpful
- Outreach to the building community is needed

The participants agreed those themes captured the overall discussion. They expressed appreciation for the opportunity and would like to have more such discussions in the future.