



King County

Department of Natural Resources and Parks

Wastewater Treatment Division

King Street Center, KSC-NR-0512
201 South Jackson Street
Seattle, WA 98104-3855

September 24, 2008

Wes Jorgenson
Chair, Engineering and Planning Subcommittee
Metropolitan Water Pollution Abatement Advisory Committee
201 South Jackson Street
MS KSC-NR-0512
Seattle, WA 98104

Dear Mr. Jorgenson:

I am writing in response to a request you made at the September 3, 2008 meeting of the Engineering and Planning Subcommittee (E&P Subcommittee) of the Metropolitan Water Pollution Abatement Advisory Committee (MWPAAC). At the meeting you requested King County Wastewater Treatment Division (WTD) prepare a detailed response to MWPAAC's July 11, 2008 letter commenting on the Reclaimed Water Feasibility Study and identifying elements to include in the Reclaimed Water Comprehensive Plan. The July 11 letter raises seven important points. I have listed the points in bold below and provided a response following each point. Where applicable, I have described the general method and timing for how WTD expects to address each issue. It is important to note that WTD is only three months into a planned two-year process to prepare a Draft Reclaimed Water Comprehensive Plan. While we want to be responsive to your request for a more specific response to your letter we also do not want to create the impression that we already have an expected outcome. As information is developed during the two-year planning process, there will be time to further discuss these points with the E&P Subcommittee in the monthly meetings that have been scheduled to ensure MWPAAC is fully involved in Reclaimed Water Comprehensive Plan planning process.

1) **The Comprehensive Plan needs to clearly articulate the issue or problem that reclaimed water might help address**

We agree that the Reclaimed Water Comprehensive Plan (Plan) should identify and articulate the issues, problems, and opportunities that reclaimed water can help address in the region both now and into the future.

WTD receives inquiries regularly from water purveyors, local jurisdictions, recreational interests, and other entities about potential reclaimed water opportunities and about the

availability of reclaimed water. The division needs to respond in a consistent manner that makes sense for the regional wastewater system. The Plan is needed to establish a framework and develop policy guidance that will allow WTD to respond to and evaluate requests and opportunities to grow the existing reclaimed water program in a systematic way.

Other issues facing WTD are increasing pressure to reduce wastewater effluent discharge volumes and pollutant loadings in Puget Sound. The Washington State Department of Natural Resources, for example, requires us to report on progress to reduce discharges into Puget Sound from the Brightwater outfall (now under construction) with each NPDES permit renewal. WTD sees this requirement and other current regional discussions, such as the work of the Puget Sound Partnership, as an indication that more stringent discharge requirements are likely to occur in the future. The Plan is needed to identify alternatives to marine discharges to help us prepare for the potential for more stringent requirements in the future.

In addition to these issues, WTD will examine population growth, climate change, and other changes that are expected to exacerbate water quality and water resources.

2) Evaluate all reasonable alternatives to address identified issues in the Plan

The Plan will identify and prioritize uses for reclaimed water and develop and evaluate alternative ways that reclaimed water can be provided to meet those uses. We recognize that there may be other solutions to help address identified needs, and where applicable we will identify alternatives that could achieve similar benefits as reclaimed water. WTD does not have the expertise to analyze every alternative that might potentially meet an identified need for reclaimed water. Nor does WTD have the authority to provide and implement every alternative such as regulatory changes in groundwater and stormwater management. Right now we plan to consult the comprehensive plans of local jurisdictions and water and sewer districts to see if and how they are planning to address any of the needs identified in the Plan and incorporate information from those plans as well as information gathered through meetings and discussions.

WTD is committed to continue working with the E&P Subcommittee on this issue. Work to identify the alternatives to reclaimed water that achieve the same benefits will be done during the alternatives analysis portion of the planning process. I look forward to further discussing this point at future E&P Subcommittee meetings.

3) Reassess Reclaimed Water Program goals and existing policies

Development of the Reclaimed Water Comprehensive Plan provides an opportunity to reevaluate existing RWSP reclaimed water policies. Evaluating the existing program goals and policies will occur throughout the planning process. The most substantive discussions are expected during the alternatives analysis portion of the work. The planning process will result in new and more up-to-date information about effluent management and reclaimed

water that will inform the development of new policies. I look forward to the E&P Subcommittee's involvement in this area.

4) Use realistic values in economic analysis

Thank you for your suggestions and observations about the assumptions that were included in the Reclaimed Water Feasibility Study. We agree that the economic analysis must be based on sound assumptions. The Reclaimed Water Comprehensive Plan development process will include an economic analysis following the WaterReuse Foundation Framework for Evaluating the Benefits and Cost of Water Reuse. The economic analysis will include stakeholder input. One of the early steps WTD will take in the analysis is to list the cost and benefits of reclaimed water that include per unit value estimates. This list will be reviewed by stakeholders including the E&P Subcommittee. The value estimates will then be used to complete the economic analysis. In following the framework methodology, assumptions, omissions, biases, and uncertainties will be shared with stakeholders. I hope that this process will result in the use of sound assumptions that are shaped by stakeholder input.

5) Assess benefits and costs for addressing specific regional issues to the appropriate constituents

An essential component of developing the Reclaimed Water Comprehensive Plan will be development of a financing plan and policies to allocate costs associated with implementing the Plan's recommended alternatives. The cost of producing and distributing reclaimed water was identified as the main concern in the local agency interviews that were carried out as a part of the Feasibility Study. As mentioned above, an economic analysis following the WaterReuse Foundation's Economic Framework will be completed during the planning process. This will be a useful tool to help identify and quantify the range of benefits of a reclaimed water project, which in turn will help us answer the questions and develop policies to guide who pays, how much, and why.

6) MWPAAC does not believe King County should expand any existing reclaimed water projects until after completion of the Comprehensive Plan

King County's reclaimed water program has been in existence for over 10 years. To make use of the investments WTD has made for reclaimed water, it is important that the existing program continue to seek out additional reclaimed water customers for projects built or being built. Facilities, decisions, and agreements supporting the existing program will continue to be carried out in accordance with existing policies in the RWSP, state law, and any associated permits. The existing program includes reclaimed water production for use onsite and offsite at South Treatment Plant, onsite uses at West Point Treatment Plant, for wetland enhancement at the Carnation Treatment Facility, and offsite uses from the south segment of the Brightwater reclaimed water pipeline. Depending on the outcome of the Reclaimed Water Comprehensive Plan, the existing program may need to be modified to be consistent with the new Plan.

7) **Provide sufficient time for staff to conduct a thorough and complete Comprehensive Plan**

I appreciate your concern that WTD has enough time to produce a thorough and complete Reclaimed Water Comprehensive Plan. I believe we can complete a Draft Plan that reflects stakeholder input and acceptance within the two-year timeframe.

Thank you for raising these points. I look forward to MWPAAC's continued involvement and engagement in the development of the Plan.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Buscher". The signature is fluid and cursive, with the first name "Mark" being more prominent than the last name "Buscher".

Mark Buscher
Project Manager
Reclaimed Water Comprehensive Plan

cc: MWPAAC Members