



King County

1200 King County
Courthouse
516 Third Avenue
Seattle, WA 98104

Meeting Agenda

Regional Water Quality Committee

3:00 PM

Wednesday, December 4, 2024

Hybrid Meeting

Pursuant to K.C.C. 1.24.035 A. and F., this meeting is also noticed as a meeting of the Metropolitan King County Council, whose agenda is limited to the committee business. In this meeting only the rules and procedures applicable to committees apply and not those applicable to full council meetings.

The Committee will accept public comment on items on today's agenda in writing. You may do so by submitting your written comments to kcccomitt@kingcounty.gov. If your comments are submitted before 8:00 a.m. on the day of the meeting, your comments will be distributed to the committee members and appropriate staff prior to the meeting.

HOW TO WATCH/LISTEN TO THE MEETING REMOTELY: There are three ways to watch or listen to the meeting:

- 1) Stream online via this link: www.kingcounty.gov/kctv, or input the link web address into your web browser.
- 2) Watch King County TV on Comcast Channel 22 and 322(HD) and Astound Broadband Channels 22 and 711(HD).
- 3) Listen to the meeting by telephone.

Dial: 1 253 215 8782

Webinar ID: 827 1536 1574

To help us manage the meeting, please use the Livestream or King County TV options listed above, if possible, to watch or listen to the meeting.

1. Call to Order

2. Roll Call

To show a PDF of the written materials for an agenda item, click on the agenda item below.

3. Approval of Minutes p. 3

November 6, 2024 meeting minutes

	<p>Sign language and interpreter services can be arranged given sufficient notice (206-848-0355). TTY Number - TTY 711.</p> <p>Council Chambers is equipped with a hearing loop, which provides a wireless signal that is picked up by a hearing aid when it is set to 'T' (Telecoil) setting.</p>	
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4. Chair's Report**5. MWPAAC Report**

John McClellan, Chair, MWPAAC

6. Wastewater Treatment Division (WTD) Report

Kamuron Gurol, Director, Wastewater Treatment Division, Department of Natural Resources and Parks

Briefings**7. [Briefing No. 2024-B0125](#) p. 6**

Regional Wastewater Services Plan (RWSP) Update: Follow-up from September 4, 2024 Discussion on Scope of Work for the RWSP Update and Next Steps

Kamuron Gurol, Director, Wastewater Treatment Division, Department of Natural Resources and Parks

Darren Greve, Government Relations Administrator, Wastewater Treatment Division, Department of Natural Resources and Parks

Janice Johnson, RWSP Update Program Manager, Wastewater Treatment Division, Department of Natural Resources and Parks

8. [Briefing No. 2024-B0124](#) p. 61

Puget Sound Nutrients Briefing

Jacque Klug, Nutrient Management Coordinator, King County Wastewater Treatment Division

Verna Bromley, Senior Deputy Prosecuting Attorney, Prosecuting Attorney's Office

9. [Briefing No. 2024-B0042](#) p. 74

2024 Regional Water Quality Committee (RWQC) Work Plan

Jenny Giambattista, Council staff

Other Business**Adjournment**

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Meeting Minutes Regional Water Quality Committee

Councilmembers:

Claudia Balducci, Chair
Reagan Dunn, Dave Upthegrove
Alternate:

Sound Cities Association: Conrad Lee, Bellevue, Vice Chair;
Sarah Moore, Burien;
Laura Mork, Shoreline; Jessica Rossman, Medina

Alternates: Kelli Curtis, Kirkland; Yolanda Trout Manuel,
Auburn

Sewer/Water Districts: Chuck Clarke, Woodinville Water
District; Lloyd Warren, Sammamish Plateau Water District
Alternate: Ryika Hooshangi, Sammamish Plateau Water

City of Seattle: Joy Hollingsworth, Robert Kettle
Alternate: Rob Saka

Lead Staff: Jenny Giambattista (206-477-0879)
Committee Clerk: Blake Wells (206-263-1617)

3:00 PM

Wednesday, November 6, 2024

Hybrid Meeting

REVISED AGENDA - DRAFT MINUTES

1. **Call to Order**

Chair Balducci called the meeting to order at 3:02 PM.

2. **Roll Call**

Present: 11 - Balducci, Clarke, Dunn, Lee, Mork, Moore, Rossman, Warren, Kettle,
Hooshangi and Trout-Manuel
Excused: 2 - Upthegrove and Hollingsworth

3. **Approval of Minutes**

Councilmember Kettle moved approval of the September 4, 2024 and October 2, 2024 meeting minutes. There being no objections, the minutes were approved.

4. **Chair's Report**

Chair Balducci provided an overview of the agenda.

5. MWPAAC Report

John McClellan, Chair, MWPAAC, provided updates on recent and upcoming MWPAAC meetings and identified areas of interest on this RWQC agenda.

6. Wastewater Treatment Division (WTD) Report

Kamuron Gurol, Director, Wastewater Treatment Division, Department of Natural Resources and Parks, briefed the committee on policy issues, proposed capital improvement projects, grants applied for by the Wastewater Treatment Division, and the Regional Wastewater Services Plan working group and answered questions from the members.

Briefings**7. [Briefing No. 2024-B0085](#)**

Regional Wastewater Services Plan

Darren Greve, Government Relations Administrator, Wastewater Treatment Division, Department of Natural Resources and Parks, briefed the committee via PowerPoint presentation and answered questions from the members. Kamuron Gurol, Director, Wastewater Treatment Division, Department of Natural Resources and Parks, also answered questions from the members.

8. [Briefing No. 2024-B0123](#)

2025 Proposed Budget for Wastewater Treatment Division

Jenny Giambattista, Council staff, briefed the committee and answered questions from the members. Courtney Black, Finance Manager, Wastewater Treatment Division, Department of Natural Resources and Parks, and Kamuron Gurol Director, Wastewater Treatment Division, Department of Natural Resources and Parks, answered questions from the members.

9. [Briefing No. 2024-B0042](#)

2024 Regional Water Quality Committee (RWQC) Work Plan

Chair Balducci reviewed progress on the work program.

Other Business

Chair Balducci inquired of members in regards to an in-person meeting on December 4, 2024. The RWQC will hold a hybrid meeting with in-person and Zoom attendance options on December 4, 2024. Chair Balducci also advised members that the January, 2025 RWQC meeting will be a special meeting.

Adjournment

The meeting was adjourned at 4:12 PM.

Approved this _____ day of _____

Clerk's Signature

RWSP Update: Scoping Document and Comment Matrix

Regional Water Quality Committee
December 4, 2024



Draft Schedule to Update the RWSP



**Early Project Tasks
(Scoping, Charter)**



**Vision for Clean Water
(including Challenges and
Opportunities document)**



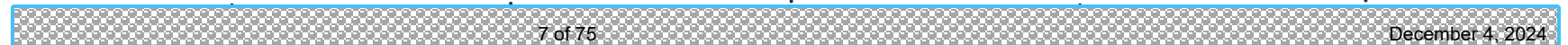
Financial Policies



**Capital Program Plan, EIS
and Policies**



Regional Engagement



Scoping Document Evolution

April 2024: Proposed monthly policy review process of King County Code (KCC) 28.86

May 2024: Reviewed KCC 28.86.040 (Policy Application) and KCC 28.86.050 (Treatment Plant Policies); Identified issues to consider in scope of effort

June 2024: Continued discussion of KCC 28.86.050 (Treatment Plant Policies)

July 2024: Continued discussion of KCC 28.86.050 (Treatment Plant Policies); Identified new approach to combine all issues/policy considerations into a scoping document

Scoping Document

Sept. 2024: Draft scoping document presented to RWQC and MWPAAC

The **Scoping Document:**

- Describes the overall approach to update the plan and some of the major policy issues that will be analyzed
- Designed to spark discussion and conversation

Comments on the document received from RWQC, MWPAAC, Districts, and Sound Cities Association

Oct. 2024: Comment matrix shared with RWQC

Revised Scoping Document

- Reviewed 119 comments and worked to integrate all substantive comments into the revised scoping document
- The revised scoping document addresses comment themes, such as:
 - Putting visioning early in the process
 - Defining equity and affordability terms
 - Framing policy questions so they are policy and not technical
 - Identifying link between policies and contracts
 - Deferring early code updates

Next Steps

- Revised scoping document will inform the RWSP Update planning process and future project documents

Discussion



King County | Wastewater Treatment

Thank you

Janice Johnson

RWSP Update Program Manager

Janice.Johnson@kingcounty.gov



King County | Wastewater Treatment

DRAFT Scoping Document for Updating the Regional Wastewater Services Plan

Revised Draft Prepared by WTD for Discussion - November 2024

Introduction

This draft scoping document describes the overall approach that will be used, and some of the major policy issues that will be analyzed, to update King County’s Regional Wastewater Services Plan (RWSP). The document was produced to solicit input and feedback on the scope of the RWSP Update from members of the Regional Water Quality Committee (RWQC) and the Metropolitan Water Pollution Abatement Advisory Committee (MWPAAC).

The King County Wastewater Treatment Division (WTD) drafted this scoping document based on initial verbal and written input from RWQC and MWPAAC members and staff as well as feedback obtained during and after the Clean Water Plan process. The scoping document was discussed at the August 28 MWPAAC general meeting, the September 4 RWQC workshop, and the September 5 MWPAAC Engineering and Planning subcommittee meeting. WTD revised the document based on feedback from MWPAAC and RWQC.

The draft scoping document was designed to spark discussion and conversation. Specifically, WTD is interested in hearing about the scope elements and major policy issues that RWQC and MWPAAC would like analyzed as part of the RWSP Update. More detailed scopes of work for specific tasks under the RWSP Update will be developed as needed.

Key Terms

The following key terms are used throughout the scoping document. Because these terms can have different meanings depending on the context, the following definitions apply for purposes of the RWSP and associated materials unless otherwise noted.

Term	Definition
Equity and Social Justice	<i>Equity</i> is defined as the full and equal access to opportunities, power, and resources so that all people achieve their full potential and thrive. <i>Social justice</i> refers to all aspects of justice – including legal, political, economic, and environmental – and requires the fair distribution of and access to public goods, institutional resources, and life opportunities for all people (source: King County Equity and Social Justice Strategic Plan 2016-2022).
Rate Equity	“Rates should be designed to distribute the cost of service equitably among each type and class of service. Non-cost of service rates that achieve certain other objectives such as affordability and water conservation may be considered in some situations.” (source: Revised: AWWA Policy Statement: Financing, Accounting, and Rates – American

	Water Works Association, November 5, 2024).The AWWA Principles of Water Rates, Fees, and Charges Manual states “Rate-making endeavors to assign costs to classes of customers in a nondiscriminatory, cost-responsive manner so that rates can be designed to closely meet the cost of providing service to such customer classes.”
Affordability	“The National Coalition for Legislation on Water Affordability defined water affordability as the cost of provision that does not impede people from meeting other basic needs or human rights. There is, however, currently no one generally accepted definition of water affordability. It varies depending on the purpose of the water affordability assessment... Affordability researchers generally agree that no one single metric can or should be used in measuring water affordability, rather, a variety of quantitative and qualitative data should be considered (source: Schneemann, M., 2019, Defining & Measuring Water Affordability: A Literature Review; Illinois-Indiana Sea Grant).

Background

The RWSP, a supplement to the King County Comprehensive Water Pollution Abatement Plan, was adopted by the King County Council in November 1999 by Ordinance 13680, and the RWSP policies were subsequently codified in King County Code (KCC), Chapter 28.86. The RWSP identifies projects and programs needed to provide wastewater capacity for homes and businesses in King County’s wastewater service area through 2030 and provides policy direction for the operation and continued development of the wastewater system. The RWSP has largely been implemented, and it is now time to update the plan to guide future investments and actions. Changed conditions, including population growth, climate change, aging assets, regulatory requirements, and rate affordability, also justify another major update to the RWSP.

The updated plan, along with the analytical work (e.g., review of the capacity charge) performed as part of the RWSP Update planning process, will support the extension of local agency sewage disposal contracts, many of which expire in 2036, and continue to strengthen WTD’s relationship with local agencies. An update to the RWSP will also help make the case for additional state and federal funding and meet the requirements for a General Sewer Plan update for approval by the Washington State Department of Ecology (Ecology).

The planning process to update the RWSP started in 2019 as the Clean Water Plan; it was paused at the end of 2021 to fully consider and address feedback received during the planning process. The pause in the Clean Water Plan process also provided an opportunity for more regulatory certainty regarding combined sewer overflow (CSO) obligations and nutrient reduction obligations. The planning process restarted in 2024 as the RWSP Update planning effort. The renewed process includes important adjustments intended to address feedback received during the Clean Water Plan process. The current RWSP Update planning process is generally similar to the process used to develop the 1999 RWSP.

Project Objectives

The overall project objectives are to develop a vision for WTD’s future, to develop an update to the RWSP, and to update the policies in King County Code 28.86. The project will define a future vision for the utility that is consistent with WTD’s mission – “We protect public health and the environment by collecting and cleaning wastewater while recovering valuable resources for a healthy and resilient Puget Sound.”

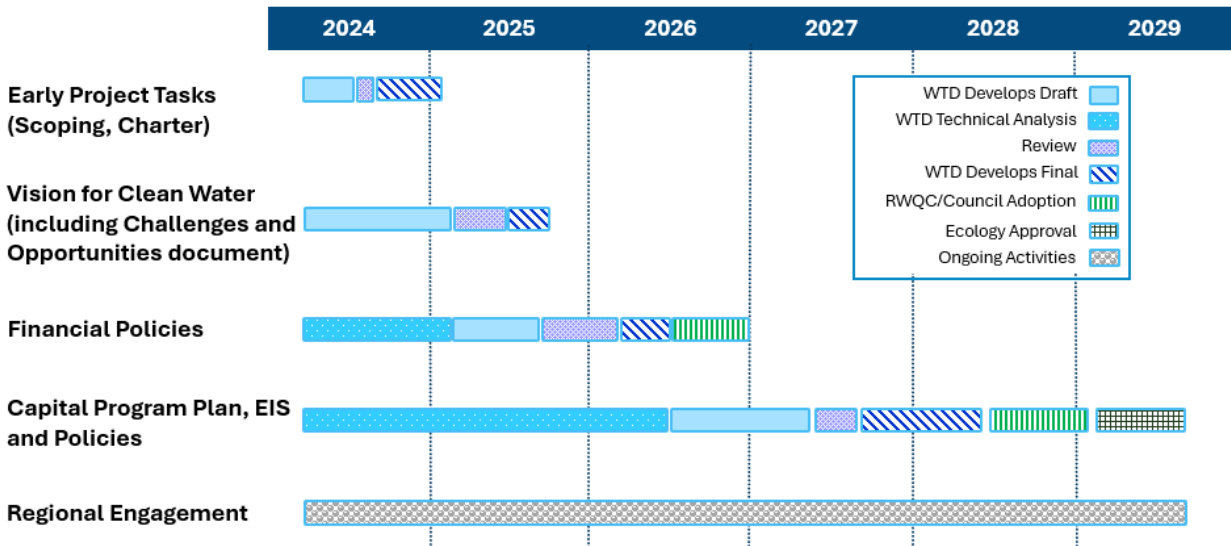
The vision will inform policies and investments that are included in the final RWSP Update. The planning process will produce an RWSP Update that will guide future investments; ensures the core mission to protect water quality; seeks to achieve affordable wastewater utility rates into the future; meets regulatory and legal obligations; and reflects County initiatives including equity and social justice, strategic climate action planning, and Clean Water Healthy Habitat.

The resulting RWSP Update document will include the vision for clean water, a capital investment plan, and policy updates to King County Code for King County Council review and approval. Once adopted by the Council, the document will be transmitted to Ecology for review and approval.

Scope for the Effort

Figure 1 shows the planning process for the RWSP Update. The tasks are also described below with the associated deliverables.

Figure 1. Overall Draft Schedule for Completing the Update to King County’s Wastewater Plan



Tasks/Deliverables

Early Project Tasks – The early project tasks are designed to inform the RWQC and MWPAAC of the scope and objectives of the project and the major policy issues to be addressed as part of the update to the RWSP.

Scoping – Scoping will identify the major issues that will be addressed and the process to address those issues in the effort. The work will include the following:

- Developing a draft scoping document.
- Soliciting feedback on the draft scoping document.
- Finalizing the scoping document.

Timeline: Final completed in 4th quarter 2024.

RWSP Working Group – The Working Group will serve as a forum for MWPAAC and RWQC member staff to collaborate with WTD’s RWSP project team through development and successful adoption of the RWSP update. The Working Group will help guide, shape and influence RWSP work products; and it will serve as one channel for clear communication across key groups, and will report out and receive feedback from MWPAAC and RWQC. The work will include the following:

- Convening a RWSP Working group with members from MWPAAC, RWQC staff, and Sound Cities Association (SCA) and WTD’s RWSP planning staff

Timeline: Formation of Working Group in 4th quarter 2024.

Charter – The charter will serve as a framework for collaboration, partnership, and process between WTD, MWPAAC, and RWQC to update the RWSP. The work will include the following:

- Developing the draft sections of the charter in partnership with the RWSP Working Group
- MWPAAC and RWQC review and input to the charter language
- Finalizing the charter
- Chairs of RWQC and MWPAAC, and WTD Director collective sign the charter as a shared commitment to collaboration and process to guide the effort to update the RRWSP

Timeline: Final completed in 1st quarter 2025.

Vision for Clean Water for Wastewater Services – The Vision for Clean Water for Wastewater Services will articulate the future of WTD and will inform policies and investments that are included in the final RWSP Update. A document describing the challenges and opportunities facing the wastewater industry will be used to shape the vision.

Challenges and Opportunities – This document will summarize the status of major challenges affecting the future of WTD’s wastewater system, projected trends for those challenges in the coming decades, emerging trends and potential opportunities for the future of water-sector utilities, and key questions to be explored in future regional discussions. Challenges and opportunities will inform the scope of work, policy analysis, investment plans, and financial strategies. The work will include the following:

- Reviewing relevant materials developed during the previous Clean Water Plan process.
- Reviewing industry research on drivers and trends.

- Updating information on the regional wastewater system.
- Interviewing national water utility experts and thought leaders.
- Listening sessions with interested and potentially affected parties.
- Developing a draft challenges and opportunities document.
- Soliciting feedback on the draft challenges and opportunities document.
- Finalizing the challenges and opportunities document.

Timeline: Final completed in 1st quarter 2025.

Vision – The vision will articulate the future of WTD. The work will occur in the first stages of the RWSP update process and will include the following:

- Reviewing existing documentation of regional priorities and feedback.
- Conducting interviews and listening sessions to confirm and refresh feedback as well as hear new ideas.
- Drafting several initial vision concepts.
- Conducting broad outreach and engagement to gather feedback on the initial vision concepts and the accompanying challenges and opportunities document.
- Finalizing the vision to be adopted with the RWSP Update.

Timeline: Final completed in 3rd quarter 2025.

Financial Policies – Technical analysis will be performed to provide information to support proposed changes to the financial policies in King County Code 28.86.160. The analysis will consider cost structure and rate equity (including the capacity charge), capital financing and debt management, and financial planning and revenue sufficiency. The work will include the following:

- Studying peer utility agency financial policy structures and evaluating them within a WTD specific context.
- Developing draft policy revisions and seeking review from the RWSP Working Group with members from MWPAAC, RWQC staff, and SCA.
- Finalizing financial policy revisions and developing a proposed ordinance for Council review and approval.

Timeline: Final completed in 4th quarter 2026.

Capital Program Plan, Environmental Impact Statement (EIS), and Policies – Technical analysis will provide the information to support proposed policy changes and WTD's future capital program. The information will be used to develop a draft and final RWSP Update, draft and final EIS, and draft and final policy revisions. The work will include the following:

Technical analysis

- Identifying current/existing conditions in our service area in terms of demographics, the economy, water quality, and wastewater infrastructure.
- Gathering background information on current policies.

- Developing a range of options/strategies for policy questions. All options/strategies will meet legal obligations.
 - **Stay the Course:** Under this strategy, WTD would largely maintain current policies while investing, as needed, to meet current and future regulatory obligations with as little disruption as possible.
 - **Strategic Enhancement:** Under this strategy, WTD would largely maintain current policies but look to enhance or proactively invest in key areas that may include asset management, resource recovery (biosolids, recycled water), and additional treatment capacity.
 - **Pioneering Utility:** Under this strategy, WTD would shift to an even more innovative, future-focused utility, including but not limited to investing earlier in upgraded treatment levels to meet all future legal obligations, eliminating Puget Sound discharges, maximizing resource recovery, proactively managing assets, and actively managing infiltration/inflow (I/I) to the system.
- Evaluating possible policy revisions.
- Identifying the capital projects, including timelines, costs, and rate impacts, associated with the options/strategies.

Draft Plan and EIS

- Conducting State Environmental Policy Act scoping.
- Writing a draft RWSP Update that includes draft projects and policies, along with a draft EIS that describes the environmental impacts associated with the draft RWSP Update.
- Conducting broad outreach and engagement to gather feedback on the draft RWSP Update and draft EIS.

Final Plan and EIS

- Responding to comments and feedback on the draft RWSP Update and draft EIS.
- Selecting among the options/strategies to create a proposed strategy that includes a list of capital projects, timelines, and policy revisions.
- Identifying outcome measures to evaluate progress and measure success.
- Identifying future update schedules and/or triggers.
- Preparing a proposed RWSP Update and final EIS.
- Developing and transmitting to Council an ordinance to adopt the proposed RWSP Update.
- Developing and submitting to Ecology the adopted RWSP Update as a proposed amendment to King County's General Sewer Plan.

Approvals

- Council adopting the RWSP Update.
- Ecology approving the RWSP Update, satisfying WTD's regulatory obligation for an amended general sewer plan.

Timeline: Final completed in 3rd quarter 2029.

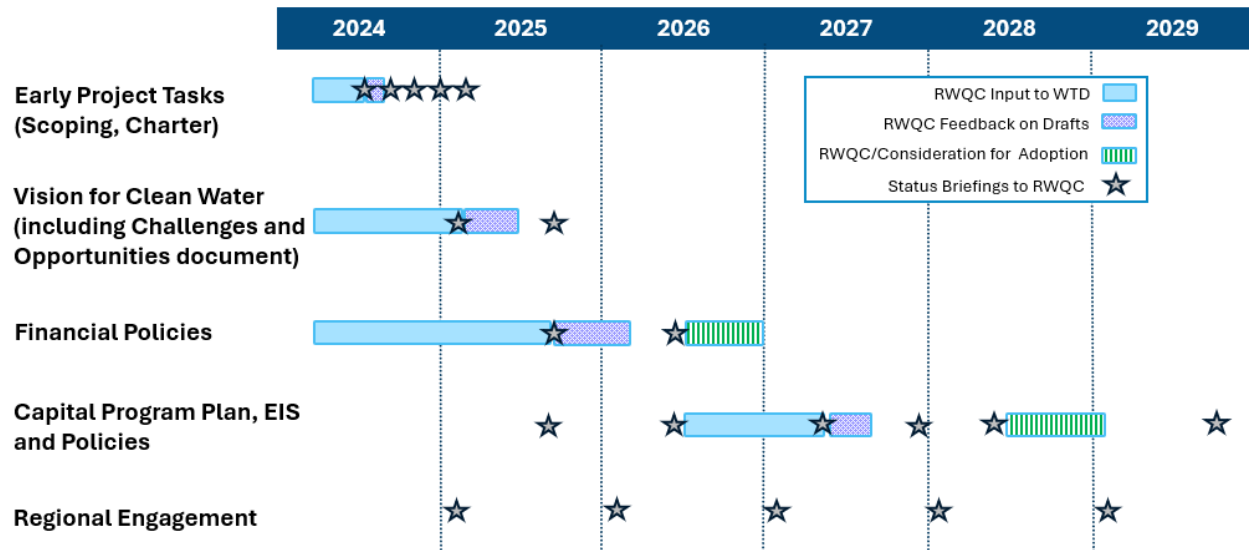
Regional Engagement – Regional engagement throughout the planning process ensures that interested and affected parties are informed and involved with the project. In addition to RWQC and MWPAAC, the following categories of interested and potentially affected parties may be engaged in the process (note: more detailed audience lists will be developed along with work plans and supporting outreach or event plans during each phase):

- Local Jurisdictions and Local Sewer Utilities
- Sound Cities Association
- Wastewater Professionals and industry peers
- Community-Based Organizations (Equity and Social Justice, Immigrant and Refugee, Environmental Justice)
- Environmental Organizations /Nongovernmental Organizations
- Regulators and Resource Managers
- Neighborhood Groups
- Public Health Community-Based Organizations
- Water Resource Organizations
- Ratepayers
- Youth and Students
- Business community
- Agricultural community
- Faith-Based Organizations
- Homeowner Associations
- Labor Unions
- Thought leaders and experts from inside and outside the region

Timeline: Final completed in 3rd quarter 2029.

A specific plan and approach will be developed to engage with Tribal Governments. Figure 2 shows RWQC engagement during the RWSP Update planning effort. RWQC will have an opportunity to provide input before drafts are produced and feedback once drafts are available; WTD will provide status briefings along the way before RWQC is asked to take action.

Figure 2. Draft Summary of RWQC Engagement During Effort to Update King County’s Wastewater Plan



Major Policy Issues and Questions

King County has identified several major decisions regarding the future of our regional wastewater system that will need to be made in this process. To build and operate the large regional system, WTD has a long and growing list of capital projects in the coming decades, with significant forecasted costs. In making these investments, King County needs to consider many issues like our aging wastewater system, population growth, future regulations, water quality goals, energy and resource conservation and recovery, affordability, and climate change.

The update to the RWSP will not include stormwater planning for the region but will instead include how to address stormwater entering the wastewater system. Similarly, the update to the RWSP will not include water supply planning, but will include recycled water, which has a nexus between wastewater and water.

The policy questions in the table below have been grouped into major topics/themes that WTD has identified as known challenges and opportunities for the wastewater sector. Though a question is identified under one topic, it may also intersect with other topics in the table.

Challenges and Opportunities – Topics/Themes	Major Policy Questions to be Analyzed in RWSP Update
<p>Regulatory Landscape</p> <p>CSO, nutrients, per- and polyfluoroalkyl substances (PFAS) and other contaminants of emerging concern (CECs), current and existing requirements, new and anticipated requirements, opportunities for larger regional partnerships to address water concerns, requirement to comply with future total maximum daily loads</p>	<p>Should the County evaluate costs and plan for levels of treatment beyond current legal requirements?</p> <p>How should the County anticipate, engage with, and plan for future nutrient permit requirements, regulations related to CECs such as PFAS, or other future regulatory changes?</p> <p>What upstream or source control actions should the region undertake to prevent contaminants and reduce costs?</p>

Challenges and Opportunities – Topics/Themes	Major Policy Questions to be Analyzed in RWSP Update
	How should WTD efforts support the water quality of Puget Sound and applicable inland waterways?
<p>Capacity Demands</p> <p>I/I, population growth, conveyance and treatment capacity demand, including on-site septic systems in urban areas</p>	<p>Given the uncertainties in future growth rates reported by Washington State and the Puget Sound Regional Council, how aggressively beyond legal requirements should WTD expand capacity to account for future population growth?</p> <p>To what extent should WTD prioritize use of existing facility sites vs. acquiring new property to accommodate future treatment needs (including capacity)?</p> <p>Should the region continue to provide a centralized approach for regional wastewater treatment, or should the region move towards a more decentralized approach?</p> <p>How should I/I be managed and how can costs be fairly apportioned? Should system capacity be expanded to account for increases in I/I? Should I/I policies change to support reducing the capacity needed for I/I?</p> <p>How should the conversion of on-site septic systems to sewers in the service area be managed and should WTD implement programs to encourage conversion within the service area?</p>
<p>Infrastructure Resiliency</p> <p>Asset management, maintenance, improvements, renewal, replacement, labor and supply chain disruptions, natural hazard resiliency</p>	<p>How proactive vs. reactive should WTD be when deciding to refurbish or replace aging infrastructure?</p> <p>What level of resiliency should WTD plan for regarding seismic and other natural hazards to avoid or minimize risks? What level of risk tolerance should WTD accept? How can these considerations be best informed by the long-term capital motion work in progress?</p> <p>What level of redundancy of critical systems should WTD have?</p>
<p>Equity and Social Justice</p> <p>Distributional equity, WTD role in safeguarding public health</p>	<p>What actions should WTD take to increase equity and social justice for the regional wastewater system?</p> <p>How will equity and social justice be interwoven in the update: community engagement, rate structure analysis, etc.?</p>
<p>Climate Change</p> <p>Mitigation – green building, eliminating/reducing fossil fuel use, energy and</p>	<p>Should existing wastewater policy language (KCC 28.86) be revised to specifically call out planning for future climate conditions in addition to population growth and other environmental factors?</p>

Challenges and Opportunities – Topics/Themes	Major Policy Questions to be Analyzed in RWSP Update
<p>water efficiency, renewable energy, materials management, tree planting, etc. Adaptation – sea level rise, more extreme heat, increased storm intensities, wildfire smoke, increased river flooding, etc.</p>	<p>How much should WTD reduce energy use and reduce greenhouse gas emissions?</p> <p>How should WTD prepare and adapt to climate impacts (e.g., precipitation/storm intensities, sea level rise, river flooding, etc.) in line with the Strategic Climate Action Plan? What level of climate impact risk tolerance should WTD plan for to avoid or minimize risks to the system?</p>
<p>Resource Recovery</p> <p>Recycled water, biosolids, energy capture</p>	<p>Energy production and heat recovery – Should WTD be expanding its efforts to capture energy and heat? If so, at what level of effort?</p> <p>Biosolids – Should WTD further expand its efforts to develop Class A biosolids? What changes are needed to biosolid recovery policies to get to Class A?</p> <p>Recycled water – Under what circumstances should the region expand the use of reclaimed water? Which uses (e.g., environmental benefits, groundwater recharge, industrial uses, irrigation) are most appropriate?</p> <p>How can WTD best support environmental benefits while instituting safeguards to protect against environmental risks of contamination? How should cost considerations be weighed?</p>
<p>Finance / Affordability</p> <p>Rate equity, rate structure, capital financing and debt management, financial planning and revenue sufficiency</p>	<p>Is there a better rate structure for the sewer rate? (Note: WTD has identified a work plan to further evaluate the residential customer equivalent conversion factor of 750 cubic feet per month.)</p> <p>Will WTD maintain a single uniform sewer rate per residential customer equivalent (Robinswood “one for all, all for one”), or consider alternative cost recovery rate structures to reflect other system impacts?</p> <p>Should WTD update the rate structure for the capacity charge to align with current industry standards? (Note: The capacity charge rate structure was updated in 2021. A capacity charge methodology study is in progress.)</p> <p>What other rate relief approaches should WTD implement to improve affordability for those who may struggle to pay their sewer bill?</p>
<p>Relationship to Contracts</p>	<p>Are major policy updates aligned with component agency contracts?</p>

Challenges and Opportunities – Topics/Themes	Major Policy Questions to be Analyzed in RWSP Update
	How will WTD implement the RWSP Update consistent with direction and requirements expected of contract agencies?

DRAFT

DRAFT Scoping Document for Updating the Regional Wastewater Services Plan

Revised Draft Prepared by WTD for Discussion - ~~Octo~~November 2024 at RWQC Workshop 9/4/24

Introduction

This draft scoping document describes the overall approach that will be used, and some of the major policy issues that will be analyzed, to update King County’s Regional Wastewater Services Plan (RWSP).

This ~~draft~~ document was produced to solicit input and feedback on the scope of the RWSP Update from members of the Regional Water Quality Committee (RWQC) and ~~members of~~ the Metropolitan Water Pollution Abatement Advisory Committee (MWWPAAC).

~~The King County Wastewater Treatment Division (WTD) drafted this scoping document based on initial verbal and written input from RWQC and MWWPAAC members and staff as well as feedback obtained during and after the Clean Water Plan process. This ~~scoping~~ scoping document was ~~to be~~ discussed at the August 28 MWWPAAC general meeting, and the September 4 RWQC workshop, and the September 5 MWWPAAC Engineering and Planning subcommittee meeting, and possibly at future meetings and workshops. WTD revised the document based on feedback from MWWPAAC and RWQC.~~

~~The draft scoping document was designed to spark discussion and conversation. Specifically, WTD is interested in hearing about the scope elements and major policy issues that RWQC and MWWPAAC would like analyzed as part of the RWSP Update. WTD drafted this document based on initial verbal and written input heard to date from RWQC members and staff, MWWPAAC members, and based on feedback obtained during and after the Clean Water Plan process. The draft document ~~was~~ designed to spark discussion and conversation. A revised version of this ~~WTD revised the document will be presented after~~ ~~based on~~ receiving feedback from MWWPAAC and RWQC.~~

More detailed scopes of work for specific tasks under the RWSP Update will be developed as needed.

Key Terms

The following key terms are used throughout the scoping document. Because these terms can have different meanings depending on the context, the following definitions apply for purposes of the RWSP and associated materials unless otherwise noted.

<u>Term</u>	<u>Definition</u>
<u>Equity and Social Justice</u>	<u>Equity is defined as the full and equal access to opportunities, power, and resources so that all people achieve their full potential and thrive. Social justice refers to all aspects of justice – including legal, political, economic, and environmental – and requires the fair distribution of and access to public goods, institutional resources, and life</u>

	<u>opportunities for all people-</u> (source: <u>King County Equity and Social Justice Strategic Plan 2016-2022</u>).
Rate Equity	<u>“Rates should be designed to distribute the cost of service equitably among each type and class of service. Non-cost of service rates that achieve certain other objectives such as affordability and water conservation may be considered in some situations.”</u> - (source: <u>Revised: AWWA Policy Statement: Financing, Accounting, and Rates – American Water Works Association, November 5, 2024</u>).-The <u>AWWA Principles of Water Rates, Fees, and Charges Manual</u> states <u>“Rate-making endeavors to assign costs to classes of customers in a nondiscriminatory, cost-responsive manner so that rates can be designed to closely meet the cost of providing service to such customer classes.”</u>
Affordability	<u>“The National Coalition for Legislation on Water Affordability defined water affordability as the cost of provision that does not impede people from meeting other basic needs or human rights. There is, however, currently no one generally accepted definition of water affordability. It varies depending on the purpose of the water affordability assessment... Affordability researchers generally agree that no one single metric can or should be used in measuring water affordability, rather, a variety of quantitative and qualitative data should be considered-</u> (source: <u>Schneemann, M., 2019, Defining & Measuring Water Affordability—: A Literature Review; -Illinois--Indiana Sea Grant</u>).

Background

The RWSP, a supplement to the King County Comprehensive Water Pollution Abatement Plan, was adopted by the King County Council in November 1999 by Ordinance 13680, and the RWSP policies were subsequently codified in King County Code (KCC), Chapter 28.86. The RWSP identifies projects and programs needed to provide wastewater capacity for homes and businesses in the King County’s wastewater service area through 2030 and provides policy direction for the operation and continued development of the wastewater system. The RWSP has largely been implemented, and it is now time to update the plan to guide future investments and actions. Changed conditions also justify another major update, including population growth, climate change, aging assets, regulatory requirements, and rate affordability, also justify another major update to the RWSP.[‡]

The updated plan, along with the analytical work (e.g., review of the capacity charge) performed as part of the RWSP Update planning process, An update to the RWSP will support the extension of local agency sewage disposal contracts, many of which expire in 2036, and continue to strengthen King County Wastewater Treatment Division’s (WTD) relationship with local agencies. An update to the RWSP will also help make the case for additional state and federal funding and meet the requirements for a General Sewer Plan update for approval by the Washington State Department of Ecology (Ecology).

‡ Affordability generally refers to the cost of service that does not impede people from meeting other basic needs.

The planning process ~~to update the RWSP~~ started in 2019 as the Clean Water Plan; ~~it, and it~~ was paused at the end of 2021 to fully consider and address feedback received during the planning process. The pause in the Clean Water Plan process also provided an opportunity for more regulatory certainty regarding ~~c~~Combined ~~s~~Sewer ~~O~~verflow (CSO) obligations and nutrient reduction obligations. The planning process restarted in 2024 as the RWSP Update planning effort. ~~The renewed process~~ and includes important adjustments intended to address feedback received during the Clean Water Plan process. The current RWSP ~~U~~update planning process is generally similar to the process used to develop the 1999 RWSP.

Project Objectives

The overall project objectives are to develop a vision for WTD’s future, to develop an update to the RWSP, and to update the policies in King County Code 28.86. The project will define a future vision for the utility that is consistent with WTD’s mission – “We protect public health and the environment by collecting and cleaning wastewater while recovering valuable resources for a healthy and resilient Puget Sound.”

The vision will inform policies and investments that are included in the final RWSP Update. The planning process will produce an RWSP ~~U~~update that will guide future investments; ~~;~~ ensures the core mission to protect water quality; seeks to achieve affordable wastewater utility rates into the future; meets regulatory and legal obligations; and reflects County initiatives including equity, ~~e~~ and social justice, ~~strategic climate action planning, and Clean Water Healthy Habitat.~~ ~~;~~ ~~strategic climate action planning; and clean water, healthy habitat.~~

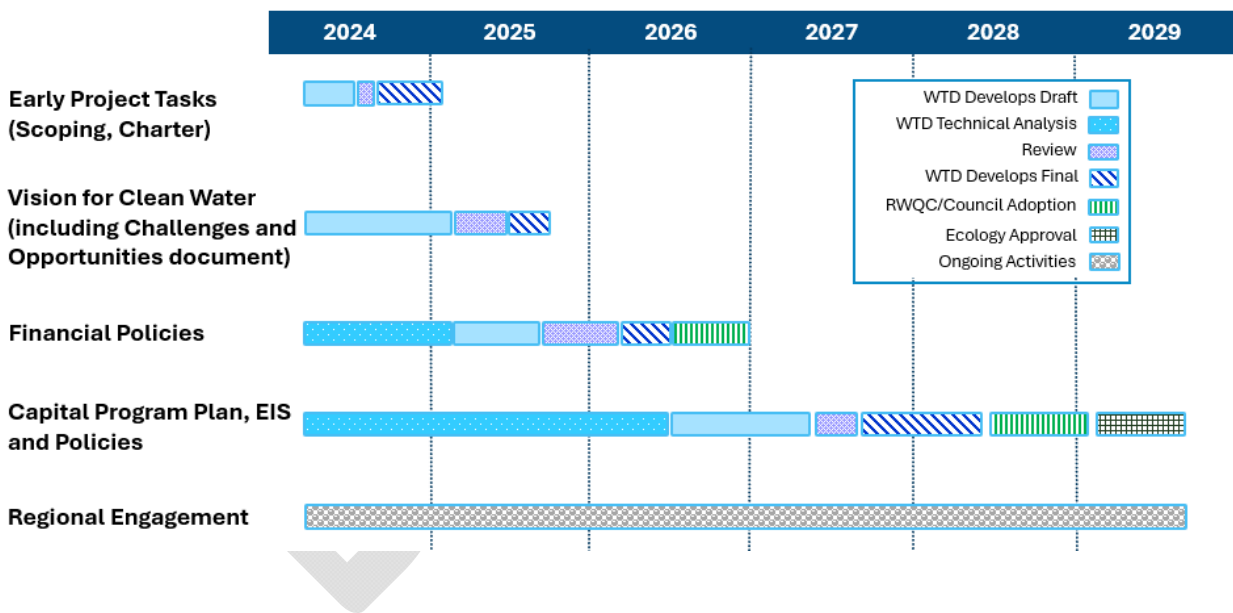
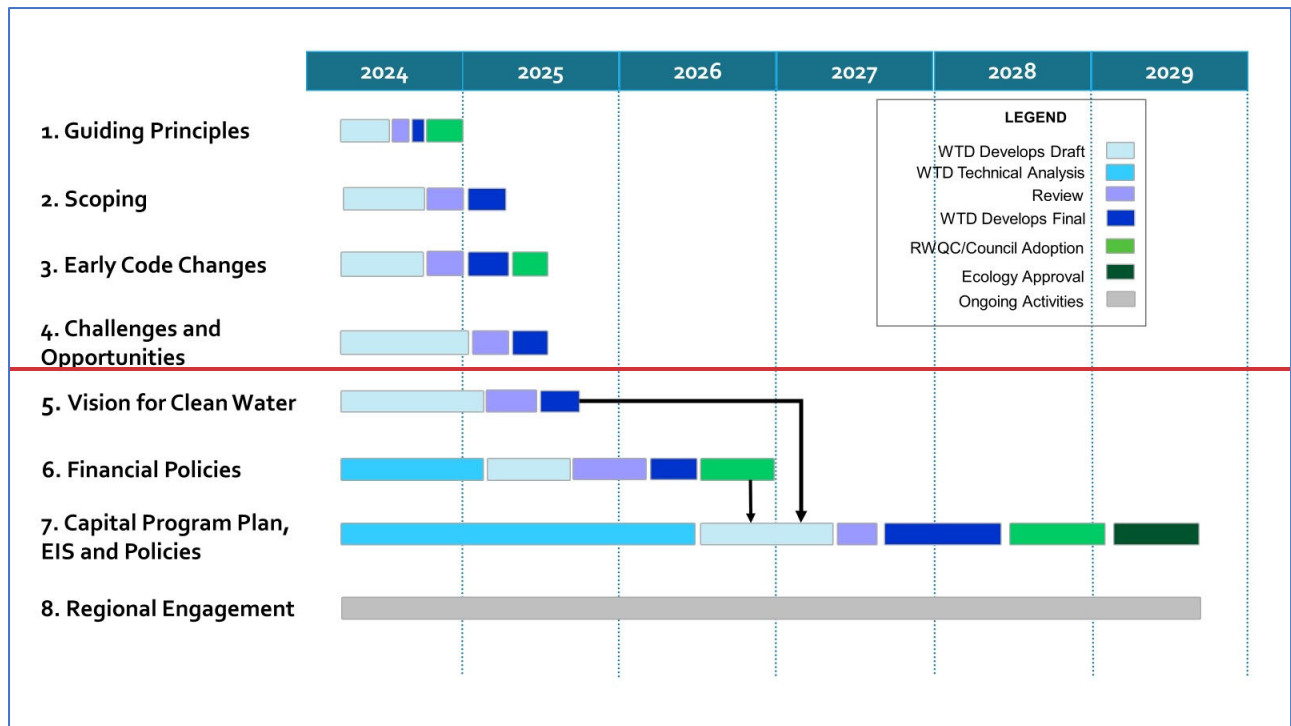
The resulting RWSP Update document will include the ~~V~~ision for clean water, a capital investment plan, and policy updates to King County Code for ~~King County~~ Council review and approval. Once adopted by the Council, the document will be transmitted to ~~the Washington State Department of~~ Ecology for review and approval.

Scope for the Effort

~~Figure 1 shows~~ the planning process ~~for the RWSP Update.~~ The tasks are ~~shown in Figure 1 and~~ also described below with the associated deliverables.

Figure 1. Overall ~~Draft~~ Schedule for Completing the Update to King County’s Wastewater Plan

² ~~Equity is defined as the full and equal access to opportunities, power and resources so that all people achieve their full potential and thrive. Social justice refers to all aspects of justice – including legal, political, economic, and environmental – and requires the fair distribution of and access to public goods, institutional resources, and life opportunities for all people.~~



Tasks/Deliverables

Early Project Tasks – The early project tasks are designed to inform the RWQC and MWPAAC of the scope and objectives of the project and the major policy issues to be addressed as part of the update to the RWSP.

Guiding Principles – The guiding principles will direct the process to update the RWSP and associated policies. The work includes:

- ~~Reviewing feedback from RWQC, component agencies, and interested parties received during the Clean Water Plan outreach process.~~
- ~~Developing draft guiding principles.~~
- ~~Soliciting feedback on draft guiding principles.~~
- ~~Finalizing guiding principles in the form of a resolution for RWQC consideration~~
- ~~Timeline: Final Completed in 4th Quarter 2024~~

Scoping – Scoping will identify the major issues that will be addressed and the process to address those issues in the effort. The work will include the following:

- Developing a draft scoping document.
- Soliciting feedback on the draft scoping document.
- Finalizing the scoping document.

Timeline: Final ~~completed in 4th- Qquarter 2024.5~~

RWSP Working Group – The Working Group will serve as a forum for MWPAAC and RWQC member staff to collaborate with WTD’s RWSP project team through development and successful adoption of the RWSP update. The Working Group will help guide, shape and influence RWSP work products; and it will serve as one channel for clear communication across key groups, and will report out and receive feedback from MWPAAC and RWQC. The work will include the following:

- Convening a RWSP Working group with members from MWPAAC, RWQC staff, and Sound Cities Association (SCA) and WTD’s RWSP planning staff

Timeline: Formation of Working Group in 4th quarter 2024.

Charter – The charter will serve as a framework for collaboration, partnership, and process between WTD, MWPAAC, and RWQC to update the RWSP. The work will include the following:

- ~~Convening a RWSP Working group with members from MWPAAC, RWQC staff, and Sound Cities Association (SCA)~~
- ~~Developing a draft outline of the charter~~
- Developing the draft sections of the charter in partnership with the RWSP Working Group
- MWPAAC and RWQC review and input to the charter language
- Finalizing the charter
- Chairs of RWQC and MWPAAC, and WTD Director collective sign the charter as a shared commitment to collaboration and process to guide the effort to update the RRWSP

Timeline: Final completed in 4th qQuarter 2024/1st quarter 2025.

~~Reviewing feedback from RWQC, component agencies, and interested parties received during the Clean Water Plan outreach process.~~

- ~~Developing draft guiding principles.~~
- ~~Soliciting feedback on draft guiding principles.~~

- ~~Finalizing guiding principles in the form of a resolution for RWQC consideration~~
- ~~Timeline: Final Completed in 4th Quarter 2024~~

Early Code Change Updates – There are a small number of policies that are outdated because the work is complete. The early code change updates will update/revise the policies to reflect completed work. The early code change updates are anticipated to be straightforward and do not require extensive analysis. The work will include the following:

- ~~Developing a list of policies for early code change updates.~~
- ~~Drafting redline/strikeout edits to the identified policies.~~
- ~~Having MWPAAC review the redline/strikeout edits.~~
- ~~Finalizing the edits.~~
- ~~Developing and transmitting to Council an ordinance proposing the early code change updates for adoption.~~

~~Timeline: Final Completed in 2nd Quarter 2025.~~

Challenges and opportunities – This document will summarize the status of major challenges affecting the future of WTD's wastewater system, projected trends for those challenges in the coming decades, emerging trends and potential opportunities for the future of water sector utilities, and key questions to be explored in future regional discussions. Challenges and opportunities will inform the scope of work, policy analysis, investment plans and financial strategies. The work will include:

- ~~Reviewing relevant materials developed during the previous Clean Water Plan process.~~
- ~~Reviewing industry research on drivers and trends.~~
- ~~Updating information on the regional wastewater system.~~
- ~~Interviewing national water utility experts and thought leaders.~~
- ~~Listening sessions with interested and potentially affected parties.~~
- ~~Developing a draft challenges and opportunities document.~~
- ~~Soliciting feedback on the draft challenges and opportunities document.~~
- ~~Finalizing the challenges and opportunities document.~~
- ~~Timeline: Final Completed in 1st Quarter 2025.~~

Vision for Clean Water for Wastewater Services – The Vision for ~~Clean wWater for Wwastewater Sservices~~ will articulate the future of ~~WTD wastewater services~~ and will inform policies and investments that are included in the final RWSP Update. A document describing the challenges and opportunities facing the wastewater industry will be used to shape the vision.

Challenges and Opportunities – This document will summarize the status of major challenges affecting the future of WTD's wastewater system, projected trends for those challenges in the coming decades, emerging trends and potential opportunities for the future of water-sector utilities, and key questions to be explored in future regional discussions. Challenges and

opportunities will inform the scope of work, policy analysis, investment plans, and financial strategies. The work will include the following:

- Reviewing relevant materials developed during the previous Clean Water Plan process.
- Reviewing industry research on drivers and trends.
- Updating information on the regional wastewater system.
- Interviewing national water utility experts and thought leaders.
- Listening sessions with interested and potentially affected parties.
- Developing a draft challenges and opportunities document.
- Soliciting feedback on the draft challenges and opportunities document.
- Finalizing the challenges and opportunities document.

Timeline: Final ~~c~~Completed in 1st Qquarter 2025.-

Vision – The vision will articulate the future of WTD. The work will occur in the first stages of the RWSP update process and will include the following:

- Reviewing existing documentation of regional priorities and feedback.
- Conducting interviews and listening sessions to confirm and refresh feedback as well as hear new ideas.
- Drafting several initial vision concepts.
- Conducting broad outreach and engagement to gather feedback on the initial vision concepts and the accompanying challenges and opportunities document.
- Finalizing the vision to be adopted with the RWSP Update.

Timeline: Final ~~c~~Completed in 3rd Qquarter 2025.

Financial Policies – Technical analysis will be performed to provide information to support proposed changes to the financial policies in King County Code 28.86.160. The analysis will ~~look at~~consider cost structure and rate equity (including the capacity charge), capital financing and debt management, and financial planning and revenue sufficiency.³ ~~(including the capacity charge); capital financing and debt management; and financial planning and revenue sufficiency.~~ The work will include the following:

- Studying peer utility agency financial policy structures and evaluating them within a WTD specific context.
- Developing draft policy revisions and seeking review from the RWSP Working Group with members from MWPAAC, RWQC staff, and SCA. ~~and stakeholders.~~
- Finalizing financial policy revisions and developing a proposed ordinance for Council review and approval.

³ Equity in this context refers to fair/proportionate allocation of costs to customer classes.

Timeline: Final ~~C~~ompleted in 4th ~~Q~~quarter 2026.

Capital Program Plan, Environmental Impact Statement (EIS), and Policies – Technical analysis will provide the information to support proposed policy changes and WTD’s future capital program. The information will be used to develop a draft and final RWSP Update, draft and final EIS, and draft and final policy revisions. The work will include the following:

Technical analysis

- Identifying current/existing conditions in our service area in terms of demographics, the economy, water quality, and wastewater infrastructure.
- Gathering background information on current policies.
- Developing a range of options/strategies for policy questions. All options/strategies will meet legal obligations.
 - **Stay the Course:** Under this strategy, WTD would largely maintain current policies while investing, as needed, to meet current and future regulatory obligations with as little disruption as possible.
 - **Strategic Enhancement:** Under this strategy, WTD would largely maintain current policies but look to enhance or proactively invest in key areas that may include asset management, resource recovery (biosolids, recycled water), and additional treatment capacity.
 - **Pioneering Utility:** Under this strategy, WTD would shift to an even more innovative, future-focused utility, including but not limited to investing earlier in upgraded treatment levels to meet all future legal obligations, eliminating Puget Sound discharges, maximizing resource recovery, proactively managing assets, and actively managing infiltration/inflow (I/I) into the system.
- Evaluating possible policy revisions.
- Identifying the capital projects, including timelines, costs, and rate impacts, associated with the options/strategies.

Draft Plan and EIS

- Conducting State Environmental Policy Act (~~SEPA~~) scoping.
- Writing a ~~D~~raft RWSP Update that includes draft projects and policies, along with a draft EIS that describes the environmental impacts associated with the ~~d~~raft RWSP Update.
- Conducting broad outreach and engagement to gather feedback on the ~~D~~raft RWSP Update Plan and draft EIS.

Final Plan and EIS

- Responding to comments and feedback on the ~~d~~raft RWSP Update and draft EIS.
- Selecting among the options/strategies to create a proposed strategy that includes a list of capital projects, timelines, and policy revisions.
- Identifying outcome measures to evaluate progress and measure success.
- Identifying future update schedules and/or triggers.

- Preparing a ~~p~~Proposed RWSP Update and final EIS.
- Developing and transmitting to Council an ordinance to adopt the ~~p~~Proposed RWSP Update.
- Developing and submitting to Ecology the adopted RWSP Update as a proposed amendment to King County's General Sewer Plan.

Approvals

- Council adopting the RWSP Update.
- Ecology approving the RWSP Update, satisfying WTD's regulatory obligation for an amended general sewer plan.

Timeline: Final ~~C~~Completed in 3rd ~~Q~~Quarter 2029.

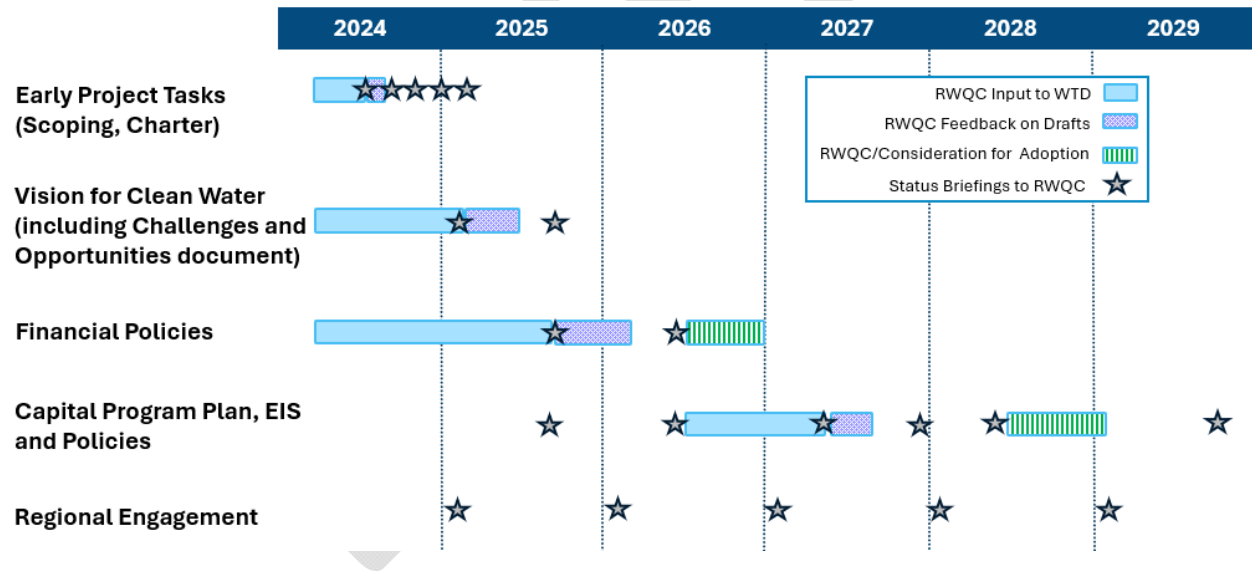
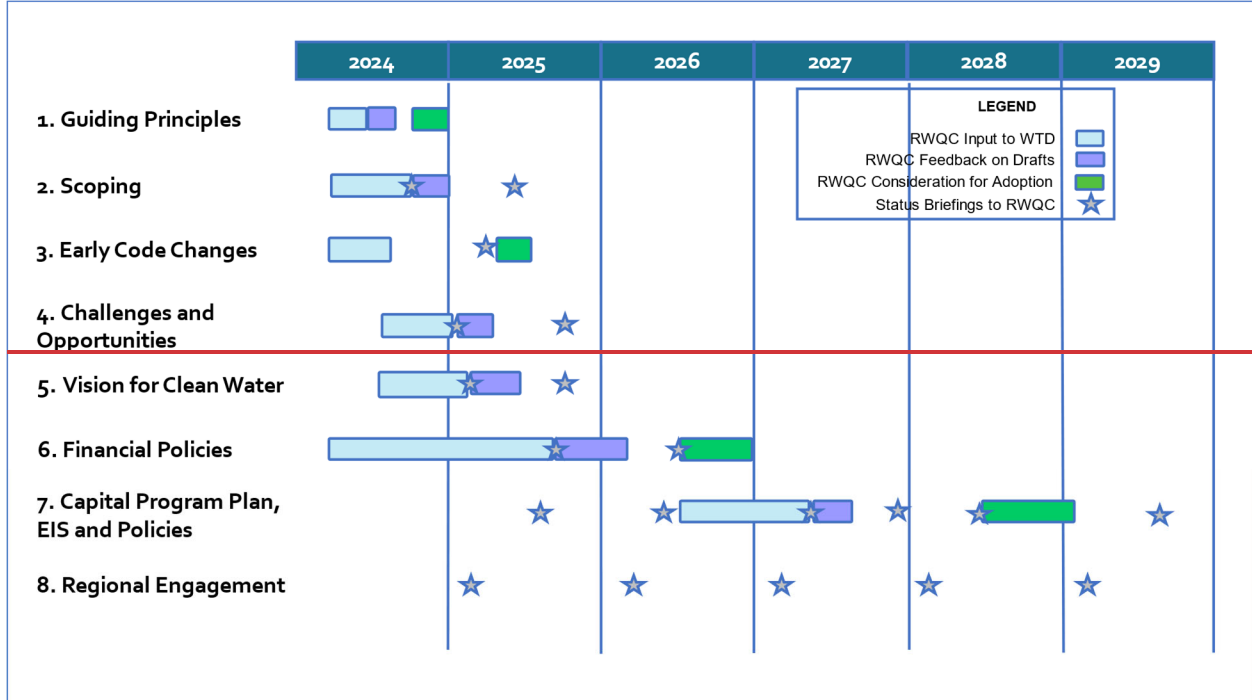
Regional Engagement – Regional engagement throughout the planning process ensures that interested and affected parties are informed and involved with the project. In addition to RWQC and ~~the Metropolitan Water Pollution Abatement Advisory Committee (MWPAAC)~~, the following categories of interested and potentially affected parties may be engaged in the process. ~~(note: m~~More detailed audience lists will be developed along with work plans and supporting outreach or event plans ~~during~~in each phase):

- Local Jurisdictions and Local Sewer Utilities
 - Sound Cities Association
 - Wastewater Professionals and industry peers
 - Community-Based Organizations (Equity and Social Justice, Immigrant and Refugee, Environmental Justice)
 - Environmental Organizations /Non-~~G~~Governmental Organizations (~~NGOs~~)
 - Regulators and Resource Managers
 - Neighborhood Groups
- Public Health Community-Based Organizations
 - Water Resource Organizations
 - Ratepayers
 - Youth and Students
- Business community
 - Agricultural community
 - Faith-Based Organizations
 - Homeowner Associations
 - Labor Unions
 - Thought leaders and experts from inside and outside the region.

Timeline: Final ~~C~~Completed in 3rd ~~Q~~Quarter 2029.

A specific plan and approach will be developed to engage with Tribal Governments. Figure 2 ~~below~~ shows RWQC engagement during the RWSP Update planning effort. RWQC will have an opportunity to provide give input before drafts are produced ~~and, to provide~~ feedback once drafts are available; WTD will provide ~~and to receive~~ status briefings along the way before ~~they~~RWQC is ~~are~~ asked to take action.

Figure 2. Draft Summary of RWQC Engagement During Effort to Update King County’s Wastewater Plan



Major Policy Issues and Questions

King County has identified several major decisions regarding the future of our regional wastewater system that will need to be made in this process. To build and operate the large regional system, WTD has a long and growing [list of capital project list](#) in the coming decades, with significant forecasted costs. In making these investments, King County needs to consider many issues like our aging

wastewater system, population growth, future regulations, water quality goals, energy and resource conservation and recovery, affordability, and climate change.

The update to the RWSP ~~does~~ will not include stormwater planning for the region, but will instead include how to address stormwater entering the wastewater system. Similarly, the update to the RWSP will not include water supply planning, but will include recycled water, which has a nexus between wastewater and water.

The policy questions ~~shown~~ in the table below have been grouped into major topics/themes that WTD has identified as known challenges and opportunities for the wastewater sector. Though a question is identified under one topic, it may also intersect with other topics in the table.

Challenges and Opportunities – Topics/Themes	Major Policy Questions to be Analyzed in RWSP Update
<p>Regulatory Landscape</p> <p>CSO, nutrients, per- and polyfluoroalkyl substances (PFAS) and other contaminants of emerging concern (CECs), current and existing requirements, new and anticipated requirements, opportunities for larger regional partnerships to address water concerns, requirement to comply with future Ttotal Mmaximum ddaily loads (TMDLs)</p>	<p>What types and levels of treatment should be planned for? Should the County evaluate costs and plan for levels of treatment beyond current legal requirements?</p> <p>What assumptions should be made about <u>How should the County anticipate, engage with, and plan for</u> future nutrient permit requirements, regulations related to CECs such as PFAS, or other future regulatory changes?</p> <p>What upstream or source control actions should the region undertake to prevent contaminants and reduce costs?</p> <p><u>How should WTD efforts support the water quality of Puget Sound and applicable inland waterways?</u></p>
<p>Capacity Demands</p> <p>infiltration and inflow (I/I), population growth, conveyance and treatment capacity demand, including on-site septic systems in urban areas;</p>	<p>What is the future capacity needed for growth and when, where and how should we address that need <u>Given the uncertainties in future growth rates reported by Washington State and the Puget Sound Regional Council, how aggressively beyond legal requirements should WTD expand capacity to account for future population growth?</u></p> <p>Beyond the required capacity needed to meet current regulatory and contractual obligations, what level of capacity should be planned for, and what are the cost implications?</p> <p>When addressing capacity, should capacity increases within existing facilities be maximized over acquiring new sites, where possible <u>How aggressively should the region move to build a fourth regional treatment plant to address future capacity, the potential for higher levels of treatment, and to increase system resiliency? To what extent should WTD prioritize use of existing facility sites vs. acquiring new property to accommodate future treatment needs (including capacity)?</u></p>

Challenges and Opportunities – Topics/Themes	Major Policy Questions to be Analyzed in RWSP Update
	<p>Should the region continue to provide a centralized approach <u>for regional wastewater treatment</u>, or <u>should the region move towards a more consider decentralized approach options</u>?</p> <p>How should I/I be managed <u>and how can costs be fairly apportioned</u>? <u>How much of the additional projected flow is coming from I/I versus population growth</u> <u>Should system capacity be expanded to account for increases in I/I</u>? Should I/I policies change to reduce <u>support reducing</u> the capacity needed for I/I?</p> <p>How should the conversion of on-site septic systems to sewers in the service area be managed and <u>what planning assumption should WTD use about the conversion rates</u> <u>should WTD implement programs to encourage conversion within the service area</u>?</p>
<p>Infrastructure Resiliency</p> <p>Asset management, maintenance, improvements, renewal, replacement, labor and supply chain disruptions, natural hazard resiliency.</p>	<p>How <u>proactive vs. reactive</u> and when should WTD <u>be when</u> deciding <u>to refurbish or replace aging infrastructure</u>?</p> <p>What level of resiliency should WTD plan for regarding seismic and other natural hazards <u>to avoid or minimize risks</u>? What level of risk tolerance should WTD accept? <u>How can these considerations be best informed by the long-term capital motion work in progress</u>?</p> <p>What level of redundancy of critical systems should WTD have?</p>
<p>Equity and Social Justice</p> <p>Distributional equity, WTD role in safeguarding public health</p>	<p>What actions should WTD take to increase equity and social justice for the regional wastewater system? (Note: Equity is defined as the full and equal access to opportunities, power, and resources so that all people achieve their full potential and thrive. Social justice refers to all aspects of justice – including legal, political, economic, and environmental – and requires the fair distribution of and access to public goods, institutional resources, and life opportunities for all people.) <u>(Should include definition of equity and social justice and provide more detail on h</u></p> <p><u>How this will equity and social justice be interwoven in the update: community engagement, rate structure analysis, etc.?)</u></p>
<p>Climate Change</p> <p>Mitigation – green building, eliminating/reducing fossil fuel use, energy and water efficiency, renewable energy, materials management, tree planting, etc.</p>	<p><u>What climate experts and data should WTD use to inform planning?</u> <u>Should existing wastewater policy language (KCC 28.86) be revised to specifically call out planning for future climate conditions in addition to population growth and other environmental factors?</u></p>

Challenges and Opportunities – Topics/Themes	Major Policy Questions to be Analyzed in RWSP Update
<p>Adaptation – sea level rise, more extreme heat, increased storm intensities, wildfire smoke, increased river flooding, etc.</p>	<p>How <u>much</u> should WTD reduce energy use and reduce greenhouse gas emissions?</p> <p>How should WTD prepare and adapt to climate impacts (<u>e.g., precipitation/storm intensities, sea level rise, river flooding, etc.</u>) in line with the Strategic Climate Action Plan? What level of climate impact risk tolerance should WTD plan for <u>to avoid or minimize risks to the system</u>?</p>
<p>Resource Recovery</p> <p>Recycled water, biosolids, energy capture</p>	<p>Energy production and heat recovery – Should WTD be expanding its efforts to capture energy and heat? If so, at what level of effort?</p> <p>Biosolids – Should WTD further expand its efforts to develop Class A biosolids? What changes are needed to biosolid recovery policies <u>and processes! to get to Class A? Should WTD provide additional treatment to biosolids beyond the required level to address concerns about PFAS, CECs or other pollutants and ensure product acceptance?</u></p> <p>Recycled water – Under what circumstances should the region expand the use of reclaimed water? Which uses (e.g., environmental benefits, groundwater recharge, industrial uses, irrigation) are most appropriate?</p> <p><u>How can WTD best support environmental benefits while instituting safeguards to protect against environmental risks of contamination? How should cost considerations be weighed?</u></p>
<p>Finance / Affordability</p> <p><u>Cost structure and Rate equity, rate structure,</u> capital financing and debt management, financial planning and revenue sufficiency</p>	<p>Is there a better rate structure for the sewer rate? (Note: WTD has identified a work plan to further evaluate the residential customer equivalent conversion factor of 750 cubic feet per month.)</p> <p>Will WTD maintain a single uniform sewer rate per <u>residential customer equivalent RCE</u> (Robinswood “one for all, all for one”), or consider alternative cost recovery rate structures to reflect other system impacts?</p> <p>Should WTD update the rate structure for the capacity charge to align with current industry standards? (Note: †The capacity charge rate structure was updated in 2021. A capacity charge methodology study is in progress.)</p> <p>What other rate relief approaches should WTD implement to improve affordability for those who may struggle to pay their sewer bill?</p>

Challenges and Opportunities – Topics/Themes	Major Policy Questions to be Analyzed in RWSP Update
<u>Relationship to Contracts</u>	<u>Are major policy updates aligned with component agency contracts?</u> <u>How will WTD implement the RWSP Update consistent with direction and requirements expected of contract agencies?</u>

DRAFT

Regional Wastewater Services Plan (RWSP) Update Scoping Document Comments

RWQC = Regional Water Quality Committee

MWPAAC = Metropolitan Water Pollution Abatement Advisory Committee

SCA = Sound Cities Association

Comment #	Commenter Organization	Source of comment	Page No.	Policy Category (if applicable)	Comment	WTD Response
1	MWPAAC, SCA	8/28 MWPAAC general meeting - staff notes; 9/5/24 MWPAAC subcommittee meeting notes; 9/16/24 SCA Caucus feedback transmitted by email			<p>How will MWPAAC be involved? How can MWPAAC members participate and contribute in this process, not necessarily as decision makers, but members that support and participate in the process?</p> <p>There is a desire to have additional involvement outside of current established process for review with WTD. Is there a space where some members could be more involved in the process outside of and in addition to the normal MWPAAC or RWQC committee meetings?</p> <p>As part of the technical analysis, collaboration between MWPAAC and RWQC should be mentioned. RWQC does not need in the weeds technical analysis updates, but more broad policy implications to their constituents.</p>	WTD is working to elevate the level of coordination between MWPAAC and RWQC member staff to create an authentic process for engagement and collaboration. In partnership with MWPAAC, WTD is creating a RWSP Working Group so MWPAAC and RWQC staff can regularly and consistently provide input into, and help shape the outcome of, WTD work products related to the RWSP update. This Working Group is planned to meet on the 2nd Wednesday of the month; WTD is working with MWPAAC leadership and RWQC staff on Working Group membership. The intention with this Working Group is to create a more informal setting, outside of the formal RWQC meetings and MWPAAC general meetings, for collaboration amongst staff.
2	MWPAAC	8/28 MWPAAC general meeting - staff notes			Some contracts expire in 2036. What is timing of restarting contract negotiations?	Some analytical work to support contract negotiations will occur as part of the RWSP Update planning process, and the scoping document has been revised to reflect this.
3	MWPAAC	8/28 MWPAAC general meeting - staff notes			Want documents more than the day before - as early as possible	Comment noted. WTD will strive to send documents at least 1 week in advance.
4	MWPAAC	8/28 MWPAAC general meeting - staff notes			In future, when material is sent, please send how WTD wants feedback and timeframe for comments.	Comment noted. WTD will include this information in the future.
5	MWPAAC, RWQC, SCA	8/28 MWPAAC general meeting - staff notes; 9/4/24 RWQC Meeting - staff notes; 9/16/24 SCA Caucus feedback transmitted by email	2		<p>On Figure 1, why is visioning in the middle of the process? Why isn't visioning first? Why not sequential? Vision would be most helpful if established earlier. This is an opportunity to build regional consensus and buy-in to how service costs are distributed.</p> <p>Need to start with the mission and vision first and identify constraints/restraints.</p> <p>Our central question is where are we going? And how much will it cost? Putting vision sooner in the process will also lead to better stakeholder engagement.</p> <p>MWPAAC and RWQC have concerns around the vision effort running concurrent with the policy analysis.</p> <p>Where does decision making fit - like for risk and level of service?</p>	The visioning process is starting this year, the earliest WTD can do it, and will run from 2024-2025. A sequential process would extend the overall schedule by at least a year, and we understand there is a strong desire to complete the RWSP Update as soon as reasonably possible. The vision will be identified prior to decision-making on a recommended strategy/alternative and recommended policies.
6	MWPAAC	8/28 MWPAAC general meeting - staff notes	2		Where does decision making fit - like for risk and level of service?	There are lots of different types of decisions that will need to be made. WTD will propose how we work with MWPAAC and the touchpoints along the way to integrate their thoughts.

Comment #	Commenter Organization	Source of comment	Page No.	Policy Category (if applicable)	Comment	WTD Response
7	MWPAAC	8/28 MWPAAC general meeting - staff notes	2		Vision would/should inform how policy issues are prioritized.	Comment noted. WTD agrees that the vision should inform how policy issues are prioritized.
8	MWPAAC	8/28 MWPAAC general meeting - staff notes	2		Do we need more time to conduct technical analyses needed to make decisions. Where is the technical work? Make sure there is enough time to do work needed.	Comment noted. WTD will be developing a detailed schedule to ensure there is enough time to do the work needed.
9	MWPAAC	8/28 MWPAAC general meeting - staff notes	4		Some concern about three alternatives. Will want to mix and match. Pioneering utility looks scary since so expensive. What about best practice as an option?	Comment noted. WTD agrees that mixing and matching might be desired, but that it is best done after the three alternatives are developed, as we decide on a recommended alternative. WTD will incorporate best practices in the three alternatives as appropriate.
10	MWPAAC	8/28 MWPAAC general meeting - staff notes	4		Pioneering utility might seem kind of out there, but being future-focused is very important so we are not caught off-guard. Committee member worked at prior utility that invested in nutrient reduction when there was an opportunity, and that utility is now ahead of the game. Important to look at these opportunities as we go through this process.	Comment noted. WTD will identify opportunities as we develop the strategy alternatives.
11	MWPAAC	8/28 MWPAAC general meeting - staff notes	7		Suggest a new policy topic/category - relationship to contracts	WTD has revised the scoping document to add Relationship to Contracts as a new policy topic/category.
12	MWPAAC, SCA	8/28 MWPAAC general meeting - staff notes; 9/16/24 SCA Caucus feedback transmitted by email	7		Is list of major policy issues in priority order? If yes, finance/affordability should be at the top and not at the end. Same with capacity. What about things not on list - cost, infrastructure, water quality - can we add? Capacity should be listed first in the table, and addressed first. Understanding system capacity and future capacity needs is foundational to being able to thoughtfully weigh policy choices in all areas.	Comment noted. The list of major policy issues is not in priority order. WTD appreciates the input that finance/affordability and capacity are priorities. Cost, infrastructure, and water quality will be considered during the RWSP Update planning process.
13	MWPAAC	8/28 MWPAAC general meeting - staff notes	7	Equity and Social Justice	Hope equity and social justice can be expanded to include equity among contract agencies since not all are treated the same. All for one and one for all - let's make sure everyone is receiving a similar level of service from the regional system. Cascade Water Alliance is implementing equity among their members. Good model for WTD to look at.	Comment noted. This comment touches multiple topics – the distinction between racial equity and equity in industry rate making, the "one for all and all for one" related to the uniform sewer rate per residential customer equivalent (RCE), and the contract basis for regional facilities 1000 acre basin and 20 year policy. Each of these will be addressed in other questions or as part of the RWSP Update planning process. Of note, as stated in the scoping document, WTD will be "Studying peer utility agency financial policy structures and evaluating them within a WTD specific context". Cascade Water Alliance can be included in this peer list.
14	MWPAAC	8/28 MWPAAC general meeting - staff notes; 9/4/24 RWQC Meeting packet; 9/5/24 MWPAAC subcommittee meeting notes	7		Some of the major policy issues/questions are technical and not policy. (As an example, the third question about increasing facility capacity or a decentralized approach could be pulled up to a policy level that commits to using a detailed business case analysis.)	WTD will review the questions for wording changes so they are all framed as policy questions.

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15	MWPAAC	8/28 MWPAAC general meeting - staff notes	7	Capacity Demands	Capacity for growth question contains a lot - need to break out more to understand.	Comment noted. WTD will be proposing a work plan with MWPAAC and can break out the capacity for growth question as we develop the work plan.
16	MWPAAC	8/28 MWPAAC general meeting - staff notes	7	Infrastructure resiliency	Risk tolerance is a key policy question - very nuanced and varies across system	Comment noted. Risk tolerance will be considered during the RWSP Update planning process.
17	MWPAAC	8/28 MWPAAC general meeting - staff notes	7	Infrastructure resiliency	For asset management, need to consider level of service. What is definition and expectation? Can help drive investment. Need to spend time figuring out the level of service. Level of service expectation is a policy decision	Comment noted. Level of service will be considered during the RWSP Update planning process.
18	MWPAAC	9/4/24 RWQC Meeting packet			The top five questions are as follows: 1) Will WTD maintain a single uniform sewer rate per RCE or consider alternative cost recovery rate structures to reflect other system impacts; 2) How should I/I be managed; Should I/I policy change to reduce the capacity needed for I/I; 3) Under what circumstances should the region expand the use of reclaimed water; Which uses are most appropriate; 4) What level of risk tolerance should WTD accept; 5) What upstream or source control actions should the region undertake?	Comment noted. WTD appreciates this input on priorities.
19	RWQC	9/4/24 RWQC Meeting - staff notes			Need for a project charter to serve as a framework	Comment noted. WTD is working with MWPAAC and RWQC member staff to develop a Charter to serve as a framework for collaboration, partnership, and process between WTD, MWPAAC, and RWQC to update the RWSP. This is not a project charter for the RWSP itself; rather it is a plan and commitment from WTD, RWQC, and MWPAAC to collaborate and effectively engage one another so WTD can produce an update to the RWSP that has been influenced by input from RWQC and MWPAAC for decision and adoption by the King County Executive and Council.
20	RWQC, SCA	9/4/24 RWQC Meeting - staff notes; 9/16/24 SCA Caucus feedback	7	Equity and Social Justice	Need more clarity and definition on equity and affordability - is it a social issue or a financial issue? Is fairness a better definition? Define equity, affordability (for the middle class and not just low-income), and the concept of rate fairness between rate classes.	WTD has added definitions to the scoping document and will make an effort to distinguish between the County principle of "Equity and Social Justice" and the utility industry use of "Equity" in the context of fair cost treatment / proportionate share. Affordability can be considered a social issue, but it is impacted by financial decisions in rate-making and assistance programs.
21	RWQC	9/4/24 RWQC Meeting - staff notes			Any vision of what the future system looks like will come at a cost. We need to have a balance. The balance between vision and cost is something that will have to be an iterative process.	Comment noted. The balance between vision and cost will be considered during the RWSP Update planning process.
22	RWQC	9/4/24 RWQC Meeting - staff notes	7	Equity and Social Justice	The concept of rate fairness, including between different classes of rate payers, might be a more specific way to distinguish equity. This concept needs to be mentioned.	Comment noted. Fair/equitable/proportionate allocation of costs to customer classes will be a concept discussed during the RWSP Update planning process.
23	RWQC, MWPAAC, SCA	9/4/24 RWQC Meeting - staff notes; 9/5/24 MWPAAC subcommittee meeting notes; 9/16/24 SCA Caucus feedback transmitted by email	7	Capacity Demands	How does infiltration/inflow (I/I) appear in this? Cities are paying for stormwater, but stormwater isn't mentioned in this list. Stormwater directly impacts wastewater via I/I and this needs to be clear. Consider adding a section in the RWSP that acknowledges stormwater's environmental impacts while clarifying that this plan would not adopt policy or projects on stormwater. Will need to grapple with the challenges around I/I and CSOs. The intent is not to take on stormwater projects in the RWSP Update, but about where to draw the line.	Comment noted. Major policy questions related to I/I are included under the Capacity Demand topic. WTD agrees that stormwater impacts the system via I/I. This is recognized on page 7 of the scoping document where it states that the RWSP Update does not include stormwater planning but will include how to address stormwater entering the wastewater system, such as through I/I.

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24	RWQC, SCA	9/4/24 RWQC Meeting - staff notes, 9/16/24 SCA Caucus feedback transmitted by email	7	Regulatory Landscape	Should we look at water quality more holistically? How do we most effectively spend the dollars? Regulations deal with wastewater and stormwater separately, but Puget Sound doesn't care about this difference. We are going to have to grapple with this while remembering that this is where the Clean Water Plan floundered. Add water quality and define the parameters as previously discussed in RWQC and MWPAAC, i.e., the RWSP is about wastewater but it should be done with an understanding of its relationship to stormwater efforts. Stormwater is also to be addressed directly in the RWSP with respect to I/I.	Comment noted. The RWSP Update will focus on wastewater but will include how to address stormwater entering the wastewater system, such as through I/I. WTD has legal obligations to address wastewater impacts to Puget Sound, and the actions taken to meet legal obligations should be complementary to stormwater actions.
25	RWQC	9/4/24 RWQC Meeting - staff notes	7	Regulatory Landscape	Consider adding a new policy area for the environmental impact of wastewater and possibly in context, acknowledge the contribution of stormwater to environmental impact without proposing policies/programs for stormwater.	Comment noted. On page 7 of the scoping document, it states that the RWSP Update does not include stormwater planning but will include how to address stormwater entering the wastewater system, such as through I/I. WTD has legal obligations to address wastewater impacts to Puget Sound, and the actions taken to meet legal obligations should be complementary to stormwater actions.
26	RWQC	9/4/24 RWQC Meeting - staff notes	7	Climate Change	Under climate change, there is no mention of storm intensities which has a big impact on I/I.	WTD has revised the scoping document to add examples of climate change impacts, such as storm intensities, to Climate Change question 3.
27	RWQC	9/4/24 RWQC Meeting - staff notes			Who decides on the vision? Need to understand roles and decision-making process.	Comment noted. WTD will conduct broad engagement on vision options in 2025, and a vision will be announced in the Fall 2025. The vision will be adopted by King County Council as part of the RWSP Update.
28	RWQC	9/4/24 RWQC Meeting - staff notes			What's the difference between Vision for clean water versus vision for regional wastewater system?	Comment noted. The terms are used interchangeably. WTD will strive for consistency in terminology.
29	RWQC	9/4/24 RWQC Meeting - staff notes	7	Capacity Demands	A big thing is capacity demand and the need to take care of customers/neighbors and expansion, the ability to deliver.	Comment noted. WTD will use the best available information to forecast capacity needs as part of the RWSP Update planning process so that we can continue to provide wastewater services to our customers.
30	RWQC	9/4/24 RWQC Meeting - staff notes	7	Infrastructure resiliency	Infrastructure resiliency and taking care of maintenance is also important.	Comment noted. Infrastructure resiliency and taking care of maintenance will be considered during the RWSP Update planning process.
31	RWQC	9/4/24 RWQC Meeting - staff notes	8	Finance / Affordability	Affordability might be a stand alone item.	Comment noted. Affordability will be a stand-alone policy question but it is currently grouped with other financial questions as part of a larger topic/theme.
32	RWQC	9/4/24 RWQC Meeting - staff notes	7	Regulatory Landscape	Should we be thinking about inland waters (e.g., lakes, streams, etc.) and not just Puget Sound? Should we be looking at Salish Sea instead of Puget Sound?	Comment noted. Inland waters, as well as Puget Sound, will be considered, as appropriate, during the RWSP Update planning process.
33	RWQC	9/4/24 RWQC Meeting - staff notes			What level of detail are we talking about in this discussion? If we're starting at a high level and working toward detail that will be embedded in code, what is the process to get there?	Comment noted. WTD will be developing a detailed schedule that describes the process.
34	RWQC	9/4/24 RWQC Meeting - staff notes	7	Climate Change	Protection - What are we doing for protection around climate change? To protect Puget Sound? To protect our assets?	WTD has revised the scoping document to add the phrase "to avoid or minimize risks," consistent with language used in the County's Strategic Climate Action Plan, to address the idea of protection.
35	RWQC	9/4/24 RWQC Meeting - staff notes	7	Equity and Social Justice	Equity - Consider thinking about this as economic mobility. What vendors are we using? Are they people of color? Are the investments we are making going back into the community we are impacting?	Comment noted. This is in line with the County's Equity and Social Justice lens.

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36	RWQC	9/4/24 RWQC Meeting - staff notes	8	Finance / Affordability	Affordability - The middle class is also struggling. We focus a lot on low-income, but what about people that don't meet that threshold that can't afford things? Fixed income is a challenge.	Comment noted. The affordability definition will help inform who the affordability test incorporates. Affordability analysis will include at least two different lenses: •As a tool to compare the rate impacts of different RWSP strategies to assess relative impact to any household. •Relief approaches for low income households who are most likely to struggle to pay essential living expenses.
37	RWQC	9/4/24 RWQC Meeting - staff notes	8	Finance / Affordability	Question about regional buy-in on the costs to the system. The Robinswood agreement was in part a regional acceptance of a certain balance of service and costs. It's been a long time since that agreement. This is an opportunity to build a current regional consensus about who benefits and who pays. We should go back and review the Robinswood agreement and policies. What was in it? Should it change and if so, how?	Comment noted. WTD will develop materials that describe the history and context around the regional wastewater system, Robinswood Agreement, key assumptions, and past decisions.
38	RWQC	9/4/24 RWQC Meeting - staff notes	4		Capital strategies - Stay the course, strategic enhancement, pioneering utility - This is the crux. How does this fit with our mission and vision?	Comment noted. WTD will consider mission and vision when developing the strategies.
39	RWQC	9/4/24 RWQC Meeting - staff notes	8	Finance / Affordability	We know we have an affordability problem already as we see rates likely doubling/tripling. How can we afford anything beyond requirements? Maybe start with the minimum/basics and then see how much can be layered on top of it.	Comment noted. All the potential strategies will be presented with their associated costs and rate/affordability impacts.
40	RWQC, SCA	9/4/24 RWQC Meeting - staff notes; 9/16/24 SCA Caucus feedback transmitted by email			We need to understand historical data, volume, rates, and affordability. Need to agree on past facts in order to move forward and build consensus. Need to understand why things were built the way they were. Provide historical context as part of the update, so cities and other contract agencies can understand how past decisions led to the system we have today. Include the history of the regional wastewater system, Robinswood Agreement, key assumptions, and how past decisions led to the system we have today to inform how we regionally move forward. The "system status" was missing from the scope.	Comment noted. WTD will develop materials that describe the history and context around the regional wastewater system, Robinswood Agreement, key assumptions, and past decisions. "System status" will be considered during the RWSP Update planning process. WTD will review the Existing Conditions report produced by the Clean Water Plan to determine if it needs to be refreshed.
41	Sewer Districts	9/5/24 Sewer District Policy Paper transmitted by email	8	Finance / Affordability	There should be consideration for contracting agencies to be billed on a total flow basis to reflect actual demands placed upon the conveyance and treatment systems. This would address any inaccuracies in the RCE and better reflect a true cost of service. This would create direct financial incentives for local agencies to reduce I/I.	Comment noted. WTD will review past materials that looked at flow-based billing.
42	Sewer Districts	9/5/24 Sewer District Policy Paper transmitted by email	8	Finance / Affordability	If the RCE is to be used in the future as the basis for customer charges, the RCE should be periodically recalibrated to reflect actual flows.	Comment noted. Policy related to updating the RCE is planned to include flexibility for timely update.
43	Sewer Districts	9/5/24 Sewer District Policy Paper transmitted by email	8	Finance / Affordability	If the RCE is to be used in the future as the basis for customer charges, there should be I/I standards for contract agency owned systems and disincentives for exceeding standards. There should also be an equivalent disincentive for combined sewer flows.	Comment noted. One of the Finance / Affordability policy questions in the scoping document asks: "Will WTD maintain a single uniform sewer rate per RCE (Robinswood "one for all, all for one"), or consider alternative cost recovery rate structures to reflect other system impacts?"

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44	Sewer Districts	9/5/24 Sewer District Policy Paper transmitted by email			There should be clear policy guidance on defining the scope and limits of wastewater program responsibilities that result in costs to contract agencies.	Comment noted.
45	Sewer Districts	9/5/24 Sewer District Policy Paper transmitted by email	7	Equity and Social Justice	There should be clearer policy guidance as to how Equity and Social Justice objectives apply directly to wastewater functions and how they are prioritized with respect to traditional utility decision making processes.	Comment noted. WTD will embed the principles of equity and social justice as outlined in the King County Equity and Social Justice Strategic Plan as an element of the RWSP Update.
46	Sewer Districts	9/5/24 Sewer District Policy Paper transmitted by email	8	Finance / Affordability	There should be clearer policy guidance as to the objectives of affordability initiatives - a) reducing the total overall current and future costs of the wastewater system that apply to all customers; b) reducing costs of housing for certain customers; c) reducing wastewater charges for certain customers; d) reducing rates in the near term; e) other	Comment noted. The affordability definition will help inform who the affordability test incorporates. Affordability analysis will include at least two different lenses: •As a tool to compare the rate impacts of different RWSP strategies to assess relative impact to any household. •Relief approaches for low income households who are most likely to struggle to pay
47	Sewer Districts	9/5/24 Sewer District Policy Paper transmitted by email			Policy should be developed to ensure that the County will implement its plans and programs consistent with direction and requirements expected of contract agencies.	WTD has revised the scoping document to include a new major policy question "How will WTD implement the RWSP Update consistent with direction and requirements expected of contract agencies?"
48	Sewer Districts	9/5/24 Sewer District Policy Paper transmitted by email			The County should commit to developing and updating a system-wide plan that is coordinated with contract agencies that would identify the anticipated location and timing of future regional facilities. In addition, the County should develop design standards for such facilities that contract agencies would use in construction. The County should commit to accepting such regional facilities when established criteria are met.	Comment noted. The RWSP and the associated Conveyance System Improvement Plan are the plans that identify the anticipated location and timing of future regional facilities. WTD is working to elevate the level of coordination between MWPAAC and RWQC member staff to create a process for engagement and collaboration on the update to the RWSP. King County Code 28.86.060 CP-5 is the policy that describes acceptance of regional facilities, and this policy will be reviewed during the RWSP Update planning process.
49	Sewer Districts	9/5/24 Sewer District Policy Paper transmitted by email	7	Equity and Social Justice	Levels of service should be established for local connections to the regional system such that all contract agencies are treated equitably.	Comment noted. Levels of service will be considered during the RWSP Update planning process.
50	Sewer Districts	9/5/24 Sewer District Policy Paper transmitted by email	8	Resource Recovery	The County should coordinate reclaimed water planning with local drinking water system plans.	Comment noted. Local drinking water system plans will be considered during the RWSP Update planning process.
51	Sewer Districts	9/5/24 Sewer District Policy Paper transmitted by email	8	Resource Recovery	Local drinking water utilities should not be economically impacted by the delivery of reclaimed water within their service area.	Comment noted. Delivery of reclaimed water and its economic impact on local drinking water utilities will be considered during the RWSP Update planning process.
52	Sewer Districts	9/5/24 Sewer District Policy Paper transmitted by email	8	Resource Recovery	The County should be responsible for costs to mitigate contamination to drinking water supplies from contaminants in reclaimed water.	WTD has added a new question under the Resource Recovery policy category that reads as follows: "How can WTD best support environmental benefits while instituting safeguards to protect against environmental risks of contamination? How should cost considerations be weighed?"

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53	Sewer Districts	9/5/24 Sewer District Policy Paper transmitted by email	8	Resource Recovery	The County should plan to provide opportunities for all contracting agencies to access reclaimed water.	Comment noted. Access to reclaimed water will be considered during the RWSP Update planning process.
54	Sewer Districts	9/5/24 Sewer District Policy Paper transmitted by email	7	Infrastructure resiliency	The County should evaluate, prioritize and program facilities and pipelines based upon the likelihood and consequences of failure from a seismic event, and consider options to expedite service restoration.	Comment noted. Prioritization based on the likelihood and consequences of failure will be considered during the RWSP Update planning process.
55	Sewer Districts	9/5/24 Sewer District Policy Paper transmitted by email	7	Infrastructure resiliency	The county, in coordination with contract agencies, should develop a service restoration plan in the event of service disruptions from a seismic event. A service restoration plan should not significantly disadvantage any community.	Comment noted. WTD has a 2018 Comprehensive Resiliency and Recovery Plan, addressing resiliency and recovery from natural disasters. King County Office of Emergency Management also has programs, such as the Regional Framework for Response to Natural Disasters, which outlines our partnership with numerous entities to provide "mutual aid" to various entities.
56	Sewer Districts	9/5/24 Sewer District Policy Paper transmitted by email	8	Finance / Affordability	The connection charge program should capture all elements of growth, not just those that are easily identified and capture those units of growth that may not include a new connection to the sewer system. Individual connection charges should not include costs associated with those units of growth that are not being assessed.	Comment noted. The capacity charge is assessed not only to new connections but also redevelopment with increased capacity needs. Also, one of the policy questions in the scoping document explicitly refers to the capacity charge: "Should WTD update the rate structure for the capacity charge to align with current industry standards?"
57	Sewer Districts	9/5/24 Sewer District Policy Paper transmitted by email	8	Finance / Affordability	The County and contracting agencies should evaluate the option of passing connection charges on to contracting agencies instead of to individuals.	Comment noted.
58	Sewer Districts	9/5/24 Sewer District Policy Paper transmitted by email	7	Infrastructure resiliency	A long term asset management plan should be implemented that recognizes the investment that will be necessary to sustain the wastewater system into the future. This level of investment will be included in fiscal modeling and rate forecasting.	Comment noted. Long term asset management planning is in development, and condition assessment contract work has kicked off. Asset management is and will continue to be a key component of fiscal modeling and rate forecasting.
59	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	7	Regulatory Landscape	Looking to the future, considering different technologies could result in more distributed treatment and potentially discharging into inland waters in addition to Puget Sound. This also ties into reclaimed water, emerging contaminants and PFAS.	Comment noted. WTD will consider all the impacts of different technologies including distributed treatment, different discharge locations, and ties to reclaimed water during the RWSP Update planning process.
60	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	7	Regulatory Landscape	Recommend a forward-looking policy for WTD to work with regulators to steer future regulations, advocating for greater awareness around how stormwater and wastewater regulations are connected.	Comment noted. WTD has engaged and will continue to engage with Ecology on future regulations.
61	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	7	Regulatory Landscape	Reactive vs. proactive - It is important to include all of the considerations including funding and resources so the full picture is clear on the implications of a reactive vs. proactive approach.	Comment noted. WTD will perform a comprehensive analysis to ensure important factors are considered during decision-making.
62	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	7	Capacity Demands	Should capacity be looked at first in the actual review order because the overarching focus is providing wastewater service, and capacity gets at how much service needs to be provided, with capital investment as the main driver that should become the base for all the other areas.	Comment noted. The major policy questions are not ordered by priority. WTD appreciates the feedback that capacity demand is a main driver.

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63	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	7	Capacity Demands	It would be good to have a baseline if King County is currently meeting the capacity needs of the agencies it contracts with, relating specifically to ownership and extension of regional facilities that meet the County standards. It would be beneficial to have a deep dive gap analysis of existing conditions.	Comment noted. WTD will review the Existing Conditions report produced by the Clean Water Plan to determine if it needs to be refreshed. Capacity needs and extension of regional facilities will be considered during the RWSP Update planning process.
64	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	7	Capacity Demands	We know I/I impacts capacity. We should consider the question of if it's worthwhile as a region to be more proactive in eliminating I/I and stormwater from our system regionally to avoid building new facilities sooner than later, or do we deal with it by building another treatment plant.	Comment noted. I/I will be considered during the RWSP Update planning process.
65	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	7	Capacity Demands	What steps have Seattle and King County taken to retrofit their systems to reduce CSO impacts through separated system investments? Are there any policies that address that?	Comment noted. WTD has evaluated separation in its Long-Term Control Plan activities, as documented in the 2018 CSO Program Update. King County Code 28.86.080 CSOCP-4 states that if new projects are built that would separate stormwater from the combined system, the County will work with Seattle on the MS4 process as appropriate. CSOCP-5 states that County wastewater treatment and conveyance systems shall not be designed to intercept, collect, and treat new sources of stormwater; however, County may evaluate benefits/impacts to system from accepting stormwater from Seattle under
66	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	7	Infrastructure resiliency	It would be good to tie the work of the recent motion responses for long range forecasting into this section, and have policies around the use of or dedication to maintaining and continued investment in the maturity of the long range forecasting tools and methods.	Comment noted. Final reports and recommendations from the motions will be included in future discussion materials for major policy questions on these topics.
67	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	7	Infrastructure resiliency	When we get to the risk policy area, there should be good definition around types of risk, for instance is this addressing financial risk, environmental risk, system risk, enterprise risk, etc. and pull the language up to the policy level but ensure enough clarity is there to make it meaningful.	Comment noted. Definition around risk types will be considered during the RWSP Update planning process.
68	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	7	Infrastructure resiliency	The risk issue is a deep topic. To have the most meaningful conversations at the RWQC level, we need to be clear about what the risks are here. That's too far in the weeds here, but we should be prepared with information on those types of risk and what there is to consider.	Comment noted. Risk will be considered during the RWSP Update planning process.
69	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	7	Infrastructure resiliency	Recommend coming up a level from the questions currently listed. Asset Management decisions are dynamic, a policy should be at a level such as requiring the use of a strategic asset management plan (SAMP), defining the key areas of focus for the SAMP, and coming to an update frequency for the SAMP.	Comment noted. WTD will work to ensure that policies are written at the appropriate level.
70	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	7	Infrastructure resiliency	There are two different areas in this category, the risk topic and the renewal/replacement topic. Having the renewal/replacement considerations in this category could lose the interconnectivity to the other categories that need to be balanced together in creating a capital plan. Maybe separate it out or highlight it to be reviewed with the other categories. It would be good to see in the scope a scheduled task and time dedicated to review the policies across categories to ensure the interconnectivity is considered and it is ensured that the policies complement and don't hinder each other, as well as having the cross over between policy areas documented and memorialized somewhere.	Comment noted. Interconnectivity among policies will be considered during the RWSP Update planning process.

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71	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	7	Infrastructure resiliency	The issue of balancing investments in existing infrastructure and what is needed to provide for the future is a common issue across most agencies. It's important to look across all investment categories and the rate considerations to create the most effective portfolio.	Comment noted.
72	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	7	Infrastructure resiliency	WTD has been pursuing an asset management program for a long time. It would be beneficial to have clarity on the ask. Is the ask "Should we do something different?" If not, and the asset management program is achieving what is needed, then is this a necessary policy issue for now?	Comment noted. The ask is about whether WTD should do something different regarding asset management. Options will be developed as part of the three strategies - stay the course, strategic enhancement, pioneering utility.
73	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	7	Infrastructure resiliency	There is a link between resiliency and natural hazards and the other category related to climate change and I/I. As you bring these together, are you designing these systems for future precipitation situations, or are you designing them for the last 40 years of precipitation information? That is a policy decision and could go in all three of these categories.	Comment noted. Future increased precipitation due to climate change will be considered during the RWSP Update planning process.
74	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	7	Equity and Social Justice	Interagency equity should be considered as part of this. We should consider if all agencies have the same level of service and access to regional facilities, agencies should not be put at a geographic disadvantage. Recommend the definition of equity be drafted with that element included.	Comment noted. Level of service will be considered during the RWSP Update planning process.
75	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	7	Equity and Social Justice	There are many types of equity - intergenerational equity, regional equity, social equity, and environmental justice equity. All of these are very different considerations. In drafting the definition recognizing the varieties of equity and social justice that are out there, this should be thought through as part of the analysis and maybe defined separately.	Comment noted. WTD will make an effort to distinguish between the County principle of "Equity and Social Justice" and other types of equity. .
76	MWPAAC, SCA	9/5/24 MWPAAC subcommittee meeting notes; 9/16/24 SCA Caucus feedback transmitted by email	7	Climate Change	MWPAAC: The first question (What climate experts and data should WTD use to inform planning?) seems to be a technical question, an operational decision, and not a policy level question. SCA: Suggested edit to question 1 - What climate experts and data, and assumptions should WTD use to inform planning? Should these efforts be coordinated with contract agency side systems?	WTD has revised the first question in the Climate Change policy category as follows: Should existing wastewater policy language (KCC 28.86) be revised to specifically call out planning for future climate conditions in addition to population growth and other environmental factors? Note that the source and availability of data relates to when WTD can answer questions (e.g., we use PSRC population data and therefore will not incorporate climate migration into our capacity planning until PSRC incorporates it into their population planning.
77	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	7	Climate Change	The second question around energy use and greenhouse gas emission reduction, could possibly be better phrased to "Should WTD be doing these thing" and not "How". Again, the how seems more on the technical side and requires analysis of options. At the policy level, we should stay at the "what should we do" and possibly "how much should we do it," but it seems the how is later in the process.	WTD has revised the second question in the Climate Change policy category as follows: How much should WTD reduce energy use and reduce greenhouse gas emissions?

Comment #	Commenter Organization	Source of comment	Page No.	Policy Category (if applicable)	Comment	WTD Response
78	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	8	Resource Recovery	Recycled water has been coming up as a more frequent topic. There was a motion around 2011 regarding reclaimed water. I believe the motion was around what we should do about reclaimed water, where we should do it, and to develop policies around how its paid for and by whom. I don't know the status of those policies or if they were ever finalized. It will be important to revisit what the policies were, and RWQC will need to see those policies to make decisions on this topic.	Comment noted. WTD will research the motion and previous policy work and incorporate the information into the RWSP Update planning process as appropriate.
79	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	8	Resource Recovery	There are a lot of different angles here. Some agencies have a specific interest in this particularly around the financial stuff that has been mentioned. I would love to see more recognition around the financial implications and associated impacted agencies, such as Cascade Water Alliance. There is an environmental benefit as well as an environmental risk around the use of recycled water, so we need to have enough context and capture the need for protection.	Comment noted. Financial implications of alternatives under consideration will be included in the RWSP Update planning process.
80	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	8	Resource Recovery	Similar to the stormwater discussion earlier, this might be another area that policy is needed to capture where the line is between water planning and wastewater planning. They need to be complementary, but they are not the same. Policy should define those areas.	WTD has revised the scoping document to state that "Similarly, the update to the RWSP will not include water supply planning but will include recycled water which is a nexus between wastewater and water."
81	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	8	Resource Recovery	Echo the previous comments on considering the environmental risks, as well as note there seems to be an assumption of expansion, and I would like to see a leaning toward evaluation in general. In some cases, we should consider a baseline of should we do this at all.	Comment noted. Environmental risk will be considered during the RWSP Update planning process.
82	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	8	Finance / Affordability	Can WTD provide clarity around the rate relief question since WTD does not have retail customers? Rate relief programs are managed at the local agency level. It would be good to have a better understanding of the context of the policy question.	Comment noted. WTD is engaged in understanding the Customer Assistance Programs offered by the contract agencies as important context to the affordability policy work and has plans to act in an advocacy role for federal, state, and local assistance for rate relief in WTD's service area.
83	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	8	Finance / Affordability	We have talked a lot at MWPAAC around the balance between cash funding vs. debt in the CIP. That isn't explicitly called out, and there isn't a question referencing how we are going to balance the large CIP that will come out as part of this plan.	Comment noted. Yes, this will be part of the discussion. Although it's not one of the policy questions listed in the document, it's explicitly referenced under the subthemes as "capital financing and debt management".
84	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	8	Finance / Affordability	Following the previous comment, not only cash flow but previous affordability discussions have included things like grant seeking and federal support. That is not explicitly defined here.	Comment noted. Grant seeking and federal support can be added to the discussion.
85	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	8	Finance / Affordability	When we talk about rate structure and affordability, one of the things talked about at SCA is using the term "affordability and rate fairness." The idea is not only considering affordability at large but also the difference between the rate classes and jurisdictions.	Comment noted. Affordability and rate fairness are two separate though related concepts.
86	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes			Is there a place for a defined update frequency for the RWSP?	Comment noted. KCC 28.86.165 includes reporting and review policies for the RWSP, and these policies will be evaluated during the RWSP Update planning process to see if any changes are recommended.
87	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes			It would be good to see what the vision was in 1999? Does that serve history serve as an orientation? Are there elements that should be common and shared?	Comment noted. The 1999 RWSP did not have a formal vision.

Comment #	Commenter Organization	Source of comment	Page No.	Policy Category (if applicable)	Comment	WTD Response
88	SCA	9/16/24 SCA Caucus feedback transmitted by email			Because many of the areas impact each other, the process needs to start with a firm grounding in all major elements of the RWSP and how they are interrelated, particularly concerning rate affordability and rate fairness. There also needs to be space made to discuss the interrelationship of policy choices as each chapter moves forward.	Comment noted. WTD will provide grounding information and create a space for policy discussions on interrelated concepts during the RWSP Update planning process.
89	SCA	9/16/24 SCA Caucus feedback transmitted by email			Identify the current capacity in the system, what future capacity will be, and what we need to replace. Start with these basics then layer additional policy options on top of that to keep rates affordable.	Comment noted. Capacity and replacement needs will be considered during the RWSP Update planning process.
90	SCA	9/16/24 SCA Caucus feedback transmitted by email			Better define stakeholder engagement. Clarify who gets to decide the vision and what is the role of MWPAAC, RWQC, and individual Councils. Likewise, as a regional organization that represents cities across King County, SCA should be considered a partner in this work. Keep in mind outreach and engagement of SCA PIC members to gather feedback on the initial vision concepts and the accompanying challenges and opportunities document.	Comment noted. WTD is transitioning from a Guiding Principles document to a Charter for the RWSP update. This Charter will articulate roles and responsibilities, specifics around process and schedule, as well as important guiding principles. We consider SCA a partner in this work as it is a member of RWQC, and we are including SCA staff in the RWSP Working Group mentioned in the response to Comment #1, and are encouraging SCA staff to attend MWPAAC meetings as well. We have been in communication with SCA staff to provide updates to PIC members when appropriate.
91	SCA	9/16/24 SCA Caucus feedback transmitted by email	7	Regulatory Landscape	SCA agrees with MWPAAC that this language can be clarified to sit more squarely within the policy and not technical realm. See suggested edit to question 2 - What assumptions should be made about how the County will anticipate, engage with, and address future nutrient permit requirements, regulations related to CECs such as PFAS, or other future regulatory changes?	WTD has revised the second question under the Regulatory Landscape category to read as follows: What assumptions should be made about how the County will anticipate, engage with, and plan for future nutrient permit requirements, regulations related to CECs such as PFAS, or other future regulatory changes?
92	SCA	9/16/24 SCA Caucus feedback transmitted by email	7	Capacity Demands	New question - How do the future rate projections (doubling in 10 years) inform and/or constrain choices across all policy areas? I.e., which discretionary policy choices are realistic given known future capital needs? This issue is applicable to the finance policy discussion also.	Comment noted. The plan will include alternatives that evaluate the degree to which incremental discretionary policy alternatives impact the sewer rate and delivery risk.
93	SCA	9/16/24 SCA Caucus feedback transmitted by email	7	Capacity Demands	Suggested edit to question 2 - Beyond the required capacity needed to meet current regulatory and contractual obligations, what level of capacity should be planned for, and what are the cost implications?	WTD deleted question 2 and incorporate elements of the question into a revised question 1.
94	SCA	9/16/24 SCA Caucus feedback transmitted by email	7	Capacity Demands	Suggested edit to question 4 - How should I/I be managed and how can costs be fairly apportioned? How much of the additional projected flow is coming from I/I versus population growth? Should I/I policy change to reduce support reducing the capacity needed for I/I?	WTD has edited the question as suggested.
95	SCA	9/16/24 SCA Caucus feedback transmitted by email	7	Capacity Demands	New question - What types of sewer cost allocation structures can incentivize I/I reduction?	Comment noted. It would be necessary to have data that distinguishes I/I contribution differences among agencies to provide a rate structure approach to incentivize or differentiate cost recovery. The current cost recovery structure is based on single family equivalent units of demand “behind the meter,” while I/I happens out in the general facilities of the system and is not related to individual customer system demands. Customer billing data is universally metered and collected, while system I/I is not similarly measured and reported. An I/I related cost recovery approach could be evaluated, though it would require new or extrapolated data sources.

Comment #	Commenter Organization	Source of comment	Page No.	Policy Category (if applicable)	Comment	WTD Response
96	SCA	9/16/24 SCA Caucus feedback transmitted by email	7	Capacity Demands	Capacity and capacity demand should be treated as a separate category from I/I, both because capacity is about more than just I/I, and also because SCA expects I/I to be a major area of policy discussion that should have its own space.	Comment noted. WTD will coordinate with the RWSP Working Group to determine categorization of policies as they are developed.
97	SCA	9/16/24 SCA Caucus feedback transmitted by email	7	Capacity Demands	WTD should begin all of the policy discussions by providing a grounding for RWQC members in existing capacity and projected capacity needs, with a clear articulation of the assumptions (which might also be future policy debate areas) behind the capacity need projections (e.g., amount of population growth, water conservation, I/I reduction).	Comment noted. WTD will include grounding information and assumptions during the RWSP Update planning process.
98	SCA	9/16/24 SCA Caucus feedback transmitted by email	7	Infrastructure resiliency	Suggested edit to question 2 - What level of resiliency should WTD plan for regarding seismic and other natural hazards? What level of risk tolerance should WTD accept? How can these considerations be best informed by the long term capital motion work in progress?	WTD has edited the question as suggested.
99	SCA	9/16/24 SCA Caucus feedback transmitted by email	7	Infrastructure resiliency	This policy area cannot be discussed in a vacuum. WTD should ensure RWQC has enough grounding information in long-term capital needs, regulatory requirements, and implications of policy decisions on rate affordability.	Comment noted. WTD will provide grounding information and assumptions during the RWSP Update planning process.
100	SCA	9/16/24 SCA Caucus feedback transmitted by email	7	Equity and Social Justice	Suggested edit to question 1 - What actions should WTD take to increase equity and social justice for the regional wastewater system (Should include definition of equity and social justice and provide more detail on how this will be interwoven in the update: community engagement, rate structure analysis, etc.).	WTD has added a new question using the suggested language.
101	SCA	9/16/24 SCA Caucus feedback transmitted by email	7	Equity and Social Justice	Suggest moving question from Finance/Affordability category to Equity and Social Justice category - What other rate relief approaches should WTD implement to improve affordability for those who may struggle to pay their sewer bill?	Comment noted. WTD prefers to keep the question in the Finance/Affordability category. As stated in the Major Policy Issues and Questions introduction, "Though a question is identified under one topic, it may also intersect with other topics in the table."
102	SCA	9/16/24 SCA Caucus feedback transmitted by email	7	Equity and Social Justice	SCA shares King County's commitment to ensuring equity and social justice (ESJ) implications are actively considered throughout the discussions for each policy area.	Comment noted. WTD appreciates SCA's shared commitment to ensuring equity and social justice implications are actively considered.
103	SCA	9/16/24 SCA Caucus feedback transmitted by email	7	Equity and Social Justice	ESJ needs to be clearly defined in WTD materials and presentations as being the principles related to the county's ESJ strategic plan, which can be related to but is distinguishable from rate affordability for all customers and rate fairness between jurisdictions and rate classes.	Comment noted. WTD will work to define ESJ more clearly in materials and presentations.
104	SCA	9/16/24 SCA Caucus feedback transmitted by email	7	Equity and Social Justice	Define and analyze the concept of "rate fairness" separate from equity and social justice.	WTD has added definitions to the scoping document and will make an effort to distinguish between the County principle of "Equity and Social Justice" and the utility industry use of "Equity" in the context of fair cost treatment / proportionate share.

Comment #	Commenter Organization	Source of comment	Page No.	Policy Category (if applicable)	Comment	WTD Response
105	SCA	9/16/24 SCA Caucus feedback transmitted by email	7	Climate Change	New question - What are the water quality issues that impact WTD rates (I/I management)? What efforts are happening in the stormwater arena that need to be taken into consideration? How much effort should be devoted to exploring whether there may be opportunities for synergy and collective action with stormwater (i.e., can we begin to break down the regulatory silos)?	Comment noted. I/I management is covered by the I/I question(s) under the Capacity Demand policy category. The RWSP Update is focused on wastewater planning but will stay informed of efforts happening in the stormwater arena.
106	SCA	9/16/24 SCA Caucus feedback transmitted by email	7	Climate Change	New question - How should WTD efforts support the water quality of Puget Sound and applicable inland waterways?	WTD has added the suggested question.
107	SCA	9/16/24 SCA Caucus feedback transmitted by email	7	Climate Change	Add climate refugees in recognition that climate change may be a driving force in our population growth over time.	Comment noted. WTD uses PSRC population data to forecast capacity needs. PSRC does not have the ability to predict changes in population from climate migration currently but has talked about including climate migration in their next Vision update. We will review new information as it becomes available to assess the impacts to our plan.
108	SCA	9/16/24 SCA Caucus feedback transmitted by email	8	Resource Recovery	New question - How can the county best support environmental benefits while instituting safeguards to protect against environmental risks of contamination? How should cost considerations be weighed?	WTD has added the suggested question.
109	SCA	9/16/24 SCA Caucus feedback transmitted by email	8	Finance / Affordability	Suggested edit to question 2 - Will WTD maintain a single uniform sewer rate per RCE (Robinswood "one for all, all for one"), or consider alternative cost recovery rate structures to reflect other system impacts? How does the ongoing rate methodology study inform this conversation?	Comment noted. The current methodology study is specific to the capacity charge, not the sewer rate. If the planning process identifies a problem that could be addressed through cost recovery structure, alternatives could be developed and evaluated to be included as a financial policy consideration.
110	SCA	9/16/24 SCA Caucus feedback transmitted by email	8	Finance / Affordability	New question - How do the future rate projections (doubling in 10 years) inform and/or constrain choices across all policy areas? I.e., which discretionary policy choices are realistic given known future capital needs? See capacity policy area above.	Comment noted. The plan will include alternatives that evaluate the degree to which incremental discretionary policy alternatives impact the sewer rate and delivery risk.
111	SCA	9/16/24 SCA Caucus feedback transmitted by email	8	Finance / Affordability	The policy choices for all the other chapters affect how much cost is incurred. Finance/rates is one of the themes that are woven into all other policy decisions.	Comment noted. WTD agrees.
112	SCA	9/16/24 SCA Caucus feedback transmitted by email	8	Finance / Affordability	Does WTD plan to cover the affordability challenge last? Why? At a minimum, there should be some discussion of the financial policies on the front end to set the stage and inform discussions in the other areas.	Comment noted. The list of major policy issues is not in priority order or chronological sequence.
113	SCA	9/16/24 SCA Caucus feedback transmitted by email	2	Project Objectives	Define equity, race, and social justice. Define the concept of "rate fairness" separate from equity and social justice.	WTD has added definitions to the scoping document and will make an effort to distinguish between the County principle of "Equity and Social Justice" and the utility industry use of "Equity" in the context of fair cost treatment / proportionate share.
114	SCA	9/16/24 SCA Caucus feedback transmitted by email	3	Challenges and Opportunities	Create a space for policy discussion on interrelated concepts that span categories, so that each policy decision is informed by its nexus with and impact on the others.	Comment noted. WTD will create a space for policy discussions on interrelated concepts during the planning process.

Comment #	Commenter Organization	Source of comment	Page No.	Policy Category (if applicable)	Comment	WTD Response
115	SCA	9/16/24 SCA Caucus feedback transmitted by email	4	Financial Policies	The work will include “developing draft policy revisions and seeking review from MWPAAC and stakeholders.” Stakeholders should explicitly include RWQC, cities and sewer districts.	WTD has revised the scoping document on page 5 to say "Developing draft policy revisions and seeking review from the RWSP Working Group with members from MWPAAC, RWQC staff, and SCA."
116	SCA	9/16/24 SCA Caucus feedback transmitted by email	4	Capital Program Plan, EIS, and Policies	Be clearer about addressing climate change impacts when we discuss future planning. Example – when we discuss planning for population growth, does that include planning for climate refugees, too?	Comment noted. WTD will work to be clearer about addressing climate change impacts when discussing future planning.
117	SCA	9/16/24 SCA Caucus feedback transmitted by email	5	Regional Engagement	The scoping document states that regional engagement is to take place “throughout the planning process.” However, what and who does that entail? Need more context on whether a formal regional engagement strategy will be presented to RWQC/MWPAAC later in the process to touch on which groups and stakeholders are engaged (who, what, when, where, how).	Comment noted. Regional engagement can be one of the topics coordinated with the RWSP Working Group mentioned in response to Comment #1.
118	SCA	9/16/24 SCA Caucus feedback transmitted by email	5	Regional Engagement	Unclear why neighborhood groups and homeowner associations are on the list – which part of the plan would they be providing input on? SCA recommends putting the vision development sooner in the process to get more quality and meaningful engagement.	Comment noted. WTD will engage a wide range of interested and affected parties to ensure they are informed and involved with the project. Neighborhood groups and homeowner associations may provide input to the Vision for clean water and the strategies developed to guide the future wastewater system.
119	SCA	9/16/24 SCA Caucus feedback transmitted by email	5	Regional Engagement	Sound Cities Association should be listed as a regional engagement partner (beyond just “local jurisdictions”).	WTD has revised the scoping document to include Sound Cities Association as a regional engagement partner as suggested.

Regional Vision for Clean Water

RWQC

December 4, 2024



King County

Department of Natural Resources and Parks
Wastewater Treatment Division

Video

Look out 75 years to 2100

Describe what we want for future generations

- *Imagine what's possible if we get this right...*

Include shared regional values, such as:

- Water quality and public health
- Equity and social justice
- Affordability
- Sustainability, stewardship, and resiliency
- Climate and hazard resiliency



**Vision for
Clean Water**

2100

King County

**Regional Wastewater
Services Plan Update**

2024

2024 2025 2026 2027 2028 2029

Early Project Tasks
(Scoping, Charter)



We are here

Vision for Clean Water
(including Challenges and Opportunities document)



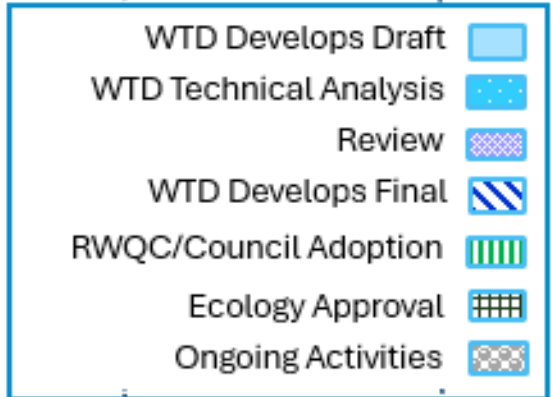
Financial Policies



Capital Program Plan, EIS
and Policies



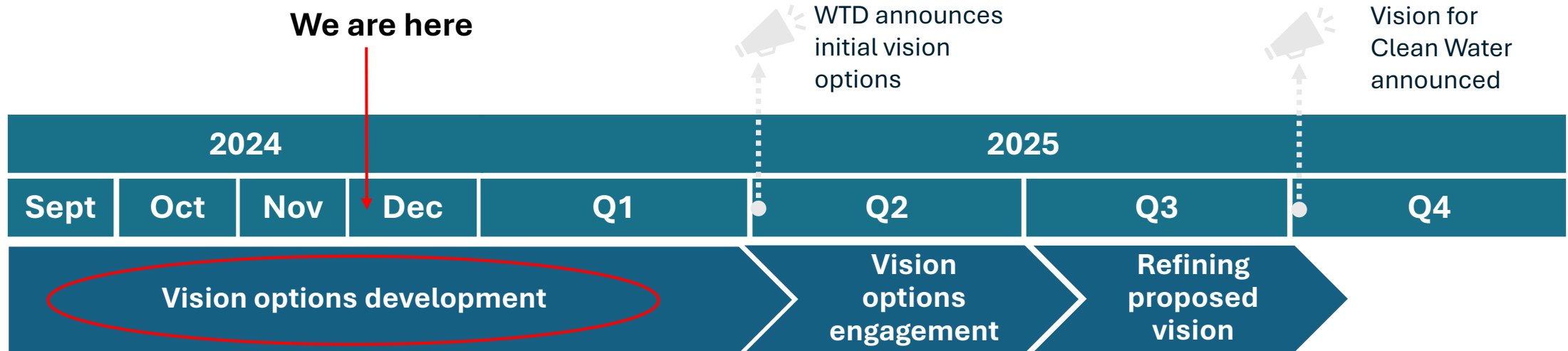
Regional Engagement



King County

Department of Natural Resources and Parks
Wastewater Treatment Division

Process to develop the Regional Vision for Clean Water





RWQC Touch Points

- Jan/Feb 2025: RWSP Charter
- March 2025: Vision Options preview
- April 2025: Vision Options announced
- Q2 2025: Discussion of Vision options
- Q2 2025: Broad-based public engagement on Vision Options
- Q3/Q4 2025: Initial Review of draft Financial Policies

Questions



King County

Department of Natural Resources and Parks
Wastewater Treatment Division

RWQC Meeting Materials

60 of 75

December 4, 2024



Puget Sound Nutrients Briefing

Regional Water Quality Committee

December 4, 2024

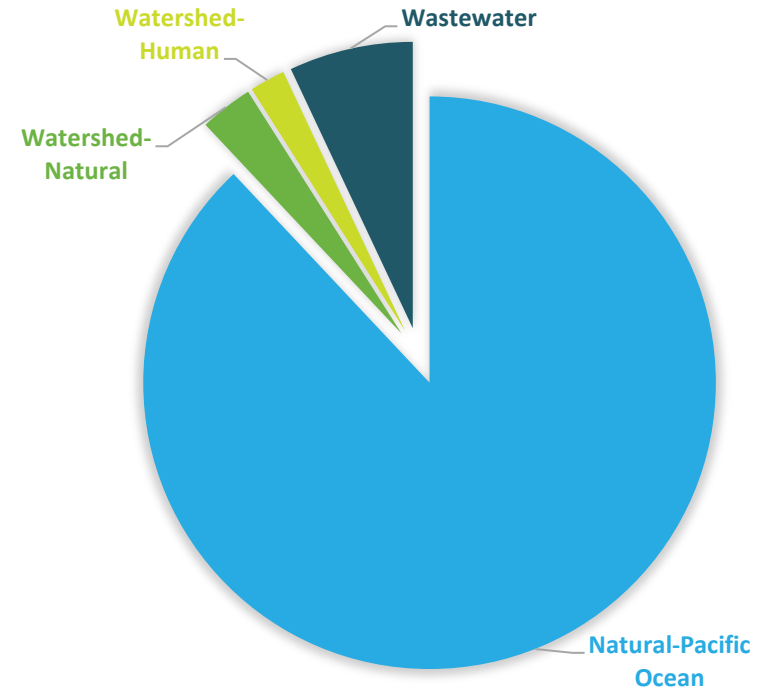
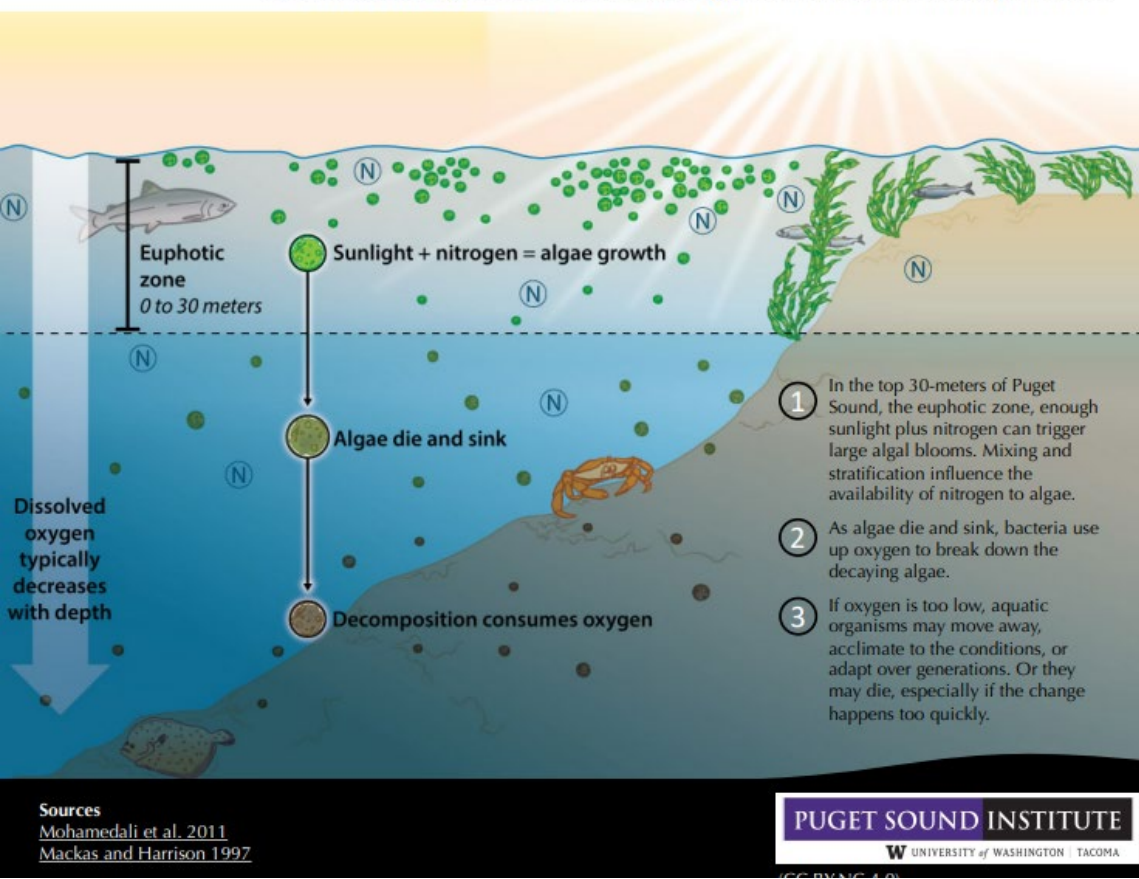


AGENDA

- Overview of nutrients and impact to Puget Sound
- Describe current and future nutrient regulations
- King County actions and next steps on nutrient management



Too much nitrogen can lead to low oxygen which can harm aquatic life



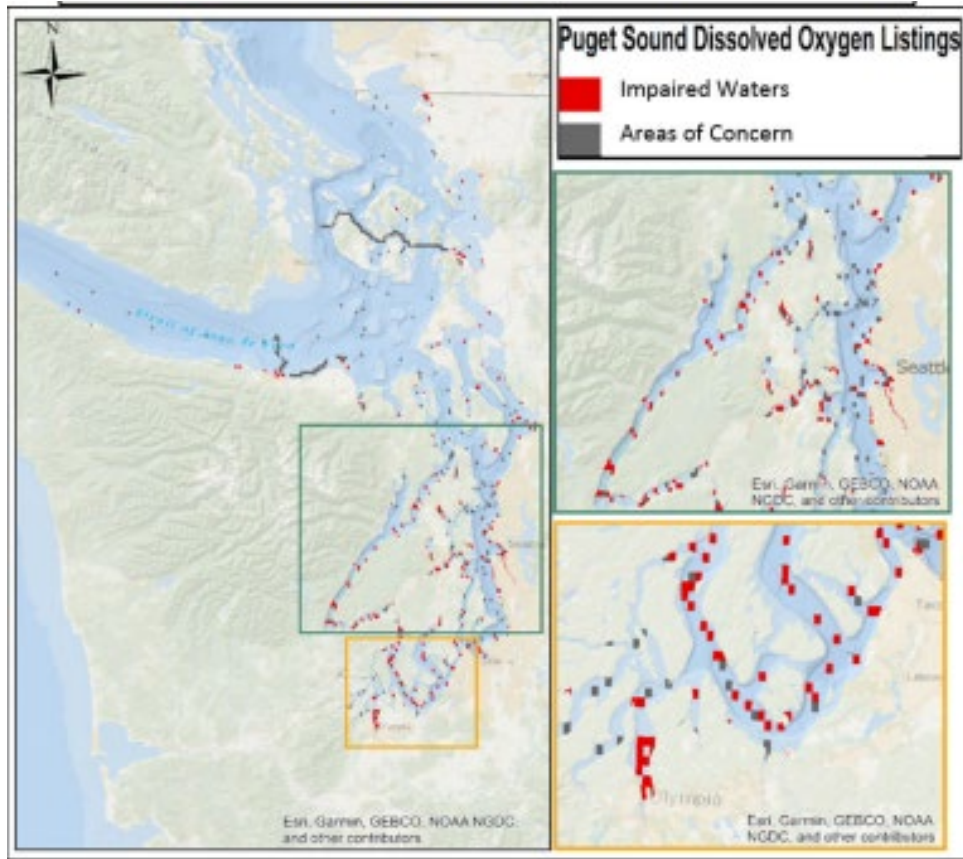
Why do we care about nitrogen?

Too much nitrogen can lead to large algal blooms that deplete oxygen due to algal decomposition.

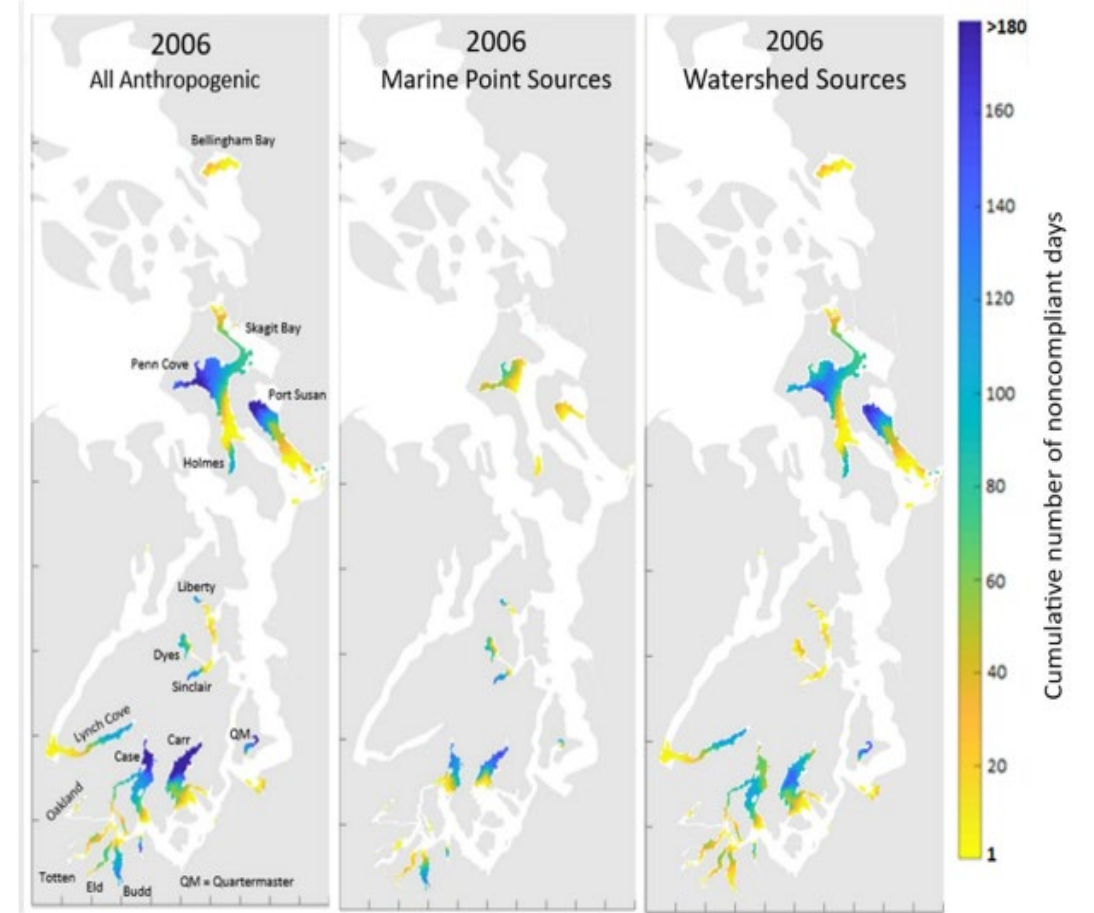
Where does nitrogen come from?

91% natural sources
9% human sources

Why regulate nitrogen?



Approximately 140 areas within in Puget Sound have impaired dissolved oxygen for aquatic life



Ecology's Salish Sea Model indicates Puget Sound wastewater plants are contributing to DO impairments

PUGET SOUND NUTRIENT GENERAL PERMIT (2022-2026)

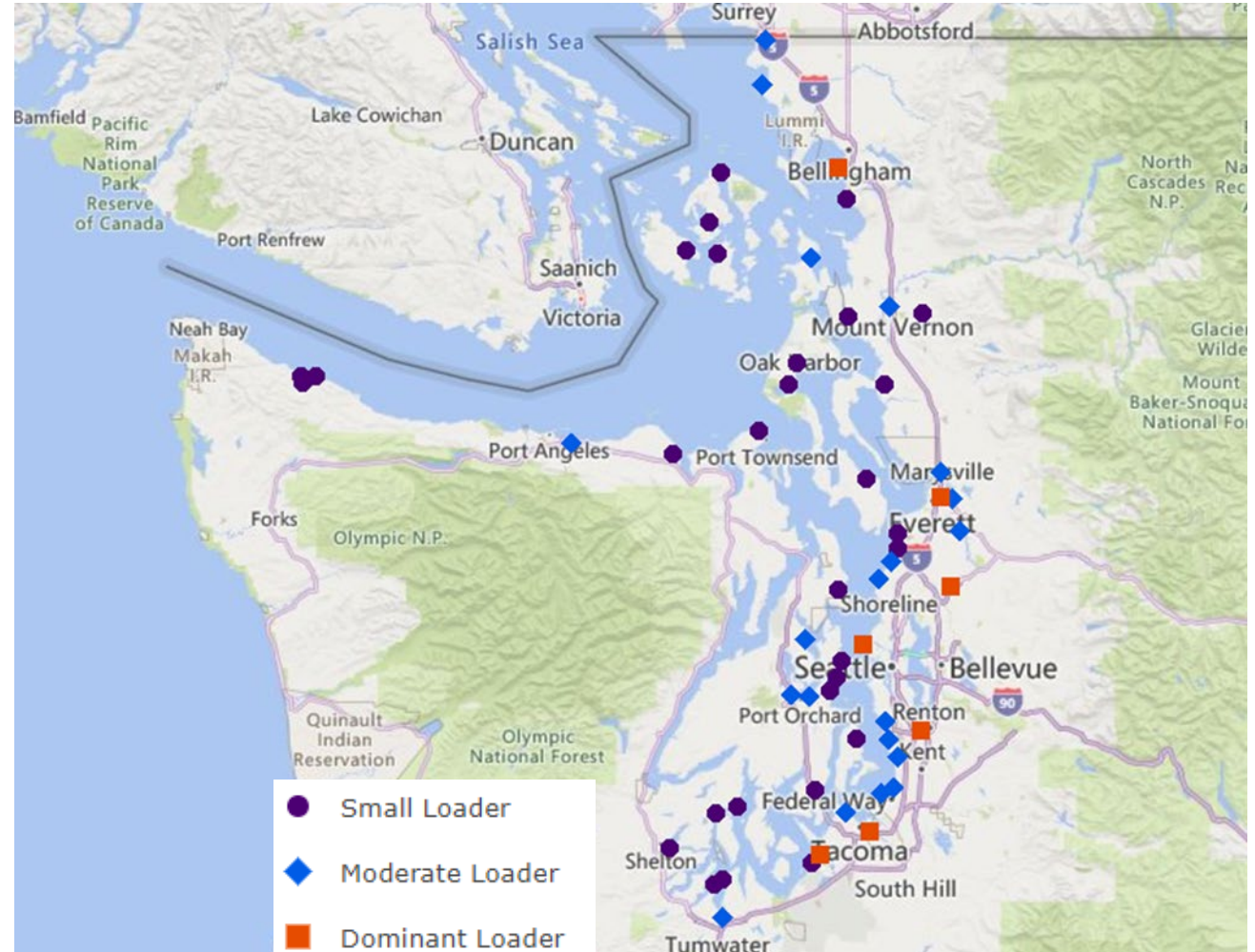
Key permit features:

- **Action Levels** - Hold nitrogen (total inorganic nitrogen or TIN) loadings steady
- **Optimization** – minor changes to plant operations to reduce nitrogen
- **Monitoring & Reporting** – monitor & report nitrogen in influent and effluent
- **Nutrient Reduction Evaluation** - Planning to meet future nitrogen limits

Large utilities can operate under a “bubbled” discharge.

West Point, Brightwater, South Plant operate under a bubbled action level.

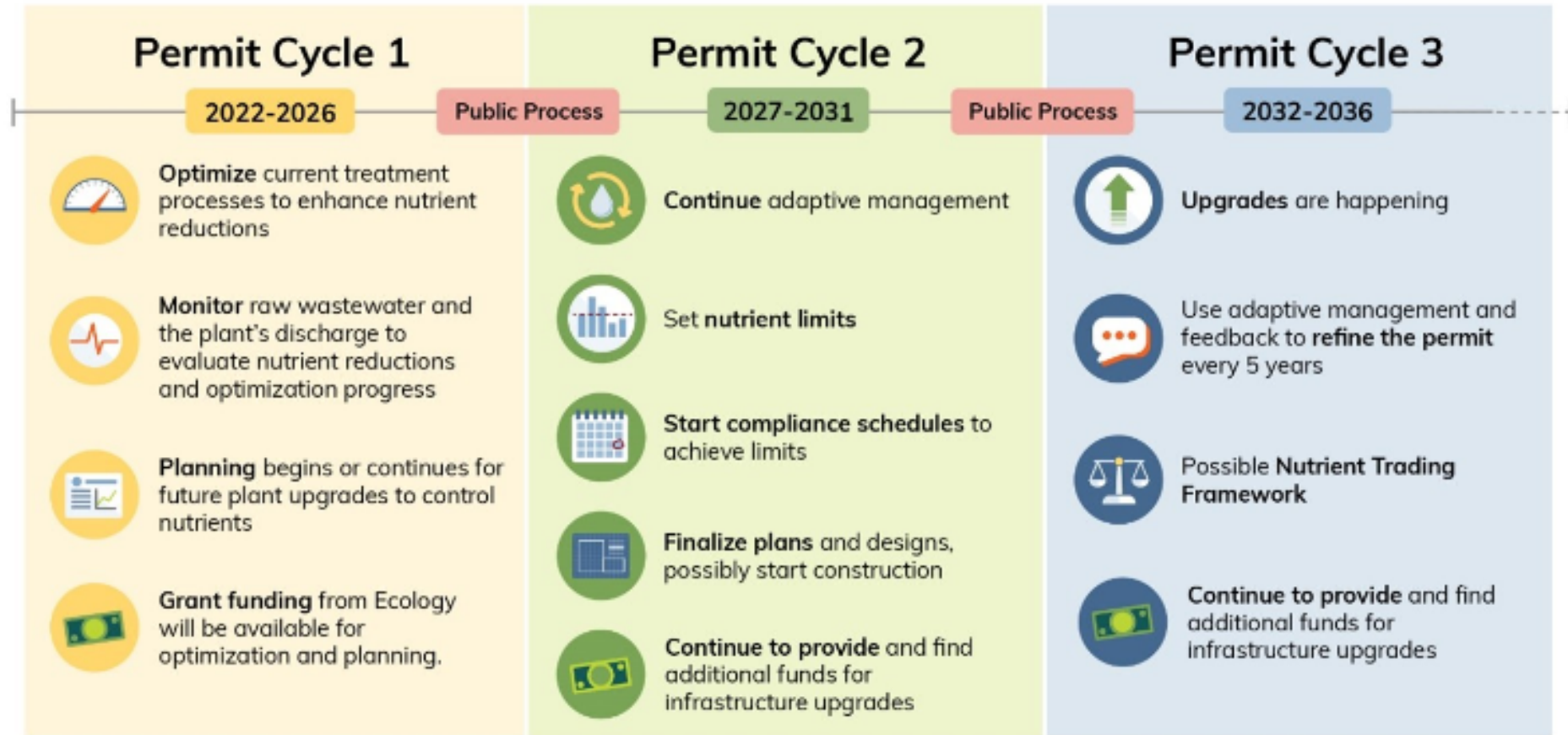
Vashon operates under a separate small discharge action level.



Source: Washington Department of Ecology

FUTURE NUTRIENT REGULATORY OUTLOOK

Puget Sound Nutrient General Permit Cycles



Source: Washington Department of Ecology, May 2, 2024

Puget Sound Nutrient General Permit Implementation



WTD'S CURRENT ACTIONS TO REDUCE NITROGEN



Optimizing our
wastewater treatment
processes to improve
nitrogen removal

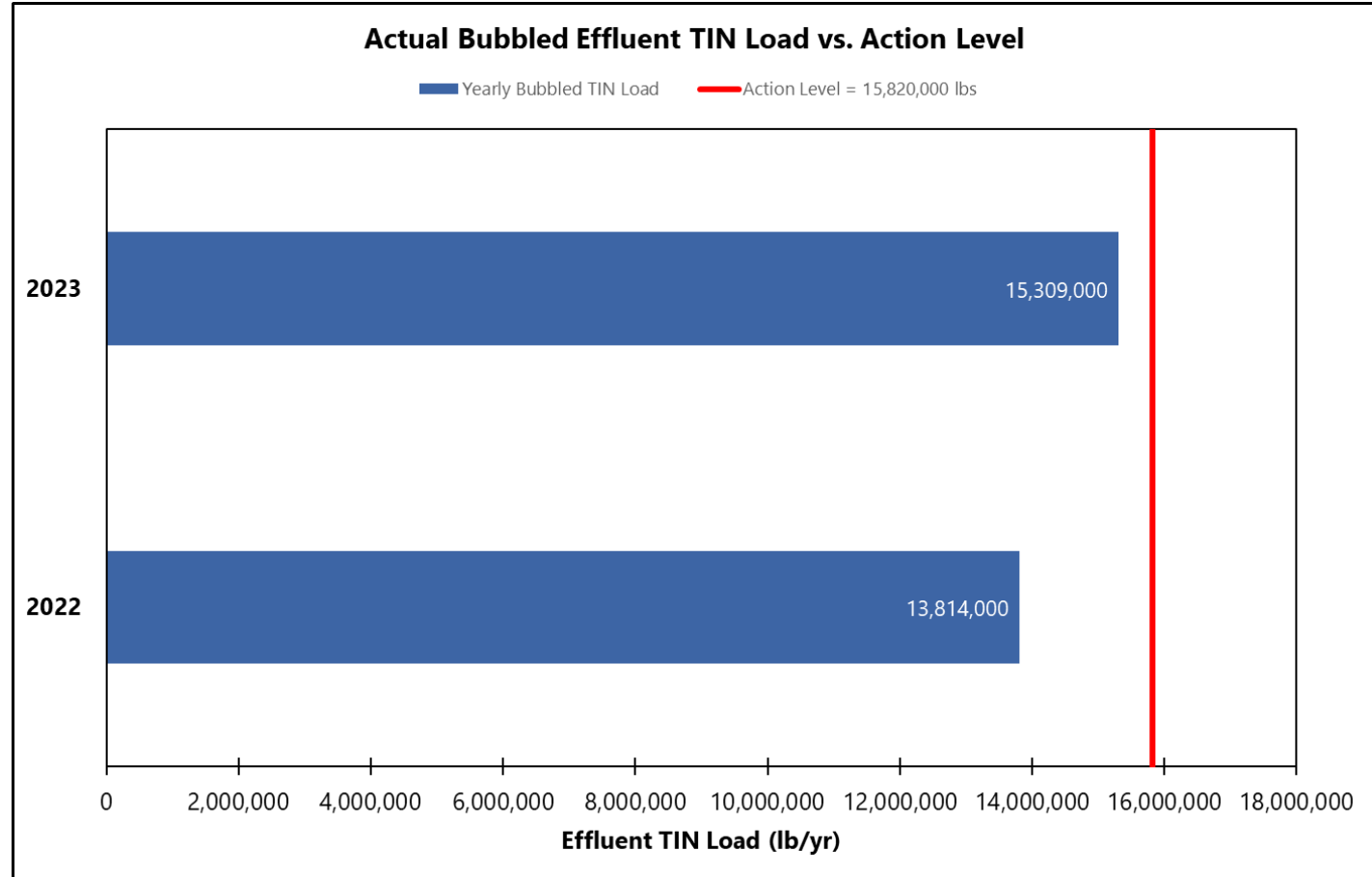
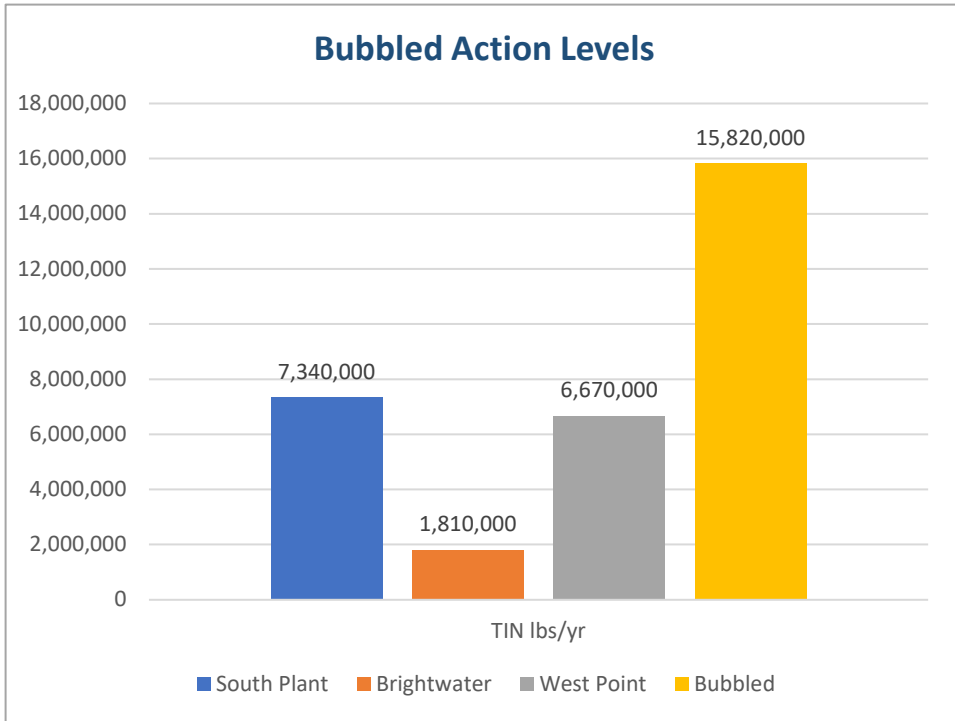


Monitoring and
modeling to analyze
inputs of nitrogen,
forecast loading, and
assess performance



Evaluating future
options for nutrient
reduction

WTD'S NITROGEN ACTION LEVELS AND PERFORMANCE

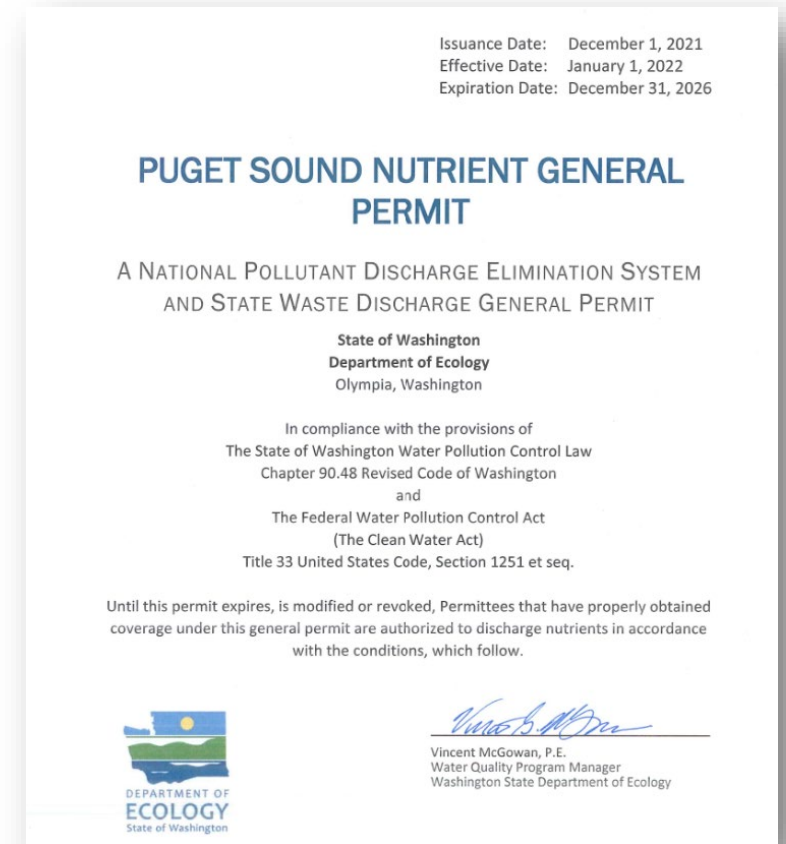


NUTRIENT REDUCTION EVALUATION

- Required by the PSNGP
- Must be submitted to Ecology by December 31, 2025
- Requires study of implementing nutrient removal at two levels:
 - 3 mg/l TIN, seasonally (April – October)
 - AKART = the greatest nitrogen removal that is reasonably feasible on an annual basis (AKART)

PSNGP mandates that the study include:

- Wastewater characterization and treatment technology review
- Consideration of alternative effluent management
- Economic evaluation and environmental justice review
- Implementation timeline



KING COUNTY MARINE SCIENCE INVESTMENTS



King County Marine Science

King County collects a variety of physical, chemical and biological data within King County and the Whidbey Basin.

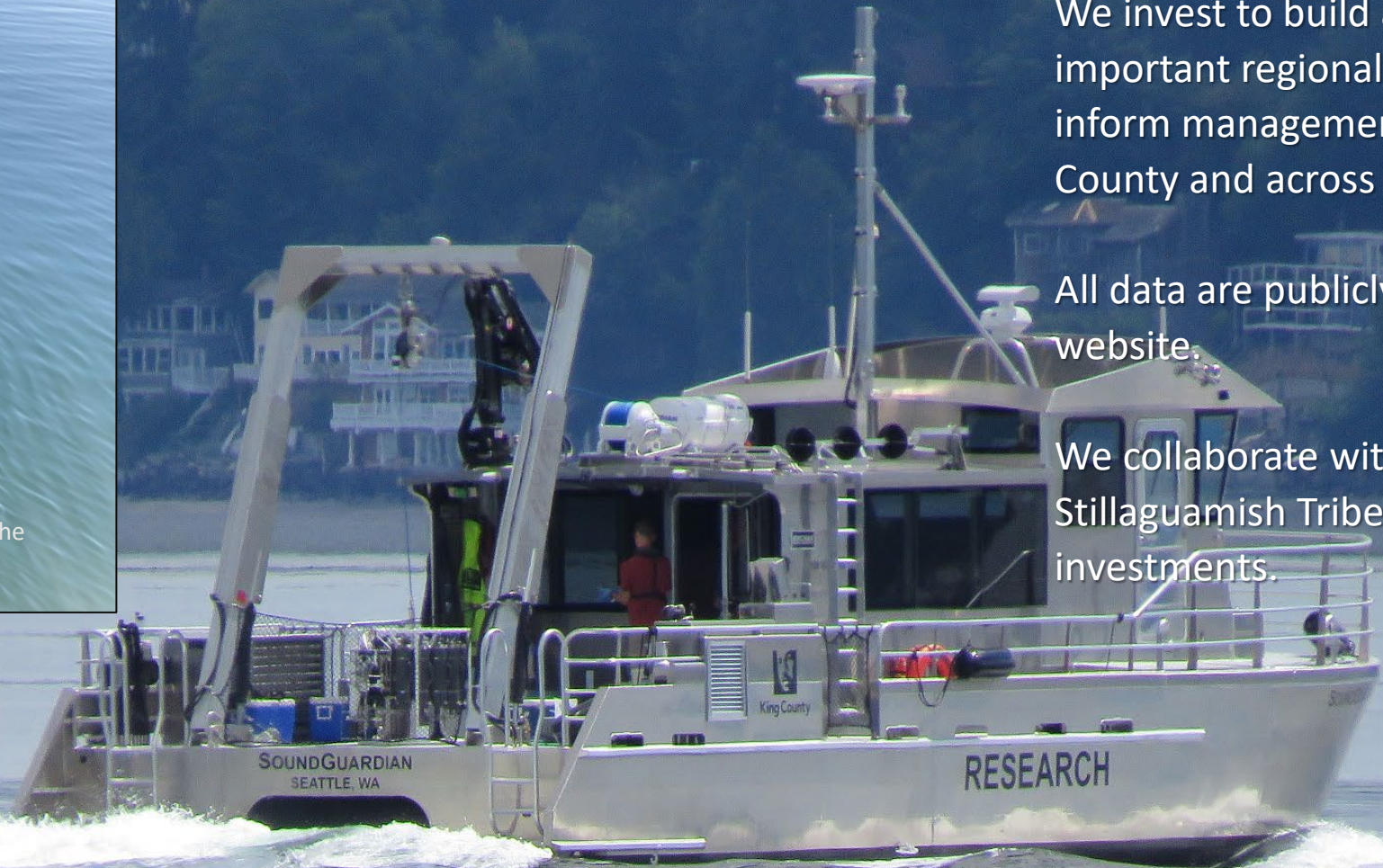
We invest to build and maintain this important regional science dataset to inform management decisions at King County and across Puget Sound.

All data are publicly available on our website.

We collaborate with other partners, like Stillaguamish Tribe, to leverage science investments.



Port Susan buoy
Monitoring Collaboration with the
Stillaguamish Tribe



Questions?

Jacque Klug

Nutrient Management Coordinator

Jacque.Klug@kingcounty.gov



King County

Department of Natural Resources and Parks

RWOC Meeting Materials

Wastewater Treatment Division



RWQC Monthly Work Program for 2024

Updated December 4, 2024

The suggested topics are based on the latest scheduling information available. The committee will adjust the schedule throughout the year to accommodate any necessary changes.

January–No meeting

February 7, 2024 (In-person)

- ✓ Election of Vice-Chair.
- ✓ Introduction to the Regional Water Quality Committee and the Regional Wastewater Treatment System.
- ✓ Status update on the long-term forecasting work requested by Motions 16410 and 16449.
- ✓ Regional Water Quality Committee 2024 Work Program development and priority setting.
- ✓ Rates: High level briefing on major policy issues and cost drivers likely to impact 2025 rates.

March 6, 2024

- ✓ Discussion of resolution expressing RWQC’s interest in sewer rate and capacity charge and requesting MWPAAC continue performing a technical review of rates.
- ✓ Wastewater Treatment Division 2025 rate recommendation.
- ✓ Regional Wastewater Services Plan Update.
- ☐ Report from WTD as requested by Motion 16410 on recommended methodology for forecasting long term costs of its capital improvement needs. (Deferred until April)

April 3, 2024

- ✓ Regional Wastewater Services Plan Update.
- ✓ Report from WTD as requested by Motion 16410 on recommended methodology for forecasting long term costs of its capital improvement needs.
- ✓ Overview of the policies that determine how regional wastewater system costs are shared and the sewer and capacity charge are structured.
- ✓ Discussion of resolution expressing RWQC’s interest in sewer rate and capacity charge and requesting MWPAAC continue performing a technical review of rates.

May 1, 2024– CANCELLED

June 5, 2024

- ✓ Briefing Regional Wastewater Services Plan Update.
 - Policy topics for discussion: Policy application K.C.C. 28.86.030 and Treatment Plant Policies K.C.C. 28.86.050
- ✓ Briefing on 2025 Proposed Sewer Rate and Capacity Charge.

- ✓ John Taylor, Director, Department of Natural Resources and Parks

July 3, 2024—July 15, 9:30 a.m. SPECIAL MEETING

- ✓ Briefing Modified Combined Sewer Overflow Consent Decree.
- ✓ Briefing Regional Wastewater Services Plan Update.
 - Guiding principles for RWSP Update
 - Policy topics for review from prior meeting: Policy application K.C.C. 28.86.030 and Treatment Plant Policies K.C.C. 28.86.050
 - RWSP Scope
- ✓ Status briefing on the progress in developing a long-term financial and sewer rate forecast per Motion 16449. Written update.

August 7, 2024 CANCELLED DUE TO RECESS

September 4, 2024 (In-person)

- ✓ Briefing Regional Wastewater Services Plan Update.
 - RWSP scope and input on policy issues to be addressed
 - Resolution on Guiding Principles for RWSP Update

October 2, 2024

- ✓ Regional Wastewater Services Plan Update: Status Report.
- ✓ Contaminants of Emerging Concern (CEC): Update on Efforts to Reduce and Control PFAS and CECs as Requested by Motion 16434.
- ✓ 2025 Proposed WTD Capital Improvement Program.
- ✓ Stormwater Study Session Part 1: Understanding the problem.
 - Threat to Puget Sound and relationship to wastewater.
 - Existing regulatory stormwater framework, including the role of King County and cities.
 - Existing funding framework.

November 6, 2024

- ✓ Regional Wastewater Services Plan
- ✓ Executive's 2025 WTD Operating and Capital Budget

December 4, 2024

- Regional Wastewater Services Plan Update: Follow-up from September 2, 2024 Discussion of Scope of Work for the RWSP Update and Next Steps
- Puget Sound Nutrients

RWQC staff will work throughout the year to coordinate with MWPAAC staff to align work programs of both committees.