

**MUCKLESHOOT INDIAN TRIBE**  
**Fisheries Division**

39015 - 172<sup>nd</sup> Avenue SE • Auburn, Washington 98092-9763  
Phone: (253) 939-3311 • Fax: (253) 931-0752



March 7, 2011

Christie True, Director  
King County Department of Natural Resources and Parks  
201 S Jackson St - Room 700  
Seattle, WA 98104-3855

Dear Ms. True,

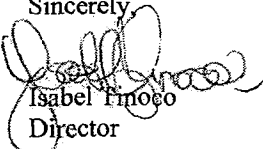
We have reviewed the County's Reclaimed Water Comprehensive Plan's Reclaimed Water Strategies and we suggest moving these strategies forward for further analysis. Further analysis of the technical issues, environmental challenges and opportunities for the strategies presented will help determine to what extent reclaimed water can be used to protect and improve water quality and stream flows for fish in the region.

Our feedback to the Wastewater Treatment Division during the County's reclaimed water planning process has been to favor the direct use of reclaimed water to offset the use of existing ground and surface water supplies. We also favor the concept of using reclaimed water for indirect stream flow augmentation (e.g., through infiltration and wetland enhancement) in a manner that mimics the natural storage and release patterns of groundwater inflows to streams, and importantly, with treatment that removes pollutants including emerging contaminants. We appreciate that the Reclaimed Water Strategies presented are largely consistent with these objectives.

We are encouraged that one of the reclaimed water strategies focuses on the Sammamish River through the Redmond/Bear Creek Basin. Using reclaimed water for wetland augmentation and groundwater infiltration warrants further analysis as a mechanism to increase coldwater inflows to the Sammamish River and its tributaries. The Sammamish River is used by large numbers of salmon, and river temperatures often exceed State water quality standards established to protect fish.

Along with water conservation, municipal water supply source exchange, riparian improvements, and perhaps other measures, we believe that reclaimed water is a promising tool to help address ongoing water resource problems including low base stream flows and water temperature impairments in WRIAs 8 and 9.

Thank you for the opportunity to review the current Reclaimed Water Strategies report. If you have any questions, please contact Holly Coccoli at 253-876-3360.

Sincerely,  
  
Isabel Finoco  
Director

Cc: Steve Tolzman and Mark Buscher, Wastewater Treatment Division



# Puget Sound Partnership

our sound, our community, our chance

March 25, 2011

The Honorable Larry Gossett  
Chair, Regional Water Quality Committee  
Metropolitan King County Council  
516 Third Ave., Rm. 1200  
Seattle, WA 98104

Dear Councilmember Gossett:

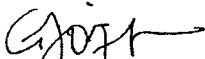
I am writing in support of King County Wastewater Treatment Division's proposal to study the potential expansion of the county's reclaimed water comprehensive planning process to consider non-potable uses such as wetland enhancement, streamflow enhancement, irrigation, and industrial non-potable uses. King County is an important partner in helping implement the Action Agenda for recovering Puget Sound by 2020. The county's proposal would support several proposed actions and strategies in the Action Agenda for recovering Puget Sound by 2020, including:

- A.3, "Protect and conserve freshwater resources to increase and sustain water availability for instream and human uses."
- A.3.1, "Implement and update streamflow protection and enhancement programs."
- A.3.1.4, "Develop and implement collaborative, innovative programs to meet instream and out of stream flow needs."
- A.3.3, "Expand and promote opportunities to reuse and reclaim water resources."
- A.3.3.1, "Establish rules or standards that promote the use and reuse of reclaimed water and are protective of both the health of people and species."

I understand the Regional Water Quality Committee of the King County Council is expected to vote on this proposal at their April 6th meeting. I encourage the Committee to support King County's proposal to study possible expanded non-potable reclaimed water uses for consideration as part of the county's reclaimed water program. Considering all potential reclaimed water uses will help identify the most appropriate and effective approaches to increasing and sustaining water availability for instream and human uses.

Thank you for your consideration.

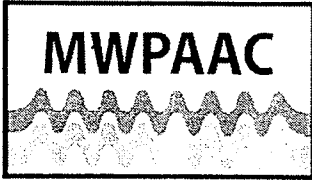
Sincerely,



Gerry O'Keefe  
Executive Director

cc: Christie True, Director, King County Department of Natural Resources & Park





## Metropolitan Water Pollution Abatement Advisory Committee

King Street Center, 201 South Jackson Street, MS KSC-NR-0512  
Seattle, WA 98104 206-263-6070

### MEMBERS:

Alderwood Water and  
Wastewater District  
City of Algona  
City of Auburn  
City of Bellevue  
City of Black Diamond  
City of Bothell  
City of Brier  
City of Carnation  
Cedar River Water and Sewer District  
Coal Creek Utility District  
Cross Valley Water District  
Highlands Sewer District  
City of Issaquah  
City of Kent  
City of Kirkland  
City of Lake Forest Park  
Lakehaven Utility District  
City of Mercer Island  
Midway Sewer District  
Northeast Sammamish Sewer District  
Northshore Utility District  
Olympic View Water and Sewer District  
City of Pacific  
City of Redmond  
City of Renton  
Ronald Wastewater District  
Sammamish Plateau Water and  
Sewer District  
City of Seattle  
Skyway Water and Sewer District  
Soos Creek Water and Sewer District  
Southwest Suburban Sewer District  
City of Tukwila  
Val Vue Sewer District  
Vashon Sewer District  
Woodinville Water District  
0508\_MWWPAACtrhd.eps

March 25, 2011

The Honorable Larry Gossett, Chair  
Regional Water Quality Committee  
516 3rd Ave.  
Seattle, WA 98104

SUBJECT: Reclaimed Water Comprehensive Plan – Reclaimed Water  
Strategies Proposed Legislation (2011-0096)

Dear Councilmember Gossett:

King County Executive Dow Constantine has proposed a motion to approve three reclaimed water strategies to move forward with engineering, economic, and environmental analyses as part of the Reclaimed Water Comprehensive Plan (RWCP).

The Metropolitan Water Pollution Abatement Advisory Committee (MWWPAAC) has reviewed the Executive's proposal and based on the concerns noted below, **MWWPAAC does not support moving the three proposed strategies forward at this time. The vote was 14 to 5 with the majority representing 87 percent of the King County residential customer equivalents (RCEs) voting.** The voting record for the March 23, 2011 meeting regarding this recommendation is attached for reference.

**We strongly recommend that the overall RWCP take a detour and move on to Step 8-B before deciding on whether or not to move forward on these strategies. This would allow time to develop guiding principles, financial policies, and any needed amendments to Regional Wastewater Services Plan policies to guide existing and any potential future reclaimed water program. This is prudent because the policies that are developed may well influence which strategies would be good to move forward.**

MWWPAAC has the following concerns:

- MWWPAAC does not believe there is a sufficient nexus between the three reclaimed water strategies and King County Wastewater responsibilities to justify using wastewater revenues for this work. We believe, based on the *Lane vs Seattle* court case, wastewater revenues should not be used to fund the engineering, economic, and environmental analyses for reclaimed water used for wetland and stream enhancements. If the County believes there is a nexus that passes this legal hurdle, MWWPAAC would like to receive that information.

- Recent reclaimed water studies by Seattle Public Utilities (SPU) and a joint study by King County/Covington Water District both concluded that **implementing reclaimed water programs was not a sound investment for the region due to its high cost, low level of benefits and other lower cost alternatives.**
- The Redmond/Bear Creek Basin Brightwater Centralized Strategy and the Renton/Tukwila South Plant Centralized Strategy are both very similar to the two studies done by SPU and Covington and there is nothing to indicate the two proposed strategies would have a different conclusion from the findings from the SPU and Covington studies. The Reclaimed Water Skimming or Polishing Decentralized Strategy is very conceptual and without having specific sites to consider there is no way to conduct a realistic analysis. **For this reason, we believe it is not a good policy decision to continue to spend significant regional funds on these proposed strategies.**
- Clearly, one of the proposed uses for reclaimed water is to augment water supplies. While it seems very clear that the overall water supply in the region is adequate for years to come, there may be localized water supply issues. However, MWPAAC does not believe that the region should be subsidizing the water supply needs using either wastewater rate funds for these local communities. If there is an interested party looking to augment their local water supply, then that agency should be responsible for funding analysis and construction of reclaimed water facilities as a water supply alternative.

Thank you for your consideration of our comments.

Sincerely,



Scott Thomasson  
MWPAAC Chair

Enclosure (1)

cc: The Honorable Dow Constantine, King County Executive  
King County Council Members  
Regional Water Quality Committee Members  
Metropolitan Water Pollution Abatement Advisory Committee Members  
Christie True, Director, King County Department of Natural Resources and Parks  
(DNRP)  
Pam Elardo, Director, Wastewater Treatment Division, DNRP

Metropolitan Water Pollution Abatement Advisory Committee (MWPAAC)  
 General Meeting

Vote on Reclaimed Water Recommendation Letter – March 23, 2011

Agency	Member	Alternate	Other Attendees	Yea	Nay
Alderwood Water & Wastewater District					
City of Auburn	Bill Pelozo				
City of Bellevue	Don Davidson			✓	
City of Bothell					
City of Carnation					
Cedar River	Wes Jorgenson			✓	
Coal Creek					
Cross Valley	Mark Cassell				✓
City of Issaquah					
City of Kent					
City of Kirkland	Bobbi Wallace				✓
City of Lake Forest Park					
Lakehaven Utility District	Ron Nowicki			✓	
City of Mercer Island					
Midway Sewer District					
NE Sammamish Sewer and Water	Paul Sentena			✓	
Northshore Utility District	Margaret Wiggins			✓	
Olympic View Water and Sewer					
City of Redmond	Scott Thomasson			✓	
City of Renton	Dave Christensen				✓
Ronald Wastewater District	Arne Lind			✓	
Sammamish Plateau Water & Sewer Dist	Mary Shustov			✓	
City of Seattle	Trish Rhay			✓	

