

RWSP Update Scoping Document Comments

Reference document link

[DraftRWSPScopingDocument.docx](#)

Comment #	Commenter Organization	Source of comment	Page No.	Policy Category (if applicable)	Comments (Note: WTD responses to be provided by Nov. 6 meeting)
1	MWPAAC	8/28 MWPAAC general meeting - WTD staff notes			How will MWPAAC be involved?
2	MWPAAC	8/28 MWPAAC general meeting - WTD staff notes			Some contracts expire in 2036. What is timing of restarting contract negotiations?
3	MWPAAC	8/28 MWPAAC general meeting - WTD staff notes			Want documents more than the day before - as early as possible
4	MWPAAC	8/28 MWPAAC general meeting - WTD staff notes			In future, when material is sent, please send how WTD wants feedback and timeframe for comments.
5	MWPAAC	8/28 MWPAAC general meeting - WTD staff notes	2		Why is visioning in the middle of the process? Why not sequential? Vision would be most helpful if established earlier.
6	MWPAAC	8/28 MWPAAC general meeting - WTD staff notes	2		Where does decision making fit - like for risk and level of service?
7	MWPAAC	8/28 MWPAAC general meeting - WTD staff notes	2		Vision would/should inform how policy issues are prioritized.
8	MWPAAC	8/28 MWPAAC general meeting - WTD 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.
9	MWPAAC	8/28 MWPAAC general meeting - WTD staff notes	4		Some concern about three alternatives. Will want to mix and match. Pioneering utility looks intimidating since it's so expensive. What about best practice as an alternative?
10	MWPAAC	8/28 MWPAAC general meeting - WTD 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 for opportunities as we go through this process.

11	MWPAAC	8/28 MWPAAC general meeting - WTD staff notes	7		Suggest a new policy topic/category - relationship to contracts
12	MWPAAC	8/28 MWPAAC general meeting - WTD staff notes	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?
13	MWPAAC	8/28 MWPAAC general meeting - WTD staff notes	7	Equity and Social Justice	Hope equity and social justice can be expanded to include equity among contract agencies since not all agencies 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.
14	MWPAAC	8/28 MWPAAC general meeting - WTD staff notes	7		Some of the major policy issues/questions are technical and not policy.
15	MWPAAC	8/28 MWPAAC general meeting - WTD staff notes	7	Capacity Demands	Capacity for growth question contains a lot - need to break out more to understand.
16	MWPAAC	8/28 MWPAAC general meeting - WTD staff notes	7	Infrastructure resiliency	Risk tolerance is a key policy question - very nuanced and varies across system
17	MWPAAC	8/28 MWPAAC general meeting - WTD 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.
18	MWPAAC	9/4/24 RWQC Meeting packet			Some of the major policy issues/questions are technical and not policy.
19	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?

20	RWQC	9/4/24 RWQC Meeting - staff notes			Need for a project charter to serve as a framework
21	RWQC	9/4/24 RWQC Meeting - staff notes	7	Equity and Social Justice	Need more clarity on equity and affordability - is it a social issue or a financial issue? Is fairness a better definition?
22	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.
23	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.
24	RWQC	9/4/24 RWQC Meeting - staff notes	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.
25	RWQC	9/4/24 RWQC Meeting - staff notes	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.
26	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.
27	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.
28	RWQC	9/4/24 RWQC Meeting - staff notes			Who decides on the vision? Need to understand roles and decision-making process.
29	RWQC	9/4/24 RWQC Meeting - staff notes			Need to start with the mission and vision first and identify constraints/restraints.
30	RWQC	9/4/24 RWQC Meeting - staff notes			What's the difference between Vision for Clean Water versus vision for regional wastewater system?
31	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, i.e., the ability to deliver.

32	RWQC	9/4/24 RWQC Meeting - staff notes	7	Infrastructure resiliency	Infrastructure resiliency and taking care of maintenance is also important.
33	RWQC	9/4/24 RWQC Meeting - staff notes	8	Finance / Affordability	Affordability might be a stand alone item.
34	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?
35	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?
36	RWQC	9/4/24 RWQC Meeting - staff notes	7	Equity and Social Justice	Need more definition on things like equity and affordability.
37	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?
38	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?
39	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.
40	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.
41	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?
42	RWQC	9/4/24 RWQC Meeting - staff notes	2		On Figure 1, are the tasks in priority order or are they just convenient. Why isn't visioning first?
43	RWQC	9/4/24 RWQC Meeting - staff notes	8	Finance / Affordability	We should go back and review the Robinswood agreement and policies. What was in it? Should it change and if so, how?

44	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.
45	RWQC	9/4/24 RWQC Meeting - staff notes			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.
46	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.
47	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.
48	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.
49	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.
50	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.

51	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
52	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.
53	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.
54	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.
55	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.
56	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.
57	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.

58	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.
59	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.
60	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.
61	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.
62	Sewer Districts	9/5/24 Sewer District Policy Paper transmitted by email	8	Finance / Affordability	Individual connection charges should not include costs associated with those units of growth that are not being assessed.
63	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.
64	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.

65	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	7	Regulatory Landscape	Acknowledge and agree with RWQC comments from Sept. 4 meeting recognizing stormwater is not explicitly covered in any of the policy areas. Propose consideration of including a stormwater policy and acknowledge the significant contribution that stormwater makes to overall pollution in the Puget Sound and other water bodies in the service area. The intent is not to take on stormwater projects in the RWSP Update, but about where to draw the line.
66	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.
67	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.
68	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	7	Regulatory Landscape	Distinguish between policy vs. engineering/technical questions.
69	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.
70	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	7	Capacity Demands	Some questions seem to be technical vs. 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.
71	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.
72	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.
73	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.

74	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	7	Capacity Demands	What steps have Seattle and King County taking to retrofit their systems to reduce CSO impacts through separated system investments? Are there any policies that address that?
75	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 continuing investment in the maturity of the long range forecasting tools and methods.
76	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.
77	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.
78	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.
79	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.
80	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.
81	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?

82	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.
83	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.
84	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.
85	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	7	Climate Change	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.
86	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.
87	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 it is 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.

88	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	8	Resource Recovery	<p>Recycled Water - 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.</p> <p>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.</p>
89	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	8	Resource Recovery	<p>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.</p>
90	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	8	Resource Recovery	<p>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.</p>
91	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	8	Finance / Affordability	<p>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.</p>
92	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	8	Finance / Affordability	<p>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.</p>
93	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	8	Finance / Affordability	<p>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.</p>
94	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	8	Finance / Affordability	<p>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.</p>
95	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes			<p>Is there a place for a defined update frequency for the RWSP?</p>
96	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes			<p>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.</p>

97	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes	2		MWPAAC and RWQC have concerns around the Vision effort running concurrent with other efforts such as tasks 6 and 7 which are policy areas. A defined vision is beneficial to the subsequent efforts and inform the priority and direction for the other efforts.
98	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes			It would be good to see what the vision was in 1999? Does that history serve as an orientation? Are there elements that should be common and shared?
99	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes			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?
100	MWPAAC	9/5/24 MWPAAC subcommittee meeting notes			How can MWPAAC members participate and contribute in this process, not necessarily as decision makers, but members that support and participate in the process?
101	SCA	9/16/24 SCA Caucus feedback transmitted by email	2		Set a clear vision for the plan earlier in the process. This is an opportunity to build regional consensus and buy-in on how service costs are distributed.
102	SCA	9/16/24 SCA Caucus feedback transmitted by email			Define equity, affordability (for the middle class and not just low-income), and the concept of rate fairness between rate classes.
103	SCA	9/16/24 SCA Caucus feedback transmitted by email			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. Including 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.
104	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.
105	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.

106	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.
107	SCA	9/16/24 SCA Caucus feedback transmitted by email			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.
108	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 <u>how the County will anticipate, engage with, and address</u> future nutrient permit requirements, regulations related to CECs such as PFAS, or other future regulatory changes?
109	SCA	9/16/24 SCA Caucus feedback transmitted by email	7	Capacity Demands	New question - <u>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.</u>
110	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, <u>and what are the cost implications?</u>
111	SCA	9/16/24 SCA Caucus feedback transmitted by email	7	Capacity Demands	Suggested edit to question 4 - How should I/I be managed <u>and how can costs be fairly apportioned?</u> How much of the additional projected flow is coming from I/I versus population growth? Should I/I policy change to <u>reduce support reducing</u> the capacity needed for I/I?
112	SCA	9/16/24 SCA Caucus feedback transmitted by email	7	Capacity Demands	New question - <u>What types of sewer cost allocation structures can incentivize I/I reduction?</u>
113	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.
114	SCA	9/16/24 SCA Caucus feedback transmitted by email	7	Capacity Demands	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.

115	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).
116	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?
117	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.
118	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.).
119	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?
120	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.
121	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.
122	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.
123	SCA	9/16/24 SCA Caucus feedback transmitted by email	7	Climate Change	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?

124	SCA	9/16/24 SCA Caucus feedback transmitted by email	7	Climate Change	New question - <u>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)?</u>
125	SCA	9/16/24 SCA Caucus feedback transmitted by email	7	Climate Change	New question - <u>How should WTD efforts support the water quality of Puget Sound and applicable inland waterways?</u>
126	SCA	9/16/24 SCA Caucus feedback transmitted by email	7	Climate Change	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.
127	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.
128	SCA	9/16/24 SCA Caucus feedback transmitted by email	8	Resource Recovery	New question - <u>How can the county best support environmental benefits while instituting safeguards to protect against environmental risks of contamination? How should cost considerations be weighed?</u>
129	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? <u>How does the ongoing rate methodology study inform this conversation?</u>
130	SCA	9/16/24 SCA Caucus feedback transmitted by email	8	Finance / Affordability	New question - <u>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.</u>
131	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.

132	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.
133	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.
134	SCA	9/16/24 SCA Caucus feedback transmitted by email	3	Challenges and Opportunities	A background or history of the system should be part of the update. At a minimum as the status of the system (who's in, how it's paid for, history of agreements), existing capacity, future projected need, and what's changed since the last RWSP that should be sufficient. This "system status" was missing from the scope.
135	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.
136	SCA	9/16/24 SCA Caucus feedback transmitted by email	4	Vision	We should set the "vision" much sooner in the process as it should inform the rest of the work. 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.
137	SCA	9/16/24 SCA Caucus feedback transmitted by email	4	Vision	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.
138	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.
139	SCA	9/16/24 SCA Caucus feedback transmitted by email	4	Capital Program Plan, EIS, and Policies	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.
140	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?

141	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).
142	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.
143	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”).