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		(i applicable)	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? 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? 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.	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		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. Need to start with the mission and vision first and identify constraints/restraints. 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. MWPAAC and RWQC have concerns around the vision effort running concurrent with the policy analysis	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 made. WTD will propose how we work with MWPAAC and the touchpoints along the way to integrate their thoughts.

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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.	
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		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	issue or a financial issue? Is fairness a better definition?	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	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				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	,	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			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	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	Organization Sewer Districts	9/5/24 Sewer District Policy Paper transmitted by email	No.	(if applicable)	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			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	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		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	_ ·	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		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 benefit (impacts to cyctom from according to my scattle underson).
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.	may evaluate benefits (impacts to system from accepting stormwater from Seattle under. 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.	
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	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	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	Source of	Page			WITD Response
#	Organization	comment	No.	(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		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	Source of	_	Policy Category	Comment	WTD Posnonco
88	Organization SCA	9/16/24 SCA Caucus feedback transmitted by email	No.	(if applicable)	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.	WTD Response 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		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.

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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
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.	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.

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17			7			Comment noted. I/I management is covered by the I/I question(s) under the Capacity
105	SCA	9/16/24 SCA Caucus feedback transmitted by	,	Climate Change	management)? What efforts are happening in the stormwater arena that need to be taken into consideration? How much effort should be devoted to	Demand policy category. The RWSP Update is focused on wastewater planning but will
		email			exploring whether there may be opportunities for synergy and collective action with stormwater (i.e., can we begin to break down the regulatory silos)?	
106	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>	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		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	_	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	, , , ,	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	Program Plan,	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 regiona engagement partner as suggested.