



KING COUNTY AUDITOR'S OFFICE

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Presentation of Clean Water Plan Strategies: Need for Increased Transparency around Costs, Risks, and Guiding Principles

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REGIONAL WATER QUALITY COMMITTEE

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Clean Water Plan

**WE
ARE
HERE**



Clean Water Plan

Groups of projects and programs OR single project or program



Summary of transparency issues

1. Regulatory outcomes impact options



2. Costs can be obscured by how projects are grouped in Actions



3. Guiding principles are unclear



Policy-maker consideration

- No recommendations
- Questions for consideration

Questions for policy-maker consideration:

Regulatory outcomes impact options

KEY REGULATORY AREAS:

- **Consent decree** dictates wet weather management timeline
- **Nutrient loading limits** likely to require large capital investments at regional treatment plants



Regulatory outcomes impact options

SCENARIO	Existing consent decree; no nitrogen limits issued	Modified consent decree; no nitrogen limits issued	Modified consent decree; nitrogen loading set at current levels	Existing consent decree; nitrogen loading set at current levels	Nitrogen loading set at 8mg/L equivalent	Nitrogen set at 3mg/L equivalent
STRATEGIES PROPOSED BY WTD	A	A	A	A	A	A
	B	B	B	B	B	B
	C	C	C	C	C	C
	D	D	D	D	D	D
	E	E	E	E	E	E



Regulatory outcomes impact options

SCENARIO	Existing consent decree; no nitrogen limits issued	Modified consent decree; no nitrogen limits issued	Modified consent decree; nitrogen loading set at current levels	Existing consent decree; nitrogen loading set at current levels	Nitrogen loading set at 8mg/L equivalent
STRATEGIES PROPOSED BY WTD	A	A	A	A	A
	B	B	B	B	B
	C	C	C	C	C
	D	D	D	D	D
	E	E	E	E	E

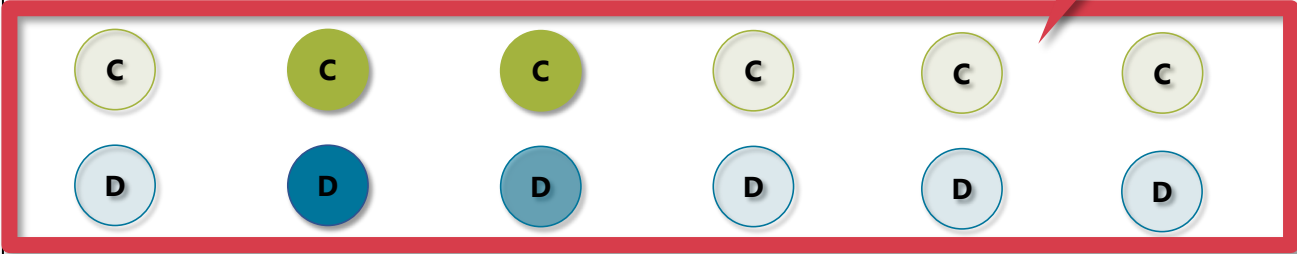
Strategies B through E assume an extended consent decree timeline of 2060



Regulatory outcomes impact options

SCENARIO	Existing consent decree; no nitrogen limits issued	Modified consent decree; no nitrogen limits issued	Modified consent decree; nitrogen loading set at current levels	Existing consent decree; nitrogen loading set at current levels	Nitrogen loading set at 8mg/L equivalent
STRATEGIES PROPOSED BY WTD	A	A	A	A	A
	B	B	B	B	B
	C	C	C	C	C
	D	D	D	D	D
	E	E	E	E	E

Changes to the Washington Administrative Code are required for Strategies C and D



Regulatory outcomes impact options

SCENARIO	Existing consent decree; no nitrogen limits issued	Most likely scenarios based on discussion with regulatory agencies			Existing consent decree; nitrogen loading set at current levels	Nitrogen loading set at 8mg/L equivalent	Nitrogen set at 3mg/L equivalent
	STRATEGIES PROPOSED BY WTD	A	A	A	A	A	A
	B	B	B	B	B	B	B
	C	C	C	C	C	C	C
	D	D	D	D	D	D	D
	E	E	E	E	E	E	E



Regulatory impacts

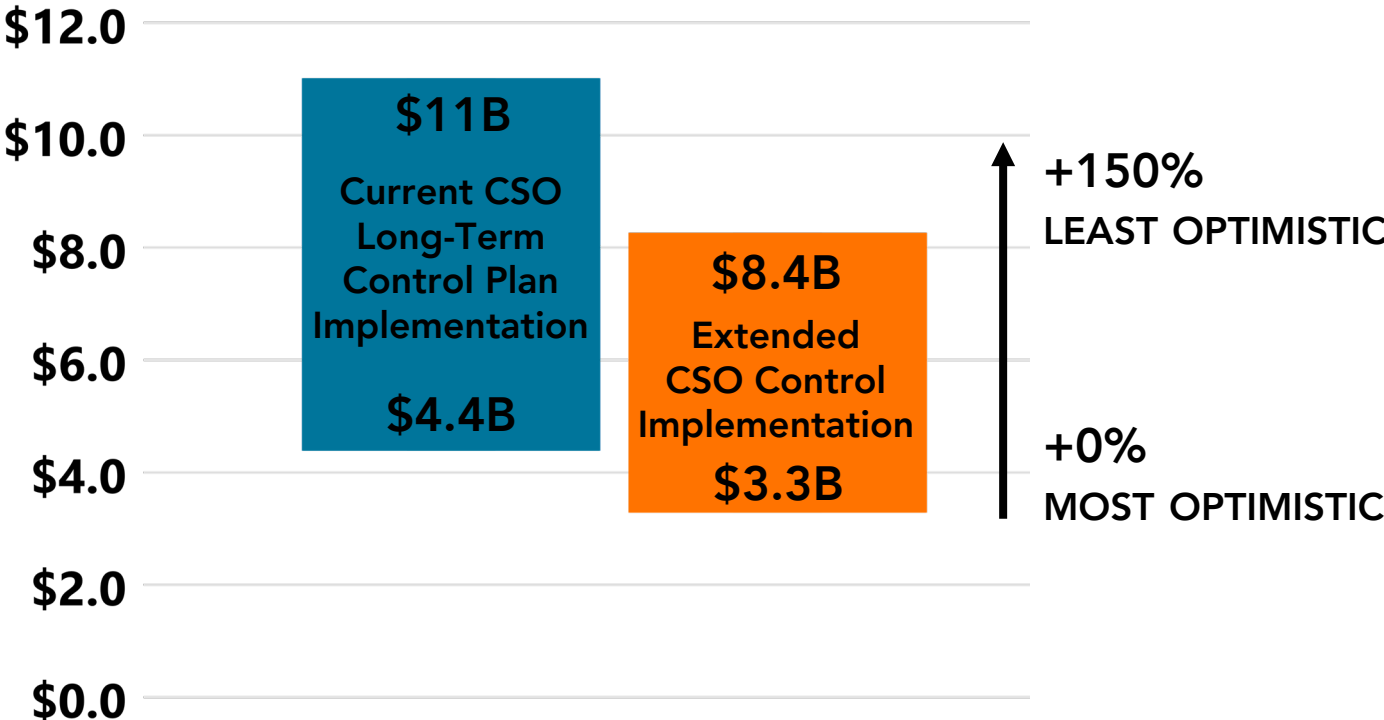
Questions for policy-maker consideration:

- What are the risks of an unsuccessful renegotiation of the consent decree, and what would be the impact on rates?
- What are the risks of not planning for implementation of nutrient removal, including how it might affect WTD's ability to serve new connections?
- What regulatory outcomes are required for each strategy, and/or action to be viable?
- Are there examples, and lessons learned, from other jurisdictions in the United States, where broad regulatory changes such as those proposed by WTD, were sought and achieved?



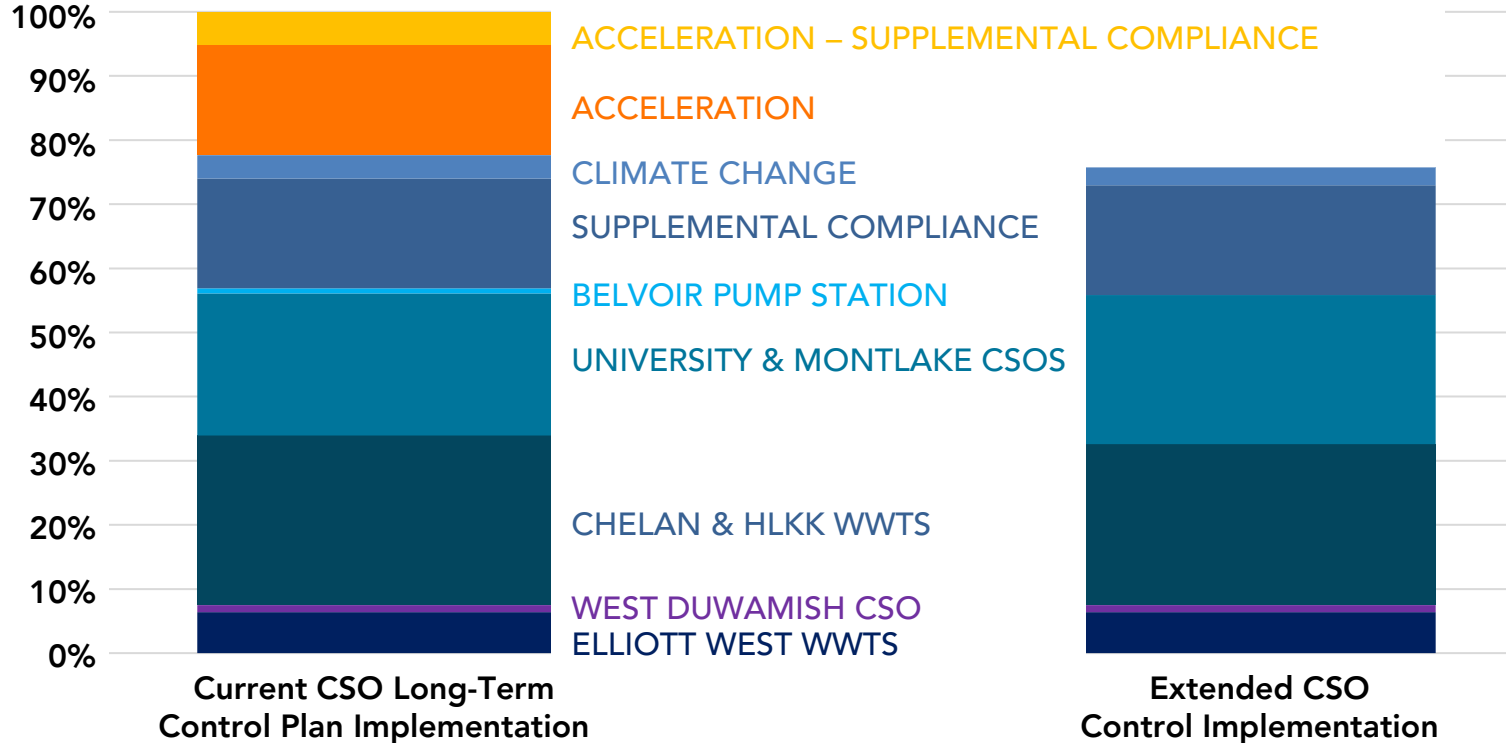
Grouping projects obscures costs

\$ BILLIONS



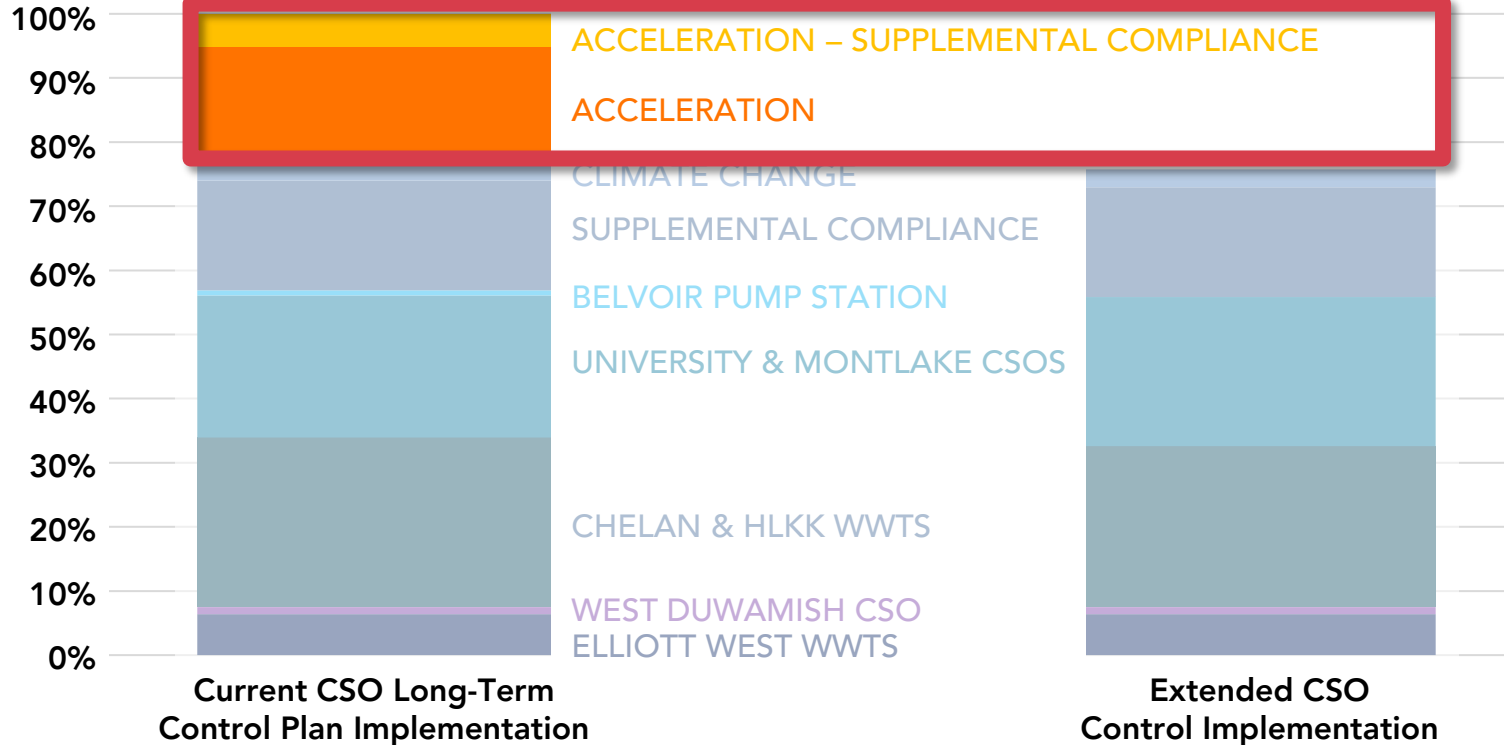
Grouping projects obscures costs

Conceptual Capital Cost as % of Current
CSO Long-Term Control Plan Implementation

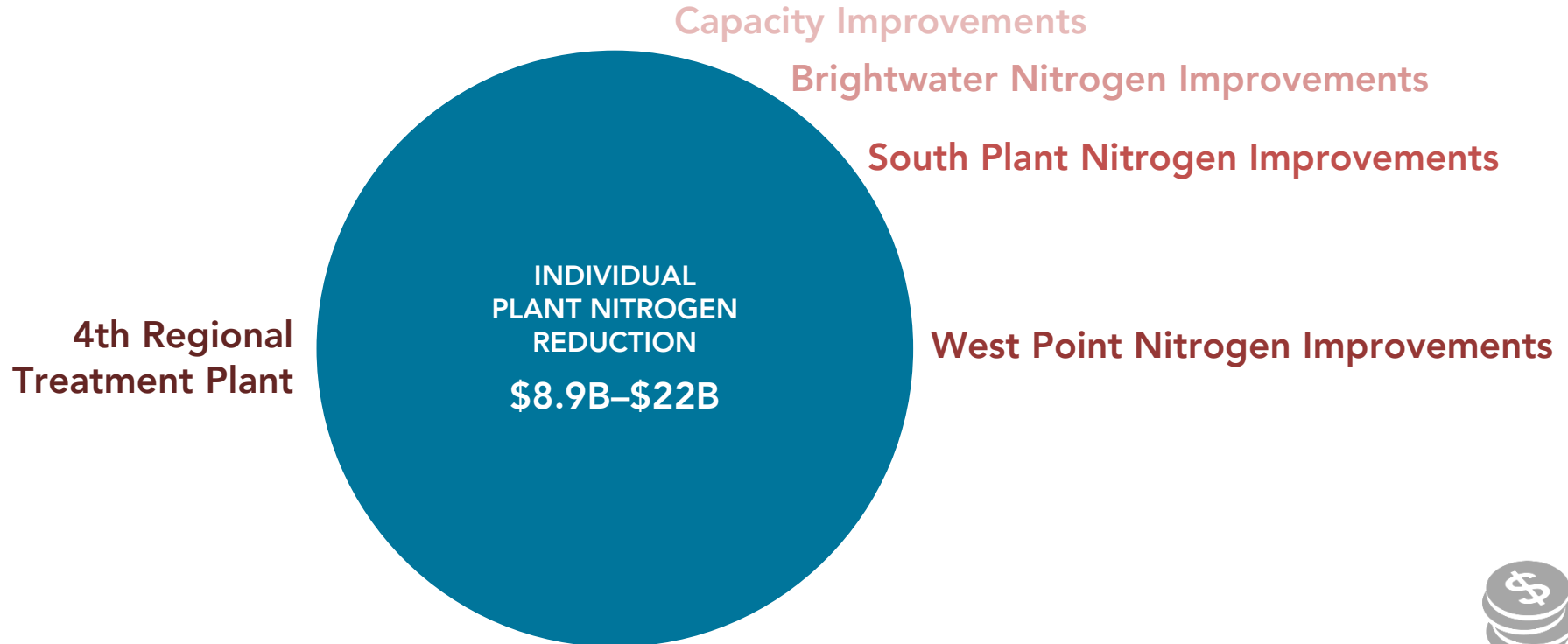


Grouping projects obscures costs

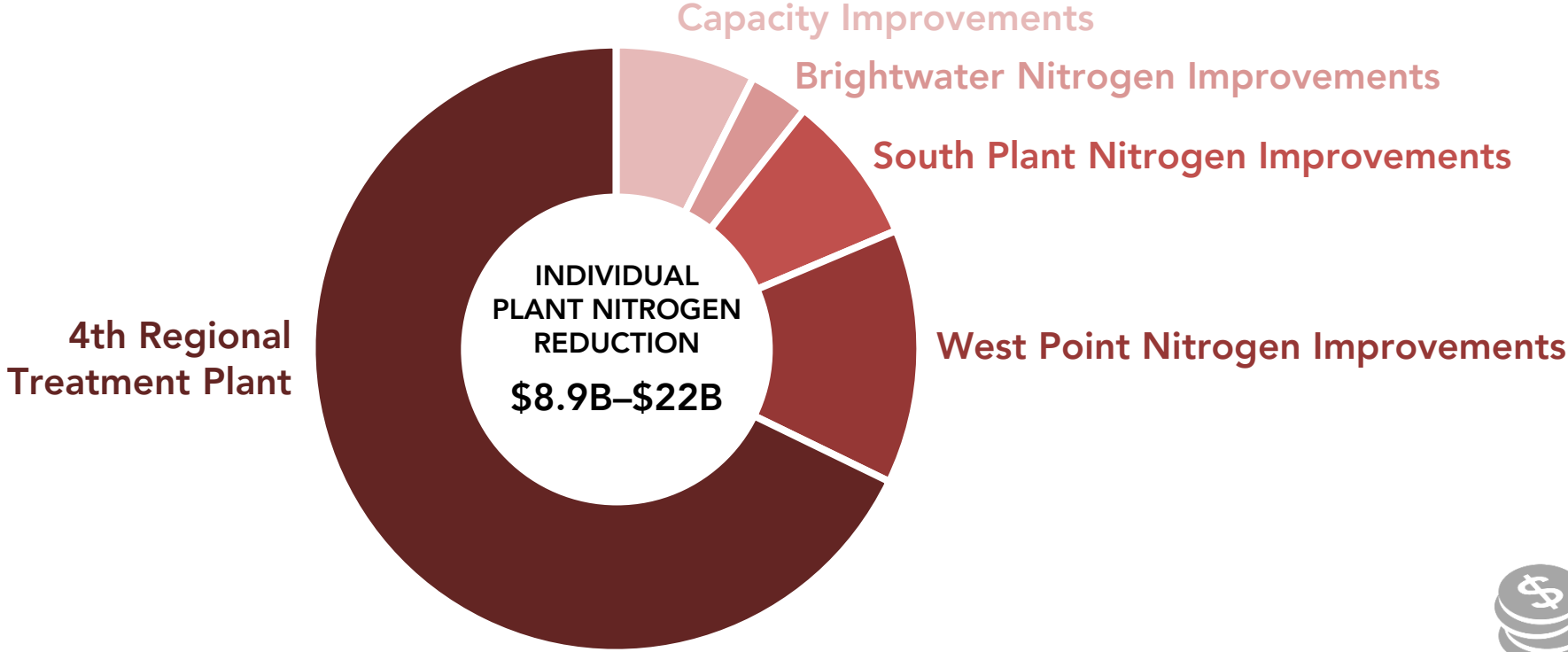
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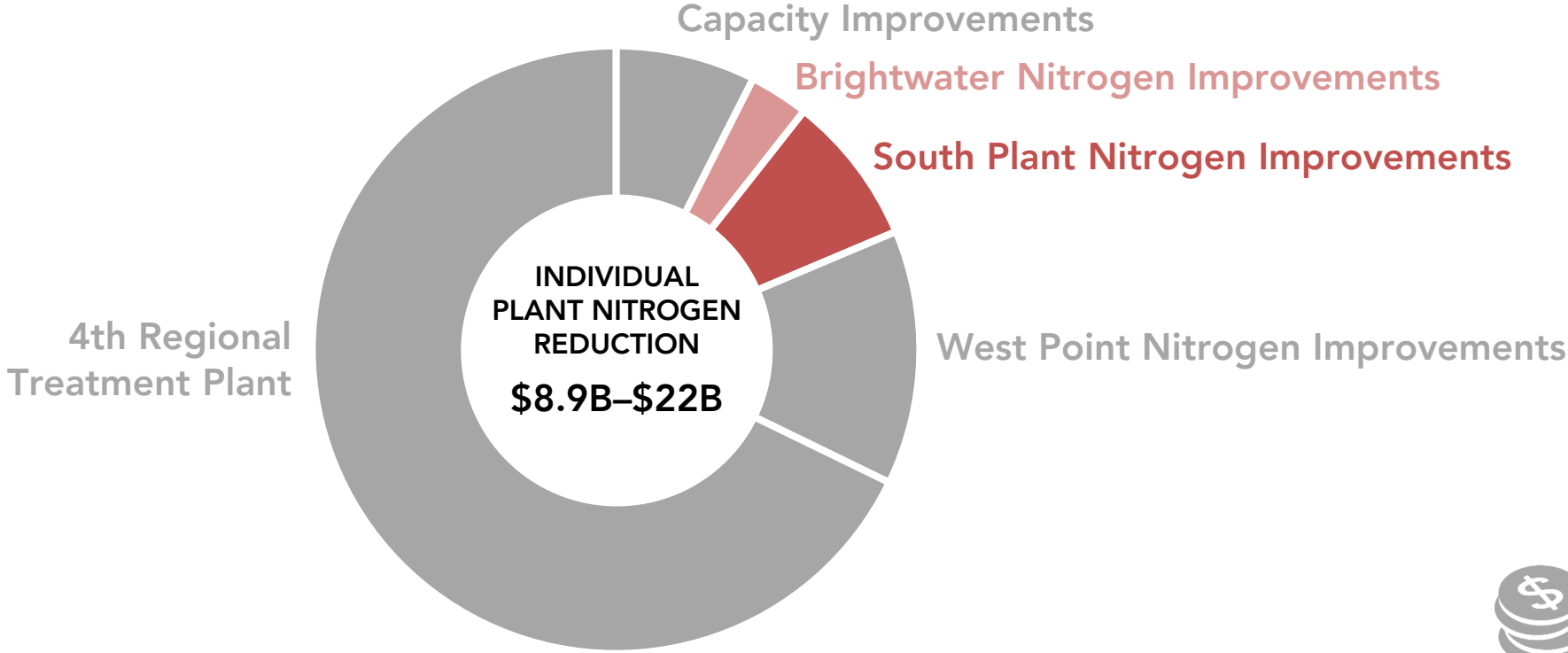
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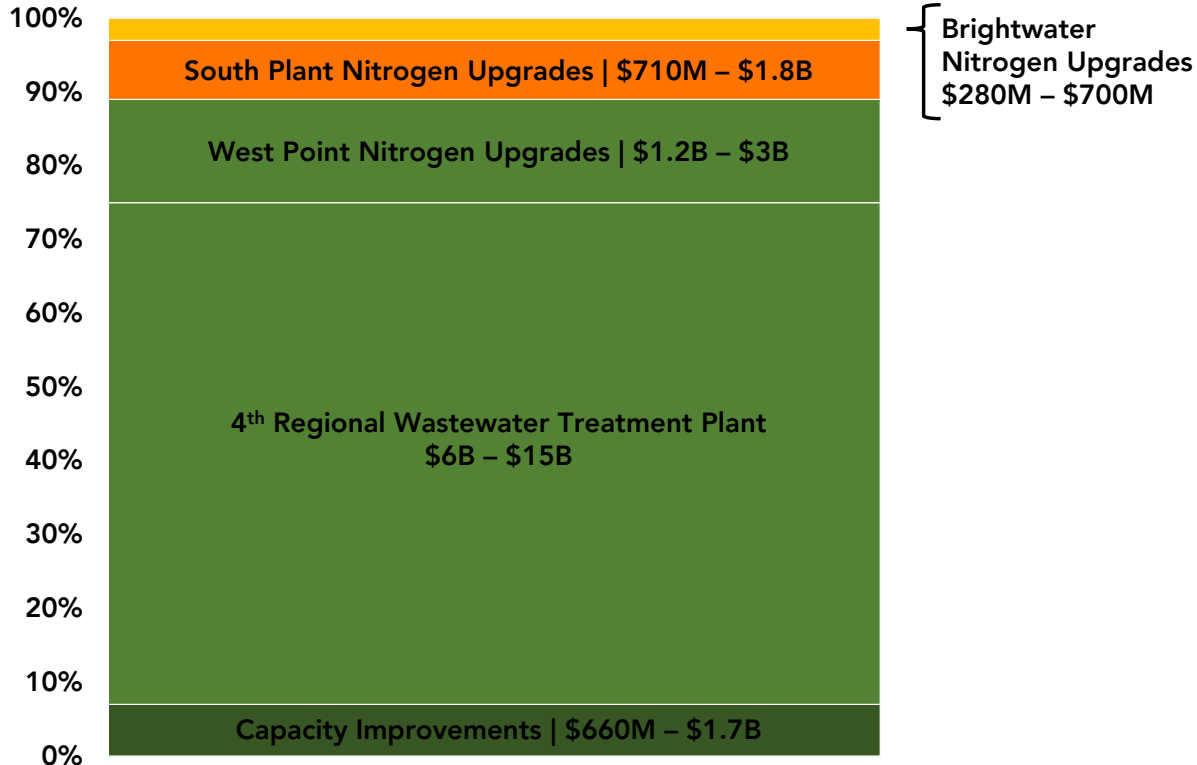
Grouping projects obscures costs



Grouping projects obscures costs



Grouping projects obscures costs



South Plant and Brightwater Upgrades

- 11% of total cost
- 43% reduction in nitrogen loading



Grouping projects obscures costs

Questions for policy-maker consideration:

- What are the costs of projects within individual Actions?
- Are there alternative ways projects could be grouped to improve outcomes at a lower cost?



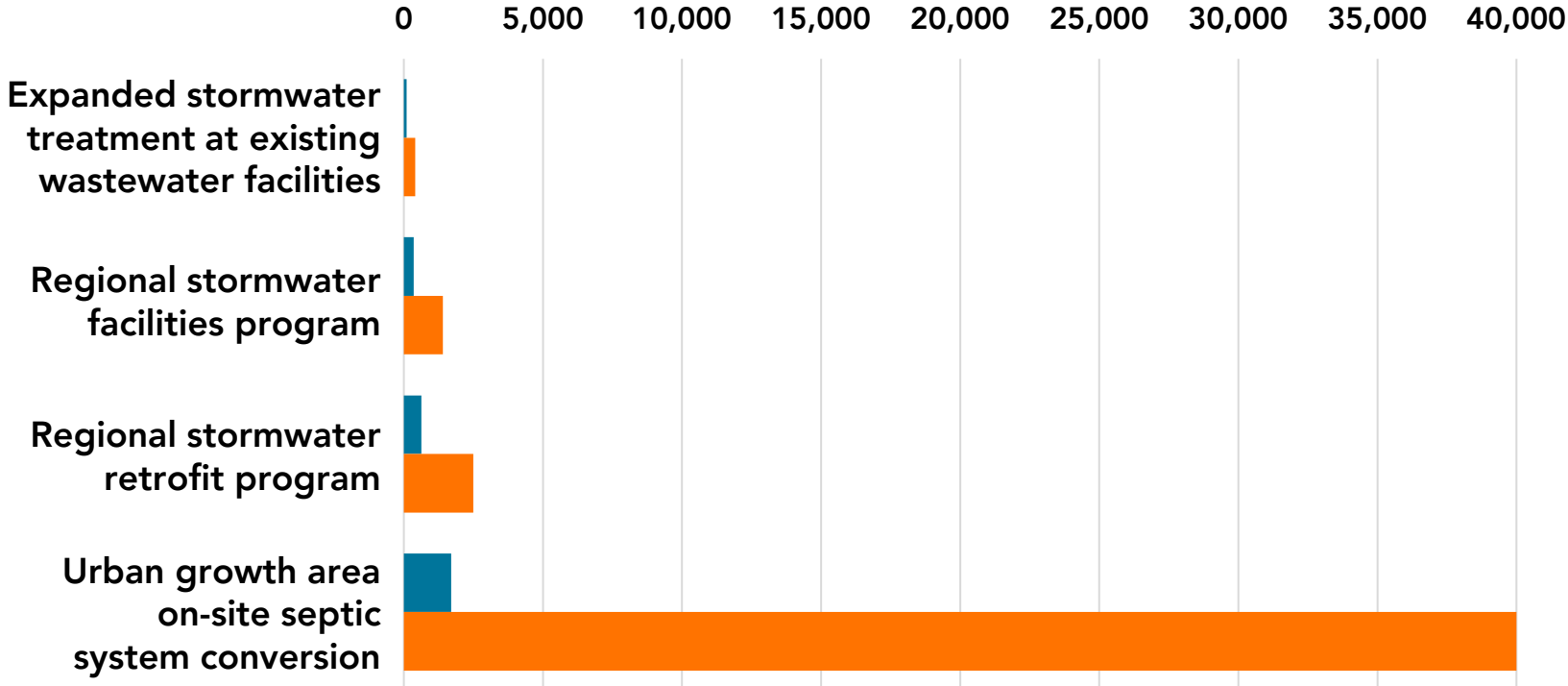
Guiding principles

- Best water quality outcome may be omitted
- Screening decisions can limit options



Guiding principles

Freshwater Phosphorus (lb/yr): **LOW** | **HIGH**



Guiding principles

Freshwater Phosphorus (lb/yr): **LOW** | **HIGH**

0 5,000 10,000 15,000 20,000 25,000 30,000 35,000 40,000

Expanded stormwater treatment at existing wastewater facilities



Regional stormwater facilities program



Regional stormwater retrofit program



Urban growth area on-site septic system conversion



Strategies B and D

Not present in any strategy



Guiding principles

Questions for policy-maker consideration:

- What are WTDs goals for the Clean Water Plan and how do those align with yours?
- To what extent did WTD consider water quality benefits in its development of Actions and strategies?



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Thank you

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[KingCounty.gov/Auditor](https://www.kingcounty.gov/Auditor)

Questions?