July 19, 2020

Katherine Fischer
katherine.fischer@kingcounty.gov
Environmental Programs Managing Supervisor
Wastewater Treatment Division (WTD)
Department of Natural Resources and Parks (DNRP)
King County
201 South Jackson St
Seattle, WA 98104-3855

Ms. Fischer,

Subject:

Please accept the comments herein from the Greater Maple Valley Unincorporated Area Council (GMVUAC). We are a community council of volunteer citizens who reside in the unincorporated portion (*i.e.*, outside the City of Maple Valley) of Tahoma School District # 409. The GMVUAC represents and advocates with King County, state officials, and other organizations for the interests of the citizens of our unincorporated area. We serve a population of 16,100 (2010 Census). Our service area is 116 sq mi. Residents of the Rural Area live in areas where they can embrace the natural environment as part of their daily lives. It is the intent of the GMVUAC to be the voices of those residents.

We have reviewed the Determination of Significance (DS) calling for a Programmatic Environmental Impact Statement (EIS) on the Clean Water Plan to revise/replace King County's Regional Wastewater Services Plan (RWSP). We have confined our comments to the Scope of that EIS. Ultimately, we advise the scope of the EIS address the human and environmental health impacts of the entire architecture of our wastewater-handling processes.

Description of Proposal

While we understand the necessity of long-term planning, forty years seems like a long time for a fast-growing area that presents so many variables not known and unknown. The eventual Clean Water Plan should contain clear administrative procedures that require periodic reviews to assess whether the plan is still valid and make necessary updates as appropriate, as well as a process review at least every 5 years with bi-annual status reports.

Issues

Regional Wastewater Treatment Plants

Scoping should look at alternative locations for building additional wastewater treatment plants. Unsafe or marginally safe practices for sludge (and the like) should be moved to areas better suited for complex chemical engineering processes (such as in the urban industrial areas themselves, and Eastern Washington), and a larger *"safety factor"* be built into our regional areas and systems that better anticipates the increased population growth that may likely occur within King County.

Scoping for additional Wastewater Treatment Plants should include assessment of urban and rural area growth plans with the impacts on residents and businesses within a 20-mile radius of potential sites.

Scoping on the site selection process should address present/future neighborhood impacts, wildlife habitat and population impacts, transportation studies, and a complete environmental analysis that includes air flow (stagnation), microclimate effects, and seismic stability.

Capacity in Regional Sewer Pipes and Pumps
Scoping needs to address specific sewage plant capacity, percentage of use, and their surplus abilities, as well as their strategy when the additional wastewater hits the maximum levels. Concerning overflow limits—*options such as the continuation of the wastewater conveyance system's current level of service (5% chance of overflow in any given year), a revised level of service (20% chance of overflow in any given year), aggressive infiltration and inflow (I/I) reduction and incentivizing self-directed I/I reduction, and conveyance system control optimization),* we recommend to not increase the amount of untreated wastewater, but rather to focus on the treatment plants that historically have been problematic. The scope should include regional sewage pipes from Maple Valley, Cedar Hill Regional Landfill, Cedar Grove Composting, and Queen City Farm (this should include both capacity and leakage). Please refer to the wastewater maps : https://www.kingcounty.gov/services/environment/wastewater/csi.aspx

Aging Sewer Systems, Natural Disasters, and Climate Change
We are encouraged the county is looking at Disaster planning; however, there are many facets of which that must be addressed. Scoping should include solid waste and organic solids *"healthy soils"* initiatives, as well as toxic springs outcroppings on the Cedar River Canyon Rim—specifically on the Cedar River Canyon Slopes below both the Cedar Hills Regional Landfill, Cedar Grove Compost, and Queen City Farms, as these water springs and streams affect the water quality of the Cedar River (and its salmon habitat) and present a *"creeping danger"* to the Cedar River Aquifer for the City of Renton and its drinking water sources. Scoping on the geology, hydrology, and soils should include, but not be limited to, mapped scarps, faults, surface disturbances, mines, quarries, and gravel pits.

Recycling Resources from Wastewater
Scoping should consider leachate processing—specifically removal of heavy metals and other toxic chemicals contained in leachate output from being carried into the municipal waste water system(s) to a specialized processing facility (preferably in an arid, barren, and solar rich landscape) where the materials can be dried, concentrated, and processed into useful products. Scoping also should address biosolids, fertilizer, compost, and recycled water processing and use (i.e. storage in a favorable location that is arid/dry, geologically stable, and located far away from human inhabitable locations) and assess system resiliency including management of ecosystems and reengineering scientific removal of toxic chemicals, pathogens (disease), aerosols and hydrocarbons (including polymers).

Stormwater and Combined Sewer Overflows (CSO)
Scoping should address the potential projects identified to increase the amount of stormwater treated or pollutants removed, including water quality trading concepts such as market-based incentives and pooling funding (each of these should be clearly defined and related impacts identified), as well as impacts to human and animal health and urban, rural, and natural

environments. Scoping should include the impacts of stormwater as it flows through ancient courses into wetlands, streams, creeks, rivers, and estuaries (ecosystems). Reference: https://bacwa.org/wp-content/uploads/2008/04/pulse-for-BACWA.pdf

Pollution Reduction Issues Preventing Pollution at the Source
Scoping should address the impacts from the many sources that exist today, as well as planned for the future. The Cedar Hills Regional Landfill receives roughly a million tons of garbage a year, hence it exports over a million gallons of leachate into the urban sewer system a day. This large and unique WTD customer is required to pre-process its leachate in expansive open-aeration ponds prior to pumping the processed liquid into the sewage system. The output, whether airborne (gas, dust, etc.), solid or liquid, should be reviewed for all known Volatile Organic Compounds (VOC's), not just the dozen or so King County has historically monitored. Scoping should include full chemical characterization of emitted VOC's and interactions to assess impacts on the health of residents who reside within a 100-mile radius of any Wastewater Treatment Plant site.

Pollution from Historical Activities
In general, we believe the statements in this section seem to be vague: *"WTD will explore options that include continuing current programs to clean up contaminants that have built up in sediments from past activities. More expansive programs to address legacy pollution, including projects in and adjacent to water bodies that remove pollutants and prioritize restoration of critical habitat will also be explored."* We call for the scoping to include all of this and in the depth necessary to truly assess individual impacts and cumulative impacts. We specifically are concerned about clean-up activities around the Queen City Farms Superfund site and Cedar Hills Regional Landfill. There already are decade's long deep histories with both of these sites regarding pollution that includes Cedar Grove Compost. Such impacts need to be better historically recognized and further testing required with continuous monitoring with modern science equipment.

Location of the Proposal
Scoping should not be limited to the urban growth areas. Most of the polluted waterways in King County originate in the Rural Area with both the Cedar River and Issaquah Creek with known toxins. It would seem logical to start clean-up activities at the furthest point sources (e.g., John Henry Mine, Reserve Silica, Queen City Farm (Superfund), Cedar Grove Compost, and Cedar Hills Regional Landfill) and move activities closer to the urban areas as pollution levels drop from the sources in the Rural Area.

Conclusion

The DS calling for a Programmatic EIS on the Clean Water Plan to revise/replace the County's RWSP omitted the Rural Area: "*The Plan covers the area served by WTD that includes the urban growth areas of King County and adjacent portions of south Snohomish County, and a small area of north Pierce County.*" As residents of King County, we believe the scoping must include the Rural Area and all related impacts due to the pollutants and contaminants generated from places like the Cedar Hills Landfill leachate treatment site and other sites located in the Rural Area.

It is important to Rural Area residents to feel included in activities that affect their personal and environmental health. Unfortunately, Rural Area residents *already* feel left out of decisions that

affect the County, as a whole; residents in urban and metropolitan areas have City officials and more County Councilmembers who pass ordinances and develop policies that can (and do) negatively affect citizens of the Rural Area.

In the spirit of *"think globally, act locally,"* we recommend scoping consider thinking internationally. King County has the opportunity to make an impact on our world's water sources and promote a *"healthy planet"* approach with its long-term Clean Water Plan that calls for better management and plans for scientific removal and gathering of toxic chemicals, pathogens (disease), aerosols and hydrocarbons that convert the substances into something that is scientifically safe (public and environmentally). Part of the scoping should call for the assessment of research performed on Clean Water Plans from across the nation, especially in those states and counties that border large bodies of water, like Puget Sound.

In addition, scoping should take into account the following similar directives:

- Washington State SB 6306 *"Soil Health Initiative"* Effective June 11, 2020
- King County Executive Order No. LUD-12-1-EO *"Clean Water Healthy Habitat Executive Order" Effective September 4, 2019*

It is expected all the corresponding government agencies will cooperate, coordinate, and respond with the same vision. We recommend considering the County's actions from a global perspective since most of our waterways in King, Pierce, and Snohomish counties drain into Puget Sound.

Approved by:

LarKen Buchanan
lmbuch@outlook.com
Chair, Environment Committee
GMVUAC

Steve Hiester
steve.Hiester@oldcastle.com
Chair
GMVUAC

cc: CleanWaterPlanSEPA@kingcounty.gov
John Taylor, Director Dept. of Local Services john.taylor@kingcounty.gov
Lauren Smith, Director, Regional Planning, KCEO lauren.smith@kingcounty.gov