April 19, 2018

Via e-mail to: leana@ci.stevenson.wa.us

Stevenson City Council
P.O. Box 371
Stevenson, WA 98648

Re: Comments on draft pretreatment ordinance

Dear City Council Members:

The Skamania Economic Development Council is submitting this comment letter to address concerns expressed by our local businesses regarding the draft pretreatment ordinance on the City Council agenda for April 19, 2018. The EDC participated in the April 13 meeting held by city staff to discuss the pretreatment ordinance and also met with Leana on April 18 to discuss some of these concerns.

The EDC has identified several items in the draft pretreatment ordinance that should be addressed or discussed further by City Council:

- Identify in the recitals the historical context for the new pretreatment ordinance – there are several factors that play into the need for a new ordinance and based on concerns from the businesses the city should clearly articulate those reasons. The EDC sees some of them as follows:
  - Identify existing pretreatment ordinance and why it is being repealed;
  - Clearly articulate that the city has made a determination that previous years’ limited review and analysis of pretreatment options has been detrimental to the sewer treatment plant and has exacerbated ongoing, existing capacity issues;
  - Identify DOE’s role in moving forward with the pretreatment ordinance and how it relates to the administrative order timeline;
Recognize that there are multiple efforts including: CSI, testing protocol evaluation, etc. that are ongoing and will further identify the specific issues and potential solutions and, if necessary, the city may adjust the pretreatment ordinance at a later date.

- Include language in the proposed ordinance that sets forth procedures for retrofitting existing users which potentially allows for individual contracting with the city in order to limit undue economic hardship on existing businesses (Leana identified some language included in the City of Washougal ordinance that could address this in her memo to City Council);

- Provide language that allows for an increased deadline to meet negotiated pretreatment standards particularly with existing users – this time period could be up to three years and seems to be an acceptable amount of time since it is included in other pretreatment ordinances, and again, addresses economic hardship and other factors;

- Add language allowing the City to modify the ordinance as necessary; and

- Provide language that identifies new and emerging technologies and the ability for the city to review and approve alternative, green technologies when addressing pretreatment options.

The above comments are specific to the draft ordinance before you, but below are some additional general comments.

As you all know, the businesses (along with the city) are working to identify proper testing protocols that will better identify their impact on the system. I would continue to urge the city to work with all businesses throughout the city, not just the businesses identified in Tetra-tech’s memorandum dated September 22, 2017 that triggered specific assumptions still being utilized to move forward with the treatment plant and rate structures even though it seems there is consensus that the data does not correlate with business activities.

That being said, the city is graciously working with the businesses and the Center for Sustainable Infrastructure to identify holistic, alternative options to assist with capacity issues (lowering the cost and size of the treatment plant) as well as opportunities for businesses (reduce costs by qualifying for lower tier in rate structure through best management practices and minimal pretreatment). This could be hugely beneficial for the city and the businesses from a cost standpoint as well as potentially showcase a healthy partnership between the public and private sector and thus showcase the City of Stevenson as well.

Please allow the city staff and our local businesses time and opportunity to identify alternatives (such as looking at pretreatment options at the plant) that could be much more valuable in the long run for our community than a $16 million treatment plant that no one wants especially if there are more cost effective and innovative solutions.

Thank you for your time.

Sincerely,

Kari R. Fagerness