



Metropolitan Wastewater MANAGEMENT COMMISSION



partners in wastewater management

MWMC Commission

March 03, 2023

Joe Pishioneri
Springfield City Councilor
MWMC President

Ken Helm, Chair
House Committee on Agriculture, Land Use, Natural Resources, and Water
Oregon State Legislature
900 Court St. NE
Salem, Oregon 97301

Bill Inge
Lane County Citizen
MWMC Vice President

Jennifer Yeh
Eugene City Councilor

Pat Farr
Lane County Commissioner

Subject: Support for HB 3231 - Relating to the development of resources to improve water reuse implementation in Oregon

Doug Keeler
Springfield Citizen

Dear Honorable Members of the House Committee on Agriculture, Land Use, Natural Resources, and Water:

Christopher Hazen
Eugene Citizen

The Metropolitan Wastewater Management Commission (MWMC) is writing in full support of HB 3231. Timely state action is needed to evolve Oregon’s regulatory framework so wastewater utilities can access an environmentally protective permitting path that is less onerous, costly, and complex, and that opens up a broader range of project opportunities. Now is the time for Oregon to expand opportunities for recycled water and beneficial land application projects as part of the solution to water, climate, and economic challenges. Other states have modernized their rules to better harness treated wastewater as a highly-valued resource. HB 3231 will require the Oregon Department of Environmental Quality (DEQ), in consultation with the Oregon Water Resources Department other stakeholders, to complete steps toward updating the state’s regulatory framework for beneficial reuse and other applications of treated wastewater.

Peter Ruffier
Eugene Citizen

Administration

Matt Stouder
MWMC Executive Officer
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The MWMC is the regional wastewater service partnership of the City of Eugene, the City of Springfield, and Lane County serving a population of over 250,000 – as such, we are one of the largest wastewater utilities in Oregon. The MWMC’s mission is to protect our community’s health and the environment by providing high-quality wastewater services to the Eugene-Springfield metropolitan area. In order to fulfill these obligations, the MWMC strives to be recognized as a leader in protecting water quality through sustainable and fiscally responsible practices.

Operations

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March 3, 2023

Page 2 of 2

Since 2004, the MWMC has been pursuing opportunities to develop recycled water use in our community beyond our own fence line. We have used recycled water for landscape irrigation at our regional treatment facility since the 1980s and expanded irrigation to our 400-acre Biocycle Farm in the 2000s, where we apply up to 90 million gallons of Class D recycled water per year to grow hybrid poplar trees as an environmental management tool that yields a sustainable supply of pulp and wood for industrial, and construction uses. Expanding this use in the community has proven difficult and slow to implement for several key reasons:

1. Recycled water is first and foremost regulated as a wastewater discharge by DEQ, as opposed to a water resource. Therefore, DEQ's mission is to focus on very conservative environmental protection measures as opposed to the water resource benefits of recycled water. In fact, the MWMC's recycled water use is characterized by DEQ as a "Type of Waste" on our discharge permit, despite MWMC's request to recharacterize the language prior to permit issuance.
2. The lack of advocacy for recycled water use by Oregon agencies fails to champion and seek recycled water uses for our communities. Not only is this at odds with other state goals, objectives, and executive orders, but this places the burden on wastewater utilities to promote recycled water use – a noble cause but problematic in our mission to clean wastewater in a cost-effective, efficient manner. The MWMC is pursuing recycled water because we understand it is the right thing to do. However, undue amounts of staff effort and resources need to be directed not just to producing a high-quality, reliable recycled water resource, but to advancing reuse in our communities.
3. The environmental benefits and possibilities of recycled water are ignored, discounted, or precluded from consideration in many applications. Protection of human health and the environment should always be at the forefront of any decision making and permitting process. However, siloed, and myopic approaches to recycled water programs ignore that recycled water can be (and is often) of higher water quality than the water body the rules aim to protect. Oregon is missing out on win-win opportunities to enhance and restore stream flows, wetlands, and groundwater as well as other green infrastructure assets.

The MWMC is on the cusp of advancing recycled water use in amazing ways for our community and as an example for other Oregon communities. We have the opportunity to supply our economically important sand and gravel industries with a sustainable water supply through times of drought, leaving river water instream where it provides critical ecosystem functions. Likewise, we can ensure our urban trees, parks, stormwater facilities, and other green infrastructure are irrigated without drinking water or river withdrawal use, providing urban cooling, fire resistance, and water quality benefits despite climatic conditions. Ideally, this resource could be used to replenish urban streams in summer, restore groundwater through wetlands, and establish water security for the century ahead.

Sincerely,



Matt Stouder

MWMC Executive Officer