



Metropolitan Wastewater MANAGEMENT COMMISSION



partners in wastewater management

February 7, 2025

MWMC Commission

Jennifer Yeh
Eugene City Councilor
MWMC President

Bill Inge
Lane County Citizen
MWMC Vice President

Pat Farr
Lane County Commissioner

Christopher Hazen
Eugene Citizen

Doug Keeler
Springfield Citizen

Peter Ruffier
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Representative Ken Helm, Co-Chair
Representative Mark Owens, Co-Chair
Committee Members
House Committee on Agricultural, Land Use, Natural Resources, and Water
Oregon State Legislature
900 Court St. NE
Salem, Oregon 97301

Sent electronically via OLS Portal

Subject: Support for HB 2169

Dear Co-Chairs and Committee Members:

The Metropolitan Wastewater Management Commission (MWMC) is writing in support of HB 2169. HB 2169 directs the Oregon Department of Environmental Quality (DEQ) to continue its efforts, started under previous legislation, to address regulatory barriers, develop technical assistance resources, and implement a coordinated state program to support new and expanded water reuse opportunities, in consultation with other state agencies, public wastewater utilities, and other stakeholders. Like many other public wastewater utilities, the MWMC looks for solutions to water quality challenges that provide the best fit in our community from water quality compliance, sustainability, and economic standpoints and that provide maximum benefits from public water infrastructure investments. The MWMC is dedicated to developing water reuse opportunities as part of its long-term integrated water management strategy. However, current regulatory policies implemented by both DEQ, and the Water Resources Department (WRD) make these opportunities burdensome, challenging, or impossible from the public benefit standpoints we adhere to as a wastewater utility.

HB 2169 is needed because Oregon's permitting requirements are decades old, and wastewater utilities have found the regulatory process to be difficult, and sometimes too complex and costly, to navigate. HB 2169 is also needed to effect improved coordination and collaboration among state agencies with the directive to implement Oregon-adopted policies encouraging and supporting the development of reuse projects. DEQ and WRD historically have not had the resources or a sufficient mandate to work to resolve these issues. This has deterred utilities from pursuing the types of water quality compliance projects that have multiple environmental, community, and economic benefits. At the same time, publicly owned treatment facilities face new or

increased permit requirements for things like temperature and nutrients – issues that can often be resolved through diverting effluent streams for recycled water uses.

The MWMC is a regional partnership between the City of Eugene, the City of Springfield, and Lane County with a growing service area population of over 275,000. As such, we are one of Oregon's largest wastewater treatment facilities. Our single, regional wastewater treatment facility treats, cleans, and discharges water back to the Willamette River at river mile 178 located just upriver of the confluence with the McKenzie River.

In 2004, consultants and regional managers identified development of recycled water uses as a strategic element of our 20-year facilities plan and water quality compliance program. Since that time, the MWMC has strived to identify the most effective, feasible, and beneficial uses of recycled water in our community. Through two decades of studies, planning efforts, partnering, and facilities design and financing, the MWMC is ready to launch a Class A recycled water program over the next 5 years. Along the way, we have encountered numerous challenges and obstacles in the regulatory process that have eliminated some potentially beneficial projects from further consideration. It does not need to be this way – with inter-agency coordination and resolve to promote and assist recycled water use, the burden can be alleviated from wastewater treatment facilities that can provide excellent sources of recycled water but are not geared or positioned to take on the role of policy advocate beyond our usual purview.

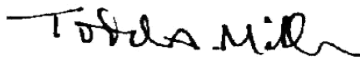
Our planning process resulted in the following outcomes:

- Identification of potentially significant uses of recycled water in the community with area partners.
- Stakeholder input and interviews including public officials, business interests, environmental organizations, and water resource agencies.
- Funding from WRD to conduct a feasibility study of recycled water use, specifically with industrial aggregate (sand & gravel) operations.
- Elimination of several project concepts for near-term implementation due to regulatory burdens, including wetland enhancement, irrigation supply through runoff channels, and large-scale rock crushing and processing.
- Identification of a significant, but “demonstration” use, Class A recycled water project to provide equipment washing and street tree irrigation to our industrial and parks partners.
- Landing on these uses as promising avenues to demonstrate recycled water benefits not only to the public, but to the regulatory agencies, to advance permitting of expanded uses to include rock crushing, discharge to settling ponds and wetlands, and irrigation of public parks.
- Recognition that for the public acceptance needed for successful expansion of use, we need the confidence and support conveyed by the regulatory agencies that they support the water quality benefits and responsible water resource management that recycled water provides.
- Local recognition is secured for the drought mitigation benefits of our project in our regional natural hazards mitigation plan and our local drinking water supplier's water conservation plan. We need this type of recognition at the state level, too.

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Now is the time for Oregon to expand recycled water and other beneficial land application opportunities as part of the solution to water, climate, and economic challenges. Other states have modernized their rules to harness treated wastewater as a highly valuable resource. Without passage of HB 2169 – a continued mandate and funding for DEQ and other state agencies to tackle the work – recent efforts to update Oregon’s recycled water regulatory framework and improve interagency coordination and collaboration cannot be sustained, and Oregonians will not be able to fully realize the resource recovery values that beneficial reuse projects have to offer. Please enact HB 2169.

Sincerely,

A handwritten signature in black ink that reads "Todd Miller". The signature is written in a cursive, slightly slanted style.

Todd Miller
Deputy Director
City of Springfield Oregon, Environmental Services Division