

**From:** [Nate Morgan](#)  
**To:** [jdougherty@g-o.com](mailto:jdougherty@g-o.com)  
**Cc:** [Andy Galuska](#)  
**Subject:** FW: Public Hearing #1 AB 22-02  
**Date:** Thursday, March 24, 2022 1:19:13 PM  
**Attachments:** [How to Dispose of Unused Medications flyer.doc](#)

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Jim

Below and attached is the response to Judy Heydrick for the SERP.

*Nate Morgan*

Public Works Director  
City of Sultan  
319 Main Street / PO Box 1199  
Sultan WA 98294-1199

**Hours: 6:30 AM -5:00 PM Monday -Thursday**

Office: 360-793-2262

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[nate.morgan@ci.sultan.wa.us](mailto:nate.morgan@ci.sultan.wa.us)

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**From:** Nate Morgan

**Sent:** Friday, March 11, 2022 11:57 AM

**To:** Tami Pevey <tami.pevey@ci.sultan.wa.us>; Judy Heydrick <judystan01@gmail.com>

**Cc:** Russell Wiita <Russell.Wiita@ci.sultan.wa.us>; Will Ibershof <will.ibershof@ci.sultan.wa.us>; Stephanie Aldrich <stephanie.aldrich@ci.sultan.wa.us>; Joe Neigel <joe.neigel@ci.sultan.wa.us>; Cory Dearborn <cory.dearborn@ci.sultan.wa.us>; Joseph Hund <joseph.hund@ci.sultan.wa.us>; Christina Sivewright <christina.sivewright@ci.sultan.wa.us>; Jeffrey Beeler <jeffrey.beeler@ci.sultan.wa.us>; Conner Morgan <conner.morgan@ci.sultan.wa.us>; Andy Galuska <andy.galuska@ci.sultan.wa.us>

**Subject:** RE: Public Hearing #1 AB 22-02

Judy,

First, I would like to apologize for taking so long to respond to your comments from the public hearing on January 27, 2022.

The U.S. Fish & Wildlife Service website indicates that the Oregon spotted frog is no longer found in

Snohomish County, largely due to habitat loss. This is the reason that the species was listed as unlikely to be adversely affected by the project.

The City's wastewater treatment plant will continue to meet the discharge criteria established by the Washington State Department of Ecology in the City's National Pollutant Discharge Elimination System (NPDES) permit to protect the water quality in the Skykomish River. With regard to pharmaceuticals, they are not regulated in wastewater treatment plant effluent by either the Environmental Protection Agency or the Washington State Department of Ecology. The study cited looked at the effect of pharmaceuticals at wastewater effluent concentrations of 50 and 100 percent, which is not representative of the receiving water conditions here where effluent dilution is significant. In addition, this project will include the construction of a second oxidation ditch. This will significantly increase both the hydraulic and solids retention times in the treatment process, which has generally been shown to lead to improved degradation and removal of pharmaceuticals.

Source control through public education is a common approach advocated by EPA and Ecology to reduce the discharge of pharmaceuticals to wastewater treatment plants by encouraging their proper disposal. To assist with public education, the City will be including a flyer in the upcoming monthly bills outlining the importance of properly disposing of pharmaceuticals and point out that there is a location within the city limits to properly dispose of pharmaceuticals at the police station. (flyer attached)

Thank you for your comments.

*Nate Morgan*

Public Works Director  
City of Sultan  
319 Main Street / PO Box 1199  
Sultan WA 98294-1199

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**From:** Tami Pevey <[tami.pevey@ci.sultan.wa.us](mailto:tami.pevey@ci.sultan.wa.us)>

**Sent:** Thursday, March 10, 2022 3:19 PM

**To:** Nate Morgan <[nate.morgan@ci.sultan.wa.us](mailto:nate.morgan@ci.sultan.wa.us)>

**Subject:** FW: Public Hearing #1 AB 22-02

Sincerely,  
*Tami Pevey*  
City Clerk  
City of Sultan  
319 Main Street, PO Box 1199, Sultan, WA 98294  
Phone: 360.793.1811  
Fax: 360.793.3344  
Email: [tami.pevey@ci.sultan.wa.us](mailto:tami.pevey@ci.sultan.wa.us)  
<https://ci.sultan.wa.us/>

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**From:** Judy Heydrick <[judystan01@gmail.com](mailto:judystan01@gmail.com)>  
**Sent:** Thursday, January 27, 2022 11:33 AM  
**To:** Tami Pevey <[tami.pevey@ci.sultan.wa.us](mailto:tami.pevey@ci.sultan.wa.us)>; Conner Morgan <[conner.morgan@ci.sultan.wa.us](mailto:conner.morgan@ci.sultan.wa.us)>; Stephanie Aldrich <[stephanie.aldrich@ci.sultan.wa.us](mailto:stephanie.aldrich@ci.sultan.wa.us)>; Cory Dearborn <[cory.dearborn@ci.sultan.wa.us](mailto:cory.dearborn@ci.sultan.wa.us)>; Joseph Hund <[joseph.hund@ci.sultan.wa.us](mailto:joseph.hund@ci.sultan.wa.us)>; Joe Neigel <[joe.neigel@ci.sultan.wa.us](mailto:joe.neigel@ci.sultan.wa.us)>; Christina Sivewright <[christina.sivewright@ci.sultan.wa.us](mailto:christina.sivewright@ci.sultan.wa.us)>; Jeffrey Beeler <[jeffrey.beeler@ci.sultan.wa.us](mailto:jeffrey.beeler@ci.sultan.wa.us)>; Russell Wiita <[Russell.Wiita@ci.sultan.wa.us](mailto:Russell.Wiita@ci.sultan.wa.us)>; Will Ibershof <[will.ibershof@ci.sultan.wa.us](mailto:will.ibershof@ci.sultan.wa.us)>; Andy Galuska <[andy.galuska@ci.sultan.wa.us](mailto:andy.galuska@ci.sultan.wa.us)>  
**Subject:** Public Hearing #1 AB 22-02

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Council, Mayor and Staff

Please include my comments in the record.

E-Page 12 of the Hearing packet informs that the city has completed a habitat assessment for the proposed WWTP upgrades to ensure the project would not adversely affect any of the Endangered species or any critical habitat. In particular, it is noted that the threatened Oregon Spotted Frog and Bull Trout are unlikely to be adversely affected by the project. How can additional wastewater discharge be unlikely to adversely impact these two ESA listed species? Note citations from several scientific studies;

The scientific journal **Eco Watch**, published May 16, 2016

"The Oregon spotted frog is 4 inches long and calls while under water. It is a highly aquatic frog and needs clean water and stable flows for egg-laying, tadpole development and adult overwintering. The species is threatened by loss of wetlands, poor river management that

forces artificial flows, reduced water quality, drought, invasive species and other threats. Worldwide, more than one-third of amphibian species are threatened with extinction. Amphibians have been on the planet for millions of years and when they start dying off it's a wakeup call that we need to take better care of our resources,"

### **Science Daily**

from research organizations-"Fish exposed to treated wastewater have altered behavior"

Date:

December 5, 2017

Source:

McMaster University

Summary:

Researchers have found that fish living downstream from a wastewater treatment plant showed changes to their normal behavior --- ones that made them vulnerable to predators -- - when exposed to elevated levels of antidepressant drugs in the water."

Many more scientific studies related to wastewater impacts on fish and amphibians are readily available on the net. What is the basis for the city's determination in light of the various scientific studies to the contrary?

Judy Heydrick