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October 21, 2019

Water Quality Permit Coordinator
Northwest Regional Office
State of Washington Department of Ecology
3190 160th Avenue SE
Bellevue, WA 98008-5452
(Submitted Electronically)

RE: Proposed Puget Sound Nutrient General Permit

Lakehaven Water and Sewer District is a special purpose district providing wastewater collection and treatment services to over 100,000 residents of Federal Way and surrounding communities. Most of the wastewater collected from our customers is treated at two District-owned Wastewater Treatment Plants that ultimately discharge to Puget Sound. A smaller portion of the wastewater we collect is conveyed to other local treatment facilities that also discharge to Puget Sound.

We share the Department of Ecology's concerns for the health of Puget Sound and our mission is to continue providing environmentally responsible sewer service to all our customers. While we are unclear what a proposed "Puget Sound Nutrient General Permit" will look like, we continue to believe that our current NPDES permits provide a significant measure of protection for Puget Sound. We also know that as we learn more about the interconnection between water quality and the vitality of aquatic life, there may be more required of us to achieve the optimal balance between the human and natural environments.

In this respect, we believe an independent, science-based work group needs to be formed to evaluate available research and modeling efforts. This, we believe, is necessary to inform affected parties and any regulatory processes on what data is known and unknown in terms of water quality and aquatic life interconnections. Given the vast extent of Puget Sound and the extremely complex biological processes within this ecosystem, it is reasonable to assume we do not currently know all we need to know to properly evaluate solutions. It follows that any plans for course correction should be carefully considered with a broad group of stakeholders. Any proposed plans should also be both incremental and proportional with our current scientific understanding of the problems and possible solutions and be flexible to adjust to new scientific information.

Other regions have undertaken collaborative planning approaches, such as has been done in the Chesapeake and San Francisco Bay areas. Given that any course correction will be expensive for the Puget Sound region, it is important to generate a clear vision of success and garner trust and understanding in any proposed remedial plan at the state and federal level in order to secure broader support for funding such a plan.

We look forward to further dialog with Ecology and other stakeholders in the Puget Sound region towards the shared goal of maintaining the health of Puget Sound.

Sincerely,

A handwritten signature in blue ink, appearing to read 'JB', with a long horizontal flourish extending to the right.

John Bowman
General Manager

cc: Board of Commissioners
John Barton
Ken Miller