



PUGET SOUND PARTNERSHIP

326 EAST D ST
TACOMA, WA 98421
P 360.464.1232 | INFO@PSP.WA.GOV

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Maia Bellon
Director
Washington State Department of Ecology
300 Desmond Drive SE
Lacey, WA 98503

Heather Bartlett
Water Quality Program Manager
Washington State Department of Ecology
300 Desmond Drive SE
Lacey, WA 98503

Maia Hoffman
General Permit Writer
Washington State Department of Ecology
300 Desmond Drive SE
Lacey, WA 98503

Re: *Agency comments on Ecology's Preliminary Determination to Develop a Puget Sound Nutrients General Permit proposal*

Dear Director Bellon, Ms. Bartlett, and Ms. Hoffman:

As the state agency leading our region's collective effort to restore and protect Puget Sound, the Puget Sound Partnership welcomes Ecology's proposal to develop a Puget Sound Nutrients General Permit. Continued dialogue with stakeholders and a commitment to collaborative implementation will be critical to ensure the success of the General Permit approach. As a backbone organization, we are committed to aligning the work of our partners around a shared vision and strategy to achieve the ecosystem recovery goals set for us by the Washington State legislature. The Partnership looks forward to assisting Ecology in facilitating dialogue and collaboration that reflects shared priorities and achieves shared goals.

While our understanding of specific cause and effect relationships between particular point sources of nutrients and Puget Sound health continues to evolve, the ecological mechanisms involved are relatively well understood. Excessive nutrient loading in Puget Sound precipitates deleterious eutrophication and depleted levels of dissolved oxygen. Low dissolved oxygen levels can harm salmon and other species of marine life. Nutrient pollution can also contribute to

acidification – which can prevent shellfish and other marine invertebrates from forming shells – and increases in macroalgae abundance, which can impair the health of eelgrass beds. These ecological disruptions exacerbate other stressors in an ecosystem already struggling to cope with a broad range of pressures, including climate change and rapid population growth. At the same time, we note that seasonal conditions also influence the relative significance of nutrient levels on dissolved oxygen in Puget Sound: cool temperatures and limited sunlight in the winter provide a natural check on algal productivity and other harmful consequences of nutrient pollution. The general permit should include a strong commitment to adaptive management to account for – and adjust to – these and other influences.

The Partnership has long recognized the threats posed by excessive nutrient loading. In 2011, the Leadership Council adopted a [resolution](#) calling for a 2020 ecosystem recovery target for dissolved oxygen in marine waters. [That target](#) became one of the key indicators of Marine Water Quality for our ongoing Puget Sound Vital Signs program. In explaining that indicator, we emphasized that human sources of nutrients have a significant impact on dissolved oxygen in multiple embayments in the South and Central Puget Sound, and that a combination of nutrient reductions from marine point sources and watershed sources will be needed to meet the indicator target. The Partnership reiterated that point in our [2018 Action Agenda](#), in which we noted that recovering Puget Sound will only be possible if our region collectively commits to significantly reducing nutrients and pathogens entering fresh and marine waters. To that end, the Action Agenda identifies over a dozen Near Term Actions – including scientific modeling, technological innovation, and policy-planning initiatives – designed to help address challenges associated with nutrient loading.

We are currently partnering with Ecology to develop an [Implementation Strategy](#) to address the human impacts on the amount of dissolved oxygen in marine waters. While still under development, the Marine Water Quality Implementation Strategy seeks to identify actions needed to reduce nutrient pollution. The proposed general permit may align well not only with that Implementation Strategy, but also with the recently published draft [Year Two Report and Recommendations](#) of Governor Inslee’s Southern Resident Orca Taskforce. In particular, the Partnership wishes to call Ecology’s attention to Recommendations 39-41. Recommendation 39 (“*Develop a National Pollutant Discharge Elimination System permit framework for advanced wastewater treatment in Puget Sound to reduce nutrients in wastewater discharges to Puget Sound by 2022*”) clearly reflects the objectives of Ecology’s proposed General Permit approach. However, the two subsequent Task Force recommendations emphasize the need to look for comprehensive, collaborative solutions. Recommendation 40 calls for partners to “*Better align existing nonpoint programs with nutrient reduction activities and explore new ways to achieve the necessary non-point-source nutrient reductions.*” Recommendation 41 reiterates the need to “*Collect high-quality nutrient data in watersheds to fill key knowledge gaps of baseline conditions.*” Together, these recommendations align with the Partnership’s strong contention that any successful effort to mitigate the adverse impacts of nutrient pollution will depend on science-based, adaptive management of the entire watershed.

The Partnership recognizes the importance of effective decision-making and collaboration. The General Permit approach should provide flexibility to optimize solutions at a scale commensurate with the problem. We understand that a General Permit would allow for more collaboration and innovation, as well as more efficient allocation of human resources dedicated

to permit development. Other significant estuary programs, including Long Island Sound and Chesapeake Bay, are successfully working towards nutrient management programs that include region-wide goals and the flexibility to achieve them efficiently and creatively through credit trading regimes.

We strive to promote accountability, effectiveness, and progress by ensuring smart investments through a shared, science-based system of measurement and monitoring. By itself, reducing nutrient pollution from point sources will not completely resolve issues of excessive nutrient loading in Puget Sound. Rather, a General Permit may be one important component of a broader, comprehensive watershed management approach that manages point and nonpoint sources of nutrients together. Leveraging federal, state, and local support for water infrastructure and wastewater treatment upgrades will be critical to efficient, effective, and early reductions in nutrient pollution in Puget Sound.

The Partnership strongly believes that realizing meaningful reductions in nutrient loading will require ongoing dialogue and collaboration with utilities and jurisdictions affected by a new general permit. Only through collective commitment can Puget Sound be effectively restored.

Sincerely,



Laura Blackmore
Executive Director

cc: Puget Sound Partnership Leadership Council Members