



October 21, 2019

Maia Hoffman
Water Quality Permit Coordinator
Department of Ecology
Northwest Regional Office
3190 160th Avenue SE
Bellevue, WA 98008-5452

RE: Ecology's Preliminary Determination - Puget Sound Nutrients General Permit for Nutrient Discharges from Domestic Wastewater Treatment Plants

Dear Ms. Hoffman:

The Jamestown S'Klallam Tribe (Tribe) has significant interest and investment in the health of Puget Sound. The harvest and consumption of fisheries resources is a treaty right and an essential part of our culture and economy. Nutrient pollution discharged fresh and marine waters:

- affects the availability treaty resources,
- affects the Tribe's access to fishery resources,
- results in violations of the State's water quality standards under the federal CWA,
- effects are compounded by climate change, population growth, and changes on land cover,
- require action now.
 - Actions are needed to reduce point discharges,
 - and actions are needed to reduce non-point sources.

The Tribe supports the concept of a general permit applied to all Puget Sound wastewater treatment plants to reduce nutrient discharges however, we have the following comments:

- The permit timeline needs to be aggressive,
- The flexibility provided within the general permit path needs to be quickly leveraged such that nutrient reductions can begin in earnest,
- Any pollutant trading mechanism developed within the permit should have sideboards that ensure that one area within the Sound is not scarified,
- Source control must be addressed to reduce nutrient loading into treatment facilities,
- The permit should also address other pollutants not currently treated for such as pharmaceuticals, pesticides, personal care products, etc.,
- Stakeholder need to work together to educate both state and federal legislators on the importance of clean water to the health of Puget Sound, to our salmon, to our orcas, and to the Health of our economy. State and Federal funding will be crucial to efficiently enacting the needed upgrades to

Additional background and detailed comments:

During the past two-years the Puget Sound Nutrient Source Reduction Project has apportioned the approximate loading from various nutrient sources. Approximately 50 percent is from direct discharges from wastewater treatment plants with the other 50% from all other upstream watershed sources. We commend Ecology for advancing a general permit for all wastewater treatment plants in Puget Sound. The Tribe supports the general permit in the expectation that it will provide flexibility and ensure rapid reduction of nutrient discharges. The proposed timeline for implementing the general permit is too slow. Ecology must implement an accelerated timeline. The time for action is now. In addition, Ecology must aggressively address nutrient source reduction both prior to entering wastewater treatment plants and from other watershed sources. The Puget Sound region continues to grow. Urban, suburban, and rural development continue to expand across the once forested landscape. We must continue to do more and more just to offset the effects of growth.

Water pollution is a significant factor limiting the Tribe's ability to exercise its treaty rights. Excessive nutrients are an ongoing water quality problem impacting the health, economics, and culture of the Tribe. We stand ready to work government to government with the State of Washington advance rapid and effective nutrient reduction to bring Puget Sound waters into compliance with state water quality standards and the Clean Water Act. Thank you for the opportunity to provide comment.

Sincerely,



Robert Knapp
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