



September 11, 2019

FROM:

Martha Kongsgaard, Chair, Marine Resources Advisory Council

RE: Support for the Puget Sound Nutrients General Permit

The Marine Resources Advisory Council (MRAC) <http://oainwa.org/mrac> thanks the Department of Ecology for the opportunity to comment on the proposed Puget Sound Nutrients General Permit. MRAC was established in 2013 to act as the state body dedicated to maintaining a sustainable and coordinated focus on ocean acidification by centering on the actions recommended in the 2012 Blue Ribbon Panel on OA's final report, *From Knowledge to Action* and our 2017 Addendum to that report. MRAC's membership includes legislative, executive, and elected officials, nongovernmental organizations, and private sector. Representatives from academic institutions and federal agencies have also been invited by the Governor to participate. MRAC has worked across organizational boundaries to ensure ocean acidification work is efficient, leveraged, and focused so that it becomes integrated into key programs across the state.

At the MRAC meeting on September 11, 2019, at the Kenneth K. Chew Conservation Hatchery, Department of Ecology's Dustin Bilhimer presented the proposed findings of the Nutrient Forum's work around nutrient reduction science and the results learned from other jurisdictions regarding the efficacy of nutrient general permits. At the conclusion of the presentation and discussion, a member of our council made a motion to send this comment letter to the Department of Ecology on behalf of MRAC **in strong support** of the proposal to reduce nutrients from WWTPs by issuing a nutrient general permit. We as a body unanimously make the following comments:

Research now suggests that local land-based contributions are a likely significant driver of marine conditions in some locations of Puget Sound. The 2017 Salish Sea Model demonstrates that while variability exists, overall, local nutrient sources significantly contribute to local ocean acidification conditions in certain areas of Puget Sound. This is an advancement in our understanding of what drives acidifying conditions at the local level. The 2012 Blue Ribbon Panel knew that the land-based nutrient and carbon reduction programs would be important in addressing ocean acidification, but it didn't know how significant local actions would be. The model provides new rationale for focusing on state and local nutrient and organic carbon control programs in the fight against ocean acidification. We encourage further scientific investigation and evaluation of model scenarios to continue to build our understanding and to guide decision-making regarding the suite of nutrient reduction strategies.

Chapter 5 of the original 2012 Blue Ribbon Panel report outlines the importance of reducing inputs of nutrients and organic carbon from local sources. Given the impacts of ocean acidification and the multiple benefits of nutrient and carbon source reduction, the Panel recommended enhanced actions to control and reduce local sources. To achieve this, the Panel set forth a two-tier approach for moving forward on nutrient and carbon reductions:

- The first tier (Strategy 5.1) constitutes a set of actions that build on existing programs to reduce nutrient and organic carbon inputs in ways that provide near-term economic and environmental benefits.
- The second tier (Strategy 5.2) recognizes that more stringent controls of nutrients and organic carbon pollutants will be required if additional data confirm that these inputs are contributing significantly to ocean acidification.

Reducing nutrients from WWTPs with a general permit would help implement these Blue Ribbon Panel recommendations. Yet, it is likely we will need to reduce nutrients from other sources as well.

With expected population growth in our state and climate change, we know stressors on marine chemistry will increase. We want to reiterate the strong and urgent need to move forward now. We strongly support the Department of Ecology's smart and forward-looking approach through a nutrient general permit. We would caution, however, that we also need to address nonpoint source contributions and develop meaningful reductions for these sources akin to the approach for point sources. As we witness declines in our ecosystem health, it is important to do what we can now to not just recover current health but to prepare for future changes. We stand with you and thank you.

Sincerely,
Martha Kongsgaard, Chair
On behalf of the Marine Resources Advisory Council