



HILARY S. FRANZ
COMMISSIONER OF PUBLIC LANDS
October 17, 2019

**DEPARTMENT OF
NATURAL RESOURCES**

AQUATIC RESOURCES DIVISION

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Kelly Ferron, Nutrient Forum Coordinator
Water Quality Program
Department of Ecology

SUBJECT: Proposed Nutrient Permit

Dear Ms. Ferron:

The Department of Natural Resources (DNR) appreciates the tremendous effort and focus that the Department of Ecology (DOE) has put into identifying solutions to the current problem of excessive nutrients in the Puget Sound. It is obvious that this is a long-standing issue that can be exacerbated by many influencing factors from the environment and by the public. In order to begin to correct the problem that we have caused in the Puget Sound, steps will need to be taken to reduce the amount of nutrients discharged by our collected wastewater and stormwater surface water discharge systems.

Establishing, implementing, and regulating an additional NPDES permit in any fashion is a monumental effort and requires many hours of dedicated work. DOE has done a remarkable job to engage the public, address concerns, and provide transparency in the stakeholder process. Although we know that issuing a General NPDES Permit for nutrients alone will not solve the nutrient problem in the Puget Sound, it is a huge step in the right direction. Tough decisions and actions need to be undertaken and DOE is being responsive to the call. We look forward to the evolution of permitting under this principle; while general permits are a great start, DNR believes that creating unique nutrient effluent limits specific to each WWTP may be required in the future to be able to continue measuring success.

As the steward of state-owned aquatic lands and the resources located on or attached to them, DNR is very concerned about anthropogenic nutrient discharges to surface waters. Numerous studies have shown that the excessive discharge of nutrients into Puget Sound damages natural resources on or attached to our state-owned aquatic lands. Excessive inputs of nutrients and organic matter lower water quality and change competitive interactions between different types of marine vegetation, leading to localized declines in eelgrass and kelp. Eelgrass beds are particularly vulnerable to light limitation due to overgrowth associated with higher nutrient loads. Lower dissolved oxygen concentrations in the water column change biogeochemical processes at the sediment water interface and impact benthic infauna in the bedlands. Increased nitrogen, organic carbon, and other pollutants from regional anthropogenic nutrient sources also contribute to ocean acidification and hypoxia that affects shellfish populations throughout Puget

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Sound. These impacts will become more severe with the expected population growth and climate change over the next decades.

DNR supports DOE in developing a NPDES General Permit for reducing nutrient discharges from wastewater treatment plants that discharge to the Puget Sound.

If you have questions or want to share additional information, please contact Ms. Abby Barnes at 360-902-1713 or via email at abby.barnes@dnr.wa.gov. She will be happy to assist you.

Sincerely,



Kristin Swenddal, Manager
Aquatic Resources Division

c: Abby Barnes, Supervisor, Sediment Quality Program