



State of Washington  
DEPARTMENT OF FISH AND WILDLIFE

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Main Office Location: Natural Resources Building, 1111 Washington Street SE, Olympia, WA

October 16, 2019

Department of Ecology  
Northwest Regional Office  
Attn: Water Quality Permit Coordinator  
3190 160<sup>th</sup> Avenue SE  
Bellevue, WA 98008-5452

Dear Water Quality Permit Coordinator:

Thank you for the opportunity to provide comments on the Department of Ecology's (Ecology) proposal to write a general permit to address and control nutrient discharges from domestic wastewater treatment plants that discharge to Puget Sound. The Department of Fish and Wildlife (WDFW) would like to voice our support for development of a general permit or inclusion of nutrient control requirements in individual permits for these treatment plants.

Nutrient pollution studies performed by Ecology through the Puget Sound Nutrient Source Reduction Project and Salish Sea Model results illustrate the need to manage excessive nutrients found in rivers and from point sources flowing into Puget Sound. Based on Ecology's study results, excess nutrients are negatively affecting water quality, and impacting the fish and wildlife species that require clean and healthy waters to thrive. These effects can impact our agency's ability to preserve, protect, and ultimately manage fish and wildlife resources in the following ways:

- Excessive nutrients can reduce dissolved oxygen levels in the water causing marine organisms to become lethargic and can affect their ability to locate food, avoid predators, and survive.
- Large nutrient inputs stimulate algal blooms and plant growth ultimately leading to depletion of oxygen in water and conditions that can kill aquatic animals.
- Human sources of nutrients from wastewater treatment plants exacerbate low dissolved oxygen conditions, particularly during hot summer months when marine and estuarine organisms may be affected by other environmental stressors such as temperature and low freshwater flows.

Removal and control of nutrients in our marine and estuarine waters aligns with WDFW's habitat conservation and recovery goals. We appreciate the opportunity to advance a

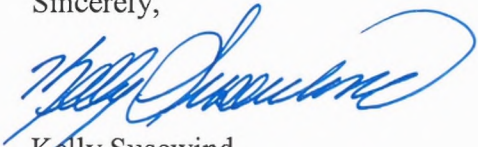
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recommendation for the development of a general permit for nutrient reduction and control, which supports our mutual mission of protecting, preserving and perpetuating healthy and sustainable fish, wildlife and ecosystems for current and future generations.

If you have questions related to the future development of a general permit for nutrient reduction and control, please contact Jennifer Griffiths at (360) 706-4302.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kelly Susewind", with a large, sweeping flourish at the end.

Kelly Susewind  
Director