

# LOTT Clean Water Alliance

Please see the attached file

## Department of Ecology Proposed General Permit for Puget Sound Comments from LOTT Clean Water Alliance

1. Is a general permit an appropriate tool to control and reduce nutrients in discharges from WWTPs to Puget Sound?
  - a. Yes, LOTT believes a general permit is an appropriate tool to address nutrient discharges from WWTPs to Puget Sound. A general permit would provide a path forward to establish a strategy for reducing WWTP nutrient discharges and a framework for constructively engaging WWTP dischargers and the public in the process.
  - b. From information presented at the August 7 Nutrient Forum, it is our understanding that Ecology is proposing a stepwise approach over several permit cycles to incrementally transition from general monitoring and planning requirements to more specific numeric limits on nutrient discharges. This approach seems reasonable, as it would allow for collaborative engagement with stakeholders and acknowledge that major changes to treatment processes take time.
  - c. This approach clarifies the process to be followed and establishes a timeline, both of which help reduce the sense of uncertainty WWTPs have felt since the onset of the Puget Sound Nutrient Source Reduction effort.
  - d. This process also accounts for issues of equity across WWTPs, as it is our understanding that a cap on nutrients would be applied across the general permit. We recognize that nutrient discharge limits in existing individual permits are likely to remain in effect where they are more stringent than those established in the general permit, but this approach could eventually require all WWTPs to meet at least minimum nutrient removal standards.
  
2. Other information relevant to WWTPs and Puget Sound water quality:
  - a. LOTT's ratepayers invested millions of dollars to add nutrient removal to our process at the Budd Inlet Treatment Plant (BITP) in the early 1990s. We operate under the most stringent nutrient discharge limits of any WWTP on Puget Sound. While it is challenging to meet these stringent discharge limits, it is necessary to protect our shared water resources.
  - b. To our knowledge, Budd Inlet is the only marine water in the Puget Sound basin currently subject to an active TMDL process. Of the four sources of nutrient loading to Budd Inlet, the BITP contributes roughly 3%, while external sources (treatment plants and nonpoint sources to the north of Budd Inlet) contribute 20% of the loading. It is likely that LOTT's discharge limits will be further reduced as a result of the TMDL. Our Board of Directors and ratepayers have serious concerns about equity, and are encouraged that this general permit process provides a means of addressing nutrient loading to Budd Inlet from external sources.
  - c. LOTT is also encouraged that the general permit process may provide a foundation for a state-level water quality trading/credit program. This would provide motivation and incentive for continued investment in water quality improvements to the benefit of Puget Sound water quality.
  - d. Design, construction, and operation of nutrient removal treatment processes is costly. It is our hope that the general permit process will also include access to a substantial pool of state and federal funding to support the cost of related treatment process improvements.
  - e. Nonpoint sources are a key factor in excess nutrient levels in Puget Sound, and must also be addressed through a state-level source reduction effort.