



STATE OF WASHINGTON

DEPARTMENT OF COMMERCE

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March 11, 2021

Eleanor Ott, P.E.
Washington State Department of Ecology
PO Box 47696
Olympia, WA 98504-7696

RE: Puget Sound Nutrient General Permit Preliminary Draft

Dear Ms. Ott:

Thank you for including Commerce-Growth Management Services in this general permit process. As summarized at the November 3, 2020, Nutrient Forum, Commerce supports Ecology in the ongoing efforts to improve the water quality of the Puget Sound, the greater Salish Sea, and upstream habitats, while achieving the goals of the Growth Management Act. Commerce will continue to work with Ecology, affected WWTPs, tribes, and other stakeholders, to further these objectives.

The general permit is necessary to address point-source nutrient discharges and removal. Commerce understands steps must be taken during the first permit term towards future nutrient loading reductions that will meet numeric water quality standards. And, we especially like the following:

- Ecology's flexibility and incentives approach for communities to address nutrients collaboratively to encourage outside of the box solutions
- Calculating action load options and alternatives based on facilities discharging less than 10mg/L TIN
- The future Regional Study for Nutrient Reduction Evaluation and future Regional Collaboration for Technology Exploration

As we continue this nutrient reduction work, Commerce is available for technical assistance. For example, concerns have been raised regarding nutrient reduction requirements and the potential impact on growth capacity. The Puget Sound region is growing rapidly, as noted in the Advisory Committee's Recommendations. The affected jurisdictions should work with comprehensive land use planning timelines, consider OFM projections, evaluate the growth patterns, and capital facilities improvement and capacity plans for accommodating new growth, while planning for or financing any necessary plant upgrades as a result of this GP.

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Congratulations to you and your staff for the good work this nutrient reduction general permit represents. If you have any questions or concerns about our comments or any other growth management issues, please contact Valerie Smith, Senior Planner-Growth Management Services, at 360.259.0487. We extend our continued support to our partner state agencies, tribes, jurisdictions, and stakeholders in achieving the goals of growth management.

Sincerely,

A handwritten signature in black ink, appearing to be 'V. Smith', followed by a long horizontal line extending to the right.

Valerie Smith, AICP
Senior Planner
Growth Management Services

Vs:lw

cc: David Andersen, AICP, Managing Director, Growth Management Services
Steve Roberge, Deputy Managing Director, Growth Management Services
Ben Serr, AICP, Eastern Region Manager, Growth Management Services
Abby Barnes, WDNR, PSNGP Advisory Committee State Caucus Chair