



**STATE OF WASHINGTON
DEPARTMENT OF HEALTH**

OFFICE OF ENVIRONMENTAL HEALTH AND SAFETY

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March 12, 2021

Eleanor Ott, P.E.
Department of Ecology
300 Desmond Drive
Post Office Box 47600
Lacey, Washington 98504-7600

RE: Draft Puget Sound Nutrient General Permit

Dear Ms. Ott:

The Department of Health is writing this letter in support of the draft Puget Sound Nutrient General Permit (PSNGP) to limit the impacts of excess nutrients in Puget Sound. The draft general permit aligns with our mission to improve the health of people in Washington State by preventing and reducing exposure to health hazards in the environment.

It is known that excess nutrients can lead to low dissolved oxygen (DO) in the marine waters of Puget Sound, which impacts the health of aquatic life. Ocean acidification, changes in the food chain, increased nuisance and harmful algal blooms are additional impacts of excess nutrients. Wastewater Treatment Plants (WWTP) deliver 81% of dissolved inorganic nitrogen loads to Puget Sound during the summer months and future population growth in the area, a projected increase of 1.5 million by 2050, will undoubtedly increase these loads if no actions are taken to reduce nutrient sources.

Ecology has projected that if the PSNGP is fully implemented, the portion of Puget Sound not meeting the DO standard would be halved. The expected reduction in harmful algal blooms would result in increased access to commercial and recreational shellfish harvest. In addition, implementation of advanced treatment for nutrient removal is expected to have concurrent benefits in incremental reductions in discharge of a number of contaminants of concern, as well as a reduction in pathogenic microbes prior to disinfection (one of the criteria for sizing of areas prohibited for shellfish harvest around wastewater outfalls).

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Department of Ecology
March 9, 2021
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Thank you for the opportunity to comment on the draft PSNGP. Please contact Mark Toy at Mark.Toy@doh.wa.gov with any questions regarding this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "T. Phillips". The signature is written in a cursive style with a large initial "T" and "P".

Todd Phillips, R.S.
Office Director

cc: Lauren Jenks, EPH Assistant Secretary
Joe Laxson, EPH Policy Director