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March 12, 2021

Eleanor Ott, PSNGP Permit Writer
Department of Ecology
Water Quality Program
PO Box 47600
Olympia, WA 98504-7600

RE: Puget Sound Nutrient General Permit Comments

Dear Ms. Ott:

Thank you for the opportunity to provide comments on the proposed Puget Sound Nitrogen General Permit (GP) related to waste load allocation for point source discharges in the State of Washington, with the goal being to achieve higher water quality standards for dissolved oxygen in Puget Sound. The ability to interact and enjoy the bounty of our natural resources requires good water quality achieved by reducing nitrogen inputs to these waters. Regulators, over recent decades, have placed increased scrutiny on nutrient pollution in watersheds throughout the United States. Though nutrients like nitrogen and phosphorous are naturally occurring and necessary to sustain healthy aquatic, estuarine, and marine ecosystems, the District realizes that in overabundance, they can interfere with that health by impairing biodiversity.

Lakehaven Water and Sewer District recognizes Ecology's responsibility to maintain compliance with water quality standards and to address dissolved oxygen (DO) impairment in Puget Sound. The District, however, is concerned about the impacts of implementing new regulatory requirements on the current timeline. Lakehaven supports the timelines proposed by the utility caucus which provide more time for informative science and for fully exploring the effectiveness and costs of nutrient removal technologies.

As Ecology has noted, each facility is a unique combination of treatment processes, and each utility is a unique combination of financial circumstances. Therefore, it may not be possible to try and define a universal financial reference point for all utilities. Puget Sound wastewater utilities are all responsible for a variety of financial drivers, such as compliance requirements, as well as sustaining the asset value of the collection systems, treatment facilities, biosolids management programs etc., and consequently all have different financial circumstances, user charge structures, and financing plans.

We also support other potential compliance options such as bubble permits or a regional water quality trading program, especially for utilities such as ours, who have multiple facilities each with its own unique nutrient discharge.