

## RE Sources

Please see attached letter.



2309 Meridian St  
Bellingham, WA 98225  
(360) 733-8307  
[re-sources.org](http://re-sources.org)

To: Eleanor Ott  
Nutrient General Permit Lead  
Washington State Department of Ecology  
PO Box 47696  
Olympia, WA 98504-7696

Transmitted Via eComment Form: <http://wq.ecology.commentinput.com/?id=aiK7u>

15 March 2021

**RE: Preliminary Draft of Puget Sound Nutrient General Permit**

Dear Ms. Ott,

Thank you for taking the time to consider our comment on the Preliminary Draft of Puget Sound Nutrient General Permit. We strongly support the need to both regulate and reduce the amount of nutrients that are discharged into our local waterways.

RE Sources is a non-profit organization located in northwest Washington and founded in 1982. We work to protect the health of northwest Washington's people and ecosystems through the application of science, education, advocacy, and action. Our priority programs include Protecting the Salish Sea, Freshwater Restoration, Climate Action, and Fighting Pollution—all critical issues affecting our region. Our North Sound Baykeeper is also a member of the Waterkeeper Alliance, with over 300 organizations in 34 countries around the world that promote fishable, swimmable, drinkable water. RE Sources has thousands of supporters in Whatcom, Skagit, and San Juan counties, and we submit these comments on their behalf.

As mentioned in the permit, the Salish Sea Model shows that chronic excess nutrient input into the Salish Sea is contributing to eutrophication and hypoxia which is negatively impacting our native flora and fauna both in abundance and species composition.<sup>1</sup> This nutrient stress is causing eelgrass beds to decline, fish to suffocate, jellies to overpopulate, and algae to bloom. Wastewater treatment plants are the largest local source of nitrogen<sup>1</sup>, therefore, it is logical to regulate the nutrient discharges from these facilities immediately.

We understand the rationale for limiting the initial permit to include only wastewater treatment plants that directly discharge into marine waters, but we strongly encourage increasing this coverage to all wastewater treatment plants as soon as possible, including private facilities. The Nooksack River has one of the largest dissolved inorganic nitrogen (DIN) loads in Washington State and is the receiving water to three wastewater treatment plants: Lynden, Everson, and Ferndale. The Nooksack is the largest freshwater input into Bellingham Bay which is considered dissolved oxygen impaired. Reducing the nutrient load discharging into the Bay from the Nooksack River could improve the dissolved oxygen levels and overall water quality of Bellingham Bay.

Most of the wastewater treatment plants in the United States were constructed over 40 years ago in response to the Clean Water Act and are in need of major renovations or complete overhauls. Nutrient reductions along with concerns about contaminants of concern in both wastewater and sewage sludge, in addition to the desire to reduce greenhouse gas emissions, means we need to reevaluate how we manage our wastewater. We strongly recommend that resources are found and allocated to helping municipalities redesign their wastewater treatment plants to meet these diverse and emerging challenges.

Realizing that there is not a sole solution to meeting nutrient reduction requirements, we appreciate the adaptive nature of the permit language. We would also encourage that the information learned at the individual facilities not be proprietary and be freely shared with other facilities so that everyone can benefit from this knowledge. We are hoping that Ecology can promote and facilitate this information exchange.

The Salish Sea is a stressed ecosystem and excessive nutrients are a contributing factor. It is imperative that we not only halt the increase to nutrient discharge into the Salish Sea but also work to drastically reduce it. Climate change and population growth in the Puget Sound area is going to exacerbate nutrient inputs. This permit is a step in the right direction, but it needs to be executed promptly - ahead of the permit schedule wherever possible. We fear that waiting for the 5- and 10-year permitting cycles to take place will result in irreparable damage to the Salish Sea.

Thank you for taking the time to read our letter and taking our recommendations into consideration.



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Sincerely,

Kirsten McDade  
Pollution Prevention Specialist

Eleanor Hines  
North Sound Baykeeper/Lead Scientist

References:

<sup>1</sup>Mohamedali, T., Roberts, M., Sackmann B., and Kolosseus, A. 2011. Puget Sound Dissolved Oxygen Model. Nutrient Load Summary for 1999-2008. Publication No. 11-03-057. Retrieved from: <https://apps.ecology.wa.gov/publications/documents/1103057.pdf>