



State of Washington
DEPARTMENT OF FISH AND WILDLIFE

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Main Office Location: Natural Resources Building, 1111 Washington Street SE, Olympia, WA

August 16, 2021

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

Re: Puget Sound Nutrient General Permit

Dear Eleanor Ott:

The Washington Department of Fish and Wildlife (WDFW) is tasked with preserving, protecting, and perpetuating fish, wildlife, and ecosystems while providing sustainable fish and wildlife recreational and commercial opportunities. The WDFW has worked in partnership with our sister natural resource agencies, including the Department of Ecology, to advance this mission. However, our region is growing, and despite our collective efforts to minimize associated impacts, human density has taken a toll on fish and wildlife and the habitat they depend on. Many fish and wildlife populations have been impacted, and our ability to provide hunting and fishing opportunities has decreased.

In November of 2020, WDFW released our 25-year Strategic Plan: *A Path to an Improved Era for Fish, Wildlife, and People*. As many fish and wildlife populations decline, there is a growing need for WDFW's species and habitat management work to become more precise, timely, and effective. In our plan, we highlight the need to demonstrate leadership in conservation, recovery, science, and management in order to better achieve its mission. However, we do not have the ability nor authority to achieve the necessary change alone. Conservation is a collaborative effort, and we rely on the Department of Ecology to bring its authority to bear on our state's greatest conservation challenges.

The regulation of nutrients in Puget Sound rises to one of the key areas where we rely on the Department of Ecology to make bold, timely decisions to prevent the collapse of ecosystems and species, and the pressure from nutrients will become more acute as the state's population grows in the future. These effects can impact WDFW's ability to preserve, protect, and manage fish and wildlife resources in the following ways:

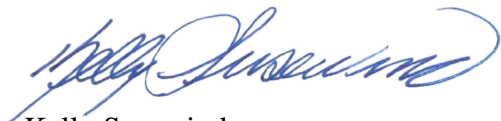
- Excessive nutrients can reduce dissolved oxygen levels in the water causing marine organisms to become lethargic and can affect their ability to locate food, avoid predators, and survive.
- Large nutrient inputs stimulate algal blooms and plant growth, ultimately leading to depletion of oxygen in water and conditions that can kill aquatic animals.
- Human sources of nutrients from wastewater treatment plants exacerbate low dissolved oxygen conditions, particularly during hot summer months when marine and estuarine organisms may be affected by other environmental stressors such as temperature and low freshwater flows.

Removal and control of nutrients in marine and estuarine waters aligns with WDFW's habitat conservation and recovery goals. We greatly appreciate the work the Department of Ecology has done to produce a Nutrient General Permit that leverages best-available science including the Salish Sea Model and 2019 Bounding Scenarios Report to spur wastewater treatment that supports fish and wildlife. We also appreciate Ecology's efforts to introduce change that reflects the needs and realities faced by municipalities by focusing on the pre-work of monitoring and planning.

However, we encourage the Department of Ecology consider modifying the final Nutrient General Permit timelines and requirements in order to improve ecological outcomes faster. The Department of Ecology is uniquely situated with the authority conferred to it via the Clean Water Act and the state to make bold and timely decisions that support the conservation and survival of fish and wildlife for current and future generations.

Thank you for this opportunity to comment on the draft Permit. If you questions, please contact Julie Watson, Killer Whale Policy Lead, at Julie.Watson@dfw.wa.gov. We look forward to continued partnership between the Department of Ecology and WDFW to support the human and ecological future of Washington State.

Sincerely,



Kelly Sussewind
Director

cc: Julie Watson