

Eleanor Ott, P.E.
Washington State Department of Ecology
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August 16, 2021
Sent via email

Re: Comment on Puget Sound Proposed Nutrients General Permit

Dear Ms. Ott:

Washington Water Trust (WWT) respectfully submits this comment to you on the Department of Ecology's proposed general permit for nutrient discharges into Puget Sound from publicly owned treatment works (POTWs).

Washington Water Trust, founded in 1998, is a non-profit conservation organization with a mission to protect and restore Washington's rivers and streams. WWT uses a collaborative approach to forging solutions that restore in-stream flows to our rivers and streams on the ground as well as supporting policies, regulations and laws that have the effect of restoring and protecting instream flows and promoting responsible stewardship of our freshwater resources, both surface and subsurface.

We do so because good stewardship of our precious freshwater resources is vital for a wide variety of benefits, including protection of instream flows, the recovery of Chinook and other salmon, aquatic productivity, water quality, aquatic species, ecosystem health, the survival of Southern Resident Killer Whales and honoring U.S. treaty obligations to Washington's tribal communities. Flow protections are crucial in light of the over-appropriation of water rights, the frequent failure to meet needed instream flows and the exacerbating impacts of climate change on water supply reliability for people and the environment.

WWT understands that DOE's proposed general permit for nutrients engages a wide variety of issues pertaining to water quality management, and the permitting of pipeline discharges, many of which are beyond our purview. However, we respectfully offer one focused recommendation. WWT strongly encourages DOE and its permittees to pursue and promote opportunities to re-use highly treated "waste" water as an important strategy for quickly and cost effectively reducing nutrient loadings into Puget Sound. Such a strategy should be accompanied by a robust monitoring and evaluation program to verify outcomes and protect public health and the environment.

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Utilizing recycled water not only would reduce loadings into Puget Sound of nutrients and other pollutants, it would also directly benefit a variety of other important water resource objectives: reducing freshwater diversions by substituting recycled water in irrigation and other upland uses, restoring instream flows, recharging aquifers, rehydrating landscapes and restoring aquatic habitats that are vital for salmon and other aquatic species. Using this already highly treated “waste” water as a new source of water for upland purposes would be a classic win-win solution.

WWT thanks you for the opportunity to comment, and we stand ready to work with DOE, the co-managers and others to realize these opportunities.

Sincerely,



William Stelle
President of the Board



James Kraft
Executive Director

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