



August 15, 2021

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Washington State Department of Ecology  
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Ms. Ott:

The Sierra Club, representing over 130,000 members and supporters across the State of Washington, welcomes this opportunity to submit comments regarding the Draft Puget Sound Nutrient General Permit.

Wastewater is the biggest human source of nitrogen pollution to Puget Sound. The Department of Ecology must prioritize stopping nitrogen pollution in an efficient way, by requiring advanced treatment at all sewage plants discharging into Puget Sound.

Sierra Club calls on the Department of Ecology to amend the Draft Nutrient General Permit to accelerate adoption of advanced treatment technologies to protect the water, salmon, orca, and the growing communities of the Puget Sound.

The current draft permit falls short in key ways.

Deadlines for largest dischargers needed - The Department of Ecology must require the largest dischargers to do more and more quickly. King County, which serves Seattle with three plants discharging to marine waters, and Tacoma, with two plants, are the largest nitrogen pollution dischargers. Together, they contribute over 70% of the nitrogen load, and they need to implement actual reductions in the next five years, while also engineering designs for construction by 2030.

Sidestream treatment needs to be brought online sooner - The Draft permit appears to have lost sidestream treatment as a viable short-term option to reduce nutrient loads while plants accommodate population growth in the next five years. The Department of Ecology should require the largest dischargers to invest in sidestream treatment in this permit term unless a discharger can show that capital improvements will be implemented within 10 years.

AKART compliance - Determining what constitutes "All Known and Reasonable Technology" (AKART) must not be left to the utilities to decide. The Department of Ecology must actively work with the utilities to fully evaluate all available technologies.

Environmental Justice reviews miss Tribal Usual and Accustomed Areas - While the Department of Ecology has included elements of environmental justice in the treatment plant requirements, it does not account for Tribal Usual and Accustomed Areas. Accordingly, the Department of Ecology should work directly with Tribes to ensure that the analyses that plants conduct are protective of Tribal Treaty Rights.



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WASHINGTON STATE

The science is certain that discharges from sewage treatment plants worsen dissolved oxygen concentrations below what would naturally occur due to natural sources of nitrogen. Now is the time to reduce sewage pollution. Puget Sound, its waters, and the communities that rely on it deserve this protection.

Sincerely,

George Watland  
Washington State Chapter  
Sierra Club