

RE Sources

Please see attached comment letter



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To: Eleanor Ott
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Transmitted Via eComment Form: <https://wq.ecology.commentinput.com/?id=QFkVE>

09 Aug 2021

RE: Draft Puget Sound Nutrient General Permit

Dear Ms. Ott,

Thank you for taking the time to consider our comment on the Draft Puget Sound Nutrient General Permit. We strongly support the regulation of nutrients from wastewater treatment plants and want to be assured that this permit will result in the reduction of nutrients into the Salish Sea in the most timely manner. The comments in this letter adjoin the organizational sign-on letter we added our name to in support.

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.

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.¹ This nutrient stress is causing eelgrass beds to decline, fish to suffocate, jellies to overpopulate, and algal blooms to worsen. Wastewater treatment plants are the largest local source of nitrogen¹ and

immediate reductions are necessary to restore the Salish Sea. While this permit is a step in the right direction nutrient reductions are needed to occur *immediately* — not in 5 or 10 years.

Increase Pressure on the Biggest Dischargers of Total Inorganic Nitrogen (TIN):

We understand the rationale behind separating WWTP plants into dominant (D) and small (S) TIN loaders. Based on Table 5. Dominant WWTPs and Total Inorganic Nitrogen Action Levels, King County and Tacoma produce the lion's share of TIN and will, therefore, have a larger influence on water degradation than the other WWTPs. Working with these dischargers to decrease their nutrient loads quickly will have dramatic results. Please consider focusing your attention on getting these WWTPs to comply with the permit requirements and to work on immediate reduction methods. Smaller dischargers should also be required to reduce their TIN as cumulative effects and localized conditions can have profound ecological effects.

Institute Numeric Water Quality Based Effluent Limits:

We appreciate the thorough explanation of why narrative water quality based effluent limits (WQBELs) are used in this permit rather than the more protective and scientific *numeric* WQBELs. However, we encourage Ecology to prioritize the development of numeric WQBELs and have them fully functional by no later than the second permit cycle.

Nutrient Reduction, not just Status Quo:

As the permit currently reads, wastewater treatment plants are not to exceed their predetermined action levels (TIN lbs/year). It is not clear if there are any incentives or future requirements for the WWTP to actually substantially *reduce* their TIN loads. Keeping nutrient loads static will not help Salish Sea recovery, it will keep it in its current state. What requirements or incentives do WWTP have to make significant nutrient reductions in this first permit cycle and beyond? In addition, the permit requires WWTP who have exceeded their action level to make a 10% reduction in their nutrient loads. It is not clear if this 10% comes off from the action level or the exceedance level. If the former and the exceedance is more than 10% then this will result in an increase in TIN discharge.

Hold Bubbled Jurisdictions Accountable for Localized Effects:

Nine wastewater treatment plants are "Bubbled" into 4 jurisdictions and are each given a "Bubbled Action Level". This appears to be done for convenience rather than ecological reasons. We have concerns that this practice could lead to some areas having increased nutrient discharges which could have significant localized impacts. Please clarify the

rationale for creating this “Bubbled” system and explain what measures will be taken to avoid localized impacts.

All Wastewater Plants Need Nutrient Reduction Plans:

Nutrients are a problem in our oceans, in our rivers, and in our ponds and lakes. We need ALL wastewater treatment plants regardless of location or ownership to engage in nutrient reduction. For example, in our county, 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.

It is evident that our water bodies in Washington State are stressed from too many nutrients, toxics, increasing water temperatures, and the manipulation of shorelines and channels. Population growth and climate change impacts will only exacerbate poor water quality conditions which can lead to severe health and economic impacts. Technologies exist *today* that can remove nutrients from our wastewater — so let’s act now and let’s act quickly to work towards a Salish Sea recovery. There is no time to stall.

We appreciate all the work that has been done to create the first ever Nutrient Permit for Puget Sound and we appreciated your time in considering our recommendations to make this a more protective and productive permit.

Sincerely,

Kirsten McDade
Pollution Prevention Specialist

Eleanor Hines
North Sound Baykeeper/Lead Scientist

References:

¹Mohamedali, 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>