

# John Corso

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John Geoffrey Corso  
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Department of Ecology  
ATTN: Eleanor Ott  
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Dear Eleanor Ott,

I support the draft PSNGP. The draft permit is a good first-step towards better understanding and regulating the discharge of human-based sources of nitrogen discharged into Puget Sound. However, this draft requires the Washington State Department of Ecology, other state agencies, and the public to trust wastewater treatment plant (WWTP) staff and management to employ one or more methods of measuring nitrogen in effluent and clearly report reliable and valid data. From my perspective as a consumer of seafood from the estuary, Tacoma Public Utilities customer, recreational fisherman, amateur environmentalist, and Southern Resident Orca fan, there is little trust and much mistrust and distrust between all parties.

Please consider modifying this draft PSNGP to require a "trust but verify" approach to measuring and reporting WWTP nutrient discharges. For example, consider requiring WWTPs to collect large samples of effluent on a regular schedule and at agreed upon location(s), using a portion of the sample to measure and report nutrients before sending the remainder of their sample to a central lab where third parties are able to obtain samples of effluent. Third parties might include environmental groups who want to check the reliability and validity of the WWTP data, colleges who want to train students to handle effluent and measure nutrients, and universities and industries interested in developing technologies for extracting nutrients from effluent or neutralizing them in the effluent. Further, all parties may be interested in measuring the full-spectrum of chemicals in effluent to identify unique chemical signatures for each WWTP's effluent based on the presence, absence and relative quantity of each chemical routinely found in their effluent. Taking water samples from dead zones and conducting a spectrochemical analysis may help investigators, like the Washington State Department of Fish and Wildlife, identify the WWTP(s) responsible for discharging more nutrient(s) into the estuary than the ecosystem can process in a healthy way. Eventually, I suspect Ecology will learn to allow some WWTPs to discharge more nutrients into the estuary than others depending on local tides, currents, winds, proximity to other WWTPs, and other variables while requiring other WWTPs to work harder to reduce the nutrients in their effluent to prevent eutrophication in the estuary.

Sincerely,

John G. Corso