

Lummi Nation (Victor Johnson)

Please accept the following comments as an official addendum to comments submitted on 8/29/25 from Lummi Nation regarding the WA Ecology draft 2025 Nonpoint Plan. On 8/27/25 Lummi Nation submitted a joint letter with comments for the WA Ecology draft Nutrient General Permit, the draft Puget Sound Nutrient Reduction Plan and the draft 2025 Nonpoint Plan. The following addendum is for section E(vii) of the 8/27/25 joint letter specific to the draft 2025 Nonpoint Plan:

Ecology should adopt legal regulations and enforcement of agricultural Best Management Practices. LNR recommends integration of findings of the April 2016 publication from the Western Environmental Law Institute Agriculture Pollution in Puget Sound ([https://westernlaw.org/wp-content/uploads/Agricultural Pollution in Puget Sound - April 2016 - Web_0.pdf](https://westernlaw.org/wp-content/uploads/Agricultural%20Pollution%20in%20Puget%20Sound%20-%20April%202016%20-%20Web_0.pdf)). In particular, LNR requests the adoption of regulations requiring double lining and leak detection in agriculture lagoons and a mandatory requirement of a nutrient management plan for third-party acceptance of manure from CAFOs.