



August 22, 2025

William Weaver, P.E.
Department of Ecology, Water Quality Program
300 Desmond Drive SE
Lacey, WA 98503

Dear Dr. Weaver,

Thank you for the opportunity to comment on the *Draft Puget Sound Nutrient General Permit*. The organizations represented by this letter are deeply concerned about the slow pace of modernizing sewage approaches for the Puget Sound region, and Washington is far behind the rest of the country. We urge Ecology to increase the pace of reducing nutrient pollution to Puget Sound and the Salish Sea, starting with sewage discharges.

Ecology must act expeditiously to regulate nutrients

Regulating sewage nutrient discharges is long overdue, as Ecology has been developing the technical basis for this for over 25 years. We urge Ecology to catch up with the rest of the country and regulate nutrient pollution from sewage treatment plants discharging to Puget Sound and the Salish Sea.

Action levels are too lax

The nitrogen load action levels remain far too permissive. Ecology set these at the 99th percentile upper confidence limit of current loads for the January 1, 2022 Puget Sound Nutrient General Permit. Washington Environmental Council (now Washington Conservation Action) and Puget Soundkeeper represented the environmental community during Advisory Committee deliberations, and at the time we specifically recommended against the 99th percentile to characterize current loads from sewage treatment plants. Not one member of the Advisory Committee advocated for using such an egregiously high statistic to characterize existing loads. Yet, Ecology continues to propose 99th percentile-based values as triggers for minimal actions in this permit. This inadvertently allows tons of nitrogen pollution above safe levels for Puget Sound, allowing dischargers to grow into these values.



In addition, Ecology now has the benefit of some of the required reporting from the initial Puget Sound Nutrient General Permit. The table confirms that actual discharges are well below the egregiously high action levels.

Ecology can and should use the same computer program and measured values that produced the 99th percentile action levels in the January 1, 2022 permit to develop more reasonable statistics, such as the 75th or even the 90th percentile of values for action levels, for this optional version of the permit.

Table 1. Nitrogen action levels and actual 2022 and 2023 discharge loads.

Sewage Discharge	Action level (lbs)	2022 reported load (lbs)	%action level	2023 reported load (lbs)	%action level
King County South King	7,340,000	4,965,000	68%	6,067,000	83%
Tacoma Central No. 1 WWTP	2,410,000	1,552,455	64%	1,865,944	77%
Post Point WWTP (Bellingham STP)	993,000	777,927	78%	786,130	79%
Midway Sewer District WWTP	625,500	341,003	55%	364,040	58%
Bremerton WWTP	602,000	375,036	62%	338,385	56%

Remove City of Tacoma and King County from this general permit

All City of Tacoma and King County facilities should receive permit limits for nitrogen discharges in their individual NPDES permits. While Ecology is giving dischargers the choice of opting into this general permit or receiving individual limits, Ecology should remove these two “mega” dischargers from the general permit entirely as they represent >60% of the sum of all action level loads. The state required Spokane to modernize sewage technology, and Ecology absolutely must hold Tacoma and King County to the same standard.



Ecology cannot approve any increases in flow for any plant discharging to the Salish Sea without concomitant reductions in nitrogen concentrations

Ecology needs to make clear that it cannot legally approve any flow increases, which would also allow increasing nitrogen loads without concomitant requirements to reduce nitrogen concentrations. This would be inconsistent with Ecology's finding that current nitrogen discharges contribute to the violations of marine dissolved oxygen water quality standards.

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Thank you for considering these comments.

Sincerely,

Ben Avery, State Director, Sierra Club Washington State Chapter

Miguela Marzolf, Conservation Policy Manager, Seattle Aquarium

Lovel Pratt, Marine Protection and Policy Director, Friends of the San Juans

Mindy Roberts, Puget Sound Program Director, Washington Conservation Action

Kirsten McDade, North Sound Waterkeeper, RE Sources

Dave Monthie, President, Deschutes Estuary Restoration Team