

Kip Summers

The LOTT Clean Water Alliance (LOTT) is supportive of the Puget Sound Nutrient General Permit (PSNGP) and Ecology's efforts to reduce nutrient discharges across Puget Sound. These discharges impact both Sound-wide water quality and local Budd Inlet dissolved oxygen conditions. This letter serves to provide LOTT's perspective on the PSNGP as Ecology considers comments on the draft.

LOTT previously submitted a renewal application for our Budd Inlet Treatment Plant NPDES permit (WA0037061). We anticipate that the new permit will align with the Budd Inlet TMDL, which generally imposes more stringent requirements than the draft PSNGP. At this time, it appears more beneficial to LOTT if the renewed permit incorporates Ecology's objectives under the PSNGP, thereby helping us avoid separate permit timelines and reporting requirements. Ideally, Ecology would retain the option for LOTT to voluntarily opt into the PSNGP in the future, should it prove favorable.

Thank you for the opportunity to comment on the draft PSNGP. Please reach out to Jesse Barham, LOTT's Environmental Planning & Programs Director, at jessebarham@lottcleanwater.org, or Matt Kennelly, LOTT's Executive Director, at mattkennelly@lottcleanwater.org, with any questions or clarifications about the comments or questions contained in this letter.

August 27, 2025

William Weaver
Washington State Department of Ecology
PO Box 47696
Lacey, WA 98504-7696

RE: LOTT comments on PSNGP

Dear Mr. Weaver:

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Sincerely,



Matthew J. Kennelly, P.E.
Executive Director

cc: Permit file

Jesse Barham, Environmental Planning & Programs Director, LOTT Clean Water Alliance
Kip Summers, Engineering Director, LOTT Clean Water Alliance