



Northwest Pulp & Paper ASSOCIATION

August 27, 2025

Submitted Via [Puget Sound Nutrient Reduction Draft Plan Online Form](#)

Jeremy Reiman
Department of Ecology, Water Quality Program
300 Desmond Dr SE
Olympia, WA 98504

Dear Mr. Reiman,

Thank you for the opportunity for the Northwest Pulp & Paper Association (NWPPA) to provide comments on Ecology's Draft Puget Sound Nutrient Reduction Plan (draft plan).

NWPPA is a 69-year-old regional trade association representing 11 member companies and 13 mills in Washington, Oregon, and Idaho, seven of which are located in Washington state. Our member mills in Washington provide approximately 4,000 union-backed, family wage jobs in some of Washington's more rural, economically distressed communities. Mills provide a 3:1 job multiplier and are often the single largest taxpayer in these communities, a large portion of which is distributed as funding for schools and emergency services.

Many of NWPPA's members are facing circumstances where the changing regulatory landscape and constraints of compliance are forcing them to rethink whether they will be able to continue operating at the same levels in Washington, or whether their efforts are better focused elsewhere. Ecology's proposal for industrial point sources in the draft plan is an example of increased regulatory burden that is unlikely to yield an observable change in total nitrogen (TN) load into Puget Sound and risks the ability of mills in Washington to operate in a cost-effective manner in the future.

Our primary concern with the draft plan is that it is based on modeling done with 2014 data. The Puget Sound region has experienced tremendous growth in the last decade, with an estimated 600,000 more people calling the region home and another 1.8 million expected over the next 30-years¹. The level of growth in the region indicates that total human nitrogen load to the Sound has likely changed since 2014. Additionally, the modeling does not adequately account for sea level rise as a non-point contributor to total nutrient load in the Sound. **We request that Ecology conduct new modeling using current data before finalizing the draft plan or developing any new nutrient limits.** Point sources cannot be expected to make significant capital investments in technologies, if available, to help achieve reductions without a plan that accurately captures the current contributions to TN load in the Sound.

¹ <https://www.psrc.org/media/4942>

Another concern with the draft plan is that industrial dischargers are being lumped in with municipal WWTPs as point sources. Ecology's supporting materials estimate that Domestic WWTPs and industrial facilities discharging into Puget Sound account for about two-thirds of the human TN load to the Sound². These materials also clarify that Washington's ten industrial facilities discharging into Puget Sound contribute about 1.7% of the TN load³. To illustrate the relative contributions from WWTPs and industrial:

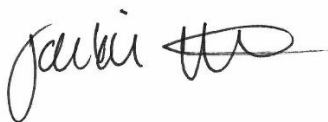
50-73% range = (48.3 – 71.3%; ~29,000 – 31,000 kg/day) WWTPs + industrial (1.7% or ~600-650 kg/day)

By this account, Washington's 10 industrial facilities not only contribute significantly less than WWTPs, but also contribute less than the direct atmospheric deposition to marine waters, which is estimated at approximately 700 kg/day. This raises questions about Ecology's decision to lump point sources together, despite such gross discrepancies in TN load contribution. Once new modeling is completed, **we request that Ecology develop a plan that addresses municipal WWTP and industrial point sources separately based on reasonable potential to achieve reductions in TN load.** As such, Ecology should also consider a technology assessment that determines whether the necessary reductions are achievable with current technology.

Lastly, NWPPA echoes and fully supports the comments submitted by Port Townsend Paper Company.

Thank you for your time and consideration of these comments.

Sincerely,



Jackie White
Director of Regulatory and Technical Affairs, NWPPA

² <https://apps.ecology.wa.gov/publications/documents/1903001.pdf>

³ <https://apps.ecology.wa.gov/publications/documents/2503003.pdf>