

August 27, 2025

Jeremy Reiman
Washington State Department of Ecology, Water Quality Program
P.O. Box 47600
Lacey, WA 98504-7600

RE: LOTT comments on PSNRP

Dear Mr. Reiman:

The LOTT Clean Water Alliance (LOTT) appreciates the opportunity to comment on the Puget Sound Nutrient Reduction Plan (PSNRP). We recognize that many other wastewater treatment plants across Puget Sound are submitting comments, and therefore we have focused our comments to the issues most directly relevant to LOTT. Our two primary concerns are:

1. The Budd Inlet TMDL represents over two decades of rigorous evaluation, engagement, and regulatory review. Given its depth and specificity, it should continue to serve as the guiding framework for LOTT's permitting.
2. LOTT implemented denitrification over 30 years ago and has continually upgraded the process to achieve what we understand to be the lowest nutrient loadings on the Puget Sound. The PSNRP's suggestion that LOTT may need to further reduce nutrient discharges appears to overlook these accomplishments and could be seen as penalizing proactive planning and effective environmental stewardship.

Our specific comments are as follows:

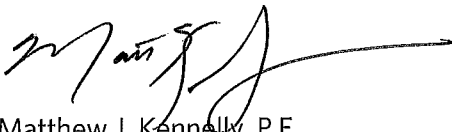
1. **Draft PSNRP page 31:** Budd Inlet TMDL hot months are listed as June-Sept, PSNRP hot months are listed as July - Sept. LOTT requests that the hot months for the PSNRP be listed as June-Sept to align with the TMDL.
2. **Draft PSNRP page 33:** Modeling scenario Opt2_8 showed TMDL allocations for Budd Inlet met PSNRP goals. Therefore, LOTT requests setting loading from LOTT at levels equal to that prescribed by the TMDL.
3. **Appendix E:** LOTT staff calculated the nutrient load allowable using 8/5/3 DIN and 2014 flow values. Our values were significantly different than that derived by Ecology and shown in Appendix E. LOTT requests that Ecology show the calculations used to create the model input loads.
4. **Appendix H, page 3 Budd Inlet TMDL:** The discrepancy between the PSNRP and the TMDL exists because they are performed using two different models and two different data sets. Therefore, there are inherent differences in these two efforts. Because the TMDL is the finished work product, LOTT

requests that the model be run using the TMDL inputs for the Budd Inlet as a set condition for the PSNRP model (SSM).

5. **Appendix H, page 4 Basin-wide Loading and Facility Allocation:** LOTT requests that the loading and allocation follow the Budd Inlet DO TMDL for Budd Inlet Treatment Plant.
6. **Appendix H, page 6 Loads vs. Concentration:** LOTT agrees with Ecology to use mass-based loading limits.
7. **Appendix H, page 6 Effluent Limit Averaging Period:** LOTT prefers the annual averaging period for nutrient limits.
8. **Budd Inlet DO TMDL page 9** states the following: "*.... this TMDL will cap nutrient loads from Budd Inlet at amounts generally below 1997 levels for most sources (see Appendix A), in order to meet the PSNRP's larger nutrient reduction schema.*" LOTT requests the PSNRP cap nutrient loads from Budd Inlet at the levels developed in the TMDL.
9. **General Comment:** There are inconsistencies in the measured parameters presented in the various documents which make it difficult to interpret and can lead to different results. (BOD vs CBOD; DIN, TIN, and TN). LOTT request parameters be converted to CBOD and TN and used for permit reporting requirements.

Thank you for the opportunity to comment on these documents. We look forward to seeing the next draft of the PSNRP. Please reach out to Jesse Barham, LOTT's Environmental Planning & Programs Director, at jessebarham@lottcleanwater.org, or me at mattkennelly@lottcleanwater.org, with any questions or clarifications about the comments in this letter.

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