

To: Jeremy Reiman  
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Water Quality Program  
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Transmitted Via Online Public Comment Form:  
<https://wq.ecology.commentinput.com/?id=9ruD7M5ie>

27 Aug 2025

**RE: Puget Sound Nutrient Reduction Draft Plan**

Dear Jeremy Reiman,

Thank you for taking the time to consider our comment on the draft Nutrient Reduction Plan (draft Plan). We appreciate that Ecology has an aspirational goal of achieving dissolved oxygen water quality standards across Puget Sound by 2050. Bellingham Bay and the waters that flow into it have serious water quality problems; we are hopeful that this plan and its subsequent efforts will help to turn the trajectory of the current water quality in the Nooksack Watershed (WRIA 1).

RE Sources is a non-profit organization located in northwest Washington and founded in 1982. We mobilize people in Northwest Washington to build just and thriving communities and to protect the land, water and climate on which we all depend. Our priority programs include Protecting the Salish Sea, Freshwater Restoration, Climate Action, and Fighting Pollution—all critical issues affecting our region. Our North Sound Baykeeper is also a member of the Waterkeeper Alliance, with over 300 organizations in 34 countries around the world that promote fishable, swimmable, drinkable water. RE Sources has thousands of supporters in Whatcom, Skagit, and San Juan counties, and we submit these comments on their behalf.

Outer Bellingham Bay is impaired for temperature and dissolved oxygen while the Inner Bay is impaired for bacteria, pH, sediment bioassay, and 39 other contaminants such as methyl mercury, phthalates, and phenols (Ecology 303(d) list). The Marine Water Condition Index Score for Bellingham Bay shows that the Bay has been in decline since 2002 with the most recent score in 2018 being a “-12” (Ecology, 2020). This is the lowest score of the twelve water bodies measured. Another study that analyzed the quality of the benthos in Bellingham Bay showed that it was the worst (the most adversely affected) of the six Puget Sound urban bays studied (Ecology 2023). Basically, only two species of tolerant benthic organisms were found in Bellingham Bay. Already impacted communities will experience

the most adverse impacts from poor water quality especially rural and indigenous communities. For example, the low dissolved oxygen in Bellingham Bay creates inhabitable areas for Dungeness crab for several days per year, this could impact the tribe's harvest.

Of the nine creeks and rivers that discharge into Bellingham Bay, eight of them are polluted for at least one parameter. Temperature, dissolved oxygen, and bacteria are the most common forms of impairments (Ecology 303(d) list). The Nooksack river, the largest freshwater contributor to the Bay and a leading driver of marine water quality, has also been in decline since the early 2000's. In 2017, the Freshwater Quality Index Score for the Nooksack was "55" (out of 100). This is the second worst river of the twenty that were analyzed (EPA 2025). The Nooksack River also has some of the highest nitrogen loads in the greater Puget Sound (Ecology - Nitrogen in Puget Sound).

- The reason these impairments are mentioned above, is to draw attention to the wider scope of the water quality problems we face in the Nooksack Watershed. It is our strong belief that an ecosystem approach needs to be taken to address not only the nutrient pollution but the other pollutants such as temperature, bacteria, and low flows. ***We hope that Ecology can formally integrate the Nutrient Reduction Plan into an Salish Sea wide restoration plan.***

A good start would be to create a mechanism where stream buffers are planted and trees and shrubs are left in the watershed. Vegetation along the waterways and in the headwaters of the streams will help keep temperatures down, filter out nutrients, bacteria, and other stormwater contaminants, and keep water in the ground and help augment low flows. ***Up until now, best management practices (BMPs) such as planting and maintaining buffers, have been mostly voluntary. Based on the state of the waterways described above, this clearly is not working and we need more aggressive action on a quicker timeline.*** The Washington State's Water Pollution Control Act gives Ecology the authority to regulate both point and nonpoint source pollution; we hope that Ecology will utilize this authority.

Whatcom County is second only to Yakima in the number of animal feeding operations (AFOs) and the berry industry here is large and growing quickly. Both of these intensive agricultural practices contribute bacteria, nutrients, and other contaminants to our rivers and streams. It is not clear in the Nutrient Reduction Plan, how contaminants, including nitrogen, will be monitored and traced in the watershed. The environmental community has been trying, unsuccessfully, to monitor, track, and trace bacteria from AFOs for decades. How will this nutrient plan succeed where past efforts have failed? ***We hope that Ecology will find a way to monitor nutrients and bacteria adequately to hold polluters accountable.***

The draft Nutrient Reduction Plan initially targets nutrient reduction at wastewater treatment plants but at the same time authorizes the Biosolids General Permit, a

contributor to the nutrient problem, nitrogen specifically. About half of the sludge in Washington State is processed in anaerobic digesters and spread on land. This technology increases the amount of nitrogen that is released in the effluent and contributes considerable toxic contamination to our land, which inevitably ends up in our waterways. ***We ask that Ecology reconcile the simultaneous attempt to reduce nutrients at WWTPs while also allowing nutrient and contaminant pollution to occur on the land and water through permitting biosolids.*** We have similar concerns in regards to using reclaimed water; we want to be assured that we are not spreading toxic chemicals across the landscape.

Nutrient Credit Trading was described in the Marine Point Sources section of the draft Plan and it appears that trading may only occur between wastewater treatment plants. ***We encourage Ecology to take an ecosystem based approach on this and allow trading within watersheds regardless of the sources.*** In the Nooksack watershed for example, the leading sources of nitrogen are coming from the streams and rivers, not Post Point WWTP, therefore, if the WWTP is struggling to reduce nitrogen it makes more sense to reduce nitrogen locally than from outside the watershed.

RE Sources supports Ecology's Nutrient Reduction Plan and the Puget Sound Nutrient General Permit as a means to reduce nutrients entering the Salish Sea. We hope that Ecology will strengthen the permit and use it to its full potential. Based on the decades-long decline in water quality in Bellingham Bay and the streams that feed it, we recommend that Ecology prioritize the Nooksack watershed (WRIA 1) in implementing the Nutrient Reduction Plan. We strongly encourage Ecology to integrate nutrient reduction, adjudication, NPDES permits, and nature-based solutions into a comprehensive ecosystem restoration plan for the entire WRIA 1 Nooksack watershed. Addressing one impairment at a time is inefficient and will likely not result in comprehensive improvements.

The Nutrient Reduction Plan is ambitious and a watershed-wide restoration plan is even more ambitious. We recognize that these endeavors will take considerable resources and authority to enforce. We hope that Ecology will reach out to RE Sources and the community at large to help advocate for the necessary funds to support the various programs that will help keep our environment from further decline. We also hope that Ecology will use its authority to ensure that the timeline in this Plan is met.

Thank you for the opportunity to comment on the draft Nutrient Reduction Plan and we appreciate you taking the time to read our thoughts.

Sincerely,

Kirsten McDade  
North Sound Waterkeeper  
RE Sources

**References:**

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