



LOUISIANA WILDLIFE FEDERATION

"... conserving our natural resources and your right to enjoy them since 1940."

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September 6, 2017

Louisiana Department of Environmental Quality
Office of Environmental Services
Public Participation and Permit Support Division
PPG Supervisor
P.O. Box 4313
Baton Rouge, LA 70821-4313

RE: City of Mandeville Wastewater Discharge Permit, WPS-WAP AI 19420, Permit Number LA0038288,
Activity Number PER20140002

Dear Public Participation Group,

Louisiana Wildlife Federation (LWF) has reviewed the draft permit associated with the City of Mandeville Chinchuba Swamp and East Tchefoncté Marsh Wetland Assimilation Project, as described in the Louisiana Pollutant Discharge Elimination System (LPDES) permit No. LA0038288. In the past ten years, new information has come to light regarding the impacts to natural wetlands receiving treated wastewater. The preponderance of information suggests that treated wastewater assimilation projects may be more harmful than beneficial to natural wetlands including both marsh and forested wetlands. We believe that there are better alternatives.

LWF would like to note the following concerns with the proposed permit.

- The priority pollutant limits for both lead and zinc have been removed.
- The draft permit has implemented higher discharge concentrations of Total Suspended Solids (TSS) and Biological Oxygen Demand (BOD). Allowing for increased discharges of these parameters may result in ineffective disinfection by ultraviolet light.
- The project has been documented to overload the assimilation area with nutrients Total Nitrogen (TN) and Total Phosphorus (TP). We request that the permittee specify the management strategy that will be implemented in the project area to address overloading, as identified by US EPA.
- Several invasive species that thrive in high-nutrient waters have been observed in the project area. We request that the permittee will identify an invasive species management plan.
- The wetland productivity measures have ambiguous or unclear defined compliance terms. We wish to further identify our concerns with these protocols and permit requirements in a public hearing format.

On behalf of LWF's Board of Directors and our more than 7,300 members, thank you for the opportunity to provide comments on the permit. **We request a public hearing to discuss in detail the concerns expressed with the draft permit as outlined above.**

Sincerely,

Rebecca Triche, Executive Director