

David Habib

Dear Ms. Ott, Thank you for the opportunity to comment on the Puget Sound Nutrient General Permit. Clean water is important to me personally, and we are glad to see the Department of Ecology requiring Puget Sound utilities to transition to more protective sewage treatment standards. As you know, many cities and counties have already implemented nutrient-removal technology, from Shelton to Spokane. It's time for all utilities in the region to step up and to do so quickly. While we want this permit to move forward, we would also like to call your attention to three areas of improvement that are needed: 1. Seattle, King County, and Tacoma are the largest dischargers, contributing over 70% of the nitrogen load, and they need to move further and faster during this permit term. They need to implement actual reductions in the next five years while also developing Nutrient Reduction Evaluation with a deadline of construction by 2030 to avoid them extending this out multiple decades. 2. The nutrient load action levels remain too permissive. Ecology set these at the 99th percentile upper confidence limit of current loads, even though no one advocated for this permissive of a statistic. This inadvertently allows tons of nitrogen pollution above safe levels for Puget Sound to protect a number that simply triggers planning activities. 3. Ecology should not delegate responsibility for determining what represents "reasonable" technology to individual plants. Ecology must maintain the responsibility to determine what constitutes "All Known and Reasonable Technology." In closing, while you may hear false claims that the science is uncertain or that cleaning up sewage really won't make a big difference, please know that I disagree. Now is the time to reduce sewage pollution. Puget Sound, its waters, and the communities that rely on it deserve this protection. Sincerely, David Habib 555 5th Ave W Kirkland, WA 98033