

## Washington Environmental Council members

Attached please find comments submitted by Vickie Woo, Sean Edmison, Donald Wingard, Marco de la Rosa, Virginia Davis, Dean Fournier, Stuart Mork, Priscilla Martinez, Mark Ashley, Pamela Carlton, James Owen, Evelyn Bittner, Michael Albrecht, Emily Davis, David Mudd, Catherine Cloud, Alan Dieringer, plus another 441 residents of Washington and 259 residents of other states across the country who wanted to express support for clean water in Puget Sound. Rather than sending 717 separate messages, we compiled these for you and attach their messages and email addresses (as PDF). Let us know if we can mail you an XLS version of email addresses since the e-comment portal does not accept that format. These are all individual comments however.

Department of Ecology,

Thank you for the opportunity to comment on the preliminary draft of the Puget Sound Nutrient General Permit. Nutrients from treated sewage worsen dissolved oxygen and ocean acidification in Puget Sound, and now is the time to transition wastewater treatment plants to advanced technology to reduce nutrients. I care about shared waters such as Puget Sound, and the communities and wildlife they support.

Many treatment plants across the state already have upgraded to nutrient-removal technology, from Shelton to Sequim to Spokane. Olympia's wastewater treatment plant has been operating with nutrient removal technology in place for over 25 years, all the while providing reasonable rates to new and existing customers.

We need all Puget Sound dischargers to plan for this transition now, including tuning their existing discharges using what's called optimization. Optimization can decrease nutrient concentrations enough to hold the line on loads to Puget Sound, while accommodating the growth and development we can expect over the next 5 years.

When the draft permit is released for the next round of public comment, we do not want to see any of the provisions weakened from what is presented in the preliminary draft. Instead, we urge you to do the following:

- Make the action limit loads more protective by reducing them. The current values are too lax, given that they simply trigger additional planning actions. The environmental community supports the use the 95th percentile estimates instead of the 99th percentile estimates of current loads and no one has expressed a reason for using the 99th percentile to date.
- The largest dischargers – Seattle, King County and Tacoma – need to do more. Right now, these plants are not required to do more than smaller plants. Together their plants discharge two-thirds of the total load of nitrogen, and it's fair for them to do more for clean water sooner than other plants.
- Trigger actual progress toward clean water. Any plants with loads higher than the secondary threshold need to begin transitioning to full design to achieve low nitrogen concentrations, and the Tier 3 actions should only include these actions. The other actions listed in the preliminary draft should shift to Tier 2 actions.

Thank you for your important role in protecting the people, communities, waters, and wildlife of Puget Sound. People throughout the Salish Sea and the state want to see wastewater pollution reduced, and this is an important step in doing so.

Sincerely,

700 advocates

As you know, nutrients from treated sewage worsen dissolved oxygen and ocean acidification in Puget Sound, and now is the time to transition wastewater treatment plants to advanced technology to reduce nutrients. I care about shared waters such as Puget Sound, and the communities and wildlife they support. It's your job to care too.

You also know many treatment plants across the state already have upgraded to nutrient-removal technology, from Shelton to Sequim to Spokane. Olympia's wastewater treatment plant has been operating with nutrient removal technology in place for over 25 years, all the while providing reasonable rates to new and existing customers.

We need all Puget Sound dischargers to plan for this transition NOW, including tuning their existing discharges using what's called optimization. And as you also know, optimization can decrease nutrient concentrations enough to hold the line on loads to Puget Sound, while accommodating the growth and development we can expect over the next 5 years.

In anticipation of when the draft permit is available for public comment, I want you to do the following:

- Make the action limit loads more protective by reducing them. The current values are too lax, given that they simply trigger additional planning actions. The environmental community supports the use of the 95th percentile estimates instead of the 99th percentile estimates of current loads and no one has expressed a reason for using the 99th percentile to date.
- The largest dischargers – Seattle, King County and Tacoma – need to do more. Right now, these plants are not required to do more than smaller plants. Together their plants discharge two-thirds of the total load of nitrogen, and it's fair for them to do more for clean water sooner than other plants.
- Trigger actual progress toward clean water. Any plants with loads higher than the secondary threshold need to begin transitioning to full design to achieve low nitrogen concentrations, and the Tier 3 actions should only include these actions. The other actions listed in the preliminary draft should shift to Tier 2 actions.

Thank you for your important role in protecting the people, communities, waters, and wildlife of Puget Sound. People throughout the Salish Sea and the state want to see wastewater pollution reduced, and this is an important step in doing so.

Vickie Woo  
Seattle, WA

Thank you for the opportunity to comment on the preliminary draft of the Puget Sound Nutrient General Permit.

In many communities, such as ours in the West Sound, significant numbers of waterfront households utilize home wastewater systems (septic tanks). When these systems are owned by low income or uneducated families inadequate management is common, and this situation results in contamination of the smaller bays of the Salish Sea. These bays are important for transit and adolescent fish support of species such as salmon. We need to do better. Either transport of wastewater to sewage systems or strong controls and better technology on home wastewater system performance.

Nutrients from treated sewage worsen dissolved oxygen and ocean acidification in Puget Sound, and now is the time to transition wastewater treatment plants to advanced technology to reduce nutrients. I care about shared waters such as Puget Sound, and the communities and wildlife they support.

Many treatment plants across the state already have upgraded to nutrient-removal technology, from Shelton to Sequim to Spokane. Olympia's wastewater treatment plant has been operating with nutrient removal technology in place for over 25 years, all the while providing reasonable rates to new and existing customers.

Thank you for your important role in protecting the people, communities, waters, and wildlife of Puget Sound. People throughout the Salish Sea and the state want to see wastewater pollution reduced, and this is an important step in doing so.

Sean Edmison  
Redmond, WA

Thank you for the opportunity to comment on the preliminary draft of the Puget Sound Nutrient General Permit.

Having lived by Puget Sound nearly all our long lives, we have seen the degradation first hand. Now is the time to transition wastewater treatment plants to advanced technology to reduce nutrients.

Many treatment plants across the state already have upgraded to nutrient-removal technology, from Shelton to Sequim to Spokane. Olympia's wastewater treatment plant has been operating with nutrient removal technology in place for over 25 years, all the while providing reasonable rates to new and existing customers.

We need all Puget Sound dischargers to plan for this transition now, including tuning their existing discharges using what's called optimization. Optimization can decrease nutrient concentrations enough to hold the line on loads to Puget Sound, while accommodating the growth and development we can expect over the next 5 years.

When the draft permit is released for the next round of public comment, we do not want to see any of the provisions weakened from what is presented in the preliminary draft. Instead, we urge you to do the following:

- Make the action limit loads more protective by reducing them. The current values are too lax, given that they simply trigger additional planning actions. The environmental community supports the use the 95th percentile estimates instead of the 99th percentile estimates of current loads and no one has expressed a reason for using the 99th percentile to date.
- The largest dischargers – Seattle, King County and Tacoma – need to do more. Right now, these plants are not required to do more than smaller plants. Together their plants discharge two-thirds of the total load of nitrogen, and it's fair for them to do more for clean water sooner than other plants.
- Trigger actual progress toward clean water. Any plants with loads higher than the secondary threshold need to begin transitioning to full design to achieve low nitrogen concentrations, and the Tier 3 actions should only include these actions. The other actions listed in the preliminary draft should shift to Tier 2 actions.

Thank you for your important role in protecting the people, communities, waters, and wildlife of Puget Sound. People throughout the Salish Sea and the state want to see wastewater pollution reduced, and this is an important step in doing so.

Donald Wingard  
Gig Harbor, WA

Thank you for the opportunity to comment on the preliminary draft of the Puget Sound Nutrient General Permit.

Nutrients from treated sewage degrade dissolved oxygen and ocean acidification in Puget Sound, and now is the time to transition wastewater treatment plants to ADVANCED technology to reduce those nutrients. I care about shared waters such as the Salish Sea / Puget Sound, and the communities, fisheries and wildlife they support.

Many treatment plants across the state already have upgraded to nutrient-removal technology, from Shelton to Sequim to Spokane. Olympia's waste-water treatment plant has been operating with nutrient removal technology in place for OVER 25 years, and meanwhile providing reasonable rates to new and existing customers.

We need all Puget Sound dischargers to plan for this transition NOW, including tuning their existing discharges using what's called optimization. Optimization can DECREASE nutrient concentrations enough to hold the line on loads to Puget Sound, while accommodating the growth and development we can expect over the next 5 years.

When the draft permit is released for the next round of public comment, we do NOT want to see any of the provisions weakened from what is presented in the preliminary draft. Instead, we urge you to do the following :

- Make the action limit loads more protective by REDUCING them. The current values are too LAX, given that they simply trigger additional planning actions. The environmental community supports the use of the 95th percentile estimates instead of the 99th percentile estimates of current loads and no one has expressed a reason for using the 99th percentile to date.
- The largest dischargers – Seattle, King Co. and Tacoma – need to do MORE. Right now, these plants are not required to do more than smaller plants. Together their plants discharge 2/3rds of the total load of nitrogen, and it's fair for them to do more for clean water sooner than other plants.
- Trigger actual progress toward clean water. Any plants with loads higher than the secondary threshold need to begin transitioning to full design to achieve low nitrogen concentrations, and the Tier 3 actions should ONLY include these actions. The other actions listed in the preliminary draft should shift to Tier 2 actions.

Thank you for your important role in protecting the people, communities, waters and wildlife of Puget Sound. People throughout the Salish Sea and the state want to see wastewater pollution GREATLY REDUCED, and this is an important step in doing so.

Marco de la Rosa  
Kirkland, WA

Thank you for the opportunity to comment on the preliminary draft of the Puget Sound Nutrient General Permit.

It is now time to transition wastewater treatment plants to advanced technology to reduce nutrients. Nutrients from treated sewage worsen dissolved oxygen and ocean acidification in Puget Sound. I care about shared waters such as Puget Sound, and the communities and wildlife they support.

Many treatment plants across the state already have upgraded to nutrient-removal technology, from Shelton to Sequim to Spokane. Olympia's wastewater treatment plant has been operating with nutrient removal technology in place for over 25 years, all the while providing reasonable rates to new and existing customers.

We need all Puget Sound dischargers to plan for this transition now, including tuning their existing discharges using what's called optimization. Optimization can decrease nutrient concentrations enough to hold the line on loads to Puget Sound, while accommodating the growth and development we can expect over the next 5 years.

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- \* The largest dischargers (Seattle, King County and Tacoma) need to do more. Right now, these plants are not required to do more than smaller plants. Together their plants discharge two-thirds of the total load of nitrogen, and it's fair for them to do more for clean water sooner than other plants.
- \* Trigger actual progress toward clean water. Any plants with loads higher than the secondary threshold need to begin transitioning to full design to achieve low nitrogen concentrations, and the Tier 3 actions should only include these actions. The other actions listed in the preliminary draft should shift to Tier 2 actions.

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Virginia Davis  
Woodinville, WA

I appreciate the opportunity to comment on the preliminary draft of the Puget Sound Nutrient General Permit. Nutrients from treated sewage worsen dissolved oxygen and ocean acidification in Puget Sound, and now is the time to transition wastewater treatment plants to advanced technology for reduction of those nutrients. I care about shared waters such as Puget Sound, and the communities and wildlife they support.

Many treatment plants across the state -- from Shelton to Sequim to Spokane -- have already upgraded to appropriate nutrient-removal technology. Olympia's wastewater treatment plant has been operating with effective nutrient-removal technology for over 25 years, while providing reasonable rates to new and existing customers.

We need all Puget Sound dischargers to plan for this transition now, including tuning their existing discharges using what's called optimization. Optimization can decrease nutrient concentrations enough to hold the line on loads to Puget Sound, while accommodating the growth and development expected over the next five years.

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Thank you for your important role in protecting the people, communities, waters, and wildlife of Puget Sound. People throughout the Salish Sea and the state want to see wastewater pollution reduced, and this is an important step in doing so.

Dean Fournier  
Seattle, WA



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Many treatment plants across the state already have upgraded to nutrient-removal technology, from Shelton to Sequim to Spokane. Olympia's wastewater treatment plant has been operating with nutrient removal technology in place for over 25 years, all the while providing reasonable rates to new and existing customers.

We need all Puget Sound dischargers to plan for this transition now, including tuning their existing discharges using what's called optimization. Optimization can decrease nutrient concentrations enough to hold the line on loads to Puget Sound, while accommodating the growth and development we can expect over the next 5 years.

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- The largest dischargers – Seattle, King County and Tacoma – need to do more. Right now, these plants are not required to do more than smaller plants. Together their plants discharge two-thirds of the total load of nitrogen, and it's fair for them to do more for clean water sooner than other plants.
- Trigger actual progress toward clean water. Any plants with loads higher than the secondary threshold need to begin transitioning to full design to achieve low nitrogen concentrations, and the Tier 3 actions should only include these actions. The other actions listed in the preliminary draft should shift to Tier 2 actions.

Thank you for your important role in protecting the people, communities, waters, and wildlife of Puget Sound. People throughout the Salish Sea and the state want to see wastewater pollution reduced, and this is an important step in doing so.

Without taking the necessary action to clean discharges into Puget Sound we can see the future. Witness the dead zones where the Mississippi River empties into the Gulf of Mexico, and the declining water quality of the Chesapeake Bay.

Stuart Mork  
Seattle, WA

Thank you for the opportunity to comment on the preliminary draft of the Puget Sound Nutrient General Permit. Nutrients from treated sewage worsen dissolved oxygen and ocean acidification in Puget Sound, and now is the time to transition wastewater treatment plants to advanced technology to reduce nutrients. I care about shared waters such as Puget Sound, and the communities and wildlife they support.

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We need all Puget Sound dischargers to plan for this transition now, including tuning their existing discharges using what's called optimization. Optimization can decrease nutrient concentrations enough to hold the line on loads to Puget Sound, while accommodating the growth and development we can expect over the next 5 years.

We need to take better care of what is left of our environment, for people, wildlife, marine life, and plant life.

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- The largest dischargers – Seattle, King County and Tacoma – need to do more. Right now, these plants are not required to do more than smaller plants. Together their plants discharge two-thirds of the total load of nitrogen, and it's fair for them to do more for clean water sooner than other plants.
- Trigger actual progress toward clean water. Any plants with loads higher than the secondary threshold need to begin transitioning to full design to achieve low nitrogen concentrations, and the Tier 3 actions should only include these actions. The other actions listed in the preliminary draft should shift to Tier 2 actions.

Thank you for your important role in protecting the people, communities, waters, and wildlife of Puget Sound. People throughout the Salish Sea and the state want to see wastewater pollution reduced, and this is an important step in doing so.

Priscilla Martinez

Thank you for the opportunity to comment on the preliminary draft of the Puget Sound Nutrient General Permit. Because nutrients from treated sewage worsen dissolved oxygen and ocean acidification in Puget Sound, I ask that you transition wastewater treatment plants to advanced technology to reduce nutrients. I care about the shared waters of Puget Sound and the communities and wildlife that they support.

Many treatment plants across the state, from Shelton to Sequim to Spokane, already have upgraded to nutrient-removal technology. Olympia's wastewater treatment plant has been operating with nutrient removal technology in place for over 25 years, all while providing reasonable rates to new and existing customers.

We need all Puget Sound dischargers to plan for this transition now, including tuning their existing discharges using what's called optimization. As you know, optimization can decrease nutrient concentrations enough to hold the line on loads to Puget Sound while accommodating the growth and development we can expect over the next 5 years.

When the draft permit is released for the next round of public comment, we don't want to see any of the provisions weakened from what is presented in the preliminary draft. Instead, we urge you to:

- Make the action limit loads more protective by reducing them. The current values are too lax, given that they simply trigger additional planning actions. The environmental community supports the use the 95th percentile estimates instead of the 99th percentile estimates of current loads and no one has expressed a reason for using the 99th percentile to date.
- Require that the largest dischargers – Seattle, King County and Tacoma – do more than smaller plants. Together their plants discharge two-thirds of the total load of nitrogen, and it's fair for them to do more for clean water sooner than other plants.
- Trigger actual progress toward clean water. Any plants with loads higher than the secondary threshold need to begin transitioning to full design to achieve low nitrogen concentrations, and the Tier 3 actions should only include these actions. The other actions listed in the preliminary draft should shift to Tier 2 actions.

Thank you for protecting the people, communities, waters, and wildlife of Puget Sound. People throughout the Salish Sea and the state want to see wastewater pollution reduced, and this is an important step in doing so.

Mark Ashley  
Bainbridge Island, WA

Thank you for the opportunity to comment on the preliminary draft of the Puget Sound Nutrient General Permit. Nutrients from treated sewage worsen dissolved oxygen and ocean acidification in Puget Sound, and now is the time to transition wastewater treatment plants to advanced technology to reduce nutrients. I care about shared waters such as Puget Sound, and the communities and wildlife they support.

Many treatment plants across the state already have upgraded to nutrient-removal technology, from Shelton to Sequim to Spokane. Olympia's wastewater treatment plant has been operating with nutrient removal technology in place for over 25 years, all the while providing reasonable rates to new and existing customers.

We need all Puget Sound dischargers to plan for this transition now, including tuning their existing discharges using what's called optimization. Optimization can decrease nutrient concentrations enough to hold the line on loads to Puget Sound, while accommodating the growth and development we can expect over the next 5 years.

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- The largest dischargers – Seattle, King County and Tacoma – need to do more. Right now, these plants are not required to do more than smaller plants. Together their plants discharge two-thirds of the total load of nitrogen, and it's fair for them to do more for clean water sooner than other plants.
- Trigger actual progress toward clean water. Any plants with loads higher than the secondary threshold need to begin transitioning to full design to achieve low nitrogen concentrations, and the Tier 3 actions should only include these actions. The other actions listed in the preliminary draft should shift to Tier 2 actions.

Clean water is a gift that is still possible for those of us who are privileged to live in beautiful Washington state and in this country. Please help all living things thrive in our state.

Thank you for your important role in protecting the people, communities, waters, and wildlife of Puget Sound. People throughout the Salish Sea and the state want to see wastewater pollution reduced, and this is an important step in doing so.

Pamela Carlton  
Tacoma, WA

Thank you for the opportunity to comment on the preliminary draft of the Puget Sound Nutrient General Permit. I believe we can and should do a better job cleaning up the water we release into the Puget Sound.

Now is the time to transition wastewater treatment plants to advanced technology to reduce nutrients. I care about shared waters such as Puget Sound, and the communities and wildlife they support.

Many treatment plants across the state already have upgraded to nutrient-removal technology, from Shelton to Sequim to Spokane -- we can, too.

We need all Puget Sound dischargers to plan for this transition now.

Thank you for your important role in protecting the people, communities, waters, and wildlife of Puget Sound. People throughout the Salish Sea and the state want to see wastewater pollution reduced, and this is an important step in doing so.

James Owen  
Bainbridge Island, WA

Thank you for the opportunity to comment on the preliminary draft of the Puget Sound Nutrient General Permit. Nutrients from treated sewage worsen dissolved oxygen and ocean acidification in Puget Sound, and now is the time to transition wastewater treatment plants to advanced technology to reduce nutrients. I care about shared waters such as Puget Sound, and the communities and wildlife they support. It's frustrating to keep hearing about accidental or even allowed discharges of sewage into the sound. We all know how damaging these are, yet many large municipalities are not investing in upgrades and technology that already exists to prevent this.

Many treatment plants across the state already have upgraded to nutrient-removal technology, from Shelton to Sequim to Spokane. Olympia's wastewater treatment plant has been operating with nutrient removal technology in place for over 25 years, all the while providing reasonable rates to new and existing customers.

We need all Puget Sound dischargers to plan for this transition now, including tuning their existing discharges using what's called optimization. Optimization can decrease nutrient concentrations enough to hold the line on loads to Puget Sound, while accommodating the growth and development we can expect over the next 5 years.

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- The largest dischargers – Seattle, King County and Tacoma – need to do more. Right now, these plants are not required to do more than smaller plants. Together their plants discharge two-thirds of the total load of nitrogen, and it's fair for them to do more for clean water sooner than other plants.
- Trigger actual progress toward clean water. Any plants with loads higher than the secondary threshold need to begin transitioning to full design to achieve low nitrogen concentrations, and the Tier 3 actions should only include these actions. The other actions listed in the preliminary draft should shift to Tier 2 actions.

Thank you for your important role in protecting the people, communities, waters, and wildlife of Puget Sound. People throughout the Salish Sea and the state want to see wastewater pollution reduced, and this is an important step in doing so. Action is overdue! We can't afford to wait any longer.

Evelyn Bittner  
Seattle, WA

Humans are the only species on the planet that routinely dirties its own nest. Given that clean water is crucial for life on Earth, it is a no-brainer that we MUST do everything we can to protect it!

Thank you for the opportunity to comment on the preliminary draft of the Puget Sound Nutrient General Permit. Nutrients from treated sewage worsen dissolved oxygen and ocean acidification in Puget Sound, and now is the time to transition wastewater treatment plants to advanced technology to reduce nutrients. I care about shared waters such as Puget Sound, and the communities and wildlife they support.

Many treatment plants across the state already have upgraded to nutrient-removal technology, from Shelton to Sequim to Spokane. Olympia's wastewater treatment plant has been operating with nutrient removal technology in place for over 25 years, all the while providing reasonable rates to new and existing customers.

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- The largest dischargers – Seattle, King County and Tacoma – need to do more. Right now, these plants are not required to do more than smaller plants. Together their plants discharge two-thirds of the total load of nitrogen, and it's fair for them to do more for clean water sooner than other plants.
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Thank you for your important role in protecting the people, communities, waters, and wildlife of Puget Sound. People throughout the Salish Sea and the state want to see wastewater pollution reduced, and this is an important step in doing so.

Michael Albrecht  
Grayland, WA

Thank you for the opportunity to comment on the preliminary draft of the Puget Sound Nutrient General Permit. Nutrients from treated sewage worsen dissolved oxygen and ocean acidification in Puget Sound, and now is the time to transition wastewater treatment plants to advanced technology to reduce nutrients. I care about shared waters such as Puget Sound, and the communities and wildlife they support.

Many treatment plants across the state already have upgraded to nutrient-removal technology, from Shelton to Sequim to Spokane. Olympia's wastewater treatment plant has been operating with nutrient removal technology in place for over 25 years, all the while providing reasonable rates to new and existing customers.

We need all Puget Sound dischargers to plan for this transition now, including tuning their existing discharges using what's called optimization. Optimization can decrease nutrient concentrations enough to hold the line on loads to Puget Sound, while accommodating the growth and development we can expect over the next 5 years.

I'd also like to note that many southern states have advanced wastewater treatment plants that are reusing wastewater for indirect potable reuse. While this is an expensive option for an area like ours, which is not so water scarce, given the progression of climate change, putting money toward forward thinking water resource planning and infrastructure development is critical for supporting the water needs of our State in the future.

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- Trigger actual progress toward clean water. Any plants with loads higher than the secondary threshold need to begin transitioning to full design to achieve low nitrogen concentrations, and the Tier 3 actions should only include these actions. The other actions listed in the preliminary draft should shift to Tier 2 actions. Thank you for your important role in protecting the people, communities, waters, and wildlife of Puget Sound. People throughout the Salish Sea and the state want to see wastewater pollution reduced, and this is an important step in doing so.

Emily Davis  
Seattle, WA



I am a retired fish and wildlife biologist with years of experience with the biology of Puget Sound. I have seen firsthand the challenges that the Sound faces. Thank you for the opportunity to comment on the preliminary draft of the Puget Sound Nutrient General Permit. Nutrients from treated sewage worsen dissolved oxygen and ocean acidification in Puget Sound, and now is the time to transition wastewater treatment plants to advanced technology to reduce nutrients. I care about shared waters such as Puget Sound, and the communities and wildlife they support.

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David Mudd  
Bothell, WA

Canned message follows and I'm behind it all the way. Water is the source and sustenance of life. Let's clean it up and take care of it, OK?

Thank you for the opportunity to comment on the preliminary draft of the Puget Sound Nutrient General Permit. Nutrients from treated sewage worsen dissolved oxygen and ocean acidification in Puget Sound, and now is the time to transition wastewater treatment plants to advanced technology to reduce nutrients. I care about shared waters such as Puget Sound, and the communities and wildlife they support.

Many treatment plants across the state already have upgraded to nutrient-removal technology, from Shelton to Sequim to Spokane. Olympia's wastewater treatment plant has been operating with nutrient removal technology in place for over 25 years, all the while providing reasonable rates to new and existing customers.

We need all Puget Sound dischargers to plan for this transition now, including tuning their existing discharges using what's called optimization. Optimization can decrease nutrient concentrations enough to hold the line on loads to Puget Sound, while accommodating the growth and development we can expect over the next 5 years.

When the draft permit is released for the next round of public comment, we do not want to see any of the provisions weakened from what is presented in the preliminary draft. Instead, we urge you to do the following:

- Make the action limit loads more protective by reducing them. The current values are too lax, given that they simply trigger additional planning actions. The environmental community supports the use the 95th percentile estimates instead of the 99th percentile estimates of current loads and no one has expressed a reason for using the 99th percentile to date.
- The largest dischargers – Seattle, King County and Tacoma – need to do more. Right now, these plants are not required to do more than smaller plants. Together their plants discharge two-thirds of the total load of nitrogen, and it's fair for them to do more for clean water sooner than other plants.
- Trigger actual progress toward clean water. Any plants with loads higher than the secondary threshold need to begin transitioning to full design to achieve low nitrogen concentrations, and the Tier 3 actions should only include these actions. The other actions listed in the preliminary draft should shift to Tier 2 actions.

Thank you for your important role in protecting the people, communities, waters, and wildlife of Puget Sound. People throughout the Salish Sea and the state want to see wastewater pollution reduced, and this is an important step in doing so.

Catherine Cloud  
Stanwood, WA

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