

Richard Donnelly

THIS EMAIL ORIGINATED FROM OUTSIDE THE WASHINGTON STATE EMAIL SYSTEM
- Take caution not to open attachments or links unless you know the sender AND were expecting the attachment or the link
Dear Ms. Eleanor Ott, I support the Department of Ecology in its decision to create a new General Clean Water Act Permit to control nutrient pollution from Puget Sound sewage treatment plants. Right now, dissolved oxygen levels in many parts of Puget Sound and the Salish Sea are below the levels needed for fish and other marine life to thrive. Nutrient pollution from human activity is worsening the region's naturally low oxygen levels. Years of research and scientific data confirm that municipal sewage treatment plants are the biggest human source of Puget Sound's nutrient problem, though there are other significant sources. The Draft Permit is a good concept but lacks critical provisions that, if implemented, will better protect clean water. We can do better, and we must act now. We can't keep waiting for future generations to deal with our waste. Primarily, I recommend these changes to better protect clean water:—The Permit must do more to reduce nutrient pollution in the first permit cycle at all plants, but even more so at the largest wastewater treatment plants that contribute most of the pollution to the Sound. “Nutrient action levels” should be lower, and small plants should be required to take reasonable measures to reduce their discharges: they should be required to hold the load. —The Permit should have rolling compliance requirements, corrective actions should trigger sooner, and corrective reductions should be demonstrated earlier in the Permit cycle.—The Permit must be enforceable and must be designed to meet Clean Water Act requirements on a timely schedule, regardless of what happens in the future with external processes, such as Salish Sea Model runs and development of Water Quality Based Effluent limits. Thank you for considering my comments. Regards, Richard Donnelly 2305 37th St Bellingham, WA 98229