

Virginia Davis

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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. If created carefully, A Puget Sound Nutrient General Permit can be an effective way to stop this known and preventable pollution source. 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.

I care deeply about clean water and protecting Puget Sound for the health and survival of salmon, orca, and all communities that depend on clean water. Our nutrient pollution problem is already throwing the food web off balance and exacerbating ocean acidification in the Sound. Population growth and climate change are compounding pressures that make this dire situation even more urgent. The danger is here. We must act now to increase capacity, reduce pollution, and improve the handling of waste at municipal sewage treatment plants in our region. Thank you for considering my comments.

Regards, Virginia Davis
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