Dr. Carol Couch, Director
Environmental Protection Division, Department of Natural Resources
2 Martin Luther King, Jr. Drive, Suite 1152 S.E., Floyd Towers East
Atlanta, Georgia 30334

Re: NPDES Permit No. GA0038989 – Public Hearing Comments

Dear Dr. Couch,

I am a resident of the city of Milton and I would like to express my concerns regarding NPDES Permit No. GA0038989. I respectfully request that EPD deny this permit.

This plant would discharge to the Etowah River which flows into Lake Allatoona. Sections of the Etowah River and Lake Allatoona are in violation of the Federal Clean Waters Act. The Georgia Water Quality Control Act declares that the water resources of the state shall be utilized prudently for the maximum benefit of the people. I do not feel that it is beneficial to the people of the Etowah River Watershed for EPD to seek back doors to open by looking at the entire basin to see if there is room for additional pollutants. We do not expect that EPD will cave to the special interest groups and allow further decline to our lake. **All Citizens deserve clean water as well as safe and healthy water related recreational opportunities,** – regardless of the level of pollution elsewhere in the basin. CCWSA currently holds permits with allocations totaling 11,096 pounds of phosphorus to be discharged each year from their existing wastewater treatment plants at Rose Creek and Fitzgerald. CCWSA should be held to higher standards of treatment which would allow portions of their existing allocation to be transferred for a new facility. **Additional allocations should not be granted for discharge to the Etowah River or Lake Allatoona.**

With Non-Point Source now reported to be 96.2% of the pollutants, How can EPD grant this permit which will allow an additional 81,750 lbs. of pollution to our watershed each year? The non-point pollutants cannot be ignored when considering this permit.

CCWSA reported 13 incidents of unpermitted discharge/spills to waters of the State in 2006, resulting in 186,000 gallons of raw sewerage dumped into our watershed with only 24,015 customers. This equates to 7.8 gallons of raw sewerage dumped into Lake Allatoona from each home connected to sewer. Until this record is improved, Cherokee Water & Sewer Authority should not be allowed any new treatment facilities.

A 2003 "State of the Lake" report warned that due to excessive pollution, Lake Allatoona could be on a path that is not conducive for economic stability for this region. Monitoring reports show that Chlorophyll A levels dramatically increased in 2007, far exceeding acceptable limits especially at the Etowah River, Little River, and Allatoona Creek. EPD should act to protect this vital natural resource. EPD should deny this permit and prevent further decline of Lake Allatoona. **Until the Total Maximum Daily Load's (TMDL) are finalized in 2009, how can EPD guarantee this discharge and the subsequent non-point pollutants will not destroy Lake Allatoona?**

No other aquatic region of North America has a higher percentage of endemic species than does the upper Coosa River basin. Fully 30 aquatic species of fishes, mussels, snails, and crayfishes call the streams within this system –and **nowhere else**—home. Encouraging high density development in an area that has been designated rural to the year 2030, will open the gates for more sediment to pour into our creeks, streams and the Etowah River. This permit will also enable heavily forested areas to be replaced with clear cut, heavily fertilized landscapes bringing more non-point source pollutants to our watershed. **Can you assure the people of the Coosa Basin that the 15 species currently listed as Federally Endangered or Federally Threatened, will survive with this added pollution?**

This permit should not be considered until such time as Lake Allatoona, the receiving body of water is no longer in violation of the Federal Clean Water Act. Thank you for your consideration.

Sincerely,

_____	_____
Signature	Signature
Print Name _____	Print Name_____
Street Address _____	Street Address _____
City _____Zip Code _____	City _____Zip Code _____