City of Olympia | Capital of Washington State
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SENT VIA EAGL

July 25, 2022

Washington State Department of Ecology
Attn. Ben Watson
Water Quality Program
PO Box 47775
Olympia, WA 98504-7775

Dear Mr. Watson:

Subject: **City of Olympia Review Comments for Draft Budd Inlet Total Maximum Daily Load for Dissolved Oxygen: Water Quality Improvement Report and Implementation Plan**

The City of Olympia has reviewed the draft Budd Inlet Total Maximum Daily Load (TMDL) for Dissolved Oxygen: Water Quality Improvement Report and Implementation Plan – June 2022 (Washington State Department of Ecology Publication No. 22-10-012).

We appreciate the opportunity to provide comments on this document. The City of Olympia is committed to working collaboratively with Ecology and others to address the low dissolved oxygen (DO) in Budd Inlet. The City of Olympia supports the development and implementation of meaningful and successful actions with measurable outcomes to eliminate sources of water quality degradation in regional surface waters and the Puget Sound. We strive to ensure our local waterways are clean and healthy. This water cleanup plan will help us to identify further actions in the watershed to help curb pollutant loads and enhance water quality.

Since the identification of Budd Inlet on the State's 303(d) list for low DO in 1998, the City of Olympia has implemented many pollution-reducing activities and projects in the Budd Inlet watershed. Some of these changes include regional stormwater facilities, stormwater treatment facilities, land use management practices, illicit discharge detection and elimination, and management decisions that have helped to reduce waste loads into local receiving waters. The City of Olympia has operated under a Municipal Separate Storm Sewer System (MS4) stormwater discharge permit since 2007. This permit has steadily increased management actions within the Budd Inlet and Deschutes TMDL basins. It's quite possible many of these management decisions and actions have already helped us meet the waste load allocations identified in the Budd Inlet TMDL.

There is still work to be done to reduce pollutant loading into Budd Inlet. Funding will be the primary limiting factor when it comes to project implementation. We would welcome and support any funding package(s) for approval by legislature to help water quality cleanup in Budd Inlet.

Thank you for considering our attached comments. If you have questions or need any additional information, please contact Olympia's Storm & Surface Water Quality Planner, Jeremy Graham, at jgraham@ci.olympia.wa.us or 360.753.8097.

Sincerely,

ERIC CHRISTENSEN
Water Resources Director
City of Olympia

EC/js

Enclosure: Budd Inlet TMDL – Comment and Questions Matrix

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cc: Jesse Barham, Environmental Services Supervisor
Jeremy Graham, Storm & Surface Water Quality Planner

Budd Inlet TMDL - Comment & Questions Matrix

Page Reference	Issue	Comment
General Comments		What regulatory mechanisms apply to the riparian and septic system actions? Municipal Stormwater permits do not appear to be applicable.
		Much of the developed areas within the City of Olympia's developed permit coverage area currently receives stormwater management (treatment). Has this been taken into account in the WLAs?
		How will the City determine if we are meeting the WLAs and progress that has already been made to date? Sampling would have to be extensive and/or many assumptions made on sources and reductions in a model or analysis. Can we assume that WLA monitoring required of the City of Olympia will have sampling locations and methodologies similar to those used to develop the TMDL? The City of Olympia has more than 100 stormwater outfalls discharging to Budd Inlet and Capitol Lake. Stormwater monitoring has the potential to be extremely expensive depending on the number of sampling locations and QA/QC requirements.
Pg 20	Loading Capacity 2nd paragraph – An annual average daily loading capacity is also included in.	This is an unfinished thought/sentence.
Pg 28 (Also Appendix E-24) Figure 5	Municipal stormwater permittees and permit coverages areas in Budd Inlet's contributing watersheds does not accurately depict Port of Olympia and Department of Enterprise Services coverages.	The Port of Olympia owns all of the Port Peninsula north of Corky Avenue and Market Street. The Department of Enterprise Services owns all of Heritage Park, Capitol Lake, and the entirety of Deschutes Parkway. The City of Olympia is concerned this may impact our WLAs. Maps shown in the document are incorrect in these areas.
Pg 63	Ecology's Riparian Buffer Width Map Link - Both the 100' and	Can the buffer colors be changed to differentiate the two separate buffer widths?

Page Reference	Issue	Comment
	75' buffer lines are the same green color.	
Pg 72	Olympia, City of – These figures are incorrect and need updating	Please revise the City of Olympia section to read: The Storm and Surface Water Utility maintains over 165 miles of underground pipe, over 7,600 storm drains, over 190 flow control facilities (stormwater ponds, etc.), and over 140 treatment facilities (manufactured structures, wetponds, etc.) that carry stormwater runoff from roads and rooftops to local streams and Budd Inlet. Stormwater runoff from approximately 267 acres within the City of Olympia is conveyed to the LOTT Clean Water Alliance's Budd Inlet Treatment Plant.
Pg 82-83 (And Table 38)	Septic Systems – Priority for systems w/in 100' of surface water. There is no mention of Percival/Black Lake and ditch in the bullets on pg. 83. Septics in lake basin may contribute N, P and C to Budd Inlet and Capitol Lake. Homeless encampments in Percival likely a nutrient source.	Consider inclusion of Percival Creek, Black Lake, and Black Lake Ditch in this section.
Pg 95	Septic Actions – *As of 2020, the Department of Ecology's Water Quality Combined Funding Program Estimates that replacing a residential septic system may cost up to $21,000 dollars. Adjusting for inflation, we estimate an average value of $23,500 to replace individual septic system.*	Please check with Thurston County Environmental Health regarding the replacement costs. The City of Olympia is being told of septic replacement costs in the range of $35,000 to $50,000. Could also contact local septic replacement businesses to get a median cost estimate based on market rate.

Page Reference	Issue	Comment
Pg 95	Puget Sound Stormwater Retrofit Report Cost Estimate Appendix A – link broken	Please provide the correct link.
Pg 96	Funding Opportunities	It should also be noted there is a high demand for grant funded projects in the South Sound and Puget Sound wide area with many competing agencies and non-profits with fewer resources available. There are high numbers of projects being proposed and few will be selected for funding. Because substantial dollar amounts will be necessary to implement these cleanup actions, the City of Olympia supports any request for a legislative funding package for the water quality cleanup of Budd Inlet.
Pg 103	Compliance with TMDL means all BMPs must be in place to address DO, pH, fine sediments, and temperature by end of 2040, w/ prioritized areas addressed by 2035.	We have some concern with the deadlines for completed actions based on the large amount of work already influenced by the City of Olympia's Municipal Stormwater Permit. Every permit version has a large number of requirements, deadlines, programs, and need for new staffing. Hard to know where all of the funding will come from, most of our ambient monitoring funding was shifted to help fund our Stormwater Action Monitoring (SAM) commitments. With deadlines required in the TMDL, it seems like a potential failure out the gate if proposing grant funding to pay for these major studies, monitoring, and retrofitting work. Suggest more flexibility in target dates for completing, based on funding availability? Will Ecology be proposing a package for legislature to pass that allows specific funding mechanisms for work associated with Budd Inlet TMDL cleanup?
Pg 104-105	*A monitoring program for evaluating progress is an important component of any implementation plan… Monitoring is required midway through the implementation process…*	We request that Ecology's Environmental Assessment Program (EAP) be identified in the document as the lead agency for monitoring assessment and data documentation management. The City of Olympia is willing and available to provide assistance in monitoring. We are able to provide data from our joint Ambient WQ monitoring program with Thurston County, Lacey, and Tumwater. Is the current ambient monitoring completed by our agencies adequate for meeting monitoring needs?