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RE: Comments on Budd Inlet Dissolved Oxygen TMDL

The Port of Olympia (the Port) appreciates the opportunity to comment on the draft Budd Inlet Dissolved Oxygen (DO) TMDL Water Quality Improvement Report and Implementation Plan.

Our vision is to be an environmentally sustainable Port for generations to come. We see our future, and the health of Budd Inlet, as intertwined. We believe our existing efforts, including our continuing work on the Budd Inlet sediment cleanup site, investment in our marine terminal stormwater treatment facility that consistently meets benchmarks, and the implementation of the proposed TMDL, are best considered as a holistic strategy to restore Budd Inlet.

We broadly support the implementation of the DO TMDL and will make every effort to meet the allocations assigned to the Port of Olympia's Cascade Pole, Swantown Boatyard, Marine Terminal and municipal stormwater permits. However, we do believe it is possible the current draft allocations may not be accurate, and we look forward to having a technical meeting with Ecology to address that issue before the TMDL is finalized.

Additionally, the TMDL Implementation Plan also identified several nonpoint source contributors to Budd Inlet's low DO levels. These include Capitol Lake, sediment accumulation, nutrient flows from the greater Puget Sound, and climate change, among others. We believe that addressing nonpoint sources is also critical to restoring DO levels in Budd Inlet.

Therefore, we would like to draw Ecology's attention specifically to the relevance of the Budd Inlet sediment site. We appreciate that the TMDL Implementation Plan generally acknowledges that there are several cleanup sites in Budd Inlet working within Ecology's Toxics Cleanup Program.

However, we believe that addressing sediment accumulation and the Budd Inlet sediment site has specific ramifications for DO levels. Sediment build-up reduces the flows and mixing of both fresh and marine waters, concentrating the contributors to low DO levels in Budd Inlet.

As sediment accumulates, organic carbon and other nutrients are also trapped in the sediments and contribute to low DO levels. *See* Dept. of Ecology, *Budd Inlet TMDL - Appendix D* (2021) at D-44. The sediment accumulation further depletes Oxygen levels by reintroducing nutrients into the water column when it is disturbed. *Id*. at D-43. The sediments in Budd Inlet may also contain unusually high levels of organic matter, posing a particularly acute risk to DO levels. *Id*. at D-47.

Therefore, we believe that addressing sediment accumulation, reducing loading from municipal stormwater, and remediation dredging currently being planned with Ecology is crucial to improving DO levels in Budd Inlet. As the Port moves forward with the Budd Inlet sediment site cleanup, we would like to continue to work collaboratively with Ecology to ensure that the cleanup not only addresses the historic dioxin contamination, but also improves DO levels.

Remediation dredging will be an important part of this strategy and greatly improve mixing of marine waters while removing organic carbon and nutrients within the sediment. This action is the first step to significantly help restore highly functioning habitat to Budd Inlet. The remediation dredging is particularly critical if either the estuary or hybrid alternative is selected for implementation based on the Draft EIS for the Capitol Lake-Deschutes Estuary Long Term Management Plan, both of which will increase sediment flows to Budd Inlet.

Thank you for the opportunity to provide comments on the proposed TMDL.

Respectfully,

Lisa Parks, Executive Services Director