



July 7, 2022

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

RE: Comments on the Draft Budd Inlet TMDL for Dissolved Oxygen  
LOTT Clean Water Alliance

Thank you for the opportunity to review the Draft Budd Inlet TMDL for Dissolved Oxygen: Water Quality Improvement Report and Implementation Plan. The LOTT Clean Water Alliance recognizes this is a major undertaking and reaching this milestone in the TMDL process is a significant accomplishment. We commend the Department of Ecology for all the work that has gone into the process thus far, especially the time taken to coordinate with key stakeholders to develop a realistic implementation plan.

In general, LOTT finds that the Draft Budd Inlet TMDL Report and Implementation Plan offers a reasonable and effective pathway to improve water quality in Budd Inlet. Successfully addressing sources of oxygen depletion and improving water quality in Budd Inlet is of great importance to LOTT and LOTT ratepayers.

LOTT has been providing nutrient removal for nearly 30 years at the Budd Inlet Treatment Plant (BITP), beginning in 1994. Since then, LOTT has maintained an excellent track record of complying with the most stringent nutrient discharge permit limits in Puget Sound. We are in the process of a major upgrade of the biological nutrient removal process, and initial performance of the new treatment trains is excellent. Across these two generations of nutrient removal upgrades, LOTT ratepayers will have invested over \$60 million to minimize water quality impacts to Budd Inlet and Puget Sound, maximize performance, and address capacity needs. While there are limits to how much more LOTT can reduce nutrients in the BITP discharge, we feel that the allocation outlined in the Draft TMDL is reasonable and achievable. LOTT is incorporating the discharge values outlined in the Draft TMDL into our master planning process currently underway.

We are encouraged that the Draft TMDL includes allocations and a pathway to address impairments resulting from Capitol Lake, non-point sources, and external sources to the north of Budd Inlet. Contributions from these sources are significantly higher than those from the Budd Inlet Treatment Plant. It is critically important that these sources address their contributions to Budd Inlet water quality impairment. LOTT is very aware of and concerned by the potential implication that our discharge into Budd Inlet could be jeopardized in the future by the inability of other sources to meet the allocations outlined for them in the Draft TMDL. LOTT is reaching the technological limit in our ability to further reduce nutrients in the BITP discharge. Further impact to BITP discharge would necessitate major system investments disproportional to the impact on Budd Inlet water quality.

Concerns aside, LOTT remains hopeful that entities that contribute to oxygen depletion in Budd Inlet will honor the allocations set forth in the TMDL, and water quality standards will be met as a result. The Draft TMDL Report and Implementation Plan offers a promising roadmap to meet our shared interest in the health of Budd Inlet and Puget Sound.

Again, thank you for the opportunity to comment.

On behalf of the LOTT Board of Directors,

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*Lisa Parshley*

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Lisa Parshley, Board President  
LOTT Clean Water Alliance