



COUNTY COMMISSIONERS

Cathy Wolfe
District One
Sandra Romero
District Two
Karen Valenzuela
District Three

BOARD OF COUNTY COMMISSIONERS

January 17, 2014

Lydia C. Wagner
Andrew Kolosseus
Water Cleanup Plan (TMDL) Coordinators
WA Department of Ecology
PO Box 47775
Olympia, WA 98504-7775

Subject: Deschutes River/Budd Inlet TMDL Completion Schedule

Dear Ms. Wagner and Mr. Kolosseus:

We understand that you are seeking input on options for revising the Deschutes River/Budd Inlet TMDL completion schedule. Specifically, the decision under discussion is whether to split the TMDL into a freshwater TMDL cleanup plan, with a “fast track” for completion, and a marine water TMDL cleanup plan that would take several more years to complete. As we understand the issue, Ecology has computer model information demonstrating that water quality violations in Budd Inlet are caused not only from pollution sources within the watershed, but also from pollution sources outside of the watershed and outside of Thurston County jurisdictions’ control. This means that Ecology will have to mandate that other counties, cities, and/or sewer utilities in Puget Sound take actions, such as nutrient removal at sewage treatment plants, to achieve water quality standards in Budd Inlet.

Thurston County agencies and citizens have been actively working to improve water quality in streams and South Puget Sound. The LOTT regional wastewater treatment facility has had nitrogen removal since the early 1990’s and been producing Class A reclaimed water since 2004. To further protect Budd Inlet, LOTT’s long-term strategy is to construct satellite treatment plants and use and/or infiltrate the reclaimed water produced into ground water at facilities upstream in the watershed rather than discharge directly to marine water. LOTT is currently undertaking a multi-million dollar study to ensure that infiltrating the reclaimed water does not have a negative impact on drinking water supplies and other water resources. With our partners, we are developing a regional strategy to convert onsite sewage systems to sewer where needed within the urban growth area, because we realize that converting some neighborhoods from onsite systems to sewer could remove thousands of pounds of nitrogen from an estimated 5.5 millions of gallons of sewage every day before it infiltrates ground water. That ground water provides the base flow for our streams, including the Deschutes River. Ecology data shows that the Deschutes River has the highest nitrogen concentration of all Puget Sound rivers.

We are not waiting to act. However, as your research shows, the Deschutes watershed and Thurston County residents cannot succeed alone. The Puget Sound Partnership's 2013 State of the Sound report says, "The largest driver of declining marine water quality has been increasing nitrate concentrations. Over the past 14 years, nitrate levels have increased steadily despite ocean variability." The water quality problems in Budd Inlet and Puget Sound are consequences of pollution throughout the region, and it is essential that everyone take action to significantly reduce their share of nitrogen pollution to South Puget Sound.

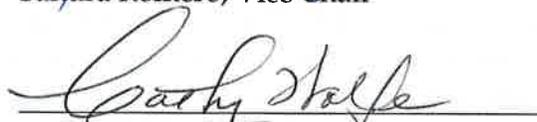
We request that Department of Ecology finish the Deschutes River/Budd Inlet TMDL as soon as possible for the entire watershed, both freshwater and marine. It is one integrally connected system with activities in one area affecting water quality in another. We expect that there will need to be pollution load reductions for unpermitted (nonpoint) as well as permitted (point) sources, and in the upland and along fresh water bodies and the marine water. To address the external loading sources, we suggest that Ecology set a nutrient load allocation in the TMDL for those external sources entering Budd Inlet and begin the necessary work with other South Sound jurisdictions to reduce their contribution.

This TMDL began in 2002, and Thurston County has been a committed participant in the process throughout. However, the longer the process takes, and the older the data that serves as the basis for action recommendations becomes, the less effective the TMDL will be. It is imperative that the process be completed, so that our watershed partners and we can direct our resources to on-the-ground water quality improvements.

Sincerely,


Karen Valenzuela, Chair


Sandra Romero, Vice Chair


Cathy Wolfe, Commissioner