



SKAGIT COUNTY PUBLIC WORKS DEPARTMENT

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November 20, 2020

Scott Bohling, Water Quality Specialist
Department of Ecology
3190 160th Avenue SE
Bellevue, WA 98008-5452

Re: Padilla Bay TMDL Comments

Dear Mr. Bohling,

The Natural Resources Division of Skagit County Public Works would like to thank the Department of Ecology for the opportunity to comment on the draft Padilla Bay Freshwater Tributaries Fecal Coliform Bacteria Total Maximum Daily Load Report (TMDL).

Skagit County's Pollution Identification and Correction (PIC) program has been active in the Padilla Bay Watershed since 2015 when Skagit County partnered with Ecology on hosting the Padilla Bay TMDL kickoff public meeting on October 1, 2015. At the beginning of the project, Ecology worked closely with Skagit County and SCD Storm/Stream Team citizen volunteers to incorporate existing data and use local knowledge to select sample sites. Unfortunately, ECY's communication of this TMDL effort dwindled to be almost nonexistent due to staff changes and a shift to other priority areas.

It was not until September of 2020 that Ecology again initiated active communication and outreach to Skagit County on this TMDL project. Skagit County agreed to review the TMDL and be part of the Technical Advisory Group. However, Skagit County is deeply concerned about the lack of involvement of the TAG before releasing the document for public review. There have only been two meetings of the TAG and those were primarily presentations from ECY staff and did not have sufficient time for technical review. In addition to the TAG only being provided the full document four working days prior to public release, neither Skagit County nor the TAG were provided an opportunity to review the "Eastern Padilla Bay Tributaries Fecal Coliform Bacteria Total Maximum Daily Load Study: Water Quality Study Findings" before it was used to develop the draft TMDL.

Unfortunately, the final draft TMDL that was shared with the public was not the best example that could have been presented. This TMDL could have been greatly improved and more accepted by the community if a more sincere effort had been made to work with the TAG to develop the plan. Unfortunately, the draft TMDL provided for public comment has a significant number of typos and technical errors that could have been corrected with an adequate review period.

The Washington Department of Ecology is an essential and outstanding partner in Skagit County's mission to reduce bacterial pollution in the Padilla Watershed. Skagit County encourages ECY to extend the review period for this TMDL, go back to the TAG to address technical concerns, and work with community stakeholders to improve the overall tone of this document so as to achieve better community acceptance of the plan.

If you have any questions about this letter or the attached spreadsheet of detailed comments, please feel free to contact me at (360) 416-1455 or email at michaels@co.skagit.wa.us.

Sincerely,

Michael See
Natural Resources Division Manager
Skagit County Public Works

Cc:

Dan Berentson, Public Works Director
Ralph Svrjcek, Washington Department of Ecology