



Skagit County Agricultural Advisory Board

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November 20, 2020

Scott Bohling
Washington State Department of Ecology
Water Quality Program
3190 160th Avenue SE
Bellevue WA 98008-5452

RE: Padilla Bay Tributaries Fecal Coliform Bacteria Total Maximum Daily Load Report Water Quality Improvement Report Publication 20-10-036

Mr. Bohling:

The Skagit County Agricultural Advisory Board has reviewed the proposed Padilla Bay Freshwater Tributaries Bacterial TMDL and would like your department to consider our comments on the proposal. Skagit County is heavily reliant on agriculture, so any changes in our farm economy affect the county and region as a whole. Proper drainage in the wet season and irrigation availability in the dry growing season are vital to maintain this economic engine for the county.

The Skagit County AAB is concerned that the drainage issues noted in the TMDL flow largely through agricultural areas. Our concern is those agricultural areas will be held to a higher standard on water quality than waters originating from upstream areas. This has the potential to allow poor water quality waters to flow into agricultural areas, thus relying on farmers to clean up water that did not originate on their farm. This potentially could put undue hardship on farmers who already comply with the directives required for water quality on their operation.

The TMDL also points out wild waterfowl as an issue with Fecal Coliform in the waters. Skagit County is in a major waterfowl migratory area with thousands of birds flying passing through and resting in the areas bays, rivers, ditches and agricultural fields. The birds leave their impact on each of these areas every time they frequent the area. The agricultural community has no control over the actions of wild animals or the footprint they leave behind. Analyzing farms for the impacts of migratory birds and wildlife is of little value.

Advisory Committee Members:

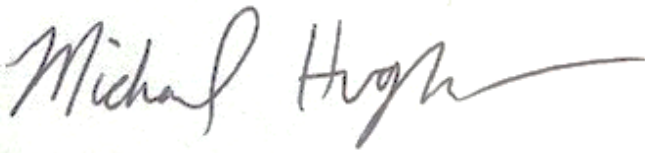
Michael Hughes (Chair), Nels Lagerlund (Vice Chair)

Murray Benjamin, Barbara Cleave, Justin Hayton, Kraig Knutzen, John Morrison, Steve Omdal,
Terry Sapp, Tim Van Hofwegen, Rachael Ward-Sparwasser, Steve Wright

The TMDL also points to recreational use as an important factor for water quality. Skagit County drainage is managed by local drainage and irrigation districts. These waters flow predominantly through private property therefore provide no access for recreational use. As these waters are not available for primary contact recreation, this standard would not apply to them.

The Agricultural Advisory Board agrees water standards are important in Skagit County and local farms make every effort to maintain good water quality for all. The AAB wants to ensure these efforts do not go unnoticed by the Department of Ecology. We ask you acknowledge water quality issues that start upstream of farm operations and by wildlife are outside of the respective farmer's control.

Respectfully,

A handwritten signature in black ink that reads "Michael Hughes". The signature is written in a cursive style with a long horizontal line extending to the right.

Michael Hughes
Chair, Skagit County Agricultural Advisory Board

CC: Skagit County Board of Commissioners
Peter Browning, Skagit County Commissioner-elect