

Washington State Department of Agriculture

The Washington Department of Agriculture's Dairy Nutrient Management Program recognizes Ecology's effort in developing the Drayton Harbor TMDL. However, if the work proceeds the TMDL should be based on current conditions in watersheds draining to Drayton Harbor, which have dramatically changed since Ecology's work was suspended. Since 2012, the community and partners in the Whatcom Clean Water Pollution Identification Correction program have addressed many of the issues that originally led to downgrading Drayton Harbor shellfish beds, which included finding and fixing failing septic issues, and addressing runoff from dairy and non-dairy sites. And while infrastructure and nutrient management has improved on dairies in the watersheds draining to Drayton Harbor, the number of dairies has also decreased from 11 in 2012 to five dairies in 2020. Accordingly, the number of mature dairy cows has decreased in that time from 7,000 to approximately 3,000. If the Drayton Harbor TMDL work proceeds, it should be based on current information. Thank you for the opportunity to comment.