

## George Boggs

Please take note that is is on behalf of the Whatcom Conservation District. (No option other than individual was available above.) It is our considered opinion that completing the Drayton Harbor Bacterial TMDL should not be a priority particularly if Ecology resources are limited (which we hear regularly is the case). I refer you to the stated objective of a TMDL (see clean water act). Namely, the objective of a TMDL is to determine the loading capacity of a waterbody and to allocate that load among different pollutant sources so that the appropriate control actions can be taken and water quality standards achieved. Since there is the absence of any permitted facility in the watershed, loads cannot be allocated. Rather, loading is due to a multitude of non-point sources. An effective plan has been developed by local agencies with input from community members to address those sources within our respective authorities and control. Extensive monitoring by Whatcom County and other Whatcom Clean Water Partners demonstrates this conclusion. It is, therefore unnecessary and a poor use of limited taxpayer funds to revisit source identification and what solutions should be brought to bear. Additionally, the Whatcom Conservation District does not have the discretionary resources to contribute to the development of a TMDL or later, reporting on its activities. Other agencies addressing bacterial pollution can speak for themselves, however they appear limited in this regard as well. Thank you in advance for your anticipated kind consideration of our comments.