



CITY OF BLAINE
PUBLIC WORKS DEPARTMENT
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Date:

September 25, 2025

To:

James Kardouni
Washington Department of Ecology
Water Quality Program
913 Squalicum Way #101
Bellingham, WA 98225

Subject:

Comments on the Drayton Harbor Bacteria Total Maximum Daily Load (TMDL) Draft Report (Publication 25-10-060)

Dear Mr. Kardouni

On behalf of the City of Blaine, we appreciate the opportunity to comment on the Drayton Harbor Bacteria Total Maximum Daily Load (TMDL) Draft, published in August 2025. This letter provides formal comments on the Drayton Harbor Bacteria Total Maximum Daily Load (TMDL) Draft Report, specifically focusing on the assessment of the City of Blaine's Lighthouse Point Water Reclamation Facility (LPWRF) and stormwater regulation applicability. The comments identify technical and regulatory flaws that may affect the accuracy, fairness, and feasibility of the proposed implementation plan.

A. Flawed Assessment of Blaine's Wastewater Treatment Plant

The LPWRF uses a membrane bioreactor (MBR) system and produces Class A reclaimed water, as defined under WAC 173-219. This water meets stringent standards for reuse and is not expected to contribute to Fecal Coliform (FC) pollution under normal operating conditions. While the report acknowledges that LPWRF loading is minimal, it still implies that the facility contributes to elevated fecal coliform levels at marine sampling stations 8 and 15 without presenting any data on effluent violations to support this claim. The LPWRF is flagged based on proximity to sampling stations, without any tracer studies performed to confirm pollutant transport. This approach lacks scientific rigor and ignores dilution and mixing zone dynamics.

The report recommends dual monitoring for enterococci and fecal coliform without presenting historical data or risk-based justification for this additional monitoring requirement for LHPWRF.

B. Misrepresentation of Stormwater Regulatory Applicability to the City of Blaine

The City of Blaine, under 40 CFR § 122.26(b)(4) and (7), is exempt from Phase II Municipal Separate Storm Sewer System (MS4) permit requirements. Despite acknowledging Blaine's non-permitted status, the report recommends actions typically required under Phase II MS4 permits, such as "screening MS4 infrastructure" and "connecting On-site Sewage Systems (OSS) to Wastewater Treatment Plan" for the implementation, which can be misinterpreted as regulatory obligations.

The City of Blaine's stormwater runoff is assigned Load Allocations based on assumptions without any site-specific monitoring data, infrastructure mapping, or calibrated model, as the Cain Creek subbasin does not have a gage station to form the basis of the streamflow model. The use of the Simple Method to calculate FC bacteria loading requires seasonal precipitation total and impervious fraction of land cover, both of which were assumed for Cain Creek, and it may overestimate Blaine's contribution.

The report provides detailed subbasin delineations showing that California Creek (37%) and Dakota Creek (49%) comprise the majority of the watershed, while Cain Creek (2%) - which includes Blaine - is relatively small. Yet, Blaine's contribution is not quantitatively compared to these larger subbasins in terms of actual bacterial loading.

The report presents seasonal bacteria loading comparisons for California and Dakota Creeks, showing significantly higher loading rates than Cain Creek. However, Blaine's stormwater is not separately quantified or modeled, and its contribution is not compared to these dominant sources.

C. Incomplete Assessment of Wildlife Fecal Contamination

According to the 2006 Shoreline Surveys of Drayton Harbor Shellfish growing area, bird densities exceeded 1,000 birds/km² in the marina area during winter and summer. Gulls, cormorants, and pigeons were the most common species observed, all known to contribute high levels of fecal bacteria in marine environments. The report acknowledges that birds, seals, and other wildlife may contribute to fecal coliform pollution in Drayton Harbor, especially near the Blaine Marina. However, this is not integrated into the core pollution source analysis.

The study includes microbial source tracking (MST) to identify human biomarkers in Cain Creek. However, despite their known presence and density in the marina, it does not

present MST results for avian sources. Without MST data for birds, attributing elevated FC levels at marine stations 8 and 15 to human sources (e.g., Wastewater Treatment Plants) is speculative and potentially misleading.

By failing to assess wildlife contributions adequately, the study may misallocate pollution control efforts toward human infrastructure (e.g., Wastewater Treatment Plant upgrades or OSS inspections) while neglecting nonpoint wildlife sources. This could result in inefficient use of resources and delayed attainment of water quality standards.

We respectfully request that the Department of Ecology:

- Clearly distinguish Blaine's regulatory status and provide voluntary compliance pathways tailored to Blaine's size and capacity.
- Reassess the LPWRF's role using effluent data and hydrodynamic modeling.
- Recognize the advanced treatment technology and reclaimed water standards in evaluating LPWRF impact.
- Incorporate wildlife source tracking and correlation analysis for avian fecal contamination.

We believe these comments will assist the Department of Ecology in developing a comprehensive and robust final document. We appreciate the opportunity to provide input and look forward to continued collaboration to improve water quality in Drayton Harbor.

Sincerely,



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