



Drayton WID Directors

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September 18, 2025

RE: Request for Public Comments on the Drayton Harbor Bacteria TMDL Draft (Publication 25-10-060)

The Drayton Watershed Improvement District (DWID) appreciates the opportunity to provide comments on the Drayton Harbor Bacterial TMDL. DWID was formed in 2014 under RCW 87.03 to provide support to landowners and assist in management of efforts related to water supply, water quality, and drainage on agricultural lands in the district, and works with the Ag Water Board to coordinate their efforts with those of other WIDs in Whatcom County.

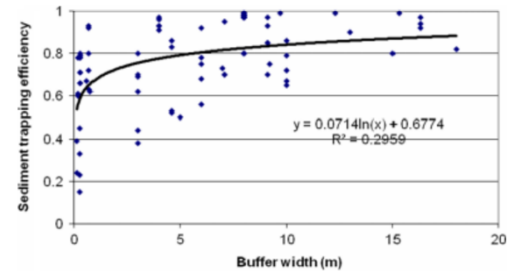
DWID shares the desire to improve water quality throughout the Drayton Harbor watershed, but notes a few concerns with some comments and recommendations included in the implementation plan for the TMDL as it relates to agricultural lands within the district.

On page 81, the draft states “To attain the TMDL, reductions in fecal bacteria pollution to the receiving water bodies from upland agricultural areas are needed in multiple areas of the watershed.” Water quality data shared by the Whatcom Conservation District, in partnership with the Whatcom Clean Water Project, is reviewed by the DWID board at regular monthly meetings, and over the past years has indicated a consistent trend of improved fecal coliform counts, with occasional high counts coming from areas with no known connection to animal agriculture outside the boundaries of the district. The work of the district and farmers in increasing BMP adoption, along with reductions in the number of dairy operations in the district due to agricultural economic impacts, are likely contributing factors to these improvements. The use of this language in the draft suggests the existence of a significant water quality problem due to agricultural activities, but the data does not support this claim. DWID suggests the above-mentioned phrase is adjusted to read “Reductions in fecal bacteria pollution to the receiving water bodies from upland agricultural areas throughout the watershed can aid in attaining the TMDL.”

On a related note, page 70 of the draft states that “... farmed wetlands can continue to provide important wetland functions such as waterfowl migration and overwintering areas.” Our farmers throughout Whatcom County take great pride in the migratory and overwintering habitat that their fields provide to tens of thousands of ducks, geese, and swans each year. However, it is important to note that the presence of these waterfowl in large numbers occurs during a time of year when aquifers are full and soil moisture levels are high, leading to increased levels of surface runoff in precipitation events. Because of this, farmers are restricted or prohibited from most activities in their fields during this time. Despite these restrictions, waterfowl waste can and often does cause high fecal coliform counts. Historically, these high counts have often been unfairly blamed on farmers.

Recent developments in DNA testing and analysis, which DWID was proud to partially fund, have allowed for effective, low-cost DNA analysis of fecal coliform samples. This technology has been used throughout Whatcom County to distinguish between avian and bovine sources of fecal coliform to guide responses to high counts. As such, DWID recommends that the list of Source Identification and Tracking actions on page 62 of the plan explicitly list DNA analysis as a tool for identification of bacteria pollution sources.

Finally, DWID has significant concerns about the language and recommendations around riparian buffers on agricultural lands on pages 82-83. The use of vegetated buffer strips, including riparian forest buffers, to capture sediment and sediment-bound bacteria is a broadly effective BMP, but site potential tree height riparian buffers are excessive for these purposes, especially on very low slopes such as those found throughout farmland in the district. Implementation of site potential tree height buffers would take over 40% of lands in the district out of production, and the resulting impacts to agricultural viability would directly lead to increased urban, suburban, and industrial development of those lands, which would have a net negative effect on water quality in the watershed. As shown in the above graph¹, the majority of a buffer's effectiveness in trapping pollutants can be achieved with a width of 12-16 feet. These types of practices are also much more likely to be adopted by landowners. DWID strongly recommends the TMDL include the use of smaller vegetated buffer strips (often referred to as "hedgerows") as a suggested best management practice in areas where large riparian buffers are not feasible.



Thank you for considering these comments. If you have any questions or wish to discuss the comments further, please reach out by email to gavin@agwaterboard.com.

On Behalf of the Board of Directors,

Gavin Willis
Administrator, Drayton Watershed Improvement District
Executive Director, Ag Water Board of Whatcom County

¹ Graph taken from Yuan *et al.* 2009. *A Review of effectiveness of vegetative buffers on sediment trapping in agricultural areas.* *Ecohydrol.* 2, 321-336.