

Erin Hallenburg

The Drayton Harbor Bacteria Total Maximum Daily Load (TMDL) Draft Report (REPORT) appears to be a thorough study that identifies several contributors to poor water quality. Below are some comments and/or food-for-thought on the next steps.

The REPORT states the marine and fresh water interface, "pollution reductions range from 61-99 percent, protecting shellfish harvesting. Pollution reductions necessary to protect fresh water contact recreation range from 0-90 percent." While the reductions for shellfish harvesting are specific, the range of 0-90% for 'recreation' is non-specific and provides a softball goal.

The REPORT states the "highest FC counts and loads occurred during the early November first flush storm event in the upper California Creek basin approximately 50 percent of the total FC load originated within this reach..." And "During the dry season, over 90 percent of the total FC load originated within this reach... Stormwater runoff contaminated with FC is a likely source." Reducing these agricultural and residential sources will take a multifaceted approach. Agricultural sources are mainly independent farmers. Education, discussions, and funding will be needed to implement source control, such as detention basins, peat-bog reduction cells, etc.

Residential source reductions measures that span Whatcom County, City of Blaine, Custer, etc. need to be consistent and universal. I was involved in several Sewer System Evaluation Surveys (SSES) which were very effective separating Storm from Sanitary sewers. Especially with the recent UGA land switch and the planned growth within this watershed, existing septic tank inspections and a banned on future septic tanks is probably the biggest bang-for-the buck.

Thanks for your excellent report and I hope for our communities, we can remediate this annual occurrence with economic and science-based solutions.

Erin Hallenburg, P.E., QEP