



Northwest Office
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November 22, 2017

RE: New rule - Chapter 173-228 WAC, Vessel Sewage No Discharge Zones

Dear Department of Ecology,

Defenders of Wildlife (Defenders) supports the Department of Ecology's new rule, Vessel Sewage No Discharge Zone, Chapter 173-228 WAC. This rule will establish a Puget Sound No Discharge Zone, which would prohibit the release of sewage (black water) from vessels, whether treated or not.

Defenders is a national non-profit conservation organization with more than 1,200,000 members and supporters and is dedicated to the protection of native wild animals and plants in their natural communities. With more than 24,000 members and supporters here in Washington State, Defenders is actively engaged in numerous wildlife issues in the state, including the recovery of the critically endangered Southern Resident orca who visit the Salish Sea, which includes Puget Sound, every year during summer and fall.

Puget Sound is the largest estuary in the nation, by volume of water, and among the most beautiful. It is an economic driver for the entire region that supports tribal, sport and commercial salmon fisheries, crabbing, oyster farms, trade, recreation-based industry, and a thriving tourism industry. The Sound is the source of many livelihoods and the backbone of the local economy.

Puget Sound is also a cultural icon. First Nations have sustained their culture along the Salish Sea's coastline for centuries. The region is also home to majestic wildlife like the critically endangered Southern Resident orcas. It is truly an American treasure. But this remarkable place is in trouble.

For too many years we have burdened this important resource with excessive pollution, waste and garbage. And, because of its unique geography of fjords and islands, flushing out hazardous chemicals and contaminants occurs at a slower rate, or in some parts of the estuary, not at all. The 76 remaining Southern Resident orcas are already exposed to high levels of pollutants and contaminants. The National Marine Fisheries Service lists "Pollution/Contamination" as a major barrier to Southern Resident orca recovery (January 2008).

Eliminating further exposure to sewage waste pollution by enacting a No Discharge Zone is a straightforward solution for Southern Resident orcas because it does not require a major behavior change. Over 97% of boaters already store their sewage onboard and use any of the 100 pumpout facilities that exist around Puget Sound and the Straits of Georgia and Juan de Fuca. All sources of pollution should be controlled, and this is a common-sense action that reflects the value of Puget Sound.

Over 90 No Discharge Zones have been designated across the United States. To date EPA Region 10 (the Pacific NW) is the only region in the nation that has not designated No Discharge Zones for any

waters. Puget Sound, a national treasure, needs this type of protection. We fully support designating Puget Sound as a No Discharge Zone. This is one positive step the state can take toward addressing the problems of pollution and contamination that are impacting orcas, other wildlife and the health of Puget Sound. If you have any questions, please don't hesitate to contact me.

Sincerely,



Robb Krehbiel
Northwest Representative

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