



# PUGET SOUND PARTNERSHIP

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November 20, 2017

Ms. Amy Jankowiak  
Department of Ecology  
Water Quality Program  
3190 - 160th AVE SE  
Bellevue, WA 98008-5452

RE: Comment on Rulemaking for Puget Sound No Discharge Zone (Chapter 173-228 WAC)

Dear Ms. Jankowiak,

On behalf of the Puget Sound Partnership's Ecosystem Coordination Board, I'm writing to express the Board's support for the Department of Ecology's proposed rule (Chapter 173-228 WAC) to establish a vessel sewage No Discharge Zone (NDZ) in Puget Sound.

Sewage discharges, even by a small number of vessels in small quantities, can cause pollution that may be a problem for sensitive resources, such as swimming beaches and shellfish beds. Restoring and re-opening shellfish beds is one of the three Strategic Initiatives in the 2016 Action Agenda, our region's shared roadmap to protect and restore Puget Sound. Establishing an NDZ in Puget Sound is also a Near-Term Action in the 2016 Action Agenda, which further establishes its significance in context of the Puget Sound recovery effort.

The Ecosystem Coordination Board's members include representatives of business, environmental organizations, Tribes, all levels of government, local watershed groups, and others. Although the Board's business caucus has expressed concerns about the costs of retrofitting commercial vessels to comply with a Puget Sound-wide NDZ, we note that the State plans to use a phased approach to implementation to help mitigate these effects. Additionally, studies completed during previous phases of this rulemaking process demonstrate that stationary and mobile pump-outs available to recreational vessels in Puget Sound far exceed the criteria for designation of an NDZ.

Thank you for your attention to this matter, and your continued leadership in protecting and restoring Puget Sound. If you have any questions about the Board's support of the Department of Ecology's proposed rule, please do not hesitate to contact me at (206) 373-1630 or [whall@shorelinewa.gov](mailto:whall@shorelinewa.gov).

Sincerely,

Will Hall  
Chair, Ecosystem Coordination Board

cc: Ecosystem Coordination Board members  
Sheida Sahandy, Director, Puget Sound Partnership  
Jay Manning, Chair, Puget Sound Partnership Leadership Council