

November 27, 2017

Ms. Amy Jankowiak
WA Department of Ecology
Northwest Regional Office
3190 160th Ave SE
Bellevue, WA 98008
amy.jankowiak@ecy.wa.gov



Dear Ms. Jankowiak,

On behalf of the Pacific Coast Shellfish Growers Association (PCSGA), I am writing to express support for proposed rule language establishing a Vessel Sewage No Discharge Zone (NDZ) in Puget Sound. PCSGA, founded in 1930, represents over 100 shellfish companies in Alaska, Washington, Oregon, California, and Hawaii. The majority of our members operate in Washington, producing an estimated value of over \$184 million. While producing healthful, sustainable oysters, clams, mussels and geoduck, our members are active stewards of the marine environment.

Shellfish farming can only take place in the cleanest waters that have been certified under the National Shellfish Sanitation Program (NSSP), a stringent set of standards operated under the Food and Drug Administration. These standards include monitoring for fecal coliform bacteria, Vibrios, harmful algal toxins, heavy metals and other contaminants. The NSSP standards led to the first estuarine/marine monitoring programs, and are the most stringent of all water quality classifications, far exceeding those required for swimming. Regular monitoring is required to maintain certification of shellfish beds, and harvesting is banned if a problem is detected. These bans remain in effect until the problem is corrected and water quality monitoring indicates the area once again meets standards.

Most closures to shellfish areas come after significant rainfall events and in some cases and places may be predicted with the help of an accurate weather forecast. When a closure comes from an isolated discharge of human waste, such as from a vessel, there is no warning and the impact can be significant. According to the Center for Disease Control, as few as 18 virus particles can make a person sick. Human vomit releases billions of virus particles which can last in the environment well past exposure. Since oysters filter 40 gallons of water per day, the risk of picking up viruses is unfortunately pretty high, regardless of where it was released.

Nationally, we are starting to see shellfish-related illnesses associated with viruses and certain bacteria not typically treated in neither shore-side wastewater treatment facilities nor marine sanitation devices (MSDs). There were a couple events in the Gulf Coast during the late 1990's and more recently in Tomales Bay, CA, Samish Bay, WA, and Wellfleet, MA – all of which were related to norovirus. While the number of these instances remains small at this point, there is a concern that occurrences of such illnesses could increase in the future. There is a national education effort about viral contamination of marine waters and locally the industry is

addressing the situation by providing and maintaining porta-potties at beach access points and “lugga-loos” aboard vessels.

Norovirus presents a known risk. However, the data on the ability of Marine Sanitation Devices (MSDs) to treat viruses, in particular norovirus, is inconclusive. In absence of the current technology’s ability to treat for norovirus, a NDZ for Puget Sound, is the only responsible option. PCSGA supports a NDZ designation for Puget Sound, which was identified as a task in the WA Shellfish Initiative. Knowingly releasing human waste into Puget Sound and risking the health of the state’s natural resources should not be allowed.

I believe that the proposed rule which establishes a NDZ reflects PCSGA’s request for a phasing period which addresses the financial impact to commercial operators. Additionally, PCSGA strongly encourages the Department of Ecology to follow through with the rigorous public education program to support this important designation.

Thank you very much for your consideration of PCSGA’s input and for all you do to support Washington’s shellfish industry. I would be very happy to discuss this with you further and share specific ideas on how Ecology may want to move forward. I can best be reached at 360-754-2744.

Respectfully,

A handwritten signature in black ink, appearing to read "Margaret P. Barrette". The signature is fluid and cursive, with the first name being the most prominent.

Margaret P. Barrette
Executive Director