



SCHOOL OF VETERINARY MEDICINE
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November 9, 2017

Dr. Amy Jankowiak
Washington State Department of Ecology
3190 160th Ave SE
Bellevue, WA 98008-5452

Dear Dr. Jankowiak,

I am writing in support of the Department of Ecology's proposed new rule, Chapter 173-228 WAC – Vessel Sewage No Discharge Zones, to establish a Puget Sound No Discharge Zone and clarify requirements needed to implement the No Discharge Zone determination by the EPA earlier this year. It is my understanding that this rule change would prohibit the release of sewage from vessels, even if it were treated and will cover 2,300 square miles of inland marine waters. It is also my understanding that during this process the EPA determined that this region has adequate facilities for the proper removal and treatment of sewage from all vessels.

I am the Science Director for the SeaDoc Society, a marine science conservation program of the UC Davis Wildlife Health Center. We have been working on the science needed to design a health Puget Sound and Salish Sea for over 15 years. Science and monitoring efforts underway in Washington State demonstrate that over 41,000 acres of shellfish harvesting areas are classified as prohibited due to the proximity of pollution sources or poor water quality. High levels of human feces, or more specifically bacteria associated with human feces (fecal coliforms), are an important contributor to causing many shellfish closures. The presence of high levels of human feces not only closes these areas to recreational and commercial harvest but also diminishes local food gathering and economic opportunities for the residents of Puget Sound. Furthermore, human feces have been suggested as a source for the spread of drug-resistant bacteria from humans to wildlife, including southern resident killer whales.

There is no debating that human feces are something we have been and should be working very hard to get out of the marine ecosystem, for many reasons. It seems that with adequate facilities for the proper disposal and treatment of sewage from boats, we should be doing everything we can do to prohibit the discharge of feces from recreational and commercial boats. It will help protect human health and human wellbeing, our economy as it is associated with shellfish aquaculture and harvest, and the marine wildlife we all enjoy.

As a science program that has been studying water quality, public health, and marine mammal health for over 15 years, we strongly support proposed new rule, Chapter 173-228 WAC – Vessel Sewage No Discharge Zones.

Sincerely,

A handwritten signature in black ink that reads "J. K. Gaydos".

Joseph K. Gaydos, VMD, PhD
SeaDoc Society Science Director and Wildlife Veterinarian