



STATE OF WASHINGTON  
DEPARTMENT OF HEALTH

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November 17, 2017

Amy Jankowiak  
Water Quality Program  
Washington State Department of Ecology  
3190 – 160<sup>th</sup> Avenue, SE  
Bellevue, Washington 98008-5452

Dear Ms. Jankowiak:

The Washington State Department of Health supports Ecology's rulemaking designating the waters of Puget Sound a No Discharge Zone (NDZ). Pathogenic bacteria and viruses in wastewater discharges have the potential to impact bathers and consumers of shellfish. The implementation of the NDZ will result in the protection of public health for shellfish consumers and recreational water users by reducing under-treated wastewater discharges from vessels travelling along Puget Sound. As the Food and Drug Administration's designated shellfish authority in Washington State, we have concluded that implementation of this act will protect and improve marine water quality, and thereby allow additional safe commercial and recreational shellfish harvesting opportunities.

The Department of Health shellfish program evaluates and classifies all shellfish harvesting locations for a commercial shellfish industry supporting thousands of jobs and providing an approximate \$200 million economic benefit, and supplying Puget Sound shellfish to consumers worldwide. We also monitor the public health risk on over 250 publicly-owned recreational shellfish beaches. We close commercial and recreational harvesting in areas when pollution threatens public health. Currently, there are nearly 3,000 acres in Puget Sound closed due to potential pollution from marinas and boat moorage.

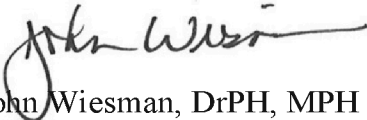
The implementation of the NDZ will lead to the re-evaluation of 36 marina and boat moorage areas, upgrading the classification within portions of these areas. Evaluations will be based on updated survey information showing improved waste-holding capacity in vessels, the increase in boat waste pump-out stations, and the implementation of the NDZ. Each of these factors results in improved water quality and a lowered risk to shellfish consumers. Preliminary modeling shows we may be able to remove harvest restrictions on just over 1,000 acres, approximately one-third of the currently closed area. Further water quality and shoreline pollution source analysis will be completed in these areas to determine the total acres that will be open for harvest.

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We believe Ecology has led a thorough research and stakeholder process to support this rulemaking. The Department of Health supports the conclusions and find that implementation of the NDZ will lead to increased public health protection through improved marine water quality and will allow additional recreational and commercial shellfish harvesting opportunities.

Please contact Rick Porso, Director of the Office of Environmental Health & Safety, if you need additional information or clarification about the improvements we will see after the implementation of the petition. He can be reached at [Rick.Porso@doh.wa.gov](mailto:Rick.Porso@doh.wa.gov) or 360.236.3302.

Sincerely,



John Wiesman, DrPH, MPH  
Secretary of Health

cc: Rick Porso, Department of Health