

Draper Machine Works Inc.

Please find my letter requesting rejection of the No Discharge Zone proposal.

This proposal is redundant and will add another layer of costs, harm a \$4 billion recreational boating industry, and not address the real problems of runoff, Septic system failure, and protected mammals that contribute significant un-treated contaminants into the receiving waters.

A better solution is to create open season on marine mammals in specific zones of shellfish production and fish spawning grounds, and to allow treatment plants on boats that render any effluent sterile and thereby eliminating any ecological affects.

Charles Draper Jr.

November 28, 2017

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

Re: No Discharge Zone – Please REJECT

Thank you for your evaluation of the Puget Sound as a No Discharge Zone.

Puget Sound **should not** join 90 other waterways across the United States as a No Discharge Zone. The Puget Sound Basin is not a waterway and is different than the other 90 “waterways” across the United States that were a result of the equal footings doctrine.

Some people are trying to lie to the public about Washington being “the only one in the nation that has not designated No Discharge Zones for any waters”. For example the Lake Washington Federal Ship Canal already has no Discharge requirements. Puget Sound is a national treasure and over 97 % of the boaters already control their sewage waste. Creating over regulation to try and catch the 3% that already disregard the current discharge law will not change anything except to add more costs to the residents in Washington State for more oversight.

I DO NOT support the Department of Ecology’s determination and proposal to establish the Puget Sound No Discharge Zone beyond the current already implemented laws.

The proposal is not a simple and common sense approach that will improve important shellfish harvesting areas. The most important issues with shellfish are septic systems, runoff and sea mammals, not the already treated sewage from boaters. I have certified shellfish beds for oyster and clam production and am familiar with the issues.

As has been stated, over 97% of boaters already do the right thing – they have holding tanks onboard to store sewage or have portable treatment systems that renders any sewage discharge sterile thereby eliminating a contamination issue. If the Dept of Ecology was concerned about POOP in the water, it would go after some of the laws that protect sea otters, sea lions and seals in specific areas and that create significant non-treated sewage in the water and shellfish beds.

I, along with thousands of residents and users of Puget Sound, strongly **do not** support establishing another No Discharge Zone Layer for Puget Sound. The maritime community values Puget Sound and I am confident that implementing another Discharge layer will adversely affect the maritime community. The addition of another layer of redundant laws will adversely affect the \$4 billion dollar recreational boating industry, not to mention the commercial fisheries within the Puget Sound basin including the tribes.

Again, thank you for reviewing the potentials of revisions however I and thousands of others in Washington State are totally against an additional layer named as a No Discharge Zone.

Please Do Not establish the Puget Sound No Discharge Zone.

Respectfully,

Charles Draper Jr.

President

Draper Machine Works Inc.