

## Boyer Towing, Inc.

In addition to my oral comments at the November 15, 2017 Public Hearing, wherein I pointed out the unconstitutionality of the proposed No Drop Zone Rule, I have the following comments. While Ecology has had several Public Meetings and knows how many recreational vessels and commercial vessels are on Puget Sound, it has not presented a proper scientific foundation.

Where is the scientific study showing that you tracked the raw sewage pumped directly into the Straits of Juan de Fuca at Victoria, B.C. to see how much reaches Puget Sound as the waters mix and mingle? How can you stop that?

Where is the scientific study showing that you tracked the Fraser River Spring Runoff into the Straits of Georgia to see how that affects Puget Sound Waters?

Where is the scientific study showing that treated sewage is the cause of the problem when in fact in 2016 the U.S. EPA put out information of the total Salish Sea, of which Puget Sound is a part, that it is unknown if man is the cause of the Problem?

Where is the scientific study showing that all of the sewage treatment plants will no longer be allowed to release treated sewage into Puget Sound? What will these plants do with the treated sewage?

Where is the scientific study showing what effect this will have on interstate shipping? How can you justify the extreme burden this will place on interstate commerce, which is prohibited by several U. S. Supreme Court cases?

Where is the scientific study showing the effect this will have on international shipping?

How many millions of dollars have you allotted for compensation for what will amount to a "taking" contained in the of the 5th Amendment clause to the U.S. Constitution, which requires that the government agency taking property must compensate the owner, because individuals and companies are put out of business as it is impossible for them to comply? Has the Washington State Legislature been made aware of this potential expenditure?

Lacking all of these scientific facts, this proposal has no scientific basis. It may make Ecology "feel good" when there is no proof that a No Drop Zone will do anything other than ruin interstate commerce, affect international traffic and inconvenience owners of boats. This is an exercise in futility and should be cancelled.