

Alliance for a Healthy South Sound

The Alliance for a Healthy South Sound Comment Letter in response to the Rulemaking - Chapter 173-228 WAC. Vessel Sewage No Discharge Zone is attached.



November 30, 2017

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

Dear Ms. Jankowiak:

The Alliance for Healthy South Sound is a collaboration between Thurston, Pierce, and Mason Counties, the Squaxin Island Tribe, and the Nisqually Tribe. We are writing to express our support for the concept of a no discharge zone for vessels in Puget Sound and our concerns about implementation of the proposal.

Support for no discharge zone. South Puget Sound is home to significant commercial, recreational, and tribal shellfish resources. Counties, cities, and tribal governments in South Puget Sound have invested considerably in protection and restoration of water quality and habitat necessary to protect and sustain healthy shellfish and will continue to do so. We welcome the additional protection that a no discharge zone for vessels will provide.

Implementation concerns. We have practical concerns about implementation of the No Discharge Zone (NDZ) and whether it will have the effect on water quality that is desired. First, we believe that the number of pump-out stations in South Puget Sound, maintenance and distribution, are not adequate to the vessel traffic we see. Current information on pump-out capacity notes 10 vessel pump out locations in South Puget Sound; however, our experience is that these locations are not practically available to boaters because several sites have limitations, design flaws and are often out of service.

We are also concerned that the distribution of existing facilities is not a good match for use patterns in the South Sound. Many of the destinations in the South Sound require alternative pump-out facilities. Areas such as Filucy Bay, Oro Bay and Cutt's Island (Kopachuck State Park) are destination boating areas, but currently no alternative facilities are available for boaters that frequent these sites. The South Sound is seeing increasing amounts of day-use by smaller vessels and kayaks, with users availing themselves of the state parks and other day and overnight use areas. Without adequate shore-based sanitation facilities for these users, we will continue to see water quality impacts from these users.

We suggest that implementation should include an ongoing effort to verify the continued availability of the pump out facilities relied upon in the rulemaking effort, to identify gaps in service areas, and to support construction and maintenance of additional facilities focusing on areas of impact that require alternative pump-out solutions. These could include: floating pump-out station, seasonal mobile pump-out services, floating toilets, and composting toilets on shore.



Thank you very much for your consideration of these comments. If you have any questions or require more information, please be in touch with Elizabeth McManus (emcmanus@rossstrategic.com or 206-890-9286).

We look forward to working with you to achieve water quality improvements in the South Sound.

Respectfully,

Jeff Dickison, Alliance for a Healthy South Sound Chair