



November 16, 2017

Amy Jankowiak
Department of Ecology, NW Regional Office
Water Quality Program
3190 160th Ave. SE
Bellevue, WA 98008

Re: Comments on Proposed Chapter 173-228 WAC Vessel Sewage No Discharge Zone

Dear Ms Jankowiak:

This letter is to express the support of Taylor Shellfish Farms for designation of the Puget Sound as a No Discharge Zone (proposed Chapter 173-228 WAC).

Taylor Shellfish has oyster, clam and mussel farms throughout Puget Sound. We and other shellfish growers in the Sound rely on clean water to grow shellfish that is safe to consume. To ensure this, Washington's Department of Health manages an outstanding shellfish sanitation program that includes routine water quality sampling on our shellfish farms and periodic screening for potential pollution sources.

Despite Washington's outstanding program we live in fear of discharge of raw or inadequately treated sewage from passing boats. These discharges would likely go undetected by current DOH monitoring. We know from norovirus outbreaks in Washington and elsewhere around the country that hundreds of people can be made ill from waste from one sick individual and that large areas can be contaminated with a relatively small amount of sewage. This rule significantly reduces this risk.

Many of the smaller recreational vessels frequenting our shellfish growing areas may not have any toilet facilities. We are hopeful, the extensive public education that will accompany the NDZ designation will help inform owners of these smaller vessels of the harm that comes from overboard discharge of sewage.

As a business, we are sympathetic to the concerns raised by the tug and commercial vessel operators about the cost and practicality of making necessary modifications to their vessels and availability of pumpouts for commercial vessels. We appreciate Ecology listening to these concerns and extending the time period for the requirements to be phased in and securing funding for additional commercial pumpouts.

Sincerely,

Bill Dewey
Director of Public Affairs