



PORT OF BELLINGHAM

Washington State

April 15, 2021

James Hovis
Washington State Department of Ecology
PO Box 47696
Olympia, WA 98504-7696

RE: Draft Boat Yard NPDES General Permit Renewal

Mr. Hovis,

Thank you for providing an opportunity to comment on the draft Boat Yard NPDES General Permit renewal. A strong marine trades industry is a key economic driver throughout Washington State, and Whatcom County in particular. The Port of Bellingham supports a vibrant and diverse marine trades industry in our community, including a number of operating boatyards with coverage under the Boat Yard General Permit. These businesses provide stable, living-wage employment which have proven critical to our local economy especially throughout the Covid-19 pandemic. The Port of Bellingham also supports utilization of sustainable, innovative and responsible best practices for operations throughout Port properties, especially when in close proximity to the sensitive nearshore environment.

With all of this in mind, please consider the ability for these critical marine trades businesses to comply with the significantly reduced benchmarks in the currently proposed draft Boat Yard General Permit renewal. In our experience, the marine trades industry has provided innovative best management practices while adjusting to changing regulations, however we are concerned the proposed benchmarks may not be achievable.

Thank you for the ongoing efforts to improve environmental conditions throughout the Salish Sea while supporting a critical part of our regional economy.

Sincerely,

Brian D. Gouran
Director of Environmental and Planning Services

cc: Shirley McFearin – Port of Bellingham
Brady Scott – Port of Bellingham