

# Commencement Bay Marine Services

Please consider these comments from Commencement Bay Marine Services, Inc(CBMSI)as you look to put forward a fair permit for the permitted entities. As for CBMSI, we are endangered species ourselves. By that, I mean we are one of the remaining 63 boatyards left in the state of Washington. While in 1997, there were over 110, today, due to an incredibly difficult permitting regime, our numbers have shrunk to just a hair over 60. No longer is it rare for a boatyard to out of business. When a boatyard closes down, we all lose.

CBMSI is a full-service marine vessel repair and boat parts company. We are located across from downtown Tacoma on the east side of the Foss Waterway, across the 11th Street Bridge. We offer a variety of marine electrical, plumbing, maintenance and engine services.

When boats are serviced at CBMSI, they are supporting youth programs on the water. CBMSI shares a campus with the Tacoma Youth Marine Center - home of the Tacoma Sea Scout Base. Proceeds from CBMSI support the Youth Marine Foundation to ensure Tacoma Sea Scouts units, Grow Boating Tacoma youth programs and high school marine science cruises are accessible for the youth of Western Washington.

We believe Department of Ecology would be better directed spending their limited resources on the generators of the pollution and not the end of the pipe entities that struggle to meet an already difficult permit. Actually, if Ecology went this route, it would benefit everyone.

We are just the small potatoes in the world of pollution. For example:

In early March of 2020 Covid shut our yard down. We cleaned the yard and put it to rest. For a month we had no activities, no vehicle traffic, no boat repairs and no boat cleaning. The yard was left in pristine condition.

Test results on April 23 were:

Copper 37

Zinc 26

Clearly most of our pollution is from exterior sources, the trains, the freeway and what else? We use bottom paints which meet current standards and fewer boats arrive with old bottom paints again reducing potential contamination.

We no longer take in derelict boats and destroy them. They pollute our yard and place us at risk of non-compliance. Let them sink in the bay, we can ignore this source of pollution. Boat yards inland from us have few standards to follow allowing contamination to flow freely into the sound. At the end of our waterway all the contamination from I-5 and South Tacoma flows freely into our waters.

The Department of Ecology seems to be swatting at gnats when in fact they could surely make a huge difference addressing the greater issues. I believe the changes recommended could be very harmful driving pollution underground and out of site, never dealing with the substantive issues.

We are proud of our yard and the national leader Sea Scout program at our home base. Come by for

a tour some time! You will be impressed.

Sincerely

Thomas Rogers  
President