

Zittel's Marina, Inc.

Zittel's Marina, Inc. is a family-owned business that has operated in Thurston County for more than sixty years. As part of our business, we operate a small boat yard. At maximum capacity, we have approximately four boats in our boat yard. Most of the year we operate at less than half that capacity.

The reason why this is relevant is that even using current best management practices, we are unable to consistently meet the currently proposed benchmarks for copper. Furthermore, it is not clear what processes and equipment would be needed to meet these requirements. If significant additional capital investment is required to meet this standard, we may be required to cease boatyard operations.

While we understand that water quality is an important issue, this rule addresses an extremely minor contributor to this problem by imposing extremely harsh requirements. If boat yards begin to shut down because of these requirements—or the cost of using these boat yards is significantly increased—boaters may look for ways to avoid using licensed boat yards. As such, rules like this like this could potentially cause more harm than they prevent.

Finally, we are aware that the Northwest Marine Trade Association (NMTA) and its other partners have submitted a comment on this rule. We stand with NMTA and these partners in opposing the proposed rule to the boatyard permit.