



STATE OF WASHINGTON
WASHINGTON STATE BOARD OF HEALTH

PO Box 47990 • Olympia, Washington 98504-7990

February 4, 2005

The Honorable Brian Sullivan
Washington State House of Representatives
House Natural Resources, Ecology & Parks Committee Chair
Post Office Box 40600
Olympia, Washington 98504-0600

Dear Representative Sullivan:

I am writing as the chair of the State Board of Health in regard to House Bill 1415, an act relating to the impacts of commercial passenger vessels on the marine waters of Washington, which is scheduled to be heard before your committee this afternoon. The Board is charged with regulating the sanitation of shellfish and shellfish growing areas. It is very interested, therefore, in the impact of wastewater discharge from commercial passenger vessels. Such discharges have resulted in shellfish closures in the past.

In March 2004, the Board heard from a representative from Jefferson County Public Health and Human Services regarding concerns about the policies and practices related to the management of marine vessel wastewater. Jefferson County had experienced a large sewage release from a cruise ship the prior year that was of great concern to the local board of health. The Board also heard from the Department of Ecology about the development of a memorandum of understating (MOU) between the state of Washington, the Port of Seattle, and the Northwest Cruise Ship Association. The Board elected to follow the issue and asked the Department of Ecology to report back on the implementation of the MOU after 1 year. It is awaiting a formal presentation from the Department of Ecology, tentatively scheduled for April. I understand from a recent report that the MOU has been successful in attaining some of its goals to manage wastewater discharges from cruise ships. The Board believes, however, that there is not enough information available at this time regarding the effects on shellfish growing areas of continuous discharges from advanced wastewater treatment systems on board cruise ships, particularly with regard to viruses in discharges.

The Board supports efforts to give the state regulatory authority over marine vessel discharges, including pursuing a congressional exemption to the Clean Water Act. Consideration should be given, however, to the effects of wastewater discharges on the state's shellfish growing areas, and current practices may need to be adjusted if adverse effects are identified. We join the Department of Health in requesting that the Legislature consider a provision to allow for investigations on the specific impact of wastewater discharges on commercial and recreational shellfish growing areas.

Sincerely,

Thomas Locke, MD, MPH
Chair, Washington State Board of Health

cc: House Natural Resources, Ecology & Parks Committee Members
Ms. Chris Townley, Department of Health
Washington State Board of Health Members
Craig McLaughlin, State Board of Health