

Working Group on Seafood and Energy

Thank you for proposing this important step to reduce nitrogen loading, hypoxia, and acidification in Puget Sound. On behalf of the Working Group on Seafood and Energy, I'm pleased to submit the attached comment letter in support of the proposed General Permit approach.

**Working Group
on Seafood
& Energy**



Working Group on Seafood & Energy
PO Box 30615
Seattle, WA 98113

October 21, 2019

To: Puget Sound Nutrient Reduction Program, Washington Department of Ecology
Re: Proposed General Permit for WWTPs

Working Group on Seafood & Energy Members Endorse Proposal to Accelerate Nutrient Reduction via a General Permit for wastewater treatment

The Working Group on Seafood and Energy is a Seattle-based trade association representing seafood producers, suppliers, tribes, fishing communities, and other people who depend on healthy oceans. A primary objective of the group is to reduce pollution in order to maintain thriving fisheries and coastal economies. For that reason, the undersigned members of the Working Group are pleased to endorse the proposed General Permit to curtail nutrient discharges that amplify both hypoxia and ocean acidification in Puget Sound.

Members of the Working Group recognize that nutrient wastes and carbon pollution undercut productive fisheries and marine foodwebs that support approximately 61,000 jobs and more than \$2 billion in economic activity Washington state, according to NOAA.

Oxygen depletion caused by nutrient loading from wastewater is now widespread and persistent in Puget Sound. Along with warming water and acidification, hypoxia is suspected to reduce Dungeness crab reproduction in parts of the Sound. Crab has been a mainstay of tribal, commercial, and recreational harvests lately. Shifts in plankton communities linked to nitrogen loading also may undercut foodwebs supporting multiple species of fish, shellfish and even Southern Resident Killer Whales.

The proposed general permit would establish a shared limit on nutrient discharges, enabling municipalities to team up and accelerate nutrient reduction efforts using tools we have seen work very well in similar situations in commercial fisheries. We urge Ecology to swiftly implement the proposed

permit and work with treatment plant operators to enable cooperative solutions, including nutrient trading and other approaches.

Sincerely,

Erling Skaar
Owner, F/V North American & GenTech Global, Seattle

Pete Knutson
Owner, Loki Fish Co., Seattle

Terry Williams
Board of Directors, Working Group on Seafood and Energy, Tulalip

Larry Soriano
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