

Port Gamble S'Klallam Tribe

Thank you for this opportunity to comment on the PFAS draft CAP.

The Port Gamble S'Klallam Tribe is specifically concerned about the human health effects of PFAS by way of shellfish and finfish consumption. We appreciate Ecology's commitment to developing a regulatory framework to manage these toxins. However, one of the data gaps identified in the draft CAP is PFAS levels in shellfish and marine fishes (pg. 342). This data gap is especially important to the Tribe, given Tribal members' reliance upon shellfish and finfish as a traditional food source, and we are wondering if Ecology has plans to perform research in this area, and if not, would they be able to? The Port Gamble S'Klallam people consume much higher amounts of shellfish per capita than do Washingtonians and are thus uniquely at risk if shellfish concentrations of PFAS are high enough to cause negative health effects.

Additionally, we believe regular shellfish monitoring for PFAS should be performed—much like is already done for marine biotoxins and *Vibrio*—to determine whether shellfish harvesting is safe for individuals. That provisional screening levels for PFAS in fishes have been developed is a great first step (pg. 339), but more concrete steps should be taken, such as determining average PFAS concentrations in different shellfish species, developing testing methods for monitoring, and determining what levels should trigger a harvesting moratorium.

Otherwise, we believe the draft CAP is fairly comprehensive and we thank Ecology for taking PFAS seriously despite the current state of our knowledge regarding their human and ecological health impacts.

Thank you for your time,

Josh Carter
Environmental Scientist