



**PORT GAMBLE S'KLALLAM TRIBE**  
**NATURAL RESOURCES DEPARTMENT**  
31912 Little Boston Rd. NE – Kingston, WA 98346

January 22, 2021

Irina Makarow  
HWTR Chemical Action Planner  
Hazardous Waste and Toxics Reduction Program  
Washington State Department of Ecology  
300 Desmond Drive SE  
Lacey, WA 98503

Dear Ms. Makarow:

Thank you for giving Port Gamble S'Klallam Tribe Natural Resources (PGST) the opportunity to comment on the per- and polyfluoroalkyl substances (PFAS) Chemical Action plan (CAP). We appreciate the effort and time put into developing this plan. We are grateful for the extension to submit comments given the compounding impacts of the COVID-19 pandemic.

The Port Gamble S'Klallam Tribe, of the Point No Point Treaty area, recognize the responsibility to protect our treaty reserved hunting, fishing, and gathering rights. The Tribe recognizes that the inherent traditional and cultural rights constitute vital and irreplaceable resources for the future. These resources are essential for the social, cultural, and economic self-sufficiency and wellbeing of our Tribal community. Given the responsibility of being a co-manager of these resources, the Tribe places high importance to protect and enhance these resources not only for our tribal members but for all people. This includes encouraging a habitat that is both protective of natural resources and human health.

The Port Gamble S'Klallam Tribe for the last 1,000 years have occupied the shores of the Straits of Juan de Fuca, Admiralty Inlet and Puget Sound, living off the land, rivers, and sea. This lifestyle continues today with harvesting of shellfish and finfish for subsistence, ceremonial and commercial uses. With shellfish at times being up to 80% of subsistence harvest, the Tribe is concerned about the persistence of PFAS in the environment. Given it's label as a "forever chemical", the Tribe is alarmed about the potential of bioaccumulation in the food chain, especially in fish and shellfish which are harvested by the tribe for subsistence, ceremonial and commercial uses. This combined with the CAP's reported range of consumer products that contain PFAS chemicals, Tribal members can be one of the most vulnerable communities that are exposed to PFAS chemicals.

Fish consumption is especially of concern for PGST as there are currently no fish consumption advisories for PFAS in Washington. As stated in this CAP, in 2018 the



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Department of Health determined provisional health-based screening levels for PFOS and PFOA based on the 2016 EPA RfDs. The provisional screening levels were 23 µg/g and 8 µg/g for the general population and high consumers, respectively. Data reviewed from studies done in 2008 and 2016 and found that some fillet tissue contained PFOS concentrations in excess of these values. Specifically, PFOS was detected in Washington freshwater fish at levels up to 87 ng/g in fillets. Given Tribal members often consume larger quantities of fish and shellfish compared to the general population, this puts Tribal members at an even greater health risk.

PGST recommends the following changes to the CAP:

- PFAS should be named as a hazardous chemical class as soon as possible.
- Priority to studies to obtain data on PFAS bioaccumulation and current levels in finfish and shellfish to aid in developing a fish consumption criterion. Including regular shellfish monitoring.
- Remove all PFAS containing substances from commerce.
- Prioritize Tribal and vulnerable populations when planning clean-up and mitigation activities.

Thanks again for giving Port Gamble S'Klallam Tribe the opportunity to review the PFAS CAP and the time and effort that has gone into developing this plan.

Sincerely,

Abigail Welch  
Finfish Management Biologist  
Port Gamble S'Klallam Tribe