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Writing as the Environmental Program Manager for the Port Gamble S'Klallam Tribe, I submit this comment regarding measures to reduce the risk of oil spills within the Tribe's Usual and Accustomed (U&A) fishing area. Tug escorts are a proactive strategy that may help prevent spills from grounding or loss of control in marine ecosystems, including treaty protected fishing areas, as well as in areas that have sensitive eelgrass beds. We support risk management plans that reduce the possibility of spills from incidents where a ship may lose steerage or otherwise run aground. The Tribe acknowledges, with the level of ship traffic in the area, it is not if but when a spill may occur. Risk mitigation is as important as post-incident response when it comes to protecting these waters and the ecosystems and wildlife of the region. Reducing the chances for catastrophe is essential to protecting PGST treaty protected rights in the Tribe's lands, waters, and usual and accustomed area. Spill prevention is especially important, as some common spill response measures, such as using dispersals that sink heavier oil. A reduction in spills means a reduction in the chance that spills may sink, either on their own or through chemical dispersant deployment, into these sensitive habitats. Sinking oil may devastate submerged vegetation like eelgrass, which supports forage fish, juvenile fish and crab, and the broader food web stability.

We respectfully request that the final rulemaking addresses underwater noise pollution and vessel disturbance. Noise pollution is a major impact to marine life, whether salmonids or marine mammals, and increasing vessel traffic could have additional environmental impacts. Speed reduction, acoustic quieting technologies, and designated low-noise zones or communications for low-noise due to the detection of orcas in the area, are important ways to mitigate noise pollution. This helps protect marine animals, including the resident killer whales for which this rulemaking was designed to protect. It is important that noise be recognized and regulated as a form of marine pollution.

The Port Gamble S'Klallam Tribe also supports continued transparency in vessel tracking and monitoring to safeguard treaty protected rights regarding fishing and harvesting in the Tribe's waters and U&A. Real time information about marine traffic helps ensure that Tribal fishers have access to treaty protected fishing areas and maintains safety for humans, wildlife, and resources.

Finally, we request that the rulemaking consider a strategic tugboat placement near Port Gamble Bay. A standby tug in proximity to the Tribe's waters would ensure timely response capacity for incidents that threaten PGST's hatchery operations, shellfish beds, culturally important sites, and traditional fisheries. This would be an appreciated step in continued inter-governmental cooperation and spill prevention as we work together to protect these ecosystems.

Thank you for the opportunity to comment and for recognizing the importance of Tribal sovereignty and marine ecosystem integrity in this rulemaking process.