

October 23, 2020

Laurie Niewolny
Washington State Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600
(submitted via the eComments form)

Re: WA waters – marine net pen modified NPDES permits

Dear Ms. Niewolny,

I write regarding the NPDES permit modification decision by Washington Department of Ecology (ECY) for four Puget Sound net pens – three in Rich Passage in Kitsap County and one near Hope Island in Skagit County, to revise the National Pollution Discharge Elimination permit for these facilities to raise native steelhead trout instead of non-native Atlantic Salmon.

Our Tribe has an interest in this matter because modern aquaculture could enable Tribes to continue our traditions, feed our families, and provide fish and shellfish to others. Even as we maintain and rebuild our wild fisheries, we cannot meet increasing domestic demand for seafood through wild-caught fisheries alone. As you may know, Jamestown is exploring modern net pen aquaculture opportunities in Port Angeles Harbor, Clallam County. Permit decisions made for the four facilities under current ECY review will have direct bearing on Port Angeles rearing as well.

Jamestown concurs with Ecology's decision that changing reared species is unlikely to effect water quality. While raising a native species reduces potential ecological impact, the water effect is substantially unchanged because the operations, including biomass and feeding will be similar. Of course, ecological impact has already been evaluated and addressed in the related WDFW Marine Aquaculture Permit issued January, 2020.

Jamestown appreciates Ecology's requirement to improve each facility's notification process for an unusual event; as well as increased monitoring and reporting, including fish food composition (specifically nitrogen %). We further agree that remaining abreast of technological updates is useful to assure best overall operations and production.

As we are confident you understand that fin and shellfish have always been an integral part of S'Klallam culture, as sustenance as well as for the traditions associated with harvest, preparation and celebration. For millennia, S'Klallam people fed their families with fin and shellfish, and traded their abundant harvest with other Tribes, devising methods for holding fresh catch, and preserving the harvest for future consumption.

When explorers, and then settlers arrived on this land, S’Klallam people bartered and sold their familiar harvests to them. Market demand grew with the increasing European population, and S’Klallam fishermen discovered a new market for their traditional foods.

As a sovereign nation, our Tribe has always cherished and protected our treaty rights as well as our right to pursue economic development, both of which contribute to our self-reliance and our ability to thrive as a people and a culture. The 21st century has brought new challenges to exercising our treaty rights - if there are no fish to harvest, how can we access our treaty resources?

We acknowledge there is still skepticism regarding saltwater fish pen operations since the 2017 collapse of a net pen containing Atlantic salmon near Cypress Island in Skagit County. We firmly believe that confidence will be restored. The NPDES permit materials modified by ECY demonstrate clear environmental protection practices and increased monitoring, inspections and reporting; as well as clear preparedness for accidents.

An ongoing cultural identity of Jamestown Tribe includes stewardship of our seafood resources. Further, JST strives for excellence and environmental integrity in all of its endeavors. The Port Angeles Harbor net pen aquaculture opportunity will enable JST to continue our traditions, feed our families, and provide jobs, fish and shellfish to our neighboring communities.

Sincerely,



W. Ron Allen
Chair/ CEO

Cc: Tyson Hawk Oreiro, ECY Tribal Affairs