August 3, 2021

Eleanor Ott, P.E.  
Washington State Department of Ecology   
PO Box 47696  
Olympia, WA 98504-7696

Re: Puget Sound General Permit

Dear Ms. Ott,

In response to the open public comment period, I am writing on behalf of the Washington State Governor’s Salmon Recovery Office to offer comments in support of the Puget Sound Nutrient General Permit. Both Puget Sound Chinook and the Southern Resident Killer Whale (SRKW) population are listed under the Endangered Species Act and continue to decline. Three of the primary threats to the SRKW identified in both NOAA’s Recovery Plan for Southern Resident Killer Whales (*Orcinus Orca*) and in the Governor’s SRKW Task Force Recommendations include prey, vessels, and contaminants. While progress has been made in the threats criteria identified in these plans, collectively more needs to be done to save these species.

In March 2018, recognizing the urgency of the threats facing the SRKW population and the unacceptable loss their extinction would bring, Governor Inslee issued Executive Order [18-02](https://www.governor.wa.gov/sites/default/files/exe_order/eo_18-02_1.pdf) to convene a Southern Resident Killer Whale Task Force. The Task Force met for two years and published two reports: Southern Resident Orca Task Force Report and Recommendations in Year 1; and a Final Report and Recommendations in Year 2. The Year 1 report established goals in increasing Chinook abundance, decreasing vessel disturbance, reducing exposure to contaminants, and ensuring funding and accountability. The Year 2 report summarizes progress on Year 1 Task Force recommendations and added 13 new recommendations, including a new goal of reducing the threat to SRKW from climate change to include ocean acidification. The Puget Sound General Permit is identified as an important action in the recommendations within the overall goal of reducing the exposure of SRKW and their prey to contaminants.

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Clean water and prey are critical to the survival of SRKW. Just this week, a 35-year-old male SRKW, K-21 was seen emaciated with a folded dorsal fin and a ‘peanut head’ condition, and his sudden health decline reminds us about the urgency of implementing the task force recommendations to reduce exposure to contaminants and vessels and to increase prey. Both climate change and water quality will have further impacts to the food web in Puget Sound. It is necessary to act now to improve the quality of water in Puget Sound, so salmon and orca can continue to live here. The balance of the ecosystem is in peril, and good wastewater management is imperative.

I look forward to the continued work of Ecology and its partners on implementing key actions identified in the SRKW Recovery Plan, the Species in the Spotlight Priority Action Plan, and the Task Force recommendations. We need to do all we can to keep water clean for the health of not only salmon and orcas, but for humans as well. I look forward to working in a collaborative and coordinated manner to recover Southern Resident Killer Whales.

Sincerely,

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Tara Galuska, Orca Recovery Coordinator

Governor’s Salmon Recovery Office

cc: JT Austin, Governor’s Senior Policy Advisor

Megan Duffy, Director, RCO

Erik Neatherlin, Executive Director, GSRO

Heather Bartlett, Deputy Director, Department of Ecology