



Snohomish Basin Salmon Recovery Technical Committee

To: Washington State Department of Ecology

Re: City of Everett Water Pollution Control Facility NPDES Permit Renewal, and PBDE's in the Snohomish River Estuary as related to Chinook Salmon in the Snohomish River and greater Puget Sound.

To Whom It May Concern,

Thank you for the opportunity to comment on the City of Everett Water Pollution Control Facility NPDES permit renewal application for Permit # WA0024494.

We are writing on behalf of the Snohomish Basin Salmon Recovery Technical Committee (SBSRTC). For over 20 years, we have worked to provide scientific support for protection and enhancement of the abundance, productivity, diversity, and spatial structure of all salmonid populations in the Snohomish River Basin. The Committee is an independent, self-guiding, and self-directing body that works in parallel with, and in support of, the Snohomish Basin Salmon Recovery Forum and the Snohomish Basin Lead Entity. We are made up of member organizations including Tribes, Federal and State agencies, cities, counties, and NGOs.

Recent scientific research studies led by State agencies and Snohomish Basin partners have illuminated contaminants of emerging concern (CECs) including Polybrominated Diphenyl Ethers (PBDEs) and their potential for toxicity to Chinook salmon and other native species in the environment. Chinook salmon are a keystone species in Puget Sound and a healthy population is critical to maintaining tribal treaty rights and as a food source for many species, including critically endangered Southern Resident Killer Whales. Findings from research conducted under the Salish Sea Marine Survival Project published in 2021 by Long Live the Kings¹ and supported by an array of member organizations suggest that, "evidence indicates that local factors contribute significantly to salmon health and survival in specific populations including toxic contaminants near urban areas," and that "contaminants are limiting the recovery of many Chinook populations, especially those that come from urbanized watersheds in Central and South Puget Sound." The findings go on to describe that "juvenile Chinook in the Snohomish River estuary...were found with very high levels of PBDEs, well above thresholds that cause adverse effects" and that reducing toxic contamination in locations that have the greatest impact, like the Snohomish estuary PBDE hotspot, is amongst the highest priority management actions that can be taken to support salmon survival.

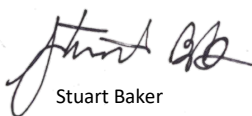
First and foremost, we would like to recognize and commend the actions taken to date by the City of Everett (COE) and the Water Pollution Control Facility. COE has demonstrated a strong commitment to better understanding and evaluating the risks of PBDEs in wastewater and has acted in making

expeditious efforts to minimize these risks utilizing currently available programs and infrastructure. We applaud these recent efforts and support a continued proactive approach by COE and the Pollution Control Facility as we learn more about the emergence of PBDEs as a CEC.

Despite these most recent efforts, there is more that can be done to better understand and ameliorate the prevalence of these CECs in Snohomish River water, inhabiting species, sediments, and biosolids. We support calls from member organizations including basin Tribes, Long Live the Kings, and others, for specific monitoring and mitigation actions that would protect salmon in the Snohomish Estuary. We believe that through an increased monitoring effort we may be able to better understand the nature and extent of this issue. This should include increases in the geographic extent of monitoring locations; the frequency in which this monitoring is occurring; and the matrices sampled for these CECs to include influent, effluent, both deepwater and Snohomish River outfalls, retention pond sediments and associated biosolids. This monitoring then may inform the most effective best management practices (BMPs) and corrective measures. Based on the results of this expanded monitoring and future research, we ask for efforts towards increased mitigation and remediation of these chemical compounds, as well as source control identification and correction, as provisions of this permit.

In summary, PBDEs present many threats to salmon and the environment as a CEC. Amongst these challenges, we recognize the unique circumstances in which these expanded permit revisions may impact COE, its ratepayers, and the WWTP facility infrastructure. Further, we understand and appreciate the responsibility of COE to consider the needs of its ratepayers a paramount consideration. We commend and fully support efforts by COE to date to assist in evaluating and controlling the prevalence of this CEC in the environment. The committee supports assertions by basin Tribes and member agencies calling for expanded monitoring, source control, and remediation as provisions of this permit to support furtherance of baseline understandings of the nature and extent of this CEC and its impacts on the natural environment. Expanded monitoring may lead to enhanced source identification and control, and ultimately, remediation of these chemical substances from our wastewaters and ultimately our natural environment. Continued research and remediation efforts identified in this permit may aid in establishing BMPs to be replicated elsewhere, setting the standard in this field. We support permit considerations and provision of resources to avoid inequitably concentrating negative impacts of source control and remediation efforts on small businesses and underserved communities, as well as exploring ways to equitably distribute any impacts on ratepayers, such as progressive rate structures. We recognize and appreciate the efforts that have been made on these fronts to date, and we look forward to seeing continued support and engagement from the COE and the WWTP into the future.

Sincerely,



Stuart Baker
Senior Habitat Specialist,
Snohomish County



Norah Kates
WRIA 7 Technical Coordinator,
King County



Matt Pouley
Restoration Biologist,
Tulalip Tribes

¹ Findings of the Salish Sea Marine Survival Project. 2021. Long Live the Kings. Available at: <https://marinesurvivalproject.com/research-findings/>