Justin Parker

Good afternoon,

Attached is a letter from Justin Parker, NWIFC Executive Director, to Casey Sixkiller, Washington Department of Ecology Director, regarding Comments on Draft Puget Sound Nutrient Reduction Plan & Nutrient General Permit.

If you have any questions, please contact Nick Tealer, NWIFC Environmental Protection Policy Analyst, at ntealer@nwifc.org or (360) 438-1180 ext. 333.

Thank you.

Northwest Indian Fisheries Commission
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August 27, 2025

Casey Sixkiller, Director
Washington Department of Ecology
300 Desmond Drive SE
Lacey, WA 98503

Re: Comments on Draft Puget Sound Nutrient Reduction Plan & Nutrient General Permit

Dear Mr. Sixkiller:

The Northwest Indian Fisheries Commission (NWIFC) would like to offer the following comments on the proposed Puget Sound Nutrient Reduction Plan and Nutrient General Permit for the State of Washington. These comments are provided to be additive to individual tribal comments. Addressing known sources of pollution, like Wastewater Treatment Plants (WWTPs), is a focused and urgent priority for the NWIFC member tribes and it is paramount that the Department of Ecology's approach reflects these concerns into the overall strategy for restoring water quality for all. Protecting and restoring water quality is central to upholding tribal treaty obligations and rebuilding the ecosystems we all depend on.

The NWIFC is comprised of the 20 treaty Indian tribes in western Washington, each of which retain constitutionally protected, treaty-reserved rights to harvest, consume, and otherwise manage fish, shellfish, and other treaty-reserved resources within their usual and accustomed areas.[1] As natural resource co-managers, tribes have a vested interest and role to play in all policies that affect treaty-reserved resources, such as fish and shellfish, and the protection and restoration of habitat critical to their recovery and long-term sustainability.

The Puget Sound Nutrient Reduction Plan ("PSNRP" or "Plan") plays a pivotal role in this effort because excess nutrients—primarily nitrogen —is fueling eutrophication in Puget Sound's waters. Elevated nutrient levels stimulate algal blooms that, when they die and decompose, consume dissolved oxygen (DO), creating hypoxic "dead zones" where salmon, shellfish and other aquatic life struggle to survive.

This nutrient-driven degradation disproportionately impacts tribal communities whose cultures, economies, and food sovereignty depend on healthy salmon and shellfish populations. The loss of viable harvest areas threatens tribal livelihoods and treaty-protected resources.

[1] The NWIFC member tribes are the Hoh, Jamestown S'Klallam, Lower Elwha Klallam, Lummi, Makah, Muckleshoot, Nisqually, Nooksack, Port Gamble S'Klallam, Puyallup, Quileute, Quinault, Sauk-Suiattle, Skokomish, Squaxin Island, Stillaguamish, Suquamish, Swinomish, Tulalip, and Upper Skagit.

Because nutrient pollution operates on a watershed and marine ecosystem scale, managing it effectively requires an integrated, enforceable plan like the PSNRP—one that addresses both point and nonpoint sources and establishes clear targets and timelines. Without such a plan, nutrient pollution will continue to undermine broader water quality and salmon recovery efforts, no matter how well other protections are implemented.

These comments are submitted jointly on the Draft Puget Sound Nutrient Reduction Plan and the 2025 Draft Puget Sound Nutrient General Permit. While each document serves a different regulatory function, they are deeply interdependent and must be aligned to achieve meaningful nutrient reductions in Puget Sound. For clarity and efficiency, we offer a unified set of comments that address both the strategic goals of the PSNRP and the implementation mechanisms of the General Nutrient Permit.

A. Background

Nutrient pollution—primarily from nitrogen—has become a growing concern for Puget Sound's water quality. These nutrients enter the ecosystem through a variety of sources, including WWTPs, stormwater runoff, agricultural activities and atmospheric deposition. While nutrients are essential for aquatic life, excessive amounts lead to eutrophication, fueling harmful algal blooms and reducing DO levels in the water. These conditions threaten the ecological health of Puget Sound and jeopardize the cultural and economic well-being of communities—especially tribes whose livelihoods and traditions depend on healthy fisheries. We agree with the Department of Ecology (Ecology) that nutrient pollution is a serious and urgent problem that requires immediate, sustained, and coordinated action.

Recognizing these threats, Ecology developed the draft a strategic framework to reduce nutrient inputs, improve DO levels, and protect water quality. The Plan aims to establish nutrient load targets, coordinate monitoring and adaptive management, and guide permitting and voluntary reduction efforts across multiple sectors.

Importantly, the PSNRP does not stand alone—it is part of a broader regulatory and policy ecosystem. It works in concert with the Puget Sound Nutrient General Permit,[2] which sets enforceable requirements for WWTPs; the Nonpoint Source Pollution Management Plan,[3] which targets diffuse sources of pollution from land use activities; and Washington's Growth Management Act,[4] which guides land use and development to reduce sprawl and protect environmental resources. Aligning the PSNRP with these efforts is essential to ensure consistency, close gaps and achieve durable water quality improvements at scale.

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[2] Washington Department of Ecology, National Pollutant Discharge Elimination System (NPDES): Draft General Nutrient Permit (2025), Available at: https://fortress.wa.gov/ecy/ezshare/wq/permits/PSNGP-2025-DraftPermit.pdf

[3] Washington Department of Ecology, Draft Washington's Water Quality Management Plan to Control Nonpoint Sources of Pollution (2025), Available at: https://apps.ecology.wa.gov/publications/documents/2510040.pdf

[4] Washington Growth Management Act, WASH. REV. CODE 30.76 *et seq.*

A key component of the PSNRP is the *Advanced Restoration Plan* (ARP),[5] which provides a flexible pathway for permittees to go beyond minimum permit requirements by implementing early actions to reduce nutrient discharges. However, the PSNRP lacks clarity on how these ARPs will be evaluated. It does not set clear benchmarks, quantify expected nutrient reductions, or define what constitutes "success." Without measurable goals and timelines, it is difficult to assess whether ARPs are delivering meaningful improvements. If an ARP fails to achieve intended nutrient reductions, there must be a stronger enforcement backstop—whether through permit modifications, compliance actions, or mandatory upgrades. Voluntary efforts cannot substitute for enforceable standards.

Given the complexity of nutrient sources and their interactions with natural systems, the PSNRP emphasizes collaboration among federal, state, tribal, and local entities, along with the integration of scientific data and traditional ecological knowledge. But the effectiveness of the PSNRP will depend on more than coordination. It must also ensure clear roles, enforceable standards, and equitable outcomes. Stronger integration with tribal co-managers, other existing plans, and local implementation tools will be key to delivering meaningful and measurable progress.

B. Major Areas of Concerns and Recommendations

As Washington moves forward to address nutrient pollution in Puget Sound, it is critical that the state's efforts reflect both the ecological complexity of the region, and the legal and cultural commitments it holds to tribal nations. Nutrient pollution threatens not only water quality but the very foundation of salmon recovery and treaty-reserved rights.

Our comments below highlight areas where the draft PSNRP demonstrates important progress, as well as key opportunities to strengthen tribal engagement, implementation accountability and environmental justice. We offer these perspectives to ensure the PSNRP is both scientifically sound and socially equitable—capable of delivering meaningful results for all who depend on Puget Sound's waters.

1. Positive Aspects of the Puget Sound Nutrient Reduction Plan

We appreciate the State of Washington's efforts to develop a comprehensive and coordinated approach to nutrient reduction in Puget Sound. Nutrient pollution is complex, and a statewide framework is essential for protecting water quality and aquatic life.

Notable positive elements of the draft PSNRP include:

- **A much-needed statewide framework:** The Plan provides a unified vision and strategy for reducing nutrient pollution across diverse sources and jurisdictions that move beyond piecemeal or ad hoc approaches. We acknowledge the effort required to produce this draft despite challenges.

[5] Washington Department of Ecology, Draft Puget Sound Nutrient Reduction Plan (2025), at 23; Available at: https://apps.ecology.wa.gov/publications/documents/2510038.pdf

- **Recognition of complexity:** The Plan acknowledges the varied and diffuse sources of nutrients—including wastewater, stormwater, agriculture, and atmospheric deposition—and the inherent challenges in setting realistic DO targets in such a dynamic estuarine environment.

- **Investment in advanced modeling and science:** The use of updated watershed and Puget Sound models to estimate nutrient loads and predict impacts reflects a commitment to integrating the best available science into decision-making.

- **Stakeholder engagement:** While consultation with tribes and other stakeholders requires strengthening (as noted below), the PSNRP does demonstrate an intent to engage a broad range of partners, including local governments, industries and environmental groups.

This foundation represents a meaningful start toward addressing nutrient pollution in Puget Sound. However, the Plan must advance beyond broad aspirations to ensure that tribal rights are honored, implementation is enforceable, and accountability mechanisms are robust and transparent. There are many facets of water quality that are deeply interconnected—such as stormwater, riparian protection and restoration, growth management, nonpoint source control, and climate change—but they are too often treated as silos within the management system. As this Plan evolves, it is essential that these linkages are acknowledged and operationalized. Work happening under the General Nutrient Permit, Nonpoint Source Management Plan, the Growth Management Act, and other pertinent programs must not exist in parallel, but be incorporated and aligned within the PSNRP to ensure cohesive, system-wide progress.

While the PSNRP lays out initial nutrient load targets and a structure for adaptive implementation, it stops short of a formal regulatory mechanism such as a Total Maximum Daily Load (TMDL) under the Clean Water Act. A TMDL would establish a legally enforceable nutrient cap for Puget Sound and provide a stronger backbone for accountability. We urge Ecology to build on the current modeling and monitoring investments to move toward development of a Puget Sound-wide TMDL—or a set of regional TMDLs—that allocate allowable loads, define clear timelines, and establish consequences if targets are not met. Without this regulatory underpinning, the success of the PSNRP depends too heavily on voluntary actions and aspirational commitments. A strong legal framework is essential to ensure that nutrient reductions are durable, equitable and enforceable across all contributing sources.

2. Treaty Rights and Resources: Centering Salmon and Shellfish Recovery in Nutrient Reduction

For tribal nations in the Puget Sound region, the health of the water is directly tied to the health of our people, our cultures and our economies. Salmon are not just a resource – they are relatives, and are central to our diets, identities and ways of life. For generations, we have watched as salmon populations decline—not from natural causes, but from cumulative harm like habitat loss, pollution, warming waters, and now, worsening dissolved oxygen conditions linked to excess nutrients.

The waters of Puget Sound are protected by treaties signed between the tribes and the United States, which reserve the right to fish, harvest shellfish, and access marine resources at usual and accustomed areas. These are not historical footnotes—they are living rights, upheld by law and tied to the condition of the ecosystems that support these species.

Yet today, degraded dissolved oxygen levels and nutrient-driven eutrophication are making it harder for salmon and shellfish to survive and thrive. These are not abstract water quality problems. They are felt in every failed run, every empty or decertified shellfish bed, every missed season. Addressing nutrient pollution is not just an environmental goal—it is part of the state's legal obligation to uphold treaty rights.

We urge Ecology to explicitly acknowledge in the final PSNRP that nutrient recovery is inseparable from salmon and shellfish recovery, and therefore inseparable from fulfilling treaty responsibilities. The PSNRP must center this reality.

We recommend that the final PSNRP include clear language connecting nutrient reduction strategies to existing salmon recovery frameworks, including the Statewide Salmon Recovery Strategy,[6] the Puget Sound Action Agenda,[7] and tribally developed recovery plans. Without a unified approach, we risk developing fragmented solutions to interconnected problems.

The General Nutrient Permit must reflect this same linkage. Because salmon health is a central measure of ecosystem integrity, we recommend that Ecology incorporate salmon recovery objectives as explicit performance metrics in General Nutrient Permit implementation. Doing so will ensure that water quality improvements translate into biological outcomes that matter most to tribal communities and the public.

3. Strengthening Implementation, Monitoring and Adaptive Management

We recognize that improving dissolved oxygen levels in Puget Sound is a complex, long-term challenge. But complexity must not become a reason for delay. The PSNRP, as written, leans too heavily on voluntary participation by WWTPs, with few clear commitments or consequences if those voluntary efforts fall short. Without a defined roadmap, the PSNRP risks remaining more aspirational than actionable.

Other estuaries across the country, including Chesapeake Bay and Long Island Sound,[8] have faced similar nutrient challenges and responded with enforceable, science-based frameworks. These

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[6] Washington State Recovery and Conservation Office, Statewide Salmon Recovery Strategy (2021), Available at: https://rco.wa.gov/wp-content/uploads/2021/12/GSRO-GovSalmonStrategy-2021.pdf

[7] Washington State Puget Sound Partnership, 2022 - 2026 Action Agenda for Puget Sound (2022), Available at: https://www.psp.wa.gov/2022AAupdate.php

[8] United States Environmental Protection Agency, *Chesapeake Bay Total Maximum Daily Load for Nitrogen, Phosphorus, and Sediment ("Bay TMDL Fact Sheet")*, (updated June 6, 2025), https://www.epa.gov/chesapeake-bay-tmdl/chesapeake-bay-tmdl-fact-sheet; *See also*: Connecticut Department of Energy & Environmental Protection, *General Permit for Nitrogen Discharges (DEEP-WPMD-GP-002)*, effective Jan. 1, 2024 to Dec. 31, 2028

regions developed federally approved TMDLs with clear nutrient caps, timelines and consequences for noncompliance. Their progress demonstrates that meaningful change is possible when plans are backed by strong legal tools, rigorous monitoring and a commitment to accountability. Puget Sound deserves the same urgency and seriousness of purpose. We cannot afford to treat this problem as optional or indefinite.

Appendix H of the Plan outlines the "Preliminary Considerations for the Development and Implementation of Water Quality Based Effluent Limitations," and identifies monitoring parameters including total inorganic nitrogen (TIN), biochemical oxygen demand (BOD), temperature, pH, and total suspended solids (TSS).[9] We appreciate this foundation and see it as a critical starting point. However, effective monitoring must go beyond data collection—it must also be accessible, enforceable and clearly tied to compliance.

Currently, the PSNRP does not provide sufficient clarity on what happens if WWTPs exceed these thresholds, nor does it ensure public visibility into those outcomes. Deviations from expected nutrient inputs—particularly during seasonal variability or extreme weather—can drastically alter the effectiveness of the PSNRP. A monitoring strategy that lacks real accountability will fail to produce real change.

Moreover, relying solely on the PARIS (Permit and Reporting Information System) for compliance tracking is inadequate.[10] PARIS is cumbersome, outdated, and not user-friendly for the public or co-managers. Ecology should commit to developing a modern, transparent nutrient tracking system—ideally one that incorporates real-time alerts for permit violations and unplanned discharges, especially during heavy rainfall events that often trigger combined sewer overflows (CSO) or WWTP bypasses. These events can introduce large, unaccounted-for nutrient loads into Puget Sound and must be part of the nutrient management equation.

We strongly recommend that Ecology establish a public alert system that notifies tribal governments and communities when WWTPs are out of compliance or when spills occur. This will improve accountability, protect sensitive resources, and help ensure timely response and mitigation.

In addition to tracking WWTP performance, the PSNRP should explicitly address how nonpoint source contributors will be held accountable under the adaptive management framework. If point sources face enforceable limits and consequences, then parallel mechanisms must be developed to ensure that diffuse sources are not overlooked or excused from action.

(final permit), https://portal.ct.gov/-/media/deep/water/municipal_wastewater/2024-2028-general-permit-for-nitrogen-discharges.pdf?rev=076b10eee0f043eea798c39492e73c71&hash=3DD08138CDE26D6BA4519E0D87211F8F.

[9] Washington Department of Ecology, Draft Puget Sound Nutrient Reduction Plan: Appendix H (2025), Available at: https://apps.ecology.wa.gov/publications/parts/2510038part8.pdf

[10] Washington Department of Ecology, Water Quality Permitting and Reporting Information System (PARIS), Available at: https://ecology.wa.gov/regulations-permits/guidance-technical-assistance/water-quality-permits-database

We also note that the PSNRP's implementation is closely linked to the Puget Sound Nutrient General Permit, which remains a voluntary permit for WWTPs and is guided by an appointed Board that advises Ecology on the development of future Water Quality-Based Effluent Limits (WQBELs). While this board plays an important role in supporting permit implementation, it does not represent the full range of interests or geographic scope needed to carry out a sound-wide nutrient reduction strategy. As of now, Ecology has not publicly identified who will serve on the board, nor provided a clear process or timeline for how WQBELs will be developed, evaluated or enforced. This lack of transparency risks undermining tribal trust and public accountability—especially when those limits will shape nutrient discharge policies for years to come.

Moreover, if the PSNRP is intended to serve as the overarching framework for reducing nitrogen across all sources, then it must not be constrained by the structure, pace or politics of a voluntary permit program. The PSNRP should clearly articulate how decisions made through the General Permit process—including WQBEL development—will be integrated into the broader adaptive management and enforcement framework described in the PSNRP.

In addition, the PSNRP does not adequately address how Ecology will regulate WWTPs that choose not to participate in the General Nutrient Permit. The only indication Ecology has provided is that these individual permittees will receive revised WQBELs at the time of their next permit reissuance. This approach raises serious concerns. For example, what happens if a non-participating permittee disputes the modeled basis for their WQBELs? Or worse, what if their final assigned loads end up being more permissive than those under the Opt2_8 scenario—a scenario already framed as a compromise within the PSNRP modeling framework? Without guardrails to ensure consistency and fairness across permittees, the PSNRP risks creating a two-tiered system where some facilities are held to stricter standards than others, and where overall nutrient reductions fall short of what's needed to restore water quality. Ecology must clarify how non-participating facilities will be held to equivalent standards and how modeling outputs will be uniformly applied in WQBEL development, regardless of permit pathway.

To help move the PSNRP from concept to implementation, we offer the following recommendations:

- **Provide concrete timelines:** The PSNRP frequently references activities happening "in the future," but lacks a phased implementation schedule. Programs like the Stormwater Action Monitoring Program and key adaptive management triggers must have clearly defined timelines, decision points and deliverables.

    - Because the General Nutrient Permit expires in 2027, but the PSNRP stretches through 2042, it is vital that the two efforts are coordinated. Ecology should align the General Permit's key actions—such as WQBEL adoption and treatment planning—with the PSNRP's major milestones, including the 2026 watershed planning goals and 2031 permit reissuance schedule. Without alignment, we risk missed opportunities, duplicated effort or regulatory drift.

- **Clarify implementation pathways:** If voluntary measures fail to meet dissolved oxygen targets, what happens next? Will future permits include numeric effluent limits—and if so, when, how, and based on what data? Effluent limits should be based on monthly average flows, rather than the sum of monthly flows over a year, to avoid masking seasonal impacts – particularly during summer months when low flows can skew annual averages and allow winter/spring discharges that cause water quality violations. Corrective actions triggered by an Action Level Exceedance should include both short-term measures (to quickly mitigate immediate impacts) and long-term actions (to address underlying causes and prevent recurrence). Clarity on these processes is essential to ensuring measurable environmental results.

- **Integrate tribal monitoring and data:** Tribes throughout Puget Sound operate high-quality, place-based water quality monitoring programs in many of the watersheds most affected by nutrient pollution. These data sets are among the most consistent, long-term and reliable in the region. Yet the PSNRP currently lacks a clear pathway to incorporate tribal science into decision-making.[11] If Ecology's current water quality assessment protocols do not consider data collected by tribes, the PSNRP should explicitly address how this barrier will be resolved so that all relevant, high-quality datasets – including those from tribal programs – inform nutrient management actions.

- **Define General Nutrient Permit Board**: We recommend that Ecology publicly define the board's composition, scope and decision-making process, and commit to tribal consultation and transparency, before moving forward with WQBEL development under the General Permit.

- **Develop a publicly available registry for WWTPs who choose not to opt into the General Nutrient Permit and a response plan:** Ecology should commit to issuing interim guidance on WQBEL development for non-participating permittees and affirm that all nutrient allocations—whether under the General Nutrient Permit or individual permits—will be aligned with the PSNRP modeling scenarios and overall load reduction targets.

    - In addition, to ensure transparency and fairness, Ecology should publish and maintain a public registry of participating versus non-participating WWTPs, with clear timelines for incorporating WQBELs into both permit pathways. This accountability structure should be housed within the PSNRP's broader adaptive management framework.

- **Develop and publish public dashboard that is specific to the General Nutrient Permit**: We also support the development of a centralized, public-facing dashboard that tracks nutrient exceedances, adaptive responses and compliance actions under the General Nutrient Permit. This tool must include data for salmon-bearing streams and shellfish areas to

[11] See NWIFC, *supra* note 8

ensure that nutrient impacts to treaty-reserved resources are visible, tracked and addressed.

Ecology should work in close partnership with tribes to establish tribal-led monitoring programs that align with EPA and state requirements while ensuring that tribal knowledge, priorities and data sovereignty are respected. This is not only sound science—it is sound governance.

In short, the PSNRP must do more than outline what might happen. It must articulate how, when and with whom these actions will occur—and how they will be tracked, enforced and shared transparently with the public.

4. Nitrogen Trading Program: Significant Concerns

The draft PSNRP proposes a nitrogen trading program—intended as a market-based mechanism allowing facilities to buy and sell nutrient reduction credits. While such programs can provide flexibility in some contexts, the proposed approach in the PSNRP as currently drafted raises serious concerns and should not proceed without major revisions.

Key issues include:

- **Localized nutrient "hot spots"**: Trading could concentrate discharges in specific areas while reductions occur elsewhere, worsening dissolved oxygen impairments in already vulnerable waters, including shellfish beds and nearshore habitats of cultural and ecological importance.

- **Incomplete coverage of nutrient sources**: Trading under the Clean Water Act is generally limited to point sources. While certain large stormwater discharges (e.g., Phase I and II MS4s) are regulated as point sources, nutrient contributions from unpermitted stormwater and agriculture are excluded—limiting the program's ability to address the full nutrient problem.

- **Risk of inequity**: Some facilities have been given allocations higher than their current discharge levels, allowing them to "grow into" those limits rather than reduce loads. This could enable increases from major dischargers while others, often smaller or already constrained facilities, are required to make cuts—raising fairness concerns across the region, particularly in South Sound.

- **Disproportionate impacts on tribal communities**: The communities most harmed by nutrient pollution—tribal nations who have lost access to shellfish beds and experienced declines in culturally important species—must be at the center of decision-making, not sidelined in favor of cost savings for large dischargers.

- **Transparency and governance gaps**: The PSNRP lacks detail on how credits would be generated, tracked, enforced, or retired, and provides no clear role for tribal governments in program governance.

Recommendations:

- Engage tribal governments early and continuously in program design and implementation to protect treaty rights and cultural values.

- Establish safeguards to prevent localized degradation, including spatial and temporal limits on credit generation and use.

- Ensure environmental justice principles guide program design so overburdened and frontline communities are not disproportionately impacted.

- Maintain transparency in accounting, trading, and enforcement, with accessible data for the public and tribal partners.

- Clarify that trading is a supplement to—not a replacement for—direct nutrient reductions and enforceable permit limits, particularly for the largest sources.

Without these changes, the proposed trading program risks becoming a loophole that undermines nutrient reduction efforts and perpetuates environmental inequities.

5. Equity and Environmental Justice

As Washington moves forward with nutrient reduction strategies, we must be vigilant about who bears the cost—financially, administratively and ecologically. Without intentional design, the PSNRP could unintentionally shift the burden of implementation onto those least equipped to shoulder it: overburdened communities, rural residents and tribes.

Many of these communities are already facing aging infrastructure, limited funding capacity and legacies of underinvestment. For tribes, there is the added dimension of ongoing treaty obligations and historical injustices that continue to shape access to clean water, fishable waters and livable homelands.

If we are to advance nutrient recovery in a way that is both effective and just, equity must be built into the PSNRP's implementation—not added as an afterthought.

We recommend that Ecology:

- **Prioritize tribal and overburdened communities** for technical and financial assistance related to WWTP upgrades and planning. These communities must not be left behind due to capacity constraints or funding gaps.
- **Integrate environmental justice and equity metrics** into how the General Nutrient Permit is implemented and tracked. This includes evaluating who is benefiting from nutrient reduction investments, who is being asked to take action, and how burdens are distributed.

- **Improve accessibility of the PSNRP** through plain-language summaries and visual tools—such as one-pagers, explainer videos and simplified naming conventions for technical models. For example, terms like "Opt2_8" may be clear to modelers but are confusing for communities trying to understand how decisions are being made and which scenarios are being prioritized.

Participation requires that the PSNRP is clear, understandable and transparent. And true equity means ensuring that communities most affected by water quality degradation are also empowered to lead in its restoration.

Conclusion:

Reducing nutrient pollution in Puget Sound is essential—not only for the health of the ecosystem, but for the continued exercise of tribal treaty rights, the vitality of our communities, and the survival of salmon and shellfish that define this region. But the *how* matters just as much as the *what*.

We urge Ecology to revise the PSNRP in a way that reflects the full complexity of the Salish Sea, acknowledges historical and ongoing inequities, and affirms the state's government-to-government commitments to tribes as co-managers of these waters.

A successful Plan will be one that:

- Honors treaty rights and centers salmon recovery as fundamental outcomes;

- Builds formal and ongoing tribal partnerships into implementation, not just consultation after the fact;

- Sets enforceable timelines and clearly defined roles, so aspirations translate into action;

- Embraces accountability across political boundaries, recognizing the transboundary nature of nutrient loading; and

- Centers equity in every aspect of implementation, ensuring that no community is left behind or disproportionately burdened.

We appreciate the opportunity to provide these comments and look forward to continued engagement as the PSNRP is revised and finalized. Should you have any questions about this correspondence, please do not hesitate to contact Nick Tealer, NWIFC Environmental Protection Policy Analyst, at ntealer@nwifc.org or (360) 438-1180 ext. 333.

Sincerely,

Justin R. Parker
Executive Director

cc: Jeremy Reiman, Watershed Management Section Senior Planner, Washington State Department of Ecology Water Quality Program