

August 21, 2025

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

Re: Comments on Draft Puget Sound Nutrient Reduction Plan

Dear Casey Sixkiller:

The Snoqualmie Indian Tribe [Tribe] is a federally recognized sovereign Indian Tribe and a signatory to the Treaty of Point Elliott of 1855 in which it reserved to itself certain rights and privileges and ceded certain lands to the United States. As a signatory to the Treaty of Point Elliott, the Tribe specifically reserved to itself, among other things, the right to fish at usual and accustomed areas and the "privilege of hunting and gathering roots and berries on open and unclaimed lands" off-reservation throughout the modern-day state of Washington. Treaty of Point Elliot, art. V, 12 Stat. 928. The Snoqualmie people have stewarded the waters of Tribal ancestral lands since time immemorial, and the Tribe seeks to work collaboratively with the Department of Ecology to continue to protect the waters of the Puget Sound for future generations. Please consider the Tribe's comments on improvements for the Puget Sound Nutrient Reduction Plan (PSNRP).

We support the Department of Ecology's effort to reduce nutrient pollution in the Puget Sound, which negatively impacts cultural resources for the Tribe and other tribes across the region. In light of this, we request a more robust consultation process with tribes so that protecting cultural resources can be centered in this conversation. A consultation process that respects tribal sovereignty will include, at a minimum, a tribes-only comment period (prior to a public comment period) that would give time to review and comment on implementation strategies, target setting, prioritization informed by indigenous knowledge in addition to western science methods, and interpretation of data/adaptive management strategies. Including tribally collected data in the process will inform areas of concern and help to address the potential issue of hot spots forming in sensitive areas of the Puget Sound. The timing around this work is critical, and Ecology should hold to its timeline of nutrient reduction targets by 2050. Further delays will result in impacts to tribal cultural resources, which the state is obligated to protect.



To be effective, the PSNRP needs a stronger outline of reporting and regulatory actions that may be triggered in the event that monitoring indicates that wastewater treatment plants are not meeting their nutrient discharge targets. In addition, this process should be made transparent and public with an accessible public alert system. Clear timelines related to enforcement action, cleanup and remediation, and updates to issues related to human health should be included.

Thank you for providing the opportunity to comment on the Puget Sound Nutrient Reduction Plan. We look forward to future collaboration on this effort.

Sincerely,

Snoqualmie Tribal Council

Robert M. de los Angeles, Tribal Chairman

Amber Holloway, Secretary of Tribal Affairs