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Via Electronic and First Class Mail

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Re: Preliminary comments on Coast Seafoods Company's May 2019 Engineering Report and National Pollutant Discharge Elimination System permit application for its Quilcene, Washington shellfish hatchery.

Dear Ms. Niewolny:

Our law firm represents the Olympic Forest Coalition (OFCO) in matters related to Coast Seafoods Company's Quilcene, Washington shellfish hatchery (the facility). With this letter we are providing the Washington State Department of Ecology (Ecology) with some preliminary comments and questions regarding the report entitled *Engineering Report for NPDES Permit Application*, which is dated May 2019 and which SLR International prepared for Coast Seafoods Company (Coast) as part of Coast's application for a National Pollutant Discharge Elimination System (NPDES) permit for discharges of pollutants from the facility.

We offer these questions and comments constructively and with the hope they will assist and not impede NPDES permitting for the facility. Although OFCO and Ecology did not initially agree on whether Coast's facility required a permit, OFCO shares Ecology's commitment to a healthy natural environment and to limiting water pollution to waters of the state. In particular, OFCO hopes that Ecology's NPDES permitting of the facility will reduce discharges of pollutants from the facility, eliminate the risk of human error and discharges of toxic chemicals like chlorine and ammonia, and increase transparency regarding pollutant discharges and water quality management at the facility. Please consider these comments and questions in the spirit in which they are offered—to assist and not impede permitting for the facility—and please let me know if you have any questions or concerns after reviewing them.

I. General Concerns.

Generally speaking, OFCO requests that Ecology remain skeptical about Coast's primary contention that effluent from the facility is pollutant-free and so not in need of treatment. Echoing the rest of its May 2019 engineering report, Coast states in the executive summary of that report that:

The seed and larvae produced by Coast are very sensitive to pollution; therefore the water in which they are grown must be kept pollution free. No purpose would be served by further controlling or treating—and it would be unreasonable to further control or treat—this already clean water before discharging it to Quilcene Bay. There are no pollutants in wastewater in concentrations that would cause or contribute to a water quality standards exceedance in the bay, there are no effluent limit guidelines (ELGs) for hatchery operations, and there are no further reasonable prevention, control, or treatment measures that could be employed that would substantially improve the quality of the discharge or water quality in the bay.

SLR Engineering Report at page v. OFCO has at least three general concerns.

First, Ecology should not accept Coast's contention that Coast does not need to treat its effluent because it is pollutant-free when discharged. If the water in Coast's tanks is pollution free, as Coast argues, then why does Coast need to empty the tanks regularly and why does Coast need to scrub each tank with chlorine-based cleaning products before refilling the tanks for the next use? A fish tank might be an apt analogy; pet fish need clean water to live in, but as anyone who has ever had pet fish knows, that does not mean that fish tanks do not need regular cleaning or that the water in a fish tank is clean before the tank is cleaned and re-filled. Similarly, if the water in the tanks is clean, then why doesn't Coast recycle water throughout the facility to avoid discharging pollutants, and avoid NPDES permit requirements, altogether? Coast's basic contention is contrary to common sense, contrary to its tank cleaning practices, and contrary to water quality sampling from the facility, all of which demonstrate that the tanks and the water in the tanks get dirty such that Coast needs to discharge the water and clean the tanks to continue operations.

Indeed, water quality samples from the facility demonstrate that Coast's effluent contains numerous pollutants at levels that exceed the quality of the influent drawn into the facility. After sampling effluent from the facility, Rensel Associates Aquatic Sciences produced a report dated February 7, 2013 and entitled "Quilcene Bay Shellfish Hatchery Discharge Study" (Rensel Report). For a variety of materials, the Rensel Report compared the chemical content of the water drawn into the facility to the chemical content of the effluent leaving the facility. For dissolved inorganic nitrogen, total suspended solids, Chlorophyll a, and Phaeophytin a, the Rensel Report found that the chemical loading in individual samples of effluent from the facility was *usually higher* than the chemical loading in the water drawn into the facility. For Total Nitrogen, Total Phosphorous, Soluble Reactive Phosphorous, Ammonia Nitrogen, and Nitrate + Nitrite Nitrogen, the Rensel Report found that the chemical loading in the effluent was *always higher* than the chemical loading in the water drawn into the facility. For example, as documented at pages 22-23 of the Rensel Report, effluent from the facility contained 68%, 439%, 178%, 178%, 669%, and 549% of the ammonia nitrogen found in the water drawn into the facility. Subsequent sampling by SLR International—limited though it is—confirms that Coast discharges numerous pollutants to Quilcene Bay.

Second, Coast’s engineering report does not include sufficient information or analysis to support Coast’s assertion that “there are no further reasonable prevention, control, or treatment measures that could be employed that would substantially improve the quality of the discharge.” As I know you are aware, Ecology must require wastes to be provided with “all known, available, and reasonable methods of treatment” (AKART) prior to their discharge into waters of the state regardless of the quality of Quilcene Bay or the small stream at the facility, and regardless of the water quality standards Ecology established for those waters. RCW 90.52.040; RCW 90.48.520. But for most of the pollutants in Coast’s effluent—all the nutrients, for example, and chlorine and ammonia—Coast’s engineering report does not identify and then evaluate effluent treatment options; it does not evaluate the physical characteristics of Coast’s facility or the feasibility of implementing treatment options at the facility; and it does not *demonstrate* that there are no available and reasonable treatment options that would reduce or eliminate pollutants in Coast’s effluent. Even for the pollutants discussed in Coast’s AKART analysis, Coast’s report is deficient for these same reasons.

For these reasons, OFCO requests that Ecology conduct its own independent AKART analysis, as required by law. See RCW 90.48.520 (“...*the department of ecology shall*” incorporate permit conditions that require AKART); RCW 90.48.010 (“the state of Washington will exercise its powers, as fully and as effectively as possible, to retain and secure high quality for all waters of the state.”); RCW 90.52.040 (the Director of Ecology “shall . . . require wastes to be provided with all known, available, and reasonable methods of treatment prior to their discharge or entry into waters of the state.”); RCW 90.54.020(3)(b) (“wastes and other materials and substances shall not be allowed to enter such waters which will reduce the existing quality thereof, except in those situations where it is clear that overriding considerations of the public interest will be served.”).

This is especially important because there clearly are “known, available, and reasonable” methods to treat the pollutants that Coast has acknowledged are in its effluent. For example, recycling of water at the facility—which could eliminate discharges of pollutants from the facility altogether—appears to be an available and reasonable option, yet there is no discussion of recycling water, and no overall justification for the need for continuous discharges from the facility, in Coast’s engineering report.

As another example, Coast notes that it has 16 media filters that discharge 10 minutes per day every day to clear solids. That process of course concentrates and then discharges suspended solids and pollutants into the bay. Yet in its AKART discussion (Report at 21), Coast asserts that it should not have to incur costs associated with preventing or limiting those discharges because filter backwashing is intermittent and mixing at the shoreline will reduce TSS concentrations quickly. But dilution is not the solution to pollution; Coast has not provided documentation of costs that can be independently verified or information regarding how much money it makes at the facility, which would add necessary context to the AKART evaluation; and OFCO disagrees with Coast’s suggestion that investing in pollution controls at the facility is not worth the cost. Coast’s reluctance to cool water discharged from the facility is similarly unsupported and unjustified.

Coast could recycle water used at the facility to reduce or eliminate discharges altogether; Coast could treat for nitrogen, dissolved inorganic nitrogen, phosphorous, chlorophyll, and other pollutants using microbes or chemicals; Coast could treat for total suspended solids and turbidity using filters or a

settling pond; Coast could treat for heat and dissolved oxygen using heat exchangers, settling ponds, or other methods; and Coast could use non-toxic cleaning agents or treat for chlorine and other cleaning chemicals in a way that eliminates the possibility that human error will inadvertently result in discharges of those chemicals to the bay. All of these methods are known, available, and reasonable treatment methods that should be fully evaluated before Ecology concludes Coast does not need to treat its effluent.

Even the Rensel Report included a few simple recommendations for AKART upgrades at the facility (re-plumbing the facility to manage effluent, storm water, and treat effluents). See Rensel Report at 30-31. Since issuance of that report, we believe Coast has expanded facility capacity and operations significantly, from producing 8 billion oyster spat to over 50 billion spat annually. Yet notwithstanding the Rensel Report's recommendations and the increase in operations at the facility, Coast's May 2019 report makes no similar recommendations for AKART upgrades and instead states that AKART is not necessary because the impacts from Coast operations are insignificant. Ecology should not accept Coast's contention that there are no upgrades that can be made.

A rigorous AKART analysis is important because Coast adds numerous pollutants to the effluent discharged from its facility, including heat, chlorine, nutrients, muriatic acid, biological wastes, and solids. This is not a situation where Ecology would be asking Coast to treat for pollutants even though Coast adds nothing to the effluent; rather, it is a situation where Coast is adding numerous pollutants and wastes to its effluent, so Ecology should insist that Coast treat its effluent according to AKART to meet state and federal legal requirements.

Third, because Coast refuses to acknowledge that its effluent is polluted and that there are reasonable methods available to treat its effluent, the engineering report Coast has submitted is flawed and fails to comply with Ecology's regulatory requirements. Coast's engineering report must be sufficient to allow Ecology to determine whether Coast's facility will be operated and maintained to meet effluent limitations, and other requirements of an NPDES permit, and to meet the policies and requirements of RCW 90.48, including any requirements imposed by the AKART requirement. See WAC 173-240-120. But here, because Coast erroneously contends its effluent is not polluted, and because Coast largely fails to evaluate AKART for most of the pollutants in its effluent, Coast's May 2019 engineering report does not demonstrate that Coast's facility will be operated and maintained to meet effluent limitations, and other requirements of an NPDES permit, including any limits imposed through AKART. OFCO respectfully requests that Ecology ask Coast to submit a comprehensive engineering report that complies with all requirements and fully evaluates available treatment options.

II. Miscellaneous Comments and Questions.

In addition to the general observations provided above, OFCO asks Ecology to consider the following as it works with Coast on NPDES permitting for the facility:

- A. **The engineering report says nothing about discharges to the creek that runs through or adjacent to the facility; instead it asserts incorrectly that all discharges are to the marine waters of Quilcene Bay.** Report at 10. Coast clearly discharges waste and pollutants to the creek that runs through its facility. See, e.g., page 10 of Coast's November 2018 *Technical Report to Accompany NPDES Permit Application*, where Coast notes that discharges from Outfalls 16

through 24 and Outfalls 18 through 23 include “flow from the off-site creek.” Additionally, with these comments I am submitting two maps printed from Google that indicate that a creek runs through or adjacent to Coast’s facility.

Coast and Ecology must evaluate whether Coast must eliminate discharges to the stream to comply with AKART or Washington’s water quality standards. What water quality standards apply to the stream? What is Coast discharging to the stream? Are discharges to the stream causing or contributing to violations of water quality standards applicable to the stream? OFCO requests that Ecology evaluate discharges to the stream and insist that Coast cease discharging to the small stream if its discharges impair that stream in any way.

- B. Coast is heating water used in the algae tanks to 16 to 18 degrees centigrade, and heating water used in the setting tanks to 29 to 30 degrees centigrade, and then discharging warm water in excess of numeric water quality standards applicable to Quilcene Bay.** AKART requires Coast to eliminate discharges of heat if such treatment is reasonably available, and since Coast is already using a “heat recovery system” to cool water discharged from larvae tanks, that demonstrates there are treatment measures that meet AKART and that Coast can and must do more to reduce discharges of heat from the facility. Ecology should not permit Coast to add heat to both the larvae and setting tanks but only run effluent from one set of tanks through heat exchangers before discharge.

Additionally, there is insufficient evidence to support Coast’s claims that the bay is naturally over 13 degrees centigrade or that the applicable standard is a 0.3 degree centigrade increase over background. Coast’s data does not establish that for Quilcene Bay, nor does Coast present any evidence that its continuous discharges of heated water do not increase water temperature in the receiving water. Additionally, Coast does not appear to evaluate whether it is discharging heated water to the stream at the site in violation of any water quality standards applicable to the stream. Absent compelling data to the contrary, OFCO requests that Ecology treat all discharges of heat that exceed 13 degrees centigrade as discharges in violation of the water quality standards for temperature that apply to Quilcene Bay.

- C. The AKART analysis and engineering report do not—but must—evaluate compliance with Washington’s narrative water quality standards and sediment standards.** OFCO asks that Ecology require Coast to evaluate all applicable water quality standards in a revised engineering report. OFCO members have taken numerous photographs and videos over the years showing film and surface scum on the beach and waters adjacent to Coast’s facility. Coast admits it regularly back-flushes solids from its media filters and OFCO is persuaded that back-flushing, along with the continuous discharge of heat, nutrients and other pollutants from the facility, is causing violations of Washington’s narrative water quality standards by causing or contributing to surface scum and possibly algae mats or blooms in Quilcene Bay.

Additionally, OFCO requests that Ecology look into whether discharges from Coast’s facility contribute to beach closures due to fecal coliform levels. The Jefferson County Department of Public Health has closed or posted warning signs at Quilcene Beach over the last few years due to elevated fecal coliform levels. That beach is a popular swimming beach and very near Coast’s

facility. Do Coast's discharges of heat or nutrients (or other pollutants) exacerbate fecal coliform concentrations and so contribute to beach closures in Quilcene Bay?

- D. There are insufficient safeguards to prevent discharges of chlorine from the facility.** Coast acknowledges that it regularly uses chlorinated cleaning products to clean tanks at the facility and that it discharges tank washing water directly to the bay. OFCO requests that Ecology ask Coast to sample and report results from specific testing of wash water at the facility. Coast tested for chlorine and it states that "all samples were collected during normal facility operations which include cleaning approximately one third of algae, larvae, setting and broodstock tanks each day, throughout the day." Report at 14. But given that Coast cleans its tanks and discharges wash water from those tanks only periodically, grab sampling would have to occur exactly when that effluent is discharged in order to provide a meaningful test for chlorine. OFCO does not see evidence that Coast specifically tested its *wash water effluent* and so it questions whether Coast has provided meaningful samples regarding chlorine.

For these reasons, OFCO requests that in any permit Ecology insist that Coast: (1) implement measures to eliminate human errors that could result in discharges of chlorinated effluent to Quilcene Bay, such as using non-chlorinated and non-toxic cleaning solutions, collecting wash water in dedicated, separate basins and implementing automated dechlorination and sampling measures; and (2) specifically monitor and report sampling results from all batches of effluent that is exposed to chlorine or other cleaning products. Periodic sampling of wash water is insufficient because any one discharge of chlorine could violate water quality standards or degrade the bay. Additionally, OFCO requests that Ecology ask Coast to regularly sample its wash water effluent so that Ecology and the public can evaluate whether Coast's methods for neutralizing chlorine are effective.

- E. There appear to be potential pollutants that have not been—but must be—disclosed or fully evaluated.** On page 2 of its engineering report, Coast discusses "non-chlorine disinfection" of influent without stating what chemicals or processes it uses to conduct that disinfection. Additionally, Coast's website states that Coast feeds some algae food imported from Asia, and Coast also acknowledges that it uses muriatic acid to clean some locations at the facility. Coast also acknowledges that it uses sodium thiosulphate and hydrogen peroxide to neutralize chlorine in its effluent.

Coast must disclose information about all these processes so Ecology and the public can evaluate whether any of them contain or produce pollutants that need to be regulated in an NPDES permit. For example, it is our understanding that Asian algae require supplements added to the water to provide a suitable medium for the algae to grow. But Coast's reports do not indicate the type and quantity of supplements added for growing algae and the impacts of effluents of these elements on Quilcene Bay. As another example, do sodium thiosulphate or hydrogen peroxide create waste materials that Coast is discharging to the bay? And what is Coast's basis for saying discharges of muriatic acid are insignificant?

- F. Coast commingles process wastewater with stormwater and flows from a stream, which may introduce additional pollutants that need regulation or dilute effluent sampling at the facility.** See Report at 6-7. Are pollutants conveyed via stormwater subject to NPDES permitting

because Coast comingles stormwater and wastewater before discharging? If so, what pollutants are in the stormwater stream and what steps can Coast take to reduce or eliminate discharges of those pollutants from its facility?

Separately, some sampling data may be inaccurate because or if it includes effluent that comes from rainwater spouts, groundwater catch basins, continuous creek flow, or continuous setting department headbox overflow. Are water quality samples taken from comingled stormwater and wastewater effluents representative of wastewater discharges or is stormwater or other water streams diluting sample results and so underestimating pollutant loading to the bay? Must Coast either stop comingling stormwater, stream water, and wastewater or sample wastewater before it joins the stormwater or stream?

- G. Does the “headbox overflow” or “unused filtered bay water” contribute pollutants? Has Coast adequately evaluated all possible pollutants in those sources, or impacts from those sources?** Water pumped into the facility to maintain headbox pressure or for other reasons goes through industrial pipes, industrial machinery, and possibly open channels, and so may pick up a variety of pollutants including oil, grease, solids, heat, and metals. Coast acknowledges it discharges nearly 2,000,000 gallons per day from these sources so there is a potential for significant pollutants and impacts from these discharges. Ecology should not treat these discharges as not subject to NPDES permitting, as Coast requests, but should instead assess and regulate these effluent streams because they plainly result from an industrial process even if the “headbox overflow” and “unused filtered bay water” do not come into contact with algae or shellfish larvae at the facility.
- H. Is Coast polluting the stream or the bay by moving groundwater or water from “marine wells” to surface waters?** The Rensel and SLR reports reference “marine wells” and aquifers, and withdrawals. As far as we can tell, the reports do not provide sufficient information about the specific wells, aquifers, whether they are permitted, withdrawals per source, nor a comprehensive list of sources of fresh water and marine water sources. The Port of Port Townsend, landlord to Coast, has constructed a well (AAB 848, Water Right Permit NO. G2-20136 C, dated 2/23/2017), for its lessee Coast and Port operations. Is Coast operating within the permit for the wells? Is the well metered? Is Ecology aware of any other well permits, or water rights applications, for Coast and does the operation fall within the limits of the permits and rights? Is Coast polluting the bay by moving pollutants in marine wells or groundwater to the small stream and bay?
- I. Will the permit include best management practices or limits to prevent diesel spills from entering the stream or bay?** Coast states that there are four above-ground diesel tanks at the site and it suggests that it provides little or no containment in the event of a leak or spill. Are the storage tanks leaking into groundwater, the stream, or the bay? Will the permit include limits to prevent spills and discharges at the site?
- J. Are the analyses of pH and ammonia insufficient because Coast did not evaluate all the variables or with sufficient data?** For example, for ammonia, the applicable water quality criterion includes both an acute and a chronic component. The chronic component requires averaging concentrations over a four-day period, and the single-day sampling conducted in the

SLR and Rensel reports cannot provide sufficient information to determine whether the chronic component has been exceeded. We have similar concerns with pH sampling. OFCO requests that Ecology require Coast to sample its effluent in ways that ensures Ecology and the public can evaluate whether discharges from the facility are causing or contributing to violations of water quality standards applicable to the receiving waters—the small stream and Quilcene Bay.

- K. Ecology should conduct a more rigorous analysis of nutrient loading from the facility, including “mass loading” calculations, to ascertain the potential that discharges of nutrients and heat contribute to algae blooms, algal mats, ocean acidification, and/or hypoxia in the bay.** As I imagine you are aware, Puget Sound is suffering from nutrient pollution that Ecology and others are trying to study and address in part through the Puget Sound Nutrient Forum. Nutrient pollution can cause or contribute to a number of environmental impacts and Quilcene Bay may be particularly vulnerable to those impacts because it is a comparatively shallow bay.

Indeed, there is some data suggesting Quilcene Bay suffers from low dissolved oxygen conditions, something that can be caused by nutrient pollution. Dissolved oxygen monitoring in Quilcene Bay on August 29, 2019 found near hypoxic conditions in some locations. Waters are hypoxic when they are at 33% saturation for dissolved oxygen. On August 29th the deepest waters in Quilcene Bay, near the berm, found 34.9% saturation for dissolved oxygen. Levels between 35-50% were found at points along East Quilcene Bay. Generally speaking, dissolved oxygen saturation levels under 50% impact marine flora and fauna.

OFCO requests that Ecology conduct a mass loading evaluation of all pollutants and an evaluation of whether discharges of pollutants from Coast’s facility may be contributing to any algae blooms, algal mats, ocean acidification, and/or hypoxia that may be occurring in the bay. Additionally, OFCO requests that Ecology share water quality data for dissolved oxygen that it uses to assess the impacts of Coast’s operations on Quilcene Bay, as well as its analysis of dissolved oxygen data in Quilcene Bay.

- L. Ecology should insist that Coast access and sample all effluent streams to ensure a full evaluation of all discharges of pollutants from the facility.** In its outfall analysis (Report at 12), Coast acknowledges that “many of the discharge pipes are either buried, inaccessible at high tide, or have intermittent flow.” Coast therefore sampled *combined effluents* and in some cases, as far as we can tell, did not sample some flows at all. See Report at 15-16 (acknowledging six pipes not sampled). Because Ecology and the public should have a complete and accurate sampling of all effluent streams from the site, OFCO requests that Ecology insist that Coast separately sample all effluents from *all* pipes, even if that means Coast has to create new access points, and to sample individual flows so pollutants are accurately and fully characterized. That some pipes are buried or inaccessible does not justify allowing Coast to discharge from those sources without evaluating the amounts and kinds of pollutants discharged.

Additionally, OFCO requests that Ecology have Coast sample for fecal coliform. Coast indicates that it pumps sewage from its employee bathrooms to the nearby Port of Port Townsend septic system. And it is our understanding that Coast’s pump and septic pipes are upstream of a creek that empties onto a popular swimming beach—the only public swimming beach on Quilcene

Bay. Unfortunately the BEACH program and Jefferson County Public Health issued “no recreational water contact advisories” for that beach in 2018 and 2019 due to bacterial contamination. Since Coast has systems for moving human waste away from its facility, and since there is some evidence that bacterial contamination is adversely impacting the bay and public swimming areas, Ecology should require Coast to conduct water quality sampling to ensure Coast is not the source of that contamination and to establish any effluent limitations that may be necessary to avoid additional contamination.

As a condition of its lease with the Port of Port Townsend, Coast is required to submit annual reports about its use of hazardous materials in its operations. As far as OFCO can tell, Coast has not submitted any such reports to the Port of Port Townsend. Yet the Rensel and SLR reports include information about ammonia, chlorine, and other hazardous materials used at the facility. Will Ecology’s review include all relevant reports on hazardous materials in Coast’s Operations?

- M. OFCO agrees with Ecology that Coast should conduct a Tier II anti-degradation analysis and OFCO hopes and requests that Ecology will pursue that with Coast, especially for turbidity/TSS, nutrients, ammonia, chlorine, and temperature.**
- N. Coast has proposed insufficient sampling and flow monitoring.** Coast has requested that Ecology require quarterly effluent sampling and weekly flow sampling. These sampling levels are insufficient because they will not ensure constant compliance with any effluent limitations in the permit. OFCO requests that Ecology impose continuous effluent sampling for all waste streams to ensure compliance with effluent limitations. This is especially important for chlorine and ammonia, which are toxic chemicals that can have significant impacts on receiving waters.
- O. OFCO requests that Ecology reconsider whether issuance of an NPDES permit for the facility is exempt from the requirements of the State Environmental Policy Act.** RCW 43.21C.0383(1) provides a SEPA exemption for the issuance of a state “waste discharge permit” for “an existing discharge” if it “contains conditions no less stringent than federal effluent limitations and state rules.” Here, Ecology will issue a federal “NPDES permit” under federal law, not a “waste discharge permit” under state law, and the statutory exemption does not appear to apply to NPDES permits because it does not mention them. Additionally, any exemption would only apply if the permit “contains conditions no less stringent than federal effluent limitations and state rules,” which is not something Ecology can know right now because it has not developed the permit. For these reasons, OFCO requests that Ecology reconsider whether it must subject issuance of an NPDES permit to Coast to SEPA review.

SEPA review would be meaningful here because it would create a process to evaluate impacts from Coast’s facility that have never been evaluated before. As far as OFCO can tell Coast’s facility has never gone through SEPA review. Yet discharges from Coast’s facility could be causing or contributing to a significant number of environmental impacts, including algae blooms and mats, ocean acidification, and hypoxia.

Coast’s facility could also be adversely impacting fish and wildlife. The Washington Department of Fish and Wildlife has documented herring spawning at the head of Quilcene Bay, including at

beaches where Coast discharges pollutants from its facility, as well as smelt and sand lance spawning at beaches south of and across the bay from the facility. And local residents and users of Quilcene Bay have noticed what they feel is a dramatic decline in wildlife on the bay over the last 5-7 years, a time period that coincides with a significant increase in production at Coast's facility. A SEPA evaluation would allow full consideration of impacts to fish and wildlife and the bay that Coast may be causing by discharging pollutants from its facility.

SEPA review would also establish a process for other state and county agencies to comment on the NPDES permit for the facility. Coast Seafoods owns a portion of the parcels where its facilities are located, and leases a portion from the Port of Port Townsend. The Washington Department of Natural Resources holds in trust marine tidelands in Quilcene Bay. And the Port of Port Townsend also operates the Herb Beck marina adjacent to Coast's facility. Coast operations therefore may be impacting the assets of public agencies. SEPA review would ensure Ecology hears from other agencies that have interests that may be affected by Coast's operations.

Thank you for taking the time to review and consider these comments and questions. Please include these comments in the administrative record for this matter. And please also notify me in writing of any subsequent action Ecology takes regarding NPDES permitting for Coast Seafoods' Quilcene, Washington facility.

Finally, please contact me if you have any questions or concerns about these comments or if you would like to meet with me or my client to discuss them. You can reach me at the phone number or email address listed in the letterhead or by mail at Kampmeier & Knutsen PLLC, 811 First Avenue, Suite 360, Seattle, Washington 98104.

Thank you again for taking the time to read and consider these comments.

Kampmeier & Knutsen PLLC

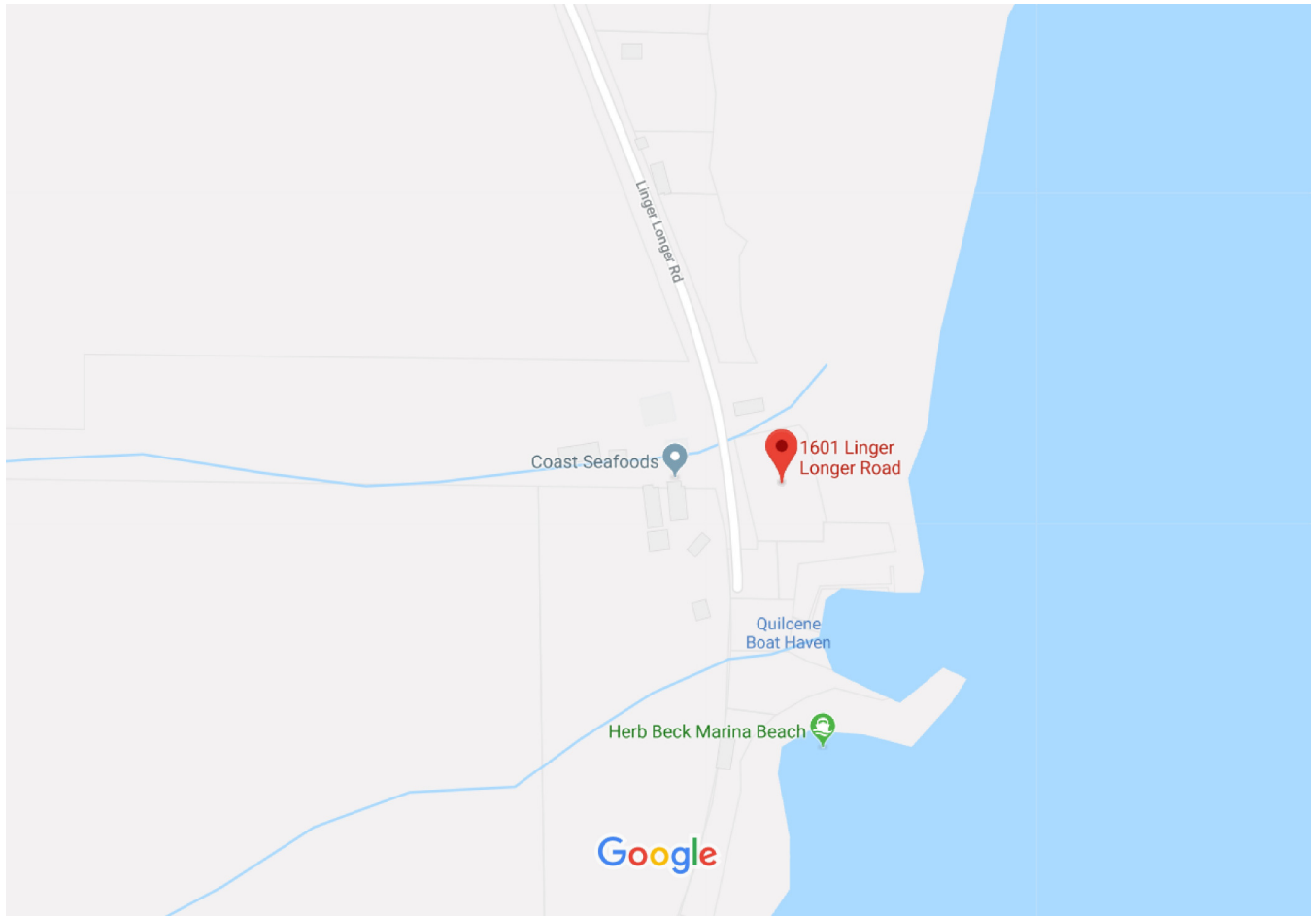
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Attorneys for Olympic Forest Coalition

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Google Maps 1601 Linger Longer Rd



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