



Oregon Coastal Caucus

Rep. Court Boice, Chair
Sen. David Brock Smith, Vice Chair
Sen. Dick Anderson
Sen. Suzanne Weber
Rep. Boomer Wright
Rep. Cyrus Javadi
Rep. David Gomberg

May 20, 2026

Dear Director Feldon,

The Oregon Coastal Caucus writes in strong support of Pacific Seafood and Oregon's coastal seafood industry, which is facing significant regulatory pressure at a time when our state's economy, particularly in rural and coastal communities, cannot afford further job loss or disruption.

Oregon's seafood industry is foundational to the vitality of coastal communities. It supports thousands of family-wage jobs across harvesting, processing, transportation, shipbuilding, ice production, cold storage, and a broad network of local suppliers. Seafood processors like Pacific Seafood provide reliable markets for Oregon fishermen, sustain working waterfronts, and contribute significantly to local tax bases in communities where alternative economic opportunities are limited. When processing operations are forced to curtail or cease, the impacts are immediate and far-reaching, affecting fishermen, port workers, small businesses, schools, and entire local economies.

We are also concerned by the broader regulatory framework under which this enforcement action is occurring. In recent years, DEQ has advanced wastewater permit requirements for seafood processors that appear to mandate discharge standards substantially more stringent than typical drinking water benchmarks. By the agency's own acknowledgment, these standards may not be achievable using currently available treatment technologies. At the same time, levels of contaminants considered safe within municipal drinking water systems are deemed unacceptable in seafood processing discharge. This inconsistency underscores the need for a more practical approach to water quality regulation that considers both science and available technology.

The consequences of setting unattainable regulatory requirements are clear: businesses are placed in untenable positions, often leading to closure, downsizing, or relocation. This trend has already affected rural and coastal Oregon, where regulatory burdens can be particularly acute. While some companies choose to leave the state, Pacific Seafood has demonstrated a continued commitment to investing in Oregon and working in good faith with DEQ to meet evolving expectations.

Since 2017, Pacific Seafood has engaged directly with DEQ regarding wastewater requirements at its Charleston facility, which processes Oregon-harvested shrimp and crab. The company



Oregon Coastal Caucus

Rep. Court Boice, Chair
Sen. David Brock Smith, Vice Chair
Sen. Dick Anderson
Sen. Suzanne Weber
Rep. Boomer Wright
Rep. Cyrus Javadi
Rep. David Gomberg

applied for a new wastewater permit in 2021; however, as of March 2026, DEQ indicated it was only beginning to draft that permit. This prolonged delay has left the facility without the defined limits and engineering benchmarks necessary to design and implement an appropriate treatment system.

Despite the absence of final permit conditions, the company has been encouraged to pursue significant capital investments in wastewater infrastructure, while being informed that future permit limits may not reflect achievable treatment capabilities and could ultimately render those investments obsolete. This dynamic creates unnecessary uncertainty and discourages the very type of long-term investment Oregon seeks to promote. At the same time, DEQ's handling of the penalty, particularly advancing the matter to the media prior to notification of enforcement to Pacific Seafood or any final attempt to resolve the matter prior to issuing the penalties, was inappropriate and may have adversely affected Pacific's reputation.

Oregon's environmental stewardship goals and economic vitality are not mutually exclusive. Achieving both requires a regulatory framework that is transparent, consistent, technologically feasible, and grounded in sound science.

The Oregon Coastal Caucus is in support of Pacific Seafood's timely-filed appeal of the recent enforcement action and respectfully requests that DEQ stay enforcement of penalties pending resolution of that appeal. A stay is appropriate for several reasons.

- Pacific Seafoods has demonstrated a good-faith commitment to working within Oregon's regulatory framework and has filed a formal appeal. Allowing that process to conclude before penalties accrue further is both fair and consistent with the purpose of the appeals process.
- The enforcement standards applied warrant scrutiny. We understand discharge constituent levels deemed acceptable in municipal drinking water systems are treated as unacceptable in seafood processing discharge – a distinction that deserves substantive review, not expedited penalty collection.
- Coastal employers deserve the same good-faith partnerships that other regions around the state enjoy. Just as the MODA Center recently received support to ensure its survival, working waterfronts along the Oregon coast need support to deal with aging infrastructure, limited state investment, and evolving regulatory expectations.



Oregon Coastal Caucus

Rep. Court Boice, Chair
Sen. David Brock Smith, Vice Chair
Sen. Dick Anderson
Sen. Suzanne Weber
Rep. Boomer Wright
Rep. Cyrus Javadi
Rep. David Gomberg

Additionally, we respectfully request that DEQ:

- Pause any related public communications directed at Pacific Seafood until a constructive dialogue can occur.
- Convene a meeting involving DEQ leadership, Pacific Seafood executives, the Governor's office, and relevant stakeholders to identify a clear, achievable, and science-based path forward with reasonable timelines.
- Work collaboratively with the seafood processing industry to establish wastewater permit limits that are technologically feasible, environmentally responsible, and supportive of long-term economic sustainability in Oregon's coastal communities, including the participation of DEQ's enforcement officials in this collaborative process.
- Engage the Coastal Caucus on a broader investment framework for working waterfront infrastructure.

Pacific Seafood and the broader industry are critical partners in maintaining both environmental quality and economic resilience. A collaborative, practical approach will ensure that responsible businesses can continue to operate, invest, and provide family-wage jobs while advancing shared environmental objectives.

Our coastal communities, fishing families, and seafood workers depend on a regulatory system that supports, not undermines, their ability to thrive. The coast deserves a collaborative partner in DEQ, not a penalty collector.

We appreciate your consideration of this appeal and your leadership in working toward a balanced and effective solution.

Sincerely,

Rep. Court Boice, Chair

Sen. David Brock Smith, Vice Chair



Oregon Coastal Caucus

Rep. Court Boice, Chair
Sen. David Brock Smith, Vice Chair
Sen. Dick Anderson
Sen. Suzanne Weber
Rep. Boomer Wright
Rep. Cyrus Javadi
Rep. David Gomberg

Sen. Suzanne Weber

Rep. Boomer Wright

Sen. Dick Anderson

Rep. Cyrus Javadi

Rep. David Gomberg