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# SNOQUALMIE WATERSHED FORUM

June 8, 2020

Water Quality Program  
Washington State Department of Ecology  
PO Box 47600, Olympia, WA 98504



Dear Ms. Niewolny,

The Snoqualmie Watershed Forum (Forum) is pleased to provide comments on the proposed modifications to Cooke Aquaculture's National Pollutant Discharge Elimination System (NPDES) permits for net pen aquaculture. The Forum applauds Ecology for strengthening monitoring and compliance requirements for Cooke in the years after the Cypress Island net pen collapse—but cautions that this is not enough. The Forum urges Ecology to leverage this opportunity to further protect the Salish Sea by adding more rigorous monitoring requirements to Cooke's NPDES permits.

The Forum is a partnership of elected officials, citizens and conservation organizations working to recover salmon and promote watershed health in the Snoqualmie and South Fork Skykomish Watersheds, which span the King County portion of WRIA 7. Member governments include the cities of North Bend, Carnation, Duvall and Snoqualmie, the Town of Skykomish, the Snoqualmie Tribe, Tulalip Tribes, and King County. Our work is guided by the *2005 Snohomish River Basin Salmon Conservation Plan*, a chapter of the *Puget Sound Salmon Recovery Plan*. These plans prioritize the protection of water quality, habitat, and ecological function to recover salmon.

Net pen aquaculture may pose serious environmental concerns—such as degraded water quality and altered benthic communities in and around the facility— if monitoring, siting, and best management practices are inadequate. Yet we lack data and best management guidance on finfish aquaculture in Puget Sound, since most data comes from other systems. The specific impact of switching from Atlantic salmon to steelhead trout, as Cooke proposes, is also unknown. In contrast, Cooke Aquaculture's previous violations of permits and recommended management practices are well-known. To protect the Salish Sea and guide responsible aquaculture practices, Ecology needs as much monitoring information as it can gather.

Washington law limits Ecology in what kind of water and sediment quality monitoring information it may use to regulate net pen operations: a loophole written to protect the industry. But the law does *not* prevent Ecology from requiring polluters to gather more information—even if Ecology's hands are currently tied in using that information to regulate the industry. Therefore, Ecology should take advantage of the opportunity to learn as much as possible about how net pens may impact marine water quality and benthos. More detailed monitoring information can be used to inform future efforts to 1) change the state code limiting how marine net-pens can be regulated; 2) provide useful, ecologically sound guidance to the aquaculture industry, which is currently lacking.

Current monitoring requires only a few grab samples throughout the year that serve as a “snapshot” of conditions during critical periods. Yet this crops too much information out of the snapshot. Infrequent grab sampling may miss violations of standards that occur during other times. It does not provide information on natural patterns in local water and sediment



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surrounding the net pens, or information on how far away from net pens impacts may persist, or for how long. It also does not tell the story about if, and how, periods of “fallowing” net pens between harvest helps local conditions “recover”, which Cooke claims. Ecology must require monitoring that provides a time-series and spatially explicit picture of the year-round water quality and sediment quality patterns in, around, and beyond the net pen sediment impact zone. Rather than using Puget Sound averages or 30-year-old reference conditions for comparison, each net pen site should have a nearby reference site against which its monitoring data is to be compared. The Forum also recommends monitoring of additional biogeochemical parameters, such as sulfides and levels of oxygen in sediment. Lastly, we encourage Ecology to use the 30-year dataset generated by its own in-house Environmental Assessment Program to update the reference tables in the current NPDES permits to reflect current knowledge.

We do not have enough information to answer the question “Can we have responsible aquaculture in Puget Sound and still support salmon recovery?” Ecology has already taken a few small steps toward helping to answer that question. The Forum encourages Ecology to continue down this path by increasing the monitoring rigor it requires of Cooke Aquaculture in its NPDES permit modifications. Ultimately, this information will help us decide if aquaculture should be a part of a healthy, functioning Salish Sea ecosystem, upon which Snoqualmie River salmon depend.

Thank you for your consideration of these comments from the Forum. If you have any questions, please contact Elissa Ostergaard, Salmon Recovery Manager, at (206) 477-4792 or [elissa.ostergaard@kingcounty.gov](mailto:elissa.ostergaard@kingcounty.gov).

Sincerely,

Cindy Spiry, Chair, Snoqualmie Watershed Forum

Henry Sladek, Vice-Chair, Snoqualmie Watershed Forum