



Skagit Audubon Society

P.O. Box 1101
Mount Vernon, WA 98273

June 8, 2020

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

Re: Application by Cooke Aquaculture for modification of NPDES permit to substitute triploid rainbow trout/steelhead for Atlantic salmon

Dear Ms. Niewolny,

Skagit Audubon Society is the National Audubon chapter focused on Skagit County. Our 276 member families share our chapter's mission of protecting and restoring wildlife habitat with particular, but not exclusive, emphasis on birds. We are writing to offer comments concerning Cooke Aquaculture's application to the Department of Ecology to modify its National Pollutant Discharge Elimination System (NPDES) permit. This request by the applicant is in conjunction with its desire to use its existing facilities, such as the net pens near Hope Island in Skagit Bay, to raise sterile all-female Rainbow trout/steelhead because state law now requires phasing out raising Atlantic salmon. Our Audubon chapter, along with many other groups and individuals in Skagit County, has been particularly interested in Cooke Aquaculture's operations here since the catastrophic failure of its facilities near Cypress Island with the subsequent escape of many thousands of non-native Atlantic salmon.

We support the comments submitted to you by the Our Sound Our Salmon coalition, led by Wild Fish Conservancy. We respect the high level of expertise in these comments and urge you to apply the suggestions to your examination of Cooke Aquaculture's application. In addition, we would offer a few additional considerations arising from our particular focus on birds, including those in the marine environment.

For five years not long before the 2017 collapse of the net pen off Cypress Island, one of us (Tim Manns) boated monthly to Secret Harbor on Cypress to survey birds as a volunteer for the Samish Tribal Nation's Department of Natural Resources. Going to Secret Harbor, the boat's route was directly past the net pens located off the harbor's mouth. Particularly from fall through early spring, there were often large numbers of Surf Scoters close to the pens. The population of Surf Scoters wintering in the Salish Sea has declined by about 50%, and they are one of several bird species now used as indicators in the state's plan to clean up Puget Sound. Near the net pens there were often also one to several pairs of Marbled Murrelets, listed as Endangered under Washington State law and Threatened under the federal Endangered Species Act. Other seabirds in the near vicinity of the net pens included Pelagic Cormorants, Red-necked and Horned Grebes, occasionally a few Western Grebes (declined by over 90% in Puget Sound), Rhinoceros Auklets, and others. We would expect similar bird species to be attracted to the fish farm by Hope Island, which, unlike Cypress Island, is one of the facilities for which the NPDES permit modification is being requested.

~ to conserve and restore natural ecosystems, focusing on birds, other wildlife, and their habitats for the benefit of humanity and the earth's biological diversity ~

The comments in the Our Sound Our Salmon letter to you mention the excess fish food which leaks from the net pens and attracts wild fish to the pens, thus subjecting them to the other things fed or administered to the penned fish. These other substances, as detailed in Cooke Aquaculture's application, include the carotenoids Canthaxanthin and Astaxanthin to color the fish flesh and for other purposes, antibiotics, and other medications. It is of course impossible to confine these chemicals within the net pen itself, just as it is impossible to confine the high outputs of phosphorus, nitrogen, and other substances from the massive amount of fish waste and from fish that have died in the pens.

Just as it is important to evaluate the effect of these pollutants on wild fish, including ESA listed species, we request that you consider the direct, indirect, and cumulative effects of these substances on marine birds in the vicinity of the Hope Island net pen and in areas to which tides and currents would carry these substances. We are particularly concerned about the potential effects on such fast declining and specially protected species as the Marbled Murrelet and ones not yet state or federally listed, but headed that way, as the Western Grebe. Although the focus of Cooke Aquaculture's application is on fish, there are many other species of wildlife which could be affected by what the company wants to do, and those potentially adverse effects should be thoroughly examined before any permit is issued.

We would also note the recognized significance of the project location to birds. National Audubon and its partner organization Birdlife International some years ago designated Skagit Bay, where Hope Island is located, as an Important Bird Area of global significance (<https://www.audubon.org/important-bird-areas/skagit-bay>). In 2012 Skagit Bay was recognized as a Western Hemisphere Shorebird Reserve Network site of regional importance for its significance to migrating and wintering shorebirds. The vicinity of the Hope Island fish farm is an important place where very careful consideration needs to be given to effects on all forms of wildlife before an industrial fish farming operation is allowed to continue. The past record of this operation suggests that it cannot do so without very significant effects on the environment and the wildlife for which Skagit Bay is home.

Please direct any questions about Skagit Audubon Society's comments to us at P.O. Box 1101, Mount Vernon, WA 98273, president@skagitaudubon.org (425/ 210-8337) or conservation@skagitaudubon.org (360/333-8985).

Sincerely,

/s/ Jeff Osmundson

Jeff Osmundson
President
Skagit Audubon Society



Timothy Manns
Conservation Chair
Skagit Audubon Society