



DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT

MEMORANDUM

Date: June 4, 2020
To: Laurie Niewolny, Water Quality Program
Washington State Department of Ecology
From: Morgan Smith, City Manager
Heather Wright, Director of Planning and Community Development
Subject: Cooke Aquaculture Pacific NPDES permit applications to raise steelhead

The City of Bainbridge Island (City) offers the following comment based on our understanding of the application and the following assumptions:

- Atlantic salmon net-pen farming will be phased out in Washington by 2025 under legislation passed by the state Senate ([Seattle Times 2018](#)).
- It appears that the Atlantic salmon currently farmed are reproducing, as the SEPA checklist states, “Domesticated stocks of triploid Rainbow Trout/steelhead have very similar physiological and metabolic requirements to those of domesticated stocks of Atlantic Salmon. The basic difference is that all-female triploid Rainbow trout/steelhead are known to be reproductively sterile...”
- The SEPA mitigating provisions include measures to prevent escapement, track the error rate for reproducing fish on each lot of fish transported to the net-pens, and regulate disease.
- The SEPA determination adopts the 1990 Programmatic EIS for net-pen fish farming, which states that adoption of the “*Guidelines*” and the NPDES permit will ensure that no significant adverse water quality impacts occur as a result of floating fish farm development (pg. 40).
- The SEPA mitigating provisions do not address water quality impacts, but the analysis states that WDFW defers to ECY to protect water and benthic quality through their NPDES permit process. A new NPDES permit was issued in 2019 for the current operations with more frequent water quality monitoring than the previous permits.

The City raises the following concerns related to potential water quality impacts:

- **The fish feed composition and amounts are expected to be similar to existing conditions, but the proposal to change species is being evaluated on its own merits. Therefore, the feed used for the native Rainbow trout/steelhead should be evaluated on its own merits as well. The City requests that the specific impacts to water and benthic quality that result from the fish feed used in native Rainbow trout/steelhead be clearly identified, in order for Ecology to determine if NPDES permit conditions will prevent adverse impacts to water quality. The specific impacts, as identified by ECY, should be made available for the next round of public comment.**
- It is unclear if the “*Guidelines*” as discussed in the EIS are included in the applicant’s current proposal or the NPDES permit requirements. Being that the “*Guidelines*” are nearly 30 years old,

they should be updated to reflect best-available science. The City requests that Ecology ensure that the applicant's proposal includes updated operating procedures to ensure that significant adverse water quality impacts will not occur.

- The City is concerned about the repeated regulation noncompliance that has been reported to the Department of Ecology (2016-2017) and insists that measures be in place for ongoing tracking of permit compliance.