



## Cooke Aquaculture Pacific

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Ms. Laurie Niewolny  
WA Department of Ecology  
SW Regional Office  
PO Box 47775  
Olympia, WA 98504-7775

June 8, 2020

**Re: Public comment in support of the Cooke Aquaculture Pacific requested NPDES permit modifications to rear native finfish in marine net pens**

Dear Ms. Niewolny:

Thank you for the opportunity to comment on the proposed NPDES permit modifications. As you are aware, Cooke is proposing to transition from raising Atlantic salmon to raising sterile all-female triploid Rainbow trout/steelhead (*Oncorhynchus mykiss*) at the marine net pen facilities. The all-female, triploid Rainbow trout/steelhead stocks were selected because the use of mono-sex and sterile stocks of fish in aquaculture is recognized as a well-known method to significantly reduce potential genetic interaction with natural populations.

The net pen cultivation techniques, feed ingredients, fish health practices, feed delivery systems and feed monitoring procedures for rearing all-female triploid Rainbow trout/steelhead will be fundamentally the same as those we have used in the culturing of Atlantic salmon. Both fish have the same or very similar physiological characteristics, and the same or similar biological and nutritional requirements. Modern salmonid feeds are composed of highly digestible ingredients that are specifically formulated for optimal growth and meeting the metabolic requirements of the cultured stocks. The commercial feeds used for both salmon and trout are nearly identical, with most trout diets possibly containing slightly lower lipid levels than some commercial salmon feeds. Feeding the fish is both an art and a science, and Cooke has a team of highly dedicated individuals to perform that duty during the 450 plus days (15 to 22 month) of the fish's marine growing phase. Farm managers, feeding technicians and farm site employees work hard every day at ensuring the fish are being well cared for and that includes being properly fed. This is agriculture and the people we employ are farmers at heart, and just like a farmer who takes pride in successfully growing a beautiful crop of apples, wheat or cattle, our employees are gratified by what they are doing. Their goal at the farm sites is to carefully track the fish populations, the daily feed amounts, the growth rates and the water quality in order to achieve the best feed conversion rate for their fish. This means feeding the fish in a way that minimizes excess or wasted feed and optimizing the feeding process from start to finish. Irrespective of your opinion about salmon farming, we owe a debt of gratitude to all the people involved in agriculture, fishing, harvesting, processing, transporting and providing food security for our communities, especially in the recent very challenging times we are all facing.

Based on our growth projections for all-female triploid steelhead, the marine growing cycle will be shorter by 4 to 7 months compared to the previous production cycle of Atlantic salmon. The trout will be harvested at a smaller average weight (approximately 7 to 8 pounds) rather than what is primarily the average harvest weight (11 -12 pounds) for Atlantic salmon. The market preference for smaller average weight trout coupled with the projected growth rates of the all-female triploid steelhead will result in the total standing stock (biomass level) of these farm sites to be less per cycle than previously was achieved during past Atlantic salmon production cycles. The shorter production cycle for the trout (first fish in-last fish out) will in turn also shorten the time between net pen fallowing cycles. Fallowing a farm location is a well-known and widely used agricultural practice that achieves several biological benefits to the health and welfare of the crops being raised. There are also benefits to the surrounding environment from the biological break in production during routine fallowing periods.

Because there will be no substantive differences in the feed ingredients, a reduction in total standing biomass per cycle, and an increase in the fallowing frequency, there is no reason to believe these sites will not continue to meet the state water quality requirements and sediment management standards which they have been meeting since 1996 when the first NPDES permits were issued.

We are hopeful this change begins a new chapter in Washington's marine aquaculture industry. Cooke believes that as a society we will require both sustainable capture fisheries and improved aquaculture production to meet the future challenges of global food security. Both of these forms of food production currently coexist and are vital in meeting future demands. The human population is projected to increase by 2 billion people over the next 30 years from 7.7 billion to 9.8 billion (UN FAO, 2018). An increasing population will only put further pressure on global capture fisheries which currently are at their maximum sustainable yield. We believe that our proposal to raise all-female triploid steelhead in the marine net pens is the next step forward in meeting increasing demands for healthy, affordable and sustainably produced seafood while continuing to reduce risks to the environment in which we grow our fish.

Thank you again for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink, appearing to read 'K. Bright', written in a cursive style.

Kevin Bright, Permit Coordinator  
Cooke Aquaculture Pacific