



June 8, 2020

Laurie Niewolny  
WA Department of Ecology  
PO Box 47600  
Olympia, WA. 98504-7600

**Re: Cooke Aquaculture NPDES Permit Modification**

Dear Ms. Niewolny,

I am writing in full support of Cooke Aquaculture Pacific's request for a modification to its National Pollution Discharge Elimination (NPDES) permit to allow for the raising of sterile native steelhead trout in place of non-native Atlantic salmon at its four net-pen facilities in Puget Sound at Hope Island, Fort Ward, Orchard Rocks and Clam Bay.

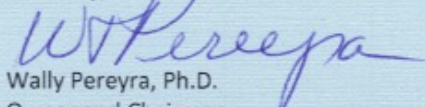
As a former NOAA fisheries scientist, Vice Chairman of the North Pacific Fisheries Management Council and a founding member of King Country's Kokanee Working Group focused on restoring the endangered Lake Sammamish kokanee salmon, the scientific evidence in this ruling clearly demonstrates to me that there is no scientific basis for denying Cooke's request for a modification to their NPDES permit. Both steelhead trout and Atlantic salmon are Salmonid species with similar farming requirements. There is no reason to believe that the environmental requirements of these two similar species or their impacts would differ. If anything, the proposed native triploid steelhead should be less impactful due to its sterility.

Since the late 70s, I have been an active participant in the North Pacific groundfish fisheries, in particular the Bering Sea pollock fishery, one of the largest whitefish fisheries in the world. In addition, for the last 10 years I have been heavily involved in the development and operation of a semi-intensive tilapia farm in Guatemala. My involvement in farm-raised tilapia came about because I realized that aquaculture was and is the wave of the future as regards feeding a growing world population. This reality is clearly apparent in the newly released UN FAO biannual report, "State of World Fisheries and Aquaculture", which estimates overall aquaculture production for human consumption will rise more than 30% in the next decade to 204 million metric tons while wild capture production will remain flat.

NOAA Fisheries estimates that the US imports more than 80% of the seafood we eat and further that more than half of that imported seafood is from aquaculture. Alarming, the supply train of imported seafood into the US suffered greatly as a result of the recent corona pandemic. This new reality raises serious concerns regarding US food security which, together with our increasing demand for seafood, adds additional importance to the decision regarding Cooke Aquaculture's NPDES permit modification request.

One would expect that in judging the merits of the subject permit application The Department of Ecology would engage responsibly and base its decision on the science, and not on emotional opposition by some devoid of factual support. Rural jobs and a growing population of seafood consumers in Puget Sound need locally and responsibly produced, sustainable seafood. Approval of the Cooke Aquaculture Pacific permit modifications is a responsible step in that direction.

Sincerely,

  
Wally Pereyra, Ph.D.  
Owner and Chairman

