

Ecology should not approve Cooke Seafood's application for the following reasons.

1. Ecology is prematurely soliciting public comments before all information is available for public review. Cooke has not submitted information on how to easily identify farmed fish and has not submitted required pollution control plan.

2. According to the WDFW Approval of Cook Marine Finfish Aquaculture Permit, "Mitigating Provisions" under "Operations" (9, 10,11), "Escape Prevention" (1,2,4) and "Pathogen Reporting" (7,8,9) Cook is to submit records of stocking complications, fish escapes, monthly feed, biomass & disease control, carcass discard, etc. This important information depends on Cook's self-reporting with monitoring allowed. Given Cook's history of poor maintenance and monitoring Cook should not be allowed to self-report.

As well, in the past the WDFW, DNR and DOE failed to provide sufficient monitoring. An approved Marine Engineering Firm doing net pen inspections every 2 years is not often enough to oversee structure conditions.

3. Uneaten fish foods which escape the pens are of significant concern as some settle on and affect the substrate environment. Also native, untreated fish consume drifting food which exposes them and the waters to diseases and food pollution. The permit documents do not provide information on the fish food composition which results in unknown impacts to the water quality. Page 14 of the individual permits has table information resulting in the following estimated totals of annual fish food pounds: Clam Bay = 6,360,000; Fort Ward = 4,820,000; Orchard Rocks = 7,490,000. This equals an annual food distribution of 22,040,000 lbs. within a close area of Rich Passage. Hope Island in Skagit Bay, where the waters are shallow, has an annual food distribution of 3,370,000 lbs. Ecology should be concerned that there is no supportable estimate given of the quantity of uneaten food.

4. The individual permits also provide a table of estimated fish mortality in pounds (page 18) which annually total 252,000 lbs. of dead fish in Rich Passage and 60,000 lbs. in Skagit Bay. It is unknown how often dead fish are identified and removed from the crowded net pens and how they are disposed. Unless, of course, you trust self-reporting. This is certainly a higher density in a confined area than "naturally" occurs.

5. The permits provide no estimate of fish waste (excretion) pounds which fall outside the net pens. When the tides and currents are not running the waste settles on the substrate and effects water quality.

There is no data base of existing water conditions at the four sites prior to the net pen installations to determine how much water quality is affected by these operations. In which case Ecology should not review the permits as "modifications", deny the permits and require an EIS.

Janet Marx
112 Lockerbie Pl
Port Angeles, WA 98362
360-457-6605