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Past experiences and ongoing patterns of behavior with this net pen operator alone should be enough to deny permit modifications and the continued operation of net pens in Puget Sound. Without incorporating the additional corrective measures as bulleted below, it is difficult to assess, control and mitigate critical aspects of the NPDES permit. We are asking the Department of Ecology to strongly consider each of the points below that have the potential to: provide needed information, improve water quality standards and reduce the risks associated with the net pen operations, and those designed to increase transparency:

- * Discussions to modify the NPDES permits should be tabled until the lifting of Governor Inslee's Stay Home, Stay Healthy proclamation has ended and Washington residents are afforded the opportunity to comment in the communities where these net pens currently operate.
- * Discussions to modify the NPDES permits should be tabled until related lawsuits challenging the Department of Fish and Wildlife are concluded.
- * We recommend that the guidance be updated with current science and best industry practices with respect to raising steelhead in marine net pens.
- * No decision to modify the NPDES permits should be made until the public has a chance to comment on State of Science on Net-Pen Aquaculture in Puget Sound, Washington.
- * Any modification of the NPDES permit should be conditioned on strict adherence to inspections that are required "approximately" every two years and any other legally-binding provisions.
- * A decision to modify the current NPDES permit should be tabled until all pens are inspected and deficiencies addressed.
- * Ecology should require and internal and external audit to ensure the reliability of training and emergency response protocols.
- * Utilize a clean set of predator nets or some other type of barrier after harvest to prevent predation by marine mammals and reduce the chance of fish escapements or disallow the partial stocking of pens in a particular net pen array.
- * Require proof such as photo evidence or videos to document that containment measures are in place for activities related to structural maintenance that have the potential to impact water quality.
- * Implement a specific collection interval...weekly, bi-weekly related to the collection of recyclables like pallets and feed bags to reduce the likelihood of discharge to State waters.
- * Any washing of containers that hold dead fish should be prohibited to prevent discharges to State waters.
- * Parking of personal vehicles over water should be prohibited to prevent accidental discharges to Washington State waters.
- * Nets, after removal have been stored on the dock in the past and Ecology can prevent unwanted discharges to Washington State waters by requiring that they be removed directly by barge.
- * Strict adherence to provisions related to the net cleaning requirement that at the end of the growing cycle, after the fish have been harvested out, that nets are removed from the water and transported to a land based cleaning and repair facility.
- * The Feed Conversion Rates (FCR's) and Specific Feed Rates (SFR's) calculated by the Department of Ecology should be made available in the PARIS website.
- * We recommend that a model for calculation and visualization be developed and additional data be added to the DMR data available to the public. These would include but not be limited to:

- * Starting number of fish
- * Number of number and weight of harvested fish
- * Monthly Average Weight of Fish (based on sample)
- * Monthly mortalities
- * Update AKART parameters for the current NPDES Permit.
- * We recommend that production maximums be reduced to align with historical levels.
- * We encourage Ecology to test the outflow from harvesting activities to ensure their compliance with water quality standards.
- * Ecology should absolutely consider Cooke's record in its decision to modify NPDES permits.