

Liisa Wale

Hello -

My name is Liisa Wale and I live in Bellingham, WA. I am writing to you regarding Cooke Aquaculture's Application For Water Quality Permits. Due to the many problems with Aquaculture and how it effects the already existing fish and waters I am very concerned about this application. If this is approved what will it do to fishing communities and the waters that surround us.

First of all Ecology should not authorize Cooke's modified NPDES permits until the ongoing lawsuit challenging the State Environmental Policy Act (SEPA) environmental review process and determination is complete. No permitting or leases should be authorized until the Court reaches a decision in this legal matter, as additional environmental review could unveil new or presently unknown pollution and water quality risks posed by this expansion and extension of net pen aquaculture that would need to be addressed or incorporated into NPDES permits.

I have been hearing that there is substantial new information that was not considered during the SEPA process. The SEPA determination issued in January, 2020 (Mitigated Determination of Nonsignificance (MDNS)), requires Cooke to prepare and submit a plan for marking steelhead that will distinguish fish from their pens from hatchery-raised fish swimming freely in Puget Sound. That plan is not part of this record, and review of the NPDES permit application should await that filing. If there is a plan underway then NPDES review should include engineering data on the new pen structures in order to assess the adequacy of those pens for Puget Sound's dynamic conditions, and the escape risk and other risks the new pens might pose to Puget Sound.

Lastly, switching species does NOT reduce the rampant daily pollution and water quality risks posed by open water net pen aquaculture. Ecology should not limit the scope of their review to risks associated with a change of species. Decades of experience and research shows real effects on water quality in a plume around the net pens, which the terms of Cooke's current permit application does not eliminate. This NPDES review should re-examine existing data on effluents from industrial products, medicines, feed, fish waste, and dead and rotting fish to assess whether the current plans eliminate all of those risks.

Ecology should not issue NPDES permits until Cooke has initiated and received agreement from all local, state, federal, and tribal governments. Tribal governments have already requested government to government consultation with the State over Cooke's NPDES permit application, and at least seven tribal governments submitted comments during the SEPA process expressing concerns over Cooke's proposal and requesting the Department of Fish and Wildlife withdraw their SEPA determination that ended the environmental review process and require a comprehensive environmental impact statement. Many counties and municipalities have established rules which need to be brought into account.

Thank you for listening and taking my comments into consideration.

Kind Regards,

Liisa Wale