

April Atwood

Several issues need to be considered as part of this application.

1. Ecology should not issue Cooke's modified NPDES permits until the ongoing lawsuit challenging the SEPA environmental review process and determination is complete.
2. Ensuring compliance of rules set by NPDES permits is crucial. Cooke has not complied with these rules in the past, with disastrous results. There is no reason to assume they will comply with the rules going forward.
3. Switching species does NOT reduce the rampant daily pollution and water quality risks posed by open water net pen aquaculture. Ecology should reconsider all water quality risks associated with this industry and not limit the scope of their review to risks associated with a change of species. These risks include problems associated with fish effluent and waste, amplification and discharge of pathogens, and discharge of antibiotics and medical effluent.
4. The adequacy of Cooke's escape prevention and escape response plans must be carefully considered in this permit process.
5. Ecology should not issue NPDES permits until Cooke has initiated and received agreement from all local, state, federal, and tribal governments.