



Friends *of the* San Juans

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To: Department of Ecology
From: Lovel Pratt, Marine Protection Program Director
Date: June 8, 2020
Subject: Comments on Cooke Aquaculture Pacific NPDES permit modification applications

Submitted via the comment portal: <http://wg.ecology.commentinput.com/?id=BJeUR>

Friends of the San Juans represents over 2,000 members and works with diverse stakeholders, including citizens, committees, tribal and governmental agencies, and other non-profit organizations in the transboundary region of the Salish Sea to protect and restore the San Juan Islands and the Salish Sea for people and nature—since 1979.

Friends of the San Juans is very concerned about the National Pollutant Discharge Elimination System (NPDES) permit applications from Cooke Aquaculture requesting to modify its existing water quality permits for four Salish Sea net pens. Our concerns remain even though Cooke Aquaculture wants to raise all-female, sterile rainbow trout/steelhead, which are native to Washington, instead of non-native Atlantic salmon. The continued open-water operation of fin fish net pens within the Salish Sea threaten native fish, shellfish and all wildlife; cultural resources; livelihoods; and the quality of life for both residents and visitors.

Friends of the San Juans was a co-petitioner that led to the federal listing of the Southern Resident Killer Whales as an endangered species under the Endangered Species Act (ESA). The protection and recovery of the Southern Residents continues to be one of our top priorities. We are very concerned about Cooke Aquaculture's net pen impacts to the critically endangered Southern Residents and their critical habitat and prey.

Washington State has made significant investments in the protection and recovery of Southern Resident orcas and Chinook salmon. The continued operation of these Concentrated Animal Feeding Operations, regardless of the fish species raised in these net pens, puts at risk the progress made to date on the recommendations from the Governor's Southern Resident Orca Task Force.

A SEPA review of these NPDES applications should be required. A SEPA review will show the need for a new and thorough environmental review of open water fin fish net pen operations in the Salish Sea and a new Environmental Impact Statement before Cooke Aquaculture's NPDES applications can be processed.

The economy in the San Juan Islands, and much of coastal Washington State depends on a healthy environment. The continuation of native salmon and the Southern Residents is also an important part of our shared human culture. The significant concerns over the negative impacts of finfish net pens that led to broad public support for the phasing out of net pen facilities in the Washington State waters of the Salish Sea are not addressed simply by replacing Atlantic salmon with a native species.

Thank you for this opportunity to comment on these NPDES permit modification applications.