

Tracy Ouellette

As a resident of Skagit county and beneficiary of our coastal waters, I do not feel that Washington state should continue to allow aquaculture in coastal waters to risk the health and safety of our ecosystem. Risk of escape, disease, compromise of native fish and marine mammal populations and compromise of water quality are too great.

First, 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. Given the magnitude of scientific evidence WDFW failed to consider during the review, it's possible the Court could render this determination invalid and require WDFW to reinitiate the SEPA process to conduct additional environmental review such as an environmental impact statement. 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.

New information that was not considered during the SEPA process includes how aquaculture fish will be identified, how escape would be managed, any new infrastructure that is being planned

Second, Cooke Aquaculture has violated permits in past operations, including failure to inspect and maintain equipment and failure to report and manage escaped fish and there is no way to ensure compliance in the future.

Third, HB 2957 created new and stricter regulations for marine net pen aquaculture and any new permitting must be resubmitted following those regulations rather than just relying on previous permits. Consistent with that law, management of any aquaculture should have a goal of eliminating escapement and degradation of water quality, and eliminating risk to native species. Pursuant to this goal, aquaculture should be discontinued. If pursued, no matter the species, there is ongoing risk due to fish effluent, fish waste, concentration-related risk of parasites and disease, medical effluent due to treating or preventing such disease, and escape of fish threatening already at-risk native populations.

Please do not continue to allow these unacceptable and irreversible risks to our Salish Sea ecosystem, and do not approve continued operations of Cooke Aquaculture.

Thank you for your attention.

Tracy Ouellette, MD