

Shaun Hubbard

As a resident of the San Juan Islands, as an advocate for wild fish and their habitat, as a lifelong Washingtonian who has seen the disappearance of so many of our natural resources, I am greatly concerned about the switcheroo that Cooke Aquaculture is proposing for their Puget Sound net pens. The disastrous mismanagement of Cooke's Atlantic salmon pens should be warning enough to say that no National Pollutant Discharge Elimination System (NPDES) permits should be granted no matter what is in those pens. Cooke didn't follow the law which led up to the 2017 pen collapse, what is to ensure they will in the future? Is switching to a new product supposed to be automatically OK? No! Does Cooke's application fully address all the risks? No! This is what needs to be considered:

The risks of water pollution from a net pen are there no matter what is in that pen. 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.

Cooke's new fish of choice are not 100% infertile fish and they are considered a pollutant. What preventions are in place to ensure that there are NO escapes? An "escape response plan" is too little too late.

No permitting or leases should be authorized until the Court decides on the legal challenge to WDFW's decision to issue an MDNS, stifling the SEPA review process. And no permitting or leases should be authorized until all local, state, federal and tribal governments weigh in.

Washington's 2018 law, HB 2957, banning Atlantic salmon net pens set a new standard of safety to our environment. Can Cooke hold to those standards? The law dictates that Cooke needs to prove that their proposed new operations "eliminate...escapement and to eliminate negative impacts to water quality and native fish, shellfish, and wildlife."

Thank you for this opportunity and for your consideration of my comments.