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The steelhead Cooke proposes using in their net pens are highly-domesticated, biologically-altered to be partially-sterile, and genetically dissimilar to wild stocks. Similar to nonnative farmed Atlantic salmon, these fish are considered and regulated as a pollutant under the Clean Water Act if they escape into public waters.

As escape has happened REPEATEDLY AND WILL HAPPEN AGAIN, escape prevention and the adequacy of Cooke's escape prevention and escape response plans must be carefully considered in this permit process. The determination from the SEPA review process requires Cooke to develop a "no-recovery" option to be added to their escape response plan, which is not included in these NPDES application materials. The NPDES review must be based on their full escape plan, not this incomplete record. The SEPA determination also required Cooke to develop a plan for marking their domesticated stock (clipping the fins) to distinguish them from free-swimming wild and hatchery steelhead. That marking plan is not included in these NPDES materials, but is an important aspect of escape recovery.

Despite treatment to render the fish infertile, many fish in the pens will be capable of reproducing. When a net pen collapses, it will release more fertile female steelhead than exist in many endangered wild steelhead runs. When an escape happens, it will be nearly impossible to manage a recovery effort that removes farmed steelhead and does no harm to endangered wild steelhead and bull trout, endangered and threatened salmon, endangered southern resident killer whales, and other protected wildlife in Puget Sound.