

Richard Strom

The additional risks in the proposal to introduce domesticated, biologically-altered, steelhead/rainbow trout and standards laid out in the 1990 EIS have not been met.

The Mitigated Determination of Non-significance (MDNS) issued by WDFW in January 2020, requires Cooke to prepare and submit a plan for marking steelhead in ways that will distinguish fish from their pens from hatchery-raised fish swimming freely in Puget Sound. That plan is not part of the record, and review of the NPDES permit application should await that filing.

The MDNS also requires Cooke to submit a plan for a "no-recovery response" to escapes. That plan is not part of the escape plan submitted in Cooke's application, and it is impossible to assess the adequacy of Cooke's pollution prevention plan until that plan is included in the application.

The 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.