

# Jaime Beechum

Cooke Aquaculture Pacific NPDES permit applications to raise steelhead

I am writing to comment and express concern on the Cooke Aquaculture Pacific NPDES permit application to raise steelhead in the waters of the Puget Sound.

The action of Cooke applying to raise a single species in a similar manner as they previously were raising Atlantic Salmon shows that the information and scientific research that has been gathered through observation and experience is not being applied to practice of raising fish for consumption in public waters. If it were, totally different practices would have been created. Maintenance of pens should be more frequent than every two years, disease inspection should happen more frequent than every year, this should be a bi-weekly, or monthly practice to track and evolve current practices. The topics for concern are the excess fish waste, medicinal feed waste, environmental impact, and escape consequences on the overall ecosystem. Waste in a concentrated area has negative effects on the overall ecosystem including other marine wildlife as well as the consumer. If Cooke would like to raise a single species and all female population, that is a practice outside the habits of the natural cycle and should be done so on land in a controlled environment. There is no measure that can be taken that can guarantee no escape and the accountability of the company has shown to fall short for their previous actions and degradation. Reciprocal restoration practices should be put into place before any further permitting should be taken into consideration. In addition, The salmonid population is in a great need for recovery and if there were a net breach the steelhead, with a faster growing rate and domesticated feeding behavior, would create much more of a threat for the local population that has been put under strain for things like polluted waters that come from Cooke's originating fish raising practices. The containment of animals in small areas with one species creates an environment for disease and virus to become more prevalent due to the lack of diversity that supports neutrality. By having diseased fish in open waters creates burdens for the overall marine population, not to mention the health threats to the consumer. If any lesson was learned from the Cypress breach, it would be that new and more holistic approaches to raising fish would be more beneficial to the overall impact of the environment and the consumers of the products being produced. Cooke has shown that it has not been compliant with cleaning equipment, maintenance upkeep and following the Washington State of Ecology requests, so how are we holding the company accountable for any of their requested application? The company should not be able to manage their own standards, since they have shown not to uphold the State's requests. I strongly urge the state to reconsider any renewal of permit until Cooke can show a significant upgrade to practices, responsibility to the health of the waters, including revitalization of past incidents and environmental digression.

There is so much evidence out there to support these statements, and it would take many more hours of time I must spend to put a roof over my head and food in my belly to list the expensive reasoning of why these kinds of practices and company allowances should not be permitted. This is the responsibility of the company, and the government to be accountable for.

Thank you for your time,

Jaime Beechum