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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.

2) There is substantial new information that was not considered during the SEPA process.

3) Ensuring compliance of rules set by NPDES permits is crucial.

4) Washington's landmark 2018 law, HB2957, created a new and stricter regulatory regime for marine net pen aquaculture.

5) Switching species does NOT reduce the rampant daily pollution and water quality risks posed by open water net pen aquaculture. Ecology should reconsider all water quality risks associated with this industry and not limit the scope of their review to risks associated with a change of species.

5a. Fish Effluent

5b. Fish Waste

5c. Amplification and Discharge of Pathogens (Viruses, Parasites, and Diseases)

5d. Discharge of antibiotics and medical effluent.

6) The change in species poses new and different risks.

7) Escape prevention and the adequacy of Cooke's escape prevention and escape response plans must be carefully considered in this permit process.

8) Ecology should not issue NPDES permits until Cooke has initiated and received agreement from all local, state, federal, and tribal governments.