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of Ecology (SWRO)

Comments re. Cooke Aquaculture Pacific draft modified NPDES permits modifications to raise steelhead in net pens

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 NPDES permits should be granted no matter what is in those pens. Cooke didn't follow the law which lead 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!

The risks of water pollution from a net pen are there no matter what is in that pen. Washingtonians need to know: what are the full and lasting impacts to our water quality, native wild fish, and the SRKWs population from these proposed net pens -- any net pens?

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."

Not one of Ecology's new requirements (increased monitoring, regular inspections, improved maintenance, and response plans) guarantees there will be no pollution, no disease, no escapement. An "escape response plan" is too little too late. We've seen what happens, why would we risk this all over again? Please, no more net pens in Washington waters.

Thank you for this opportunity to submit these comments.



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