

Laurie Niewolny
Water Quality Program, Department of Ecology
P.O. Box 47600 Olympia, WA 98504

Dear Ms. Niewolny,

Please accept the following public comments.

A bit of background, I moved to the island in 2010 and knowingly bought a home by the fish farm. I thought at the time, it was interesting. Prior to Cooke's ownership, my issues with the owners of the fish farm were mainly about safety issues regarding trucking of food and nuisance issues such as noise, smell, and visible blight that need to be resolved again and again with each new owner. When Cooke took over ownership, instead of an Indonesian company with only a Florida resident address, I was excited after our first meeting with the company. However, I was soon in for a **rude awakening!** Several months later they began violating their NPDES agreement by over water power washing their nets. I spent 38 years working for a global environmentally sensitive company with a strong management culture steeped in honesty, safety, operational integrity, controls, and a "In God We Trust, All Others Bring Data" attitude. My former company strove to be in absolute compliance with both the letter and spirit of all laws. **Cooke's approach was the direct opposite of my former company.** That led me to dig into the regulatory background, science of fish farming, and integrity of Cooke as a global company. The key for an environmentally sensitive industry is managing risk which I truly believe Cooke is not capable of managing the risks of escapement and environmental pollution. **The consequence to a native endangered species, Steelhead, will be disastrous.**

Items in black are our comments. Items in **blue** are quotes from external sources. Items in **green** are from state agencies. Items in **red** are from Cooke.

Risk Assessment

While not a scientist, I personally reviewed all materials and new scientific articles presented to Washington Department Fish and Wildlife for approval to change species of fish being raised. I searched for new scientific research specifically related to raising Steelhead, industry experience with both Steelhead and triploid fish. I found the application lacking.

Cooke has advocated in legislative testimony for permitting based on a scientific basis. However, the proposals in this application are based on an Environmental Impact Statement from 1990 that is only minimally updated primarily for the Endangered Species Act and based on Net Pen Guidance from 1988. Both are geared specifically to Atlantic salmon rather than native species. Scientific studies tend to support conclusions that follow their funding sources. This applies to both sides of the argument, environmentalist and industry. There is conflicting scientific evidence and many of the claims have not been resolved for the purpose of Net Pen Aquaculture regulation in Washington State. Efforts to update Net Pen Guidance based on best available science and practices was halted in 2017.

"There is a rich body of literature about many topics involved in the production of rainbow trout. Feed formulation and improvement, production methods, pollution control, and disease control are research areas that have received much attention. Research at academic institutions and government research stations will likely continue to supply the industry with scientific advances to improve production and help the industry progress in the coming years. As with many forms of aquaculture, little comprehensive research has been conducted and relatively little scientific literature is available on the environmental impacts of rainbow trout farming in the U.S." (Seafood Watch, Farmed Rainbow Trout, 2006,)

Since Cooke is requesting a significant change in species from Atlantic salmon to steelhead that are raised in marine net pens, it should not be permitted to use a 1990 EIS for consideration which assumes the impact and risks are the same. Nothing of this type and scale has ever been done in Washington State. A new EIS is critical so that a valid risk assessment can be performed.

Similarly, the State's regulatory agencies should complete their assessment of net pen guidance since both science and technology have changed in the last thirty years. This guidance would help define mitigation strategies. Using the same set of practices, processes and depreciated facilities will not mitigate the risks associated with the raising of native fish. WDFW has stated in testimony that they are much more concerned about the escapement of native fish.

A more meaningful approach to risk assessment has been advocated in one of the scientific articles that Cooke did cite in their Attachment C – Annotated Bibliography (Genetic Risks Associated with Marine Aquaculture, NOAA, Waples et al. (2012)). This includes both the potential risks and benefits.

“Informed decisions about appropriate use of marine aquaculture are best made following a comprehensive assessment of potential risks and benefits.”

...

“Potential benefits are of two types: benefits to society and benefits to natural populations. Evaluating societal benefits (economic, social, political) involves a host of normative considerations and is not attempted here, but this is a crucial component of any comprehensive risk-benefit analysis.”

Cooke fails to make a strong case for the use of public waters for private gain by supplying any benefits to society or benefits to natural populations to offset the risks associated with the rearing of a native species. The risks associated with a change in species will be addressed in later comments. Some of the areas of concern regarding benefits are described below:

Economic: Somehow the hundreds of jobs stated by Cooke in Washington State legislative testimony have shrunk. The limited number of full-time of jobs potentially impacted are geographically dispersed.

Social: Salmon and Steelhead are relatively expensive food products that are not feeding mass populations. In contrast, Cooke has annual revenues expected to be several billion dollars.

Corporate values were called into question when Animal rights activists recently exposed Cooke practices.

<https://www.fis.com/fis/worldnews/worldnews.asp?country=0&monthyear=&l=e&id=104876&ndb=1&df=0>

Glenn Cooke, CEO of the Cooke family of companies, provided the following statement after the company was contacted by the Maine Department of Agriculture regarding an animal welfare complaint submitted by an activist veganism organization for a Cooke Aquaculture USA freshwater fish hatchery in Bingham, Maine.

“I am disappointed and deeply saddened by what I saw today. As a family company, we place animal welfare high in our operating standards and endeavor to raise our animals with optimal care and consideration of best practice. What we saw today is most certainly not reflective of these standards.

Political: Do the revenues that Washington State receives from Cooke offset the ongoing costs required to supervise their compliance with the state's regulations? Did the money that the State received as part of the Cypress Island incident offset the costs to capture escaped fish and to assess the soundness of their facilities? Does the money that the state receives offset the costs associated with salmon and steelhead restoration?

Benefits to natural populations or environmental benefits: Cooke's proposal will not foster the growth of native fish.

From the Marine Survival Project, Why focus on the Salish Sea: [Of these salmon, Chinook, coho, and steelhead have experienced tenfold declines in survival during the marine phase of their lifecycle, and their total abundance remains well below what it was 30 years ago.](https://marinesurvivalproject.com/the-project/why/) <https://marinesurvivalproject.com/the-project/why/>

Most of the farmed ocean raised steelhead is imported from Norway or Chile and uses production methods similar Atlantic Salmon. Imported farmed trout can be raised in saltwater netpens, which release waste directly in the ocean and escapes potential endanger wild populations unlike farm raised rainbow trout or steelhead which uses environmental sustainable means (Seafood Watch, Farmed Rainbow Trout, 2006,)

Cooke has been recently cited for incidents at their net facilities for overstocking and not conducting environmental testing.

<https://www.seafoodsource.com/news/aquaculture/cooke-to-pay-fine-for-overstocking-maine-salmon-farms-not-conducting-environmental-testing>

"Cooke was cited by the Maine Department of Environmental Protection for a number of incidents at its net pen sites in Hancock and Washington counties, including having too many fish in pens, failing to conduct environmental sampling, and failing to follow a number of procedural measures laid out in the company's operating permit, including on-time filing of pollution sampling reports and fish spill prevention plans."

Facility Condition

Cooke knowingly bought a depreciated facility and took on the existing management to operate it.

Since prevention of escapes in the first place is the most important strategy for dealing with escapement, there appears to be some inconsistencies in the application of the law and lack of coordination between the State agencies.

*Furthermore, DNR, Ecology, and WDFW have inspected each facility at least once since 2017. Finally, as part of the new law that sunsets nonnative finfish marine aquaculture in Washington State (EHB 2957), Cooke is required to have each net-pen facility inspected above and below waterline by an engineering firm approved by WDFW, **roughly every two years when the facilities are fallow**. Transport of fish into the net-pens is contingent on the findings from that inspection. In other words, WDFW will not approve transport permit applications for net-pen facilities whose structural integrity is inadequate.*

Based on the last inspection of Cooke's facilities by DNR during September 2017 through January 2018, an inspection would be due about now. Based on the approval of Cooke's NPDES permit for the Bainbridge facilities on July 19, 2019 an inspection would not be due until 2021 (see citation below).

*The permittee must obtain a marine engineering firm to conduct inspections to assess structural Integrity of the net pens. Inspections **must occur within two years of the effective date** of the permit if not completed and to be done routinely, approximately every two years, when net pens are fallow, and must include current Doppler data, topside and mooring assessments related to escapement potential, structural integrity, permit compliance, and operations. The net pen structural integrity assessment reports must be certified by a licensed professional engineer and submitted to Ecology within 60 days of the completion of the inspections.*

The timing of inspections is out of sync. This is further complicated by Cooke's growing cycles of 12 to 18 months. Currently on Bainbridge, the Fort Ward and Clam Bay pens and only a portion of Orchard Rocks-South

are fallow. Orchard Rock-North is fully stocked. Could Cooke could potentially delay inspections to every three or four years creating an unacceptable level of risk?

We believe that Cooke knowingly purchased facilities in 2016 that were reaching the end of their useful life. The average life span of the net pen structures is 15 years, as stated in Cooke’s DNR lease agreement. Some of the previous management continued to be employed by Cooke and should have understood the condition of the facilities purchased. To our knowledge, all of the Bainbridge net pens were replaced after a 1999 escapement. That would put the Orchard Rock pens beyond their useful life per the DNR lease agreement. In looking at the Mott McDonald Engineering Assessment, it would appear that the prior owner replaced pens at the end of their life. These net pens are continuing to depreciate and deteriorate. No structural analyses were performed by Mott McDonald in 2017 according to their report. The following is our attempt to understand the age and status of these pens:

	First Built	Replaced (1)	Life per Lease Agreement	Last Inspected	Next Inspection Due	Current Status
Fort Ward	1970	2000 (2007 moved?)	2015	November 2017	November 2019	Fallow since 05/2019?
Orchard Rock	1970	2000	2015	December 2017	December 2019	South-partially fallow since March 2019, North-fully stocked
Clam Bay	1970	2000 (2006?)	2015	September 2017	September 2019	Fallow since August/September?
Hope Island	1986	2001	2016	December 2017	December 2019	?
Cypress Island 1	1985	2001	2016			?
Cypress Island 2	Assumes 1985	Assumes 2001	2016	Not applicable	Not applicable	Removed in August 2017 due to escapement
Cypress Island 3	1985	2001	2016			
Port Angles	1990? Based on Google Earth	2002	2017	December 2017	Not applicable	Lease revoked. Net Pen Not removed.

1 Note Replacement dates from Mott McDonald Engineering Assessments are vague and inconsistent

A two-year inspection schedule complicated by the growing cycle may not be adequate as the pens approach the end of their expected life span. After a certain point, perhaps net pen structures should be inspected every time they are fallow and before a fish transfer permit is issued and never partially filled (like Orchard Rocks South is today) so as to cause an inspection delay.

The industry on Bainbridge Island has been grandfather on a 1988 conditional use permit. Cooke’s approach to maintenance and replacement is to piece meal both. This allows them to avoid triggering SEPA and allows them to avoid coming into full compliance with existing regulation and industry best practices.

Pollution

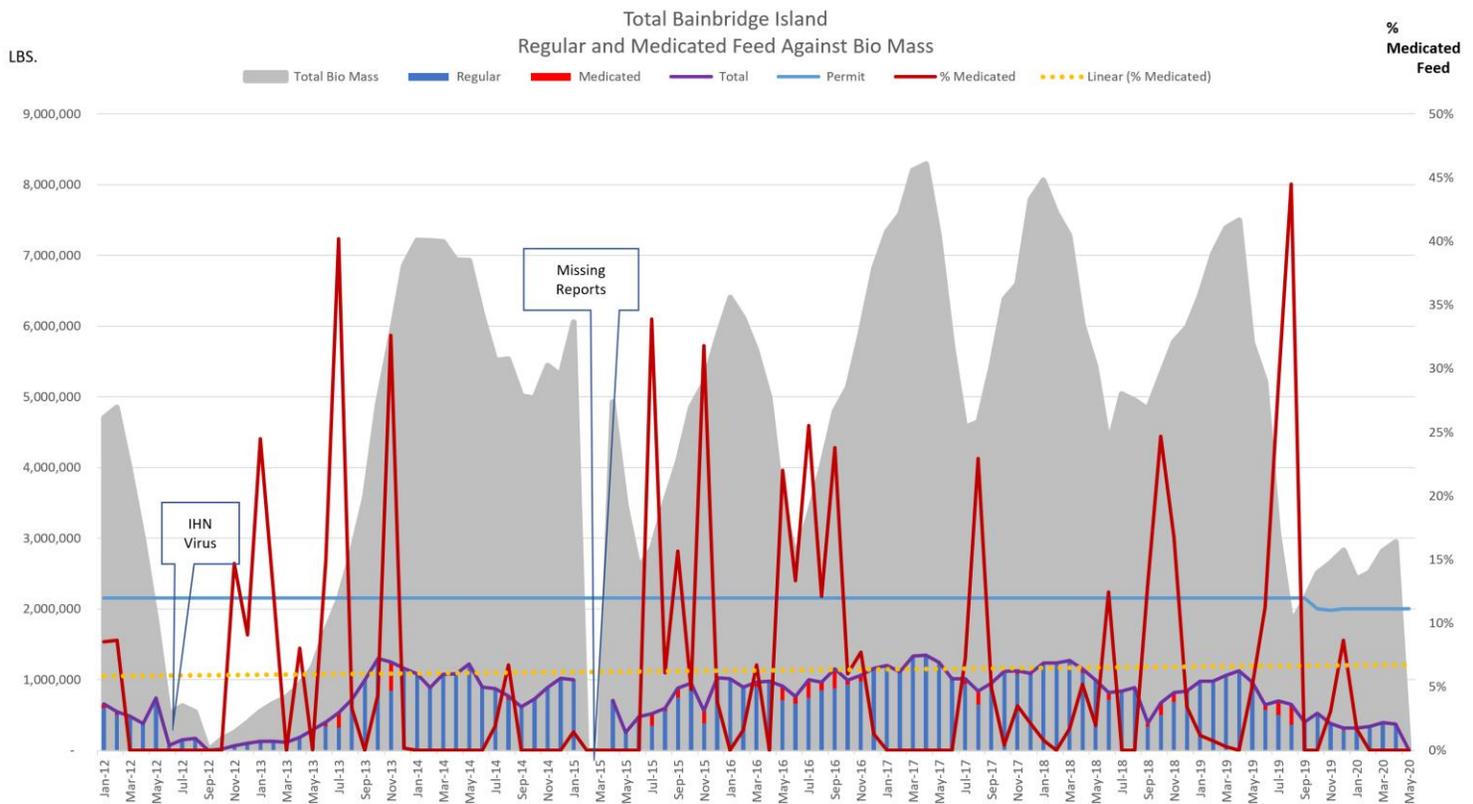
The Department of Ecology has developed a State of Basis which serves as an amendment to the Fact Sheet and describe changes made to the permits that are now up for public comment.

<https://ecology.wa.gov/Water-Shorelines/Shoreline-coastal-management/Aquaculture/Net-pens>

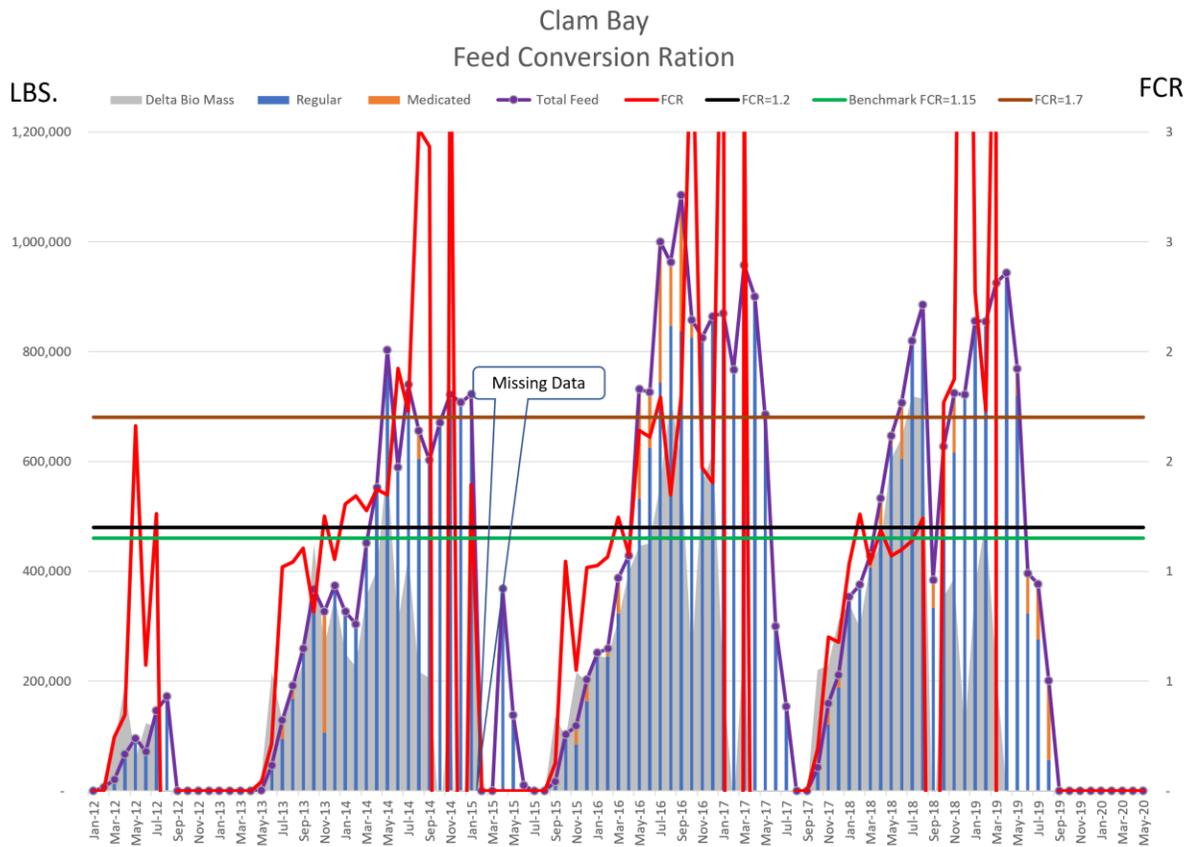
As an existing discharger, state law exempts the modification of Cooke’s wastewater discharge permit from the SEPA process as long as the permit contains conditions no less stringent than federal effluent guidelines and/or state rules and regulations (RCW43.21C.0383). Ecology has assessed Cooke’s switch from non-native Atlantic salmon to native triploid (sterile) all-female stock of steelhead for factors that could affect the characteristics of the discharge. Regardless of species, discharges from finfish

aquaculture operations may contain fish feces, uneaten fish food, disease control chemicals milled into fish feed, biofouling organisms displaced from routine net cleaning, and escaped fish.

When you talk about fish waste, antibiotics, and uneaten feed it is difficult to get a picture of the impact because it all happens underwater. The graphs below are based on monthly data from January 2012 to May 2020 that was submitted to the Washington Department of Ecology by the industry. The period was selected based on current NPDES permits. Total Bainbridge Island (Clam Bay, Orchard Rocks, and Fort Ward Pens) chart shows the total Bio Mass in grey (amount of fish) over 8+ years and the regular and medicated feed (antibiotics). The dark red line shows the percentage of medicated feed over time. With this many fish in the water, there is a significant amount of fish feces as anyone who has had an aquarium or goldfish bowl would know. The percentage of medicated feed in the water is not insignificant.



The second graph shows the Feed Conversion Ratio (FCR) for the largest net pen, Clam Bay. There are approximately a million fish. A perfect FCR is 1.0 or one pound of feed produce a 1 pound gain in a pound of fish. The graph shows industry benchmarks as straight lines for 1.15, 1.2, and 1.7 which represent the best FCR and industry clams. The Red Line indicates the calculated FCR from monthly monitoring data which is outside the industry benchmark lines.



The State Agencies should not ignore Cooke's record

From the public's view point, it is impossible to ignore Cooke's past and **ongoing** behaviors. Cooke purchased the pens in Washington State in 2016. Let's take a look a time line of their corporate behaviors since that purchase in Maine and Canada alone to gain a perspective on how they choose to operate as a company that is "...dedicated to producing a high-quality seafood in a sustainable and environmentally sound manner."

Documented incidents in Washington State:

Date	Description	Source
August 25, 2016	Warning Letter: National Pollutant Discharge Elimination System	Department of Ecology PARIS
May 2017	Anchor Slip/Break Clam Bay	Confirmed by facility personnel and photos.
July 24, 2017	Ecology Illicit discharge noncompliance notification	Department of Ecology PARIS
August 23, 2017	Notice of Violation	Department of Ecology PARIS
AUGUST 22, 2017	It's open season on Atlantic salmon as the public is urged to help mop up a salmon spill from an imploded net holding 305,000 fish at a Cooke Aquaculture fish farm near Cypress Island . In a statement Tuesday morning, Cooke said "exceptionally high tides and currents coinciding with this week's solar eclipse" caused the damage. Cooke estimates several thousand salmon escaped following "structural failure" of a net pen.	https://www.thenewstribune.com/news/local/article168636307.html
October 10, 2017	Just a week after the state Department of Fish and Wildlife approved shipment of 1 million more farmed Atlantic salmon to Cooke Aquaculture's fish farm near Bainbridge Island, another state agency says it has found a hole in the nets and corrosion in the structure of the facility. The Department of Natural Resources on Monday notified Cooke that it is in default of the terms of its lease at its Rich Passage operation. It ordered the facility repaired within 60 days, or the department may cancel the company's lease for the facility, which operates over public lands.	https://www.seattletimes.com/seattle-news/environment/fish-farm-has-60-days-to-fix-net-pens-outside-seattle-as-1-million-atlantic-salmon-move-in/

Date	Description	Source
December 12, 2017	<p>Administrative Order and Notice of Penalty</p> <p>Without water quality protections in place, Cooke Aquaculture Pacific (Cooke) has repeatedly cleaned dirty equipment and discharged polluted wastewater into Puget Sound. Cooke operates commercial Atlantic salmon net pens in Washington state.</p>	Department of Ecology PARIS
December 17, 2017	Cooke Aquaculture must shut down and remove its Port Angeles Atlantic salmon farm after the state deemed it unsafe and illegal and canceled its lease.	https://www.seattletimes.com/seattle-news/environment/violations-prompt-washington-state-to-cancel-atlantic-salmon-farm-lease-at-port-angeles/
January 30, 2018	Cooke Aquaculture Pacific vastly underrepresented the scope of a catastrophic Atlantic salmon net-pen spill at its Cypress Island farm last August and misled the public and regulators about the cause, according to a new report by state investigators that blames the pen collapse on company negligence. The investigation found that Cooke lowballed the number of escaped fish by more than half, and did not do essential maintenance at its farm, causing the escape	https://www.seattletimes.com/seattle-news/fish-farm-caused-atlantic-salmon-spill-state-says-then-tried-to-hide-how-bad-it-was/
February 18, 2018	Cooke Aquaculture inspection finds problems at 2 other Atlantic salmon pens. At the Fort Ward facility in Rich Passage, inspectors found chain links on an anchor line had lost up to 75 percent of holding capacity because of corrosion. At Cooke's Hope Island facility, five miles from the mouth of the Skagit River, inspections conducted by Cooke also "do not appear in accordance with manufacturer's recommendations or industry standards," the report found.	https://www.seattletimes.com/seattle-news/environment/cooke-aquaculture-inspection-finds-problems-at-2-other-operations/

Date	Description	Source
Feb-Sept 2018	Workers hammer rust off Orchard Rocks pens	Personal observations and communication from Ecology
Oct 15-20, 2019	Orchard Rocks net pen sinking due to hole in pontoon	Personal observations and photos
December 18th, 2018	The Washington Department of Fish and Wildlife considers the exotic strain of PRV to be an unacceptable risk to native stocks of Pacific salmon. Under the conditions of its permit, Cooke Aquaculture Pacific was required to destroy the fish.	https://www.seattletimes.com/seattle-news/environment/fish-farmer-destroys-800000-juvenile-atlantic-salmon-due-to-disease-second-purge-in-past-year/
October 22, 2019	"A small hole was identified in one bulkheaded pontoon on the Southeast portion of the Orchard Rocks net pen and we completed the necessary welding repairs immediately today. We will also have an engineer onsite tomorrow to assess the welding repair and pontoon. There were no fish in the corner section of the pen where the pontoon required repair," said a Cooke Aquaculture representative in a statement	https://www.king5.com/article/news/local/no-salmon-released-when-cooke-aquaculture-pen-sinks/281-b4741721-30f3-402a-bd2a-017edcc87b7b

These types of incidents are not just unique to Cooke here in Washington State. Below is a recap of events in North America:

Approximate Date	Description	Source
March 4, 2016	New Brunswick-based multi-national farmed salmon producer Cooke Aquaculture had nothing but bad news during the past month, including yet another product recall from the Canadian Food Inspection Agency (CFIA), a valuable complaint from the mayor of the town housing Cooke's Nova Scotia headquarters and a notice to consumers to avoid eating Cooke's primary product, Atlantic salmon grown in Nova Scotia, New Brunswick and Newfoundland.	http://www.southcoasttoday.ca/content/more-troubles-cooke-aqua-product-recall-do-not-buy-notice-farmed-salmon-loan-demands

Approximate Date	Description	Source
	<p>Government product recalls</p> <p>In late January, CFIA issues a recall notice for salmon products produced by subsidiary True North Salmon, based on evidence that the fish might contain particles of a foreign substance. In 2012, CFIA issues a recall warning when Cooke distributed framed mussels which were alleged to contain marine biotoxins. Also in 2012, three Cooke executives - including CEO and founder Glenn Cooke - faced federal felony charges for dumping gallons of deadly insecticides near their salmon cages in the Bay of Fundy.</p>	
September 11, 2017	<p>Atlantic salmon, believed to be part of a cohort that escaped from a U.S.-based fish farm on Aug. 19, are being hauled in by anglers fishing out of French Creek on mid-Vancouver Island. Cameron Wheatley, owner of the French Creek Store at the marina just north of Parksville, received the head of an apparent Atlantic salmon from a local angler late Sunday morning, Sept. 10. He is freezing the head, along with two more fish heads and one whole farm-raised salmon, to turn over to Fisheries and Oceans Canada</p>	<p>https://fisherynation.com/archives/63166</p>
October 12, 2017	<p>Cooke Aquaculture offered to pay a premium price for Atlantic salmon caught by the Lummi Nation after a major spill from the company's Cypress Island fish farm if the tribe would not advocate getting rid of net pen aquaculture. The tribe tartly rejected the offer. "Your demand to keep quiet for a few extra dollars is insulting," Timothy Ballew II, chairman of the Lummi Indian Business Council, responded in a Sept. 14 letter. Nell Halse, vice president for communications for Cooke, said Wednesday the offer "was not an attempt to muzzle or insult the Lummi Nation, but rather an effort to negotiate toward common ground and respect the interests and concerns of both parties at the table</p>	<p>https://mynorthwest.com/781546/lummi-chairman-calls-bribery-attempt-insulating-and-preposterous/?show=comments#comments</p>
March 30, 2018	<p>Cooke Aquaculture harvested all the fish at its site near Gaultois last October following the detection of five fish with the infectious disease, and did so again in a facility on the south coast of Newfoundland in February.</p>	<p>https://aquaculturemag.com/2018/04/03/isa-virus-found-in-salmon-at-southern-newfoundland-aquaculture-site/</p>
April 3, 2018	<p>Freedom of Information Act request asking for the status of a \$25 million loan extended to Cooke Aquaculture in 2012. A newspaper article disclosed that Cooke Aquaculture is eligible for \$4 million in "loan forgiveness" to fund a university research chair named after the company. The \$800,000 spent by Cooke funded a chair held by an industry friendly researcher.</p>	<p>https://www.halifaxexaminer.ca/featured/cooke-aquaculture-is-eligible-for-4-million-in-loan-forgiveness-to-fund-a-university-research-chair-named-after-the-company/#1. We're giving Cooke Aquaculture a free research cha</p>

Approximate Date	Description	Source
May 17, 2018	For the second time in five years, a Canadian salmon aquaculture firm has admitted in a New Brunswick courtroom to illegally using a pesticide known to kill lobsters for treating salmon off an island that abuts the Maine border. Cooke was fined \$500,000 Canadian.	https://bangordailynews.com/2018/05/17/business/report-canadian-salmon-firm-admits-using-lobster-killing-pesticide-near-maine-border/
August 7, 2018	Between 2,000 and 3,000 fish escaped from Cooke Aquaculture's Hermitage Bay salmon farm on Newfoundland's south coast in July, the company confirms. Incident happened after net extensions were sewn onto a pen at the operation. extensions were sewn onto a pen at the operation. The escape of thousands of farmed salmon on the south coast of Newfoundland is a significant concern, as is the lack of public notification about the incident.	https://www.asf.ca/news-and-magazine/salmon-news/salmon-escaped-from-cooke-aquacultures-farm-company-confirms https://fisherynation.com/archives/tag/cooke-aquaculture
December 14, 2018	British Columbia will phase out 17 commercial salmon farms off the northeast coast of Vancouver Island to aid in the migration and restoration of wild West Coast salmon runs, under an agreement between the B.C. government and Aboriginal First Nations	https://www.seattlepi.com/local/politics/article/British-Columbia-salmon-orca-fish-farm-phase-out-13467254.php
August 20, 2019	A pipe broke at the Deer Island Bay of Fundy Cooke facility while fish were being transferred from a net pen to a boat for sea lice treatment. Initial estimates by Cooke Aquaculture set the total of escapees at 2,500, but company representatives have since lowered that estimate to 1,000 fish, Researchers for the Atlantic Salmon Federation have captured and removed 53 Atlantic salmon from a New Brunswick river	https://www.asf.ca/news-and-magazine/news-releases/salmon-escape-in-bay-of-fundy
October 9, 2019	Maine Department of Agriculture finds that unacceptable fish handling incidents have occurred at the Bingham hatchery after a video went viral.	https://www.timesrecord.com/articles/maine-1/ingham-aquaculture-facility-kept-fish-in-cruel-unsanitary-conditions-group-says/
October 16, 2019	As part of a consent agreement with the Maine Department of Environmental Protection, Cooke Aquaculture has agreed to pay \$156,213 to fund the Marine Rearing Atlantic Salmon Machias River Project, which aims to breed and restore native populations of Atlantic salmon in the Machias River. Cooke violated its operating permit by having too many fish in one or more pens, failing to conduct environmental sampling, and failing to follow a variety of clerical procedures that include timely filing of complete and accurate pollution sampling reports and timely submissions of fish spill prevention plans. The infractions violated the terms of Cooke's operating permit, DEP rules and state law. "The administrative consent agreement was created to determine a path forward and to start anew - wipe the slate clean," Cooke spokesman Joel Richardson said.	https://bangordailynews.com/2019/10/16/news/down-east/canadian-salmon-firm-will-pay-156k-over-fish-pen-violations-to-fund-salmon-restocking/ https://www.seafoodsource.com/news/aquaculture/cooke-to-pay-fine-for-overstocking-maine-salmon-farms-not-conducting-environmental-testing

Approximate Date	Description	Source
October 31, 2019	Just weeks after Cooke Aquaculture agreed to pay the state more than \$150,000 to settle numerous violations at several of its salmon net pen sites in eastern Maine, the Department of Marine Resources is asking for public comment on the company's application for a 20-year lease renewal.	https://www.ellsworthamerican.com/maine-news/waterfront/dmr-seeks-comment-on-cooke-aquaculture-lease-renewal/
November 6, 2019	Last week, the Atlantic States Marine Fisheries Commission, the partnership, or "interstate compact," that sets harvest limits for 27 fisheries up and down the Atlantic Coast, officially accused Virginia of allowing Omega Protein to overfish,,,. In a December 2017 press release on the deal, Cooke hinted at a new use: "The animal feed ingredients produced by Omega Protein are an important component in Cooke Aquaculture's production of healthy Atlantic salmon, making this acquisition a strategic move that greatly enhances Cooke's vertical integration." So instead of rockfish, maybe the Bay's menhaden will be feeding farm-raised salmon in Canada.	https://fisherynation.com/archives/tag/cooke-aquaculture

In January 2019, Cooke applied to Washington Department of Fish and Wildlife to raise Steelhead. Cooke follows a consistent pattern of bad behavior of an unreliable tenant.

<https://salmonbusiness.com/cooke-aquaculture-to-settle-332k-fine-for-puget-sound-salmon-escape/>

Cooke Aquaculture to settle \$332K fine for Puget Sound salmon escape (30 April 2019)

Settlement agreement reached between the company and the Washington Department of Ecology for collapse of floating fish farm pen near in 2017.

On Tuesday morning, Cooke Aquaculture Pacific Vice President of Public Relations Joel Richardson wrote the following in a press release:

"Cooke Aquaculture Pacific was not interested in going through the hearing, putting additional stress on our employees, and reliving the regretful events of August 2017. When presented with the opportunity to dedicate 80% of the penalty (\$265,600 USD) to a supplemental environmental project, Cooke made

the decision to not litigate the penalty amount, and instead dedicate its resources to a project that will directly result in fisheries enhancement in the North Puget Sound region. Cooke is actively working on identifying such a project and partners in enhancing fisheries in North Puget Sound.

Conclusion

Decisions to modify water quality permits should include Cooke's record both past and present. The addition of more restrictions here is not a guarantee of future compliance. This industry and Cooke in particular should not be allowed to mine and pollute the public waters of Washington State for personal profit at the expense of Washington citizens. Please deny the modification to Cooke's current NPDES permit.

Tom Hansen