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THE SUQUAMISH TRIBE

PO Box 498 Suquamish, WA 98392-0498

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October 23, 2020

Laurie Niewolny
Aquaculture Specialist and Permit Coordinator
Washington State Department of Ecology
Laurie.niewolny@ecy.wa.gov

RE: Salmon Net Pen Water Quality Individual Permits for Cooke Aquaculture

Dear Ms. Niewolny:

In October, the Suquamish Tribe (Tribe) provided comments to Washington State Department of Ecology on Cooke Aquaculture Pacific's (Cooke) National Pollutant Discharge Elimination System (NPDES) permit applications to modify existing water quality permits for four Puget Sound net pens. Cooke requested modification is to raise all-female, triploid rainbow trout, also known as steelhead (*Oncorhynchus mykiss*), in its net pen facilities in Rich Passage and at Hope Island, instead of Atlantic salmon. Ecology has moved forward with modifying Cooke's permits to allow it to raise steelhead instead of Atlantic salmon despite the Tribe's opposition and objection based on the potential escapement and the genetic introgression of farmed steelhead with the distinct and independent native Puget Sound steelhead population.

The Tribe has been consistent in its opposition to all farming operations of native and non-native finfish within the Tribe's U&A. To reiterate, many problems that are associated with the farming of Atlantic salmon in net pens are also problematic with the farming of steelhead. Problems and impacts include:

- Marine net pens are open and any chemicals, medicines, food, or metabolic wastes that result from their operation are released directly to the waters of Puget Sound. Farming practices have longer term and greater impacts (from longer residence time and greater biomass to support) than a native delayed release or conservation-based captive brood recovery programs;
- Excessive densities from farming also results in changes in the benthic environment (more fines, changes in species assemblages);
- There is the potential for disease to be passed to native fish;
- Increase in the loading of exogenous nutrients to local waters (there are multiple low dissolved oxygen 303(d) listings in proximity to Cooke's Rich Passage facilities);

- Large aquaculture facilities and operations like those in Rich Passage attract nuisance species like seals and sea lions which may increase predation on local native populations of salmon and steelhead;
- Large aquaculture facilities attract native finfish species (including salmon and steelhead) subjecting them to numerous risks including predation, disease, and entrapment within net pens;
- Large aquaculture facilities, sited in the U&A of the Tribe, interfere with the Tribe's ability to exercise its treaty-reserved rights to fish in those locations.

Also of serious concern to the Tribe is that Cooke's proposal introduces the additional risk that fertile steelhead raised within Cooke's facilities could escape and interact with native, natural origin steelhead occurring in local streams. The Tribe's main concern with this proposal is the risk posed to the genetic integrity of our local demographically independent population of Puget Sound steelhead from genetic introgression of farmed steelhead. If there were a release of similar size to Cypress Island, the number of farmed steelhead in local waters would greatly outnumber steelhead of local and natural origin. The effect of genetic introgression of these farmed steelhead with the locally adapted natural origin steelhead could reduce fitness, survivability, and ultimately push natural origin stocks past the point of recovery.

Following review of the Ecology's draft permits and statements of basis modifying Cooke's NPDES permits to raise steelhead the Tribe recommends that Ecology require Cooke to have an updated Fish Escapement and Prevention Plan, Fish Escapement Reporting and Response Plan, and Pollution Control Plan as part of the draft permit for review. As it stands now, those plans will be updated and submitted within thirty (30) days of the final permit approval (S8, S9, and S10 in the draft permit). This does not give the Tribe and/or others the opportunity to review and comment on any proposed changes or updates in those plans. Given the Tribe's concern about escapement from Cooke's facilities, based on our actual experience with Cypress Island, it is critical that the Tribe has a chance to review and comment on these plans due to the potential risk of escapement and interaction with natural origin steelhead.

Sincerely,



Leonard Forsman
Chairman