

Spike Mafford

The inadequacies of Washington State's Department of Ecology's modifications to the existing NPDES permits for Cooke's former salmon farms, enabling Cooke to switch to Triploid Steelhead/Trout, are overwhelming. We strongly urge the Department of Ecology to deny any new permits.

Here are a few things to consider:

Cooke Aquaculture Pacific is not a responsible citizen, they have continually broken Washington State's trust through their negligent actions, lack of maintenance, and escapes. They are a bad actor and should not be rewarded with more opportunity to profit again off Public Waters.

Transfer of Viruses and Diseases from concentrated feedlot farmed animals to local waters, and native fish populations.

Farmed Fish need to be physically marked, so that they can be identified from Wild Steelhead populations if they escape.

-to be marked so as to distinguish an aquaculture-raised steelhead from conventional hatchery-raised steelhead and from wild, natural-origin, steelhead. It is critical that aquaculture-raised steelhead be provided with an externally visible mark that is distinct from the adipose clip used to identify conventional hatchery-reared steelhead.

Ecology needs to focus on the net-pen waste and feces stream, and its attractant implications as an unnatural pesticide, pharmaceutical, and antibiotic-laden food source for at-risk and struggling Puget Sound herring and forage fish populations, immature salmonids, and Native Steelhead smolts.

I am also concerned with the potential for attracted forage fish, immature salmonids, and Native Steelhead smolts, to become trapped residents in the pens, and a "take" from the Public Commons as an added "free" food source for the Cooke fish farms.

This has been well-documented through the use of underwater cameras in British Columbia aquaculture operations.

The other concern is the transfer of sea lice parasites from the swarms that develop and expand at the farms, to wild and resident fish populations. Low-count lice loading has been proven to be detrimental and fatal to immature salmonids, forage fish, and Native Steelhead smolts.

Floating Feed Lots are endangering the health of Washington's waters which support our culture, economy, wild salmon, and Orca whales.

Save the Sound, the whales and the wild salmon from this predatory practice.