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Summary: It is premature to issue discharge permits to Cooke Aquaculture's proposed open net pens growing mostly sterile rainbow trout in Puget Sound until EPA and NOAA have completed their Biological Opinion, started only due to a court decision. Issuing those permits only puts Washington State at risk of litigation, a long and expensive process. Alternatives exist which protect Puget Sound's marine ecosystem. Cooke Aquaculture has the land and the technology exists.

Thank you for the opportunity to comment on the proposed discharge permits which would allow Cooke Aquaculture to grow mostly sterile rainbow trout in Puget Sound and create plumes of untreated waste discharged into Puget Sound's public waters.

As background, I was born, raised and educated in Washington State. My family has owned property on the shoreline of Puget Sound for four generations now. I have seen development along the shoreline, in the tidelands and in the waters evolve over those many years to levels not considered in the past.

There is no question that aquaculture has been largely ignored until recently, most believing it is benign with little to no adverse impacts. The recent court case which negated the Corps of Engineers Nationwide Permit 48 clearly demonstrates cumulative impacts have not been considered adequately, whether in the form of shellfish aquaculture or in this case net pen aquaculture. The more recent court decision which forced NOAA and the EPA to begin a Biological Opinion should shine a bright enough light on this process to show the Department of Ecology it is premature to consider, let alone issue any discharge permits to Cooke Aquaculture, no matter the species grown.

The press release from Wild Fish Conservancy summarizes adequately that decision and process, found here: https://wildfishconservancy.org/pressrelease10.11.2018/at_download/file

Thank you for the opportunity to comment and to help protect Puget Sound.