

Shari Tarantino

My name Shari Tarantino. I am the executive director for the Seattle based nonprofit, Orca Conservancy, and we work on recovering and advocating for the critically endangered population of southern resident, killer whales.

We focus on law and science and part of what we believe is, and I think Ecology can also relate to this, is that Congress passed a clean water act to restore and maintain the chemical, physical and biological integrity of our nation's waters. You can go to 33 U.S.C. 1251(a), and you can also locate number D 1. 511 U.S. 707.14, which is the National Mgal, being to achieve water quality, which provides for the protection and propagation of fish, shellfish and wildlife, and provides for recreation in and on the water.

Congress responding to the nation's need for clean water supplies tasks the Clean Water Act to creating means by which to reduce the amount of water pollution nationwide. In order to correct the water pollution program the Clean Water Act defines the term "discharge of pollutants" to mean, any addition of any pollutant to navigable waters from any point source.

The Clean Water Act defines a point source as any discernible, confined and discrete conveyance, including, but not limited to any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rally, stock, concentrated animal feeding operation or vessel, or other floating craft from which pollutants are, or may be discharged.

Nonpoint sources are defined as those sources not traceable to a single conveyance. Additionally, the Clean Water Act defines "pollutant" as a direct spoil, solid waste, incinerator, residue, sewage garbage, sewage sludge, munitions chemical waste, biological materials, radioactive materials, heat, racked or discarded equipment, rocks and cellar dirt, industrial municipal and agricultural waste discharged into the water.

This Clean Water Act extends to both animate and inanimate pollutants. The statute, for example, regulates fecal coliform, living bacteria as conventional pollutants in the Washington Pollution Control Board has also found that escaped salmon are agricultural or industrial waste.

Another statutory example of the definition of a pollutant.

As a federal government also considers aquaculture to be a form of agriculture, escaped salmon may similarly be treated as agricultural industrial waste under the Clean Water Act. Our goal, obviously, is to work towards advocating for the critically endangered population of southern resident killer whales.

Open net farms, regardless of the species, can discharge significant amounts of waste water, containing nutrients, chemicals and pharmaceuticals that impact the surrounding environment. I mean, I can go on and on. Furthermore, feed and fecal matter from these facilities can deplete the dissolved oxygen concentrations around and certainly within the facilities. Even the anti-following agents, copper, which I need to research, to keep these cages and pens clean are highly toxic.

Therefore, Orca Conservancy and its 45,000+ members and supporters stand in direct opposition of said permits from Cooke Aquaculture. This company is not a good respectable neighbor. They have proven time and time again that they are unable to be respectful to our waterways.

We have welcomed them into our waters and they have done nothing but disrupt and decimate what our waters are trying to protect.

Please rescind this permit if at all possible and protect our waterways, our salmon, and our critically endangered population of southern resident killer whales. Thank you.