

Hugh Mitchell

Comments attached in a pdf.

To whom it may concern,

RE: Cooke Aquaculture Pacific NPDES permits modifications to raise steelhead

The question is simple. It has nothing to do with whether aquaculture should be done in Puget Sound. The current leases are valid for another couple of years. Leading up to the end of that time period, that discussion can take place. The only question here: Is Atlantic salmon waste and risk significantly different from sterile Rainbow trout for the Department to not allow Cooke to continue to culture fish under the current NPDES permits. All information says no, there is no difference. This shouldn't really take this kind of process and the Department should really be able to make this decision on their own. It is simple for the Department of Ecology to decide this allow the permit modification.

The exhaustive Environmental Impact Statement on Net pens by the Department of Fisheries has been criticized for being from 1990 and not being relevant to today's changed Puget Sound. However, nitrification is still nitrification today. The contribution of the key nutrient, nitrogen, by net pens has been shown to be insignificant compared to all other sources. The EIS summarized that the impact of 100 farms producing 34,100 MT/yr of salmonids would "be minimal and largely negligible". Even with any changes in Puget Sound, the 4 Cooke sites are just a fraction of this and are still negligible to today's total input. The EIS still provides relevant information to gauge the impact.

The EIS's statement on disease transmission risk is still relevant: "The risk of transmission of disease from farms to wild fish is not likely a significant problem. Disease observed in fish farm culture of salmonids in Washington results from the holding of the fish in captivity. Such diseases are non-exotic; infectious agents that cause such diseases originate from environmental sources or wild fish."

These pens have been in Puget Sound for nearly 40 years. They have been through multiple owners from US to International; from private to corporate. Facts and science (not politics and vested interests) show that fish farming is one of the most environmentally benign industries out there. The know-how and dedication of the skilled workers required to produce wholesome seafood should not be taken for granted. Many have been working on the net pens for most of that entire period. The value of their acumen should not be taken for granted. It can be translated from Atlantic salmon to Steelhead culture and for the sake of our oceans and Sound should not be lost. Despite what detractors say, we should be proud of the pioneering aspect of WA State net pen culture.

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