



Cooke Aquaculture Pacific

PO Box 669 Anacortes, WA 98221

Phone: (360) 293-9448

Fax: (360) 293-0558

Ms. Laurie Niewolny
WA Department of Ecology
Southwest Regional Office
PO Box 47775
Olympia, WA 98504-7775

January 29, 2020

RECEIVED

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WA State Department
of Ecology (SWRO)

**Re: Additional application materials for inclusion with Cooke Aquaculture Pacific
NPDES permit modifications (Permit numbers WA0031534, WA031593, WA0031526,
WA0031542)**

Ms. Niewolny:

Please find copies of the updated (dated January 27, 2020), Cooke Aquaculture Pacific-Operations and Maintenance Manual; Pollution Prevention Plan; Fish Escape Prevention Plan; and the Fish Escape Reporting and Response Plan for the Fort Ward, Orchard Rocks, Clam Bay and Hope Island net pen facilities. Cooke is submitting these updated plans for inclusion with our NPDES permit modification application materials sent to Ecology on October 16, 2019. As you are aware, Cooke is requesting an NPDES permit modification for transitioning the marine net pen operations from raising non-native Atlantic salmon to raising native fish species. Cooke received approval on January 21, 2020 for a Marine Finfish Aquaculture Permit to raise all-female triploid Rainbow trout, *Oncorhynchus mykiss* from the Washington Department of Fish and Wildlife (WDFW) at the above listed net pens. A copy of the WDFW Marine Finfish Aquaculture Permit approval letter, and the accompanying attachments are attached to this letter and are also being submitted to Ecology as additional application materials for the requested permit modification to raise all-female triploid Rainbow trout.

In 2019, Ecology issued a new National Pollution Discharge Elimination System (NPDES) general permit for the operation of the net pen facilities. The new permits are for the continued marine net pen farming of Atlantic salmon. The updated Cooke Fish Escape Prevention Plan, together with the Pollution Prevention Plan, Operations and Maintenance Manual, and Fish Escape Response and Reporting Plan (the Plans), were developed to satisfy the requirements of the 2019 NPDES individual facility permits for the Fort Ward, Orchard Rocks, Clam Bay, and Hope Island net pen facilities. The plans cover a wide variety of measures that are used to prevent pollution, comply with monitoring and reporting procedures and for the prevention of fish escapement. Cooke sent copies of the updated plans to Ecology, WDFW and the Department of Natural Resources on January 27, 2020 for permit compliance and is implementing these updated plans at their net pen facilities. We believe that the bulk of the operational procedures, BMP's and other provisions spelled out in the plans are also

applicable for the rearing of other native fish species in the net pens such as the Rainbow trout. We realize new or different conditions may develop with the modification of the NPDES permits to allow the culturing of native fish. These plans and the associated operational procedures would be updated at that time in order to comply with any changes to the modified permits.

Included in the October 16, 2019 application package previously submitted to Ecology for the four above referenced net-pen facilities were the following documents:

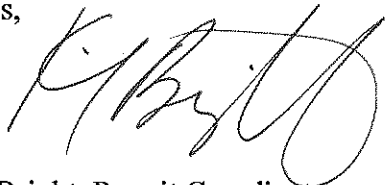
- Department of Ecology Marine/Freshwater Salmonid Net-Pen NPDES application- (One copy for each facility).
- EPA Form 1 and EPA Form 2B- (One copy for each facility).
- Finfish Aquaculture Plan of Operations, All-Female Triploid Rainbow Trout (*Oncorhynchus mykiss*). Cooke Aquaculture Pacific, LLC. (One printed copy).
- Fish Escape Prevention, Response & Reporting Plan. Cooke Aquaculture Pacific, LLC. (One printed copy).
- Regulated Finfish Pathogen Reporting Plan, Cooke Aquaculture Pacific, LLC. (One printed copy).
- SEPA Checklist and SEPA Attachments A through E (Prepared July 23, 2019). WDFW Marine Aquaculture Permit Application Raising All-female, triploid *Oncorhynchus mykiss*- (One printed copy).
- Attachment F: WDFW SEPA-MDNS 19-056: Dated October 1, 2019. Raising Sterile All-Female Triploid Rainbow Trout/Steelhead at Existing Marine Net Pen Sites in Puget Sound- (One printed copy).

Included with this January 29, 2020 letter are the additional application materials for the NPDES permit modification listed below:

- Cooke Operations and Maintenance Manual. Dated January 27, 2019
- Cooke Pollution Prevention Plan. Dated January 27, 2020
- Cooke Fish Escape Prevention Plan. Dated January 27, 2020
- Cooke Fish Escape Reporting and Response Plan. Dated January 27, 2020
- Washington Department of Fish and Wildlife (WDFW) Approval of Cooke Aquaculture Pacific application for a Marine Finfish Aquaculture Permit to Raise All-female Triploid Trout (Steelhead; *Oncorhynchus mykiss*) and Attachments 1 and 2. Dated January 21, 2020

If there is any further information you may need please feel free to contact me.

Regards,



Kevin Bright, Permit Coordinator
Cooke Aquaculture Pacific, LLC

Cc: Jim Parsons, General Manager-Cooke; Doug Steding, NW Resources Law