

**STATE OF MAINE
BUREAU OF ENVIRONMENTAL PROTECTION**

**NORDIC AQUAFARMS, INC.
Applications Pursuant to Air Emissions,
MEPDES, SLODA and NRPA
I-28319-26-A-N/L-28319-TG-B-N
L-28319-4E-C-N/L-28319-L6-D-N
Proposed Salmon Aquaculture Facility
Belfast, Maine**

PETITION TO INTERVENE OF GULF OF MAINE RESEARCH INSTITUTE

The Gulf of Maine Research Institute (“GMRI”), by and through its undersigned representative, hereby files this request to intervene in the above captioned proceeding. On May 17, 2019, Nordic Aquafarms, Inc. (“NAF”) filed an Application with the Maine Department of Environmental Protection (“Department”) pursuant to Maine’s Air Emissions, Maine Pollutant Discharge Elimination System (“MEPDES”), Site Location of Development Act (“SLODA”), and Natural Resource Protection Act (“NRPA”) to construct a salmon aquaculture facility in Belfast, Maine. On June 20, 2019, the Bureau of Environmental Protection (“BEP”) assumed jurisdiction over the project.

In accordance with the Maine Administrative Procedure Act, as amended, any person demonstrating that he or she is or may be “substantially and directly affected” by an agency proceeding may “intervene as a party to the proceeding.” 5 M.R.S. § 9054. On June 27, 2019, the Department issued a Notice of Opportunity to Intervene. For the reasons described more fully below, GMRI is substantially and directly affected by NAF’s Application due to GMRI’s fundamental commitment to supporting the stewardship of the Gulf of Maine and supporting families and communities as they adapt to a changing climate and look for new economic opportunities to provide fish protein to local, regional, and global markets. GMRI, therefore, requests that the BEP grant this petition for leave to intervene as a party in BEP proceedings regarding the NAF Application.

GMRI is an independent, non-profit corporation organized under the laws of the State of Maine, with its principle place of business 350 Commercial Street, Portland, Maine. Our mission is to pioneer collaborative solutions to global ocean challenges. We’re focused on the waters and fisheries, wild and farmed, of the Gulf of Maine and Bay of Fundy. We take an interdisciplinary, human/natural ecosystem approach to understand and address challenges and opportunities related to marine stewardship and coastal community economic development. One of our core goals is to cultivate scientific literacy and provide independent, objective scientific information about the Gulf of Maine and its resources to Maine citizens and governmental decision-makers.

Six years ago, we looked closely at the challenge of how Maine might diversify away from its risky dependence on lobstering as the economic mainstay of our fishing communities. We concluded that responsible aquaculture is the logical complement to our traditional fishing economy. Thus we've developed the resources to support the growth of responsible algae, shellfish, and finfish production.

Given our interest in aquaculture as a 21st century seafood opportunity and the carrying capacity of coastal waters, we've been following and, where appropriate, supporting strategies of responsible diversification from owner/operator lobstering into owner/operator algae and shellfish farming, modest expansion in sea pen salmon-farming Downeast, and breakthrough attraction and development of on-land finfish RAS (Recirculating Aquaculture System) production.

We possess an unusual mix of oceanographic, ecologic, seafood supply chain, aquaculture industry, business management, and operations knowledge and insight. We believe we can be a useful source of independent expertise and informed policy perspectives on the questions that will be central to the development of responsible RAS aquaculture in Maine and will be considered in the MPDES and, possibly, NRPA permit reviews. We do not expect to have any expertise to contribute to the Air Emissions or SLODA permit reviews.

GMRI therefore respectfully requests Intervenor status in the above captioned proceedings.

A handwritten signature in blue ink, appearing to read 'DWP', is centered on the page.

Date: July 12, 2019

Donald W. Perkins, Jr., President/CEO