

Bureau of Environmental Protection,
C/O Cynthia S. Bertocci, Executive Analyst
17 State House Station
Augusta, Maine 04333-0017

February 17, 2020

Re: Hearings in Belfast last week regarding Nordic Aquafarms, Inc.

Dear Chairman Duschene and Members of the BEP, Members of the DEP and Staff:

My name is Martha Block. I am a resident of Northport. I live on the other side of the Little River reservoir where Nordic wants to build.

I attended your hearings last week carefully listening and trying to understand all the testimony given. I want to commend you for doing the same. You gave constant attention to each expert witness and to the public as their heartfelt thoughts were presented. Because this issue is so important to me, I give you my overwhelming thanks.

This past weekend I tried to identify the most important aspects of the project for me, and from that effort, I write to encourage you to seek more information about the NAF project before granting any permits.

I will start with noise. Living as close as I do to the site, noise is of particular interest to me. I have an emergency generator because this area is known for frequent short-term (and sometimes long-term) losses of power. In the last couple of years there was at least one 4-5 day outage. Knowing that the sound of my one generator testing itself for 15" weekly is apparent to me even in winter with the windows closed, I cannot help but be distressed by the idea of 7 generators running for several hours, perhaps daily, exposing us to their constant hum. What will be the true measure of the decibel's or possible hearing or mental health effects of such a persistent background noise. The sound of all the proposed exhaust fans is another issue. Where are they located and how many are there? Have these noise aspects been evaluated sufficiently? Are there other noises of which I am not aware?

Attending the Belfast Planning Board hearings, I learned that NAF's study on traffic impact was projected by Nordic to be just below the level that would have triggered a DOT study. This is one example of what I learned at your hearings. Many of NAF'S in house studies re: permitting issues come in just below the threshold. Energy consumption, air emissions were other examples. It is more than a possibility that Nordic will exceed many of the limits for small industries and the BEP and DEP are not holding them to the more appropriate standards of major industrial facilities. Is that not obvious to you? It seems that there are many aspects of the project that would benefit from further study.

Let me name a few more:

1. Damage to Bay from the volume of wastewater discharge, warming temperature of the effluent, exposure of mercury from disruption of the seabed. Filtration of discharge even if 99% , given the volume, still leaves 1% and that's a lot. In fact, nitrogen removal is by Nordic's estimates only 85% .
2. Excessive fresh water consumption, possible salination of wells and use of surface water from the Little River reservoir are not well thought out.
3. Destruction of a healthy ecosystem, a habitat classified as a significant under Maine's Natural Resources Protection Act. Nordic's "scientific" studies were severely deficient. You don't have to be a scientist to see it's a mature forest with fields and important wetlands. I can personally attest to it's wildlife which I see everyday. Wildlife is moving all around as seen by footprints in the snow and occasional appearances. Three weeks ago I followed a beautiful little mink move about our yard from the riverbank area to the side of my house and then back to the river. I was mesmerized. Of course, the fishermen are out there too, now that the ice is frozen. Come spring the beavers arrive to prune my cattails and keep them from becoming invasive. Then the ducks begin to arrive migrating north, and robins, cardinals and the little songbirds come to nest. Summer seems to bring the eagles, blue heron and many more ducks who travel the river path to the sea until fall when they are usually the last to fly off, seemingly able to tell the very night the pond is going to freeze over. When we moved here our house was home to a lot of bats. I think our space became too busy for them so perhaps they have gone across the river to the Water District side where I think the mink family also lives. I fear the loss of this watershed area with all its inhabitants and hope you will give serious thought to saving it.
4. My last great concern is twofold. Nordic has continually spoken of it's use of "best practice management". I've recently realized what their claim really means. It means "best practice for a flow thru RAS, not a true RAS. What Nordic means is the best system which uses excessive amounts of fresh water and discharges excessive amounts of effluent each day while recirculating only a fraction of the water, fresh or sea.

This differs from what is really the BEST TECHNOLOGY AVAILABLE. The BTA would be a CRAS, a closed recirculating system. This is a system that does not pollute. CRAS facilities have been tested, are up and running and are looking to expand. It is truly land based without the massive needs for water.

Along these lines, Nordic in it's BDN ad last weekend also made the statement that it would be setting new standards for protecting the environment with its Best Practice Management aquafarm. Wow! This is one of my greatest concerns! Are we really letting Nordic set the new standards?

Maine needs to set it's own standards for the regulation of the many aquafarms on the horizon. As in the 70's when Maine set a high bar for water and air protection it must step up and do the same as it welcomes this expanding growth. Aquafarms are already here and more will come but they need to be sited where they do less

damage to an existing healthy ecosystem and they need to really use the BEST Available Technology, technology that does not deplete our fresh water or add warmth and pollutants to our Bay and an industry that will help us reach our Governor's goals for carbon neutrality rather than make it harder to reach them.

It is truly a watershed moment for Maine and a great opportunity for the State to become a leader in this up and coming field.

Sincerely,

Martha M. Block