

TO:

The Department of Environmental Protection  
The Board of Environmental Protection  
Belfast City Planning Board  
Att: Cynthia S. Bertocci  
Executive Analyst, Board of Environmental Protection  
17 State House Station, Augusta, Maine 04333-0017

FROM:

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I am a resident of Belfast concerned about the proposed Nordic Aquafarms salmon factory on the Little River. I have a number of concerns including the impact on climate, carbon footprint,

It is my understanding that Maine's Climate Action Plan states that Maine cannot reach its carbon reduction goals with business-as-usual. Nordic Aquafarms is a business-as-usual factory farm. Here are a few examples of all it will require:

- the dumping of 7.7 million gallons of nitrogen rich effluent that will also contain unknown quantities of chemicals and drugs including antibiotics, pesticides and cleaning agents, as well as pathogens that will pass through the filtration system, every day into the Penobscot Bay where children swim, lobstermen fish, and the endangered Atlantic salmon and Shortnose sturgeon struggle to survive.

- the liquidation of a maturing, carbon sequestering forest, and wildlife habitat of Special significance, carbon storing soils and wetlands of Special Significance, streams and drainages, critical shoreland wetlands,

- a massive infrastructure with a huge carbon footprint (it will equal the size of Gillette Stadium, Fenway Park, and two TD Gardens),

- eight diesel generators each with a 67 foot smokestack, and a cement plant

- alterations to Route 1 and at least 5 years of construction and

- unknown amounts of noise and odor,

- 1,250 gallons of fresh water a minute,

- the use of so much electricity that the existing grid cannot sustain the demand which equals that of Belfast, Northport, Lincolnville, Camden, Rockport and Rockland combined.

I understand Belfast, like all towns, needs to receive revenue. However, the climate and extinction crisis demand that we move beyond the business-as-usual model proposed, and adopt innovative, creative technologies and systems that drastically lower greenhouse gas emissions, and protect the natural world. Protecting the Penobscot Bay from pollution and warming is critical.

Nordic's approach is an outdated model based on receiving a "license to pollute." Belfast, the State of Maine, and the world can no longer afford this approach.

It is my understanding that far better aquaculture systems exist that require significantly less energy, recycle all of their waste, and do not entail the antibiotics, pesticides and caustic cleaners Nordic requires.

Maine should choose to support corporations using fully closed systems placed in quarries on brownfield sites. This will bring good and lasting jobs and revenue to Maine. It will guarantee that local lobstering and fishing businesses, as well as small-scale aquaculture ventures, and recovering wild fish populations, are protected from pollution.

Fully closed systems are the future, and they represent a win-win-win for Maine.

I am also concerned that Nordic has not shown that they have the financial capacity to build and maintain a \$500 million project. What about financial risk from business failure?

Asked what would happen if the proposed factory failed, Nordic's Erik Heim responded "The worst thing is that valuable infrastructure will be established here [which] will be attractive to investors." Experience shows that something worse can happen.

VeroBlue Farms, which had planned to become North America's largest land-based fish venture, has filed for bankruptcy. The Iowa Messenger reports that in 2014, Webster City, Iowa, welcomed VeroBlue and its promise of 150 jobs, but now is owed \$135,997.96 for unpaid sewer and utility charges plus \$279,000 in unpaid property taxes.

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According to Geir Myre, head of aquaculture insurance at XL Catlin, recirculating aquaculture system salmon farms can be financially risky and “some insurers don’t want to insure those kind of farms,” in part because of risk that the fish inventory can be completely wiped out in RAS systems (linked to release of hydrogen sulphide). (SalmonBusiness 9/11/18)

Nordic says it will avoid financial collapse by being bigger than any current land-based factory. GM was bigger than the other car companies, and the taxpayers of the United States had to bail it out.

The city of Belfast has already agreed to pay Nordic \$240,000 in startup costs (BDN 2/7/18). What protection do taxpayers have if the unexpected happens: the factory fails and owes Belfast money? Is Nordic establishing an escrow fund with periodic deposits designated for service charges or property taxes?

Thank you for considering my concerns.

Sincerely,

Kathryn Shagas