

RE: Public Comment regarding Nordic Aquafarms Permit

To: the Board of Environmental Protection  
and Maine Department of Environmental Protection  
Feb 18, 2020

Members of the Board of Environmental Protection,

I am writing to urge you not to grant permits to the Nordic Aquafarm for its proposed land-based fish farm along the Little River in Belfast.

I've lived in Belfast for 20 years, the last 10 by the Little River, near the proposed site. As you might imagine, I treasure this special area.

I have a number of concerns, but foremost among them is that it would be a travesty to construct this huge project on this particular location. This would be a terrible misuse of a pristine natural area. It's not just the river itself that matters (or the much-loved trail bordering it); the adjoining woodland, the whole watershed, is important habitat for the birds, mammals, amphibians and smaller creatures that live there and rely on the water. This is a rare wildlife corridor in Belfast connecting, inland woods to the bay.

It is completely inappropriate to convert these 50-plus acres of mature woodland, set within a rural context, into an industrial site with a build-out of at least 35 acres, including the excavation of several feet of active soil (to be replaced with other soil!) It would be much better to use a brownfield area, if a project of this nature, size and scope were to proceed.

Moreover, the lifespan of this industry is purportedly only 30 years. That's not very long. What becomes of this site in the case of premature failure, abandonment, or even after its eventual expiration? There is no repurposing this facility, this industrial site. Even with a decommissioning bond – which we should require – once constructed, no money or “restoration” can recover what we'd lose. We would have obliterated this hugely valuable environmental area, and it would be gone forever. It can't possibly be worth it.

How much better to be investing in the improved health of our bay and the restoration of marine fisheries. I keep reading and about the resurgence of fisheries in the rivers and bay after dam removals over the last few years, that the alewives and salmon are rebounding. (Small forage fish feeding bigger fish, etc.) If Nordic builds this project, we will lose that chance.

Though Nordic is taking precautions, the potential to alter existing marine habitat *is* there, and I worry a lot about that. I have concerns that the location for the outlet pipe is not deep enough and that there isn't enough current to circulate and diffuse the outflow. I have concerns that particulars, such as nitrogen, salinity and temperature of the outflow differ with existing conditions, and that the measurements will exceed the averages Nordic has

cited. Would a higher amount still be safe? Additionally, Nordic has provided insufficient sampling of representative temperatures and currents, and during time frames that are not representative of year-round use.

If the Board were to proceed exploring the proposed project, please request thorough environmental impact studies for both the land and the bay.

Aquaculture is still a new industry, and I have grave concerns that the regulations required to truly protect our marine waters is insufficient. For all future aquaculture projects, I urge the Board to take *great caution*, to develop the necessary precautions and regulations now, before these kinds of businesses get established, to ensure the protection of our fisheries, our tourism, our livelihoods, and the continued or improved health of all marine life.

I have other concerns, including, but not limited to: disruptive noise and traffic during excavation and construction and operation; and the incongruity and aesthetic degradation of a huge industry within view from the river hiking trails or from Perkins Rd (a popular scenic cycling and walking route among residents).

Thank you for your thoughtful consideration, time, and efforts in reviewing this matter.

Sincerely,

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