Board of Environmental Protection State of Maine

February 6, 2020

We write as interested persons to the Nordic AquaFarms permit application to express our concerns and observations. Many people have remarked on the contrast between the response to the salmon farm proposal from Whole Oceans and that from Nordic AquaFarms, implying that Belfast residents are more contentious than Bucksport residents. We contend, however, that the difference in response lies not in the residents, but in the contrasting sites.

Whole Oceans selected a brownfield site—an abandoned mill site on the banks of the Penobscot with some of the required pipes already in place that the community had been marketing, hoping to attract a new industrial company.

Nordic AquaFarms, by contrast, was sold a pristine natural area that was zoned residential and had been identified for preservation in the Belfast Comprehensive Plan. Additionally, it was separated from the ocean by a busy federal highway and established oceanfront residences. Any one of these impediments should have eliminated this site from serious consideration. To proceed notwithstanding these obstacles was to ensure opposition.

Nevertheless, city officials and the City Council secretly negotiated the sale of this quasipublic land, motivated no doubt by totally unrealistic projections of property tax relief. Subsequent developments have underscored the inappropriateness of this site. Original plans to use a tunnel boring machine to drill under the highway and residences out into the bay for the intake and discharge pipes had to be abandoned because they were not feasible and/or were prohibitively expensive. Alternative plans to dig deep 40 foot wide trenches are also problematic. There is no satisfactory way to close Route 1 to permit trenching and laying pipes. And very significantly, the trench across the Eckrote property apparently will require blasting of the granite bedrock—the very granite shelf upon which at least one neighboring house is built.

The revelation that the intertidal zone is privately owned and has been placed in a nature conservancy should have scuttled this plan. But instead, Nordic has sought to legally challenge this ownership, apparently claiming that deeds don't mean what they say. Regardless of the court ruling, this lawsuit has substantially increased the acrimony surrounding this project.

Extensive on-site soil and water testing by Ransom Consultants initially found that the aquafer is sufficient to supply Nordic's needs. Now we learn that the aquafer can provide only about one third of their fresh water requirements and they will have to rely on the city's public water supply for much of their operational requirements.

Not only that, but the uncontaminated soil of the Belfast Water District, so prized by Nordic, is not capable of supporting the tremendous weight of the filled tanks and must be removed and trucked out while thousands of tons of replacement soil must be trucked in.

<u>Most recently</u> we have learned that Nordic will be burning up to 900,000 gallons of diesel fuel annually, necessitating the erection of eight 65 foot smoke stacks, adding air and visual pollution to the lengthening list of environmental concerns associated with this project.

With all these unexpected adverse complications arising during the planning process, we worry what potentially disastrous developments might arise during the actual construction and eventual operation of this project.

Erik Heim has estimated the life span of this project to be 30-35 years. But the destruction of this valuable wildlife habitat and precious natural area of woods, fields, and wetlands will be permanent.

Sincerely,

Larry Theye and Betty Becker-Theye