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From: Wendy Watson <wswatson8@gmail.com>
Sent: Tuesday, February 18, 2020 4:05 PM
To: DEP, Nordic Aqua Farms
Subject: Nordic Aquafarm Salmon Farm Concerns

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Dear BEP,

I am writing to you to inform you of my serious concerns and objections to the Nordic Aquafarm Salmon Farm project in Belfast, of which I am a resident. I have listed my main concerns below. Thank you in advance for taking these concerns into your deliberations and decision on the merit of this mega fish farm project.

Size of the Project and Limited Experience

- **The Nordic Aquafarms (NAF) Salmon Farm project would be the world's largest land based salmon farm in the world, 33 million tons of fish produced at full production. It would be 16 times larger than this company's initial project in Norway** (still not at full production capacity). No company, including NAF, has ever done something on this scale before in the world. **We are basing the decision to move forward with the NAF project based on their theoretical modeling, not on actual experience.**
- **NAF only incorporated in 2014 and has been actively in business just two years**, with only one plant in production, the first harvest in Dec. 2017 being yellowtail kingfish and not salmon. **Do we want to be the town that they experiment on?**

Location of the Project

- **The siting of a large, industrial factory fish farm along the BWD Little River Reservoir and hiking trail will destroy a pristine, wooded area that is habitat to a lot of wildlife and enjoyed by many hikers.** The City seems to be willing to sacrifice the area to be clear cut, built and paved (minus 250' along the reservoir for the existing trail) vs. considering the siting of this project in the business park or the potential reuse of another industrial area.
- **Increased traffic congestion along Rt. 1 with tractor trailer trucks coming and going on a daily basis, combined with a 7 year of construction period** for a project this size, will be significant.

Environmental Impact

- One significant concern is that there is **no fish meal currently being produced at the volume that will be needed, which is considered organic. Testing of current sources of fish meal have been found to be dangerously high in concentrations of dioxins, PCB's, heavy metals and other toxins such as Ethoxyquin** (a chemical pesticide used to prevent rancidity of the fish meal, and a possible carcinogen).
- 100% of the waste produced in a land based RAS Salmon system can neither be contained nor eliminated. We also don't have adequate information about the discharge volume and what will be in the discharge after filtering. NAF only promises that it will be "clean."
- We have not been given adequate information from NAF about the actual amount of water they will need for a project this size. Based on the 2017 International Salmon Farmers Association (ISFA) report, it has been estimated that a facility this size would require **60 BILLION gallons of water annually** from our local aquifer and Bay.
- We should be asking for a guarantee from NAF to not use any water outside of it's 40 acre site, to protect neighbor's wells and the local aquifer. We should also be asking that NAF conduct an environmental impact study, given a project of this size.

Energy Use and Fish Health

- **Energy consumption for land based aquaculture is very intense. Consider that for every pound of fish produced there is an impact of 263 pounds of carbon emissions.** According to the ISFA report, that due to such high energy and infrastructure cost, in order to make land based salmon fish farms profitable, fish must be raised in much higher densities than in net pen marine systems, which creates stress on the system and the fish in it.
- Even in land based aquaculture systems challenges still remain like pathogens getting into the system and once there, the whole system has to be depopulated of fish and then disinfected, and tanks refilled and repopulated with fish again. In addition, fish escapes can and do happen due to human error and handling.
- **A recent report by the Scottish Salmon Producers Organization (SSPO) concluded that land based RAS for fish farming for all grow out stages, is neither financially viable given the high energy use and the resulting high carbon footprint that makes for an environmentally unfriendly choice.**

Tax Revenue and Job Growth

- Do we actually have detailed figures to prove the NAF promise of cutting our mil rate in half? If so, then that information should be public knowledge.
- **Historically our property taxes have not declined in the two decades since I've lived here in Belfast even with such large employers and businesses that have come to Belfast, like MBNA, athenahealth, Front St. Shipyard, etc.**
- Large-scale growth can increase tax revenues, but mil rates do not stay reduced as budgets must increase, as the state now wants to reduce subsidies that are property evaluation based.
- Of the 60 jobs being promised, do we know how many would actually benefit local citizens or will they most be highly technical and skilled jobs for the well-educated? **Many local employers have said they are experiencing a lack of qualified candidates to fill current job openings, along with an affordable housing crisis that both Wayne Marshall and the City has acknowledged and is trying to grapple with currently.**

Wendy Watson
Belfast, ME