Burke, Ruth A

From:	Deanna Madvin <dmwolfire@madwolf.com></dmwolfire@madwolf.com>
Sent:	Monday, February 17, 2020 1:37 PM
То:	DEP, Nordic Aqua Farms
Subject:	Nordic Aquafarms Concerns

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To: The Maine Department of Environmental Protection:

Our names are Deanna Wolfire and Doug Wolfire, and we are summer residents of Northport, Maine. Our property is near the shore, just south of the proposed Nordic Aquafarms salmon factory. I am contacting you concerning the proposed Nordic Aquafarms salmon factory, particularly its size, amounts of fresh water and where the water will be drawn from, filtration system, and potential pollution, and closure plan.

The proposed factory is massive. It equals the size of Gillette Stadium, Fenway Park, and two TD Gardens. It requires 8 diesel generators, each with a 67 foot smoke stake, and an on site cement plant, and waste disposal facility. It's estimated that Nordic will draw down 657 million gallons of fresh water a year. This water will be drawn from wells, from the Belfast water supply, and the Little River. This draw down will likely impact the residents and commercial areas of Belfast and nearby towns. For example, Testing of the local aquifer resulted in salt water intrusion in one test well and a draw down of 15 feet in other wells.

According to independent consultants retained by Upstream GEI: Nordic, and their engineers conducted on-site evaluation of potential groundwater supplies. Tests conclude that up to 455 GPM of groundwater is proposed to be extracted from bedrock. Additionally, the aquifer testing demonstrates that the pumping of these wells will cause salt water intrusion from Belfast Bay. In ME DEP Chapter 375; "No Adverse Environmental Effect Standards of the Site Location Development Act", sections 7 and 8 specifically prohibit any adverse effects to groundwater quality. Salt water intrusion is one of the adverse effects considered by the Act. The Nordic application for development does not address the consequences of the anticipated salt water intrusion.

Please note that the water that comes from the Belfast Water Supply originates from wells near the Goose River. There is potential for connection between the Goose River and the wells. No environmental impact study concerning a potential river drawdown has been conducted. Nordic, as proposed, will not be a fully closed system. The fresh water that is taken in will be discharged, along with 7.7 million gallons of effluent into shallow waters west of Islesboro every day directly into lobstering grounds, and endangered salmon and shortnose sturgeon habitat. Modeling studies performed by Nordic suggested in 2018 that additional data be collected in order to more accurately predict where the effluent will go in the bay. Even using less exact modeling, it is predicted that water currents in the bay will require 14 days to move any discharge out to the Gulf of Maine. Nordic's discharge will create a continuous plume of approximately 108 million gallons of wastewater.

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. 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 these fully closed systems. 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. In a nutshell, 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.

Thank you for considering our concerns.

Sincerely,

Deanna and Doug Wolfire

Deanna Wolfire 202-215-4415