

February 11, 2020

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Good evening, chairman Duchesne (pronounced "du-shain"), BEP members, and representatives from the various permitting authorities. I am worried about the risks involved in the Nordic Aquafarms proposed plant.

Potential investors and supporters of large-scale salmon aquaculture plants like the one proposed for Belfast might want to take a step back. The Little River could easily become Maine's next abandoned industrial waste site, because the Nordic industrial development is unlikely to be either successful or sustainable using its current business model.

NAF's potential investors and the city of Belfast are speculating on a very large experiment using technology that could be outdated by the time it is operational but cannot be downsized or re-purposed because the business model will not work at smaller scales. This is important because there is no plan to pay for cleaning up the site if it fails or at the end of its useful economic life.

NAF has chosen to locate in a sensitive coastal watershed. It wants to exploit intertidal zone land that it does not own, one currently protected by both covenant and a conservation easement. Nordic's potential facility would have a direct, immediate, and long-lasting effect on the marine environment by discharging a whopping 7.7 million gallons every day of tepid, nitrogen-laced brine into Belfast Bay. That would not be healthy for a Gulf of Maine that is already warming faster than any other U.S. marine environment. It could spawn algal blooms that will affect coastal Maine fisheries, hamper other forms of aquaculture, and degrade recreation in Belfast Bay and points below it.

Water and energy use are also massive. Nordic is planning to draw more than 1,600 gallons a minute from the Belfast aquifer, which is in fine shape now but perhaps after saltwater incursion in the Nordic plant area will be needed by more actual Belfast, and Northport residents, and other businesses. Nordic estimates that it will use 900,000 gallons of diesel fuel annually to run the generators for an enormous facility whose lights and heat must be on all the time. Combined with the truck traffic to supply fish food (including an unspecified amount of fish meal from relatively depleted wild fish populations), run trucks to major markets far down the coast, and dispose of massive amounts of fecal waste, this energy use amounts to significant carbon emissions.

In conclusion, there are many reasons to doubt that the industrial development proposed by Nordic will ever be a success financially, technologically and environmentally given its current business model and environmental footprint. We hope that BEP and the permitting authorities will consider these risks seriously in their deliberations.

Thank you for the opportunity to share my concerns with you.