

Burke, Ruth A

From: Ethan Dubrow <edubrow@icloud.com>
Sent: Friday, February 14, 2020 1:12 PM
To: DEP, Nordic Aqua Farms
Subject: Opposition to proposed Nordic Aquafarms CAFO

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Dear Board of Environmental Protection:

I am a resident of Northport, Maine in the village of Bayside. I have been coming to Bayside and enjoying the ocean and clean air here for more than 50 years. I am strongly opposed to the proposed industrial fish factory in its present form for a number of reasons:

1. The amount of effluent that Nordic Aquafarms intends to discharge into the ocean a mere several hundred yards from my home. My 12 and 14 year old boys swim, kayak, sail and fish in that water almost daily in the summertime. The actual effects of the level of effluent discharge (over 7 million gallons per day!) is completely unknown. I have attended many of the informational meetings that Nordic has presented at, and the one at Troy Howard middle school where their ocean/current experts presented their modeling was not something that put my mind at ease. Nordic's own studies show effluent remaining in the bay for 14 days, and the flow of effluent is constant at over 100 million gallons per week. Nordic admitted that they did not do any data collection of their own for the modeling, and instead used buoy data from Fort Point, which is miles away. They could easily have done DEPOMOD data collection (by placing their own buoys) to produce much more accurate modeling (this is the industry standard for sea pen farming and is neither difficult nor expensive to do), but they have chosen not to. That in itself should give pause. If the permit is granted and the ecosystem of our bay is damaged and our waters polluted, it will be too late.
2. Nordic intends to extract significant groundwater. My home, on Tall Oaks Drive in the village of Bayside in the Town of Northport is on a well. Nordic's own experts stated in a presentation at the Hutchinson Center several months ago that our wells would likely be drawn down by their water extraction. But that we should not worry about it because they will recharge. This is from the same company that initially said that that the 1200 Gallons Per Minute of groundwater that they intended to extract from the Little River watershed was of little consequence to groundwater reserves. They have since had to modify that statement and admit that they cannot extract that volume of water without affecting the aquifer. Nordic's CEO, Erik Heim, has said that Nordic will "monitor" wells if asked. But he has not committed, nor provided funds by way of bond or setting money aside, for connecting homeowners to a municipal water supply if our wells go dry as a result of Nordic's extraction. If our wells go dry and our bay is polluted, our village will die.
3. Nordic's disregard for property rights and the rule of law. Nordic does not have undisputed Title, Right, or Interest to cross the intertidal zone and private property of certain landowners. And instead of attempting to obtain these rights, or choose a different location for their pipes, Nordic seems intent on obfuscation and litigation. I am including this issue because DEP should never have accepted Nordic's application until this issue was/is resolved.

There are many more reasons why I feel that this project is a terrible fit for our community, but I do not believe that they are in the purview of BEP or DEP. Ironically, when I first heard about the proposed project, I thought it sounded like a great addition to Northport and Belfast and the local economy. Unfortunately, the more information that becomes available, either by Nordic's own admission or news of their business dealings both locally and in other parts of the the world, the more it becomes apparent that Nordic is playing "fast and loose" with the science and the law, not to mention business practices. Nordic has no experience building a facility anywhere near this size. A smaller facility, brought on-line and shown to function properly, would be appropriate. Unfortunately this is not the path that Nordic is choosing, and Nordic's proposed facility is too dangerous to be allowed to proceed.

Thank you for your hard work and consideration.

Sincerely,

Ethan Dubrow
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Northport, Maine 04849