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Sent: Tuesday, February 18, 2020 4:25 PM
To: DEP, Nordic Aqua Farms
Subject: Nordic aquafarms public comments

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Re Nordic Aquafarms application public comment

Dear Board of Environmental Protection members and staff

I am executive director of Friends of Penobscot Bay, a waterkeeper affiliate

We are writing in opposition to the Nordic Aquafarm (NAF) project and urge the Board to follow its mandate and require an evaluation of the regional effect of adding multiple major water dependent industrial animal agriculture facilities to the Penobscot Estuary home of New England's largest remaining wild atlantic salmon stock.

The facts show that the Department of Environmental Protection has chosen not to be precautionary with the introduction of this new discharging industry to the estuary. It has not even required a description of the feeds to be used in the proposed NAF tankfarm, despite that being utterly essential to developing emission limitations

This is particularly unfortunate given the positive signs of commercial finfish and shellfish species restoration within Penobscot Bay and River, details of which the BEP has gotten from fishers themselves. The Department's actions to date have shown an unacceptable comfort level with substituting judgement calls for facts

This is particularly troubling regarding Paralytic Shellfish Poisoning Fishing industry experts have testified to the BEP, that unlike much of the Maine coast, Penobscot Bay's shellfish remain free of Paralytic Shellfish Poisoning, a toxic microalgae whose bloom can close so much of Maine coastal shellfisheries They have informed that Board that the additional nitrogen wastes anticipatable from Nordic Aquafarms, filtered though it may be, will still be a very substantial addition of nutrients known to trigger such harmful algae blooms. This in quantities magnitudes higher than Belfast's own Sewage Treatment Plant .

The Board should suspend review of the Nordic Aquafarms application until such time as a competent evaluation is made of the carrying capacity of Penobscot River and Bay for these proposed and planned significant new discharges, as would emanate from Nordic Aquafarms, from Whole Oceans, from Millinocket, and from the blizzard of new applicants who will be attracted to build and operate Landbased aquaculture tankfarms on Penobscot Bay and River thanks to a demonstrably weak level of state review and oversight.

If NAF is approved, with Maine DEP's laughably counter-precautionary approach to standards, it may well be found to breach that carrying capacity. then what?

Maine BEP has failed to reasonably consider the cumulative impacts to Penobscot Bay and River of hosting new unproven agribusiness industry that will dump immense amounts of waste nutrients and biochemo signal molecules at multiple locations along the route of the largest remaining runs of America's wild Atlantic salmon.

Penobscot Estuary is a dynamic zone, where the dissolved tincture of 8,000 forested square miles of interior Maine encounters the Penobscot Bay pressing its salty tides inland, e urge you to "think like an estuary" Estuaries like ours

are small enough and their flushing rate slow enough that while one of these landbased fish farms could be an lawfully defensible waste burden, multiple fish farm effluent discharges are another question. When the applicant proposes large continuous discharges especially rich with nitrogen, fish hormones and other biochemicals released by captive salmon it would could have a demonstrable unacceptable effect. The survival of smolts, elvers and alewives transiting the estuary in their migrations could be put at risk.

BEP itself risks triggering a goldrush scramble for permits and land based RAS leases along the lower river and upper bay.

To prevent this the Board need to require the department to produce a big picture of what decisionmakers can expect for the greater estuary if they approve going ahead with land based salmon tankfarming. This is vital to smart bay management.

We do NOT want to go down taphath of "pollute now, correct and cleanup later" by approving flurry of land based salmon farms pumping effluent into the Penobscot Estuary . But we will if BEP doesn't make the agency be precautionary by treating the Penobscot estuary **as** an estuary not merely "receiving waters" . Please do so.

Sincerely

Ron Huber

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