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February 18, 2020

Dear Maine DEP Staff concerned with the Nordic Aquafarms Proposal in Belfast:

My name is Lissa Widoff, and I am a resident of Freedom, Maine. I am contacting you concerning the Nordic Aquaculture Farms salmon factory proposed in the town of Belfast on the Little River. I have a number of concerns including the scale of the project, water quality impacts on Penobscot Bay from effluent, pesticides and antibiotics, local water and electricity usage and the fact that this proposal is NOT a closed loop system as it has been marketed to the community.

I have lived in Waldo County for over 35 years and in Maine for over 40. Although I am not a Belfast resident, my professional career has been centered in Belfast where I maintained an office for my professional environmental work as a policy analyst and most recently as Executive Director of an environmental foundation. I also served as a member of the state Board of Environmental Protection under Gov. Baldacci, and have professional experience as a field biologist, policy specialist, land protection specialist and community development consultant. You can see my professional experience through my [Linked In Profile](#).

AS I mentiOned, although I am not a resident of Belfast, I previously owned a rental property in Belfast and have seen the changes in that community through its redevelopment and resurgence into a vibrant town and county hub. I also believe that this project has suffered from miscommunication to the general public and a severe minimization of the scope, extent and potential impact of the project.

I have attended as many of the public meetings as I could and have come to the conclusion that aside from the gross intimidation of community members who have opposed the project, the environmental impacts, especially concerning water usage and effluent concern me. The problem to pollution is NOT dilution and this project very much relies on that principle. I urge the DEP to review with great care the extensive materials provided by others in opposition and particularly concerning the water consumption and treatment of waste. This is NOT a closed loop system as promoted by the developers AND the city council. Furthermore, there has been NO impact study on the potential consequences of groundwater drawdowns related to the project.

The process for public participation has also been faulty, but that issue has certainly come to your attention by now.

Some of my past professional work included supporting and promoting fishing communities. Penobscot Bay as you know is an extremely rich and diverse deep water coastal system. The deep water is desirable for many marine uses, and now also due to the volume of available water for this factory farm. The legacy of historic impacts on the bay, including mercury sediments that could be disrupted in the development are serious cause for concern as well.

Penobscot Bay. Especially in and around Belfast Bay has a very unique subtidal landscape, with particular geologic features that are less stable than presented. Furthermore, the Little River system on which the factory would be sited, have greatest ecological significance as demonstrated by the occurrence of significant wetlands as determined by the State.

The community members and Upstream Watch who have been most helpful in providing more detailed information to the City council, to the Planning Board and to DEP report a range of concerns that I share. I sincerely hope that the environmental concerns raised by myself and other community members can be heard, particularly with regard to the scale and number of impacts that could damage the ecological community and impact water, air and land in ways not fully outlined by the developers.

Lastly, the energy usage of this project (and associated generators, noise and air pollution) are not in support of Maine Climate Action plan and our efforts to reduce fossil fuel use. We must cease agreeing to reduce in one arena of effort only to increase usage elsewhere. I hope DEP and others will consider this issue as well.

I appreciate your efforts to fully evaluate the project, and I wish to express my full and unequivocal opposition to this project as proposed. Only a FULLY closed loop system could ameliorate the water concerns, although the complete loss of habitat for construction of this project seems to be both irrevocable and unnecessary.

I look forward to your conclusions on this matter and hope that the productivity and sensitivity of Penobscot Bay and the surrounding community will not be sacrificed. Thank you for your consideration

With kind regards,

A handwritten signature in blue ink that reads "Lissa Widoff". The signature is written in a cursive, flowing style.

Lissa Widoff
Freedom, Maine

Cc: Belfast City Council
Belfast Planning Board
Maine State Senator Erin Herbig
Maine State Representative Jan Dodge
Governor Janet Mills
Senator Angus King
Senator Susan Collins
Representative Jared Golden
Representative Chellie Pingree