STATE OF MAINE
BOARD OF ENVIRONMENTAL PROTECTION

IN THE MATTER OF

NORDIC AQUAFARMS, INC Belfast and Northport Waldo County, Maine A-1146-71-A-N L-28319-26-A-N L-28319-TG-B-N L-28319-4E-C-N L-28319-L6-D-N L-28319-TW-E-N W-009200-6F-A-N	))))))))))	APPLICATION FOR AIR EMISSION, SITE LOCATION OF DEVELOPMENT, NATURAL RESOURCES PROTECTION ACT, and MAINE POLLUTANT DISCHARGE ELIMINATION SYSTEM/WASTE DISCHARGE LICENSES

PRE-FILED REBUTTAL TESTIMONY OF TYLER PARENT

1. Rebuttal of testimony from Bill Bryden on December 13, 2019 including:
    a. The potential importance of the Little River and its tributaries to migratory fish; and
    b. The potential for impact from the planned facility discharge on wild Atlantic salmon.

2. Mr. Bryden's testimony is inaccurate because:
    a. The downstream-most dam on the Little River is impassable for migratory fish, meaning that the Little River cannot provide habitat for wild anadromous salmon; and
    b. The discharge contents combined with the dilution structures proposed for this project will minimize impact to the water quality of Belfast Bay.

3. Included in Mr. Bryden's testimony is a printout from an online mapping tool available through the "Nature's Network Project". In support of this map, there is text which further describes the data depicted, however this text is 100% copied and pasted from the Nature's Network website. There is no additional text to describe why this map or these descriptions from the website have been included, thus its relevance to the Nordic Aquafarms, Inc. ("NAF") project is not entirely clear.

4. Parts of the Little River are highlighted on the Nature's Network map under the Atlantic Salmon Habitat Suitability dataset. This indicates that Nature's Network has determined that greater than 10% of the highlighted area is suitable for Atlantic salmon. Mr. Bryden's inclusion of this map appears to indicate that the Little River and its tributaries provide viable Atlantic salmon habitat. While it is possible that these patches of habitat may be suitable for supporting some life stages of the Atlantic salmon, the dam at the mouth of the Little River prevents any fish from passing upstream. This dam was constructed in the late 1880s, and no fish passage has been possible since then. The Little River thus does not currently provide habitat to wild Atlantic salmon, which has been the case for more than a century.

5. In this case, Nature's Network is using these datasets to show areas that with modifications could provide viable habitat in the future, not to show habitats currently being used. As the Little River and its tributaries are currently inaccessible to migratory fish, the proposed Nordic Aquafarms facility will have no impact on the usage of the Little River by Atlantic salmon.

6. All facility water will be treated using an exhaustive filtration regimen prior to discharge into Belfast Bay. In my original testimony, I included a figure showing the projected concentrations of several water quality parameters that would comprise facility discharge water, and the corresponding values found in ambient Belfast Bay water. *See* Nordic Exhibit 22 at Table 1 (page 6). The facility's disease protection plan combined with the intake/discharge filtration systems will prevent impacts from discharge water on wild fish such as Atlantic salmon. Additionally, Mr. Bryden's testimony lists the receiving waters of Belfast Bay as Class A. This is incorrect. The water body is Marine Class SB. Nordic Exhibit 37 includes a table summarizing designated uses and criteria for classification of marine waters in Maine. This table comes from the Maine Department of Environmental Protection 2018 Proposed Re-Classification for Maine Waters. As discussed here and in my original testimony, the discharge treatment and facility disease protection plan meet the narrative criteria for habitat and aquatic life in Class SB waters.

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Dated January 14, 2020

By. _____
Tyler Parent, Normandeau Associates, Inc.

STATE OF NH
County of Rockingham, ss.

January 14, 2020

Personally appeared the above-named Tyler Parent and made oath as to the truth of the foregoing pre-filed testimony.

Before me,

Amber MacDonald
Notary Public / Attorney at law

AMBER D. MACDONALD
Notary Public-New Hampshire
My Commission Expires
March 21, 2023

Designated Uses and Criteria for Maine Marine Classifications

Class	Designated Use	Dissolved Oxygen Numeric Criteria	Bacteria Numeric Criteria	Habitat Narrative Criteria	Aquatic Life Narrative Criteria
Class SA	Habitat for fish and estuarine and marine life Recreation in and on the water Fishing Aquaculture Propagation and harvesting shellfish Navigation	As naturally occurs	As naturally occurs *except that enterococcus not higher than 8/100 ml (g.m.*) over 90-day interval or 54/100 ml(inst.*) in no more than 10% of the samples in any 90-day interval*	Free flowing and natural	As naturally occurs; no direct discharge of pollutants**
Class SB	Habitat for fish and estuarine and marine life Recreation in and on the water Fishing Aquaculture Propagation and harvesting shellfish Navigation Industrial process and cooling water supply Hydroelectric power generation	Not less than 85% of saturation	Enterococcus not higher than 8/100 ml (g.m.*) *over 90-day interval* or 54/100 ml (inst.*) *in no more than 10% of the samples in any 90-day interval* from *4/15 to 10/31* Not to exceed criteria of National Shellfish Sanitation Program for shellfish harvesting	Habitat for fish and other estuarine and marine life, unimpaired	Discharges may not cause adverse impact to estuarine and marine life in that the receiving waters must be of sufficient quality to support all indigenous estuarine and marine species without detrimental changes in the resident biological community. Discharge not to cause closure of shellfish beds.
Class SC	Habitat for fish and estuarine and marine life Recreation in and on the water Fishing Aquaculture Propagation and restricted shellfish harvesting Navigation Industrial process and cooling water supply Hydroelectric power generation	Not less than 70% of saturation	Enterococcus not higher than 14/100 ml (g.m.**) *over 90-day interval* or 94/100 ml (inst.**) *in no more than 10% of the samples in any 90-day interval* from *4/15 to 10/31* Not to exceed criteria of National Shellfish Sanitation Program for restricted shellfish harvesting	Habitat for fish and other estuarine and marine life	Discharges may cause some changes to estuarine and marine life but the receiving waters must be of sufficient quality to support all species of indigenous fish and maintain the structure and function of the resident biological community.

* "g.m." means geometric mean and "inst." means instantaneous level.

** Limited exceptions apply.