WATER QUALITY STANDARDS UPGRADE

Hello, my name is Peter Crockett, I live in Argyle Township along the western shore of the beautiful Penobscot River.

I see you people have a long day ahead of you & I find all 3 agenda items you will be addressing today have a deep & solemn effect on the health & well being of my immediate world, & all that lies down stream.

I am here today to speak for myself, as well as for all the life & creatures who are unable to speak for themselves, but are nonetheless profoundly effected by the decisions made by this board..

WATER IS LIFE!

The human body is about 65% water.

The human body CANNOT survive for more than 10 days without clean water.

The surface of the state of MAINE is about 12.8% water

EVERYTHING IS CONNECTED TO EVERYTHING ELSE!

We here in Maine have learned the hard way that big industry is not what will save us from financial ruin. They take everything they want & lie to get more. Do we need to go over all of the lies that brought the juniper ridge landfill into being? Do we need to go over all the lies from all of the heavy industry about saving jobs when they take the money & close the doors anyway?

I suggest we look forward & not waste any more time on what has proven to be a bad deal for Mainers! Heavy industry will always act in a similar manner as we have already seen. SO, we must look forward to better situations & better scenarios to create financial, & environmental security for our state, not what is good for the bottom line of multi-national corporations at the tax payers expense.

Maine is absolutely packed with natural resources, every one of these resources is finite! Every one of these resources immediately starts to degrade in value the moment the harvesting of these resources begins, with the single exception of one resource we have here in Maine in abundance. CLEAN WATER, clean, clear, sweet water, full of life. Refreshing, exhilarating, life affirming water, The elixir of life! This single resource is oddly enough able to increase its value as every single person who comes to Maine to experience the raw beauty we take for granted, goes back home & tells their buddys what a wonderful experience they had . The following year they bring more people along with them, & it just keeps growing from there.

It is obvious that one of the most important tasks we have as citizens & law makers in the state of Maine is to protect that which sustains us all.

I urge you to act in a manner which will protect the health & well of being of our entire state by protecting the health & quality of the abundant resources we have here in Maine.

I would like to present this document I have printed from a USGS site that shows a study of 19 landfills, finding 129 chemicals & toxins found in common landfill leachate. The state of Maine requires that JRL test for 7 toxins one time a year! It appears it is pretty hard to find something if you are not willing to look for it. All of this leachate is dumped into the Penobscot River after minimal treatment & testing.

As far as the adjacency rule goes, I am pretty sure that a rule change which would open up 1 million acres to immediate development is NOT the proper direction for our state & people to be heading in.

Thank you for the opportunity to voice my concerns today.

Peter Crockett
Argyle Township Maine

USGS science for a changing world

Environmental Health - Toxic Substances Hydrology Program

Pharmaceuticals and Other Chemicals Common in Landfill Waste

Signup

Landfill leachate contains a variety of chemicals that reflect our daily activities, U.S. Geological Survey (USGS) scientists concluded as a result of a nationwide study. Landfills are a common disposal mechanism for our Nation's solid waste from residential, commercial, and industrial sources. The scientists found that pharmaceuticals, personal-care products, and other contaminants of emerging concern are widespread in water that has passed through landfills, known as leachate. This study is the first national assessment of these chemicals in landfill waste in the United States.

This study of 19 landfills across the United States found 129 of 202 pharmaceutical (prescription and nonprescription), household, and industrial chemicals in untreated leachate samples (that is, prior to treatment and environmental release). The number of chemicals measured in the leachate samples ranged from 6 to 82 (with a median of 31). An analysis of the data revealed that landfills located in areas receiving the greatest amounts of precipitation had the greatest number of chemicals detected and the highest concentrations measured.

Leachate being collected from a manhole access point in an active landfill. Photo: Dana Kolpin, USGS.

The chemicals most frequently found during this study included bisphenol A, cotinine, N,N-diethyltoluamide (DEET), lidocaine, and camphor. The measured concentrations spanned six orders of magnitude—steroid hormone concentrations generally ranged from 1 to 100's ng/L (nanograms per liter or parts per trillion), prescription and nonprescription pharmaceutical concentrations generally ranged from 100 to 1,000's ng/L, and household and industrial chemical concentrations generally ranged from 1,000 to 1,000,000's ng/L.

Maximum concentrations and frequencies of detection observed for this study include:

Max Concentration	Percent Frequency of Detection	Chemical
7,020,000 ppt	55	para-cresol (plasticizer and flame-retardant, antioxidant in oils, rubber, polymers, and wood preservative)
4,080,000 ppt	95	bisphenol A (used in plastics, thermal paper, and epoxy resins)
705,000 ppt	65	ibuprofen (analgesic, antipyretic)
254,000 ppt	95	DEET (insect repellent)
147,000 ppt	90	lidocaine (local anesthetic, topical anti-itch treatment)
97,200 ppt	84	camphor (natural compound with medicinal uses and embalming)
51,200 ppt	95	cotinine (transformation product of nicotine)
2,590 ppt	75	carbamazepine (anticonvulsant and mood stabilizer)
168 ppt	55	estrone (natural estrogenic hormone)

This is the first step in USGS efforts to quantify the contribution of leachate from active landfills to the environment. The study is intended to inform policies for chemical disposal. For example, it is currently recommended that unused

New Permit
October 17, 2016

SPECIAL CONDITION

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. The permittee is authorized to discharge secondary treated waste waters from **Outfall #001** to the Penobscot River. Such discharges shall be limited and monitored by the permittee as specified below. The italicized numeric values in brackets in the table below and the tables that follow are not limitations but are code numbers used by Department personnel to code Discharge Monitoring Reports (DMR's).

OUTFALL #001 – Secondary treated waste waters

Effluent Characteristic	Discharge Limitations				Monitoring Requirements	
	Monthly Average	Daily Maximum	Monthly Average	Daily Maximum	Measurement Frequency	Sample Type
Flow [50050]	2.0 MGD [03]	Report MGD [03]	---	---	Continuous [99/99]	Recorder [RC]
pH [00400]	---	---	---	6.0 – 9.0 SU [12]	1/Week [01/07]	Grab [GR]
BOD_5 [00310]	667 lbs/day [26]	1,334 lbs/day [26]	Report mg/L [19]	Report mg/L [19]	1/Week [01/07]	Composite [24]
TSS [00530]	1,735 lbs/day [26]	3,670 lbs/day [26]	Report mg/L [19]	Report mg/L [19]	1/Week [01/07]	Composite [24]
Ammonia (as N) [00610]	---	---	4.9 mg/L [19]	10 mg/L [19]	1/Year [01/YR]	Composite [24]
Zinc (Total) [01092]	---	---	110 ug/L [28]	200 ug/L [28]	1/Year [01/YR]	Composite [24]
α Terpineol [51031]	---	---	16 ug/L [28]	33 ug/L [28]	1/Year [01/YR]	Composite [24]
Benzoic acid [77247]	---	---	71 ug/L [28]	120 ug/L [28]	1/Year [01/YR]	Composite [24]
p Cresol [77778]	---	---	14 ug/L [28]	25 ug/L [28]	1/Year [01/YR]	Composite [24]
Phenol (Total) [03604]	---	---	15 ug/L [28]	26 ug/L [28]	1/Year [01/YR]	Composite [24]
Mercury (Total) [1] [71900]	---	---	18.5 ng/L [3M]	27.8 ng/L [3M]	1/Year [01/YR]	Grab [GR]

PENOBSCOT NATION

DEPARTMENT OF
NATURAL RESOURCES

JOHN S. BANKS, DIRECTOR

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INDIAN ISLAND, ME 04468
TEL: 207/827/7776
FAX: 207/817/7466

Testimony of Daniel Kusnierz, Penobscot Nation Water Resources Program Manager
In support of Proposed Reclassifications for the Penobscot River basin

Good afternoon Chairman Parker and board members. My name is Daniel Kusnierz. I am the Water Resources Program Manager at the Penobscot Indian Nation, a position that I have held for 25 years. I am here today on behalf of Penobscot Nation to support the stream reclassification proposals that have been recommended in the Penobscot River basin. Most of the Penobscot basin proposals are ones that Penobscot Nation proposed to Maine DEP during its solicitation process in 2017 and are based on the results of water quality monitoring conducted by our program. This reclassification process is long overdue. The Clean Water Act requires that states and tribes review their water quality standards every three years. The last time that Maine conducted a comprehensive reclassification review was 10 years ago, in 2008.

The PIN Water Resources Program (PIN WRP) conducts extensive water quality monitoring activities throughout the Penobscot Nation territories, including the Penobscot River watershed. We have been monitoring water quality since the late 1980s and currently have 125 stations that we monitor regularly throughout the year. Through a cooperative agreement we share our data with ME DEP. Since 1997 over 400 hundred miles of stream segments in the Penobscot basin have been upgraded to higher classifications based on water quality data from our program.

The proposals that we have made for the lower West Branch and upper main stem of the Penobscot are based on water quality data that we have collected in these river segments that demonstrate that these segments are currently attaining the next higher class. In fact these segments have been meeting class B standards for at least the past 10 years. 38 MRS §464 subsection 4.F (4) states "When the actual quality of any classified water exceeds the minimum standards of the next highest classification, that higher water quality must be maintained and protected. The board shall recommend to the Legislature that that water be reclassified in the next higher classification." These proposed upgrades clearly meet this threshold to be recommended to the legislature.

The water quality data that demonstrate these improvements were collected over a long time period, from many locations, and during a wide variety of conditions, including periods of low flow and warm temperatures when we might expect problems. They also include periods when the East Millinocket GNP mill was operational. These data include dissolved oxygen, temperature, bacteria, and aquatic insects. Aquatic insect monitoring shows that class B aquatic life criteria were being met downstream of the mills in Millinocket and East Millinocket as far back as 1995, while both mills were operating.

One of the concerns we have heard is whether upgrading the lower West Branch and upper main stem Penobscot would prevent future discharges in the Millinocket area and impede redevelopment. Modelling by Maine DEP has shown that a discharge of similar levels (or even a

little larger) than that which was licensed at the former GNP Millinocket mill would still meet class B criteria. Furthermore, any new discharges would be expected to have more modern treatment than what existed at the old mill.

The only segment in these Penobscot proposals that is currently not attaining all class B criteria is the area commonly referred to as the "Back Channel" between the outlet of the Stone Dam at Quakish Lake and its confluence with Millinocket Stream. This is the original channel of the West Branch Penobscot River, which was dewatered and rerouted to the West Branch Canal through the GNP Millinocket mill. This segment is currently not meeting class B or C aquatic life criteria because there is very little water in the channel. The non-attainment is not a water quality issue, but rather one of water quantity or lack of sufficient water. ME DEP has indicated that getting water in this segment will be addressed in the next hydro relicensing of the Penobscot Mills project, scheduled for 2026. ME DEP has determined that the segment will attain class B aquatic life criteria by putting water in the channel under current rules and policy that would provide a wetted width of 75% of the channel width.

The recovery of Penobscot River over the past 10 -15 years is remarkable. Our WRP staff who are on the river nearly every day have witnessed great change. Areas of the river that once smelled badly, had sheets of foam, and were so dark that you could not see the bottom are now clean and clear. Blooms of algae or cyanobacteria that extended all the way from Dolby Pond to the coast are no longer present. Huge investments in money and efforts through collaborations by federal, state, tribal, industry, and conservation groups have and continue to remove barriers to fish migration. Numerous species of native sea run fish that were eliminated from entering the river are now returning to their historical spawning areas and restoring the aquatic ecosystems. In 2018, 2.27 million River herring, 3,929 American shad, 1,976 Sea lamprey, and 752 Atlantic salmon (listed as Endangered) passed the Milford/Orono dams. The proposal to extend the free flowing designation from the former Veazie dam to Milford ensures that this segment will remain barrier-free.

By supporting all of these Penobscot River proposals you are safeguarding improvements to prevent water quality from backsliding to conditions we do not want to go back to. By doing so you are helping to provide the water quality and habitat conditions needed for restoring these fish.

Thank you for the opportunity to comment.

will submit written comments as well

Natural Resources Council of Maine
3 Wade Street • Augusta, Maine 04330 • (207) 622-3101 • Fax: (207) 622-4343 • www.nrcm.org

Testimony in support of the Department of Environmental Protection's recommendations for the water quality reclassification of certain Maine waters

Nick Bennett, Staff Scientist

September 20, 2018

Good afternoon Chairman Parker and members of the Board of Environmental Protection (BEP):

My name is Nick Bennett, and I reside in Hallowell. I am testifying on behalf of the Natural Resources Council of Maine (NRCM) in strong support of the Department of Environmental Protection's (DEP) reclassification package before you today. DEP's package contains upgrade proposals for more than 400 miles of rivers and streams. These include the high-quality brook trout streams running into Webb Lake in Weld; Fish Stream near Patten, which runs through the spectacular Crystal Bog; and Back Brook in Limington, which has a wild brook trout population and the potential to support wild Atlantic salmon as well.

The proposal also includes the following proposals for the Penobscot River:

- **Upgrade the West Branch from the Millinocket area to Medway from Class C to Class B;**
- **Upgrade the Penobscot main stem from Medway to Mattawamkeag from Class C to Class B; and**
- **Require that the Penobscot main stem below Milford remain free-flowing to reflect the huge boost to the health of the river from the recently completed Penobscot restoration project.**

These proposals are very important. The Penobscot is coming back to life dramatically after centuries of abuse. The Penobscot Indian Nation, which has a unique record of river monitoring stretching back decades, has demonstrated that the West Branch from the Millinocket area and the main stem of the river between Medway and Mattawamkeag meet Class B standards and have been meeting them for many years. The upgrade of these segments in the Penobscot is long overdue. The rest of the Penobscot is Class B and has been for 15 years or more, depending on the segment.

More than two million river herring, thousands of shad, and hundreds of salmon passed above the new fish lift at the Milford Dam this year. They are able to do so because of the public and private investment of $60 million to remove the Veazie and Great Works dams and improve fish passage at other dams, all without the loss of electrical generation. This project took 16 years to complete and involved the work of thousands of people. This scale of investment is unprecedented in the recent history of the Penobscot watershed. DEP is right to propose expending the legal protection of the free-flowing characteristic of

the river from the area below the former Veazie Dam, which currently has this legal protection, to include the area below the Milford Dam. The state needs to protect and build on this enormous investment in river restoration and improved fish passage. Requiring upstream segments to meet Class B standards is also important for all of the new fish entering the river as they return to areas higher in the watershed that they have been unable to access for generations.

Class B is not a no-discharge classification. There were multiple mills discharging to the segments that became Class B in the 1990s and early 2000s. These segments included the towns of Lincoln and Old Town, where there were pulp and paper mills discharging at the time the river became Class B. DEP's water quality modeling also shows that the segments it has proposed for upgrade in this package—near Millinocket, Medway, and Mattawamkeag—would meet Class B standards even with a discharge of about 4000 pounds per day of biochemical oxygen demand (BOD).

BOD is the most common measure of organic waste that comes from sources like pulp mills and sewage treatment plants. To put 4000 pounds per day in perspective, I have attached a chart I generated from EPA's Enforcement and Compliance History Online[1] database showing monthly average discharge levels for the Verso Androscoggin Mill in Jay since July, 2015. This chart shows that the Verso mill has not discharged more than 2900 pounds per day of BOD as a monthly average over the last two years. Thus, very significant new industry could move into the Millinocket area, and the segments DEP is proposing for upgrade would still meet Class B standards.

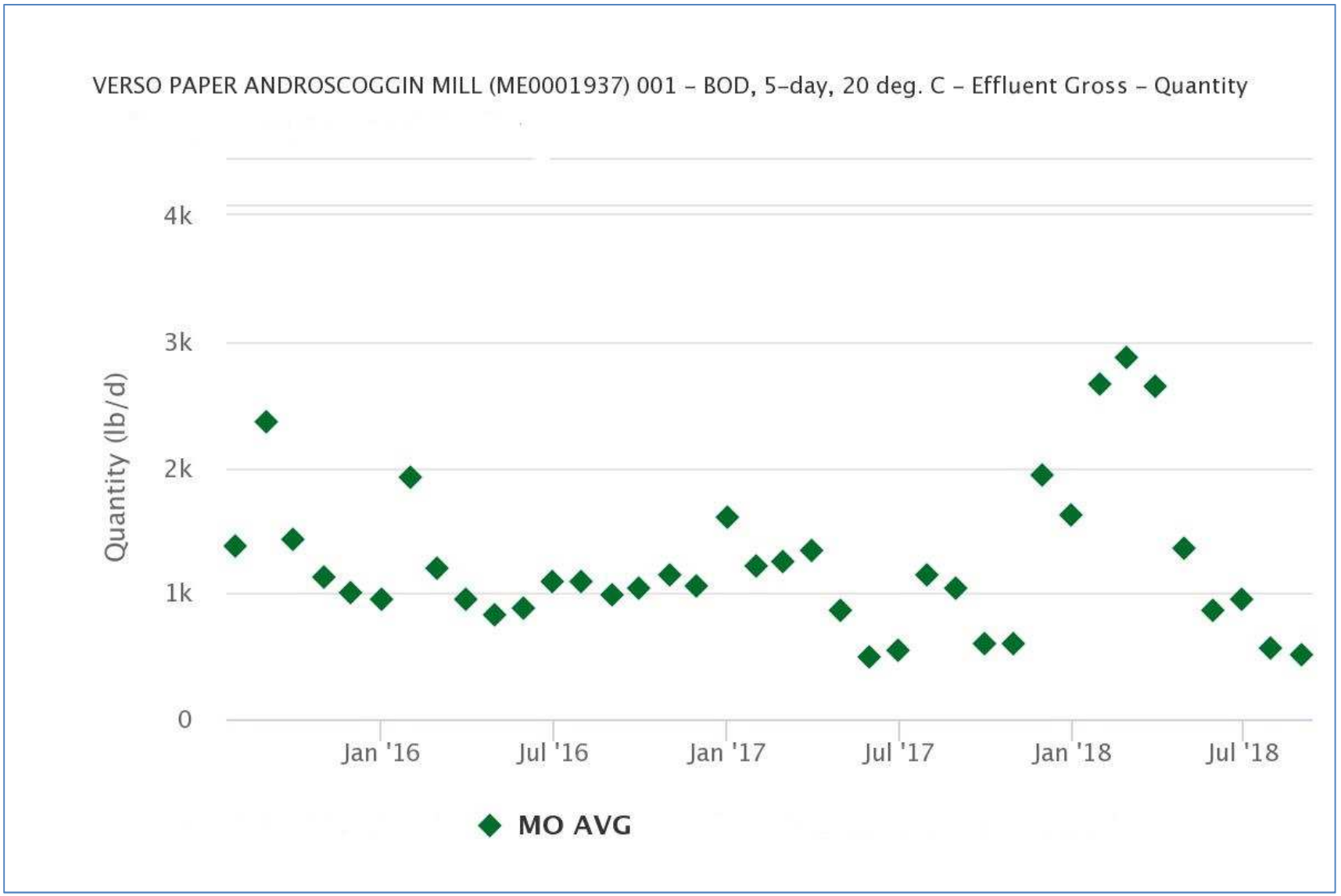
We know that people in the Millinocket area are working hard to recruit new industry. We applaud that, but we think that the new industry should be respectful of the value of the Penobscot to so many Mainers living downstream. Asking that new facilities meet Class B standards is very reasonable.

Conclusion

NRCM strongly supports DEP's proposed package of upgrades. Maine law (38 M.R.S. § 464(3)(B)) requires that DEP present the BEP with a reclassification proposal at least once every three years. The DEP has not done so since 2009, so this package has been a long time coming. In Maine, unlike in many other states, the job of setting final water quality standards belongs to the Legislature. The BEP's job is to review proposals for upgrades and recommend that the Legislature make a decision on them. Given how long it has been since the last reclassification package and the outstanding quality of the rivers and streams in DEP's proposal, we urge the BEP to send the full proposal to the Legislature for review. We believe this package of upgrades is of statewide significance, and the Legislature should review and decide on all of it.

I would be happy to take any questions. Thank you for the opportunity to testify.

[1] Accessed at: https://echo.epa.gov/


VERSO PAPER ANDROSCOGGIN MILL (ME0001937) 001 - BOD, 5-day, 20 deg. C - Effluent Gross - Quantity
Quantity (lb/d)
4k
3k
2k
1k
0
Jan '16
Jul '16
Jan '17
Jul '17
Jan '18
Jul '18
MO AVG

Testimony of Dennis P. King to the DEP Regarding the Reclassification of The Penobscot River—September 20, 2018

Members of the Board of Environmental Protection:

Thank you for the opportunity to address you regarding the matter of upgrading sections of the Penobscot River to Class B and also require that the main stem below Milford remain free flowing.

I am a a resident of Freeport, a native of Old Town, and one who has maintained a close relationship with the Penobscot and other rivers in Maine. Having recently retired as a hospital administrator serving in 12 hospitals around Maine, I appreciate the progress made in improving the water quality in our rivers after decades of industrial use.

Like most people in Old Town, I grew up on, near, or in the river. After all, the town (and some of my relatives) depended on the Penobscot for a livelihood- whether it was working in one of the mills on its shore, processing wood brought in on huge log rafts, or fishing in its many deep pools-- before it became too polluted to do so safely.

While in my first year at UMO in 1968, I had the good fortune to to be offered a Summer position with the Atlantic Salmon Commission as a biologist aide working on the restoration of the Atlantic Salmon to the Narraguagus, Machias and Penobscot Rivers. There , I experienced first-hand that a State/Federal partnership to restore and maintain gamefish is a win-win for people, fish, and the environment. Thus, a long process began to clean up the river by eliminating dams, constructing fish passage ladders and eliminating major sources of industrial pollution.

Within several years, the historical magnificence and potential for renewal of this river was being realized.

I cannot accurately describe to you the emotional impact of holding and recording the vital statistics of a fish that began its life in a hatchery in Maine and somehow survived the rigorous ordeal down the Penobscot River. Against considerable odds, the young salmon then swam on to the North Atlantic near Greenland only to then find its way back after two years to spawn in the Penobscot.

Soon after taking an administrator position at Eastern Maine Medical Center in 1990, I learned that there were therapeutic aspects to the river's renewal. The construction of a multistory patient tower high on the Penobscot's bank afforded patients and visitors a magnificent and unobstructed view of the river. It was-and still is- very common to see patients and visitors gathered around the large windows watching the bald eagles soaring on high and looking for the next meal! This rare opportunity serves as a distraction for those in recovery and remains a reminder of the wonder of nature seen up close.

Our State's commitment to cleanup our rivers is not only good for the fish, but the removal of dams has also made our rivers more accessible to tourists who raft, canoe or motor, thus attracting tourists (and dollars) to areas previously thought too far away.

I encourage the DEP to act favorably to upgrade the classification to Class B of the West Branch of the Penobscot River from Millinocket to Medway ; upgrade the main stem of the river to Class B from Medway to Mattawamkeag, and also require the Penobscot river below Milford be free flowing to the sea.

Thank you `
.Dennis P. King

To: Maine Department of Environmental Protection and Board of Environmental Protection
From: Maulian Dana, Penobscot Nation Tribal Ambassador
RE: Testimony Regarding Water Quality Classification on Penobscot River
Date: September 20, 2018

Good afternoon and thank you so much for the opportunity to address this important issue that affects so many in our beautiful state. My name is Maulian Dana and I serve as the appointed ambassador of the Penobscot Nation. I have lived my whole life on the reservation community, Indian Island, and I am raising my children on the banks of the river where I spent my own childhood. My role now is to represent the Nation as a diplomat and advocate for our people as well as communicate and maintain and build relationships with local, state, and federal governments and entities. Today this feels especially meaningful for me because I have the honor of speaking in support of a cleaner Penobscot River which has supplied my tribe with a deep connection to our ancestors and continues to give us life.

The Penobscot Nation consist of islands in the main stem of the river with Indian Island being the most inhabited. We have an inherent sovereign right to sustenance fishing in the river and many of our citizens hunt the islands and gather natural materials and medicines on the lands and waters. We also have entrepreneurs and business owners who guide and utilize the territory in responsible and harmonious ways. The river is not just a backdrop to our home or what flows around the lands. It is a part of our family, a part that we owe so much of our lifeways, livelihood, cultural knowledge, and traditional practices to. The health of the Penobscot people is critically dependent on the health of the Penobscot River.

I am here today to speak in support of reclassifying the sections of the river marked in the documents from class C to an upgrade of class B. I also want to thank the DEP and the Board for making this hearing possible and proposing the upgrades. As you will hear or have heard already from our natural resources department the science and data supports this change as well. It is a fact of the natural world that water flows and if we can keep a more pristine level at the northern waters then the river that reaches Indian Island and other reservation territory will be much more suitable for our sustenance and other uses.

I have personal reasons to address this issue and submit testimony in addition to my work for my people. I grew up on the reservation and was warned against swimming in the river or eating fish from it. At age eight I was worried when I saw the clumps of foam from the discharge from the mills and other industry or saw floating dead fish or smelled the fumes of pollution from the water while in a canoe or on the shore. Around this age I was so moved by my feelings about the state of the river that I wrote a poem that was published in a local paper and reminds me now of my childhood senses being overwhelmed with a need to care for the river and speak up for it. Now I get to do that and I am ever humbled and honored.

My children are now 9 and 11 and they are able to swim in the river without experiencing the poisonous sights and smells that I did at their age. The fact that one generation of cleaning up the river has had such an impact makes me very hopeful for the continued improvement. The progress can be credited to the work and efforts of many dedicated individuals, coalitions, agencies, and the drive to protect the sacred. Our Nation joins a sophisticated approach with studies and on the ground research coupled with a deep sense of our roots as a people of the river to keep the efforts to care for the conditions of the water prolific and productive. We have seen great strides in the work to restore much of the health and vitality of our homeland and we are constantly engaged in how we can make it even better.

We understand the calls for industry and development especially in economic climates that have bene unfavorable in recent years pushing families and communities to hardship and struggles. The fact remains that we only have one mother earth. And she needs us all on the same page. We don't get a second chance planet. I would encourage developers to consider projects that provide stimulation and growth but also promote sustainable practices that can be in line with the appropriate level of classification for the river. Our research shows that the water has been consistently at "b" standards and we do not need to be taking any steps backwards.

I was able to paddle the Penobscot River from Indian Island to Medway and then up through Ambejejus Lake recently as part of our tribal ceremonial journey from Penobscot Nation to Katahdin. There used to be a noticeable difference in the quality of the water from the river to the lakes in the clarity, appearance, odor, life present, etc. Multiple times it struck me on this last trip that the river water was so much more like the lake water and it is just so much cleaner and healthy looking. They say water is life, and the river right now has much more life to give us because we have been caring for it. Gone are the days of chunks of foul smelling foam and toxic air, and we better for it. All of us.

On behalf of my Nation I implore you to upgrade the classification from "c" to "b". When I see my children swim in the water I think about the times of my great grandparents when Indian Island had dirt roads and a ferry to the mainland instead of the bridge and I think about the promises those ancestors made to protect these important strands of our web of life. I think we are at times very in line with those promises and I celebrate allies who appreciate our values and have helped us so much. Even at times when tension and turmoil over the river can seem to take the front seat I am encouraged by the willingness to build partnerships and exchange compassion and understanding between the Nation and different entities. We all benefit from taking care of the earth.

I thank you again for your time and for this opportunity. I hope my words speak to your heart and you can hear 8 year old me speaking up out of love and empathy for the river. This is a great chance to keep progress alive and contribute to wellness and the beauty that makes Maine the place where we are all privileged to call our home.

TOWN OF MILLINOCKET
John Davis, Town Manager
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September 20, 2018
Prepared Testimony of John Davis
Before the Department of Environmental Protection
In the matter of 2018 Proposed Re-Classification for Maine Waters

Members of the Board of Environmental Protection:

My name is John Davis and I am the Town Manager of Millinocket. I speak today in opposition to the Board's proposal to change the water quality classification in our region.

Thirty years ago, Millinocket's mill provided over 4,000 well-paying jobs. Then the closing of the mill changed the town dramatically. Our population declined, taxes soared and families shattered. A dynamic community formerly thought of as one of the more prosperous in the State faced unprecedented hard times.

Since the closure of the mill in 2008, substantial efforts have commenced to locate industry on the former mill site. Our attempts are coordinated and comprehensive, seeking to place suitable industries of a diverse nature to rebalance and energize the region's economy.

In spite of daunting challenges, a private, non-profit organization comprised of skilled volunteers has taken on the task of moving the region's economy forward. In 2017, "Our Katahdin" purchased the mill site with the intent of redeveloping it as a modern industrial park, and on July 4, 2017, they signed an agreement to form a public-private partnership with the Town of Millinocket. In a very short period, we have embarked on a course of concerted action that I am confident will bring results that further diversify the economy of the region.

But now, our confidence, and the confidence of those considering committing significant economic resources to our region, is imperiled. Do not underestimate the effect of uncertainty created by the current proposal. The loss of our class C qualified industry does not mean that we no longer require the classification. The dampening effect is two-fold. Not only does your proposal visit uncertainty upon our serious prospects, it precludes countless other potential prospects from even considering Millinocket as a site location.

Another concern is that under a B Classification, the numeric criteria for Bacteria (E. coli), would decrease and make it more difficult for our Wastewater Treatment Plant to meet the State standards. We are then forced to find money to upgrade in the absence of a tax base that can undertake such an endeavor. The irony of that situation should not be lost on anyone here.

While those advocating the change no doubt mean well, the reality is that the proposed changes are, at their core, anti-economic development. Our region desperately needs growth. While our tourism economy has made excellent strides, it cannot be the sole cornerstone of our new economy. The paper industry taught us that the first time around—and it is incumbent upon us to not let that happen again. Our region needs a diversified, resilient economy providing good-paying jobs and promise of growth. Re- classifying the water quality standard at this juncture will permanently harm our new competitiveness while ignoring the economic hopes and needs of an entire region.

In conclusion, I believe that the activities of Our Katahdin and others to reverse the fortunes of the Town of Millinocket by attracting new businesses and diversifying the economy are solid reasons to reconsider the proposed re-classification or at least defer it to a future date pending further study of industries that actually locate here. Thank you.