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From: Judy Berk <judy@hollandandfoley.com>
Sent: Monday, February 03, 2020 9:10 PM
To: DEP, Nordic Aqua Farms
Subject: Testimony on Nordic Aquafarms Belfast proposal

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To whom it may concern at BEP/DEP, It looks like I will not be able to attend the Tuesday night BEP hearing in Belfast, so I am submitting my comments here in writing, via email. Thank you for your consideration.

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To the Maine Board of Environmental Protection,

Nordic Aquafarms proposal to build a land-based recirculating salmon farm in Belfast has stirred curiosity, learning, and strong emotions in residents of Belfast and Waldo County. A number of folks have asked what I think of the proposal, because I worked in the environmental field virtually all of my professional life and have called Waldo County home since 1975.

I have worked for environmental protection virtually all of my 40 plus year working life. In the 1970s I managed Belfast's first environmental store – "Alternative Resources." It was located at 101 High Street, where part of Darby's Restaurant is now. There I sold hundreds of woodburning stoves, and many solar collectors, composting toilets and other environmentally-friendly products. At that time, I also wrote a newspaper column called "Power Play," which focused on reducing the environmental impact of our energy choices. The column appeared in the Republican Journal and two other Maine papers. Since that time, I co-founded

Maine's Energy Extension Service, served as Executive Director of the Maine Solar Energy Association, and as a volunteer board member for our local land trust for nine years. I also served on the town of Northport's Land Use and Solid Waste Committees, and for the last 28 years, I worked full-time for the leading statewide group protecting Maine's environment.

During my tenure there, among other things, I had the privilege of working with others in the Kennebec Coalition and Penobscot River Restoration Project to help restore populations of native, sea-run fish, including endangered wild Atlantic salmon. We opened up 2,000 miles of Penobscot river habitat for eleven species of sea-run fish. We also opened key junctures in the Kennebec river watershed, so that more than 4 million alewives (river herring) now reach their spawning waters – a recovery that amazed all of us.

I suspect there's broad agreement that protecting wild salmon is important, but one issue that I have not heard discussed much in Belfast is the fact that raising salmon in open net-pens in the ocean, as is now practiced in Maine and elsewhere, is a major threat to wild salmon and their habitat:

- Fish raised in net pens can and do escape and mate with wild salmon, which weakens the gene pools of our native fish that have evolved over thousands of years.
- Fish raised in net pens can spread diseases and parasites to wild salmon and other aquatic creatures.
- Net pen aquaculture also allows chemicals, fish feed, and completely untreated fish feces to pollute Maine waters.

Here in Belfast, Nordic is proposing a different method – a land-based recirculating aquaculture system (known as RAS, for short). The type of system Nordic is proposing will avoid these serious problems that happen at net pen fish farms.

The Nordic proposal can also reduce the pressure from overharvesting fragile wild fish populations. And, it can reduce US fish imports. Currently the U.S. imports 90 percent of fish that we consume, according to NOAA. Think about that – 90 percent. We’re pouring money out of the country to buy fish from away and polluting to move it here too. And, 100 million people live within a one-day drive of Maine making Belfast a far closer source with a far lower transportation footprint

Wouldn’t it be nice if we could raise some of that fish in an environmentally safe way here in Belfast? I think we can.

Land based salmon aquaculture, like Nordic has proposed:

- Keeps farmed fish from sharing diseases and parasites with wild fish, so antibiotics and harsh chemicals aren’t needed.
- Prevents feces from contaminating the sea floor and waters, and lets poop be harvested instead to nourish crops or create biogas.
- Ensures that water meets federal and state standards for Suspended Solids, Oxygen Demand, Phosphorous and Nitrogen before it can be released into Maine waters.
- Allows more efficient fish feeding, wasting less energy and nutrients, and causing less pollution of coastal waters.
- Prevents fish from escaping and interbreeding with endangered wild Atlantic salmon populations, jeopardizing restoration efforts.

From what I have seen and heard, what the Nordic folks are proposing makes sense. I believe their proposal deserves fair consideration by the BEP, and before other regulators.

I have seen lots of evidence that welcoming Nordic to our community will save taxpayers money and that there's plenty of water to supply their needs. I have seen no evidence that the treated water from their facility will affect the health of local waters or their inhabitants or ecosystem.

It seems the company has committed to go above and beyond requirements in many ways – They commit to not raising GMO fish, and not using any growth hormones, antibiotics, or pesticides. They will install solar panels on their buildings and use Maine made biofuel.

Here's the deal: I think people are going to continue to eat fish. I think that wild fish populations are not going to be able to sustain this hunger.

RAS offers an improved way to farm fish more sustainably here in Maine. It takes pressure off depleted wild fish populations. It gives Maine an opportunity to diversify, strengthen, and build on our fishing heritage. It will also contribute to our community by bringing jobs, local food, and lower taxes to Belfast – the shiretown of Waldo County.

I hope and trust you will give this proposal a fair shake. Thank you for your consideration.

<https://www.fisheries.noaa.gov/national/aquaculture/us-aquaculture>

“By value, nearly 90 percent of the seafood we eat comes from abroad, over half of it from aquaculture. Driven by imports, the U.S. seafood trade deficit has grown to \$14 billion in 2016.”

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