

February 17, 2020

Dear Members of The Maine Department of Environmental Protection:

I would like to share some concerns about and requests regarding Nordic Aquafarms' proposed Belfast facility.

Dr. Hopek of the BEP stated that a water modeling plan has not yet been submitted and that he would expect two-plus years of monitoring before start-up of Phase I. I have long been of the mind that not enough testing in many areas has been done, and request that this recommendation be followed.

Dr. Podolsky from Upstream Watch noted that one would expect significantly more research for a half-billion dollar, huge footprint project than what has been done. The BEP asked what additional studies/information he recommended and he named the following: 1) full biological surveys through all four seasons, and 2) a proper impact study of the discharge as a permanent impact, especially thermal. I request that Nordic be required to conduct these tests.

Dr. Podolsky also pointed out that two and a half years of surveys and thousands of hours of observations were conducted on North Haven for a 14 million-dollar project to install wind turbines on 70 acres. In contrast, Nordic did just 16 days of field study. Again, I believe adequate testing must be carried out.

Ms. Bensinger stated that there could be a requirement for well remediation, because the BEP could not rely solely on a monitoring plan. If this project comes to fruition, I believe well remediation must be required. Because I have seen Nordic be less than honorable, I believe ironclad wording would be essential.

With respect to well remediation, I am very concerned about how absolute dominion would play out, especially with climate change and the real possibility of less rain. (While last summer brought some rain, the summers of 2015 when I moved to Belfast, through 2018 were very dry. And so far, this winter has not brought much moisture.) Would well remediation cover **all** residents of Belfast, Northport and Belmont who draw from the same aquifer from which Nordic would draw? I assert this should be essential.

No sampling has been done along the current proposed pipeline route. Since 12 tons of mercury were dumped in the Penobscot River in 1969 that absolutely should not be disturbed by construction equipment, so I request that this sampling be done.

Nordic does not have a plan for air emissions during the potential construction. Has the BEP considered safety around this?

The state fisheries veterinarian stated the importance of preventing, eliminating or managing problems such as viruses in order to keep the effluent free of pathogens and medicines, along with having a good source for eggs, good water **and a stress-free environment**. Studies have shown that fish feel stress that can result in lowered immunity. A stress-free environment would be their natural habitat, not swimming in circles in a pool packed densely enough with other fish to turn a good profit.

Nordic seems to believe that people *need* farmed salmon. That is simply not true. Many studies show plant-based diets provide enough protein and health benefits that exceed those from animal protein. We also have locally raised meat, chicken and eggs that keep profits in the community. Another source of local protein that is currently rebounding is fish! Now that most of the dams have been removed, we are seeing a rapid recovery evidenced by more fish, including young fish that spawn nearby. I believe we should not take any risks with the bay so the rebounding will continue and once again we will have a bay teeming with fish.

Finally, Governor Mills has established significantly lower carbon emission standards for Maine to attain in the near future and longer term. Nordic's facility would cause a very significant increase in Belfast's emissions. And now or in the near-term future, there are/will be newer and way more efficient and safer aquaculture methods to employ.

Thank you for your consideration and for holding the hearing in Belfast.

Sincerely,
Natalie Charles
Belfast