

To: Maine Board of Environmental Protection  
From: Greta Zorn Gulezian, Lincolnville, Maine  
Re: Nordic Aquafarms Proposal

17 February 2020

I reside in Lincolnville, Maine and am a Belfast, Maine taxpayer. Having attended all but one day of last week's Public Hearing in Belfast, I am now writing to express my concerns re: the \$500 million proposed concentrated salmon feeding factory proposed by Nordic Aquafarms.

Over the past 2 years, I have been present at multiple Nordic Aquafarms public information events and Belfast Planning Board meetings. Hearing the sworn testimony given by multiple panels of experts about this massively-scaled project at your Public Hearing has deepened and added to my already serious concerns.

An undertaking with the magnitude of this project (at full build-out, 33,000 metric ton of salmon produced annually...which is approximately 70 million pounds of fish annually) must have a sound financial foundation as well as some credible evidence that Nordic can make a profit. According to sworn testimony by a certified public account, Nordic has not provided evidence or demonstrated in their permit applications documents that are required by the Site Location of Development Act (SLODA) Section 3B. The witness found Nordic's application to be incomplete in 5 requirement categories. One example follows: a letter from an appropriate financial institution indicating an intent to provide financing is a requirement of the permit application. The required letter specifically indicating an intent to provide funding is not provided.

According to Nordic submitted testimony, the company has raised cash equity of \$63,661,189, which is equal to 12.7% of the total cost of the Belfast proposed project. 20% of the project cost is considered standard. Not all of this \$63,661,189 is dedicated to the Belfast project since Nordic has a second RAS project proposed in California.

Nordic has not submitted cash flow projections as required.

Nordic has not provided any credible evidence of their ability to make a profit. (The Recycling Aquaculture System industry thus far has a history of financial losses and failed ventures.)

I strongly encourage all BEP members to review the submitted sworn testimony of M.L. Reeves, retired CPA. During Ms. Reeves oral testimony on Tuesday, 11 February, she stated that small business owners applying for a bank loan were required to provide more evidence of financial capacity than Nordic has submitted in their permit application for this project projected to cost \$500 million.

In addition, Nordic has declined to establish a performance bond that would be used to clean up, decommission and restore the site should their operation fail or to be used at the end of their operation. Without a stringent performance bond condition in the permit, the taxpayers would

be left to foot the bill for Nordic's failures. This is unacceptable. If Nordic believes this project is good for our community, then it stands to reason that they be responsible for their actions in our town.

While many aspects of Nordic's application seem to have insufficient information (i.e. no demonstration by the Applicant of a comprehensive characterization of the greenfield site location, or baseline assessment of current Belfast Bay/Penobscot Bay conditions, including currents, which will be receiving 7.7 million gallons of NAF discharge water daily as 2 glaring examples), the sworn testimony from several NAF witnesses gave levels of uncertainty to basic questions. I heard 3 BEP board members ask a variation of the following question: "What is the amount of water that will be used by this project?" No clear answer was provided to this fundamental question. How, then, can the Board of Environmental Protection know what it is they may be permitting?

Comprehensive baseline data needs to be collected as to the current condition of these areas of concern before permits are issued. The quality of such data collection after construction has begun seems to be of little use. When so many different permits are required, it would seem appropriate and prudent for an integrated evaluation such as an environmental assessment and/or an environmental impact statement be done.

The siting and scale of this massive project, the lack of demonstrated financial capacity and insufficient data in the Applicant's permit applications demand that this proposal be rejected as they currently stand.

Your time and attention to *protecting our environment* are much valued and appreciated as you serve our public interest and the public good. The decisions you make on these permit applications will set precedents for greenfield development in our state into the future.

Thank you for considering my concerns and comments.

Sincerely,

Greta Zorn Gulezian  
Lincolnville, Maine