



Islesboro Marine Enterprises, Inc.

127 Marshall Cove Road

Islesboro, ME 04848

207-734-6433

2/17/2020

Board of Environmental Protection
c/o Ruth Ann Burke
17 State House Station
Augusta, ME 04333-0017
NordicAquaFarms.DEP@maine.gov

Dear Members of the Board of Environmental Protection,

I am writing today, as a mussel grower in Penobscot Bay to express our concern about potential water quality impacts of Nordic Aquafarms proposed finish farm in Belfast's Little River Water District.

We are the farm managers, partnering with Joe Larrabee to grow mussels on lease site PEN BB, a short distance directly down stream from the proposed discharge pipe, which has been in operation since 2004. We also maintain our own lease site PEN Fix in west Penobscot Bay near Flat Island of Islesboro. We believe aquaculture, when done responsibly, is an important sector for Maine's economy. Islesboro Marine entered the aquaculture sector in 2017, employs 5 people year round, and anticipates harvesting 250,000 lbs. of native blue mussels in 2020. Water quality is crucial to the viability of our business.

Based on our review of the Nordic Aquafarms proposal and statements made at last week's hearing we find the following must be addressed to ensure the proposed farm does not negatively impact the bay's water quality.

- One consultant that completed part of Nordic's natural resource analysis made statements at last week's hearing that he was not aware of our farm, and that water quality for shellfish harvesting was not a concern because there was no such activity in the area. We have had several conversations with Nordic Aquafarms staff, who are very much aware of our presence. It is incredibly concerning that this kind of statement was made, and we are concerned about how this lack of information of some members of the consulting team has impacted the reliability of the impacts projected in their natural resource analysis.
- At the hearing, a consultant also conceded that elevated mercury levels was found in seafloor samples where a dredge would take place. We strongly opposed any practice that would risk resuspension or further dispersal of mercury contamination. This is of concern because of the close proximity of the PEN BB lease site.

- It is critical that this project has a much more robust third party, frequent and ongoing water quality monitoring system in place, than what is currently proposed. This system needs to set aggressive critical limits to ensure no negative water quality effects that impact current and future harvest of shellfish, and other fish species. This needs to be partnered with a strong operational protocol for halting water discharge immediately should water quality testing show deterioration beyond critical limits, to ensure that effluent is not negatively impacting existing marine industries.
- Finally, we ask for the Board of Environmental Protection to look at how Nordic Aquafarms proposed discharge will impact Penobscot Bay in combination with the discharge from the salmon farm that was permitted recently in Bucksport. We recognize that ultimately it will be the combination of both farms that may impact those down river, and it is our hope that Maine can embrace new natural resource industries while developing protocols to ensure that it is not to the detriment of existing livelihoods.

Thank you for the opportunity to comment and am happy to provide additional information as requested.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Shey Conover', with a long horizontal flourish extending to the right.

Shey Conover