

## Burke, Ruth A

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**From:** schlueter.eric@gmail.com  
**Sent:** Tuesday, February 11, 2020 11:56 AM  
**To:** DEP, Nordic Aqua Farms  
**Subject:** BEP

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Dear Maine Board of Environmental Protection,

Are the current Maine BEP guidelines adequate to properly evaluate Nordic Aquafarm (NAF) permits if the State (and City of Belfast) want to be carbon neutral by 2045? How do the guidelines compare to the Paris Agreement? NAF said that Norway has higher environmental standards than the United States would their proposed plans meet Norway's higher standards? I realize that is not your job to know that but it's something to think about. I ask this question because if NAF does not succeed or chooses to sell might there be stricter environmental guidelines in the coming years that would not even be considered a facility of this scale, and type to be built in the proposed location or perhaps anywhere.

In an article in The Free Press 12/6/2018 When NAF was asked at a community forum on November 28 2018 "why the company can't recycle the water rather than discharging it. Noyes (NAF Chief Technology Officer) said "that isn't possible because, for biosecurity purposes, the company will isolate the fish from each other in various cohorts and grow units and then take all of the discharge water and solids to send to one centralized water treatment plant.

"So if you mix all that water, for biosecurity purposes you would not then want to send that back to those individual units," said Noyes. "You have then eliminated all the biosecurity barriers you created by separating those units."

I am not a scientist but how I understand that is NAF doesn't trust their treatment facility enough to not contaminate their fish but they have no problem risking the health of the Bay? I don't know the numbers but in addition to the fresh water NAF will be using many gallons of water (I don't have the numbers but I'm sure you do) from the Bay and NAF has stated they will return the water from the Bay cleaner than when it was taken out. Again I am not a scientist but if it really takes 2 weeks for the Bay to flush out and water is being taken out of the Bay and "cleaned" and put back into the Bay along with lots of fresh water and perhaps high levels of nitrogen and the Gulf of Maine is the fastest warming body of water on earth how is it possible that over time the fragile biodiversity of the Bay wouldn't be destroyed? And what effects would that have on the smaller locally owned aquaculture business Maine supposedly wants to promote and support and would be better for the environment and be more sustainable, not just financially but environmentally.

When I have heard NAF use the word sustainable it has frequently been followed by the words financially or economically and not environmentally. I have heard there will be monitoring of the discharge and other things that might have a negative impact on the environment, (which is sort of ridiculous because just building the facility is a negative impact on the environment) and that NAF would be fined if any adverse environmental impacts occur. I am guessing they have a budget for fines so I don't think fines are a big threat to make sure they don't hurt the Bays biosecurity or air quality. Since they have to be operating 24/7 I don't see them ever being forced to shut down. I am not an economist but it stands to reason if the main drive for Maine to have this facility built is to help the Maine economy then if NAF fails Maine, predominantly Belfast, would financially suffer. So if they start having environmental "accidents" which probably can't be easily fixed with fines who will be left with a damaged environment and perhaps financial problems and who would just go file bankruptcy?

I am also concerned about the amount of dust that potentially will be in the air over the several years of construction not only for wild life but for the animals owned by the small yarn business near the proposed site.

Perhaps Maine has plenty of fresh water in it's aquifers but is flushing it through fish tanks and into the Bay the best use for it? Especially if in years to come that water might be needed for real farms or in other parts of the country?

From a recent Belfast Planning Board meeting on their financial capabilities NAF repeated several times how important the price of salmon is to their success. This proposed facility, as NAF have said, will be a high end product, and to be financially sustainable it must be big. There is no crystal ball to say what salmon prices will be in the future.

I am concerned that if the NAF facility is permitted to be built it will be obsolete by the time it is finished. I realize you all have a lot of reading and research to do but I urge you to do some research into other kinds of land based fish farming. Is there actually an immediate need to build this facility right now to feed future generations? Or perhaps Maine should be patient and picky over what types, if any, land based fish farms to sell it's water and land to. If Maine really wants to invest and support smaller local more environmentally sustainable aquaculture practices I see this huge facility perhaps damaging the future for those potential businesses by damaging the water and perhaps the market.

Your jobs are to protect the environment, you have a daunting task ahead of you.

Thank you for your time and careful consideration.

Erica Schlueter  
Belfast, ME

PS to clarify when I write that "I have heard" I have attended many of the NAF meetings and the Belfast Planning board meetings.