

Burke, Ruth A

From: Eileen Wolper <pebshep@gmail.com>
Sent: Tuesday, February 18, 2020 4:01 PM
To: DEP, Nordic Aqua Farms
Subject: BEP public comment

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Dear BEP,

My name is Eileen Wolper. I have lived in Belfast for 30 years, 28 of those years as an RN in our local Waldo County General Hospital. Every day of my commute took me along the Passagassawakeag River Estuary, whose beauty continues to delight me in tides, seasons, sunrises and full moons. I attended every day of the hearings last week.

I am asking You to deny permits to the euphemistic Nordic Aqua'farms' aka Massive Confined Fish Feed Lot and Slaughterhouse. I am asking for no exemptions (such as in their frequent 'permit first, then compliance with the application attitude), no leniency from this board for perceived economic benefit (it is a revenue gamble) and no lowering of standards. When it comes to standards, why wasn't an Environmental Impact Study performed? Isn't this something that should have been completed first thing? Without a baseline, how is compliance measured? RAS of this magnitude is new to Maine, with no standards yet in place. If there are no standards, there is no enforcement.

My concerns are many, but I will focus on Water. The site location for this proposed project is terrible!

I am suspicious that it did not meet any criteria "score" other than that of community water surplus supply (as long as a new Goose River well source is brought online using citizen dollars in the form of a bond). Most other site factors seem to be back-fitted to this one element. Their 'robust' multiple sources of fresh water cloud the fact that without the dammed reservoir water or its diminished on-site wells, this project will depend on the Belfast Water District. If they play the game of demanding more water to protect their profits, Belfast and Northport citizens resilience may be threatened. In its enormous quantity requirements, is this not the privatization of a large portion of our water supply?

I am concerned about 7.7 million gallons of effluent discharged into shallow water every day into Belfast Bay. I am even more concerned that flashy technology claims will replace water quality objectivity. "It is not possible to dilute something lower than it is in the ambient water" said a research scientist from the University of Maine, when discussing the role of Nitrogen in the Bay, and misleading claims by Nordic:
(<https://www.facebook.com/camdenpubliclibrary/videos/379216679299844/>), minute 37.4.

Nordic's claim that particle count will be lower than background levels or that effluent is "cleaner than the seawater going in" is twisting statistics to fit a profit driven narrative. Excess Nitrogen, to the tune of 1600 lbs a day, will reduce

water quality, can result in algal blooms, and even lead to eutrication, with fouling of shores and beaches, fish kills, and danger to surrounding aquaculture ventures. Even Nordic's minimal modeling shows waste lingering in the Bay for 14 days until its exit to the Penobscot Bay. Nordic presents lots of modeling, but site specific data collection validation is mighty scarce. Again, no site specific surveys, no multi-dimensional studies, no actual data collection, no field studies. It's as if tides, slack water, wind, depths and other complexities don't exist. Therefore, mystery remains. What are they afraid of finding?

This project is just too big, with potential damages being too permanent. Nordic Aqua'farm' is not a clean business. It is an industrial exploitation of precious natural resources, on a massive scale. And it is a potential polluter of our Belfast Bay. Thank you for consideration of my concerns.

Eileen Wolper

Belfast, Maine