



For a thriving New England

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November 15, 2018

VIA ELECTRONIC MAIL

Mr. Gregg Wood
Maine Department of Environmental Protection
17 State House Station
Augusta, ME 04333-0017
Gregg.wood@maine.gov

Dear Mr. Wood,

On behalf of Conservation Law Foundation, I write to support the application of Nordic Aquafarms for a National Pollutant Discharge Elimination System permit submitted to the Department on October 19, 2018.

Founded in 1966, the Conservation Law Foundation (“CLF”) is a member-supported environmental advocacy organization that works to solve the problems threatening our natural resources and communities in Maine and throughout New England. Among those issues, CLF has worked and continues to work to promote effective regulations and strategies to reduce and minimize the significant impacts of water pollution.

The concept of land-based aquaculture is a relatively untested one here in Maine but one that Nordic Aquafarms has a track record of successfully operating in Europe. CLF believes that land-based aquaculture holds particular promise in Maine. Not only does it avoid some of the issues that open water pen-based fish farms face such as escapes, deposition of waste and feed on ocean bottom, and conflicts with other marine resource users, but it also provides another opportunity to diversify our coastal-based economy.

Nordic’s NPDES permit principally seeks approval for the discharge of certain nutrients associated with its proposed land-based aquaculture facility in Belfast, ME. Specifically, Nordic’s discharge is projected to include total suspended solids (TSS), biological oxygen demand (BOD), nitrogen and phosphorous. TSS would be discharged at levels below background levels for the receiving waters of Penobscot Bay. The levels of BOD, nitrogen and phosphorous would be at levels exceeding background at the point of discharge but modeled to be below those background levels after dilution by surrounding water, as noted in comments submitted by the Gulf of Maine Resource Institute.

Having reviewed Nordic Aquafarm's permit application and met with the project team, CLF believes that the discharges of nutrients from the proposed facility should be permitted. We would urge the Department to consider establishing a sampling protocol beyond the point of discharge in order to ensure that the levels of BOD, nitrogen and phosphorous return to background levels as modeled. We would also urge the Department when it considers additional permits under the Site Location of Development Act and the Natural Resources Protection Act to ensure that the projected water withdrawals by Nordic Aquafarm will not adversely impact water quality or quantity.

Thank you for considering these comments and please don't hesitate to contact me should you have any questions.

Very truly yours,

A handwritten signature in blue ink that reads "Sean Mahoney". The signature is written in a cursive style with a large, sweeping initial "S".

Sean Mahoney
Director, CLF Maine