

Submitted 8/19 Public  
Hearing.

## TECHNICAL ABILITY

Good Evening, Planning Board Members and City Staff.

I am Ellie Daniels, and I currently reside in Searsmont. My wife, Donna Broderick, and I own property on the Perkins Rd. that abuts the site of the proposed project.

I would like to make comment on the Technical Ability of the applicant to develop the project in a manner consistent with state and local performance, environmental and technical standards. Nordic Aquafarms was founded in 2014. The Belfast project would be its fourth location. To date, it is a invested in Maximus, which is a brood stock facility, Sashimi Royal, which is a grow-out facility for Yellowtail Kingfish, producing just 1,200 MT per year, and Frederikstad, which recently introduced its first stock of salmon smolts.

When I consider the size of the proposal in front of you, to raise 33,000 metric tons at full build-out, I cannot consider the relative inexperience of this five-year-old company as sufficient to the challenges that may arise. While I can appreciate the detailed descriptions and theories behind the technical aspects of the project, I do not believe that a scaling up to such a degree as is proposed is simply a linear process, or a process that can have models applied to the scaling up that will prevent every unforeseen event. I am not alone in considering the risks far to great for our Bay and our aquifers.

I have read the resumes and credentials of the staff involved in the engineering and design of the plan, including those of the six hires from Inter Aqua Advance, a RAS design company that went bankrupt in 2018. None of the engineers whose resumes I saw have experience with RAS systems raising more than 5,000 MT/year. The dramatically scaled up facilities such as the one Nordic proposes for Belfast are an entirely new breed, and there is no real experience that can be cited.

I have read in the industry news about the challenges of acquiring insurance for these huge facilities, because the risks of an unforeseen event are so catastrophic and so costly that insurers are hesitant to back them.

There are many specific technical issues that should be addressed by people more knowledgeable than I. But I want you to be aware that there are fundamental challenges inherent in the infancy of the industry, the lack of direct experience among the operators, and the illusion of theoretical safeguards that do not constitute scientific or experiential proof.

Thank you.

Ellie Daniels  
Party-in-Interest Comment