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October 14, 2021

Nordic Aquafarms, Inc.

Attn: Ed Cotter

159 High Street

PO Box 283

Belfast, ME 04915

Re: August 24, 2021 Revised WRMP review by Belfast Planning Board

Dear Mr. Cotter:

The City of Belfast Planning Board, on October 20th, 2021, conducted a review of the revised Water Resource Management Plan (WRMP) dated Aug. 24, 2021. Review of the revised WRMP is part of the Nordic Aquafarms Significant Groundwater Well permit and conditions issued by the Board in December 2020.

After reviewing the revised WRMP for this project, the Belfast Planning Board has the following comments:

- 1) This updated WRMP provides for reasonable and thorough monitoring and evaluation of potential impacts from the project on groundwater, surface water and private wells near the project.
- 2) The Board asks that Nordic expand the table in Appendix C to identify which property owners have opted in or declined to participate in the monitoring program. It is important to note that private well owners who may choose to opt into the program after operations commence will be responsible to establish their own baseline data with documentation to support it.
- 3) The Board asks that Nordic incorporate the following table into the revised WRMP:

Section	Item	Role of MEDEP	Role of City
1.4	Final Alert & Action Criteria	Review & Approve	PB Review & Approve
2.2.4	Final River Stage/Discharge Calculation	Review & Approve	None
2.2.7	Qualitative Habitat Evaluation Index (QHEI)	Receive Submittal	None
2.3	Baseline Monitoring Data	Receive Submittal	P & C Receive Submittal

3.1	Private Well – Water quality impacts	Consult with	None
3.2	Wetland Impacts	Consult with	None
3.3	Stream Impacts	Consult with	None
3.4	Reservoir & Little River Minimum Flow	Notify	Notify P&C
3.5	Alert & Action Criteria Triggered	Notify	Notify P&C
3.6.1	Private Well Action Plan	Consult with	None
3.6.2	Lower Reservoir Action Plan	Consult with	None
3.6.3	Little River Action Plan	Consult with	None
4.2	Annual Report	Receive Submittal	P&C Receive Submittal
4.3	Monthly Reporting	Receive Submittal	P&C Receive Submittal
4.4	Private Week Data Report (Semi-annual)	None	P&C Receive Submittal
4.5	QHEI Surveys (Annual)	Receive Submittal	P&C Receive Submittal
4.6	In-Stream Flow Data (Semi-annual)	Receive Submittal	None
5.0	Changes to the Monitoring Program	Review & Approve	PB Review

- 4) The Board asks that Nordic incorporate provisions for significant or rapid fluctuations in Total Dynamic Head, if encountered in private wells, into the Final Warning and Action Criteria. Final Warning and Action Criteria must be reviewed and approved by the Planning Board before operations commence.
- 5) The Board asks that Nordic provide a table describing specific water quality parameters along with warning and action values for the Final Warning and Action Criteria submission for private wells.
- 6) The Board asks that Nordic provide the “normal high-water elevation” at Reservoir 1 on the Little River and how it compares to the crest elevation of the dam.
- 7) The Board asks that Nordic provide a table to describe allowable withdrawal rates based on water levels in Reservoir 1 on the Little River.
- 8) The Board asks that Nordic provide further explanation and specifics regarding flow rates on the Little River and when they would trigger warnings/actions.
- 9) The Board asks that Nordic propose an Action Level for Reservoir 1 on the Little River.
- 10) The Board asks that Nordic describe specific monitoring and warning/action levels for the Little River.

Please allow this letter to verify that the Belfast Planning Board has reviewed the revised Water Resource Management Plan submitted by Nordic Aquafarms on August 24th, 2021.

Please contact City staff at (207) 338-3370, extension 135, or by email at directorplanning@cityofbelfast.org, if you have any questions regarding this letter.

On behalf of the Belfast Planning Board,

Hugh Townsend, Chair

Date