

October 12, 2018
Via email

Mr. Gregg Wood, Wastewater Licensing
Maine Department of Environmental Protection
17 State House Station
Augusta, Maine 04333-0017

350 Commercial Street
Portland, ME 04101

tel (207) 772-2321
fax (207) 772-6855
www.gmri.org

Dear Mr. Wood:

I'm writing to share our perspective of the marine ecosystem considerations and economic development considerations related to Nordic Aquafarms' proposed RAS salmon production facility and offer our support as the Belfast community considers this proposal.

The Gulf of Maine Research Institute (GMRI) is an independent, non-profit marine research organization located in Portland. Our mission is to pioneer collaborative solutions to global ocean challenges. We're focused on the waters and fisheries of the Gulf of Maine and Bay of Fundy, reaching out the edge of the Continental Shelf on Georges Bank. We're deeply involved in marine research, education, and community development coastwise from Yarmouth, N.S. to Point Judith, R.I. Maine is home, and our deepest commitments are here. We take an interdisciplinary, ecosystem approach to understand and address challenges and opportunities related to marine stewardship and coastal community economic development.

Five years ago, we looked closely at the challenge of how Maine might diversify our coastal economy that is over-dependent on one species (lobster) as our economic mainstay. We concluded that responsible aquaculture is the logical complement to our traditional fishing economy. Thus we're dedicated to supporting the growth of responsible algae, shellfish, and finfish production.

Maine is blessed with numerous competitive advantages on which to build a successful aquaculture industry. Our fresh and saltwater is clean and cold. We have a deep heritage of fishery skill and experience. We have an extraordinary network of marine research institutions to support the evolution of aquaculture here. The Maine brand is highly respected. We're located close to major metropolitan markets. We're known nationwide as the nation's best-practice state due to the Maine Department of Marine Resources' comprehensive management of aquaculture, the Maine Department of Environmental Protection's comprehensive and delegated management of discharges, and the Maine Aquaculture Association's leadership in developing best practices.

Given our interest in aquaculture as a 21st century seafood opportunity and the carrying capacity of coastal waters, we've been supporting strategies of

Visionary Donor
William G. Waldron
(1936-2001)

Officers:
Chair
Charles E. Miller, Esq.

Vice Chair
Frank J. Governali

Treasurer
Robin A. Sawyer

Secretary
Michael L. Meyers

President
Donald W. Perkins

Directors:
Frank Blair
Julia Brady
Joshua B. Broder
Corson Ellis
Shawn O. Gorman
Frank J. Governali
Jean Gulliver
David T. Lawrence
Joshua Madore
R. Scott Mahoney, Esq.
Mark Messier
Michael L. Meyers
Charles E. Miller, Esq.
Penny Noyce, M.D.
Katherine S. Pope, M.D.
Robin A. Sawyer
Beth Shissler
Frank Simon II

responsible diversification from owner/operator lobstering into owner/operator algae and shellfish farming, modest expansion in sea pen salmon-farming Downeast, and breakthrough attraction and development of on-land finfish RAS (Recirculating Aquaculture System) production between Harpswell and Cutler.

As an independent research organization with aquaculture expertise, we've been requested to assist in assessing the opportunities and risks of the two salmon RAS projects under consideration in Belfast and Bucksport. Given the current discussion about the Nordic Aquafarms proposal in Belfast, I asked them to share their draft MEPDES permit for our review. I'm writing to share the following observations:

- Nordic Aquafarms (Nordic) has developed a thoughtfully engineered RAS production facility. They've drawn on Norwegian know-how and technology, Maine-based environmental engineering expertise, and Maine-based construction expertise to do so.
- Nordic has assembled an outstanding site and related easements with neighbors to build a safe, contained facility, provide it with adequate groundwater and seawater inputs, and convey process waters underground to avoid shoreline impact and discharged offshore at suitable depth and with appropriate distribution.
- The nutrient and temperature impact of facility discharge, as modeled, will have negligible impact when considered in the context of the tidal current and water volume characteristics of West Penobscot Bay and Belfast Bay. Nordic has sought second opinions to insure development of a best-practice design to minimize discharge impacts.
- Nordic has developed a competent strategy to collect baseline ecosystem information against which to monitor impact from operations as they grow and evolve.
- Nordic has gone beyond addressing normal discharge permit environmental engineering requirements to observe that the ultimate risk and determinant of ecosystem impact will be operating practices. They're coupling Norwegian operational expertise and experience with hiring capable, local facility managers with a long-term commitment to Maine. This combination is the best insurance we could ask for against operational risk.

Given the substance and spirit with which Nordic Aquafarms has designed their proposed facility, secured the resources to build it, and addressed environmental considerations, we believe they offer Maine an extraordinary opportunity of a significant capital investment and a leadership role in the evolution of a responsible 21st century seafood economy.

If we can assist in any way as you consider the Nordic Aquafarms proposal, please contact me.

Sincerely,



Donald W. Perkins
President/CEO

cc: Ms. Samantha Paradis, Mayor & Mr. Joseph Slocum, City Manager