

STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BOARD OF ENVIRONMENTAL PROTECTION

IN RE: APPLICATION OF NORDIC AQUAFARMS, INC.
MEPDES Permit # ME0002771
City of Belfast, Waldo County

UPSTREAM WATCH
REQUEST THAT BOARD
OF ENVIRONMENTAL
PROTECTION ASSUME
JURISDICTION

Upstream Watch, a not-for-profit corporation situate in the City of Belfast, Maine respectfully requests the Environmental Protection Board take jurisdiction of the MEPDES application of Nordic Aquafarms, Inc. and as reasons therefor, asserts the following.

1. An award of this permit will have a direct, indirect, and cumulative environmental or economic impact in the City of Belfast, Maine, the Town of Northport, Maine, the Town of Islesboro, Maine and the Town of Lincolnville, Maine, at a minimum. An award of this permit will also have a direct, indirect, cumulative and possibly irreparable adverse impact on the lobster and crab grounds used by hundreds of lobstermen in Zones C and D in Penobscot Bay, and on the reputation for wholesomeness of all Maine lobsters, especially those caught in and near Penobscot Bay.
2. The process waste pollution that Nordic proposes to discharge from the pipe for which it seeks a permit will soil the water and the beaches of the four above municipalities, interfering with the quiet enjoyment of waterfront properties, swimming, and boating. In addition, the waters off those four towns support the lobster and crab fisheries in Zones C and D, a recovering scallop fishery, the mussel industry (Including a thriving aquaculture business that produces mussels in the area directly adjacent to

the proposed waste discharge) and Waldo County generally, and tourism, and thus an award of this permit to Nordic will cause a severe adverse economic impact on economic activity occurring in those towns.

3. The permit would license an activity not heretofore permitted or licensed in Maine. A license to discharge 7.7 million gallons of process waste per day into Penobscot Bay, displacing lobstermen, mussel farmers, and recreational users of the Bay is, mercifully, unprecedented. But it would set the precedent of allowing Penobscot Bay, and potentially other waters in the Gulf of Maine, to be used as dumps, or repositories of industrial waste. As America has matured as a society such behavior has become universally abhorrent.
4. This permit application is likely to come under significant public scrutiny. It already has. Three opposition groups are active, armed with experts to challenge this application. Newspapers have been full of stories about the project, although, on information and belief, some newspapers under common ownership, are now refusing to receive any negative material about the project. [ADD CITATION].
5. The project is located in more than one municipality. The offending discharge pipe, from which the discharge is proposed, is located at or near the southern bound of Belfast, Maine and adjacent to the northern bound of Northport, Maine. The discharge will likely start in Belfast but will quickly and inevitably travel to Northport and Islesboro. As the pollution spreads, it may reach the Town of Lincolnville, as well as the Towns of Searsport and Stockton Springs. The extent of impacts throughout Penobscot Bay and the upper estuary caused by discharging this volume of effluent and waste water into the upper Penobscot Bay, in an area of complex currents will be vast and is not yet fully understood.

FOR THE FORGOING REASONS, Upstream Watch respectfully requests that the Environmental Protection Board assume jurisdiction of the application of Nordic Aquafarms, Inc.

Dated this _____ day of November 2018.

Respectfully submitted,

On Behalf of UPSTREAM WATCH

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