

Wood, Gregg

From: Deborah Capwell <deborahflora@gmail.com>
Sent: Saturday, October 27, 2018 3:08 PM
To: Wood, Gregg
Subject: [EXTERNAL SENDER] Concerns re: the Whole Oceans discharge permit application

Dear Mr. Wood,

I am writing to you because I have concerns and questions regarding the Bucksport Whole Ocean discharge permit. I am especially concerned about the effect on the wild salmon run in the river and the cumulative effect on the bay along with the proposed Nordic Aqua Farms facility

Many people depend on the Bay for their livelihood: people employed in the tourism and fishing industries as well as smaller businesses- shellfish farms, people employed restoring coastal areas to name a couple. With significant new effluent, as well as water with varying salinity and temperatures being flushed into the Bay, it will surely be affected. Is it really possible to ascertain how and to what degree? Will the reduction in water quality be enough to trigger lowering the water quality rating? Will the outflow go up the river with the tide?

I wondered if the increase in pollutants will really "result in important social and economic benefits to the state"? For whom? Have the Native American tribes living on the Penobscot River been asked about this? I know little about them, but if they fish in the river, they would surely be concerned about the Whole Ocean project. Has anyone looked into how the discharge from the project will affect wild fish runs?

Even though I am not trained to read these kind of applications, I attempted to do my best with the Whole Ocean Permit. I compared some of the numbers in this permit with the one that NAF submitted recently. For instance:

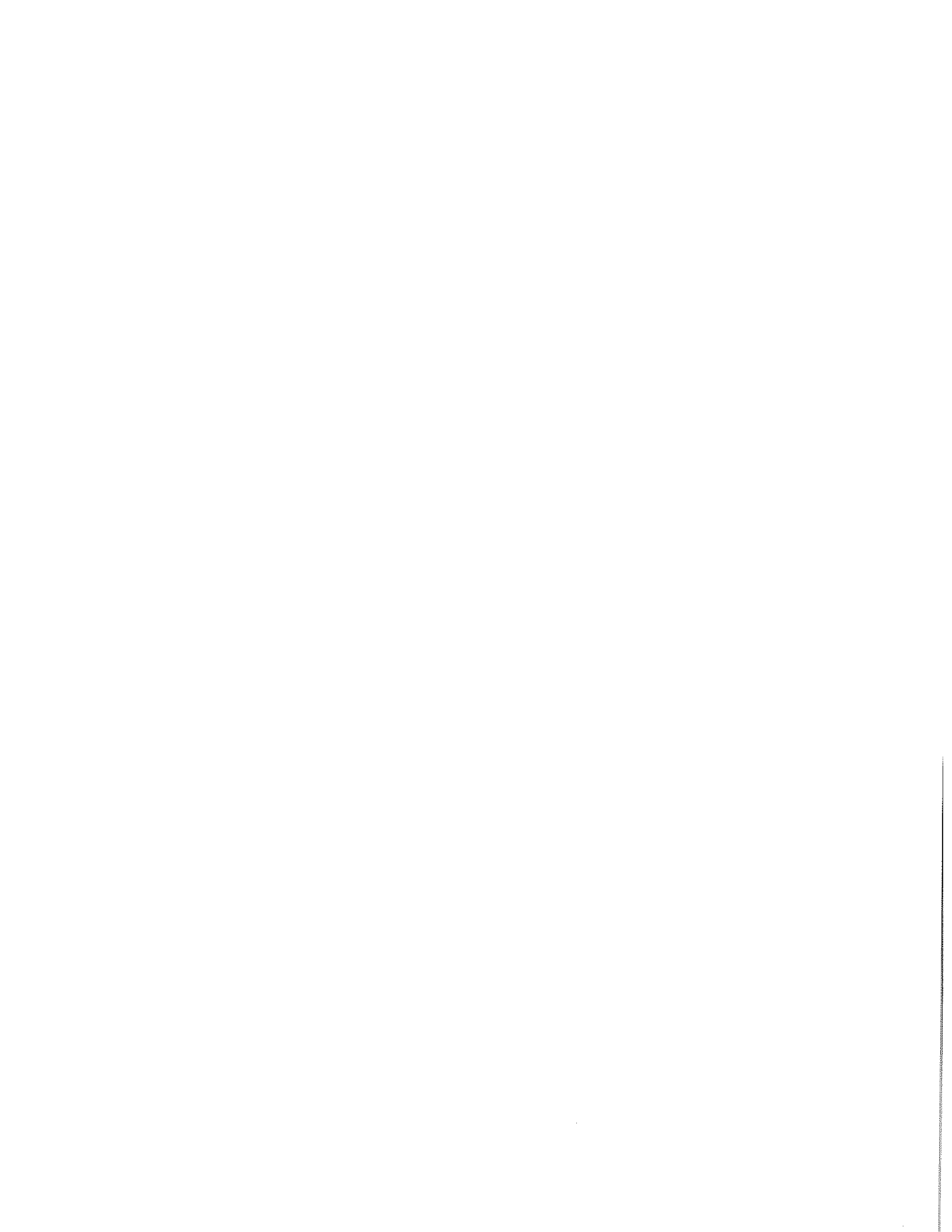
- Whole Oceans is planning to process **11,023,100 lbs.** of fish/year.
- Nordic is saying it wants to process **66 million**- about 6 times as much.
- Whole Oceans says it's discharge will be **4 million gallons/day**- 3 million salt and 1 million fresh.
- Nordic says its will be **7.7 million gallons/day**

Nordic's estimate isn't even twice as much as Whole Oceans, let alone 6 times as much. Why aren't these numbers proportional to the amount of fish the two facilities are proposing to process?

-Whole Oceans estimates **9,200** gallons/day daily effluent flow.

-Nordic estimates **96,000- 115,000** gallons.

Here, the imbalance is in the other direction. Nordic estimates more than 10 times the Whole Ocean projected effluent flow. Why is this?



And then of course, there's the issue of fish food. Whole Oceans hasn't said what they are planning to feed the fish. If we don't know that, how can we know what kind of impact the fish feces and uneaten food will have on the whole operation?

Also, what about "sanitary waste"? Can the Bucksport municipal system handle such a significant increase (around 10,000 gallons/day)? If not (even if temporarily), what is the backup plan?

These are just a few of the concerns I have. I really wonder if this plan is worth the risks involved. Might it not be better for us all to concentrate on supporting the natural recovery of the Bay?

Thank you so much for taking the time to consider my concerns.

Sincerely,

Deborah Capwell

Belfast