

Wood, Gregg

From: Don Perkins <don@gmri.org>
Sent: Monday, October 29, 2018 5:01 PM
To: Wood, Gregg
Subject: [EXTERNAL SENDER] Whole Oceans MPDES and WDL comments

Dear Mr. Wood:

I'm writing to share our view of the marine ecosystem impact and economic development considerations of the Whole Oceans' proposed RAS salmon facility in Bucksport in light of your draft Maine Pollutant Discharge Elimination System (MEPDES) permit and Maine Waste Discharge License (WDL).

Five years ago, we looked closely at the challenge of how Maine might diversify away from its risky dependence on lobstering as the economic mainstay of our fishing communities. We concluded that responsible aquaculture is the logical complement to our traditional fishing economy. As a result, we're 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 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 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.

Given the Whole Oceans draft MEPDES Permit and Waste Discharge License open for public comment, I'm writing to share the following observations:

- Whole Oceans has developed a highly-engineered RAS production facility. They've drawn on European know-how and technology and Maine-based marine construction expertise to do so.
- They have chosen a community and prior industrial site to build a safe, contained facility with limited environmental impact.
- They have engineered their facility such that individual salmon escape risk is minimized with redundant barriers and overboard discharge does not diminish water quality against current state water quality classifications.
- They have committed to a competent strategy to monitor impact from operations as they grow and evolve, including a dye study to assess local water quality impact after their first phase is operational.
- They have hired competent operational management and committed to best-practice operational management approaches and training.

- Given the approach that Whole Oceans has taken to each step of their business development over the past three years, including their proposed approach to managing environmental risks, we believe they offer Maine a breakthrough opportunity of a significant capital investment and a leadership role in the evolution of a responsible 21st century seafood economy.

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

Sincerely,

Donald W. Perkins
President/CEO

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