

Atlantic Salmon Federation



Fédération du Saumon Atlantique

October 29, 2018

Gregg Wood
Maine Department of Environmental Protection
Division of Water Quality Management Bureau of Water Quality
17 State House Station
Augusta, ME 04333-0017

RE: Maine Pollutant Discharge Elimination System (MEPDES) Permit #ME0037478 Maine Waste Discharge License (WDL) #W009190-6F-A-N

Dear Mr. Wood:

I am writing on behalf of the Atlantic Salmon Federation (ASF) in support of Whole Oceans, LLC Maine Pollutant Discharge Elimination System Permit associated with their land-based recirculating aquaculture system (RAS) facility in Bucksport, Maine. We believe the proposed activities and effluent discharges will not have an adverse effect on the Penobscot River and are protective of wild salmon populations.

ASF has partnered with the Conservation Fund's Freshwater Institute on a series of grow out trials and subsequent workshops around the developing technology of land-based RAS. Our experience has demonstrated that this can be an environmentally sustainable industry and that the by-products of salmon production can be greatly reduced, including all solids along with the majority of phosphorous and nitrogen. This area of the lower river is also heavily influenced by both freshwater, saltwater and tides that will serve to readily dilute effluents to background ambient levels.

We are very supportive of the proposed monitoring requirements proposed in the permit. These include a dye study to further identify the mixing characteristics of the effluent, and an ambient water quality monitoring study in selected locations near the facility. We are also supportive of the required Operations and Maintenance Plan and the required Containment Management System (CMS) intended to prevent the possibility of any live fish escaping into the river. ASF was part of a small group that developed the current CMS for the coastal net pens in the early 2000s, which quickly eliminated the history of escapes from the net pens. Though the potential for escaped fish from the facility in the river is very remote, we recommend the mandatory reporting of any escape as opposed to the current threshold of 50 fish escaping to trigger a notification event.

Sincerely,

A handwritten signature in black ink, appearing to read 'Andrew Goode', written in a cursive style.

Andrew Goode
Vice President, US Programs
Atlantic Salmon Federation

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