



NORDIC AQUAFARMS: THE DEVIL IS IN THE DETAILS

ELLIE DANIELS, BOARD OF DIRECTORS

THE FRIENDS OF HARRIET L. HARTLEY CONSERVATION AREA

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WHAT IS THE FRIENDS OF HARRIET L. HARTLEY CONSERVATION AREA?

- The Friends of Harriet L. Hartley Conservation Area was formed in the Fall of 2019 to safeguard the coastal and intertidal land at the mouth of the Little River in Belfast and Northport, Maine, from industrial development, consistent with the deeded wishes of Dr. Harriet L. Hartley.
- Our long-range vision is to lead efforts to reclaim, restore, and conserve environmentally critical coastal and intertidal land around Penobscot Bay.
- Our immediate goal is to defend the federally registered Conservation Area against unlawful taking and development.
- We are a 501 c-3 Member Organization.

NORDIC AQUAFARMS COMES TO THE CITY OF BELFAST



On February 1, 2018, Governor Paul LePage, accompanied by City officials and representatives of Maine and Company, announced a proposal to build one of the largest land-based CAFFs (Concentrated Aquatic Animal Feeding Facility) in the world on 56 acres primarily owned by the Belfast Water District.

NORDIC AQUAFARMS ASSURED THE COMMUNITY IT WANTED TO WORK TOGETHER

But agreements had already been made:

- The Water District promised to petition the PUC to waive an eight-month Public Comment period on the proposal.

The request was sent on March 30 and the waiver was granted by the PUC.

- The City promised to fast track a Zoning Change of the property, from Residential 2 to Industrial.

In April, following a public hearing that included 52 testifiers in opposition and 2 in favor of the zoning change, the City Council voted 5-0 in favor.



NORDIC PROMISED INCREASED TAX REVENUES AND JOBS, BUT DETAILS...



- However, in 2019, City Manager, Joe Slocum, reported in the Republican Journal that tax relief from the Nordic Aquafarms project would be minimal.
- The Pine Tree Development Zone Program, as well as other programs, incentivize corporations like Nordic to locate in Maine by reducing or eliminating taxes.
- First, we heard 30 jobs, then 50, then 100, even 150.
- Colleges and Universities are scaling up aquaculture programs but are still years out from graduates.
- Much of Maine is suffering from a noticeable shortage of available employees, due to COVID-19 layoffs and the ongoing gap between wages and affordable housing.

NORDIC DESCRIBED AN “RAS” SYSTEM THAT WOULD RETURN WATER TO THE BAY CLEANER THAN IT WAS BEFORE

Erik Heim suggested he would even drink a glass of it, to show us.

He also compared the amount of water discharged into Belfast Bay as “a penny thrown into the ocean.”



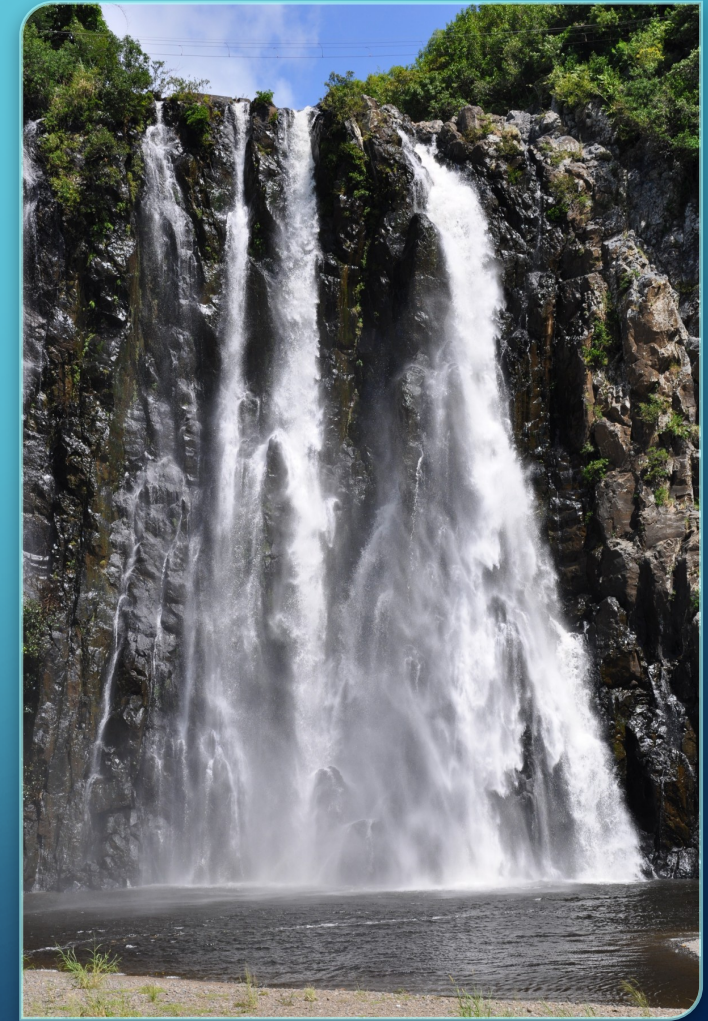
WHAT IS RAS (RECIRCULATING AQUACULTURE SYSTEM)?

- “Recirculating Aquaculture Systems are used in fish production where **water exchange is limited** and the use of biofiltration is required to reduce ammonia toxicity. Other types of filtration and environmental control are often also necessary to maintain clean water and provide a suitable habitat for fish. The main benefit of RAS is **the ability to reduce the need for fresh, clean water** while still maintaining a healthy environment for fish.”



WATER DETAILS: 1.7M GALLONS FRESH WATER AND 5-6M GALLONS SALT WATER , EVERY DAY

- 1205 GPM (1.7 million gallons/day) of fresh water from deep water wells, the Belfast Water District, and surface water from the lower Little River Reservoir, totaling more than 630 million gallons/year. (As much water as extracted two of the largest Maine Nestle operations combined)
- Three test wells on the property returned disappointing results, including low-flow, saline intrusion and draw-down of neighboring wells being monitored.
- In order to supply and pipe more water to the facility, the Belfast Water District reports needing to bring the Jackson Pit well online and upgrade infrastructure capacity at a cost of \$1.4M.
- The 2018 hydro-engineering study required of the BWD by the PUC identifies the hospital and “certain industries” as potentially higher water priorities than residences.
- The final plan for sources of fresh water is not yet settled.



UP TO 7.7M GALLONS WATER OUT, EVERY DAY (IS THIS AN RAS, OR A FLOW-THROUGH SYSTEM?)

- Up to 7.7 million gallons of discharge daily into the Bay. 99% of solids filtered out, with no plan for disposal at this time.
- Effluent contains 1500 lbs/day of soluble nitrogen, (12-16 times more than the Belfast Wastewater Treatment Plant) 6-8 lbs of phosphorous, and 380 lbs of remaining suspended solids.
- Outfall dispersal studies predict a warm, continuous plume of over 100 million gallons requiring 10 or more days to reach deep water currents South of Rockland.



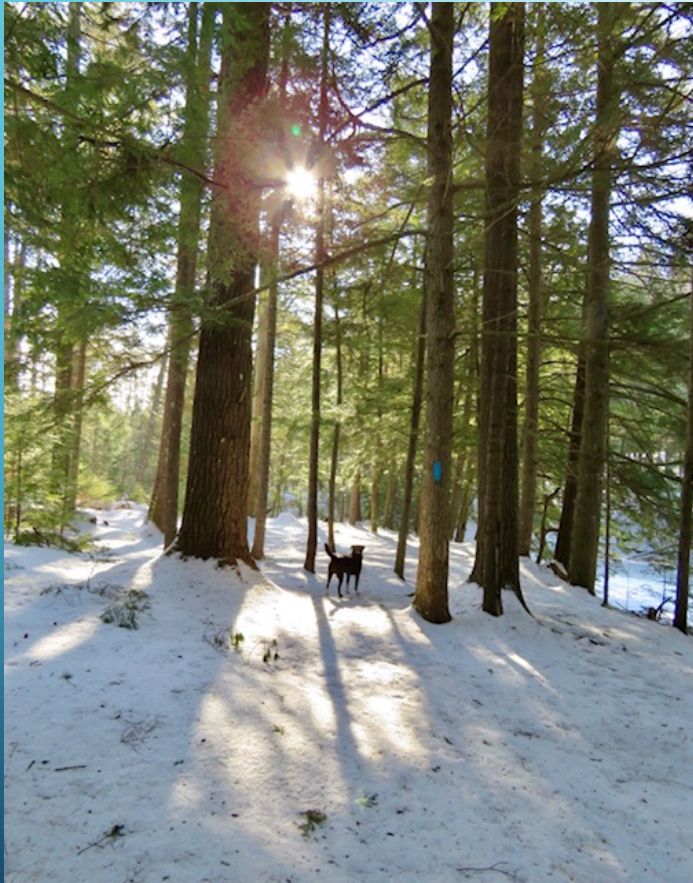
?algal blooms and dead zones?

CRITICAL DETAIL: A STAFF MEMO REVEALS AN ISSUE DURING CONSIDERATION OF THE **MEPDES** PERMIT



- Nordic Aquafarms is notified in a private memo (not shared with Interveners) that the nitrogen levels of the proposed effluent exceed the allowable limits for far-field dilution.
- Nordic responds to say they have made a “mistake” in the calculation of the far-field and have now “corrected” it.
- The new nitrogen calculation comes in just lower than the allowable amount.

NORDIC SAYS IT IS DEVELOPING SUSTAINABLY, BUT IT REQUIRES THE DESTRUCTION OF 56 ACRES OF GREEN HABITAT. HERE ARE THE DETAILS.



- Clearcut of a mature forest, 1150 cords of carbon-sequestering wood
- Excavation of soil of the entire building site to a depth of 8-20', 1.1 million cubic feet of soil
- Complete disruption of wildlife, including otters, beavers, and threatened birds and bats
- Encroachment on the beloved Little River Trail
- Loss of a contiguous greenbelt of nature trail and habitat from the ocean into the City of Belfast

NORDIC SAYS IT WILL HAVE A LOW CARBON FOOTPRINT

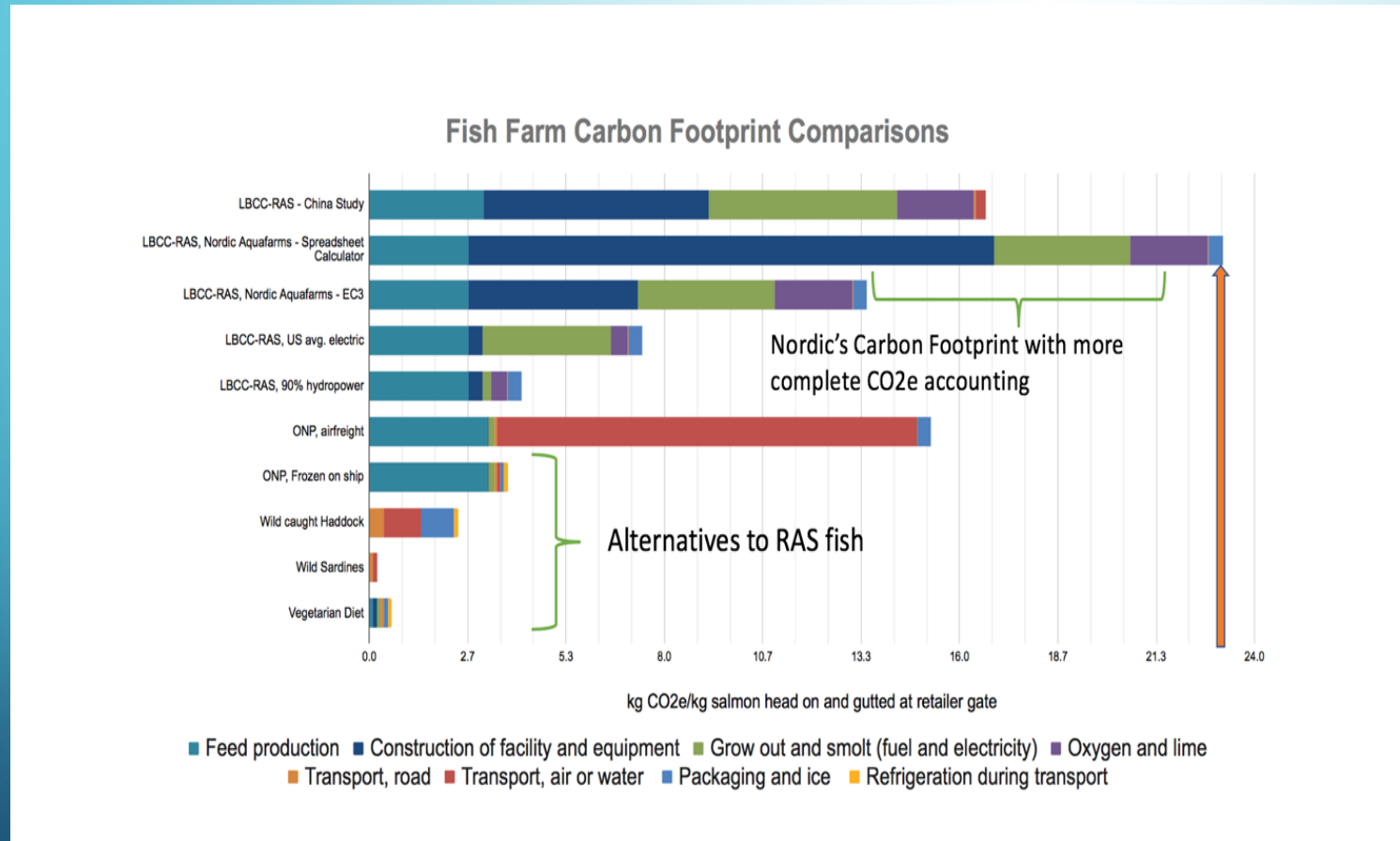
- Nordic focuses on proximity to the markets in Boston and New York, and the ability to transport its product by truck. (But what about traffic and road impacts on Route 1 and 3?)
- Nordic originally talked about solar panels, Tesla trucks, heat exchangers, electricity from methane, sod roofs, and other details that haven't re-emerged since early presentations.
- Sources and production of fish feed has a huge carbon footprint, up to 20% of total impact, but since Nordic has not yet identified its source and composition of fish feed, it is excluded in the calculation.



BUT A RECENT IN-DEPTH STUDY DELVES INTO THE DETAILS

Findings:

- Nordic would add between 550,000 and 759,000 metric tons of carbon dioxide equivalents (CO₂e) to the atmosphere each year.
- Nordic represents 4.6 – 6.4 percent of Maine’s 2030 GHG target.
- And between 12.8 and 17.6 percent of Maine’s 2050 target.
 - Equivalent to adding 120,000 to 165,000 cars to the roads.
- Equivalent to an adding 14,000 to 18,000 households.
- Would increase Belfast’s carbon footprint 5 to 7 times.



Selected Data: Carbon Emissions of Proposed Nordic Aquafarms Facility: 2/10/2020

Prepared by: James Merkel and George Aguiar

Full background information and sources are in written DEP submission “Carbon Paper”

Link: [Carbon Paper](#)

THIS PICTURE, THE MOST WIDELY USED DEPICTION OF THE PROJECT, HAS NOTHING TO DO WITH THE CURRENT PROPOSED DESIGN



- Nordic proposes eight 2 mega-watt diesel generators which will burn 900,000 gallons of diesel each year. (No plan has been submitted for fuel storage.)
- The generators will require eight 70'+ “chimneys”, called such because they would not meet Belfast Planning Board approval if they were call “smokestacks”.
- Nordic’s permit classifies the facility as a “minor source-point” emitter, based on the generators operating 6 hours/week primarily for “peak-shaving” purposes.
- If Nordic’s power plant were to run continuously, such as during a prolonged outage, it would be the second largest onsite industrial electric plant in New England.

IN FACT, A \$63M CMP UPGRADE MAY BE NECESSARY TO MEET NORDIC'S ELECTRICITY NEEDS



“The amount of electricity the salmon farm would draw remains to be seen.

In **November 2019** Nordic requested infrastructure to support 21 megawatts. Nordic has since increased the amount, which Stinneford said is confidential but “in the range of 20-30MW.”

“It’s a large single-load addition, by any measure,” he said. “About the only places where we have customer loads of that magnitude are large industrial facilities, like paper mills, or the [Bath Iron Works] shipyard. It’s certainly more than a large commercial or institutional building like a hospital or warehouse facility.”

Ed Cotter, senior vice president of projects at **Nordic Aquafarms**, on December 7 confirmed that the facility will need electrical capacity “somewhat higher than 21MW in order for NAF to complete the development and maintain compliance with the state permitting conditions that have been established while maintaining appropriate buffers for extreme weather events.” The cost or extent of any local electrical infrastructure that would be built by CMP for Nordic is still under negotiation, he said.”

[Nordic Aquafarms Connected to Proposed \\$63M CMP Upgrade - Free Press Online](#)

THE VISUAL DETAILS: NORDIC AQUAFARMS IS A GIGANTIC INDUSTRIAL DEVELOPMENT



- 807,254 sq.ft
- 14 Football Fields
- Large enough to fit Gillette Stadium, Fenway Park, and two TD Gardens

PROPERTY RIGHTS ARE THREATENED

- Nordic proposes a pipe route to the ocean over intertidal property that is privately owned and federally registered as Friends of the Harriet L. Hartley Conservation Area.
- Placing the pipe would involve blasting and extensive dredging/dewatering in an area known to contain buried mercury.
- The Town of Searsport would receive barge-loads of dredge waste but has never been notified nor authorized this use of the Mack Point facility.
- Nordic has yet to receive a permit from the Bureau of Parks and Lands, awaiting judgement of Title, Right, and Interest in Maine Superior Court. The trial is scheduled for the end of June.



POLITICAL PRESSURE ON DEP TWISTED NORDIC'S PERMIT PROCESS

“DOCUMENTS IN A LONG-DELAYED FOAA REQUEST SHOW A TROUBLING LEVEL OF INTERFERENCE AND BIAS IN NORDIC'S PERMIT PROCESS.” – KIM ERVIN TUCKER

- [BELFAST, MAINE – Monday, March 15, 2021] – Documents delivered to the Friends of Harriet L. Hartley (HLH) last month show DEP officials were pressured to drop a January 2019 demand that Nordic Aquafarms (NAF) submit more proof of the company's right to lay pipelines through a disputed intertidal zone. A key player in the campaign was Peter Mills, Esq., brother of Gov. Janet Mills. Attorney Mills, along with Maine & Co. CEO Peter DelGreco warned the Governor that Nordic's project was in jeopardy and a January 22, 2019 demand from Maine DEP for solid proof of the company's “right, title, or interest” (TRI) in the intertidal area needed to go away. Eight days later, on January 30, the fix was in. DEP retracted its demand; sent Nordic's permits to the Board of Environmental Protection (BEP); and never raised the TRI issue again.
- What happened between January 22 and January 30?
- Documents in the February 2021 FOAA deliveries to DEP Intervenor Lawrence Reichard provide answers. The chronology of events revealed by those documents strongly suggests that a behind-the-scenes campaign to quash the DEP Jan. 22nd demand resulted in the Jan. 30th decision to do just that.

- This pattern of covert support for NAF's permits prompted attorneys for HLH and the other petitioners in the Waldo County Superior Court case against Nordic to file a new motion earlier today. [Copy attached.] In it, attorney Kim Ervin Tucker asks the Court to re-open the discovery process. "Petitioners assert that documents within the Reichard FOAA Response indicate that officials at the highest levels of the Mills' Administration, including Gov. Mills, have indulged solicitations from well-connected lobbyists, powerbrokers, and influence peddlers – including the Governor's brother Peter Mills – to put a thumb on the scale of the NAF permitting process..."
- "Because the documents that DEP previously withheld from Petitioners' indicated the existence of improper motivations underlying actions by officials..." Tucker argues, reopening the discovery process is justified. NAF opponents had no knowledge that Governor Janet Mills' brother, Peter Mills, Esq., or Peter DelGreco and the Maine & Co., were surreptitiously involved in promoting the NAF project and challenging decisions made by career DEP professional staff relating to NAF's lack of TRI as well as other issues.
- "Discovery is needed," Tucker says, "to determine the extent to which this influence by Reid and Loyzim constrained the information considered by the BEP and tainted the BEP adjudicatory proceedings." "In particular," she points out, "discovery is needed to determine the extent to which political pressure influenced the DEP and BEP determinations that NAF had demonstrated 'sufficient' TRI..."

DETAILS ABOUT NEW DEVELOPMENTS

In April, 2021, Governor Mills introduced “Emergency Legislation” that proposes to exempt land-based aquaculture projects from having to meet the Maine Uniform Building and Energy Code requirements.

“Sec. 10 MRSA §9722, sub-§6, ¶B-1, as enacted by PL 2019, c. 391, §4, is 13 amended by amending subparagraph (4) to read: 14 (4) **That buildings used to house livestock or harvested crops or land-based aquaculture facilities are not subject to the Maine Uniform Building and Energy Code.**

For purposes of this subparagraph, “land-based aquaculture facilities” 17 means facilities that are not located in the coastal waters of the State but are located 18 in the State and are used for aquaculture of marine or freshwater organisms;”



THANK YOU FOR THIS OPPORTUNITY

- Questions or Comments?
- Feel free to contact me
for more information:

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