



Mr. Jay Clement
Senior Project Manager and Team Leader
Maine Project Office
U.S. Army Corps of Engineers
442 Civic Center Drive, Suite 350
Augusta, ME 04333

In re: Salmon aquaculture lease proposal in Frenchman Bay

May 17, 2021

Dear Mr. Clement:

The undersigned sixteen organizations and businesses care deeply about the health of Frenchman Bay, the livelihoods of small-scale harvesters from surrounding communities that depend upon the Bay, and the well-being and enjoyment of all who share our deep appreciation of this exceptional place. We have been monitoring closely the evolution of American Aquafarms' (AA) lease application for a large salmon aquaculture project in Frenchman Bay since it was first proposed last October. The proposal is generating a significant amount of controversy across a broad spectrum of stakeholders who live and work around the Bay.

Our understanding is the large size and unproven technology of the proposed industrial scale farm are without precedent in the world's commercial fisheries. Significant environmental, economic, and governance issues are being raised about the proposed project that have not been vetted previously by the state and federal regulators mandated to review and approve the required permit applications.

Examples of some significant areas of concern and related unanswered questions include, but are not limited to:

Unprecedented Scale —The proposal seeks to lease two 60-acre sites in Frenchman Bay to house 30 deep-water semi-closed pens with the capacity to produce 66 million pounds of salmon per year. To put this amount in perspective, the National Oceanic and Atmospheric Administration reported the total annual U.S. production of Atlantic salmon was 35.7 million pounds in 2016 (the most recent year for which data is available). The operation is expected to produce an exceptionally large volume of solid waste and effluent in a harsh environment that will pose significant challenges to prevent polluting spills. A Pew Oceans Commission study estimates an industrial ocean fish farm operation of 200,000 salmon can produce nitrogen equivalent to the untreated sewage of nearly 20,000 people, phosphorus equivalent to nearly 27,000 people, and fecal matter equivalent to nearly 63,000 people—each of AA's 30 pens could contain up to 220,000 10-pound salmon. For one of its two proposed sites in Frenchman Bay, AA is requesting an effluent discharge permit for 90 cubic meters per second—this flow is equivalent to the volume of more than two Olympic-size swimming pools every minute.

Unproven Technology —The use of deep-water semi-closed pen technology has never been deployed at a scale approaching that proposed for Frenchman Bay. The semi-closed pens allow the daily discharge of billions of gallons of rinse water containing nitrogen, phosphates, and other dissolved chemicals. Consequently, there are numerous unanswered questions about fish escape rates, disease and virus incidence, dissolved

contaminants, veterinary pharmaceuticals, residual uncaptured solid waste, antibiotic leakage, and longer-term uncharacterized impacts on the Bay's floor.

Economic Impact on Local Wild Fisheries—Place-based, ecologically sustainable wild fisheries such as lobster, scallop, oysters, wild harvest and farmed seaweed, northern shrimp, and groundfish are robust economic drivers for the greater Frenchman Bay region. Since before the arrival of the first European settlers in coastal Maine, local fisheries have been integral to the social fabric of the region. Any development proposed for the Bay must be compatible with Frenchman Bay's wild fisheries and local harvesters. Were environmental degradation to cause American Aquafarms to abandon its Frenchman Bay operations, local place-based fisheries businesses would not have a similar option to relocate.

Ecological and Visual Impact on Acadia National Park and Other Conserved Land—Serious concerns exist about adverse impacts to Acadia National Park and the resources it has protected and enhanced for more than a century. As one of the most popular, accessible, and frequently visited National Parks, Acadia is a vital source of primary and secondary employment around the Bay that the region cannot afford to have jeopardized. Potential industrialization of the Bay and associated adverse visual, noise and lighting Impacts on the Park and other conserved lands in the area (e.g. Bean, Dram, Ironbound, Jordan, Preble and Stave Islands) could significantly degrade both visitor experience and the surrounding wildlife habitat.

Climate Change Impact—The proposed activity raises significant issues that warrant vetting related to the causes and effects of climate change in the region. For example, the temperature of the Gulf of Maine is believed to be increasing faster than the world's other large bodies of water. As Frenchman Bay continues to warm, the longer-term implications for the economic and environmental viability of the AA project should be carefully considered. Another climate change issue raised by the proposed salmon farm is its potential carbon footprint. The operation will require onshore and offshore transport of enormous volumes of fish, fish food, diesel fuel, sludge, and other materials by truck, ship, and ultimately aircraft. It will require pumping of enormous volumes of water powered by generators at the lease sites. The resultant discharge of CO2 and particulate matter pose potentially serious climate impacts and reductions to air quality.

We believe the potential adverse economic and ecological consequences of the proposed salmon farm are extensive and necessitate a comprehensive study of the impacts. **We request, therefore, that an Environmental Impact Statement pursuant to the National Environmental Policy Act be required prior to the rendering of any final decision on the American Aquafarms permit applications.**

We will continue to pay close attention to the proposed development, and we encourage strong public participation in this important issue through a robust, science and data-driven, open and comprehensive review process.

Respectfully,

Land Trusts & Conservation Organizations:

Frenchman Bay Conservancy
www.frenchmanbay.org

Crabtree Neck Land Trust
www.crabtreenecklandtrust.org

Downeast Salmon Federation
www.mainesalmonrivers.org

Friends of Acadia
www.friendsofacadia.org

Maine Center for Coastal Fisheries
www.coastalfisheries.org
National Parks Conservation Association
www.npca.org

Place-based Frenchman Bay Businesses:

Zach Piper, Owner & Operator
F/V Overtime

Tyler Piper, Owner & Operator
F/V Overkill

Frenchman Bay Oyster Company
Graham Plattner, Owner & Operator

Springtide Seaweed, LLC
Sarah Redmond, Founder
www.springtideseaweed.com

Maine Coast Sea Vegetables
Shep and Seraphina Erhart
www.seaveg.com

Frenchman Bay Region Citizens Groups:

Friends of Frenchman Bay
www.friendsoffrenchmanbay.org

Friends of Easter Bay
Jeri Bowers

Friends of Schoodic Peninsula
Colleen MacGregor Wallace

Representatives of Other Regional Institutions:

Jane Disney, Ph.D.
Senior Staff Scientist & Director, Community Environmental Health Laboratory
MDI Biological Laboratory

Chris Petersen, Ph.D.
Faculty, Ecology and Biology
College of the Atlantic

cc:

U.S. Senator Susan Collins
U.S. Senator Angus King
U.S. Representative Jared Golden
Governor Janet Mills
Commissioner Patrick Keliher, Maine Department of Marine Resources
Commissioner Melanie Loyzim, Maine Department of Environmental Protection
Maine State Senator Louis Luchini
Maine State Representative Lynne Williams
Maine State Representative Billy Bob Faulkingham