



## Natural Resources Council of Maine

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December 6, 2021

Cindy Dionne

Environmental Specialist, Bureau of Water Quality, Maine Department of Environmental Protection  
17 State House Station  
Augusta, ME 04333-0017

Mark C. Draper, Chair

Board of Environmental Protection  
17 State House Station  
Augusta, ME 04333-0017

Via Electronic Mail

Dear Ms. Dionne and Mr. Draper:

I am writing on behalf of the Natural Resources Council of Maine (NRCM), which is Maine's largest environmental advocacy group with more than 25,000 members and supporters. I write in strong opposition to the proposed American Aquaculture fish farm project in Frenchman's Bay. NRCM believes this project would have widespread, negative consequences given its scale and its discharge of billions of gallons of wastewater not subject to secondary treatment or nutrient removal. The project could cause serious economic and environmental impacts for the many towns and businesses that depend on Frenchman Bay. The proposal is also a threat to water quality around Acadia National Park, a major economic driver for the region and state. NRCM urges the DEP to deny American Aquafarms' Maine Pollution Discharge Elimination System (MPDES) applications. Barring an outright denial, we believe the DEP should assume jurisdiction of what is clearly a project of statewide significance and conduct a public hearing consolidating all of the DEP permits necessary for this project.

Fundamentally, NRCM opposes Atlantic salmon net pen aquaculture. The dangers of escaped farmed salmon interbreeding or competing with the few remaining wild salmon in Maine are well known. Net pen aquaculture also allows untreated wastewater discharges that contain fish wastes, antibiotics, other chemicals, and fish food. American Aquaculture is essentially proposing an enormous net pen fish farm with only the ability to capture and remove settled solids from the pens. The pens would discharge all dissolved waste, which would include large amounts of bioavailable nitrogen and phosphorus and unsettled solids into the high-quality waters of Frenchman Bay. The scale of these discharges—4.1 billion gallons of wastewater per day— is almost unimaginable in Maine. To put this number in

perspective, it would be equal to three times the discharge of all sewage plants serving New York City.<sup>1</sup> Again, this wastewater would also undergo no secondary treatment.

Judging from the other applications for large-scale aquaculture facilities in Maine, the industry here is moving away from net pen aquaculture entirely and toward land-based operations. Although these land-based facilities have sometimes been controversial, they clearly offer the opportunities for eliminating escapees and providing secondary or tertiary treatment to wastewater that no net pen facility could allow. The American Aquafarms project would be a huge step backwards for Maine. Again, NRCM believes DEP should deny the proposed MEPDES applications, and barring a denial, the BEP should take jurisdiction over this project and hold a consolidated hearing on all of the relevant DEP permits that the project would require.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Nick Bennett". The signature is written in a cursive, flowing style.

Nick Bennett  
Staff Scientist

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<sup>1</sup> Accessed at <https://crabtreenecklandtrust.org/news/frenchman-bay-united/>