



26 February 2010

Brian Kavanah
Director, Division of Water Quality Management
Division of Water Quality Management
Maine Department of Environmental Protection
State House Station #17
Augusta, ME 04333

Dear Mr. Kavanah,

Friends of Blue Hill Bay (FOBHB) is writing in response to the recent "Notice of Intent to File Maine Waste Discharge General Permit for Atlantic Salmon Aquaculture, MEG 1300000, Atlantic Salmon of Maine, LLC of Machiasport" for the site at Scrag Island (SWAN HS) located in East Blue Hill Bay.

First of all, we would like to thank Matt Young of the Department of Environmental Protection (DEP) for sending us both the drug use and water quality violation data so that we could effectively review and comment on the Scrag Island application.

Friends of Blue Hill Bay has reviewed the information and would like to express our extreme concern about the amount of pesticides that are being applied to farmed salmon in Maine's bays and ultimately entering the Gulf of Maine. In 2009 alone there were 318 applications of pesticides over 5 months at 7 locations in the state. That's an average of 45 applications per site. We are concerned that residual pesticides are entering the water column and harming the benthic community, specifically crustaceans. We would hope that the DEP would have more concern for the overall health of the state's water quality rather than sacrifice it for the sake of farmed Atlantic salmon. Furthermore, if the incidence of sea lice is high enough as to warrant this level of pesticide use, then the Department of Environmental Protection should be examining the cultural and management practices which have led to such infestation. The DEP, the Maine Department of Marine Resources, and the Maine Board of Pesticides Control should be working more diligently with industry to develop Best Management Practices that avoid the occurrence of such infestations (e.g., increased spacing, less density, etc) and promote only the most judicious use of pesticides.

Friends of Blue Hill Bay continues to have concerns regarding water quality and the development of anoxia in the water column and benthic sediment under and around salmon aquaculture pens. The abundant presence of *Capitella capitata* and *Beggiatoa spp.* in the areas beneath the salmon farms, as an indicator of extremely polluted conditions, clearly demonstrates the problems that are ever present. Polluted conditions, as a result of these salmon farms, continue to occur in the state's public waters. Warned violators appear to continue their salmon farming operations unrestrained.

While we applaud Department of Environmental Protection's efforts to monitor for sulfides and *Beggiatoa* development at active salmon farms we also strongly advocate that the Department continue diligent monitoring efforts and the citing of violators. We are also asking the Department of Environmental Protection be much more thorough and restrictive in their permitting process.

Finally, FOBHB strongly opposes the permitting of the Scrag Island aquaculture site by Atlantic Salmon of Maine, LLC because we are not confident they will be able to comply with the terms and conditions of the General Permit and that the health of public waters of the State of Maine will be jeopardized. Between 2004 and 2007, 160 of the 384 regulated facilities that hold discharge permits in Maine had permit violations. The top 30 these violators were finfish aquaculture facilities and fish hatcheries¹. Atlantic Salmon of Maine, LLC was one of the top ten violators with 27 violations at three locations.

Negative environmental impacts from salmon farming continue at aquaculture sites in eastern Maine with tidal impacts far greater than at the proposed Scrag Island site. We believe that if the waters of Maine are to be truly protected by the Department of Environmental Protection you will deny the discharge permit at Scrag Island.

Thank you for your time and cooperation.

Sincerely,

Donald Eley
President
Friends of Blue Hill Bay

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¹ New York Times. 2009. "Clean Water Laws Are Neglected, at a Cost in Suffering"
http://www.nytimes.com/2009/09/13/us/13water.html?_r=1&emc=eta1