

May 10, 2021

Mr. Jay Clement
Senior Project Manager
U.S. Army Corps of Engineers
Maine Office
442 Civic Center Drive, Suite 350
Augusta, ME 04330

Dear Mr. Clement:

Friends of Acadia is writing to express our significant concerns about the proposal from American Aquafarms to establish two 60-acre lease sites for salmon farms in Upper Frenchman Bay. We request that the Army Corps of Engineers (USACE) require that American Aquafarms complete a full Environmental Impact Statement (EIS). We believe that the project merits a full EIS because of the significant environmental controversy over the project and because this is the first use of semi-enclosed aquaculture pens at this scale in North America. A full analysis and disclosure of risks and benefits along with other alternatives is warranted, especially since the project borders a national park.

Friends of Acadia's mission is to preserve, protect, and promote stewardship of the outstanding natural beauty, ecological vitality, and distinctive cultural resources of Acadia National Park and the surrounding communities for the inspiration and enjoyment of current and future generations. Our 5,000 members share a common love for Acadia as one of the nation's crown jewels in the National Park System, and many of them have shared concerns with us about American Aquafarms' proposal for salmon farms in proximity to the park.

Our members' concerns stem first and foremost from the scale of the proposed salmon farms. Frenchman Bay has a long history of small-scale aquaculture operations that live in harmony with traditional uses of the Bay, such as lobstering, recreational boating, and tourism. American Aquafarms' large 60-acre lease sites would include 15 pens (each pen approximately 147-feet in diameter), generators, and a barge. The pens would be serviced by a 145-foot vessel, as well as a 50-foot secondary vessel that would travel year-round from Prospect Harbor. The farms are expected to grow 66 million pounds of salmon per year. This is an unprecedented industrial use that will discharge pollutants directly into Frenchman Bay. Unlike cruise ships, these pens would be permanent fixtures, operating continuously in all seasons for the twenty-year lease and potentially beyond.

Impacts to the scenery, natural soundscapes, and night skies are also frequently mentioned by our members as concerns. Acadia National Park's foundation document lists scenic resources as one of the fundamental resources and values of the park:

The scenic views of Acadia and the surrounding landscape are unparalleled along the East Coast of the United States. From this landscape, the park offers views of surrounding mountains, stunning sunrises and sunsets, fog-blanketed islands, stormy seas, and inspiring night skies.
https://www.nps.gov/acad/learn/management/upload/ACAD_FD_2016_508-2017.pdf,
p. 13)

Impacts to this nationally significant scenery deserve full vetting by the public in an EIS. The salmon farms will be visible from vistas along the Paradise Hill sections of the carriage roads and motor-road system, both of which are on the National Register of Historic Places. They will also be visible from the

Mr. Jay Clement
Army Corps of Engineers
May 10, 2021
Page Two

Bluffs area of Route 3, which has been designated as an "All-American Road", the highest level of scenic classification in the National Scenic Byways Program. American Aquafarms' salmon farms will require lighting, as well as continuously operating generators to pump water through the pens to keep the membranes extended. It is critically important that the public have a chance to weigh in on the potential permanent degradation of these nationally significant viewsheds and soundscapes.

Friends of Acadia has also heard from members about navigational challenges that the salmon farms will present for fishermen and for recreational boaters in Upper Frenchman Bay. The farms will reduce the area that lobstermen can fish in a protected bay environment, and the lobstermen risk greater loss of traps as American Aquafarms' ships move back and forth from Gouldsboro to the lease sites. Sailboats, recreational motorboats, and commercial tour operations from the Bar Harbor waterfront also frequent the lease sites, especially when seas are too rough to traverse Lower Frenchman Bay. The impacts of adding two 60-acre permanently fixed salmon farms within a bay that is heavily used and scattered with lobster traps, need to be fully assessed.

And finally, the impacts to the health of Frenchman Bay from this technology that is untested in the United States need to be understood. The discharge permit for the lease sites is anticipated to call for a flow of 90m³/s circulated water through the pens. The pens also draw cold water to the surface and discharge nitrogen rich wastewater lower into the water column. What impacts will the velocity, volume, and location of the discharge have on Frenchman Bay's wild fisheries? Bar Harbor's 24 full-time lobster boat captains landed over a million pounds of lobster in 2020, valued at \$4,838,414. Maine's traditional fisheries and cultural heritage deserve protection from harm.

Friends of Acadia supports the use of an Environmental Impact Statement to broadly consider all perspectives about American Aquafarms' proposal for 60-acre salmon farm sites in Frenchman Bay. An EIS allows for consideration of cumulative impacts, which is vital given the interconnected nature of the bay's values and how they would be affected by the proposal. Given the nationally significant resource of Acadia National Park and the economic value of tourism generated by the park (over \$379M in visitor spending in 2019), we believe that an EIS is warranted to assess potential harm to this national resource and all who benefit from it.

Thank you for considering these comments. If you have questions, please do not hesitate to contact me at 207-288-3340 or david@friendsofacadia.org.

Sincerely,



David R. MacDonald
President & CEO

cc: Kevin Schneider, Superintendent, Acadia National Park
Kirk F. Mohny, Director and State Officer, Maine State Historic Preservation Commission
Patrick Keliher, Commissioner, Maine Department of Marine Resources
Melanie Loyzim, Commissioner, Maine Department of Environmental Protection
Senator Susan Collins
Senator Angus King
Representative Jared Golden
Representative Chellie Pingree