



United States Department of the Interior

NATIONAL PARK SERVICE

Acadia National Park
P.O. Box 177
Bar Harbor, Maine 04609

IN REPLY REFER TO:

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JUL 06 2021

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Ms. Marcy Nelson
Acting Director, Aquaculture Division
Maine Department of Marine Resources
Attn: Aquaculture Division
21 State House Station
Augusta, Maine 04333-0021

Dear Ms. Nelson:

We appreciate the opportunity to submit scoping comments in regard to the two draft aquaculture lease applications submitted to the Maine Department of Marine Resources by American Aquafarms, Inc.

American Aquafarms is proposing to develop a 120-acre industrialized salmon farm on Frenchman Bay located just 2,000 feet from Acadia National Park at its closest point. While many other commercial fishing and aquaculture activities take place within Frenchman Bay, and exist in harmony with Acadia National Park, this development is fundamentally different than existing aquaculture operations near the park. The scale of the development—the equivalent of 16 football fields—is unprecedented in the United States and incongruous with the existing nature and setting of Frenchman Bay and its surrounding lands.

Acadia National Park was established in 1916 to protect the outstanding scenic qualities, and natural and cultural resources of an area that stretches 50 miles across the coast of Maine from Schoodic Point to the Penobscot Shipping Channel. Acadia was the first national park established in the eastern United States and today is one of America's most iconic national parks. Much of the reason that Acadia is so unique on the east coast of the United States is that it exists largely within a relatively pastoral, undeveloped landscape.

Acadia includes more than 38,000 acres in fee owned lands and 12,500 acres in conservation easements that cover much of Mount Desert Island, Isle au Haut, Schoodic Peninsula, and more than 100 islands. These lands provide millions of visitors with the opportunity to experience and be inspired by the exceptional qualities of the park's nationally significant resources.

Visitors come from around the world to hike, bike, paddle, and enjoy the magnificent scenery in and around Acadia National Park. In 2019, visitors to Acadia contributed \$511 million to the regional economy and supported nearly 5,500 jobs in communities within 60 miles of the park. As the primary tourist destination in Maine, Acadia plays a key role in the state's tourism economy. In 2019, tourists to Maine spent nearly \$6.5 billion dollars, which supported more than 116,000 jobs—about 17% of employment—making it one of the state's largest industries.

The park is not just a magnet for tourism but provides quality of life benefits to year-round residents. The opportunity to recreate in this inspiring place just a short drive from home is why so many have retired here, moved their business, or have chosen to call this place home. Living with a national park in your backyard, and the amenity values it provides, significantly improves the quality of life for area residents and also further drives the local economy.

NPS Management Policies 2006 direct us to monitor proposed changes outside to the park for their potential impacts on park resources and values, and to engage constructively with the broader community in the same way that any neighbor would. We continually encourage compatible adjacent land uses and seek to avoid and mitigate potential adverse impacts on park resources and values by actively participating in the planning and regulatory processes of other federal, tribal, state, and local governments having jurisdiction over the proposed use or development.

Cooperative conservation beyond park boundaries is necessary for the NPS to fulfill its mandate to preserve national parks unimpaired for future generations. Our natural resources cross park boundaries, and many of the scenic vistas enjoyed by Acadia's visitors include lands not owned by the NPS. Therefore, we know activities proposed for adjacent lands and waters may significantly affect park resources and values.

The NPS has identified a range of potentially significant impacts to the park's resources and values, including the experience of visitors. While we are continuing to review and evaluate available information, we have identified the following clarifying questions that need to be addressed to adequately assess impacts to the park's scenic and historic resources, night sky, natural soundscape, water quality, air quality, and flora/fauna.

Scenic and Historic Resources

The development will be visible from numerous locations throughout Acadia National Park, including the hiking trails, carriage roads, and motor roads listed in the National Register of Historic Places. These recreational and transportation networks were thoughtfully designed to enhance opportunities to provide scenic views of the surrounding mountains, lakes, islands, and open marine waters, including Frenchman Bay. Has a comprehensive viewshed analysis been completed to assess the potential impacts to scenic and historic views of Frenchman Bay from these historic resources? Does this analysis include vessels that will be serving the pens, as well as the infrastructure necessary for operations, such as the barges, generators, and oxygen storage tanks? Has the Maine State Historic Preservation Officer been consulted to determine the Area of Potential Effect and identify the number and location of representative viewpoints from historic properties in Acadia National Park?

Night Sky

The NPS is concerned with the lighting associated with the proposed development and operations. Measurements of night sky, and the contrast between stars and background darkness indicate that Acadia National Park has among the darkest night skies in the northeastern United States. Lighting in the lease areas will include navigation lights, exterior floodlights, submerged husbandry lighting, and walkway lighting. Have the impacts to the night sky been determined? Have visualizations of the nighttime operation been prepared and analyzed?

Natural Soundscape

How will the generators and mechanical systems impact the natural soundscapes of the park during the day and night? What are the anticipated sound levels of the generators (normal operations and when all 30 back-up generators are operating), fish harvesting and maintenance vessels, and other operations? What is the cumulative impact on the natural soundscape of all the activities associated with the operation? Will canons or other sound devices be used to deter gulls and other birds from flocking over the pens?

Water Quality

What baseline and long-term water quality monitoring will be conducted in the vicinity of pens (e.g., temperature, salinity, pH, DO, TOC, dissolved carbon, toxins, HABs)? What values are considered acceptable if above baseline, and what action will be taken if values deviate above baseline or pre-determined levels? Will there be ongoing monitoring of nutrients from discharged water to confirm that it is within the parameters of the permit?

Has an analysis been conducted to assess the impact of strong storms on the stability and integrity of the pen systems? What scenarios of high winds, waves, currents, and icing events caused by hurricanes and Nor'easters have been incorporated into the operational plan? The application notes that the containment can withstand up to 28 meters of stress per square meter and is based on decades of operational experiences in Norwegian salmon farming; however, it does not discuss local or regional conditions or experiences in Frenchman Bay. The application includes only one day of current meter monitoring, so is there modeling to extrapolate to an entire spring/neap tidal cycle and extreme events?

What happens in a prolonged storm event or a failure in the mechanical systems to the solid waste that is built up? Is there a mechanism for overboard discharge of the solid waste? What potential impacts occur to the water quality from overboard discharge of solid waste either in the collection from the pen, or transfer to transport vessel? What storm events have the infrastructure and mooring system been tested to?

How rigid is the gear and has it been tested in coastal Maine conditions? What are the failsafe systems associated with this type of technology? What has been the failure rate of these structures in other locations where they are implemented in Norway or other parts of the world? Has ice loading from winter storm events been modelled for infrastructure failure? Will there be a monetary bond secured with the State of Maine to account for potential ecological disaster associated with the failure or storm destruction of the pens?

Air Quality

Acadia National Park is a designated Class I area under the Clean Air Act. Through this designation, the NPS is responsible for protecting the air quality and Air Quality Related Values (AQRVs) in the park. Acadia National Park is required to have among the cleanest air in the nation and cannot experience degradation of its air quality and visibility. AQRVs are resources that are sensitive to air pollution such as soils, water, vegetation, fish. Under the Clean Air Act, the NPS has the responsibility work collaboratively with Federal and state regulators to protect AQRVs in Class I areas the NPS manages, including Acadia National Park. Therefore, we request that the potential air emissions associated with this project are determined and evaluated for impacts to air quality and AQRVs in the Class I area for Acadia National Park. Potential emission sources include thirty floating pens, support barge, maintenance vessels, and land-based processing facility and truck transportation vehicles. A thorough, full emissions inventory should be developed and if necessary, air modeling should be completed to evaluate and document potential impacts to the park. What cumulative emission analysis will be completed for the proposed operation?

Flora/Fauna

With extreme climate events becoming more common and intense there is the potential for the pens to release pathogens or nonnative species into Frenchman Bay and the coastal ecosystem of Acadia National Park. Additional intensive shipping activity associated with this project into Frenchman Bay also adds to the likelihood of a new invasive species introduction. Submerged infrastructure will aggregate fish and increase likelihood for invasive species colonization. Will there be any monitoring or cleaning of the outside of the pens and mooring systems to prevent the establishment and growth of nonnative invasive marine life that create havoc to local ecology?

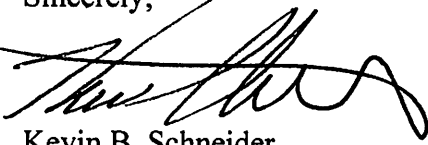
It is possible that established populations on the submerged infrastructure associated with this project may expand into the rocky intertidal area of Acadia National Park. Ocean acidification from excess carbon dioxide in the water impacts the ability of intertidal species to build shells. Waste from finfish contain nutrients that cause algae blooms. After the phytoplankton die off and decompose, more carbon dioxide is released into the water, furthering ocean acidification. Will there be ongoing monitoring of algae blooms and other impacts to the intertidal environment?

Cumulative Impacts

In addition to resource-specific impacts, the NPS is requesting a thorough review of potential cumulative impacts from the water-based development, shipping activities, and land-based fish processing and distribution. The processing plant and year-round use of vessels and vehicles that support the fish production and distribution to market will contribute to the overall impact of the operation on scenic views, night sky, natural soundscape, water quality, and air quality. What are the cumulative impacts of the entire scope of the proposed fish farm, processing facility, and distribution of the product to market?

Thank you for the opportunity to comment on this proposal. We look forward to participating in the Maine Department of Marine Resource review process. If you have any questions, please contact John Kelly, Management Assistant, Acadia National Park, at john_t_kelly@nps.gov or 207-288-8703.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin B. Schneider", written over a horizontal line.

Kevin B. Schneider
Superintendent