

October 12, 2022

Maryland Department of the Environment  
Water and Science Administration- Industrial Stormwater Permits Division  
ATTN Mr. Paul Hlavinka  
1800 Washington Boulevard Suite 455  
Baltimore, Maryland 21230-1708

Re: Tentative Permit Number 21-DP-33867

Dear Mr. Hlavinka,

We, the undersigned recreational fishing organization representatives, respectfully urge the Maryland Department of the Environment (MDE) to reject AquaCon's draft discharge permit application for a land-based Atlantic salmon facility on the shores of Marshyhope Creek in Federalsburg, Maryland due to insufficient scientific information and an absence of a contingency plan in the event of a catastrophic spill.

A tributary of the Nanticoke River and Chesapeake Bay, Marshyhope Creek supports several popular recreational fish including striped bass (rockfish), yellow and white perch, largemouth bass and catfish. Not only is the Marshyhope an economic driver for local and regional businesses, these fish also represent an important and affordable food source for the region's subsistence anglers and come under the purview of intensive management plans carried out by the Department of Natural Resources. The Marshyhope also supports a growing population of endangered Atlantic sturgeon. An industrial facility of this magnitude would likely undermine these restoration efforts. Moreover, the Marshyhope is popular with boaters, providing them access to the Nanticoke River and Chesapeake Bay.

We are also concerned that this industrial-scale salmon operation would stress native forage fish species such as Atlantic menhaden, which are caught and ground into feed for large-scale aquaculture operations. Menhaden are a keystone species in the Bay's ecosystem. We are concerned that AquaCon's operation would pile on more pressure to harvest menhaden at a time when more conservation of this critical forage is required. That's the wrong direction to take with our public marine resources.

As drafted, the permit could imperil the area's already fragile ecosystem by allowing the Norwegian company to discharge **2.3 million gallons per day of "salmon tank purge water"** directly into the Marshyhope Creek. This would further threaten the Marshyhope's water quality as well as substantially increase the normal flow of the Creek, disturbing fish and fish habitats. The technology proposed by AquaCon to treat effluent water is experimental at best. Our waterways already face numerous challenges, as do the game fish populations and habitats they rely upon. They should not be used as guinea pigs for an unproven, industrial-scale aquaculture operation.

For these reasons, it is clear to us that the Maryland Department of the Environment must deny the discharge permit requested by Aquacon. In doing so, MDE would carry out one of its core responsibilities: Protecting Maryland's water quality and habitats, and the life they support. We thank you for your thoughtful consideration and the opportunity to submit our comments.

Respectfully,

David Sikorski, Executive Director - Coastal Conservation Association Maryland

Tom Wilkinson, President - Mid-Shore Fishing Club

Roger Trageser, President – Maryland Bass Nation

Kevin McMenamin, President - Annapolis Anglers Club

Mark Kurth, President – Northwest Fishing Club

Phil Zalesak, President – Southern Maryland Recreational Fishing Organization

Bert Olmstead, President – Kent Island Fishermen