



*Forming Faithful Stewards,  
Caring for Sacred Waters*

PO Box 6791  
Annapolis, MD 21401

October 13, 2022

**VIA EMAIL: paul.hlavinka@maryland.gov**

Paul Hlavinka  
Maryland Department of Environment  
Water & Science Administration  
1800 Washington Blvd.  
Baltimore, MD 21230

RE: Environmental Concerns Regarding AquaCon's Proposed Water Discharge Permit

**Position: Unfavorable**

Dear Mr. Hlavinka,

Interfaith Partners for the Chesapeake is writing in regard to AquaCon's proposed above-ground salmon farm in Federalsburg, Maryland along the Marshyhope Creek. AquaCon has proposed to build a 25-acre above-ground salmon farm using recirculating aquaculture technology and is requesting approval for a water discharge permit for 2.3 million gallons of discharged purge water per day. It is our understanding that this purge water is generated in the final stages of salmon production in an effort to rid the fish of geosmin before they are processed. **Interfaith Partners for the Chesapeake is explicitly opposed to the Maryland Department of the Environment issuing a water discharge permit to AquaCon due to negative potential impacts to natural resources and surrounding communities.**

We believe that a deep understanding of the characteristics of the proposed discharge is needed to responsibly issue any discharge permit to AquaCon for their proposed facility. The draft permit does not include scientific estimates regarding the physical and chemical characteristics of the proposed discharge, including temperature, ammonia, nutrient content, pH, salinity, and pathogens. Likewise, the draft permit does not include evidence-based science regarding the treatment of geosmin, a chemical known to make the meat of fish off-tasting.

We are also concerned that there will be unintended consequences for biotic life inhabiting Marshyhope Creek. We are explicitly concerned with how minute changes to temperature and salinity will affect spawning populations of biotic life in the Marshyhope, including the endangered Atlantic sturgeon, water clarity and potential algal blooms, and potential impacts to the topography of Marshyhope Creek due to the amount of water being discharged.

Interfaith Partners for the Chesapeake is a non-profit organization leading a network of congregations who seek to be faithful stewards of the lands and waters of the Chesapeake. We and these congregations strongly believe that the natural world should not be manipulated for human benefit at the cost of other parts of that web of life. We speak for the voiceless members of that web of life, and for future generations who will inherit what we leave behind. We also believe that caring for the Chesapeake and its watershed is a shared responsibility and we look to our regulating agencies, such as

yours, to uphold protections for all members of that watershed so that the shared web of life may thrive together, sustainably. **Partaking in this shared responsibility, we strongly feel that the issuance of AquaCon's draft permit would be antithetical to caring for the Chesapeake Bay watershed, and the sacredness of all life therein.**

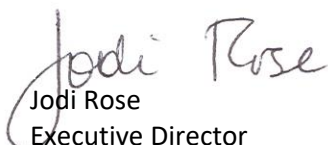
Given our concern for land and waters, Interfaith Partners for the Chesapeake additionally has concerns regarding the management of stormwater runoff from this proposed 25-acre facility. During one inch of rain, this facility could generate more than 750,000 gallons of polluted runoff, much of which would end up in the Marshyhope Creek. In addition, the draft permit allows for discharging almost 700 pounds of nitrogen above the Bay's Total Maximum Daily Load limits. At a minimum, a comprehensive plan to mitigate stormwater runoff using best management practices should be required to ensure the surrounding community and future generations do not suffer impacts from this new pollution source. **After all, hundreds of faith-based institutions are voluntarily reducing polluted stormwater on their properties for the betterment of their communities, and we should be demanding nothing less from corporate for-profit entities.**

Echoing the concerns of many Federalsburg residents, we are concerned that a long-term study has not been conducted to assess the impact of withdrawing 2.3 million gallons **daily** from the upper Patapsco and surficial aquifers. At present, it is unknown for how long 2.3 million gallons of water can be withdrawn from these aquifers daily before depletion and there are no outlined plans for alternative water sources, should these aquifers become depleted. Given the significance of that aquifer as the source of water for local agricultural irrigation, long-term unintended consequences from tapping this aquifer should be fully explored in order to protect the water needs of the surrounding community and livelihoods of farmers. **Water is life, and Marylanders deserve a sound and thorough evaluation of the impact of this water usage.**

Finally, there is the issue of die-offs and escapes at the proposed salmon farming facility. It has not been made clear how a die-off of diseased or non-diseased fish would be handled and the fish disposed of, as there are no contingencies for this possibility outlined in the draft permit. Similarly, the permit omits contingencies regarding the possibility of escaped fish.

Inspired by the words of Wendell Berry, "Do unto those downstream as you would have those upstream do unto you," we ask you to consider the far-reaching, long-term impacts of an insufficiently evaluated AquaCon proposal that endangers an entire species (the Atlantic Sturgeon), entire communities, and the sacred waters and ecosystems of the Marshyhope, downstream to the Nanticoke, and into the Chesapeake Bay. **We call on you to consider the voiceless web of life and future generations that will suffer from such a proposal.**

Respectfully,

  
Jodi Rose  
Executive Director