

McNamara, Cade

From: mandre <mandre2391@gmail.com>
Sent: Friday, February 18, 2022 2:22 PM
To: CEQAResponses
Subject: RE: Draft EIR Nordic Aquafarms Land-Based Aquaculture Project

Cade McNamara
County of Humboldt Planning and Building Department,
Planning Division 3015 H Street
Eureka, CA 95501
RE: Draft EIR Nordic Aquafarms Land-Based Aquaculture Project

To Whom it may concern

My questions are related to 3.7 Greenhouse Gas Emissions,

- 1. Humboldt County is working on preparing a multi-jurisdictional Climate Action Plan with all jurisdictions within the County; however, the County does not have an adopted Climate Action Plan.**

Question(s): I am curious why the Yolo County CAP was used as the proxy CAP for evaluating consistency of GHG reduction goals. Yolo County is indeed a county with a large agricultural sector but it is a very different agricultural sector than Humboldt County. Did the plan preparers consider CAPs from Butte, Sonoma, Monterey or other counties before selecting Yolo? Does the Humboldt County Draft Climate Action Plan that is currently under review by County staff state GHG reduction goals that are similar to Yolo County? Are there backup diesel generators that are expected to be used in the event of a power outage? Has that potential GHG emission source been added to the modeled GHG estimate?

The Yolo County CAP demonstrates an ability to achieve a 27 percent reduction below 1990 emissions levels by 2030. This reduction goal does not seem very ambitious or robust. Per the DEIR, the Nordic Aquafarm facility will represent 21% of the energy use in the county (Image 3.5-1: Annual electric use at full build out circa 2030 as a fraction of current total County load). The plan proposes only 3% onsite PV generation. If a project that generates 21% of the total county energy use creates a less than significant environmental effect requiring no mitigation, then what sized facility would create a significant adverse effect for Energy and GHG? 40%? 60%? 80%? The project should utilize the RCEA 100% renewable portfolio as a condition of approval.

- 2. Table 3.7-1 Operational Greenhouse Gas Pollutant Emissions related to Sludge and Fish Waste Hauling**

Question(s): In the GHG section Table 3.7-1, which section consists of the sludge and fish waste hauling from the facility to an out of county processing facility? The "waste" category or 361 mT per year or the "mobile hauling" or 2471 mT per year? Is it known that the facility where this organic waste will be hauled has methane capture capability? Is the facility mentioned in the DEIR a long-term operational guarantee or is it possible that the waste could be landfilled at some point?

Regardless, this county is in need of a regional organic waste composting facility and the volume of material presented in the DEIR appears to show that this waste stream could be a catalyst for developing such a facility locally. And if such a facility was developed it would provide for a significant reduction of GHG emissions associated with the Nordic Aquafarm facility.

Regards



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