McNamara, Cade

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Sent: Friday, February 18, 2022 3:03 PM
To: CEQAResponses
Subject: Nordic Aquafarm DEIR comments

February 18, 2022

Humboldt County Building and Planning Department

RE: Nordic Aquafarm DEIR comments

Thank you for the opportunity to provide comments on the Draft Environmental Impact Report (DEIR) prepared for the Nordic Aquafarm (NA) proposed salmon farm on the Samoa Peninsula.

As noted in the DEIR, this project will consume a vast amount of electricity, greater than that required to power every home, business, and governmental building in the cities of Eureka and Fortuna combined. When fully developed it will almost certainly demand the largest amount of electrical energy of any single industrial development in Humboldt County history.

In the context of rapidly growing impacts of climate change in the Humboldt County region (rising temperatures and increased periods of drought resulting in extraordinarily low streamflows in regional streams, and rapid increases in size and intensity of regional wildfires), the project's electrical demand and the nature of the resources that will be tapped to meet this demand deserve close attention. Further, Humboldt County experiences limited connectivity to the statewide power grid, meaning that without costly improvements to high voltage transmission lines, much of the electricity to power NA will be locally generated.

I really appreciate that NA developers propose an onsite solar PV array, but as the DEIR reports, this would contribute only 3% of the project's power at full build-out. Expanded use of solar PV at or near the project site is of limited value due to the high amount of coastal overcast at the project site and the lack of battery storage. It's highly likely that as the project expands to completion the vast majority of its power will come from PG&E's Humboldt Bay Generating Station (HBGS), which burns natural gas.

The DEIR assumes statutory requirements for electrical utilities to reduce GHG emissions in electricity production statewide as the main method of viewing the project as presenting no significant impact from the GHG emissions in producing its power. The assumption appears to be that even if natural gas provides most of NA's power, state requirements that PG&E and other utilities decarbonize will negate the regional fluke this represents.

Not considered is the fact that California faces serious challenges in "greening" its electrical power grid at the same time that PG&E's Diablo Canyon project is coming offline, and while industrial-scale renewable electricity sources statewide present significant environmental impacts which have led to delays in many of those projects coming online as planned. This must be taken into consideration as a part of the environmental review process for a project of this size, and developing contingency plans for how the project's power will be sourced from renewable or carbon-free resources -- at least to the extent required of California electrical utilities -- must be addressed. It may be that some diversity of power resources might be the "safest" plan for a project of this size and with a requirement of 24/7 power availability. This could be a "win-win" if a variety of smaller wind and solar projects took the place of 97% reliance on one high GHG-emitting plant, sited near an earthquake fault and only feet above a rising sea level.

Another issue in the area of GHG emissions is the use of huge amounts of refrigerants for NA. Obviously, cold water fish require cold water, constantly throughout the year. Refrigerants leak in small amounts through flaws in cooling systems as well as in larger amounts when maintenance is required or when a cooling system comes offline. Assiduous care to reduce leakage helps but even more important from the standpoint of reducing climate impacts is use of so-called "green" refrigerants that present lower Global Warming Potential (GWP). Given the extremely large amounts of refrigerants that will be used by NA, it would seem to be a reasonable mitigation to *require* use of the lowest GWP refrigerants feasible for this project.

An additional concern that I have about the DEIR are impacts caused by the large amount of vehicle traffic to and from NA's facility. There is no bus service to the NA site and with the large number of daily commute trips by employees, and truck traffic to service the project, this would seem to potentially reach "significant impact" status in terms of the Vehicle Miles Traveled (VMT) standard. It doesn't seem like it would be too much effort for NA to develop vanpools or other transportation assistance for its employees to reduce their single-occupant, ten trips per week use of their cars, and this would be a reasonable mitigation to be required both to reduce GHG impacts as well as increase safety on a highway that is often popular for bicyclists and pedestrians.

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