

McNamara, Cade

From: Lina C Carro <lina.carro@humboldt.edu>
Sent: Friday, February 18, 2022 12:31 PM
To: CEQAResponses
Subject: Draft EIR Nordic Aquafarms Land-Based Aquaculture Project comments

February 18, 2022

Sent via email to address shown below

Planning Director John Ford
Humboldt County Planning & Building Department 3015 H Street
Eureka, CA 95501 CEQAResponses@co.humboldt.ca.us

Dear Planning Director Ford,

I am writing to express only some of my many concerns about the Nordic Fish Farm project's Draft Environmental Impact Report (DEIR). I agree with the findings of the coalition of our local environmental groups that significant impacts have not been fully assessed and mitigated. These impacts include, but are not limited to, increased electricity demands, greenhouse gas emissions, ocean discharge, and traffic disturbance and other impacts to our community and our quality of life.

At full build out, it would use 21% of the county's energy supplies - *as much as the cities of Eureka and Fortuna combined*. And yet the draft EIR concludes there would be no significant impacts from greenhouse gas emissions, truck traffic, bay intakes that will draw 10,000,000 gallons and an ocean discharge of 12,000,000 gallons of treated wastewater a day.

At minimum, the following changes will help to reduce some of the fish farm's impacts. To make sure Nordic commits to these changes, I am requesting the following modifications:

1. An explicit requirement in the EIR that the project will, from day one of operations, be powered solely through renewable energy.
2. The project maximizes its feasible onsite renewable energy production through more aggressive utilization of solar, including over parking areas.
3. An adaptive management provision that requires Nordic to buy locally-produced renewable power as it is commercially available.
4. Modeling of ambient water quality using data from the mixing zone near the RMT II diffuser, instead of the data taken from Humboldt Bay (approximately 3.5 miles south-southeast of the discharge point).
5. Baseline monitoring and continuous monitoring of the effluent should be performed by experts and compared to an established threshold which would trigger protective actions.
6. Provide a better, more complete analysis of truck traffic impact. The DEIR says that the project will generate 95 new truck trips each week, but after reviewing the data the actual number is likely to be at least twice that. These trucks will travel long distances with heavy loads, producing a lot of climate-harming emissions and new hazards for people biking and walking as they pass through Eureka and Arcata, not to mention, produce serious wear and tear on our roads. The fish farm will also employ 150

employees in a location that has few alternatives to driving to work in our large, rural county. I think that the fish farm needs to provide or lend financial support to create transportation options for their employees as well as mitigate some of the damage their truck traffic will have on our county roads.

7. Provide a more complete detailing of mitigations for seabirds, Northern Harriers, and Short-Eared Owls.
8. Section 5.3- Non-Special status marine species: Provide details of protection for Non-Special status marine species that are listed as being impacted at moderate and high impact levels.
9. Correct erroneous information about the preparers of the DEIR document. Ken Mierzwa is listed as one of four preparers of the DEIR which is not correct. (In fact, Mr. Mierzwa stated that he would have refused to put his name on this DEIR because so many items require additional analysis and/or additional mitigation.)

Such an "oversight" demonstrates how little care and thoroughness went into the creation of the Draft EIR Nordic Aquafarms Land-Based Aquaculture Project document.

Thank you for considering my comments and for guiding our county through this planning process.

Sincerely,
Lina Carro
101 Misty Hill Ln.
Eureka, CA 95503