

McNamara, Cade

From: Carol Somebody <carolcon25@gmail.com>
Sent: Wednesday, February 16, 2022 1:40 PM
To: CEQAResponses
Cc: Madrone, Steve
Subject: Humboldt County's Draft Environmental Impact Report (DEIR) for the Nordic Aquafarms project

Nordic Aquafarms and Public Safety Power Shutoff Events

Global warming's impact on Humboldt County is often depicted in terms of anticipated ocean rise—an important concern. But the most immediate effects for most residents are the threat of wildfires.

Coastal communities located in Humboldt County experience increased disruptions in electrical services as PG&E responds to fire threats with Public Safety Power Shutoff events. These shutoffs are occasioned not only by active fires, but by high winds, lightning storms, excessive heat, and drought. Given warming trends, we know these events, already common, will become more frequent.

The effects of these power disruptions have been minimized locally by “islanding” of the Humboldt Bay Generation Station, a 163 MW powerplant capable of servicing up to 67,000 customers during interruptions in service connections to the grid. The plant is able to do this via turbines designed to run on both natural gas (which is piped in overland) and low sulfur diesel. Thanks to islanding, many residents living along the coast in Humboldt County have experienced few regional power outages after the first year of implementation of PSPS.

According to the draft Environmental Impact Statement submitted by Nordic Aquafarms, the facility foresees an approximate 22.3 MW demand and expects to require 21% of annual electricity used by the county at full buildout – as much electricity annually as Eureka and Fortuna combined. This is to be somewhat compensated for by a rooftop mounted solar PV system that will produce, at most, 4.85 MW. It is as yet unclear precisely how much power can be produced on site.

Nordic Aquafarms will be allowed 500 hours, or about 21 days, of emergency power generation on site provided by a diesel generator. They expect to use this backup during power outages, but it is unclear if they intend to utilize generators during PSPS events. If so, it's not hard to imagine more than 21 days of service interruption.

On the other hand, if Nordic Aquafarms intends to use locally produced power during PSPS events, given the limited capacity of the Humboldt Bay Generation Station and the increasing need for islanding, it is difficult to imagine that PG&E would be capable of supplying the additional demands of Nordic Aquafarms during islanding without negatively impacting service to the community at large.

It is incumbent on representatives of our community to consider closely the impact of increased electricity demand during islanding as this project is under review.

Thank You,

Carol Conaway

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