

McNamara, Cade

From: Maggi Draper <maggi@humboldt1.com>
Sent: Wednesday, February 16, 2022 4:34 PM
To: CEQAResponses
Subject: comments on Humboldt County's Draft Environmental Impact Report (DEIR) for Nordic Aquafarms

Dear Humboldt County Planning,

This constitutes my comments on Humboldt County's Draft Environmental Impact Report (DEIR) for the **Nordic Aquafarms** project for the record.

In general, though the DEIR follows the general pattern of such documents, it fails at succinctly comparing and contrasting the environmental impacts with associated mitigations in a fashion that the public can absorb. The result is potential obfuscation or omission of important environmental impacts and issues and appropriate citizen comments. (Climate change is a good example of this in the document.) Perhaps more graphs would simplify representation of mitigations for impacts discussed. Also, the way the document is organized makes it difficult to assess overlapping impacts in different sections to reveal cumulative effects.

How is it that DEIR concludes there would be no greenhouse gas effect? It is astonishing that the electricity use by the Nordic Aquafarms project is projected to use 21% of Humboldt County's load. I have heard it said that the amount is at least equivalent to the usage of Eureka and Fortuna put together! The failure to adequately address this major environmental impact and greenhouse gas assault in the DEIR is abject. The proposal indicates that the company has not done enough to plan for generating its own power without greenhouse gas output, and it should be obligated to fully maximize onsite solar generation, offshore wind, the balance to be purchased renewable energy sources commensurate with Humboldt County's grid limitations... Mitigations should involve generation of **all** of project energy requirements via **maximum onsite solar**, **offshore wind**, and some **renewable** energy from a source that is demonstrably permanent in a revised EIR.

I find it very peculiar that Ken Mierzwa was listed as a preparer of the report, and yet says he was not involved. This error (though apologized for) is even more profound, given that Mr. Mierzwa has serious concerns with the DEIR's fish transport numbers and other elements; fish grown in Nordic's Samoa facility would still need to be trucked to markets up and down the West Coast. "That's not analyzed in the EIR but it ought to be," Mierzwa said.

There are issues with regard to report's greenhouse gas emissions analysis, which bases projections on PG&E's self-reported 2019 figures for carbon dioxide emissions per megawatt hour (possibly erroneous), and the choice of an incorrect carbon emissions threshold from the Bay Area Air Quality Management District. The latest 2019 figures may not be a suitable benchmark either.

Fish feed may be a significant emissions source and is not properly addressed. Fish feed should maximize feed that has been tracked for greenhouse gas emissions with the lowest level possible. The DEIR could include a plan for the company to leverage their position as a market leader to drive innovation and further increase the amount of vegetable and insect content in fish feed.

The truck traffic effect was inadequately assessed.

The DEIR should spell out adequate mitigations for the impacts of hydrofluorocarbons and hydrochlorofluorocarbons,

Also, it seems absurd to conclude that intake of 10 million gallons, and output of 12 million in water would *not* be deemed significant impacts on the environment. Assessment measures are deficient in that discharge

measurements should be taken *at* the discharge area, not several miles away from it-the two locations have potentially different temperatures, salinity and other conditions. Section 316(b) of the Clean Water Act, requires the EPA to issue regulations on the design and operation of intake structures for water flow - this has not been adequately addressed in the document.

Demoic acid affects should be addressed to solve any problems if toxic algae presence is amplified by this project, and a monitoring budget established therefore with appropriate mitigations included.

While the facility is set to be built in two phases, to allow Nordic to commission, operate and adjust the facility to local conditions (if necessary) before building the second half of the facility, I have seen nothing about what conditions need to be fulfilled before the second phase can be completed. The DEIR should have monitoring plans and analysis of methods to put the brakes on further development of the site if environmental goals are *not* met. No piecemealing to get things through the process unrecognized. This project holds promise for the community, but the scale is too much/too soon.

I was not born yesterday, and I have seen environmental documents become a paper parade in the path to further environmental destruction, blessed by momentum. As a Humboldt County taxpayer and citizen I take this seriously, and expect the County and the Company to continue working together to *refine* these planning documents BEFORE further administrative progress: it's much easier to tackle environmental consequences in the planning stage than find out later that unexpected consequences are costing the County financially and environmentally. This is not obstructionism, but rather good planning strategy for all concerned. I look forward to seeing an updated DEIR that reflects the cumulative impacts of various elements with regard to air and water emissions in a more comprehensive and thorough fashion.

Thank you for your work,

Margaret Draper



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