

McNamara, Cade

From: Frank Fogarty <fogartyfa@gmail.com>
Sent: Friday, February 18, 2022 4:22 PM
To: CEQAResponses
Subject: CNCC Comment Letter on Nordic Aquafarms DEIR
Attachments: CNCC Comment Letter on Nordic Aquafarms DEIR.pdf

Hello,

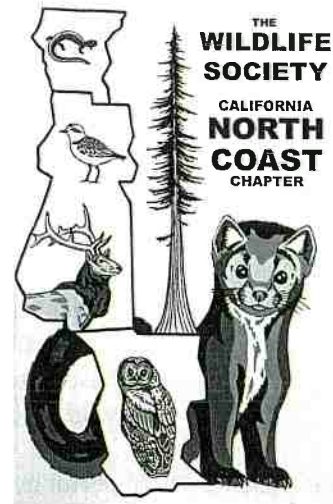
On behalf of the California North Coast Chapter of The Wildlife Society, I am submitting the attached comment letter on the Nordic Aquafarms DEIR.

Sincerely,

Dr. Frank Fogarty
President
California North Coast Chapter of The Wildlife Society

February 12, 2022

Cade McNamara, Planner II
County of Humboldt
Planning and Building Department, Planning Division
3015 H Street, Eureka, CA 95501
PlanningBuilding@co.humboldt.ca.us
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The CA North Coast Chapter of The Wildlife Society is a professional organization of Wildlife biologists. Our members work in all sectors of the wildlife field, academics, consultants, public and private organizations, as well as students. The California North Coast Chapter (CNCC) has approximately 150 members currently, and collectively we have hundreds of years of experience. We offer our professional opinion on the Nordic Aquafarms CA, LLC project Draft Environmental Impact Report (DEIR), case # PLN-2020-16698.

1. The Cumulative impacts section does not address several issues that are well known (or should have been known) to Nordic Aquafarms' project proponents. For example, water use from this project and other aquaculture producers will have adverse environmental effects on fish and Dungeness crab larvae due to entrainment at the new salt water intake installed to serve the Atlantic salmon farm. The Humboldt Bay Harbor, Recreation, and Conservation District (HBHRCD) has publicly announced plans to create a large "Terminal" complex immediately adjacent to Nordic Aquafarms.
2. Section 2.4.2: The salt water intake pumps at the old pulp mill site are not operable, and therefore do not adversely impact fish larvae. The proposed "modernizations" to the existing salt water intake will have potentially significant adverse environmental impacts.
3. Section 2 suggests that the permitting and use of existing "Sea Chests" will be accomplished by the HBHRCD. This is "piecemeal" planning and splitting of environmental impacts in a way that CEQA does not allow.
4. The schedule of salt and fresh water intake infrastructure work is not documented.
5. Detailed information on marine protection measures (seasonal closure or variation in water intake volumes) have not been provided.
6. A more specific and detailed analysis is necessary to document or prevent adverse environmental effects. For example, the source of fish food used to grow exotic Atlantic salmon may adversely affect native fish in Humboldt Bay or the Pacific Ocean, and the

current iteration of the DEIR lacks specific information on how much and in what proportion forage fish protein will be obtained.

7. The DEIR fails to consider adverse impacts on the food chain for avian species as well. While Sec. 3.3.6 describes the potential impacts of individual sensitive or special status species, the DEIR overall does not adequately address how several of the issues above may have potentially significant adverse impacts on local bird species which thrive on Humboldt Bay's fish and invertebrates.

Thank you for the opportunity to provide these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Frank Fogarty", with a long, sweeping flourish extending to the right.

Frank Fogarty, President

CA North Coast Chapter, TWS