

McNamara, Cade

From: Tom peters <tpete@reninet.com>
Sent: Saturday, February 12, 2022 4:35 PM
To: CEQAResponses
Subject: comments on Nordic impact

These are my additional comments on the DEIR for the Nordic Farms proposed fish farm on the Samoa Peninsula. I have lived and fished in Humboldt bay for over 50 years and have a good idea of what lives there and what it requires. The following are only some of my major concerns.

1. The effluent pipe at Somoa is shared with several other entities for their treated sewage water. There must be a plan in case any of the pipeline users has trouble and exceeds limits. What happens to the fish if, for example, the Manila sewage treatment facility fails and contaminates the pipeline discharge? Does Nordic have to shut down? What happens to the fish?
2. What happens to the Manila sewage outfall if the Nordic operation fails or exceeds its limits. Does Manila have to shut down?
3. If the Nordic operation exceeds discharge limits, what happens to the fish while repairs are underway? Do they just kill them or try to use them in some way? What is the plan?
4. The same question applies to any serious power failure. True there are backup generators but what happens to the fish if they fail, possibly in an earthquake or serious tsunami?

There MUST be a plan for the fish.

Humboldt Bay is a nursery area for a wide variety of creatures, many quite small. Eggs, larvae. Various stages of miniscule growths are swimming all through the bay water. Many of these organisms filter bay water for their food (oysters!)

I am VERY concerned about the HUGE inflow from pumps drawing water from the bay and its impact on those creatures. True, many can be filtered, although what impact filtering has on them is unknown. But an example comes to mind that I am very familiar with. Herring spawn in Humboldt Bay in large numbers. Herring lay their eggs attached to available structures or eel grass. The males then broadcast their sperm into the water where it contacts the eggs. The sperm is extremely fine and looks like smoke in the water. There is no way to filter it out in any useful manner any more than you could filter cups of coffee out of the bay. If sperm laden water was being pulled out of the bay it could not fertilize the eggs and the herring would disappear. The same holds true for many other marine organisms. This must be closely studied BEFORE Nordic attempts to replumb our bay.

It is one thing to say you will closely monitor the outfall, it is quite another to be willing and able to do something about it if problems occur. Sorry to sound doubtful, but I've seen numbers fudged too many times when dollars are at stake. The consequences of problems with illegal or out of compliant discharge MUST be immediate and carefully monitored by independent agencies.

I believe the Nordic operation will have many unforeseen impacts on our bay and ocean. I've spelled out a few above. It is too large in scale and potentially too disruptive to the local waters. I do appreciate all their efforts to assure that fish do not escape but many other consequences can and probably will occur from their operation. Once this thing is built and in operation, the chance of making any significant changes are nil. Like the pulp mills before it, once it becomes a major economic force in the community it becomes difficult or impossible to control or stop.

Humboldt Bay is a precious and delicate resource. It has suffered much from development over the years. If this project is completed at the scale proposed, The Bay will only suffer more, along with the plants, animals, and birdlife that call it home.

I ask this project to at least scale back. Start with a smaller, less disruptive facility. Prove it works or does not and prove that it is compatible with the Bay environment BEFORE building a huge project that can't be controlled.

I have many more concerns but I have neither the time or energy here in my later years to digest and comment on the entire 1800 page document. In fact, creating such a lengthy document without good summaries appears to be a way to limit meaningful comment itself.

Hopefully that is not the case but it does make it difficult for the public to respond.

That concludes my remarks.

Thank You.

Thomas H. Peters

221 Dollison St.

Eureka, CA 95501

tpete@reninet.com