

## McNamara, Cade

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**From:** zeal Stefanoff <jwstefanoff@gmail.com>  
**Sent:** Sunday, February 13, 2022 12:20 AM  
**To:** CEQAResponses  
**Subject:** Comments on Aquafarm

The Dear Folks,

I am concerned about this project as a land owner of a salmonid bearing creek, a ocean beach user and a fisherman.

The project has the potential of being very odorous much like a hog farm and reaching Eureka, Arcata and all in between.

The project would be the largest in Humboldt County in decades. 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 DEIR 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.

Although its wastewater would have lower nitrogen concentrations than the effluent from antiquated municipal wastewater treatment plants around the bay, it would add to the existing nutrient load. It would also discharge warmer water with lower pH and salinity than the receiving waters. This combination has the potential to exacerbate the toxic algae blooms that have devastated the crab and clam fisheries in recent years.

Numerous impacts have not been adequately assessed in the DEIR, including energy demands, greenhouse gas emissions, the ocean discharge, and impacts to wildlife related to the bay intakes. We believe reasonable changes to reduce these impacts are achievable. To make sure Nordic commits to these changes, we are requesting the following modifications:

1. Potential effects should be modeled using ambient water quality data from ocean waters near the discharge point, rather than data taken in Humboldt Bay (approximately 3.5 miles south-southeast of the end of the ocean outfall pipe).
2. Levels of toxic algae should be monitored both pre- and post-project and compared to thresholds that would trigger protective actions *before* another toxic algae bloom leads to harmful levels of domoic acid.
3. An explicit requirement in the EIR that the project will, from day one of operations, be powered solely by renewable energy.
4. Additional onsite renewable energy production through more aggressive utilization of solar, including over parking areas.
5. What is worst case scenario of earthquake and tsunamis' incidents to the infrastructure and fish releases?
6. What happens to the product if disease break out.
7. How can you mitigate the use of antibiotics and it entering the discharge?
8. What effect on migrating salmonids entering Humboldt/Arcata Bay from the discharge?
9. During a major fish kill how will you deal with the product?

As an environmentalist, climate activist, and stakeholder, my goal is to make sure this project undergoes the highest level of scrutiny and is as least impactful as possible with beyond state of the art technology.

Jeffrey Stefanoff  
6164 Jacoby Creek Rd.  
Bayside, Ca 95524