

**From:** [Lina C Carro](#)  
**To:** [Planning Clerk](#)  
**Cc:** [Lina Carro](#)  
**Subject:** Nordic Aquafarms California, LLC; Coastal Development Permit and Special Permit Record Number PLN-2020-16698 (filed 10-05-20) Assessor's Parcel Number (APN): 401-112-021  
**Date:** Wednesday, July 27, 2022 11:30:48 AM

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To the Planning Department and Humboldt County Board of Supervisors,

Please do not approve this project! The proposed project's FEIR is inadequate and deficient. I am not a science professional but I am a longtime community member and Humboldt County resident who is deeply concerned about the approval of this project so my comments will summarize and refer to what I learned from listening to a review of the FEIR.

After listening to last night's [Public Affairs program \(Tuesday, July 26 at 5:30 pm\)](#) concerning the approval of the Nordic Aquafarms' mega-project to be permitted to operate in Humboldt County, I oppose the approval of this project as it is proposed in the FEIR. I urge you to spend 20 minutes listening to the data presented by the speakers on the program at Public Affairs before moving ahead to approve this project.

The first guest on the program was Alison Wily of Riparian Solutions and a board member of the Salmonid Restoration program who explored the science, rhetoric, and risk of this project. You may refer to her earlier comment letter on the DEIR for written details at [:https://humboldt.gov/DocumentCenter/View/104347/Willy-Alison-Riparian-Solutions-21822](https://humboldt.gov/DocumentCenter/View/104347/Willy-Alison-Riparian-Solutions-21822)

The second guest on the program was Dan Chandler of 350Humboldt who pointed out what a vast carbon footprint this project would have on a global scale, outside of its more local impacts on our small community.

Here is a summary of the existing concerns I share with these speakers about the project's final EIR document:

### **1) Rhetorical Response to DEIR comments**

The document does not delve into research to respond to the public's questions and comments on the DEIR. This includes my own comment letter on the DEIR.

### **2) Risks and Biosecurity**

As the project is written, Humboldt Bay ecology would be at high risk for native salmon as well as for countless other species who make Humboldt Bay their habitat due to new and emerging viruses the research in the FEIR does not cover. Moreover, there is no offer in the project FEIR to address testing for them. These emerging viruses came largely from Norway and more recently Iceland which could be introduced to Humboldt Bay fish.

There is also a risk from the emissions of glycophytes on fish feed and that effluent flow which would be carried on the current and the incoming tide would bring them back into Humboldt Bay. The company is taking measurements only at the outflow of the pipe.)

There is no provision for biosecurity for staff working at the farm.

### **Salt Water Removal from Humboldt Bay**

The overall impacts on the health of all species from removing **ten million gallons of water every day from Humboldt Bay** are not addressed

### **Fresh Water Removal from the Mad River**

The farm's need to remove **two and a half million gallons of freshwater every day from the Mad River** troubles me deeply. On a personal level, as a resident who works hard to conserve fresh water I receive from the Mad River, this one hits home. How can we, in times of such unprecedented drought, allow precious fresh water to be used by this private, for-profit corporation?

### **3) Energy Impact and Aquafarm Carbon Footprint**

This project proposes to use the same amount of energy that our largest two cities, Eureka and Arcata, combined. The capacity needed to run the entire operation has grown to 39.5 mega watts energy infrastructure and there are no facilities to support this. When these power sources are simply not available, this means that they will have to rely on using our existing energy sources. The project will demand this level of energy 24/7 which precludes much of it actually running on renewable energy.

Ultimately, this drain on Humboldt County's energy grid will make it very difficult for our county to convert our transportation and our buildings to electricity in the future. This is a huge concern to me.

Also, the Atlantic Salmon that will be grown by the farm will be fed other small fish (via fishmeal, etc.) that could have been eaten in their original form near their country of origin. According to Dan Chandler, this tallies to about 70,000-90,000 metric tons of greenhouse gas emissions from this fish feed that are not mentioned in the FEIR. Nordic Aquafarms is sidestepping this issue by not addressing it or offering mitigation. They should be more transparent about the carbon footprint that their entire aquafarm process will have on the planet.

### **4) Integrity and stability of the company**

There was a recent and sudden parting of the ways with the company's founders. We need to hear more about what happened to cause this. How can our community place our trust in such an unstable company to protect our community's best interests? We need to hear about these details before approving the project.

Thank you for considering my comments about this project.

Sincerely,  
Lina Carro

