

REDWOOD REGION AUDUBON SOCIETY

P.O. BOX 1054, EUREKA, CALIFORNIA 95502



July 26, 2022

Planning Commission
Humboldt County Courthouse
825 5th Street
Eureka CA, 95501

Subject: Comments on Nordic Aquafarms Samoa Peninsula Land-based Aquaculture Project
Final Environmental Impact Report

Dear Commissioners:

Our comments on February 15, 2022, May 21, 2021, and July 3, 2021, on the Draft Environmental Impact Report, Impact Statement, and Notice of Preparation, respectively, expressed our concerns regarding the seawater intake mitigation for marine life entrainment and impingement, fish food sourcing, and water quality.

Seawater Intake

We agree with the California Department of Fish and Wildlife in that the proposed mitigation for longfin smelt (LFS) continues to be mostly hypothetical and based on incorrect assumptions regarding the vulnerability of LFS to impingement. We also continue to be concerned about the potential for impingement and entrainment of other planktonic size biota that have not been fully evaluated in the DEIR or FEIR. **We therefore request that a full study on these issues be completed as a requirement of a permit to operate.**

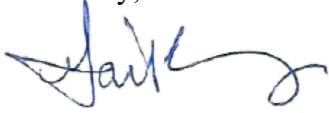
Fish Food

The response to comment 516-12 on third party certification the FEIR states “These certification standards also develop over time to adapt to current situations and challenges, it would therefore be premature to lock in the standards today; instead, NAFC will use the best available certification once in operation.” **We request that language required for the operating permit stipulate that third party certification of marine sources for fish food be the most protective of the marine environment.**

Hydrology and Water Quality

As indicated in comment letter 503, neither Trinidad Harbor nor the entrance to Humboldt Bay are indicative of conditions at the proposed point of wastewater discharge. The FEIR attempts to justify potential environmental impacts based on data from these two locations but fails to incorporate existing data that includes the point of discharge. **We believe this omission makes the FEIR deficient and request that all existing data be included in a supplement as a condition of FEIR approval.**

Sincerely,

A handwritten signature in blue ink, appearing to read "Gail Kenny", with a stylized flourish at the end.

Gail Kenny, President
Redwood Region Audubon Society

Copies:

Humboldt County Board of Supervisors

Humboldt County Supervisor-elect, Natalie Arroyo