

BLUE LAKE RANCHERIA

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June 6, 2022

Planning Director
Humboldt County Planning & Building Department
3015 H Street, Eureka, CA 95501
Via email to CEQAResponses@co.humboldt.ca.us

Re: Comments on Nordic Aquafarms Draft Environmental Impact Report (DEIR)

Dear Planning Director and Others This May Concern:

After detailed review of the Draft Environmental Impact Report (DEIR) prepared by Nordic Aquafarms, the Blue Lake Rancheria (BLR) is writing in general support of the project with the commitments made by Nordic Aquafarms to conduct certain continual monitoring efforts and support sustained community engagement on adaptive management overall as future impacts are encountered, and benefits realized. BLR is a federally recognized Native American tribal government located within Humboldt County. Creating, analyzing, and implementing sustainable solutions for the climate crisis - pairing climate mitigations with adaptations - is among BLR's top priorities.

As regions, we will need to try - and test - new ideas to avoid the worst impacts of the climate crisis, including changes to the way we source our food, and in particular, our protein. The Nordic Aquafarms project is a large-scale, first-of-its-kind land-based fish farm effort, which if approved will also remediate a legacy environmental hazard in our region that has persisted for the last several decades.

Governments and industry must work together to set strong regulatory safeguards to reduce greenhouse gas emissions within which economic enterprises can thrive. BLR sees the opportunity for a triple bottom line in this project: people, planet, and profit/reinvestment, in that order. At the same time, we will need to adaptively manage this large-scale industry so that it does not externalize costs or environmental hazards in the service of profit. Specifically, BLR recommends continual testing of the effluent discharged through the outfall pipe to ensure micro-organisms, toxins, and other harmful constituents do not evade the filtration system and create issues in the Pacific Ocean and related ecosystems. BLR also strongly recommends the use of zero emission energy and aggressive greenhouse gas reductions in Scopes 1, 2, and 3 applications, as a part of Nordic Aquafarms' operational risk reduction and marketing of their products as sustainable.

Sincerely,

A handwritten signature in blue ink that reads "Claudia Brundin". The signature is written in a cursive, flowing style.

Claudia Brundin
Chairperson

BEAR RIVER BAND of the ROHNERVILLE RANCHERIA

266 KEISNER RD LOLETA, CA 95551-9707

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May 23rd, 2022

Re. FEIR -Nordic Aquafarms Aquaculture Project

We are pleased to see that the proposed project will include substantial remediation and restoration efforts, and that the proponent has addressed some of the concerns regarding the screening techniques and qPCR (testing for specific viruses), frequency and level of testing for known and emerging viruses (Appendix D), energy usage, and need for detailed plans for timing of testing should a pathogen be detected.

The Bear River Band of the Rohnerville Rancheria Environmental and Natural Resources Department and the Tribal Historic Preservation and Cultural Programs Department are satisfied that the activities of the project do not appear to represent a source of significant impact (s) on cultural or natural resources. We respectfully request that standard inadvertent archaeological discovery protocols be in place for any ground disturbing activities of the proposed project, in accordance with: the Humboldt County General Plan policies CU-P1 through CU-P5; Section 7050.5(b) and (c) of the California Health and Safety Code; Sections 5097.94(k) and (i) and 5097.98(a) and (b) of the Public Resources Code (PRC); and Sections 15064.5(d-f) and 15126.4(b) (3) of the CEQA Guidelines. Thank you,

Hank Brenard, Director, ENR

Melanie McCavour, Director, THPO