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Press Release

The Humboldt Fishermen's Marketing Association, Inc, the Redwood Region Audubon Society Chapter, and 350 Humboldt have filed an appeal of the August 4th approval of the Nordic Aquafarm by the Planning Commission. The appeal will require the project EIR, the Coastal Development Permit and the Special Permit to be heard by the Humboldt County Board of Supervisors.

The three organizations describe fifteen ways in which the final EIR for the Nordic Aquafarm project fails to comply with CEQA standards. These defects fall into three general categories: a failure to adequately recognize several sources of greenhouse gases, a failure to recognize biological threats to the Humboldt Bay, and procedural irregularities – all of which violate CEQA environmental standards for new projects.

Converting 36,000 metric tons of fish feed into Atlantic Salmon will emit 80,000 to 191,000 metric tons of CO2 a year. Additionally, the aquafarm will operate 24/7 so at least 39,000 metric tons of CO2 will be emitted annually by the gas powered electricity used when renewables are not available. Another potential source of greenhouse gas emissions that was not analyzed in the EIR is leaks of refrigerants. Since the EPA estimates one supermarket emits 1,556 metric tons per year and Nordic will be devoting 48 gigawatt hours a year of electricity to cooling, it is likely emissions will be significant. The EIR does not recognize or analyze any of these greenhouse gas emissions.

Multiple threats of the project to the ecology of Humboldt Bay, the ocean and seabirds were inadequately or arbitrarily analyzed by the EIR. The EIR fails to fully evaluate the potential adverse environmental effects of using up to 10 million gallons per day of saltwater sourced from an as yet unpermitted intake diversion. It also fails to conduct a serious and rigorous analysis of alternatives for the seawater intake. It makes arbitrary determinations regarding risk to wild salmon populations, fails to adequately address domoic acid proliferation that may result from the project, and fails to address the sandlance spawning habitat in the vicinity of the saltwater intakes. The harvest of 36,000 metric tons of fish-based fish feed for the Nordic project will have direct negative effects on marine birds that feed on forage fish and krill, as well as undesirable fishery ecosystem impacts (citation).

Procedurally the EIR makes conclusions regarding threatened species prior to completing formal consultation on project effects on those species; it makes arbitrary determinations of "less than significant" effects prior to obtaining data, or documenting the factual basis for determinations; and the no project alternative is hopelessly biased by the failure to recognize all of the environmentally significant impacts we point out. Also, for the purpose of CEQA, this should be a single project rather than segregating permitting into three distinct parts: (1) the

onshore part of the Project and its effluent; (2) the saltwater intakes; and (3) the freshwater intakes. In segregated analysis the cumulative impact is not considered.

Finally, Nordic ignored environmental groups and others who repeatedly asked for a smaller project or one that adaptively manages build-out of the modular components of the project. Consequently, the project is a massive experiment by a company whose pilot program has only harvested two cohorts of salmon and is now no longer going to farm Atlantic Salmon. The Humboldt project is 17 times bigger (in terms of output) than the pilot. The largest land-based Atlantic Salmon farm in the world is only two-thirds the size of this proposal. It has had multiple fish die-offs, cooling failures, and lost $121 million in 2021. Attempting an aquafarm of this size is highly risky as problems increase with scale. Because the EIR did not consider the small-project or multiple-phase modular development these risks were not brought to the attention of decision-makers.

The actual appeal document is available HERE.

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