

CALIFORNIA COASTAL COMMISSION

ENERGY, OCEAN RESOURCES AND FEDERAL CONSISTENCY
455 MARKET STREET, SUITE 300
SAN FRANCISCO, CA 94105-2421
VOICE (415) 904-5200
FAX (415) 904-5400



Th9b

9-20-0488

November 16, 2023

Correspondence



California Coastal Commission
455 Market Street, Suite 300
San Francisco, CA 94105
EORFC@coastal.ca.gov
Sent via email

November 9, 2023

Re: November 2023 Agenda Item Thursday 9b - Application No. 9-20-0488 (Nordic Aquafarms California, LLC, Samoa)

Dear Chair Brownsey and Coastal Commissioners,

We submit these comments on Coastal Development Permit Application No. 9-20-0488 for Nordic Aquafarms California, LLC in Samoa (Humboldt County) on behalf of Humboldt Waterkeeper, Surfrider Foundation, Northcoast Environmental Center, and Environmental Protection Information Center.

Our organizations are writing in support of the staff recommendations for approval of Coastal Development Permit Application No. 9-20-0488 with Special Conditions. We have closely followed Nordic Aquafarms' proposed onshore aquaculture facility through various environmental review and permitting processes over the past several years, and we have advocated for various improvements to reduce impacts to coastal resources, many of which have been incorporated into the proposed project.

Coastal Development Permit Application No. 9-20-0488 would allow the ocean discharge of up to 10.3 million gallons per day of treated wastewater 1.55 miles offshore via an existing outfall that was originally built for a pulp mill. The bay intakes will be subject to a separate Coastal Development at a future hearing. The upland portion of the project, which will include demolition, remediation, and construction of new buildings and a modern stormwater system, was the subject of a Coastal Development Permit approved by Humboldt County (currently under appeal).

We strongly support Special Conditions 1-5, which require monitoring of coastal oceanography, water quality, and benthic habitats in the vicinity of the ocean outfall, including two years of baseline monitoring prior to any discharge and post-discharge monitoring at least two times a year during spring and summer to confirm that the discharge does not cause adverse impacts to natural ecological productivity.

Our primary concern with this project on the Samoa Peninsula between the Pacific Ocean and Humboldt Bay is that such facilities can contribute to nearby nutrient increases which can lead to toxic algal blooms that impact people and wildlife. The shoreline and coastal waters closest to the outfall, as well as Humboldt Bay, are recreational centers for our region, including surfing, fishing, and paddling, and supports Dungeness crab, our region's most economically viable remaining fishery. The Bay also supports the economically important commercial oyster industry as well as tribal, subsistence, and recreational shellfish harvesting.

We have taken special scrutiny with this project, since the discharge pipe being leveraged for the project once discharged highly toxic effluent from a pulp mill which was eventually abandoned after being sued for Clean Water Act violations. We find it critically important to monitor the discharge and effluent from this project to ensure that history is not repeated and the health of coastal waters, the nearby shoreline, and Humboldt Bay are protected and that the facility is in compliance with clean water standards.

We believe that the monitoring requirements described in the staff report, along with the five-year term of the CDP, annual monitoring reports, a five-year report, and subsequent reevaluation coinciding of the CDP coinciding with the renewal of the North Coast Regional Water Quality Control Board's NPDES permit will provide critical scientific information necessary to evaluate the effectiveness of the treatment and numeric modeling study, as well as quantitative information on any impacts on the marine ecosystem. Additionally, we request that these findings be made publicly accessible as they are received, and prior to determination from the Executive Director as to whether the discharge has caused any significant adverse environmental impacts or contributed to the occurrence of harmful algal blooms.

Thank you to your diligent staff for their recommendations on this project.

Sincerely,

Jennifer Kalt, Executive Director
Humboldt Waterkeeper
jkalt@humboldtwaterkeeper.org

Laura Walsh, California Policy Manager
Surfrider Foundation
lwalsh@surfrider.org

Tom Wheeler, Executive Director
Environmental Protection Information Center
tom@wildcalifornia.org

Caroline Griffith, Executive Director
director@yournec.org
Northcoast Environmental Center



Madrone Audubon Society

D I N C O R P O R A T E D

Submitted by email November 6, 2023

Th9B

November 6, 2023

Kate Huckelbridge, Ph.D., Executive Director .

Honorable Members

California Coastal Commission

455 Market St., Suite 300

San Francisco, CA 94105

Re: Comment – Nov. 16, Agenda Item 9B – Application No. 9-20-0488 (Nordic Aquafarms California, LLC, Samoa)

Dear Dr. Huckelbridge and Honorable Members of the Commission,

Madrone Audubon Society is a 501c3 nonprofit conservation organization, based in Sonoma County, with approximately 3000 members in Sonoma County and the San Francisco Bay Area. Madrone Audubon is the Sonoma County Chapter of National Audubon.

We submit herewith a comment on the proposed Nordic Aquaculture Project in Humboldt County, north of Sonoma County. We appreciate the diligence and expressed concerns of Redwood Region Audubon Society and other conservationists. Completion of an Environmental Impact Report for this proposal was essential. We understand appeals of Humboldt County governmental decisions are in process and are monitoring these.

What Is This?

The so-called aquaculture industry is modeled after animal factories, or “factory farming.” Aquaculture is part of big agribusiness. Such businesses have tremendously negative environmental impacts and do not represent the direction

*Madrone Audubon Society is qualified as an organization recognized under Section 501(c)(3) of the Internal Revenue Code.
Contributions are deductible by the donor under Section 170. Federal Tax I.D. 94-6172986*

P. O. Box 1911 • SANTA ROSA, CALIFORNIA 95402
<http://madroneaudubon.org>

we should be embarking upon as we necessarily and daily consider and address the climate crisis, with best decisions for food security, optimal nutrition, and healing our planet.

The California Coastal Commission is reviewing a proposal related to a fish factory similar to an animal factory. This is a CAFO, a Concentrated Animal Feeding Operation. The fish would be “cultivated” in an unnatural and highly stressful environment.

How Is This Being Considered?

Establishing a fish factory in the northern California coastal area is of deep concern to us. Framing your discussion and considerations in a context of the proposed factory now being smaller than the original proposal, along with selecting a different species other than salmonids to “cultivate,” would also be misplaced. Such an approach is similar to a developer who proposes a large residential or commercial development project, fully knowing the original proposal will likely be rejected and then reducing the size and scope of the original proposal to appear more acceptable while still creating significant negative environmental impacts.

Section 30231 of the California Coastal Act describes the Commission’s responsibilities for “Biological productivity; water quality,” in protecting our marine waters, marine life and coastal areas.

The Staff report on page 10 indicates, “Nordic proposes to discharge up to 10.3 MGD (million gallons of wastewater) daily.” The shorthand approach to quantifying the wastewater amount to be discharged is misleading. Your Commission is considering **daily discharge of 10,300,000 gallons.**

The Nordic proposal purports to “... include the proposed discharge through an existing ocean outfall structure, an onshore fish cultivation facility, and a seawater intake located on the shores of Humboldt Bay that would be operated by the Humboldt Harbor.” (p. 9, Staff report)

The project proposes to artificially raise “native” Yellowtail Kingfish, “approximately 3,000 metric tons of head on, gutted fish annually at the end of phase one and **15,000 metric tons** at full buildout...” (p. 10, Staff report). One metric ton equates to 2,200 pounds. 15,000 metric tons would be an annual quantity of **33,000,000 fish**. How many of these fish would die from inadequate

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oxygen, disease, overcrowding in a factory-produced setting? We consider Nordic is aware of the bottom line of profit for the amount of fish artificially “cultivated” in a factory setting, deaths versus fish that may survive.

What antibiotics, antimicrobial and other treatments would be administered to the crowded fish in contained tanks, being “cultivated?”

P. 2 of the Staff report on treated wastewater discharge: “The proposed discharge has the potential to adversely affect several coastal resources, including water quality and fisheries. However, a review of available information by Commission staff indicates that such effects would be unlikely. A dilution study commissioned by Nordic found that water quality targets for salinity, ammonia, and temperature would all be met within no more than five feet of the outfall pipe’s diffuser array. The dilution study also found that nitrates, the largest constituent in the discharge, would reach the same concentrations as background coastal waters fifty percent of the time in the immediate vicinity of the diffuser. In the worst-case scenario model, which shows the discharge plume extent estimated to occur one percent of the time, the discharge plume with elevated nutrients may extend at the water surface up to 1.5 km away from the diffuser array. Even under this worst-case scenario, however, the plume would not be expected to enter Humboldt Bay or other sensitive marine areas. Moreover, the rapid dilution of nutrients expected to occur in coastal waters would reduce the likelihood of eutrophication, hypoxia, and harmful algal blooms.”

The Staff report continues to discuss possible outcomes of additional negative impacts with Special Conditions and timelines to attempt to address those environmental disasters.

Not long ago, your Commission delayed a decision on a proposed UC-Santa Barbara turf field to replace a grass field. Commenters at that meeting offered strong concerns and substantial information related to detrimental impacts of turf fields. Commissioners acknowledged the benefit of a broader review, including the climate crisis context, before a decision on this proposal could be made and consistency with the California Coastal Act determined.

Here, with the Nordic Aquaculture proposal, Staff report and proposed conditions, we are extremely uncomfortable with the review and conclusions, including proposed monitoring to determine a level of harm that is highly likely to occur, if

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this proposal with conditions is approved. We believe adequate assessments and protections will be too late.

What is the Best Course to Consider?

Supporting this project equates to approving a new animal factory and all accompanying inhumane, unsafe and unsanitary conditions with the attempted justification of adding “food” to our food system.

In the climate crisis, repeatedly revealing to your Commission through weather, marine life and ocean events, and the definitive need to factor in uncertainties as decisions are made, we suggest this project not only carries risks that make it inconsistent with upholding the California Coastal Act, this is definitively the wrong direction to take in addressing food security and doing so in an environmentally responsible, humane and intelligent way, with a necessarily gentler imprint on our environment.

While we appreciate the Coastal Commission Staff’s ongoing efforts in all areas, we oppose this project and the Staff recommendation for approval with Conditions.

Sincerely,

Sincerely,

Susan Kirks

Susan Kirks, President
Madrone Audubon Society

susankirks@sbcglobal.net, 707-241-5548

cc: Redwood Region Audubon Society, PO Box 1054, Eureka, CA 95502



November 10, 2023

Attn: California Coastal Commission
Energy, Ocean Resources, and Federal Consistency Program
455 Market Street #300, San Francisco, CA 94105

Transmitted via email: *EORFC@coastal.ca.gov*

RE: Application No. 9-20-0488 (Nordic Aquafarms California, LLC, Samoa) - Preliminary Comments and Request for Comment Deadline Extension

Thank you for the opportunity to comment on application 9-20-0488 (Nordic Aquafarms California, LLC, Samoa). Save California Salmon is dedicated to policy change and community advocacy for Northern California's salmon and fish dependent people including tribes. We also represent commercial and recreational fishing. We support the fisheries and water protection work of the local communities, and advocate effective policy change for clean water, restored fisheries, and vibrant communities.

We are requesting an extension of the comment deadline on the basis that project information was only posted for the public a week ago, disabling efforts to analyze impacts to Tribal Beneficial Uses (TBUs), fish and wildlife.

Nordic Aquafarms is a large project with real risks and possible extreme cumulative impacts to both the Humboldt Bay and local coastline. As such, we have concerns in the following areas:

Impacts to Stormwater and Direct Conveyances

More time is needed to adequately analyze this topic of concern.

Impacts to Salmon and Crab Fisheries

More time is needed to adequately analyze this topic of concern.

Tribal Consultation

The staff report did not analyze racial equity impacts. There is a short section on tribal consultation that says the Bear River Band and Wiyot tribes were reached out to and that comments were received from the Wiyot Tribe, but they aren't posted. So it is unclear if the tribe's concerns were adequately responded to.

Dilution Study Not Available

Page 2 of the Staff Report states that a dilution study was commissioned by Nordic Aquafarms. The report *found that water quality targets for salinity, ammonia, and temperature would all be met within no more than five feet of the outfall pipe's diffuser array. The dilution study also found that nitrates, the largest constituent in the discharge, would reach the same concentrations as background coastal waters fifty percent of the time in the immediate vicinity of the diffuser. In the worst-case scenario model, which shows the discharge plume extent estimated to occur one percent of the time, the discharge plume with elevated nutrients may extend at the water surface up to 1.5 km away from the diffuser array. Even under this worst-case scenario, however, the plume would not be expected to enter Humboldt Bay or other sensitive marine areas. Moreover, the rapid dilution of nutrients expected to occur in coastal waters would reduce the likelihood of eutrophication, hypoxia, and harmful algal blooms.* However, this report has not been made available for review so external analysis has not been made possible.

Monitoring Concerns

Three years of monitoring is not enough to address the potential impacts of this project. In addition, there appears to be no chemical monitoring. Specifically, we have concerns for impacts from chemicals such as copper, formaldehyde, and bleach.

Again, thank you for the opportunity to comment on application 9-20-0488 (Nordic Aquafarms California, LLC, Samoa).

Sincerely,



Regina Chichizola

Executive Director
Save California Salmon
P.O. Box 142
Orleans, CA 95556

November 3, 2023

California Coastal Commission
P.O. Box 4908 Eureka, CA 95502-4908

I am writing on behalf of the California Aquaculture Association (CAA)ⁱ, a producer-supported association representing finfish, shellfish, and algae growers and seafood related businesses throughout California.

CAA would like to express its support for Nordic Aquafarms' Coastal Development Permit and Special Permit for their Samoa Peninsula Land-based Aquaculture Project (the Project).

The Food and Agriculture Organization's State of the World Fisheries report estimates that 93% of wild fish stocks worldwide are fished at maximum sustainable levelsⁱⁱ. Wild fisheries are managed well in California, but there are only so many fish that the ocean can sustainably produce. And with the world population projected to increase from the current 7.7 billion (2019) to 9.7 billion by 2050ⁱⁱⁱ, the demand for consumable proteins, including finfish, will only increase in the decades to come. Aquaculture is needed to supplement this demand.

The U.S. imports 80% to 90% of its seafood^{iv}, approximately 50% of which is produced by way of aquaculture^v. Consumers in this country are eating farmed fish already, it's just not coming from our own farmers. We need to be producing more seafood domestically, and Nordic Aquafarms' Project will do just that. This project will provide consumers with high quality, locally produced seafood, which is an excellent source of protein and essential nutrients.

Land-based aquaculture is a method of cultivating fish indoors within a controlled environment using recirculating aquaculture system (RAS), which enables the reuse of water, monitoring and implementation of ideal conditions throughout the lifecycle. The global aquaculture industry has witnessed the upscaling of innovation in water treatment technology to support land-based aquaculture farms, particularly in countries of Northern Europe and Scandinavia.

We applaud the commitments that Nordic Aquafarms has made to demonstrate that environmental stewardship is among their core values. The wastewater treatment facility that Nordic plans to construct onsite will be the highest standard of effluent treatment for any commercial aquaculture facility in the State. They have also committed to purchasing 100% non-carbon and/or renewable energy through regional energy suppliers and local sourcing to run the farm from the very beginning. Lastly, Nordic has committed to working with responsible feed companies who have demonstrated sustainability and GHG reduction programs with aggressive goals toward net-zero carbon footprints.

The continued development of our state's aquaculture industry will be vital to meet the growing demand for seafood in California and throughout the United States. Nordic Aquafarms' Project will create jobs and provide economic opportunities that are currently being lost to other states and countries.



CALIFORNIA AQUACULTURE ASSOCIATION

Nordic Aquafarms is furthering the much-needed development of finfish production and, as such, CAA fully supports their Project.

If you have any questions or would like to speak more about this, please contact me at info@caaquaculture.org or 916-246-6349.

Thank you,

Tony Vaught, President

ⁱ The California Aquaculture Association (CAA) is a producer-supported association representing finfish, shellfish, and algae growers and seafood related businesses throughout California since 1983. The CAA promotes commercial production of plants and animals in aquatic systems to satisfy the needs of consumers for wholesome products that are produced by sustainable means conserving California's land and water resources.

ⁱⁱ FAO, State of World Fisheries, p. 40.

ⁱⁱⁱ United Nations, Department of Economic and Social Affairs, World Population Prospects 2019, p.1.

^{iv} NMFS, Office of Science and Technology, Fisheries of the United States, 2017 Report, Current Fishery Statistics No. 2017, September 2018, p. 114.

^v Hauke L. Kite-Powell, Michael C. Rubino, and Bruce Morehead, "The Future of U.S. Seafood Supply," Aquaculture Economics & Management, vol. 17, no. 3 (August 2013), p. 229.

CAL POLY HUMBOLDT

Department of Fisheries Biology

707 826-4233 | PHONE

707 826-4060 | FAX

aquaculture@humboldt.edu | EMAIL

November/10/2023

Cassidy Teufel
California Coastal Commission

Dear Mr. Teufel,

I am Dr. Rafael Cuevas Uribe, an aquaculture professor at Cal Poly Humboldt. My job is to educate people about aquaculture, and I am writing this letter to support Nordic Aquafarms' project planned for the Samoa Peninsula.

The USA is the largest importer of seafood in the world (Figure 1). In 2021, the value of imports reached a record high of \$30 billion. Unfortunately, our local aquaculture production has been stagnant for the past 20 years. Our complicated and expensive regulatory burdens and the public's low familiarity with recirculating aquaculture systems have led us to depend on foreign products. Over 85% of the seafood that we consume is imported. California is the largest consumer of seafood in the United States. We can not rely any longer on imported seafood.

Nordic Aquafarms has demonstrated that they have the technology to produce seafood in a sustainable manner. They have been supportive of the education of future aquaculturists in the USA. They have demonstrated transparency, honesty, and inclusiveness. Please consider this letter of support as you review the outfall Coastal Development Permit.

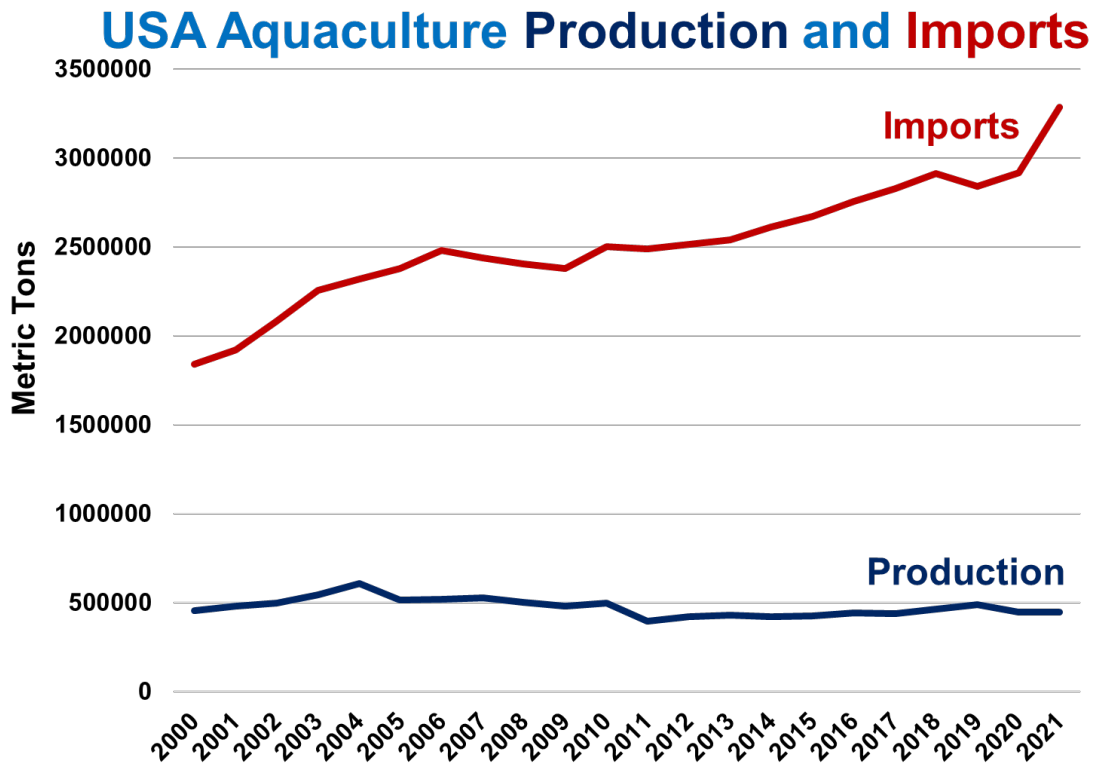


Figure 1. Aquaculture production in the USA (blue) versus seafood imported into the USA (red). More than 85% of the seafood that we consume is imported.

Sincerely,

Rafael Cuevas Uribe
Associate Professor
aquaculture@humboldt.edu



North Coast Fabricators

North Coast Fabricators is a Certified Women Owned Business.

Agenda Item Th9b

November 7, 2023

Chair, Vice Chair and Commissioners,

On behalf of **North Coast Fabricators**, I am pleased to write this letter in support of Nordic Aquafarms' project planned for the Samoa Peninsula. Nordic Aquafarms focuses on fish welfare and environmental sustainability, and they employ proprietary recirculating aquaculture systems (RAS). The facility will employ industry-leading wastewater treatment systems ensuring only the highest quality effluent will be discharged. The land-based RAS farm is a key solution in contributing to increasing domestically produced seafood supply without leaving a material environmental footprint.

The Nordic Aquafarms' project will provide many community benefits, including clean-up of a long-abandoned site containing hazardous materials, abandoned buildings, and industrial debris. The project will also stimulate economic activity and provide a wide range of employment opportunities. In addition to what Nordic will directly contribute to our local economy, the Nordic project will be a draw for other aquaculture businesses, thereby increasing economic prosperity and employment opportunities for our region.

Nordic Aquafarms has been actively engaging in our community through public meetings, site tours and stakeholder outreach. Through this engagement Nordic has voluntarily agreed to many changes and improvements to the project beyond regulatory requirements. Nordic is also working closely with College of the Redwoods and with Cal Poly Humboldt to ensure a steady pipeline of local qualified professionals. Nordic has also worked with the Humboldt County Office of Education to introduce information to students about careers in aquaculture and to offer support in classroom educational programs.

The Nordic team has gone to great lengths to be transparent, inclusive, and comprehensive throughout their permitting efforts. We are confident that they will be a benefit to our local economy as well as to our community. Please take this letter of support into consideration as you review the outfall Coastal Development Permit before your Commission. We hope you agree with your staff recommendation and approve the CDP as conditioned.

Sincerely,

Paula E. Crowley

President/Owner



Agenda Item Th9b

11/7/2023

Chair, Vice Chair and Commissioners,

On behalf of Bay Tank & Boiler Works dba BT Metals, I am pleased to write this letter in support of Nordic Aquafarms' project planned for the Samoa Peninsula.

The Nordic Aquafarms' project will provide many community benefits, including clean-up of a long-abandoned site containing hazardous materials, abandoned buildings, and industrial debris. The project will also stimulate economic activity and provide a wide range of employment opportunities. In addition to what Nordic will directly contribute to our local economy, the Nordic project will be a draw for other aquaculture businesses, thereby increasing economic prosperity and employment opportunities for our region.

The Nordic team has gone to great lengths to be transparent, inclusive, and comprehensive throughout their permitting efforts. We are confident that they will be a benefit to our local economy as well as to our community. Please take this letter of support into consideration as you review the outfall Coastal Development Permit before your Commission. We hope you agree with your staff recommendation and approve the CDP as conditioned.

Sincerely,

Lee Cunningham, CEO

A handwritten signature in black ink that reads 'Lee Cunningham'. The signature is fluid and cursive, with the first name 'Lee' being particularly prominent.

BT Metals,
825 W 14th Street
Eureka CA 95501
707-443-0934
lee@btmetals.com



Serving Agriculture Since 1913
5601 S Broadway, Eureka, CA 95503

November 7, 2023

RE: Agenda Item Th9b

Dear Chair, Vice Chair, and Commissioners,

On behalf of the Humboldt County Farm Bureau, I am pleased to write this letter in support of Nordic Aquafarms' Samoa Peninsula project. Nordic Aquafarms' focus on fish welfare and environmental sustainability is in line with HCFB standards and goals. Their land-based recirculating aquaculture system will increase domestically produced seafood benefit our economy and community.

We are also pleased that Nordic Aquafarms will be conducting a cleanup of the long-abandoned pulp mill site, removing hazardous materials and debris while stimulating the local economy. Their dedication to education and their work with the College of the Redwoods, Cal Poly Humboldt, and the Humboldt County Office of Education aligns with HCFB values.

HCFB has appreciated the efforts of Nordic Aquafarms' public outreach and inclusion through every step of the permitting process. Their transparency and accessibility have been refreshing. HCFB fully supports agriculture and aquaculture projects that promote our region's farmers and ranchers, and the Ag Industry, and offer an educational component that helps to develop positive interactions with our neighbors.

The Samoa Peninsula project will be a great benefit to Humboldt's economy and community. Please consider this letter of support as you review the outfall Coastal Development Permit before your Commission. Please approve the CDP as conditioned and as your staff has recommended.

Sincerely,

A handwritten signature in black ink that reads 'Joseph Alexandre'.

Joseph Alexandre

President

Humboldt County Farm Bureau

.....

P.O. BOX 3553
EUREKA, CA 95503
(707) 445-9006 PHONE
(707) 443-1363 FACSIMILE

POWELL CONCRETE PUMPING

Agenda Item Th9b

November 8, 2023

Chair, Vice Chair and Commissioners,

On behalf of **Powell Concrete Pumping**, I am pleased to write this letter in support of Nordic Aquafarms' project planned for the Samoa Peninsula. Nordic Aquafarms focuses on fish welfare and environmental sustainability, and they employ proprietary recirculating aquaculture systems (RAS). The facility will employ industry-leading wastewater treatment systems ensuring only the highest quality effluent will be discharged. The land-based RAS farm is a key solution in contributing to increasing domestically produced seafood supply without leaving a material environmental footprint.

The Nordic Aquafarms' project will provide many community benefits, including clean-up of a long-abandoned site containing hazardous materials, abandoned buildings, and industrial debris. The project will also stimulate economic activity and provide a wide range of employment opportunities. In addition to what Nordic will directly contribute to our local economy, the Nordic project will be a draw for other aquaculture businesses, thereby increasing economic prosperity and employment opportunities for our region.

Nordic Aquafarms has been actively engaging in our community through public meetings, site tours and stakeholder outreach. Through this engagement Nordic has voluntarily agreed to many changes and improvements to the project beyond regulatory requirements. Nordic is also working closely with College of the Redwoods and with Cal Poly Humboldt to ensure a steady pipeline of local qualified professionals. Nordic has also worked with the Humboldt County Office of Education to introduce information to students about careers in aquaculture and to offer support in classroom educational programs.


The Nordic team has gone to great lengths to be transparent, inclusive, and comprehensive throughout their permitting efforts. We are confident that they will be a benefit to our local economy as well as to our community. Please take this letter of support into consideration as you review the outfall Coastal Development Permit before your Commission. We hope you agree with your staff recommendation and approve the CDP as conditioned.

.....

POWELL CONCRETE PUMPING

November 8, 2023
Page 2

Sincerely,



Gerald Powell
Powell Concrete Pumping
P. O. Box 3553
Eureka, CA 95502
707 445-9006



November 9, 2023

California Coastal Commission
Via Email to Cassidy.Teufel@coastal.ca.gov

Dear Chair, Vice Chair and Commissioners,

On behalf of the Greater Eureka Chamber of Commerce, I am pleased to write this letter in support of Nordic Aquafarms' project planned for the Samoa Peninsula, and urge you to approve their Coastal Development Permit.

The Nordic Aquafarms project will provide many community benefits, including clean-up of a long-abandoned site containing hazardous materials, abandoned buildings, and industrial debris. The project will also stimulate economic activity and provide a wide range of employment opportunities. In addition to what Nordic will directly contribute to our local economy, the Nordic project will be a draw for other aquaculture businesses, thereby increasing economic prosperity and employment opportunities for our region.

We have been impressed with how Nordic Aquafarms has been actively and diligently engaging in our community through public meetings, site tours, and stakeholder outreach. Through this engagement Nordic has voluntarily agreed to many changes and improvements to the project beyond regulatory requirements. Nordic is also working closely with College of the Redwoods and with Cal Poly Humboldt to ensure a steady pipeline of local qualified professionals. Nordic has also worked with the Humboldt County Office of Education to introduce information to students about careers in aquaculture and to offer support in classroom educational programs.

The Nordic team has gone to great lengths to be transparent, inclusive, and comprehensive throughout their permitting efforts. We are confident that they will be a benefit to our local economy as well as to our community. Please take this letter of support into consideration as you review the outfall Coastal Development Permit before your Commission. We hope you agree with your staff recommendation and approve the CDP as conditioned.

Sincerely,



Nancy Olson
President | CEO

November 9, 2023

Chair, Vice Chair and Commissioners,

On behalf of **Operating Engineers Local #3 District 40 Eureka**, I am pleased to write this letter in support of Nordic Aquafarms' project planned for the Samoa Peninsula. Nordic Aquafarms focuses on fish welfare and environmental sustainability, and they employ proprietary recirculating aquaculture systems (RAS). The facility will employ industry leading wastewater treatment systems ensuring only the highest quality effluent will be discharged. The land-based RAS farm is a key solution in contributing to increasing domestically produced seafood supply without leaving a material environmental footprint.

The Nordic Aquafarms' project will provide many community benefits, including clean-up of a long-abandoned site containing hazardous materials, abandoned buildings, and industrial debris. The project will also stimulate economic activity and provide a wide range of employment opportunities. In addition to what Nordic will directly contribute to our local economy, the Nordic project will be a draw for other aquaculture businesses, thereby increasing economic prosperity and employment opportunities for our region.

Nordic Aquafarms has been actively engaging in our community through public meetings, site tours and stakeholder outreach. Through this engagement Nordic has voluntarily agreed to many changes and improvements to the project beyond regulatory requirements. Nordic is also working closely with College of the Redwoods and with Cal Poly Humboldt to ensure a steady pipeline of local qualified professionals. Nordic has also worked with the Humboldt County Office of Education to introduce information to students about careers in aquaculture and to offer support in classroom educational programs.

The Nordic team has gone to great lengths to be transparent, inclusive, and comprehensive throughout their permitting efforts. We are confident that they will be a benefit to our local economy as well as to our community. Please take this letter of support into consideration as you review the outfall Coastal Development Permit before your Commission. We hope you agree with your staff recommendation and approve the CDP as conditioned.

Sincerely,



Jeff Hunerlach, District Representative

Operating Engineers Local #3 District 40

From: [Supriya Samuel](#)
To: Energy@Coastal
Cc: [David Seeley](#)
Subject: Public Comment on November 2023 Agenda Item Thursday 9b - Application No. 9-20-0488 (Nordic Aquafarms California, LLC, Samoa)
Date: Tuesday, October 31, 2023 7:07:45 AM

Members of the California Coastal Commission,

On behalf of Skretting North America, I am pleased to write this letter in support of Nordic Aquafarms' project planned for the Samoa Peninsula.

As an organization, Skretting's purpose is feeding the future and ensuring the responsible and sustainable production of feed in the aquaculture industry. Skretting is dedicated to fostering sustainable aquaculture practices that align with environmental stewardship and economic growth. The Nordic Aquafarms' initiative encapsulates these values and represents a significant step forward in advancing the aquaculture industry. Nordic Aquafarms focuses on fish welfare and environmental sustainability, and they employ proprietary recirculating aquaculture systems (RAS) with patented technology. The end-results are modules ready for land-based RAS farming - and a key solution in contributing to increasing domestically produced seafood supply without leaving a material environmental footprint.

The Nordic Aquafarms' project will provide many community benefits, including clean-up of a long abandoned site containing hazardous materials, abandoned buildings, and industrial debris. The project will also stimulate economic activity and provide a wide range of employment opportunities. In addition to what Nordic will directly contribute to our local economy, the Nordic project will be a draw for other aquaculture businesses, thereby increasing economic prosperity and employment opportunities for our region. The Nordic team has gone to great lengths to be transparent, inclusive, and comprehensive throughout their permitting efforts. We are confident that they will be a benefit to our local economy as well as to our community.

Please take this letter of support into consideration as you review the appeals of the Terrestrial Coastal Development Permit and the two additional Coastal Development Permits before your Commission.

Sincerely,
David Seeley
Commercial Director, Skretting North America

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11/10/23

Agenda Item Th9b

Chair, Vice Chair and Commissioners,

As a Humboldt County Real Estate Broker, I am pleased to write this letter in support of Nordic Aquafarms' project planned for the Samoa Peninsula.

The Nordic Aquafarms' project will provide many community benefits, including clean-up of a long-abandoned site containing hazardous materials, abandoned buildings, and industrial debris. The project will also stimulate economic activity and provide a wide range of employment opportunities.

In addition to what Nordic will directly contribute to our local economy, the Nordic project will be a draw for other aquaculture businesses, thereby increasing economic prosperity and employment opportunities for our region.

As President of Rotary Club of Eureka, I can attest that Nordic Aquafarms has been actively engaging in our community through public meetings, site tours and stakeholder outreach. Through this engagement Nordic has voluntarily agreed to many changes and improvements to the project beyond regulatory requirements.

Nordic is also working closely with College of the Redwoods and with Cal Poly Humboldt to ensure a steady pipeline of local qualified professionals. Nordic has also worked with the Humboldt County Office of Education to introduce information to students about careers in aquaculture and to offer support in classroom educational programs.

Nordic Aquafarms focuses on fish welfare and environmental sustainability, and they employ proprietary recirculating aquaculture systems (RAS). The facility will employ industry leading wastewater treatment systems ensuring only the highest quality effluent will be discharged. The land-based RAS farm is a key solution in contributing to increasing domestically produced seafood supply without leaving a material environmental footprint.

The Nordic team has gone to great lengths to be transparent, inclusive, and comprehensive throughout their permitting efforts. I am confident that they will be a benefit to our local economy as well as to our community. Please take this letter of support into consideration as you review the outfall Coastal Development Permit before your Commission. I hope you agree with your staff recommendation and approve the CDP as conditioned.

Sincerely,

Annalise von Borstel
Broker Associate
DRE #02020546
707-616-2548