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Board of Supervisors
County of Humboldt
825 5th St
Eureka, CA 95501

May 19, 2017

Re: Request for Extension of Draft EIR Public Input Period

Dear Supervisors,

Humboldt Coalition for Property Rights is pleased to have the opportunity to submit comments on the latest version of the Draft Environmental Impact Report. Our goal remains to assist the County in creating a document that both complements and complies with the General Plan.

Unfortunately, we feel that the original time frame provided for public comment on the newly released draft is insufficient for various groups to analyze and return meaningful feedback. In addition, no announcement has yet been made regarding the dates for any public hearings on the Draft EIR. In the interest of creating a document that balances the many issues relating to Humboldt County's prosperous future, we request that the Board consider extending the public input period to July 9th, 2017.

HUMCPR understands, as does the entire Humboldt Community, that the General Plan Update process has stretched far beyond the original target date for completion. However, a short extension of time relative to the greater scope of the General Plan Update Process would not only be appreciated, but of benefit to the community as a whole.

Thank you for considering our request, and for your diligence in ensuring the success of the General Plan Update in all phases.

Best regards,

A handwritten signature in black ink, appearing to read "Alec Ziegler". The signature is fluid and cursive, with the first name "Alec" being more prominent than the last name "Ziegler".

Alec Ziegler
Executive Director
Humboldt Coalition for Property Rights



May 29, 2017

John Miller
County of Humboldt
Planning and Building Department
3015 H Street
Eureka, CA 95501
via email: gpu@co.humboldt.ca.us
cc: mrichardson@humboldt.ca.us

RE: Comments on Proposed Revised Draft Environmental Impact Report (RDEIR) for Draft Humboldt County General Plan

Mr. Miller:

The Coalition for Responsible Transportation Priorities (CRTP) is an organization whose mission is to promote transportation solutions that protect and support a healthy environment, healthy people, healthy communities and a healthy economy on the North Coast of California. CRTP appreciates the opportunity to comment on the proposed Revised Draft Environmental Impact Report (RDEIR) for the County's General Plan Update (GPU). Our comments are as follows:

Level of Service & Vehicle Miles Traveled

The use of vehicular Level of Service (LOS) as a primary tool for assessing transportation impacts of the GPU leads is extremely problematic. LOS is an outdated metric which is increasingly recognized as leading to unintended consequences when used to measure the impacts of development and to determine appropriate mitigation. One researcher succinctly summarizes: "The use of LOS is often criticized for its bias towards automobiles at the expense of bicycling, transit, and walking, and it complicates smart growth or compact development."¹ We agree with this criticism.

Furthermore, the use of LOS and other measures of automobile congestion to assess transportation impacts leads to mitigation measures which add automobile capacity to the road system. This tendency can be seen in the list of circulation system improvements in Table 3.5-6 of the RDEIR, which consists of additional roadway construction projects meant to relieve congestion. However, there is a growing consensus in transportation planning that adding capacity induces new travel and does not reduce congestion. We highly recommend that the

¹ Henderson, Jason. 2011. "Level of service: the politics of reconfiguring urban streets in San Francisco, CA." Journal of Transport Geography 19(6): 1138-1144.



literature on induced travel be carefully reviewed and considered. A recent policy brief for the National Center for Sustainable Transportation, appropriately titled “Increasing Highway Capacity Unlikely to Relieve Traffic Congestion,” contains a concise summary.²

The fact that the RDEIR considers “unacceptable LOS on roadways in the County” (Impact 3.5.3.2) to be a potentially significant impact of the GPU leads to counterproductive and internally inconsistent mitigation measures. Other than some Transportation Demand Management (TDM) strategies which the RDEIR itself admits would be difficult to implement effectively (p.3.5-21), these mitigation measures are designed to decrease congestion—i.e., increase speed of travel—by adding capacity, and will therefore induce additional vehicle miles traveled (VMT). This is an inevitable result of any project which decreases congestion by adding capacity, because the increased speed of travel resulting from such projects is what actually induces additional VMT.³ Meanwhile, increased VMT is considered a significant and unavoidable impact of the GPU. This internal inconsistency within the RDEIR should be addressed by replacing LOS with VMT as the primary vehicular impact measure.

The RDEIR shows that Humboldt County already has a high VMT per capita and that the GPU will exacerbate this problem. Tables 3.5-4a and 3.5-4b project VMT to increase at nearly twice the rate of population increase through 2040, and at nearly three times the rate in the near term (through 2028). At p.3.5-19, the RDEIR attributes not only current high VMT but future disproportionate VMT growth to “already established auto-oriented land use patterns.” However, this defies common sense. Existing land use patterns influence but do not dictate the pattern of future development—that is in large part the purpose of the GPU. Similarly, there is no fixed correlation between “levels of development” and VMT, as implied on p.3.5-19 of the RDEIR. Rather, it is the type and pattern of development which determines the impacts on VMT.

In this case, a review of the GPU’s proposed land use maps and circulation system improvements make it clear that increased VMT will be the result of growth planned largely for the outskirts of population centers—in other words, sprawl. But instead of proposing to mitigate increased VMT by modifying the land use planning in the GPU which causes it, the only proposed mitigation measure which even mentions land use limits itself to the consideration of

² Handy, Susan. October 2015. “Increasing Highway Capacity Unlikely to Relieve Traffic Congestion.” National Center for Sustainable Transportation. Available online at http://www.dot.ca.gov/newtech/researchreports/reports/2015/10-12-2015-NCST_Brief_InducedTravel_CS6_v3.pdf.

³ Cervero, Robert. 2003. “Road Expansion, Urban Growth, and Induced Travel: A Path Analysis.” *Journal of the American Planning Association* 69(2): 145-163.



future land use decision making. In other words, the RDEIR adopts an aspirational and largely unenforceable mitigation measure in place of a concrete and meaningful one.

Additionally, Proposed GPU Policy C-P5, establishing a minimum LOS for county roadways, is likely to ensure additional capacity increases and thus VMT increases for the life of the General Plan. An effective mitigation measure for increased VMT would be removal of Policy C-P5.

VMT is used as a “measure of congestion” in the RDEIR (p.3.5-20) and the discussion of VMT impacts beginning at p.3.5-18 is largely limited to congestion, but it is a much more meaningful indicator than that. The California Governor’s Office of Planning and Research (OPR) is currently in the process of implementing SB 743 (2013) by replacing LOS in the CEQA Guidelines with VMT. As OPR notes in its latest proposal, “vehicle miles traveled directly relates to emissions of air pollutants, including greenhouse gases, energy usage, and demand on infrastructure, as well as indirectly to many other impacts including public health, water usage, water quality and land consumption.”⁴ While the amendments to the CEQA Guidelines are not yet in effect, the current draft and supporting analysis are instructive, and it would behoove the RDEIR to follow the draft to the greatest extent possible.

In sum, the RDEIR should shift its focus away from LOS impacts. Further, the conclusion that increased VMT is an unavoidable impact of the GPU is not supportable. Reasonable mitigation measures which modify the GPU’s proposed policies, land use maps and circulation improvements while still accommodating population growth and achieving the GPU’s other goals could effectively mitigate VMT increases and must be adopted, as opposed to the speculative and unenforceable mitigation measures currently proposed.

Active Transportation & Transit

In summarizing the benefits and costs of different transportation modes, the RDEIR lists only “travel time, effort, convenience, and expense” (p.3.5-1), leaving out such critical considerations as safety, health, and greenhouse gas (GHG) emissions. It is thus perhaps unsurprising—but nevertheless unacceptable—that modes which may take more time but which promote greater health and safety and lower GHG emissions such as walking, bicycling and transit are given substantially less serious consideration than automobiles in the RDEIR. For example, the list of “issues affecting the County road system” (p.3.5-2) does not include anything about the capacity, safety or effectiveness of the road system for non-vehicular users. This is despite the fact that the document discusses in some detail how deficient the County’s

⁴ Governor’s Office of Planning and Research. January 2016. Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA. Available online at https://www.opr.ca.gov/docs/Revised_VMT_CEQA_Guidelines_Proposal_January_20_2016.pdf.



current bicycle and pedestrian infrastructure is, and the County's high rate of serious accidents involving bicyclists and pedestrians is also separately identified and discussed (p.3.5-12).

Furthermore, while vehicular travel impacts are extensively and quantitatively measured and discussed, and the GPU's proposed Policy C-P25 directs the County to adopt objective bicycle and pedestrian LOS/Quality of Services standards for County roads, the RDEIR makes no attempt to use any such standards to identify or measure the GPU's impacts on active transportation.

Without such objective measures, it is unclear how the RDEIR can come to conclusions such as that the GPU would increase walking and bicycling trips (p.3.5-31). It is important to note, however, that since the RDEIR *does* show that the GPU will result in increased vehicular trips regardless of whether bicycle and pedestrian trips will increase, the "hazards to roadway users" identified at this point in the RDEIR are real. Vehicles are the primary type of roadway users which pose a safety hazard.

In fact, the increase in vehicle trips and VMT creates a serious risk of decreased safety for all roadway users and a significant impact under CEQA. The RDEIR concludes on p.3.5-33 that safety impacts would be less than significant on the basis of the GPU's proposed goals and policies to promote safe multimodal transportation and encourage better design for bicycle, pedestrian and transit infrastructure. However, these aspirational policies do not outweigh the safety threat of additional VMT. Furthermore, the GPU's prioritization of the convenience of vehicular road users over the safety of non-vehicular road users is made clear by the use of the vague and permissive words "should" and "if possible" in proposed Policy C-P5, which states that road improvements to address congestion "should not adversely affect Level of Service and/or Quality of Service for other modes of transportation, if possible." This analysis applies equally to the RDEIR's conclusion that impacts to the performance or safety of bicycle, transit and pedestrian facilities will be less than significant.

In sum, the RDEIR must provide greater attention and analysis to non-vehicular transportation impacts. Furthermore, conclusions that the roadway safety and multimodal safety and performance impacts of the GPU are less than significant are not supportable and must be revisited.

Outdated Analysis and Trucking Impacts

The GPU process has taken many years, and we understand the difficulty of keeping the analyses in the RDEIR up to date. Nevertheless, it is not acceptable for the RDEIR to rely on documents and analyses which are substantially outdated and reflect conditions which no longer prevail. For example, the RDEIR explicitly relies on a reports from 2002 and 2008 to describe "existing transportation system conditions" (p.3.5-1). At p.3.5-5, the RDEIR also relies



on the County's 2008 Regional Transportation Plan (RTP) for a list of "regionally significant streets and roadways," despite the fact that the RTP was completely overhauled in 2014. Characterizing current conditions based on documents which are 15 years old and 9 years old, respectively, and categorically out of date, simply cannot lead to supportable impact assessment.

One glaring example of outdated analysis is the claim that Humboldt County is "dependent on logging and heavy commercial truck traffic to sustain its economy" (p.3.5-5). While logging and truck transportation still play a role in the local economy, the County can no longer be said to depend on them. The most recent Census data (2015) show that the entire forestry & agriculture sector provides only 2.3% of the County's payroll and 1.6% of its employment. Even adding this sector to manufacturing, wholesale, transportation and warehousing—the other main industries dependent on heavy trucks—produces only 16% of the payroll and 13% of the employment.

The RDEIR recognizes that "a key concern for the County is the impact of heavy truckloads on deteriorating County roads" (p.3.5-9), but provides no analysis of the GPU's impact on truck traffic or County road maintenance and repair. Indeed, the word "truck" appears only once in the entire Section 3.5.3 on transportation impacts and mitigation measures, and there is no discussion at all of the GPU's impacts on efforts to maintain and repair County roads. This lack may be partly explained by the incorrect assumption that the County is still heavily dependent on industries like logging—and that therefore there is no reasonable way to limit or control heavy truck traffic. Regardless, the RDEIR must be amended to include an analysis of truck traffic and maintenance/repair impacts, along with any needed mitigation.

Thank you for your consideration of our comments.

Sincerely,

Colin Fiske
Campaign Coordinator
Coalition for Responsible Transportation Priorities
colin@transportationpriorities.org

PO Box 898
Blue Lake, CA 95525
June 9, 2107

County of Humboldt
Humboldt County Planning and Building Department
Michael Richardson, Supervising Long Range Planner
mrichardson@co.humboldt.ca.us

RE: Public Comment on Revised Draft Environmental Impact Report (SCH# 2007012089 dated April 19, 2017)

1. What is the real impact of the County negligently not upholding the 1984 version of the Constitution? What will the impact be with this one and all of its supposed mitigations (when the County doesn't enforce its policies, standards, and implementation measures)?
2. What is the real impact to the draft EIR information and conclusions by using reports and reviews that are old (some written over a decade ago)?
3. What is the real impact when the County is known for its culture of lawlessness (individuals not following the laws and no one filing formal complaints – by the way, where can one find the County's complaint form and information)?
4. Housing: New Home Construction (p 2-5) – does this include all of the illegal building and illegal subdivisions (and that haven't been abated and have only increased)?
5. Population Growth: (p 2-6) – does this include the full- and part-time people related to the marijuana industry (that has exploded over the last decade and that will increase with the new Humboldt laws)?
6. How does this GPU's guiding principles (p 2-14) "preserve and enhance ...and the quality of life," have a "...balance approach to protect natural resources..." " ...utilize common sense" particularly in the Titlow Hill area where the County has known numerous illegal activities for decades and has yet to abate them (notices of nuisance were sent out for some, but not all and now there are possibly only three families in the area who live there legally and who are not growing marijuana) and where proposed land use / zoning / marijuana growing changes will only allow more negative impact to those families?
7. Where is the Titlow Hill area (p 3.2-17 and 18)? The County did extensive research and reporting in relationship to its lawsuit against Bareilles. County even states that in Schmook and Villa that nothing abated.
8. How were the Redwood Creek housing units calculated (p 3.7-38)? Projected legal housing only? If yes, then the quantity is way too low and there will be no addresses for emergency services, nor accessible roads or driveways.
9. What are the real impacts to air quality (p 3.12-2) where all of the surrounding roads are dirt and there are numerous illegal subdivisions (Titlow Hill area)?
10. How can the County make certain assertions about air quality when it has no monitoring systems in eastern Humboldt (p 3.12-3) where the sky becomes dark and the air crunchy when there are forest fires and everything near dirt roads becomes covered with dust?
11. Why are farming operations, off-road equipment, etc. listed multiple times with different numbers in Table 3.12-3. Annual PM10 emissions estimated percent contribution by source (p 3.12-5)?
12. How can the assumptions about the daily activity on unpaved roads be true (p 3.12-6) when areas where there are marijuana growing (activities go through fall, increase when their trimmers come, and all of them go back and forth / back and forth along the roads multiple times a day and night)?
13. What does the County think about having odors (especially marijuana) for visitors and legal residents (p 3.12-7)? What is the cost to property owners if they are surrounded for miles by marijuana growers/processors? What is the negative impact on their property rights and ability to enjoy their own

properties (especially when the problems did not exist when their properties were purchased)? The County also claims that it has “unknown” odor causing sites (p 3.12-16), but they are well aware of thousands of marijuana growing and production sites.

14. How does “Reduce Length and Frequency of Vehicle Trips,” (p 3.13.-19) happen when the County is proposing to increase the quantity of parcels, number of businesses, etc. in unincorporated areas (and farther from the coast)? Here and elsewhere, where is the County going to come up with the money to implement and support these activities (the County already says that they don’t have resources for the current laws on the books)?
15. What laws does the County have or propose to mitigate light pollution that can be seen for miles and negatively impact a person’s ability to enjoy the night sky and negatively impact wildlife (p 3.16-4)? Just in the last year, there are several new and large greenhouses just in the Titlow Hill area.

There are over a hundred more pages to read and review (out of the 582 total), so I’m going to let my general statements at the beginning of this public comment stand for the rest of the pages. It would be meaningful to understand how many public comments (separated by general public, government agencies, legal entities, real estate/development businesses, etc.) continue to be participate in this process since it has be going on for over a decade (and how this compares to other counties).

Sincerely,

Marisa D’Arpino



EDMUND G. BROWN JR.
GOVERNOR

June 8, 2017

STATE OF CALIFORNIA
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

Michael Richardson
Humboldt County Planning Division
3015 H Street
Eureka, CA 95501

Subject: Humboldt County General Plan Update
SCH#: 2007012089

Dear Michael Richardson:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on June 7, 2017, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2007012089
Project Title Humboldt County General Plan Update
Lead Agency Humboldt County

Type EIR Draft EIR

Description The project consists of updating the Humboldt County General Plan (referred to as the proposed General Plan Update or GPU for purposes of this EIR). A complete project description is in chapter 2 of this EIR, but in Summary, the GPU is intended to be a comprehensive update of the County's current 1984 General Plan. The General Plan expresses the community's goals for the distribution of future land uses for approximately the next 20 years, both public and private, and establishes policies, standards and implementation measures for future development. It reviews and revises the basic assumptions regarding population projections and future land use demand and proposes land use designations and diagrams (maps), together with policies to meet that demand in a manner consistent with State law.

Lead Agency Contact

Name Michael Richardson
Agency Humboldt County Planning Division
Phone 707-268-3723 **Fax** 707 268-3792
email
Address 3015 H Street
City Eureka **State** CA **Zip** 95501

Project Location

County Humboldt
City
Region
Lat / Long
Cross Streets
Parcel No.

Township	Range	Section	Base
			HB&M

Proximity to:

Highways
Airports
Railways
Waterways
Schools
Land Use update to GP

Project Issues Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Landuse; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply; Aesthetic/Visual; Coastal Zone; Economics/Jobs; Forest Land/Fire Hazard; Schools/Universities; Septic System; Sewer Capacity; Solid Waste; Vegetation; Wetland/Riparian; Growth Inducing; Cumulative Effects; Agricultural Land

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Wildlife, Region 1E; Department of Parks and Recreation; Department of Water Resources; Caltrans, District 1; Regional Water Quality Control Board, Region 1; Native American Heritage Commission

Date Received 04/21/2017 **Start of Review** 04/24/2017 **End of Review** 06/07/2017



State of California • Natural Resources Agency
Department of Conservation
Division of Oil, Gas, and Geothermal Resources
Northern District – Sacramento
801 K Street • MS 18-05
Sacramento, CA 95814
(916) 322-1110 • FAX (916) 445-3319

Edmund G. Brown Jr., Governor
Kenneth A. Harris Jr., State Oil and Gas Supervisor

CEQA
6-7-17
E

June 6, 2017

Governor's Office of Planning & Research

JUN 06 2017

STATE CLEARINGHOUSE

State Clearinghouse
PO Box 3044
Sacramento, CA 95812-3044

Subject: CEQA project: SCH #2007012089
Lead Agency: Humboldt County
Project Title: Humboldt County General Plan Update

Ladies/Gentlemen:

The Division of Oil, Gas, and Geothermal Resources (Division) oversees the drilling, operation, maintenance, and plugging and abandonment of oil, natural gas, and geothermal wells. Our regulatory program emphasizes the wise development of oil, natural gas, and geothermal resources in the state through sound engineering practices that protect the environment, prevent pollution, and ensure public safety. Northern California is known for its rich gas fields and Humboldt County for one of the first oil fields in California at Petrolia.

From the California Office of Historic Preservation:

"California's first drilled oil wells that produced crude to be refined and sold commercially were located on the North Fork of the Mattole River approximately three miles east of here. The old Union Mattole Oil Company made its first shipment of oil from here, to a San Francisco refinery, in June 1865. Many old well heads remain today."

The Division maintains digital production data dating back to 1977. From the years 1977 to 2016 64,232,699 (Mcf) of natural gas was produced from gas wells located in Humboldt County (Figure 1). Currently there are two active fields and one idle field in Humboldt County (Figures 2 and 3). Tompkins Hill Gas Field, located approximately 1-mile north of Fortuna, has 22 active wells and 17 idle wells. The Grizzly Bluff Gas Field located near Ferndale has 3 active wells and 7 idle wells. The Petrolia Gas field has 3 idle wells that are shut in and not producing gas. We do not have any records of the oil production.

Data for wells located on private and public land shown on the maps can be found at the Division's websites:

<http://maps.conservation.ca.gov/doggr/wellfinder/#close>

<https://secure.conservation.ca.gov/WellSearch>

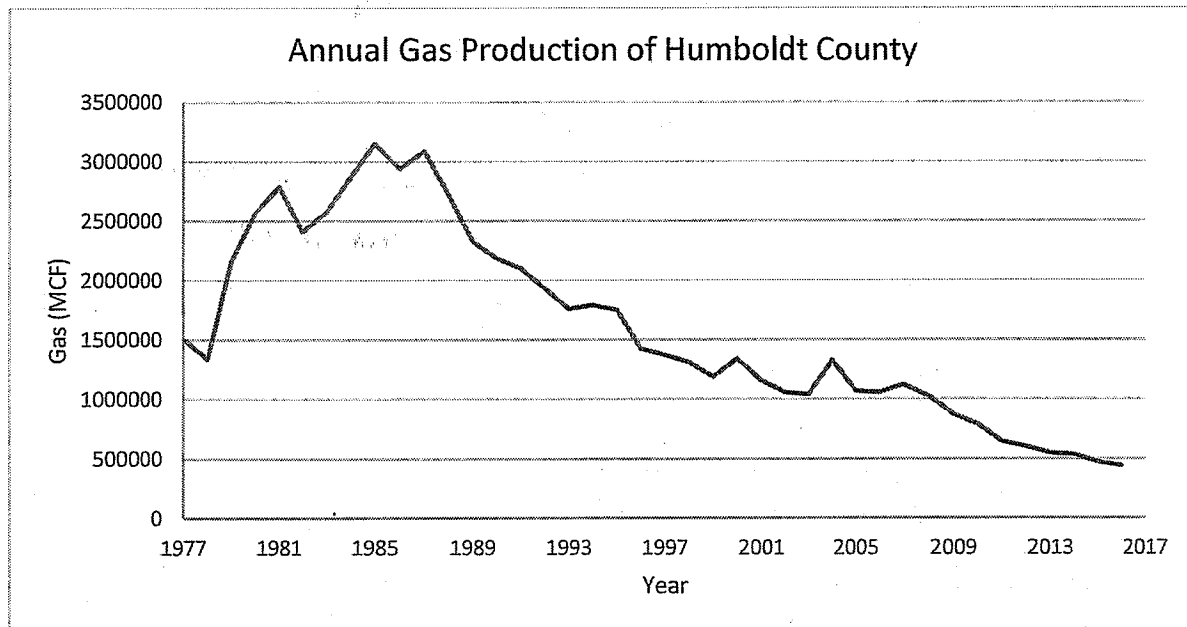


Figure 1 Annual production of natural gas from Humboldt County 1977-2016.

Permitting agency(s) and property owner(s) should be aware of, and fully understand, that significant and potentially dangerous issues may be associated with development near oil and gas wells. These issues are non-exhaustively identified in the following comments, and are provided by the Division for consideration by the permitting agency, in conjunction with the property owner and/or developer, on a parcel-by-parcel or well-by-well basis.

1. Maintaining sufficient access to an oil or gas well may be generally described as maintaining "rig access" to the well. Rig access allows a well servicing rig and associated necessary equipment to reach the well from a public street or access way, solely over the parcel on which the well is located. A well servicing rig, and any necessary equipment, should be able to pass unimpeded along and over the route, and should be able to access the well without disturbing the integrity of surrounding infrastructure.
2. The Division recommends that a permitting agency consider the use of surface mitigation measures as a condition for project approval, if and when appropriate. Examples of surface mitigation measures include venting systems for wells, venting systems for parking lots, patios, and other hardscape, methane barriers for building foundations, methane detection systems, and collection cellars for well fluids. The Division **does not** regulate the design, installation, operation, or adequacy of such measures. The Division recommends that such surface mitigation measures are designed, installed, and operated by qualified engineers. The permitting of surface mitigation measures falls under the jurisdiction of the permitting agency.
3. If during the course of development of a parcel any unknown well(s) is discovered, the Division should be notified immediately so that the newly discovered well(s) can be incorporated into the records and investigated.

4. The Division recommends that any soil containing significant amounts of hydrocarbons to be disposed of in accordance with local, state, and federal laws. Please notify the appropriate authorities if soil containing significant amounts of hydrocarbons is discovered during development.
5. The Division recommends that any wells found in the course of this project and any pertinent information obtained after the issuance of this letter, be communicated to the appropriate county recorder for inclusion in the title information of the subject real property. This is to ensure that present and future property owners are aware of (1) the wells located on the property, and (2) potentially significant issues associated with any improvements near oil or gas wells.

No well work may be performed on any oil or gas well without written approval from the Division in the form of an appropriate permit. This includes, but is not limited to, mitigating leaking fluids or gas from abandoned wells, modifications to well casings, and/or any other re-abandonment work. (NOTE: the Division regulates the depth of any well below final grade (depth below the surface of the ground). Title 14, Section 1723.5 of the California Code of Regulations states that all well casings shall be cut off at least 5 feet but no more than 10 feet below grade. If any well needs to be lowered or raised (i.e. casing cut down or casing riser added) to meet this grade regulation, a permit from the Division is required before work can start.)

To reiterate, the permitting agency, property owner, and/or developer should be aware of, and fully understand, that the above comments are made by the Division with the intent to encourage full consideration of significant and potentially dangerous issues associated with development near oil or gas wells.

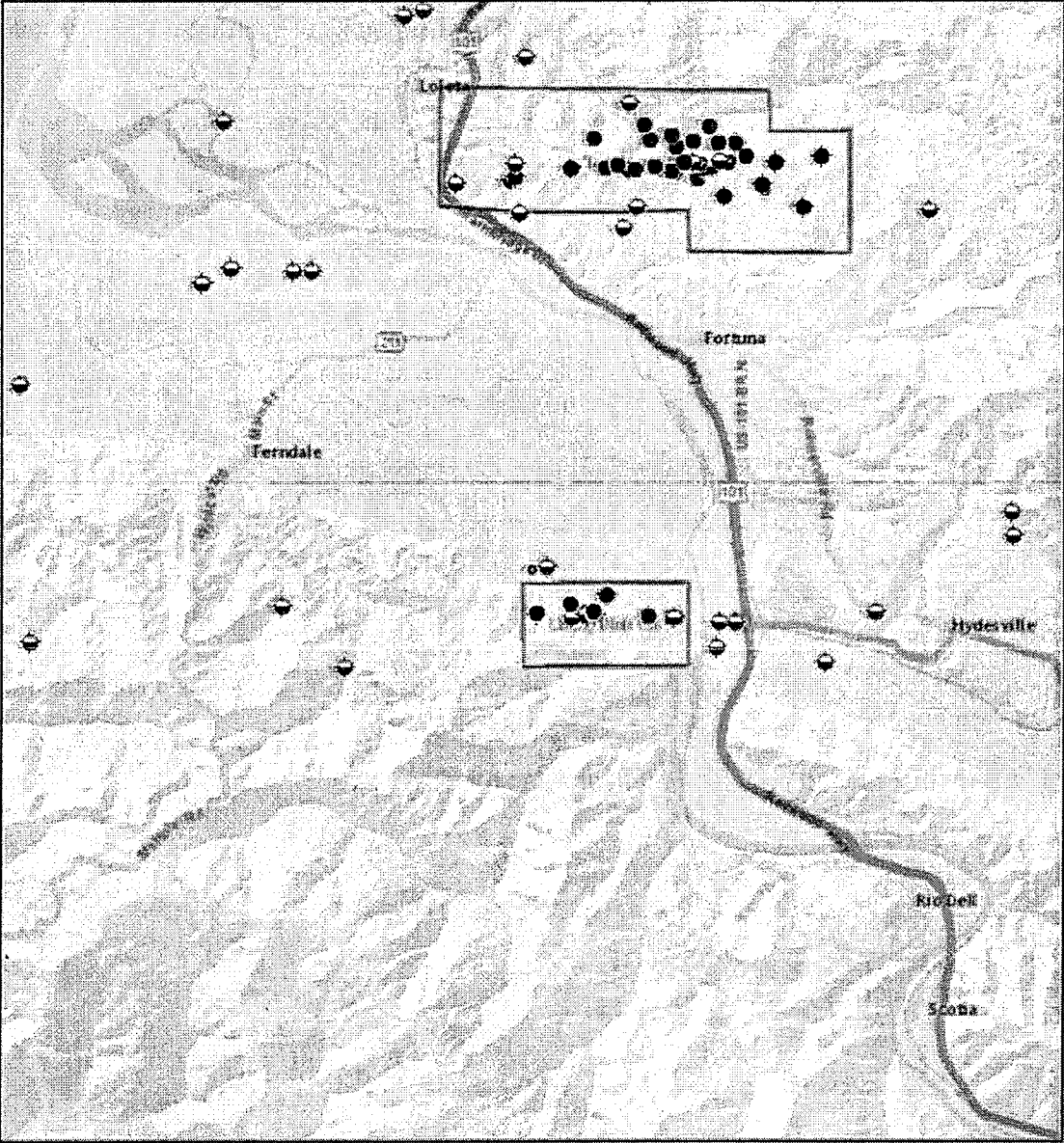
Thank you for the opportunity to comment on this project.

Sincerely,

Charlene L Wardlow

Charlene L Wardlow
Northern District Deputy

Active Fields

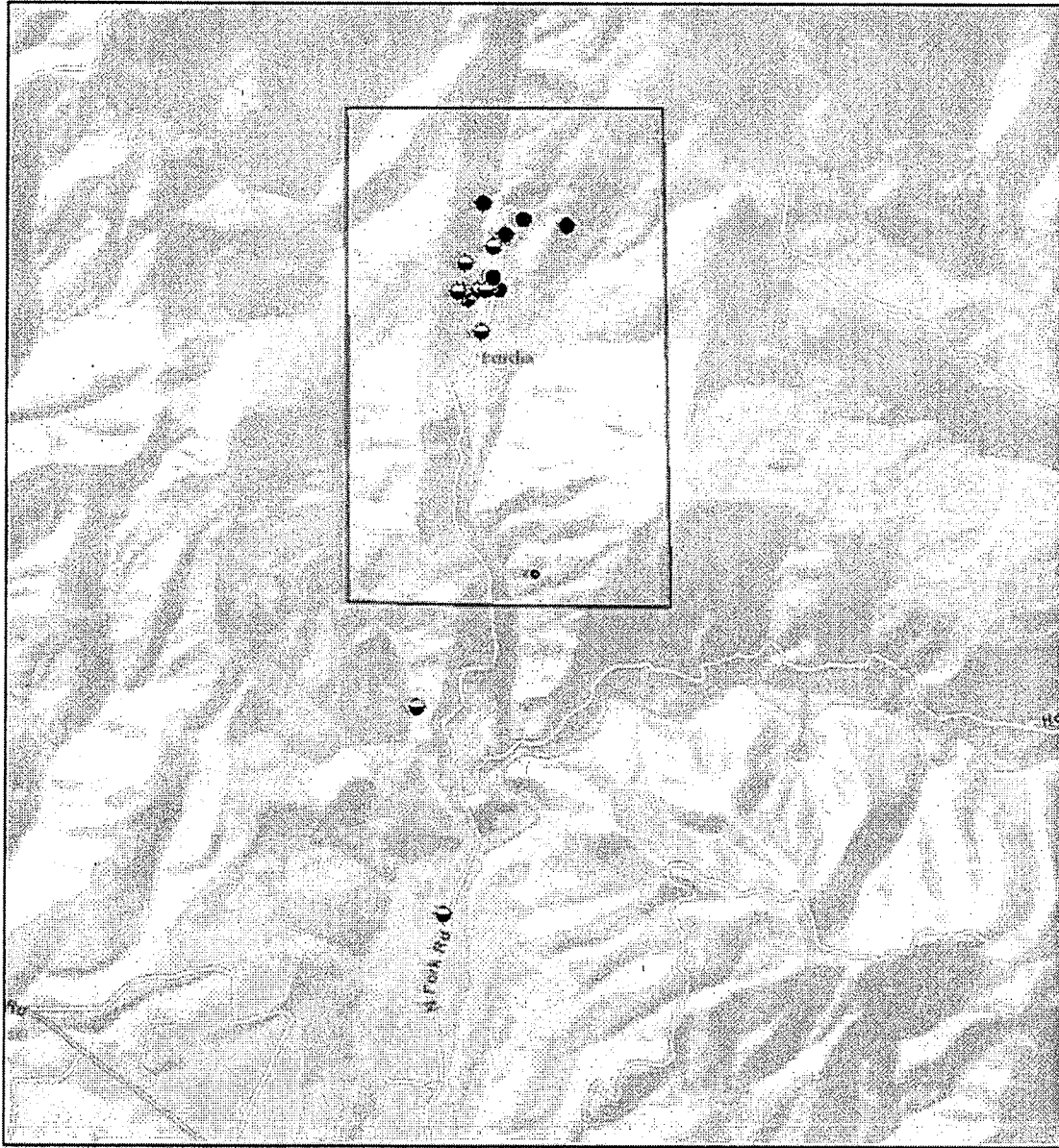


May 26, 2017



Figure 2 The two currently active gas fields; Tompkins Hill Gas and Grizzly Bluff Gas.

Petrolia Gas



May 26, 2017

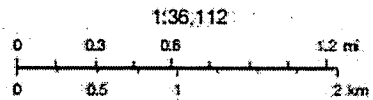


Figure 3 Petrolia Gas Field located on the hills above Petrolia.

June 20, 2017

Michael Richardson
Supervising Planner
Advance Planning Division
County of Humboldt
3015 H Street
Eureka, CA 95501
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Re: Mercer Fraser Company / General Plan Update – Revised Draft EIR

Dear Mr. Richardson:

On behalf of the Mercer Fraser Company (“Mercer Fraser”), we thank you for the opportunity to comment on the Revised Draft Environmental Impact Report (“EIR”) for the Board of Supervisors Draft of the County’s General Plan Update (“Draft GPU”). The purpose of this letter is to voice our opposition to a suggestion in the EIR that changes be made to the Draft GPU’s current definition of wetlands.

This letter will discuss the Draft GPU’s current definition of wetlands and then discuss the EIR’s suggested changes to that definition.

Draft GPU Definition of Wetlands

Prior to adoption of the current Draft GPU, Mercer Fraser submitted letters on May 30, and July 9, 2014 requesting the Board to adopt a wetlands definition that aligns with the US Army Corps of Engineers (the “Corps”) wetlands delineation standards. As Mercer Fraser indicated in its May 30 and July 9 letters, the Corps has exclusive jurisdiction over wetlands delineation in California.

On September 8, 2014, in response to the comments of Mercer Fraser and others, the Board approved the Draft GPU’s current definition of wetlands. This definition is found in standard BR-S11 of the Conservation and Open Space Element:

BR-S11. Wetlands Defined. The County considers wetlands as lands transitional between terrestrial and aquatic systems where the water table is usually at or near the surface or the land is covered by shallow water. Wetlands must have all of the following three attributes: (1) at least periodically, the land supports hydrophytes, (2) the substrate is predominantly undrained hydric soil, and (3) the substrate is non-soil and is saturated with water or covered by shallow water at some time during the growing season of each year.

(See Exhibit A.)

The above language is acceptable because it aligns with the Corps' delineation standards for wetlands.

We will now discuss the changes that the EIR suggests be made to BR-S11. These changes conflict with both the Board's prior directions and the Corps' standards.

The EIR's Suggested Changes to the GPU's Wetlands Definition¹

The EIR claims that the current Draft GPU language for BR-S11 is problematic because "areas cannot logically have both hydric soil substrate and non-soil substrate at the same time." However, the changes suggested in the EIR are not necessary and conflict with the Corps' wetlands delineation standards.

In "Mitigation Measure 3.11.3.2" the EIR suggests the following change to the text of BR-S11:

BR-S11. Wetlands Defined. The County considers wetlands as lands transitional between terrestrial and aquatic systems where the water table is usually at or near the surface or the land is covered by shallow water. ~~Wetlands must have all of the following three attributes: (1) at least periodically, the land supports hydrophytes, (2) the substrate is predominantly undrained hydric soil, and (3) the substrate is non soil and is saturated with water or covered by shallow water at some time during the growing season of each year.~~ **An area is wetland if, under normal circumstances, (1) the area has continuous or recurrent saturation of the upper substrate caused by groundwater, or shallow surface water, or both; (2) the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and (3) the area's vegetation is dominated by hydrophytes or the area lacks vegetation.**

(emphasis added) (See Exhibit B.)

The changes above are not necessary because there is no logical flaw in the current language of BR-S11. The substrate can contain hydric soil as well as non-soil saturated with water or covered by shallow water in the same area.

More importantly, by indicating that wetlands can lack vegetation, the wetlands definition suggested in the EIR conflicts with the Corps standards. Unlike the language suggested above, the Corps standards require that wetlands "under normal circumstances...support, a prevalence of vegetation" adapted for water saturated soil. (See *Wetlands Delineation Manual*, US Army Corps of Engineers (1987) at pages 9-10, attached hereto as Exhibit C.)

¹ In the second paragraph of page 3.11-14 of the EIR, a statement is made that the County must follow the identification and classification policies of the California Department of Fish and Wildlife ("DFW") in its wetland delineation policies. As we outlined in our July 9, 2014 letter to the Board, the Corps and not the DFW has exclusive authority over wetlands delineation.

Mr. Michael Richardson
Mercer Fraser Company – General Plan Update : RDEIR
June 20, 2017

The wetlands definition currently found in BR-S11 more accurately aligns with the Corps' wetlands standards related to vegetation. Similar to the Corps' standards, the current version of BR-S11 requires that an area support hydrophytes (water adapted plants), at least periodically, in order for a positive wetlands determination to be made. The current language of BR-S11 also aligns with the Corps' wetlands characteristics related to hydrology and soil.

The changes suggested by the EIR are not necessary and conflict with the Corps' current wetlands delineation standards. The County should retain the current language found in BR-S11 of the Draft GPU.

CONCLUSION

We appreciate the opportunity to comment on the EIR and trust that the County will find the above comments helpful in the GPU process. Please do not hesitate to contact me if you have any questions.

Very truly yours,
HARRISON, TEMBLADOR, HUNGERFORD &
JOHNSON

By:



Mark D. Harrison

Encl.

Cc: Justin Zabel, Mercer Fraser Company
Humboldt County Board of Supervisors

Exhibit A

1. Slopes will be temporarily stabilized by stage seeding and/or planting of fast germinating seeds, such as barley or rye grass, and mulched with protective coverings such as natural or chemical stabilizations, and
2. Runoff from the site will be temporarily detained or filtered by berms, vegetated filter strips, and/or catch basins to prevent the escape of sediment from the site. Drainage controls are to be maintained as long as necessary to prevent erosion throughout construction.

Wetlands and Other Wet Areas

BR-S10. Development Standards for Wetlands. Development standards for wetlands shall be consistent with the standards for Streamside Management Areas, as applicable except that the widths of the SMA for wetlands are as follows:

seasonal wetlands = 50 ft.

perennial wetlands = 150 ft.

and the setback begins at the edge of the delineated wetland. Buffers may be reduced based on site specific information and consultation with the California Department of Fish and Wildlife. No buffer shall be required for man-made wetlands except wetlands created for mitigation purposes.

BR-S11. Wetlands Defined. The County considers wetlands as lands transitional between terrestrial and aquatic systems where the water table is usually at or near the surface or the land is covered by shallow water. Wetlands must have all of the following three attributes: (1) at least periodically, the land supports hydrophytes, (2) the substrate is predominantly undrained hydric soil, and (3) the substrate is non-soil and is saturated with water or covered by shallow water at some time during the growing season of each year.

Other Sensitive and Critical Habitats

Oak Woodlands

BR-S12. Discretionary Review within Oak Woodlands. Discretionary projects which may result in a significant effect on oak woodlands shall evaluate and mitigate any impacts, consistent with the provisions of CEQA, specifically Public Resources Code Section 21083.4.

Invasive Plant Species

BR-S13. Principally Permitted Accessory Use. Invasive plant species management and control measures shall be considered a principally permitted accessory use in all zones, except in the Coastal Zone.

10.3.5 Implementation Measures

BR-IM1. Biological Resource Maps. The County shall maintain the best available data in the form of GIS maps for the location and extent of wetlands, critical habitats, streamside management areas, rookeries, and ranges of species identified in the California Natural Diversity Database.

Exhibit B

In working with County Planning and Building Department staff, builders, developers, and environmental consultants to prevent the loss of wetlands and wetland habitat values, CDFW determined there is a strong interest and need for a wetland mitigation bank in the Humboldt Bay-Eel River Delta area. While it is CDFW's policy to provide for the protection, preservation, restoration, enhancement and expansion of natural wetland habitat, CDFW finds that in certain limited instances, utilization of a local wetland bank may be the most environmentally sound, feasible, and cost-effective approach to mitigate for impacts to wetlands. CDFW therefore recommended the County consider working with local, state, and federal agencies and private stakeholders to promote or facilitate developing a wetland bank for the Humboldt Bay-Eel River Delta area. CDFW is willing to provide technical support for the creation of a local wetland bank. The Board of Supervisors incorporated this recommendation into the GPU with Implementation Measure BR-IMx2 - Wetlands Bank.

Under Standard BR-S11, Wetlands Defined, the County must follow the identification and classification policies of the California Department of Fish and Wildlife which considers wetlands as lands transitional between terrestrial and aquatic systems where the water table is usually at or near the surface or the land is covered by shallow water. In Standard BR-S11, wetlands must have the following three attributes: (1) at least periodically, the land supports hydrophytes, (2) the substrate is predominantly undrained hydric soil, and (3) the substrate is non-soil and is saturated with water or covered by shallow water at some time during the growing season of each year. This definition does not work well because areas cannot logically have both hydric soil substrate and non-soil substrate at the same time.

Conclusion

Through implementation of General Plan Update policies, standards, and implementation measures the County will assess development impacts on wetlands and associated sensitive habitats, as part of the review process for discretionary permits, as well as to protect water quality. As discussed above, the definition of wetland contains a logical flaw, and needs to be revised.

Mitigation

The following implementation measure below shall be fulfilled to help address the potential impacts related to the definition of wetlands in the General Plan Update. Alternative language is presented below that would correct the existing logical flaw in Standard BR-S11.

Mitigation Measure 3.11.3.2. Replace BR-S11 with the below definition of wetlands:

"BR-S11. Wetlands Defined. The County considers wetlands as lands transitional between terrestrial and aquatic systems where the water table is usually at or near the surface or the land is covered by shallow water. ~~Wetlands must have all of the following three attributes: (1) at least periodically, the land supports hydrophytes, (2) the substrate is predominantly undrained hydric soil, and (3) the substrate is non-soil and is saturated with water or covered by shallow water at some time during the growing season of each year.~~ An area is wetland if, under normal circumstances, (1) the area has continuous or recurrent saturation of the upper substrate caused by groundwater, or shallow surface water, or both; (2) the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and (3) the area's vegetation is dominated by hydrophytes or the area lacks vegetation."

Level of Significance After Mitigation

With the above revision to Standard BR-S11 and continued implementation of existing federal and state regulations, and proposed new policies and implementation measures of the General Plan Update regarding protection of wetlands, impacts to federally protected wetlands would be **less than significant**.

Impact 3.11.3.3. Wildlife Corridors and Nursery Sites

Implementation of the General Plan Update would result in additional development that could interfere with the movement of native resident or migratory fish or wildlife species or with their migratory wildlife corridors, or impede the use of native wildlife nursery sites.

This impact analysis addresses item "d" of the significance standards listed in Appendix G of the CEQA Guidelines as provided in Section 3.11.2 above. Pursuant to these standards, the proposed County General Plan Update would have a significant impact if it would:

- a) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Development and land use activities consistent with the General Plan Update could result in a reduction in existing habitat, could contribute to further fragmentation of remaining natural areas, and could substantially interfere with the movement of native fish and wildlife species. These include potential impacts to special-status species, sensitive natural communities, and streams and wetlands, as well as more general wildlife habitat resources.

Roosevelt Elk habitat and deer winter range are mapped on the Biological Resources maps that identify important wildlife corridors. Within the coastal zone, a Roosevelt Elk Habitat combining zone is applied to lands which contain elk corridors, and calls for their protection.

Streams tend to serve as important movement corridors for terrestrial and aquatic wildlife, and protection of areas that qualify as SMAs is essential to protecting existing habitat functions and values. Forested areas and native woodlands also tend to provide important habitat resources to wildlife.

A substantial amount of development could occur in the unincorporated areas as a result of buildout of the General Plan Update land use designations at specified minimum parcel sizes, despite many site specific constraints that may exist. A portion of this development would occur on parcels containing SMAs.

Discretionary development that would occur under the General Plan Update would be sited and designed to avoid impacts to the movement of native resident migratory fish or wildlife species and to avoid established native resident or migratory corridors and wildlife nursery sites. Such areas are identified in biological resource maps, Humboldt County GIS layers, and the California Natural Diversity Database. The County uses these tools to assess whether or not new development would potentially impact the movement of wildlife, and to ensure that such impacts would be avoided through project design, siting, and conditions of approval.

Exhibit C

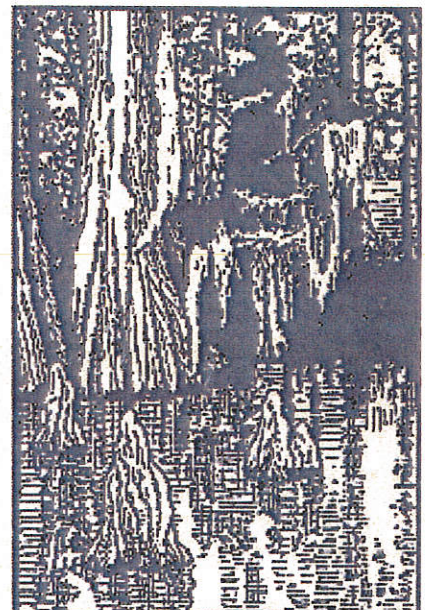


**US Army Corps
of Engineers**
Waterways Experiment
Station

Wetlands Research Program Technical Report Y-87-1 (on-line edition)

Corps of Engineers Wetlands Delineation Manual

by Environmental Laboratory



January 1987 - Final Report
Approved For Public Release; Distribution Is Unlimited



Part II: Technical Guidelines

24. The interaction of hydrology, vegetation, and soil results in the development of characteristics unique to wetlands. Therefore, the following technical guideline for wetlands is based on these three parameters, and diagnostic environmental characteristics used in applying the technical guideline are represented by various indicators of these parameters.

25. Because wetlands may be bordered by both wetter areas (aquatic habitats) and by drier areas (nonwetlands), guidelines are presented for wetlands, deepwater aquatic habitats, and nonwetlands. However, procedures for applying the technical guidelines for deepwater aquatic habitats and nonwetlands are not included in the manual.

Wetlands

26. The following definition, diagnostic environmental characteristics, and technical approach comprise a guideline for the identification and delineation of wetlands:

- a. *Definition.* The CE (*Federal Register* 1982) and the EPA (*Federal Register* 1980) jointly define wetlands as: Those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas.
- b. *Diagnostic environmental characteristics.* Wetlands have the following general diagnostic environmental characteristics:
 - (1) *Vegetation.* The prevalent vegetation consists of macrophytes that are typically adapted to areas having hydrologic and soil conditions described in *a* above. Hydrophytic species, due to morphological, physiological, and/or reproductive adaptation(s), have the ability to grow, effectively compete, reproduce, and/or persist in anaerobic

soil conditions.¹ Indicators of vegetation associated with wetlands are listed in paragraph 35.

- (2) *Soil.* Soils are present and have been classified as hydric, or they possess characteristics that are associated with reducing soil conditions. Indicators of soils developed under reducing conditions are listed in paragraphs 44 and 45.
- (3) *Hydrology.* The area is inundated either permanently or periodically at mean water depths ≤ 6.6 ft, or the soil is saturated to the surface at some time during the growing season of the prevalent vegetation.² Indicators of hydrologic conditions that occur in wetlands are listed in paragraph 49.

- c. *Technical approach for the identification and delineation of wetlands.* Except in certain situations defined in this manual, evidence of a minimum of one positive wetland indicator from each parameter (hydrology, soil, and vegetation) must be found in order to make a positive wetland determination.

Deepwater Aquatic Habitats

27. The following definition, diagnostic environmental characteristics, and technical approach comprise a guideline for deepwater aquatic habitats:

- a. *Definition.* Deepwater aquatic habitats are areas that are permanently inundated at mean annual water depths >6.6 ft or permanently inundated areas ≤ 6.6 ft in depth that do not support rooted-emergent or woody plant species.³
- b. *Diagnostic environmental characteristics.* Deepwater aquatic habitats have the following diagnostic environmental characteristics:
 - (1) *Vegetation.* No rooted-emergent or woody plant species are present in these permanently inundated areas.
 - (2) *Soil.* The substrate technically is not defined as a soil if the mean water depth is >6.6 ft or if it will not support rooted emergent or woody plants.

¹ Species (e.g., *Acer rubrum*) having broad ecological tolerances occur in both wetlands and non-wetlands.

² The period of inundation or soil saturation varies according to the hydrologic/soil moisture regime and occurs in both tidal and nontidal situations.

³ Areas ≤ 6.6 ft mean annual depth that support only submergent aquatic plants are vegetated shallows, not wetlands.

**Humboldt County General Plan Update
Revised Draft Environmental Impact Report (RDEIR)**

Review of RDEIR for Inconsistencies and Conflicts

Compiled on behalf of Humboldt Association of Realtors,
Humboldt Coalition for Property Rights,
and North California Association of Home Builders

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I. Concerns regarding the RDEIR's treatment of cannabis cultivation and the CMMLUO

Beginning on Page 3.2-7, the RDEIR discusses the existence, historical basis, and potential impacts of the commercial cannabis industry in Humboldt County. Though the discussion of cannabis cultivation goes on for some length, the RDEIR goes on to state that “the environmental impacts of the future regulatory program will be evaluated in a separate environmental document, and are therefore not discussed any further in this EIR” (RDEIR Page 3.2-9).

RDEIR Page 1-2, section 1.1.1. Paragraph 2., Tiering and Required approvals, states:

“This Program EIR is a first-tier environmental document that assesses and documents the broad environmental impacts that can be expected to occur from the adoption and implementation of the General Plan Update...”

It is our position that failure to more adequately address the broad environmental impacts of illegal cannabis cultivation, regulated commercial cannabis production, and the impact of the CMMLUO is a flaw in the RDEIR that violates the California Environmental Quality Act's guidelines pertaining to the requirements of a General Plan's EIR.

The RDEIR does not analyze and discuss the “significant broad environmental impacts” due to recent changes in the zoning maps and ordinance(s) that accommodated the cannabis industry in the CMMLUO. Similarly, the RDEIR does not analyze and discuss the economic and equitable impacts of the net loss of industrial zoned lands for commercial and industrial uses other than for the cannabis industry.

In several sections in the document, the RDEIR does discuss some of the impacts that will arise due to advancement of the CMMLUO, and which are already present due to historical cannabis cultivation activity. For example, Beginning on page 3.2-7, the RDEIR states:

“New roads have been bulldozed into the landscape without permits or proper design to prevent erosion. Traffic on unpaved roads is estimated to contribute as much as 60% of Humboldt County's PM₁₀, the only criteria air pollutant for which the County exceeds established standards.”

The County lightly touches on the effects of the cannabis cultivation, and by extension the CMMLUO, is having on resources lands. This acknowledgment of the implications of cannabis cultivation is appreciated.

However, what is conspicuously missing from the RDEIR is the discussion of its impacts with respect to *each chapter of the GPU*.

Despite the awareness of those impacts, the document states that there will not be discussion and analysis here in this RDEIR on CMMLUO, rather there is to be a separate EIR for the CMMLUO that provides mitigation via an outside agency's Environmental Review and its mitigation measures.

There are goals, policies, standards and implementation measures regarding medical cannabis

cultivation in the General Plan. There has to be discussion and analysis of it in this RDEIR for the General Plan per CEQA. If not rectified, the decision makers and the public are provided with an inaccurate and incomplete analysis.

In addition, the Notice of Preparation that was issued in 2007 is now severely out of date, particularly in relation to existing environmental conditions on the ground. The impacts of cannabis cultivation in Humboldt County have increased exponentially over the past decade, and particularly over the last five to seven years. It is our concern that the RDEIR's discussion of cannabis impacts is inadequate because it is derived from a baseline that was established over a decade ago.

RDEIR Page 1-3. Section 1.3.1., Scoping the Issues to be Discussed in the EIR, states:

The County distributed a Notice of Preparation (NOP) (Appendix P) to numerous agencies to let them know an EIR was being prepared for the GPU, and asking the agencies for comments on what should be included in the EIR.

The NOP was circulated in 2007, and the formal comment period for that first GPU NOP was from January 22, 2007 to February 22, 2007. This period was prior to the Humboldt County Planning Commission had making its recommendations on the GPU, and nine years prior to the Humboldt County Board of Supervisors' review of the GPU. This process created inconsistencies as well as confusion about which of the various drafts formed the actual basis for the environmental analysis.

II. Concerns regarding proposed changes to General Plan Standard BRS-11, Wetlands Defined

In 2014, following significant debate and public input, the Board of Supervisors voted upon the language of Standard BRS-11, Wetlands Defined, and arrived at the following definition:

BR-S11. Wetlands Defined. The County shall follow the identification and classification policies of the Department of Fish and Game which considers wetlands as lands transitional between terrestrial and aquatic systems where the water table is usually at or near the surface or the land is covered by shallow water. Wetlands must have ~~one all of or more of~~ the following three attributes: (1) at least periodically, the land supports hydrophytes, (2) the substrate is predominantly undrained hydric soil, and (3) the substrate is non-soil and is saturated with water or covered by shallow water at some time during the growing season of each year. Straw Vote: 4-1 (Lovelace) 9-8-14 (RDEIR Appendix A, Pg. A-78)

The RDEIR proposes the following changes to the language, which appears thusly on Page 3.11-14:

Mitigation Measure 3.11.3.2. Replace BR-S11 with the below definition of wetlands:

BR-S11. Wetlands Defined. The County considers wetlands as lands transitional between terrestrial and aquatic systems where the water table is usually at or near the surface or the land is covered by shallow water. ~~Wetlands must have all of the following three attributes: (1) at least periodically, the land supports hydrophytes, (2) the substrate is predominantly undrained hydric soil, and (3) the substrate is non-soil and is saturated with water or covered by shallow water at some time during the growing season of each year.~~ An area is wetland if, under normal circumstances, (1) the area has continuous or recurrent saturation of the upper substrate caused by groundwater, or shall allow surface water, or both; (2) the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and (3) the area's vegetation is dominated by hydrophytes or the area lacks vegetation.

The logical reasoning for the change, that "This definition does not work well because areas cannot logically have both hydric soil substrate and non-soil substrate at the same time" (RDEIR 3.11.3.1., Pgs. 3.11-12), is incorrect. An example of a situation in which hydric soil substrate and non-soil substrate can coincide is sand.

Furthermore, the proposed changes stand to have a significant impact on the identification of wetlands in Humboldt County, and a significant impact on the economic viability of commercial, industrial, or residential uses that center on areas which would potentially be re-classified as wetlands under the proposed changes. The proposed language creates ambiguity and the potential for interpretation of the term "wetlands" that is not in keeping with the intent of the Board of Supervisors as reflected by their straw vote from September 9, 2014. We suggest refraining from making any changes to the language approved by the Board of Supervisors, as the proposed modification amends what has been previously agreed upon without public discussion or input.

III. Concerns regarding RDEIR's evaluation of economic and social effects

Section 21083(c) of CEQA guidelines requires an agency to determine that a project may have a significant effect on the environment if it will cause substantial adverse effects on human beings, either directly or indirectly. The RDEIR largely ignores vetting the vast majority of policies, goals, and implementation measures contained within the proposed General Plan with considerations given to social or economic impacts.

A 2015 ruling by the CA Supreme Court in *California Building Industry Assoc. v. Bay Area Air Quality Management District* (Dec. 17, 2015) *Cal.4th* does establish that “CEQA generally does not require an analysis of how existing environmental conditions will impact a project’s future users or residents.” (2016 CEQA State Guidelines Pg. Xxiv). However, that ruling applies only to existing conditions, and not to conditions which may be created as a result of the implementation of the proposed General Plan.

Further, leeway is sometimes given to the lead agency preparing an EIR to determine whether analyzing impacts of a social or economic nature is necessary. This may have been the position taken in the preparation of this specific RDEIR document. However, due to the exhaustive number of policies and new regulations contained within the proposed General Plan which stand to have extremely significant impacts on the social and economic fabric of Humboldt County, failure to address those potential impacts is in conflict with the intent of both the proposed General Plan and EIR.

Furthermore, the Section 21083(c), as discussed in *CBLA v. BAAQMD*, is still codified in the language presented in the most up-to-date CEQA State guidelines.

a. Absence of analysis of the Economic Development element

A majority of policies, goal, implementation measures, etc., contained within the General Plan's Economic Development element undoubtedly stand to have far-reaching effects on both the environment and on the human residents of Humboldt County.

The RDEIR states that the Economic Development element is an optional element. We wish to note that a number of optional elements in the GPU are fully analyzed in the RDEIR – this creates an inconsistency in the approach to the General Plan and seems to conflict with the notion that an EIR should examine all facets of a General Plan that have potential for significant environmental impacts.

In keeping with 21083(c), in which CEQA requires an agency to determine that a project may have a significant effect on the environment if it will cause substantial adverse effects on human beings, either directly or indirectly, we were anticipating a section which would examine potential impacts of the GPU on industrial and commercial growth. We were similarly anticipating an entire section on jobs, commercial uses and industrial uses to be in this section, or at least within this document as is required by CEQA. Jobs, or the lack of them, resulting from the regulatory zoning constraints on available develop-able lands directly and significantly impacts people and their families.

b. Analysis of regulatory constraints

A number of policies in the proposed General Plan would place regulatory constraints on both private and public lands. Whether the reasoning behind creating these regulatory constraints is sound or not, the RDEIR fails to address how these regulatory constraints may or may not impact the environment, the economy, or the people of Humboldt County.

From RDEIR Page 2-23, Section 2.5:

“The resulting developable acreage is shown in Table 2.5-1. Approximately 1,491,900 acres will therefore likely remain in open space, resource production, and recreational uses, with little or no development. There remains 748,861 acres of vacant and underdeveloped area available for development without these physical constraints. That area could theoretically provide for as many as 38,972 additional dwelling units in the unincorporated area of the County if developed at the full density allowed for each land use designation as proposed in the GPU. The GPU provides ample room for future development, even without the areas with significant physical constraints.”

The above statement holds that County policy under the proposed plan would allow for a significantly larger number of new dwelling units than the RDEIR anticipates and accounts for. Per CEQA, the County must address the potential impacts of the GPU, particularly when those impacts would be explicitly allowed and/or created by the implementation of the General Plan. County policy pertaining to land use, zoning, and development regulations will be the direct cause of these foreseeable impacts.

Conversely, assuming that the apparently conflicting statements and tables in the RDEIR are a correct measure of available developable land within Humboldt County, the general plan does not allow for this level of development. There is an insufficient amount of appropriately zoned land for the theoretical 38,972 additional dwelling units, and there is similarly an inadequate amount of land zoned for the commercial and industrial services that would be required to support the families residing in those new dwelling units.

A further illustration of the RDEIR's failure to examine regulatory constraints can be found in the discussion in RDEIR Section 3.16, Scenic Resources, particularly with regards to limitations on development that would impinge upon “scenic” vistas. This excerpt from 3.16 Pg. 3.16-7 demonstrates the potential problems:

The General Plan Update land use diagram largely maintains existing resource and open space land use designations, which would serve to limit the development of forested and agricultural open space lands. In addition, in Conservation and Open Space Element, Scenic Resources, Policy SR-P1, Development in Identified Scenic Viewsheds, in combination with Implementation Measure SR-IM1, Mapping of Scenic Areas and Scenic Highways, would identify and map scenic areas and allow development within such lands only in a manner consistent with natural slopes and contours. Scenic viewsheds are not currently identified or mapped, and would be mapped as part of a public process as an implementation of the General Plan Update. Standard SR-S1, Development in Mapped Scenic Areas, requires that discretionary and ministerial development avoid visual disturbance of natural contours, hilltops, tree lines, forest landscapes, bluffs and rock outcroppings, to the maximum extent feasible. It further requires that roads and public utility corridors be as narrow as feasible and follow natural contours, natural features disturbed by construction be restored as close to natural condition as feasible, and prohibits new off-premise

billboards.

A number of issues arise from the implications of this text with regards to regulatory constraint. If the concepts described are proposed to apply to private property, this would represent a significant regulatory burden. It would lead to significant angst for private property owners, substantial new costs on new development, would economically encumber many tens of thousands of acres in Humboldt County, and would be inconsistent with goals stated in both the Economic Development and Conservation and Open Space elements (ED-G1, ED-G2, CO-G1).

There is no analysis of this concept that justifies such an encumbrance for private landowners. In viewing the full text of the chapter, it seems that free rein is granted to the County to designate an alarmingly significant amount of land as "scenic" without providing any basis for how the process of designating and mapping "scenic" areas would occur. This improper delegation of authority is not analyzed whatsoever for its potential social and economic impacts.

Further, no definition of terms that are crucial to the reading of this section are provided in either the proposed General Plan or in the RDEIR. Without definitions for key terms herein (e.g., "identified scenic view shed", "visual disturbance of natural contours", "hilltops", "tree lines", "forest landscapes", "bluffs and rock outcroppings"), it is impossible to understand the scope or impacts of the proposed goals, policies, standards and implementation measures. There is a lack of quantifiable measures by which to analyze the impacts of such a policy.

c. Water capacity for industrial and commercial uses

There is a conspicuous lack of discussion regarding wastewater and water capacity for industrial and commercial uses and development. The RDEIR discusses the capacity available for newly constructed dwelling units at length and in great detail; however, the omission of the same discussion with regards to industrial and commercial uses continues a trend of minimizing concern for industrial and commercial uses.

The RDEIR's discussion of water and wastewater capacity occurs on RDEIR Pages 3.3-42, -55. Although text within those pages generally acknowledges the potential for increased need for water capacity for commercial or industrial use, the lack of detail in those discussions is blatant when compared to similar discussions with regards to residential dwelling units.

IV. Concerns regarding RDEIR's discussion of maximum build-out potential and densities

a. Projected build-out density

The RDEIR states that “The estimated maximum feasible housing development potential of the General Plan Update land uses is far greater (38,972 housing units) than can reasonably be expected to be developed within the planning period of the General Plan (2016-2040)” (RDEIR 2-23). It also provides: “The proposed General Plan Update (GPU) establishes land use patterns and policies to guide development in a manner consistent with State law. The GPU has a 20 - 25 year planning horizon and there is more than enough allocated land use to meet projected demands for residential, commercial, and industrial uses during this period.” (RDEIR 2-9).

The fundamental assumption of the law is that general plans guide for future development within the plan area for a given plan period. There is no analysis or discussion in this RDEIR as to how the maximum growth levels stated above can be accommodated in an environmentally balanced way if the community or the populace of a given area experiences growth. Discussion of the General Plan should not be limited to projected levels of growth, but rather on the potential maximum build-out density. Though it may seem far-fetched at this point in time, growth to that level is possible. According to the RDEIR, the County's own policies, land use designations, and zoning allow for the maximum build-out to occur. The RDEIR must analyze the level of growth that the acreage in the county allows.

Furthermore, Table 2.5-1 shows that the anticipated need for housing units in the County's unincorporated areas at peak projected population is 1,721 units. In addition to concerns stated above regarding the need to account for increased or maximum potential growth should it occur, it is also highly likely that a significant number of those anticipated 1,721 units needed by 2028 have already been constructed without the knowledge of the County of Humboldt, primarily as result of cannabis cultivation in unincorporated areas and the construction of dwelling units and structures related to the support of those activities. While this is not an issue that the RDEIR or County need address directly, it underscores the danger of assumption when considering anticipated build-out levels.

b. Acreage for industrial and commercial use

Table 3.7-5 lists a total acreage of land planned for industrial uses by community planning areas for the IG and IR plan designations. However, that total only reflects the inland areas of the County. This is noteworthy, because in Section 3.4, Public Services, the RDEIR claims that there is sufficient land zoned for commercial and industrial uses in the County, but also states that the majority of that land is located in and around Humboldt Bay and/or the coastal zone.

The inconsistency arises when one considers that the RDEIR does not otherwise address any of the areas located in the coastal zone, instead deferring discussion of those areas to the Local Coastal Plan, yet opts to include them in its inventory of industrial and commercial land. If those areas are included in the General Plan or the RDEIR as areas that will likely undergo future development, they need be addressed and the impacts of that development accounted for.

A further illustration of the complexity and conflicting statements regarding the coastal zone can be found in Mitigation Measure 3.10.3.4.a (RDEIR pg. 3.1-35), which reads:

Mitigation 3.10.3.4.a. The following Safety Element implementation measure shall be added to require the County address new development in tsunami hazard areas:

***S-S7. Tsunamis.** New development below the level of the 100-year tsunami run-up elevation shall be limited to public access, boating, public recreation facilities, agriculture, wildlife management, habitat restoration, and ocean intakes, outfalls, pipelines, and dredge spoils disposal.*

While assuming that the above mitigation measure does not preclude private development in the tsunami run-up zone entirely, but rather would require such development to occur at elevation above the run-up elevation, this mitigation measure clearly illustrates an intent in the RDEIR to regulate activity in the coastal zone. However, the intent and attention to the coastal zone is not consistent throughout the RDEIR.

c. Cumulative Impacts

As an extension of the RDEIR's focus on an estimated need for development as compared to the maximum possible level of build-out density, section 5.2 of the RDEIR, Cumulative Impacts, also vastly underestimates the potentially massive impacts on public services that the General Plan may stand to produce.

The discussions of Impact 3.3.3 - Utilities and Services, Impact 3.3.3.2 - Water supply, Impact 3.4.3.1 - Schools, Impact 3.4.3.2 - Fire Protection, and Impact 3.4.3.3. - Law Enforcement are all based on the assumption of the RDEIR that relatively low-levels of development will occur. While this may be true, the fact is that the proposed General Plan's potential development impacts would leave all of these services woefully unable to cope with higher level of service demands.

V. Numerical and Table Inconsistencies

a. Available water and wastewater connections

The primary numerical inconsistencies identified within the RDEIR revolve around numerical differences in values set forth in narrative text and corresponding tables. The most prevalent inconsistency of that nature occurs in the RDEIR's discussion of the current and projected capacity of a number of Community Service Districts in various areas of Humboldt County.

For example, RDEIR Table 3.3-1 shows that the Loleta Community Services District has 258 water connections, and that there are an additional 56 water connections available. However, narrative text in the RDEIR found on page 3.3-15, "Loleta Community Services District," cites a 2008 LAFCo report which states that "The [Loleta Community Services] District believes that they can supply an additional 60-70 (40 to 50 based on Building Permit data as of 2016) homes." This apparent inconsistency in numbers is confusing, especially when one considers that the RDEIR does not mention the number of available connections for certain CSD's at all in the narrative text pertaining to those CSD's.

For example, Table 3.3-1 and Table 3.3-2 show that additional water and wastewater connections are available for a number of CSD's which are not reflected in the narrative text of the RDEIR.

To illustrate, Table 3.3-2 shows that the Garberville CSD has 353 existing wastewater connections, and that there are an additional 180 connections available. However, the RDEIR does not explicitly state that there are additional connections available for Garberville. The inconsistency between the numbers presented in Table 3.3-1 and Table 3.3-2 and as presented in corresponding narrative text, in addition to the inconsistency in which the capacity of individual CSD's, is confusing.

These two issues with consistency between RDEIR text and tables concerning the carrying capacity of water and wastewater districts apply to the following:

Garberville CSD, Weott CSD, Loleta CSD, Riverside CSD, Scotia CSD, Orleans CSD, Willow Creek CSD, Hydesville CWD, Orick CSD, Fieldbrook/Glendale CSD, RID (Shelter Cove), and Manila CSD.

b. Total available acreage

Table 3.2-3 shows total number of available acreage for lands designated T, AE, and AG. The table shows there are 897,026 available T-designated acres, 76,311 available AE-designated acres, and 377,838 available AG-designated areas, for a total of 1,351,175 available acres.

Those numbers are inconsistent as compared to tables 3.2-4 through 3.2-15, which provide total available acreage for lands designated T, AE, or AG, in specific and smaller geographic areas located in Humboldt County.

The totals for tables 3.2-4 through 3.2-15 show there are 893,840 available T-designated acres, 113,608 available AE-designated acres, and 381,846 available AG-designated acres, for a total of 1,389,294 available acres. This represents a 38,119 acre discrepancy between the tables.

c. Acreage for industrial use

RDEIR page. Table 3.7-5 (pp 7-21, -22) lists a total of land planned for industrial uses by community planning areas for the IG and IR plan designations. However, that total only reflects the inland areas of the county. This is noteworthy, because in section 3.4, Public Services, the RDIER makes the claim that there is sufficient land zoned commercial/industrial in the county – primarily in and around Humboldt Bay and/or in the coastal zone.

Further, the industrial acreages shown in Table 3.7-5 are inconsistent with those shown in Table 2.5-1 on page 2-24.

d. Incorrect table provided

RDEIR Pg. 3.7-21 through 3.7-23 contain numerous incorrect references to Table 3.7-4 Land Planned for Industrial Uses. Table 3.7-4 appears on 3.7-16 and is titled Summary of Humboldt County Risk Assessment. We assume that the incorrect references to Table 4.7-4 contained in RDEIR Pgs. 3.7-21 through 3.7-23 are meant to reference Table 3.7-5, found on Pg. 3.7-21.

VI. Mitigation Measures which do not meet CEQA/State EIR requirements

Paragraph 4 of the RDEIR, Page 1-2, Section 1.1.1 states:

All mitigation measures in the certified EIR will be incorporated into future actions carrying out the General Plan. To assist in the implementation of the General Plan Update, this EIR contains recommendations for some of the analysis that will be needed in the future. For example, this EIR establishes performance measures that would be applied for future projects when the County Issues permits and approvals required for those projects.

Of concern is that some of the “mitigation measures” listed throughout this Program EIR do not meet the criteria for mitigation as laid out in CEQA. Mitigation measures must be measurable or quantitative measures attainable in a reasonable time frame, and no mitigation can be deferred to another report or future action. Many of the “mitigation measures” in the RDEIR call for deferral or stipulate that future yet unspecified action will be taken to accomplish their mitigation goals.

In a number of instances, some items identified as “mitigation measures” are similar in wording to goals, policies, standards or implementation measures that were formally rejected by the planning commission in their review of the draft general plan update.

There is absolutely no objection to presenting the “mitigation” items in question which are currently identified as mitigation measures, but would more appropriately be identified as new or modified goals, policies, standards or implementation measures, to the Board of Supervisors for consideration and re-circulation; however, they should not be identified as mitigation.

In other instances, impacts are lacking mitigation measures where they require one. This often results from either relying on the efforts of other agencies or underestimating the level of significance to which an impact rises.

The following impacts lack mitigation measures: 3.3.3.1, 3.3.3.3, 3.4.3.1, 3.4.3.2, 3.4.3.3, 3.11.3.1, 3.11.3.3, 3.12.4.3, 3.13.4.1, 3.14.3.2, 3.15.3.2, 3.17.4.1, 3.17.4.2

The following items are mitigation measures which do not comply with CEQA requirements: 3.5.3.1a, 3.5.3.2a, 3.11.3.2, 3.11.3.5, 3.15.3.1, 3.15.3.1a, 3.16.3.1, 3.16.3.2, and 3.16.3.3a

The items which do not comply with CEQA requirements are shown, in full, in Appendix A of this document.

VII. Policies lacking Implementation Measures

There are a number of policies present in the General Plan that lack implementation measures which explicitly demonstrate the manner in which the aim of the policy is to be carried out. This is a defect per the state guidelines which dictate the requirements of a General Plan.

As it pertains to the RDEIR, it is our concern that policies which may have future impacts but lack implementation measures are difficult to evaluate from an EIR standpoint as there is no indication of what the impacts of carrying out that stated policy goal may be.

For example, consider Urban Lands - Policy P2:

“UL-P2. Streamlined Subdivision Approval. The County shall streamline the approval process for subdivisions located in designated Housing Opportunity Zones within Urban Development Areas.”

Without an implementation measure to accompany this policy, it is impossible to gauge whether the method by which the County shall streamline the approval process for the type of subdivision referenced above will have an impact at all, let alone whether that impact is significant.

Again, with regards to the RDEIR, the evaluation of UL-P2 is inadequate because the RDEIR has no stated or implied potential impact(s) arising from implementation which it can address.

Below is a list of all policies we were able to locate; potentially, there are policies which lack implementation measures which we did not identify remaining in the General Plan.

Policies lacking implementation measures:

GP-P10, UL-P2, UL-P9, UL-P11, UL-P15, UL-P17, UL-P18, UL-P19, UL-P20, UL-P21, UL-P21, RL-P1, RL-P2, RL-P3, RL-P4, RL-P6, RL-P7, AG-P2, AG-P7, AG-P9, AG-P11, AG-P12, AG-P13, AG-P14, AG-Px, AG-Pxx, FR-P8, FR-P9, FR-PX, FR-PX2, FR-P11, FR-P14, FR-PX3, FR-P16, FR-P19, IS-PX, IS-P20, IS-P21, C-P4, C-P5, C-P8, C-PX, C-P9, C-P10, C-P13, C-P17, CP-19, C-P27, C-P28, C-P30, C-P32, C-P35, C-P36, C-P?, C-P38, C-P39, C-P40, C-P41, C-P42, C-P44, C-P45, C-P47, C-PX8, ED-P3, ED-P7, ED-P8, ED-P9, ED-P10, ED-P11, ED-P18, ED-P5X, BR-P4, BR-P6, BR-P9, SR-PX, SR-P1, SR-PXX, WR-P1, WR-P2, WR-P4, WR-P5, WR-P6, WR-XX, WR-Px1, WR-P8, WR-P10, WR-P11, WR-P12, WR-Px7, WR-P18, WR-P20, WR-P25, WR-P27, WR-P28, WR-P29, WR-P29x, WR-P31, WR-P32, WR-P33, WR-P33, WR-P34, WR-P40, CO-P1x, CO-P1xx, CO-P4, CO-P7, CO-Px4, N-P1, N-P4, S-P1, S-P2, S-PX7, S-P6, S-P7, S-P8, S-PX1, S-P11, S-PX2, S-PX3, S-PX4, S-P13, S-P25, S-P26, S-P30, E-P2, E-P7, E-P9, E-P9x, E-P10, E-P13, E-P14, E-P15, E-PX2, E-PX3, AQ-P1, AQ-P2, AQ-P4, AQ-P5, AQ-P6, AQ-P7, AQ-P8, AQ-Px, AQ-P11, AQ-P12, AQ-P13, AQ-P15, H-P3, H-P6, H-P7, H-P10, H-P12, H-P13, H-P29, H-P30, H-P31.

A full list of these policies, including their full text, is included at the end of this document in Appendix B.

VIII. Concerns regarding the lack of an Implementation Action Plan

Per Government Code Section 65564, *“Every local open-space plan shall contain an action program consisting of specific programs which the legislative body intends to pursue in implementing its open-space plan.”*

The County has yet to produce an Implementation Action Plan. The general plan includes a placeholder for such a plan, but the failure to circulate the implementation action plan for public review renders the general plan update process inadequate. The public must be given the opportunity to evaluate the implementation action plan in light of the GPU and to provide comments on the implementation action plan. Until the implementation action plan is complete and provided for public review, the County cannot approve the GPU.

A thorough implementation action plan includes the following:

- The specifics of the mitigation measure and how it will be designated and implemented.
- Identify measurable performance standards by which the success of the mitigation can be determined.
- Provide for contingent mitigation if monitoring reveals that the success standards are not satisfied.
- Identify the agency, organization or individual responsible for implementing the measure.
- Identify the specific locations of the mitigation measure.

IX. Miscellaneous Issues

- A significant number of items in this RDEIR state certain policies, goals, implementation measures, etc., are to be given “priority” consideration, or are a “priority” of the plan. However, per the ruling of *Sierra Club v. Bd. Of Supervisors (1981) 126 Cal.App.3d 698, 704*, all sections, policies, goals, etc., of a plan must stand on equal footing and cannot be prioritized over or subverted by any other item of the plan. This is not to say that the word “priority” is impermissible as a whole, but is inappropriate in places which attempt to give priority to a policy, goal, or proposed action at the expense of another. A suggestion would be to simply alter the word “priority” to a similar descriptor, such as the word “focus”.
- A number of references are made to the Ridgewood Village Draft EIR, notably on page 3.4-18; it is our understanding that this document cannot be relied on in the RDEIR in any manner because the EIR for that project was never accepted or certified by the County of Humboldt.
- RDEIR Chapter 4, Evaluation of Plan Alternatives, does not address General Plan Alternative C. The beginning of Chapter 4 discusses the RDEIR's reasoning for precluding Alternative C; however, in light of CEQA requirements regarding discussion of plan alternatives, this seems to be a deficiency.

APPENDIX A – RDEIR REVIEW

Mitigation Measures which do not meet CEQA Requirements

Mitigation 3.3.3.2.a.: The following implementation measure shall be added to the Water Resources Element to ensure that water supply and availability is fully characterized within each watershed where such information is not adequately known:

WR-IMx. Water Supply Evaluation and Monitoring. Conduct watershed level evaluations within two years after the adoption of the General Plan Update to determine the long term surface and groundwater supply, including seasonal, average, dry year, and multiple dry year supplies, and beneficial uses of water to determine an estimate of the quantity of water available for future development. Work with water and wastewater related special districts, regulators, and other appropriate organizations to monitor watershed conditions.

Mitigation 3.5.3.1.a. The following policies shall be added to the Circulation Element and would require the implementation of transportation demand management programs with new larger scale development in the unincorporated area.

C-P3. Consideration of Transportation Impacts in Land Use Decision Making. Decisions to change or expand the land use of a particular area shall include an analysis of the impacts to existing and proposed transportation facilities and services so as to minimize or avoid significant operational, environmental, economic, and health-related consequences.

C-Px9. Regional Transportation Demand Management Funding. Encourage HCAOG to seek funding to support transportation demand management planning and to promote strategies that can lower the demands made on the road and highway system, reduce energy consumption, and improve air quality.

C-Px10. Transportation Demand Management Programs. Require residential subdivisions and multifamily development that would result in fifteen or more dwelling units, and non-residential development that would employ greater than ten persons, and that require a discretionary permit, to comply with County transportation demand management programs.

C-IMX6. Transportation Demand Management. Amend the Zoning Regulations to include criteria for the development and implementation of transportation demand management programs as required by this Plan.

Mitigation Measure 3.5.3.2.a. Amend existing policies and add the following implementation measure to the Circulation Element that establishes a multi-faceted program to lessen impacts relating to traffic congestion:

***C-Px. Countywide Traffic Impact Fee Program.** In coordination with the cities within the County, shall develop and implement a countywide traffic impact fee program that addresses impacts on major roads resulting from development in cities and unincorporated areas. Adopt this fee within one year of the adoption of the General Plan Update. A traffic impact fee is currently being evaluated for the Greater Eureka Area, encompassing the Eureka urbanized area.*

Mitigation Measure 3.11.3.2. Replace BR-S11 with the below definition of wetlands:

“BR-S11. Wetlands Defined. The County considers wetlands as lands transitional between terrestrial and aquatic systems where the water table is usually at or near the surface or the land is covered by shallow water. Wetlands must have all of the following three attributes: (1) at least periodically, the land supports hydrophytes, (2) the substrate is predominantly undrained hydric soil, and (3) the substrate is non-soil and is saturated with water or covered by shallow water at some time during the growing season of each year. An area is wetland if, under normal circumstances, (1) the area has continuous or recurrent saturation of the upper substrate caused by groundwater, or shallow surface water, or both; (2) the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and (3) the area’s vegetation is dominated by hydrophytes or the area lacks vegetation.”

Mitigation Measure 3.11.3.5.a. To avoid impacts to established Habitat Conservation Plan areas through direct conversion to other uses, the following policy shall be added to the Conservation and Open Space Element, Biological Resources section that states the following:

***BR-IM1. Biological Resource Maps.** The County shall maintain the best available data in the form of GIS maps for the location and extent of wetlands, critical habitats, streamside management areas, Habitat Conservation Plan Areas, rookeries, and ranges of species identified in the California Natural Diversity Database.*

Mitigation Measure 3.12.4.2: Add Implementation Measure AQ-IM7 to the Draft General Plan as follows:

AQ-IM7. Regulate the location and operation of land uses to avoid or mitigate harmful or nuisance levels of air emissions to the following sensitive receptors: residential uses, hospitals and nursing/convalescent homes, hotels and lodging, schools and day care centers and neighborhood parks. New development shall follow the recommendations for siting new sensitive land uses consistent with the ARB’s recommendation as shown in Table 3.12-4.

Mitigation 3.15.3.1.a. In order to protect existing parkland from deterioration that could result from development pursuant to the General Plan Update, the following Policies and Implementation Measures shall be added to the Community Infrastructure and Services Element:

***IS-Px. Parks Master Plan.** In cooperation with other park service providers, the County shall establish and maintain a Parks Master Plan that would assess current facilities within each inland and coastal planning area, determine appropriate locations for new facilities, and identify funding options.*

***IS-Sx. Interim Parks and Recreation Standards.** Parks and recreation standards contained in the Government Code Section 66477 shall be used as the standard for parkland dedication in the review of divisions of land for which a tentative map is required pursuant to Section 66426, until such time that the County has established parks and recreation standards for new development that differentiate between urban and rural settings; specify acreage of park land of 3 acres per 1,000 residents; and specify land dedication, in-lieu fee, or other mechanisms to fund park and recreation improvements and funding for operation and maintenance.*

Mitigation 3.16.3.1.a. Standard SR-SXXX, Scenic Highway Map, shall be added to the General Plan Update to reduce potential adverse impacts to scenic highways that could be caused by ministerial projects until SR-IM1, Mapping of Scenic Areas and Scenic Highways, is implemented:

***SR-SXXX. Scenic Highway Map.** Until such time as a General Plan Scenic Highway Roadway Map is prepared and adopted, Humboldt County Highways listed in Sections 263.1 through 263.8 of the California Streets and Highways Code shall be considered to be Scenic Highways pursuant to Policy SR-P3, Scenic Highway Protection, and the County shall address the potential for significant impacts to scenic resources during ministerial and discretionary permit review.*

Mitigation 3.16.3.2.a. The following policy would lessen potential impacts to natural amenities that are important to visual character:

***BR-Px. Landmark Trees.** Establish a program to identify and protect landmark trees, including trees that exhibit notable characteristics in terms of their size, age, rarity, shape or location.*

Mitigation 3.16.3.3.a . In order to minimize light trespass, light pollution, and glare, new development and projects that would make significant parking lot improvements or add new lighting would be required to prepare a lighting plan. The following new program would need to be added to the Scenic Resources Chapter of the Conservation and Open Space Element:

***SR-IMX Lighting Design Guidelines.** Amend the Zoning Regulations to include lighting design guidelines for discretionary projects. Require new development and projects that would make significant parking lot improvements or add new exterior lighting to submit a lighting plan consistent with these guidelines. Lighting design guidelines should address:*

A. Intensity – Acceptable standards shall be defined for various land uses and development types specifying the maximum allowable total lumens per acre.

B. Directional Control – Standards shall be developed to minimize the upward transmission and intensity of light at various distances from its source through the use of full-cutoff lighting, downward casting, shielding, visors etc.

C. Signage – Standards with respect to illuminated signs shall be developed that prohibit or limit the size, spacing, design, upward transmission of light, and hours of operation. In addition, signs should be white or light colored lettering on dark backgrounds.

D. Night Lighting – Hours of operation for various uses shall be specified in order to prohibit all night lighting except when warranted for public safety reasons. On demand lighting shall be encouraged.

E. Incentives – The County shall develop incentives for residents and businesses encouraging the conversion of existing lighting sources to compliant ones.

F. Enforcement – These standards shall be incorporated into the County Development Code and design review process for new development.

APPENDIX B – RDEIR REVIEW

Policies lacking Implementation Measures

Chapter 4. Land Use

<p>GP-P10. Conversion of Resource Lands. Parcels of timber site quality III or higher and prime agricultural lands suitable for resource production should not be included within Urban Expansion Areas unless the County makes a finding that there are no alternatives to increase the Urban Expansion Area on lands less suitable for resource production.</p>
<p>UL-P2. Streamlined Subdivision Approval. The County shall streamline the approval process for subdivisions located in designated Housing Opportunity Zones within Urban Development Areas.</p>
<p>UL-P9. Historic Structures. <u>Retain and restore significant</u> historic resources to serve as focal points of neighborhoods and communities.</p>
<p>UL-P11. Natural Amenities. Encourage <u>the incorporation</u> of natural amenities (i.e. landmark trees and rock outcroppings) into <u>their design new project designs</u></p>
<p>UL-P17. High Density Uses Near Parks. The County shall consider planning higher density mixed-uses and/or commercial uses adjacent to parks to promote park use and safety.</p>
<p>UL-P18. Traffic Calming. Traffic calming measures which emphasize pedestrian safety and convenience should be considered for all urban roadway designs. Possible traffic calming measures include chicanes, curb extensions, street trees and traffic circles.</p>
<p>UL-P19. Underground Utilities. Encourage and assist in undergrounding existing utilities.</p>
<p>UL-P20. Landscaping. All designs shall use landscaping to enhance the appearance of neighborhoods, control erosion, conserve water, improve air quality and improve pedestrian and vehicular safety.</p>
<p>UL-P21. <u>Marijuana Cultivation.</u> Cultivation of medical marijuana shall be regulated by ordinance to provide for the health, safety, and welfare of the community but shall not interfere with a patient's right to medical marijuana.</p>
<p>RL-P1. Compatible with Resource Production. Planned development on rural residential lands adjacent to designated agricultural and timberlands shall be compatible with agriculture and timber production</p>
<p>RL-P2. Water Withdrawal. Cumulative impacts of water withdrawal from surface and groundwater sources and cumulative impacts from on-site sewage disposal systems shall be assessed during the zoning and subdivision, and, in critical watersheds, any other discretionary review of development in all areas designated for rural residential development</p>

RL-P3. Rural Commercial Uses. New tourist, commercial, and retail outlets shall be located within the Rural Community Center land use designation or designated Community Planning Areas or other existing developed areas with development of a similar nature, unless the use meets rural cottage industry standards or is characteristic of, and compatible with, a rural setting.

RL-P4. Fire Safety Hazards. Support implementation of State Responsibility Area Fire Safe Standards and Wildland-Urban Interface Building Codes for new development and voluntary programs for fuels reduction, dwelling fire protection and creation of defensible space for existing development.

RL-P6. Rural Development in the King Range. All development within the boundaries of the King Range National Conservation Area shall be consistent with the Bureau of Land Management's Management Plan.

RL-P7. Clustered Rural Residential Development. Clustered rural residential development is encouraged on rural lands suitable for development consistent with planned densities. Density bonuses may be provided where significant permanent land dedications are secured.

AG-P2. Support Voluntary Purchase of Development Rights. The County shall support the voluntary purchase of development rights to provide income to farm operations and limit the intrusion of residential development into agricultural lands.

AG-P7. Agricultural Production in Conservation Areas. The County shall support continued agricultural production on lands placed into conservation easements or acquired by public agencies for conservation purposes. Enforceable provisions contained in terms of sale, deeds and conservation easements shall require continued management for agricultural production.

AG-P9. Predator Control. Support predator control programs that comply with federal, state and local laws in order to reduce livestock and other agricultural production losses.

AG-P11. Support Vegetative Management Programs. Support vegetation management programs (controlled burning, etc.) when it is found that they improve the availability and quality of rangeland for livestock and wildlife, reduce the hazard of disastrous wildfires, and increase water quality and quantity.

AG-P12. Advice from Agricultural Community. Seek advice from organizations and affected individuals within the agricultural community for any future evaluation of land areas needed for urban development or for any consideration of requests by Humboldt's Local Agency Formation Commission (LAFCo) to change spheres of influence or urban service boundaries next to or near agricultural lands.

AG-P13. Agricultural Zoning and Parcel Size. Utilize Agricultural Exclusive (AE) and Agricultural Grazing (AG) land use classifications to ensure appropriate parcel sizes and land use for continuing availability of the necessary agricultural land base.

AG-P14. Residential Uses on Timberland Production Zone (TPZ) Lands within Agricultural Preserves. Residential uses on TPZ lands within agricultural preserves shall be consistent with the requirements of the Williamson Act and local Williamson Act Guidelines.

AG-Px. Compliance with Regulations. The County shall place a priority on abatement of violations that result in agricultural land conversion, loss of agricultural productivity or conflicts with neighboring agricultural operations.

AG-Pxx. Protect Productive Agricultural Soils. Development on lands planned for agriculture (AE, AG) shall be designed to the maximum extent feasible to minimize the placement of buildings, impermeable surfaces or non-agricultural uses on land as defined in Government Code Section 51201(c) 1- 5 as prime agricultural lands.

FR-P8. Protection of High Quality Timberlands. Timberlands planned and zoned for timber production should be retained for timber production, harvesting and compatible uses, and reclassification of the Timberland Production Zones (TPZ) shall be done in accordance with the statutory requirements.

FR-P9 Residential Construction on TPZ Zoned Parcels. Recognize the right to construct a residence and accessory buildings under a ministerial permitting process County standard consistent with other Elements of the General Plan when the use does not detract from the growing and harvesting of timber and associated compatible uses.

FR-PX Secondary Residential Construction on TPZ Zoned Parcels. Second residential units may be allowed on TPZ parcels greater than 160 acres; and, may be allowed on TPZ parcel less than 160 acres as a conditional use only in the area already converted, intended to be converted, or that does not meet the definition of timberlands. Seconds units may be allowed on TPZ parcels less than 40 acres within Community Planning Areas.

FR-PX2 Landowner-initiated Rezoning of TPZ Parcels. Landowner-initiated rezoning of TPZ parcels shall be done according to state law (Section 51120 of the Government Code).

FR-P11. Lot Line Adjustments. Lot line adjustments of TPZ parcels may be approved in order to consolidate logical timberland management units or facilitate clustered residential development. Such adjustments shall be in keeping with the spirit and intent of TPZ and shall not result in a net reduction of the area of TPZ available for forest management unless a finding is made by the Board of Supervisors that it is in the public interest.

FR-P14. Public Utilities on TPZ Lands. Where feasible avoid locating federal, state, or local public improvements and utilities in TPZ where the project or land acquisition will have a significant adverse affect on the production of timber or ecosystem services.

FR-PX3. Transfer of Development Rights (TDR) Program. Research and develop, if feasible, a voluntary Transfer of Development Rights program as a method of protecting larger tracts of resource lands based on community input.

FR-P16. Compatible Uses. Lands adjacent to areas designated as Timberlands should be planned for uses compatible with timber management, including timber harvesting activities.

FR-P19. Maintain Public Roads. The County shall maintain public roads and drainage facilities to support log and forest products transportation.

Chapter 5. Infrastructure

IS-PX. Out of Area Service to Address Threats to Public Health. Encourage the Humboldt LAFCo to amend its policies and procedures to allow local agencies to provide new or extended services outside jurisdictional boundaries and outside spheres of influence to respond to existing or impending threats to the public health or safety, consistent with Government Code 56133, without requiring an annexation agreement.

IS-P20. On-Site Sewage Disposal Requirements. Maintain regulations governing construction and maintenance of on-site sewage disposal systems to protect health and safety and to reflect changes in state law and advances in treatment technologies. Recognize and allow the use of alternative onsite sewage disposal systems that meet state standards.

IS-P21. Parks and Recreation Service in Urban Development Areas. Encourage and support special districts to provide neighborhood parks and recreation services within Urban Development Areas.

Chapter 7. Circulation

C-P4. Mitigation Measures. Development with potentially significant circulation impacts as determined by CEQA review ~~shall~~ may be conditioned to proportionally mitigate such impacts through payment of impact fees, construction of on- and off-site improvements and dedication of rights-of-way or a combination of impact fees, improvements and dedications.

C-P5. Level of Service Criteria. The County shall strive to maintain Level of Service C operation on all roadway segments and intersections, except for of U.S. 101, where Level of Service D shall be acceptable. Level of Service improvements for automobiles should not adversely affect Level of Service and/or Quality of Service for other modes of transportation, if possible.

C-P8. Coordination Between County Agencies. County Public Works shall coordinate with Community Development Services and consider suggestions from other county departments to encourage uniform implementation of the Circulation Element and County-Wide Transportation Plan.

C-Px. Circulation Planning for Bicycles, Pedestrians and Transit. Circulation planning and project review shall include an assessment for bicycle, pedestrian and public transit access.

C-P9. Acceptance of Roads into the County Maintained Road System. Circulation Element roads, as specified by the County-Wide Transportation plan shall be recommended to the Board of Supervisors for inclusion into the County Maintained Road System. Other roads shall not be recommended for acceptance into the County Maintained Road System unless an exception for public interest is supported by Public Works and adequate funding for the future maintenance of the road and its associated facilities is provided.

C-P10. Rail Rights-of-Ways All Contiguous rail rights-of-way currently held by the North Coast Railroad Authority, and those along the former Annie and Mary Railroad rail corridor between Arcata and Blue Lake shall be planned Railroad in the Land Use Element.

C-P13. Prioritization of Investments. Use objective criteria consistent with this Plan that can be applied uniformly and countywide to prioritize transportation capital and maintenance expenditures. Work to reduce overall deferred maintenance liability. Subject to state law, maintenance of existing roads shall be a priority.

C-P17. Highway Improvements. Encourage state and federal highway improvements that promote safety and connectivity for all users, especially for communities with highway arterials.

C-P19. Best Management Practices for Road Grading. New development subject to The County shall periodically update its grading ordinance ~~shall use~~ to assure it is using best management practices prevent soil erosion and minimize impacts to watersheds from grading activities.

C-P27. Right-of-Way Design Standards. The County shall develop and include in the County-Wide Transportation Plan ~~r~~Right-of-way design standards shall incorporate the needs of all users consistent with urban, suburban, rural or remote community character. The County shall develop incentives for development of multi-modal facilities to offset any potential loss of developable land.

C-P28. Landscape Buffer Strips. The County Wide Transportation Plan shall provide landscape buffer strip standards as part of the road cross-section standards and according to the context of urban, suburban, rural and remote. Landscape buffer strips should be used, where feasible, to segregate pedestrian walkways from arterial and collector roadways.

C-P30. On-Street Parking. Design on-street parking to minimize conflicts with all users consistent with the County-Wide Transportation Plan. Where appropriate, creative on-street parking arrangements such as parking pockets or bays shall be considered to improve design flexibility.

<p>C-P32. Traffic Calming. Use traffic calming measures, where <u>feasible and</u> appropriate, as a means of improving safety for <u>all users</u>. Traffic calming measures <u>may</u> include, but are not limited to, roundabouts, chicanes, curb extensions, and traffic circles.</p>
<p>C-P35 Preservation of Railroad Right-of-Ways. The County shall work to preserve railroad rights-of-way as a contiguous corridor <u>for rail and other public transportation uses</u>.</p>
<p>C-P36. Develop a Regional Trails System. Support efforts to establish and connect regional trails, pThere is no implementation measure to illustrate how GP-10 would be implemented particularly in the greater Humboldt Bay and lower Mad River area, Eel River Valley, along the Avenue of the Giants and in the Klamath-Trinity area. The System should include the California Coastal Trail system and consist of multi-use trails where feasible.</p>
<p>C-P?. Encourage Bicycle and Pedestrian-Friendly development: Incentives should be given to developers who provide non-motorized facilities that connect neighborhoods in a design appropriate to the character of those neighborhoods.</p>
<p>C-P38. Channel Maintenance. Support continued maintenance of harbor channels to provide deep water access to existing and planned port facilities.</p>
<p>C-P39. Commercial Fishing Facilities. Support the improvement and modernization of facilities that provide support and access to markets for the commercial fishing industry.</p>
<p>C-P40. Public Infrastructure Supporting Private Investment. Support investments in public infrastructure that increase readiness and facilitate private initiatives and investment into port enterprises such as marine-dependent industrial use, boat building and repair facilities, fleet service facilities, tourism, recreation, and fish processing facilities.</p>
<p>C-P41. <u>Marine Transportation.</u> Encourage marine transport options, <u>and associated facilities</u>.</p>
<p>C-P42. Re-establishing Regional Rail Service. Support and encourage rail service in and out of the county and connected to other parts of the state <u>and the national rail system</u>. Public investment to re-establish regional rail service should be contingent on a private or public demand for sustained rail service and an analysis of net benefits to the County's economy, transportation systems, and environment.</p>
<p>C-P44. Expansion of Airline Service. The County shall work to sustain and expand commercial passenger airline and freight service to and from the County consistent with the Airport Master Plan and the economic development goals of the County.</p>

C-P45. Commercial Areas. Where feasible, commercial projects should be encouraged to develop inter-connecting traffic features with other commercial projects.

C-P47. Frontage Improvements. As properties are developed, all road frontages of the property shall be improved to the appropriate standard for the road according to the County-Wide Transportation Plan. Exceptions may be granted by the Planning Commission. Current standards will be used in evaluating frontage improvements until they are superseded by the approved Countywide Transportation Plan.

C-PX8. Discretionary Road Funds: First **priority** for discretionary road funds shall be used to address deferred maintenance.

Chapter 8. Housing

H-P3. Development of Properties in the Residential Land Inventory. The County shall encourage development of parcels in the residential land inventory for the current planning period at targeted residential density.

H-P6. Flexibly Apply Development Standards to Low Income Housing. The County shall support the flexible application of development standards through a streamlined permit process for housing for lower income affordability categories and special needs populations.

H-P7. Use of Surplus County-owned Property. The County shall consider using surplus County owned property for development or financing of housing for low income and special need populations. County-owned parcels developed with affordable housing shall be in close proximity to commercial areas and connected to them by pedestrian facilities and public transit

H-P10. Contributions to Infrastructure and Service Development. Market-rate housing pays its fair share of infrastructure and public service costs. Housing that has long-term affordability covenants and restrictions that require units to be available to, and occupied by, persons or families of low, very low or extremely low income at affordable housing costs for at least 20 years may be eligible for subsidies to pay for applicable infrastructure and public service costs.

H-P12. Residential Subdivision Permit Process. The County shall maintain an efficient, streamlined and predictable permitting process designed for residential subdivisions that meet the goals and policies of this Element.

H-P13. Expedited Residential Subdivision Review in Housing Opportunity Zones. The County shall streamline environmental review of residential subdivisions in Housing Opportunity Zones by establishing standardized maximum thresholds of significance.

H-P29. Reduce and Avoid Impacts to Biological Resources. Consistent with the mitigation measures in the Supplemental Environmental Impact Report (SCH#2009022077) the County shall refer all building permit applications that would result in the withdrawal of water from perennial streams or rivers, or from wells within 100' of a perennial stream or river, or from springs within 100' of a perennial stream or river to the Department of Fish and Wildlife (DF&W) for comments and recommendations.

H-P30. Conservation of Affordable Housing Damaged or Displaced by Indoor Marijuana Grows. The County shall earmark a minimum twenty percent (20%) of the net revenue from any future excessive energy tax toward programs for conservation of affordable housing.

H-P31. Maintaining an Adequate Land Inventory. Unless written findings are made pursuant to Government Code 65863 supported by substantial evidence, the County shall not allow a reduction in residential units in the residential land inventory below that specified in the current Regional Housing Need Allocation

Chapter 9. Economic Development

ED-P3. Affordable Housing. Promote housing at a price commensurate with income levels as reflected in the County Regional Housing Needs Allocation and a transportation system to provide efficient connectivity between housing and places of employment to minimize commute travel times and distances.

ED-P7. Broadband Internet. Support broadband improvements necessary to maintain the County's business competitiveness and serve remote communities.

ED-P8 Public Infrastructure. Assist local service providers in the pursuit of state and federal funding and development of land use assessment, rates and connection fee programs to upgrade and enhance infrastructure, including water, wastewater and recreational facilities.

ED-P9. Freight Mobility. Support pursuit of financial and technical solutions to improve interstate truck and rail access.

ED-P10. Rail. Support protection for the NCRA right-of-way and assets to preserve the ability to re-open the line in response to a demand for rail service.

ED-P11. Port Development. Support efforts to maintain and develop the port for shipping, the fishing industry, aquaculture, renewable energy, coastal-dependent and associated industries.

ED-P18. Higher Education. Support College of the Redwoods and Humboldt State University education and training programs that provide residents with the skills and knowledge to qualify for living wage careers and enhance the competitive edge of the industries in our region. Support K-12 educational programs that prepare students for careers in regional industries.

ED-P5X. Telecommuting and Workforce Development. Promote and seek resources to ensure that the county has a broadband infrastructure that encourages economic and workforce development and promotes telecommuting.

Chapter 10. Conservation and Open Space

CO-P1x. Transfer of Development Rights. Research and develop, if feasible, a voluntary transfer of development rights program as a method of protecting resource lands and open space based on community input.

CO-P1xx. Open Space Acquisition. The County seek consider opportunities to acquire high value open space lands, including community forests, and open space conservation easements from willing sellers.

CO-P4. Community Separation. Maintain separation of urbanized communities through appropriate land use designations and zoning density. Avoid merging urban development boundaries of adjacent communities.

CO-P7. Encourage Private Outdoor Recreation. Encourage private acquisition, development, and management of compatible outdoor recreational services and facilities as a means to generate economic returns for the landowner from conservation and open space lands where such recreational uses do not significantly detract from the agricultural capability or timber productivity of lands planned and zoned for agriculture or timber.

CO-Px4. Public Recreation. Support acquisition, development and management of parklands and trails primarily in locations that are highly accessible to the public in order to serve the outdoor recreation and ADA needs of current and future residents, and where such uses do not reduce the agricultural capability, timber productivity and ecological services on open space lands.

BR-P4. Development within Stream Channels. Development within stream channels shall be permitted when there is no lesser environmentally damaging feasible alternative, and where the best feasible mitigation measures have been provided to minimize adverse environmental effects. Development shall be limited to essential, non-disruptive projects as listed in Standard BR-S6 -Development within Stream Channels.

BR-P6. Development within Streamside Management Areas Development within Streamside Management Areas shall only be permitted where mitigation measures (Standards BR-S8 - Required Mitigation Measures, S9 - Erosion Control, and S10 - Development Standards) have been provided to minimize any adverse environmental effects, and shall be limited to uses as described in Standard BR-S7 - Development within Streamside Management Areas.

BR-P9. Invasive Plant Species. The County shall cooperate with public and private efforts to manage and control noxious and exotic invasive plant species. The County shall recommend measures to minimize the introduction of noxious and exotic invasive plant species in landscaping, grading and major vegetation clearing activities.

SR-PX Working Landscapes. Recognize the scenic value of resource production lands.

SR-P1. Development in *Mapped Scenic Areas*. In *mapped* scenic areas, new discretionary and ministerial development shall be consistent with and subordinate to natural contours, hilltops, tree lines, bluffs and rock outcroppings. Visible disturbance and interruption of natural features shall be minimized to the extent feasible.

SR-PXX Vandalism of billboards. If vandalism of legal nonconforming billboards requires repair or reconstruction, the billboard shall not lose its legal, nonconforming status, consistent with Humboldt County Zoning Code.

Chapter 11. Water Resources

WR-P2. Protection for Existing Surface and Groundwater Uses. Impacts on existing Basin Plan beneficial water uses shall be considered and mitigated during discretionary review of land use permits shall include mitigations for significant surface or groundwater resource impacts.

WR-P4. Critical Municipal Water Supply Areas. The Board of Supervisors shall designate all or portions of watersheds specific municipalities as "Critical Water Supply Areas" if cumulative impacts from land uses within the area have the potential to significantly impact the quality or quantity of municipal water supplies. Water resources within Critical Water Supply Areas shall be protected by the application of specific standards for such areas.

WR-P5. Critical Watershed Water Supply Areas. The Board of Supervisors shall designate all or portions of watersheds as "Critical Water Supply Areas" Watersheds" if cumulative impacts from ~~existing or planned~~ land ~~and water resource~~ uses within the area have been found via CEQA review to have the potential to possibly create significant environmental impacts to threatened or endangered species including Chinook salmon, Coho salmon or steelhead. ~~Land and~~ Water ~~resources~~ within Critical Water Supply Areas Watersheds shall be protected by the application of specific standards for such areas to avoid the unauthorized take of threatened or endangered species.

WR-P6. Subdivisions Water Supply for Residential Development. Any subdivision of land for residential development shall be conditioned to require evidence of sufficient water supply during normal and drought conditions to meet the projected demand associated with the proposed subdivision for residential development. Sufficient water supply shall include the requirements of the proposed subdivision and existing and planned future uses. Written service letters from a public water system written in conformance with this policy is sufficient evidence. Subdivisions to be served through on-site water supplies or private water systems must provide evidence of sufficient water supply to the County Department of Environmental Health.

There is no implementation measure to illustrate how GP-P10 would be implemented.

WR-Pxx. Funding. Coordinate with local, state and federal agencies, and conservation and watershed restoration related organizations, to identify and obtain sources of funding for water quality enhancement, fish passage projects, stormwater **pollution management, and water conservation efforts.**

WR-Px1. Requirements for Water Storage in Flow Impaired Low Water Supply Areas. Watersheds. New development not served by a public water system that seeks to rely upon surface water shall install water storage capable of providing 100 percent of the necessary water storage volume for the summer low-flow season (e.g. July-August-September). A forbearance agreement prohibiting water withdrawals during low-flow season shall be included as a performance standard for the project.

WR-P8. Erosion and Sediment Discharge. Ministerial and discretionary projects requiring a grading permit shall comply with performance standards adopted by ordinance in the County Grading Ordinance and/or conditioned to minimize erosion and discharge of sediments into surface runoff, drainage systems, and water bodies consistent with best management practices, adopted Total Maximum Daily Loads (TMDLs), and non-point source regulatory standards.

WR-P10. Project Design. Development should be designed to compliment and minimize significant adverse impacts to not detract from the function of rivers, streams, ponds, wetlands, and their setback areas.

WR-P11. Small and Micro Hydroelectric. , If during a CEQA review for a Conditional Use Permit for a small hydroelectric development (where less than 5 kilowatts of power is generated) that includes plans for an off-site power destination/use, the potential for impacts to surface water flows, aquatic species, and habitat are discovered, such impacts shall be adequately mitigated to be in conformity with state and federal permits and standards.

WR-P12. Groundwater Quality Protection. Commercial and industrial discretionary uses shall be evaluated for their potential to contaminate groundwater resources, and mitigated as necessary.

WR-Px7. Rain Catchment Systems. Encourage the installation of rain catchment systems to support domestic and outdoor water needs during low-flow summer months.

WR-P18. Watershed and Community Based Efforts. Support the efforts of local community watershed groups to promote water conservation and restoration.

WR-P20. State and Federal Watershed Initiatives. Support Acknowledge implementation of state and federal watershed initiatives such as the Total Maximum Daily Loads (TMDLs), the North Coast Regional Water Quality Control Board's (NCRWQCB) Watershed Management Initiative, the National Marine Fisheries Services and Department of Fish and Game coho recovery plans and the California Non-Point Source Program Plan.

WR-P25. New Water Diversion Projects. Review and make recommendations on significant new water diversion projects to ensure that they do not reduce the replenishment rate of in-stream gravel, taking into account the impact the projects would have on local mineral supplies in Humboldt County.

WR-P27. County Needs. Any consideration of exporting additional water resources shall place primary priority upon the benefit of and need for the water resources in the county and shall ensure that water needed by water users and natural resources will not be exported outside the county.

WR-P28. Public Trust Resources and Interests. The County should support shall advocate that dam relicensing projects by the P.U.C. , the F.E.R.C., and the State Water Resources Control Board balance redress the historical over-emphasis on development values (electric power, flood control, and water supply) with at the expense of non-developmental values (environmental resource protection, habitat restoration, and water quality).

WR-P29. Public Input. The County shall advocate for the relicensing applicant to sponsor a participatory process involving all affected stakeholders prior to the submittal of a final relicensing application to the Federal Energy Regulatory Commission.

WR-P29x Implementation of NPDES Permit. Implement and comply with the National Pollutant Discharge Elimination Systems (NPDES) Permit issued by the State Water Resources Control Board to the designated portions of the County.

WR-P31. Downstream Stormwater Peak Flows. Peak downstream stormwater discharge shall not exceed the capacity limits of off-site drainage systems or cause downstream erosion, flooding, habitat destruction, or impacts to wetlands and riparian areas. New development shall demonstrate that post-development peak flow discharges will mimic natural flows to watercourses and avoid impacts to Beneficial Uses of Water.

WR-P32. New Drainage Facilities. Where it is necessary to develop additional drainage facilities, they shall be designed to be as natural in appearance and function as is feasible. All drainage facilities shall be designed to maintain maximum natural habitat of streams and their streamside management areas and buffers. Detention/retention facilities shall be managed in such a manner as to avoid reducing stream flows during critical low-flow periods.

WR-P33. Restoration Projects. The County shall encourage restoration projects aimed at reducing erosion and improving habitat values in Streamside Management Areas and wetlands while maintaining Agricultural Resource values.

WR-P34. Commercial and Industrial Activities. For commercial and industrial development, the need for drainage facilities shall be as a result of a referral by the Land Use Division of Public Works and installed/constructed on a case by case basis to the satisfaction of the Land Use Division of Public Works per the County Grading, Subdivision and LID ordinances. No such requirements are to be applied to forests or ranchlands.

WR-P40. Fish Passage Designs. Work with federal and state agencies and local watershed restoration groups to retrofit existing drainage and flood control structures and design new structures to facilitate fish and other wildlife passage in partnership with federal and state agencies.

Chapter 13. Noise

N-P1. Minimize Noise from Stationary and Mobile Sources. Minimize stationary noise sources and noise emanating from temporary activities by applying appropriate standards for average and short-term noise levels during permit review and subsequent monitoring.

N-P4. Protection from Excessive Noise. Protect persons from existing or future excessive levels of noise which interfere with sleep, communication, relaxation, health or legally permitted use of property.

Chapter 14. Safety

S-P1. Reduce the Potential for Loss. Plan land uses and regulate new development to reduce the potential for loss of life, injury, property damage, and economic and social dislocations resulting from natural and manmade hazards, including but not limited to, steep slopes, unstable soils areas, active earthquake faults, wildland fire risk areas, airport influence areas, military operating areas, flood plains, and tsunami run-up areas.

S-P2. Coastal Zone Hazards. Development within the coastal zone shall minimize risks to life and property in areas of high geologic, tsunami, flood, and fire hazard; assure stability and structural integrity; and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding areas or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.

SPX7. Military Operating Areas. Provide notification and project information to the military for discretionary development projects within military airspace operating areas as may be required by the California Government Code.

S-P6. Structural Hazards. The County shall protect life and property by applying and enforcing state adopted building codes and Alquist-Priolo requirements to new construction.

S-P7. Improved Information. Encourage and support more detailed scientific analysis of Cascadia Subduction Zone earthquake risks, probabilities, and anticipated effects.

S-P8. Earthquake Mitigation Planning. The potential for a local earthquake in excess of magnitude 9.0 (Richter scale) shall be considered in disaster planning, risk assessment, and pre-disaster mitigation efforts.

S-PX1. Site Suitability. New development may be approved only if it can be demonstrated that the proposed development will neither create nor significantly contribute to, or be impacted by, geologic instability or geologic hazards.

S-P11. Flood Plains. Agricultural lands that are in mapped floodplains shall be retained for use in agriculture.

S-PX2. Prohibition of Residential Subdivisions within Floodplain. The creation of new parcels that increase residential density wholly within the 100 year floodplain, as identified in the most recent FEMA flood insurance rate maps, shall be prohibited unless the Board of Supervisors makes specific findings that the potential for loss of life and property can be reduced to less than significant levels.

S-PX3. Construction Within Special Flood Hazard Areas. Construction within a floodplain identified as the 100-Year Flood Boundary on FEMA's Flood Insurance Rate Map shall comply with the County's Flood Damage Prevention Regulations. Fill in the floodplain shall only be allowed if it can be demonstrated that the fill will not have cumulative adverse impacts on or off site and such fill shall not be detrimental to productive farm land, and is otherwise in conformance with the County's Flood Damage Prevention Regulations

S-PX4. Development on, or Adjacent to, Coastal Bluffs and Beaches. Allow development in areas immediately adjacent to coastal bluffs and beaches only if it can be demonstrated by a certified engineering geologist that wave action, storm swell, tsunami inundation, and projected sea level rise using the best available scientific information and at the time of review, are not a hazard to the proposed development.

S-P13. Subdivision Design in High and Very High Fire Hazard Zones. Subdivisions within State Responsibility Area (SRA) high and very high fire severity classification areas shall explicitly consider designs and layout to reduce wildfire hazards and improve defensibility; for example, through clustering of lots in defensible areas, irrigated green belts, water storage, perimeter roads, roadway layout and design, slope development constraints, fuel modification plans, and vegetation setbacks.

S-P25. Hazardous Industrial Development. Hazardous industrial development may be permitted when:
A. It includes mitigation measures sufficient to offset increased risks to adjacent human populations and the environment; and,
Increased risks to adjacent human populations and the environment have been adequately mitigated by approved disaster response plans. (See definition of "hazardous industrial development" in Standards Section below).

S-P26. Hazardous Waste. Eliminate the use of toxic materials within Humboldt County, where feasible, and require the reduction, recycling, and reuse of such materials, to the greatest extent possible, where complete elimination of their use is not feasible. Require new development which may generate significant quantities of hazardous wastes to provide a plan for disposal which emphasizes on-site treatment, neutralization, and recycling.

S-P30. Tsunami Ready Program. The County shall support efforts of low-lying coastal communities to attain Tsunami Ready™ status, as developed by the National Weather Service.

Chapter 12. Energy

E-P2. Oil and Gas Development. Oil and gas development shall be permitted consistent with the following:

- A. The development is performed safely and is consistent with the geologic conditions of the well site.
- B. New or expanded facilities related to such development are consolidated, to the maximum extent feasible and legally permissible, unless consolidation will have adverse environmental consequences and will not significantly reduce the number of producing wells, support facilities, or sites required to produce the reservoir economically and with minimal environmental impacts.
- C. Such development will not cause or contribute to subsidence hazards unless it is determined that adequate measures will be undertaken to prevent damage from such subsidence. Hydraulic fracturing for release and recovery of hydrocarbons is prohibited.

E-P7. County Government Energy Consumption. The County government shall reduce building and transportation energy consumption by implementing energy conservation measures and purchasing renewable energy and energy efficient equipment and vehicles whenever cost-effective. Conservation and renewable energy investments should be planned and implemented in accordance with performance-based action plans and County Greenhouse Gas Emission Reduction goals.

E-P9. Electrical Transmission. Promote PG&E funded capacity upgrades to electric distribution lines to facilitate distributed renewable energy production and electricity export from the county.

E-P9x. Electricity Buyback. Support revisions to the electricity buyback program that encourages more distributed local generation and more equitably compensates such generation.

E-P10. Transportation Management Plans. Major commercial, business, or industrial, facility developments shall be required to submit a transportation management plan that addresses energy conservation measures such as connectivity to alternative transportation modes; preferential parking for carpools, vanpools, motorcycles, mopeds, and bicycles; shuttle services; alternative fueling stations; transit passes; bike lockers; and locker-room facilities. Develop incentives for projects not deemed as major that incorporate such energy conservation measures.

E-P13. Water Efficiency. Promote the efficient use of water in residences, businesses, industries, and agriculture.

E-P14. Incentives for Using Alternative Energy. Encourage the use of renewable energy and environmentally preferable distributed energy generation systems in the county.

E-P15. Wind Renewable Energy Overlay Zones. Develop renewable ~~develop~~ a wind energy overlay zones based on community input to protect ~~potential wind energy~~ the unique value of sites that are identified as having substantial ~~wind~~ renewable energy potential and/or will be critical for renewable energy infrastructure while still allowing uses permitted in the underlying zone.

E-PX2. Sustainable Biomass Energy Production. Coordinate with local agencies, communities, and landowners to develop biomass energy plans that are consistent with forest management, hazardous fuels reduction, and restoration needs and priorities.

E-PX3 Residential Design "for Solar Access". Proposed single-family residential structures should be designed to maximize solar access, energy conservation and passive solar energy generation. Solar access potential should be evaluated based on each climate zone within the County as established by the National Weather Forecast Center in Eureka.

Chapter 15. Air Quality

AQ-P1. Reduce Length and Frequency of Vehicle Trips. Reduce the length and frequency of vehicle trips through land use and transportation policies by encouraging mixed-use development, compact development patterns in areas served by public transit, and active modes of travel.

AQ-P2. Reduce Localized Concentrated Air Pollution. Reduce or minimize the creation of "hot spots" or localized places of concentrated automobile emissions.

AQ-P3. Fireplace and Woodstove PM₁₀ Emissions. Support incentives to minimize emissions from fireplaces and woodstoves.

AQ-P4. Construction and Grading Dust Control. Dust control practices on construction and grading sites shall achieve compliance with NCAQMD fugitive dust emission standards.

<p>AQ-P5. Air Quality Impacts from New Development. During environmental review of discretionary permits, reduce emissions of air pollutants from new commercial and industrial development by requiring feasible mitigation measures to achieve the standards of the NCAQMD.</p>
<p>AQ-P6. Buffering Land Uses. During environmental review of discretionary commercial and industrial projects, consider the use of buffers between new sources of emissions and adjacent land uses to minimize exposure to air pollution.</p>
<p>AQ-P7. Interagency Coordination. “Coordinate with the NCAQMD early in the permit review process to identify expected regulatory outcomes and minimize delays for projects involving: . . . “</p>
<p>AQ-P8. Reduce Air Quality Impacts from Wildfires. Support and encourage fire suppression of wildfires that may have an acute air quality health impact on local population centers.</p>
<p>AQ-Px. Review of Projects for Greenhouse Gas Emission Reductions. The County shall evaluate the GHG emissions of new large scale residential, commercial and industrial projects <u>for compliance with state regulations</u> and require feasible mitigation measures to minimize GHG emissions.</p>
<p>AQ-P11. Forest Sequestration and Biomass Energy. Provide incentives for increased carbon sequestration on forest lands and encourage the reduction of smoke production through the utilization of excess forest biomass for sustainable energy generation and other uses.</p>
<p>AQ-P12. Solar Electric System Capacity. Encourage and provide incentives to increase solar-electric capacity in residential, commercial, and industrial sectors.</p>
<p>AQ-P13. Energy Efficient Building Design. Encourage and provide incentives for construction of buildings and energy saving measures beyond Title 24 requirements for residential and commercial projects.</p>
<p>AQ-P15. Preservation and Replacement of On-site Trees. Projects requiring discretionary review should preserve large trees, where possible, and mitigate for carbon storage losses attributable to significant removal of trees.</p>

7-29-17

OBJECTION OR CONCERNS REGARDING

THE GENERAL PLAN UPDATE EIR.

THE EIR FAILS TO ADDRESS THE FACT

THAT MARIJUANA IS A SCHEDULE I SUBSTANCE

ACCORDING TO THE FEDERAL GOV.

THE GENERAL PLAN ALLOWS, FACILITATES, AND

ENABLES TAXATION OF A FEDERAL CRIMINAL

ACT WITHOUT ADDRESSING THE CONSEQUENCES

OF DOING SO. INCLUDING BUT NOT

LIMITED TO ENVIRONMENTAL, SOCIOECONOMIC,

HEALTH, AND COSTS RELATED TO THE ABOVE.

KENT SAWATZKY

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*Making Conservation
a California Way of Life.*

June 30, 2017

1-HUM-General
SCH# 2007012089
Humboldt GPU DEIR

Mr. Michael Richardson Supervising Planner
Community Development Department
County of Humboldt
3015 H Street
Eureka, CA 95501

Dear Mr. Richardson:

Thank you for including Caltrans in the environmental review process for the Recirculated Draft Environmental Impact Report (RDEIR) for the Humboldt County General Plan Update (GPU). The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Caltrans Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans through the lens of our mission and state planning priorities of infill, conservation, and travel efficient development. To ensure a safe and efficient transportation system, we encourage early consultation and coordination with lead agencies and project proponents on all development projects that utilize the multimodal transportation network. We provide these comments consistent with the State's smart mobility goals that support a vibrant economy and build communities, not sprawl. The following comments are in response to the Draft EIR for the Humboldt County GPU.

Caltrans' mission and vision, as well as a number of goals and policies, have been revised to better reflect recent legislation including the following:

Assembly Bill (AB) 857, **Infrastructure Planning: Priorities and Funding** (2002), requires the State to adopt consistent planning and capital spending priorities. It establishes three priorities that encourage all state agencies to promote infill development within existing communities, protect environmental and agricultural resources, and encourage efficient development patterns overall.

Assembly Bill 32, **The California Global Warming Solutions Act of 2006**, mandates a reduction of Greenhouse Gas (GHG) emissions most responsible for climate change. Nearly 40 percent of emissions in California come from the transportation sector.

The **Sustainable Communities and Climate Protection Act of 2008**, or Senate Bill (SB) 375, legislation that required regions throughout California to improve their long-term Regional Transportation Plans (RTPs) to reflect more efficient land use, improved transportation, and

reduced GHG emissions.

Assembly Bill 1358 (2008), the California **Complete Streets Act**, requires that the legislative body of a city or county, upon any substantive revision of the circulation element of the general plan, modify the circulation element to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban, or urban context of the general plan.

Senate Bill 391 (2009), **California Transportation Plan**, adds new requirements to meet California's climate change goals under Assembly Bill 32. SB 391 requires the state's long-range transportation plan (California Transportation Plan) to identify the "statewide integrated multimodal transportation system" needed to reduce greenhouse gas emissions from current levels by 2020, and 80-percent below the 1990 levels by 2050.

Senate Bill 743 (2013), "**The Kings Arena Bill**", exempted the Sacramento Kings Arena from CEQA compliance and attempts to promote infill development through a change in how determinations of significance are measured for transportation impacts under CEQA. New housing, commercial and office uses located within Transit Priority Areas are now exempt from CEQA. Outside of Transit Priority Areas, the Governor's Office of Planning and Research has the discretion to identify new measures of significance for determining transportation impacts under CEQA, which is expected to include Vehicle Miles Traveled (VMT).

In April of 2015, Governor Brown issued **Executive Order (EO) B-30-15** establishing a California GHG reduction target of 40 percent below 1990 levels by the year 2030, which is a mid-term goal that is consistent with California's existing long-term commitment to reduce emissions 80 percent under 1990 levels by 2050. In addition, the Governor is committed to reduce by one-half current petroleum use in cars and trucks; and manage farm and rangelands, forests and wetlands to store more carbon.

In 2016, Caltrans completed California Transportation Plan 2040, which establishes a new model for developing ground transportation systems, consistent with the above-referenced legislation:

[Regional] plans represent a shift in long-term planning away from simply a list of transportation projects and towards a strategy for sustainable growth. Their plans value efficient land use by proposing to locate more housing closer to job centers; they recognize consumer demand by proposing to invest in numerous modes of transportation—roads, public transit, walking, and biking facilities. They value taxpayer investments by proposing to spend more on taking care of our existing assets before building more. Regions have adopted growth plans, and will soon begin revising them, to deliver the more sustainable transportation system now required by California law.

Over the next 25 years, California will be working to improve transit, reduce long-run repair and maintenance costs of roadways, developing a comprehensive assessment of climate-related vulnerabilities, and improving the efficiency of operations on existing facilities using transportation demand management and new technologies rather than continuing to expand capacity on existing roadways.

We request that the Humboldt County General Plan Update strive to address transportation challenges including: transportation needs of demographic groups, specifically the youth, the aging, and low-income groups or areas that qualify for State “disadvantaged” or “severely disadvantaged” status. Suggested methods for providing a more robust transportation system include the expansion of transit capacity, frequency, and connectivity; higher proportion of funding for walking and biking projects; greater focus on more efficient land uses and denser development near transit; support for streamlined CEQA review of infill projects; and greater coordination between government and stakeholders.

We agree with and support the County’s determination of significant and unavoidable VMT impacts within the Circulation Element of the RDEIR. With respect to VMT impacts, we have the following comments:

- Increasing VMT, whether on a per capita basis or as an absolute value, is inconsistent with State efforts to reduce GHG. County land use decisions have the potential to impact State efforts to reduce VMT on State highways.
- The “Area of Known Controversy” related to dispersed versus compact development in the General Plan Update could lead to significant impacts as a contributing factor to increasing VMT.
- Without existing or proposed Measures of Effectiveness (MOEs) for reducing VMT, we request that the County, through the implementation of the General Plan, seek to maintain consistency between the Circulation Element of the General Plan, California Transportation Plan 2040, the Regional Transportation Plan developed by Humboldt County Association of Governments (HCAOG), the Regional Transportation Planning Agency (RTPA) for Humboldt County.

We request that the County work with Caltrans and HCAOG to establish meaningful VMT reduction strategies.

Page 3.5-9 of the Transportation Section of the Revised Draft Environmental Impact Report describes State Route 299 as a California Legal Network Highway that allows STAA (Surface Transportation Assistance Act) trucks. Please note that with the completion of the Buckhorn Grade projects in Shasta County last fall, SR 299 is in the process of being designated an STAA Terminal Access Route.

Also on page 3.5-9 of the Transportation Section is a discussion of the Caltrans project through

Mr. Michael Richardson
6/30/2017
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Richardson Grove State Park. We request that the RDEIR's description of the project be revised for clarity. Instead of attributing the controversy to the removal of trees (no old growth trees will be removed), the controversy can be attributed to "road improvements within a grove of old growth redwood trees, as well as concerns regarding growth inducing impacts."

Caltrans requests to participate in the County's update of the Local Coastal Program in an effort to coordinate long-range planning efforts for adapting to Sea Level Rise. Caltrans District 1 is interested in the Humboldt Bay Area Plan and other planning areas where State highway facilities are vulnerable to the effects of Climate Change.

Caltrans offers a number of planning grants to assist the County in working to further State goals and initiatives recently established through legislation. Please visit the Caltrans Division of Transportation Planning web page, which includes a tab for grant programs:
<http://www.dot.ca.gov/transplanning/index.html>.

If you have question on our comments or need further assistance, please contact me at the number above or contact Kevin Tucker, Chief, Caltrans District 1 Office of Transportation Planning North at (707) 441-5770.

Sincerely,



JESSE ROBERTSON
Transportation Planning
Caltrans District 1

c: Marcella Clem, Humboldt County Association of Governments



Humboldt County Planning and Building Department
3015 H Street
Eureka, CA. 85501
Attn: Michael Richardson

P.O. Box 624, Fortuna, CA. 95540

Directors:

Dave Feral
Feral Family Farm

Paul Giuntoli
Warren Creek Farm

Portia Bramble

John Gary
Organic Matters Ranch

Clif Clendenen
Clendenen's Cider Works

Kevin & Melanie Cunningham
Shakefork Community Farm

Erin Derden-Little

Jacque and Amy Newkom
Newkom Family Farm

Mel Krieb
Flood Plain Produce

Martha Spencer MS
Natural Resource Planner

Jared Zystro PhD
Plant Breeder and Geneticist

John LaBoyteaux
Camp Grant Family Farm

RE: GPU—RDEIR

Dear Michael:

This group of local industry experts and representatives believes that Humboldt County planning policies, both past and present, have never recognized the unique and diverse agricultural productivity of inland regions of the County as compared to the well known dairy lands around Humboldt Bay.

A mountainous and forested county, Humboldt has multiple agricultural districts, with excellent agricultural soils where much of the regions' food production is currently taking place. These areas are different from the well known dairy lands around Humboldt Bay. These inland areas have a longer growing season, support a wide diversity of crops, and have developed their own transportation systems and market opportunities.

Walk down the line at multiple farmers markets throughout the County and note where the farms are located. Orleans, Willow Creek, Blue Lake, Jacoby Creek, Carlotta, the Van Duzen, Mid-Eel, and Mattole Valleys, Ettersburg, Phillipsville, Garberville and more. The fertile lands in these areas are sought by the farmers raising the wide variety of crops that support a vibrant local food system. Some farmers in these areas also export crops to out of County markets.

Focused mostly on timber, dairy and cattle, neither the 1984 Framework Plan nor the GPU recognizes these areas for their unique and important agricultural contribution to the County. While the 60 acre minimum parcel for AE lands is universally supported by Humboldt agriculture, most all of the agricultural conversions, through land use designation changes in the GPU, are located in these more inland agricultural districts.

The new "Residential Agriculture" designation, like its predecessors "Agricultural Rural" and "Agriculture Suburban" is a residential designation. These designations are intended to provide first for residential development and do not recognize the unique value and productivity of prime agricultural soils. Retaining those soils in units large enough to sustainably support a wide range of agricultural crops, is not the purpose of these designations.

On existing smaller parcels of prime soil, allowing two residential units by right within a three acre curtilage may remove agriculture from the parcel entirely. Agricultural parcels cannot be equated with TPZ parcels which are generally larger overall.

Food, Fiber and Flowers requests, as an implementation measure in the GPU, that the County identify and inventory prime agricultural soil parcels within the agricultural districts listed above and any other unique locations throughout the County.

Thank you.

John LaBoyteaux

June 29, 2017

Via Hand Delivery and Email

Michael Richardson, Senior Planner
County of Humboldt
Planning and Building Department
3015 H Street, Eureka, CA 95501
Email: mrichardson@co.humboldt.ca.us



Re: Green Diamond Resource Company comments; Revised Draft EIR and the Appendices for the Humboldt County General Plan Update.

Dear Mr. Richardson,

With this letter Green Diamond Resource Company, a Washington corporation ("GDRCo"), respectfully submits comments regarding the Humboldt County General Plan Update Revised Draft EIR (RDEIR) and the Appendices. GDRCo's comments are specific to the project analyzed in the RDEIR, described on page 2-1 of the RDEIR in **Chapter 2. Project Description**, as follows:

"The project analyzed in this recirculated and revised draft Environmental Impact Report (RDEIR) is the proposed Humboldt County General Plan (referred to as the proposed General Plan Update (GPU)). The text reflects the Board of Supervisors Markup Draft from October 19, 2015. The proposed General Plan includes goals, policies, standards, implementation measures, and land use maps as recommended by the Planning Commission. This draft, reviewed by the Planning Commission, was evaluated in the April 2, 2012 Draft Environmental Impact Report. During public hearings between June, 2012 and March, 2016, the Board of Supervisors has made modifications, additions, and deletions to that draft. The RDEIR is focused on environmental effects which may reasonably be expected to occur during the 24-year planning period of the GPU, 2016-2040, as detailed in subchapters 2.1 and 2.5 below."

Furthermore, as discussed in detail below, GDRCo's comments are submitted based upon the opinion and position that the RDEIR, the Natural Resources and Hazards Report (Sept. 2002 draft) (Appendix D to the RDEIR), and the Forest Resources Report (Oct. 2003 draft) (Appendix F to the RDEIR) all incorrectly characterize the process of recognizing and/or determining the scope and extent of "legal parcels" and/or adjusting parcel boundaries (without creating "new" parcels) under the California Subdivision Map Act (California Government Code §§ 66410, et seq.) as acts of "conversion" and/or "subdivision" of timberlands. Specifically, the RDEIR and cited Reports conclude, without support or justification, that the Determination of Status process, the Certificates of Compliance process, the recognition of Patent Parcels, and Lot Line Adjustments under the Subdivision Map Act constitute a conversion and/or subdivision of timberlands for purposes of assessing environmental impacts. As discussed in detail in Attachment A to these Comments and the legal opinion appended as Attachment B, these conclusions and the general commentary on the subject included in the RDEIR are not supported by substantial evidence, materially contradict the conclusions reached in studies commissioned and cited as support for the RDEIR, and misstate the findings reached by California resource agencies when reviewing the issue.

Lastly, GDRCo has submitted requests for land use designation changes throughout the General Plan Update process. In reviewing the Map Book (Appendix F to the RDEIR - Planning Commission Draft) and the associated County GIS land use maps, many of these land use designation changes have been incorporated but some discrepancies remain, and those are identified in these Comments. Specifically, Attachment C to these Comments summarizes the discrepancies identified and provides what GDRCo believes to constitute the correct land use designation changes for each affected parcel based upon the Board of Supervisors' Draft General Plan Update and previous work during the Update process.

Sincerely,

Green Diamond Resource Company

By:  _____

Neal D. Ewald
Senior Vice President, California Operations

Attachment A

GDRCo Comment	Page	Comment
#1	3.2-11	<p>Beginning with the second paragraph on page 3.2-11, the RDEIR makes an unsubstantiated statement regarding timberland “conversion”. Specifically, the RDEIR characterizes the Determination of Status and Certificate of Compliance process established for recognizing legal parcels of land under the California Subdivision Map Act (California Government Code §§ 66410, et seq.) (the “Subdivision Map Act”) to constitute acts of “converting” and/or “subdividing” timberlands. This is incorrect and a misstatement of fact. The incorrect characterization of what constitutes “timberland conversion” is repeated in multiple locations in the RDEIR and portions of the RDEIR materially misstate the reports cited in support of the discussion regarding Forest and Agricultural resources.</p> <p>Although GDRCo acknowledges that timberland conversion can certainly occur as part of new subdivisions and associated zoning reclassifications and General Plan amendments, timberland conversion does not occur through the Certificate of Compliance process. The Certificate of Compliance process is simply the procedure to determine the baseline parcel status of units of land, subject to conveyance in compliance with the Subdivision Map Act, nothing more. Recognition of a legal parcel under the Subdivision Map Act is not a “subdivision”, to the contrary it is recognition of a legal unit of land which pre-existed adoption of the Act (adopted and made effective on March 1, 1975) and, for purposes of RDEIR evaluation, constitute a baseline condition. Issuance of a Certificate of Compliance in no way affects the zoning assigned to the recognized parcel or the permitted principal and conditional uses attendant to that zone classification. Any substantive change in the principal and conditionally permitted uses of the parcel requires a discretionary zoning reclassification and accompanying General Plan amendment.</p> <p>Furthermore, and of substantial significance, the conversion of timberland to a use other than growing timber requires, prior to conversion, a Timberland Conversion Permit approved by the California Department of Forestry and Fire Protection (“CAL FIRE”) or, if eligible, a Less Than 3 Acre Conversion Exemption (likely affecting only a portion of a parcel) accepted by CAL FIRE.</p> <p>The general commentary included in the RDEIR equating issuance of Certificates of Compliance and recognition of legal parcels/units of land under the Map Act with “timberland conversion” should be revised and/or removed as it does not accurately depict what a Certificate of Compliance is and the process does not directly result in the conversion of agricultural land or timberland. As discussed in greater detail below, these presumptions included in the RDEIR are not supported by substantial evidence or the studies cited in support of the conclusions.</p>
#2	3.2-11	<p>Beginning with the third paragraph on page 3.2-11, the RDEIR contains an incorrect statement that a Certificate of Compliance results in a change in “land use”. Again,</p>

		<p>changes in land use may only be achieved through either a General Plan Amendment and accompanying zoning change or through the General Plan Update process. The language regarding Certificates of Compliance should be removed as it does not accurately depict the circumstances under which a change in land use may occur. As the County is well aware, the Certificate of Compliance process on agricultural lands and timberlands routinely yields the identification of parcels containing substantial acreage volume, oftentimes in increments equal to the entirety of the original United States Patent. There is no basis to conclude the parcel recognition, in and of itself, constitutes a “conversion” of pre-existing land uses and the County has not identified substantial evidence to reach this conclusion.</p>
#3	3.2-11	<p>Beginning with the fourth paragraph on page 3.2-11, the RDEIR again makes a reference to conversion of agricultural lands and timberlands.</p> <p>The conversion of timberland to a use other than growing timber requires, prior to conversion, a Timberland Conversion Permit approved by CAL FIRE or, if eligible, a Less Than 3 Acre Conversion Exemption accepted by CAL FIRE.</p> <p>To the extent that the statement provided in the RDEIR relies upon the incorrect assumption that the Certificate of Compliance process results in conversion of agricultural lands and timberland it is not supported and should be revised or removed accordingly.</p>
#4	3.2-12	<p>The information and discussion appearing in the first paragraph regarding County parks and community parks appears to exclude the 1,000 acre (+/-) McKay Community Forest acquired by the County of Humboldt in August, 2014. If the Community Forest acreage is omitted, the County park acreage recited in the RDEIR does not represent current conditions and should be revised accordingly.</p>
#5	3.2-12	<p>Beginning with the third paragraph, the information provided regarding the County’s timber industry does not reflect current conditions. According to the California State Board of Equalization, between 2010 and 2015, the total value for Humboldt County’s timber harvest has fluctuated between approximately \$68 million and \$71 million, with a high of \$81 million in 2014. This information should be revised to represent current conditions. (Supporting information for these statistics is enclosed as Attachment D.)</p>
#6	3.2-14	<p>Under the topic “Timberland Conversion” appearing on page 3.2.-14, the commentary regarding the existence of multiple viewpoints of “timberland conversion” depending on how the terms is defined and in what context the term is used is unsubstantiated and misleading. The operative definition provided in the RDEIR and recognized in the timber industry for “Timberland Conversion” is that appearing in the California Forest Practices Act and implementing Regulations (California Code of Regulations Title 14, Article 7). This is the only definition that should be used in the context of discussing Timberland Conversion in the RDEIR or anywhere else in conjunction with the Humboldt County General Plan Update.</p> <p>The conversion of timberland to a use other than growing timber requires, prior to conversion, a Timberland Conversion Permit approved by CAL FIRE or, if eligible, a Less Than 3 Acre Conversion Exemption accepted by CAL FIRE.</p>

		<p>The information provided in the RDEIR should be revised to rely solely upon the definition of Timberland Conversion recognized by the Forest Practices Act and implementing Regulations and remove any discussion and/or reference to alternative definitions as absolutely none are provided in the RDEIR and this renders the document confusing, subjective and unsupported. The entire RDEIR should be evaluated to ensure the term "Timberland Conversion" is used only in the context recognized by applicable law, i.e., the conversion of timberland to non-timber growing use.</p>
#7	3.2-15	<p>As provided in the previous GDRCo comment, the discussion appearing in the first paragraph on page 3.2-15 describing "conversion" based on parcel size, market conditions or ownership values is speculative and should be removed. The general conclusion that "forest management practices are not enhanced with smaller parcel sizes" is vague, speculative and not supported by empirical evidence. No discussion appears in the RDEIR regarding what is considered a "small" timberland parcel. In fact, this is a major flaw in the RDEIR and the conclusions reached in the RDEIR are implicitly at odds with those reached by CAL FIRE as explained further in Comment #8, immediately below.</p> <p>The conversion of timberland to a use other than growing timber requires, prior to conversion, a Timberland Conversion Permit approved by CAL FIRE or, if eligible, a Less Than 3 Acre Conversion Exemption accepted by CAL FIRE.</p> <p>This chapter should be revised to remove any reference to "conversion" in the context of discussing land management priorities or economies of scale based on undefined "parcel sizes".</p>
#8	3.2-15	<p>It must be noted and the RDEIR corrected to reflect the fact that the first sentence of the second paragraph on page 3.2-15 has been restated and manipulated throughout the General Plan Update process beginning first with the Forest Resources Chapter of Natural Resources and Hazards Report prepared by Dyett & Bhatia (September 2002), then materially restated with the Forest Resources and Policies Report (October 2003 Draft, revised, April 2006) prepared by the Humboldt County Department of Community Development Services, and finally again as the text appears in this chapter of the RDEIR.</p> <p>Of note, the Natural Resources and Hazards Report prepared by Dyett & Bhatia (September 2002) first used the sentence in the following discussion regarding timberland conversion beginning on page 3-1 under Chapter 3; Forest Resources:</p> <p>TIMBERLAND CONVERSION</p> <p><i>Timberland conversion, the transfer of timberland to other uses, occurs as a result of General Plan amendments and new subdivisions, as well as through the Certificate of Compliance process, which involves recognition of historic parcels that may be substandard to minimum parcel sizes and densities established by the General Plan. One quarter of all the Certificate of Compliance applications submitted since 1985 have been on agricultural properties and timberlands, affecting more than 18,000 acres. Also, more than one half (53 percent) of all the lot line adjustment applications since 1985 have been</i></p>

on agricultural and timberlands, affecting more than 16,000 acres.

These changes are primarily reflective of the breakup of old family ranches. Timber production on these areas is likely still viable; therefore, these changes are not deeply significant with respect to the timber economy. Direct land use conversions by rezone out of TPZ (Timber Production Zone) have been more limited, on the order of 1,000 acres over the last 25 years, 910 acres of which were part of the County's Eureka Community Plan in 1995.

An additional conversion issue that has long been a topic of debate is conversion by public acquisition, highlighted most recently by the Headwaters Forest Reserve acquisition, which removed 7,500 acres from timber production. While such conversions maintain the open space values of the lands, they are lost to the economic sector.

Subsequently, the Forest Resources Chapter of the Natural Resources and Hazards Report prepared by the Department of Community Development Services incorrectly references Certificates of Compliance and Lot Line Adjustments as a means of "converting" timberland to other uses. The Department of Community Development Services reached this conclusion in direct contradiction to the finding by Dyett & Bhatia that "Timber production on these areas [i.e., parcels recognized under the Certificate of Compliance process] is likely still viable; therefore, these changes are not deeply significant with respect to the timber economy". (The operative sentence from the actual Dyett & Bhatia Report is highlighted in yellow above).

Of note, the Forest Resources and Policies (October 2003 Draft, revised, April 2006), subsequently prepared by the Humboldt County Department of Community Development Services, relied upon the Natural Resources and Hazards report prepared by Dyett & Bhatia. The Forest Resources and Policies report provided the following discussion regarding timberland conversion beginning on page 1-16 under Section 1.4; Conversion of Timberlands:

1.4 CONVERSION OF TIMBERLAND

Timberland conversion, the transfer of timberland to other uses, occurs as a result of General Plan amendments and new subdivisions, as well as through the Certificate of Compliance process, which involves recognition of historic parcels that may be substandard to minimum parcel sizes and densities established by the General Plan. One quarter of all the Certificate of Compliance applications submitted since 1985 have been on agricultural properties and timberlands, affecting more than 18,000 acres. Also, more than one half (53 percent) of all the lot line adjustment applications since 1985 have been on agricultural and timberlands, affecting more than 16,000 acres.

These changes are primarily reflective of the breakup of old family ranches. Timber production on these areas may still be viable; and it is unclear what specific effects this trend has had on the timber economy. However, forest management practices are generally not enhanced with smaller parcel sizes. Land ownership patterns, for example, are likely to become more complicated with smaller parcel sizes, which may inhibit resource production. Direct land use conversions by rezone out of TPZ (Timber Production

		<p>Zone) have been more limited, on the order of 1,000 acres over the last 25 years, 910 acres of which were part of the County's Eureka Community Plan in 1995.</p> <p>An additional conversion issue that has long been a topic of debate is conversion by public acquisition, highlighted most recently by the Headwaters Forest Reserve acquisition, which removed 7,500 acres from timber production. While such conversions maintain the open space values of the lands, they are lost to the economic sector.</p> <p>Finally, another process by which timberland conversion occurs is through the "Less than 3 acre Conversion Exemptions" which allow for the ministerial approval of conversion of less than 3 acres for other permitted land uses such as residential development.</p> <p>As the highlighted text makes clear, the Forest Resources and Policies Report incorrectly references Certificates of Compliance and Lot Line Adjustments as a means of converting timberland and materially misstates the findings of the Natural Resources and Hazards Report prepared by Dyett & Bhatia, 2002. The County's conclusion that changes in ownership by issuance of Certificates of Compliance "primarily reflective of the breakup of old family ranches" creates "unclear" effects on the timber economy contradicts the retained consultant's conclusion that any changes are not deeply significant.</p> <p>Finally the first sentence of the second chapter of the RDEIR at page 3.2-15 uses the same sentence in discussing timberland conversion in the context of changes in land management priorities. As stated in GDRCo comment #7, above, the use of the term conversion is misused in the context of discussing land management priorities and assumptions regarding parcel size, market conditions or ownership values are not supported and thus have not basis for inclusion in the RDEIR.</p> <p>Although GDRCo recognizes that there is no opportunity to revise any of the Background Reports used as part of the RDEIR, it does illustrate the importance of using the correct terminology in the correct context in a consistent manner throughout the process. Also, any discussion in the RDEIR should recite the actual conclusions of the retained consultants included in the supporting materials.</p>
#9	3.2-15	<p>The last paragraph on page 3.2-15 entitled "Conversion from Fragmentation" is entirely misleading, incorrect, and not substantiated by the material cited or the text in this section of the RDEIR. Moreover, the discussion materially omits the relevant discussion points and parcel size distinctions included in the cited CAL FIRE Fire and Resource Assessment Program's (FRAP) Forest and Range 2003 Assessment rendering the entire discussion in the RDEIR misleading and without proper context.</p> <p>Specifically, although the CAL FIRE Fire and Resource Assessment Program's (FRAP) Forest and Range 2003 Assessment, cited in the RDEIR, does include consideration of "fragmentation" and "parcelization" and the potential impacts that may consequently occur on agricultural and forest resources, the 2003 FRAP Assessment does not make a direct correlation between "parcelization" and "conversion" as does the title of this section. Of substantial import, although the RDEIR provides a definition of "parcelization", per the 2003 FRAP Forest and Range 2003 Resource Report at the foot of page 3.2-15 along with the FRAP definition of "rural residential" as being a housing</p>

density of one or more units per 20 acres and less than one unit per acre, the RDEIR completely ignores the Report's discussion regarding the decrease/lack of parcelization/fragmentation concerns associated with parcels 20 acres or greater.

The following is an excerpt from the 2003 FRAP Assessment includes the identification of a category above rural residential parcels (20 acres or less) which is described as working/private (20 acres or greater), and recites the decreased fragmentation or "conversion" concerns associated with this larger parcel classification:

Working/Private

Working/Private landscapes are those lands in private ownership with sparse housing density (less than one unit per 20 acres). They are used for a variety of purposes with commodity production often as the primary focus. These areas, where the role of private investment for production of energy, lumber, and livestock is coupled with supportive policy tools can potentially play the biggest role in maintaining lands in an unfragmented condition. In addition, these areas still provide for habitat restoration or management, recreation, and dispersed living space. These areas provide significant traditional ecosystem services as complements to the primary revenue producing management goals.

As the 2003 FRAP Forest and Range 2003 Resource Report clearly indicates, parcels with a housing density of one unit per 20 acres or greater **do not** constitute or result in fragmentation, and, to the contrary, may play an important role in maintaining lands in an unfragmented condition and "provide significant traditional ecosystem services as complements to the primary revenue producing management goals", as the Report concludes.

It should be noted that a subsequent FRAP Forest and Range Assessment was completed in 2010, and a FRAP Forest and Resource Assessment for 2015 is in the process of being completed. The FRAP 2010 Forest and Range Assessment provides updated definitions for parcelization and fragmentation:

Parcelization: *The process of land ownership being broken into increasingly smaller tracts; by definition in the Assessment, housing density of one or more units per 20 acres and less than one unit per acre.*

Fragmentation: *The process by which a contiguous land cover, vegetative community, or habitat is broken into smaller patches within a mosaic of other forms of land use/land cover, e.g., islands of an older forest age class immersed within areas of younger aged forest (Helms, 1998), or patches of oak woodlands surrounded by housing development.*

Based upon these more recent FRAP definitions, GDRCo respectfully recommends deletion of the terms "Conversion and Fragmentation" from the title of this section in the RDEIR and, instead, all pertinent text included in the FRAP Assessment Reports (original and updated) be included in the RDEIR. A "parcelization" discussion may be appropriate in the RDEIR or the General Plan Update document provided a definition for the term is included and used consistently throughout the document. The 20 acre standard and "Parcelization" and "Fragmentation" definitions included and analyzed in the 2010 FRAP

		<p>Assessment appears to provide an appropriate definition.</p> <p>Again, it must be noted that, based on historic experience factors, the Certificate of Compliance process in Humboldt County routinely yields the identification of parcels substantially greater in size than 20 acres.</p>
#10	3.2-16	<p>In the second paragraph of page 3.2-16 as part of its “parcelization” discussion the RDEIR references a study prepared by the North Coast Regional Land Trust (NRLT). However, the NRLT study does not utilize the term “parcelization” anywhere in the report. The NRLT report does use the term “subdivision” which is much more narrowly defined. However, the NRLT report fails to provide any data to substantiate that approximately 35,000 acres of forestland was subdivided in Humboldt County, as defined by the Subdivision Map Act. If, in fact, the approximate 35,000 acres simply changed hands as a result of a change in ownership, the report is overreaching and materially misleading in referring to the 35,000 acres as being subdivided.</p> <p>Furthermore, both the RDEIR and the NRLT report failed to consider the economic effects of variations in log prices and market demand which play a critical role in a landowner’s decision to harvest timber.</p> <p>Any discussion regarding the NRLT report in the RDEIR should be limited to terminology and/or the data utilized in the NRLT report. If in fact the approximate 35,000 acres referenced in the NRLT as being subdivided actually represents a change in ownership, the RDEIR should not rely on the NRLT report and any assumptions in the report regarding decreased timber harvest on these lands should be reconciled with market influences during the limited time period considered in the report.</p>
#11	3.2-16	<p>The first sentence, third paragraph of page 3.2-16 misrepresents what a patent parcel is and incorrectly states that the existence of patent parcels affects “fragmentation” of land. The balance of the paragraph more accurately explains what a patent parcel is and the process by which it can be determined whether a patent parcel, or any parcel, is considered a separate legal parcel.</p> <p>Legal parcels, whether they are unaltered patent parcels or parcels created in conformance with the Subdivision Map Act, are the means by which property is held (owned). GDRCo does support retaining the rights of property ownership to the extent they exist. Any “fragmentation” of the forest resource land base in Humboldt County occurs as a result of external factors (economic, social, or other), not based upon the existence of patent parcels the vast majority of which substantially exceed 20 acres in size—which generally results in no fragmentation as concluded in the CAL FIRE 2003 FRAP Forest and Range 2003 Resource Report.</p> <p>The first sentence of the paragraph should be removed from the RDEIR as it misrepresents what a patent parcel is and incorrectly states that the existence of patent parcels creates fragmentation of land.</p>
#12	3.2-17	<p>In the second paragraph, first two sentences on page 3.2-17 the RDEIR fails to explain that the change in ownership pattern for industrial timberland owners during the period from</p>

		<p>2001 to 2008 was largely a result of companies closing sawmills due to a lack of timber supply from the US Forest Service. Many of these companies were heavily reliant upon timber from the US Forest Service and when sawmills closed all assets were typically liquidated, including timberland holdings.</p> <p>This information should be revised to further explain or substantiate the change in timberland ownership during this time period.</p>
#13	3.2-17	<p>In the second paragraph, last sentence on page 3.2-17, a misleading statement appears regarding the recognition of patent or legal parcels. The recognition of patent or legal parcels (i.e. Certificates of Compliance) does not in and of itself serve as a legal mechanism to break up large ranches and timberland and has no impact on the permitted and/or conditionally permitted uses of land based on zoning classifications.</p> <p>A Certificate of Compliance relates only to issues of compliance or noncompliance with the Subdivision Map Act and local ordinances enacted pursuant thereto. A Certificate of Compliance does not certify that the real property for which the certificate has been issued is suitable for development in accordance with existing or future regulations nor does issuance of a Certificate of Compliance in any way permit uses of land not allowed by its zoning classification. Certificates of Compliance can be used to assist in valuing conservation easements, for financing purposes, or for matters pertaining to title and any restraint on their issuance violates the Subdivision Map Act and creates an unlawful restriction on the alienation of land.</p> <p>This information should be revised to state that landowners may elect to sell individual patents or legal parcels upon receipt of a Certificate of Compliance.</p>
#14	3.2-17	<p>Beginning with the fourth paragraph and continuing through the third paragraph on page 3.2-18, the discussion of a previous proposal by MAXXAM Corporation is outdated and irrelevant as it was never a project, never came to fruition and any land use planning based on this artifact is unsupported and entirely speculative. The discussion regarding other land sales and any reference to illegal activities by the sellers or purchasers of property is irrelevant as these are issues related to enforcement and not the current Framework Plan or the proposed General Plan Update.</p>
#15	3.2-18	<p>The fourth paragraph on page 3.2-18 contains a false narrative perpetuated throughout Section 3.2 that an individual timberland patent or legal parcel, when sold, is converted and no longer suitable for timber production. While it is acknowledged that there is an economy of scale related to the size of timberland holdings, and the corresponding management of same, the conveyance of an individual patent or legal parcel does not constitute conversion (as defined by CAL FIRE) nor does it constitute detrimental fragmentation, per se, as evaluated by the 2003 FRAP Forest and Range 2003 Resource Report referenced above. Therefore, the timber producing capabilities of timberlands are not necessarily lost as a result of the sale of an individual patent or legal parcel and the RDEIR discussion on this point is entirely speculative and unsupported.</p> <p>The conversion of timberland to a use other than growing timber requires, prior to conversion, a Timberland Conversion Permit approved by CAL FIRE or, if eligible, a Less</p>

		<p>Than 3 Acre Conversion Exemption accepted by CAL FIRE.</p> <p>It is important to note that GDRCo's ownership in Humboldt County represents hundreds of real estate transactions, both purchases and sales, beginning in approximately 1956. In other words, the GDRCo ownership did not always look as it does today. When acquired these lands had economic value not only as timberland but also as individual parcels. It is of importance to GDRCo that economic value is maintained for resource lands, especially to the extent that these lands had a certain economic value when acquired.</p> <p>If the County intends to accurately assess if resource lands are adequately protected, there must first be a comprehensive revision of Section 3.2 to more narrowly define what constitutes conversion of timberland, and what constitutes "fragmentation" or "parcelization" with detrimental effects on timber resources and ecology. Again, the 2003 FRAP Forest and Range 2003 Resource Report acknowledges 20 acre parcels as a defining mechanism, recognizing continued timber productivity and ecological benefits of parcels 20 acres or greater. The false narrative that Certificates of Compliance, Determinations of Status, and even the sale of individual patents or legal parcels constitute "conversion" of timberland with detrimental environmental effects should be removed from the discussion of timberland resources in Section 3.2. The discussion is not defined, has no definitional reference points, and is thus vague and in violation of EIR requirements under CEQA. (See Attachment B appended hereto).</p>
#16	3.2-19	<p>The first paragraph of page 3.2-19 states that the General Plan Update (i.e. the Project) "...could include new policies which could facilitate conversion of farmland or forest land" is extremely speculative and unsupported. In the context of assessing Impacts and Mitigation Measures, only those policies which are included as part of the General Plan Update as presented in this RDEIR can be considered and/or evaluated. This language should be deleted from the RDEIR.</p>
#17	3.2-19	<p>The fourth paragraph, last sentence of page 3.2-19 is misleading in that conversion of timberland does not directly result from the subdivision or the sale of individual patents or legal parcels.</p> <p>The subdivision of TPZ zoned lands is allowed down to a 40-acre minimum parcel size with an approved JTMP. The intent of a JTMP is to ensure that timber management is still viable subsequent to a subdivision being approved. The County should recognize that the conversion of timberland to a use other than growing timber requires, prior to conversion, a Timberland Conversion Permit approved by CAL FIRE or, if eligible, a Less Than 3 Acre Conversion Exemption accepted by CAL FIRE.</p> <p>Again, the sale of an individual patent or legal parcels does not in and of itself constitute conversion of timberland. As previously stated, the term Timberland Conversion should be limited to that which is provided in the Forest Practice Act (Title 14, Article 7).</p> <p>This sentence should be removed from the RDEIR.</p>
#18	3.2-32	<p>Under the heading "Trinidad Planning Watershed, Changes from T" on page 3.2-32, the 42 acres referenced as being east of Big Lagoon is believed to be GDRCo property for</p>

		<p>which GDRCo submitted a change in land use designation. GDRCo had initially made a request to have the land use designation changed from T to RE so that the land use would conform with what was an existing residential use. GDRCo no longer provides residential use of this approximately 42 acre property and subsequently requested that the land use be changed from T to CR, which was approved by the Board of Supervisors and is reflected in the current land use maps.</p> <p>Information provided under the Trinidad Planning Watershed, Changes from T should be revised to describe the change in land use for the approximately 42 acre property located east of Big Lagoon as changing from T to CR.</p>
#19	3.2-34	<p>The last paragraph of page 3.2-34 contains the title “Conversion as a result of increased parcelization and subsequent development” which is materially misleading and unsubstantiated by the subsequent content.</p> <p>As previously stated, selling individual patents or legal parcels does not constitute conversion, nor does it constitute a change in parcel size. Patents and/or legal parcels can form the basis in which real property interests are held, with larger ownerships being comprised of multiple patents and/or legal parcels. While such properties may change ownership they are still available for resource production and it is up to the individual landowner and applicable zoning regulations as to how those resources are used and managed.</p> <p>The conversion of timberland to a use other than growing timber requires, prior to conversion, a Timberland Conversion Permit approved by CAL FIRE or, if eligible, a Less Than 3 Acre Conversion Exemption accepted by CAL FIRE.</p> <p>The term “conversion” should be removed from the subsection title—the RDEIR wholly fails to provide any definition to what constitutes actual “fragmentation” or what sized parcels cause these concerns and general commentary of this nature is not appropriate in an EIR.</p>
#20	3.2-35	<p>In the first paragraph on page 3.2-35 regarding the density standard for patents and legal parcels it should be recognized that one dwelling unit per parcel is allowed regardless of whether the acreage meets the minimum parcel size (i.e. 160 acres for TPZ).</p> <p>Patents were originally established based upon the Public Land Survey System (PLSS) resulting in patents averaging approximately 160 acres +/- in size, upwards to 640 acres. The fact that a patent parcel is less than 160 acres should not be a basis for nonconformance. Furthermore, the Subdivision Map Act provides a process to recognize existing legal parcels with the understanding that said recognition does not constitute subdivision.</p> <p>Patents and/or legal parcels can form the basis in which real property interest are held, with larger ownerships being comprised of multiple patents and/or legal parcels. Selling individual patents or legal parcels does not constitute subdivision, nor does it violate the Subdivision Map Act. It is misleading for the County to insinuate that the compliance with the Subdivision Map Act is somehow being avoided through the recognition, sale or</p>

		<p>purchase of patents and/or legal parcels.</p> <p>This paragraph should be removed.</p>
#21	3.2-35	<p>The discussion in the second paragraph on page 3.2-35 regarding patent parcels is both speculative and subjective. The Determination of Status process, as provided for by the Subdivision Map Act, is the only accurate means of establishing the number unaltered and altered patent parcels and defining base units of land. The last sentence in this paragraph should be revised to specify that any unaltered or altered patent parcel found to be in conformance with the Subdivision Map Act Determination of Status process would retain its historic rights. Any other assumption is contrary to law.</p>
#22	3.2-35	<p>The discussion in the third paragraph on page 3.2-35 comingles the Determination of Status process (i.e. Certificates of Compliance) and development criteria which are not mutually exclusive.</p> <p>A Certificate of Compliance relates only to issues of compliance or noncompliance with the Subdivision Map Act and local ordinances enacted pursuant thereto. A Certificate of Compliance does not certify that the real property for which the certificate has been issued is suitable for development in accordance with existing or future regulations.</p> <p>The information provided in this paragraph should be revised to clearly state that the Determination of Status process is not contingent upon development criteria.</p>
#23	3.2-35	<p>The first paragraph under “Other changes that could result in Conversion of Farmland or Forestland” on page 3.2-35 and discussion regarding conversion as used in the subsection title should be limited to the definition of Timberland Conversion as provided in the Forest Practice Act (Title 14, Article 7).</p>
#24	3.2-36	<p>The third paragraph, first sentence of page 3.2-36 contains a general statement without sufficient facts to support the conclusion. Conflicts may occur however it must be recognized that timber harvesting is a relatively short-lived event with short term disruptions as compared to ongoing timber management activities and, as the 2003 FRAP Forest and Range 2003 Resource Report and updates clearly recognize, any “conflicts” greatly diminish on parcels in excess of 20 acres in size. Again the use of the term conversion should be limited to the definition of Timberland Conversion as provided in the Forest Practice Act (Title 14, Article 7).</p>
#25	3.2-36	<p>The third paragraph, third sentence of page 3.2-36 should be changed as follows: the term “limiting incompatible uses” should be further clarified to state “limiting incompatible uses consistent with Government Code 51100-51104”.</p>
#26	3.2-39	<p>The sixth paragraph, first sentence on page 3.2-39, regarding the use of the term “parcelization”, is again misleading. Neither the RDEIR nor the Board of Supervisors’ approved draft General Plan Update provides any definition for “parcelization”. If the term, as used in the first sentence of the sixth paragraph on page 3.2-39 of the RDEIR assumes that a Certificate of Compliance constitutes parcelization, then this is a false and</p>

		<p>misleading statement and should be revised accordingly. Likewise, every conveyance of land constitutes a “parcelization” to some extent—the purpose of the EIR is analyze detrimental environmental effects, without evaluating parcel size relative to any discussion of “parcelization” and/or “fragmentation” renders the entire narrative vague and unsupported.</p>
#27	3.2-39	<p>In the sixth paragraph, starting with the third sentence on page 3.2-39 and continuing onto page 3.2-40, the discussion assumes that the non-implementation of the Merger Ordinance will cause the “conversion” or “loss” of timberlands to rural residential uses. This assumption is entirely unsupported and the narrative in the RDEIR lacks context. Again, the 2003 FRAP Forest and Range 2003 Resource Report does provide context in this regard (i.e., recognizing density at less than 20 acres to cause fragmentation concerns), but the RDEIR makes no effort to define “parcelization” or “fragmentation” in a meaningful, substantive manner. The narrative is vague, unsupported and should be stricken.</p> <p>As previously stated, selling individual patents or legal parcels does not constitute conversion, nor does it constitute a change in parcel size. Patents and/or legal parcels can form the basis in which real property interest are held, with larger ownerships being comprised of multiple patents and/or legal parcels. While such properties may change ownership they are still available for resource production and it is up to the individual landowner as to how those resources are managed.</p> <p>The conversion of timberland to a use other than growing timber requires, prior to conversion, a Timberland Conversion Permit approved by CAL FIRE or, if eligible, a Less Than 3 Acre Conversion Exemption accepted by CAL FIRE.</p> <p>The fourth sentence of the sixth paragraph on page 3.2-39 should be deleted as it is not adequately substantiated.</p>
#28	3.2-40	<p>The first paragraph on page 3.2-40 contains information that is misleading because the term “conversion” infers that the timber growing capacity of resource production lands is lost if used in conjunction with rural residential purposes. This gross generalization gives no consideration to parcel size and fails to recognize that these parcels likely retain the land use and zoning that support resource production and can provide ecological benefits as well, as expressly concluded in the 2003 FRAP Forest and Range 2003 Resource Report for parcels 20 acres or greater.</p> <p>As previously stated, selling individual patents or legal parcels does not constitute conversion, nor does it constitute a change in parcel size. Patents and/or legal parcels can form the basis in which real property interests are held, with larger ownerships being comprised of multiple patents and/or legal parcels. While such properties may change ownership they are still available for resource production and it is up to the individual landowner as to how those resources are managed.</p> <p>The conversion of timberland to a use other than growing timber requires, prior to conversion, a Timberland Conversion Permit approved by CAL FIRE or, if eligible, a Less Than 3 Acre Conversion Exemption accepted by CAL FIRE.</p>

		<p>The finding provided here that there is a significant unavoidable impact is unsubstantiated and inaccurate if the County presumes (as the RDEIR text implies) that “conversion” occurs as a result of either the sale of individual patents/legal parcels or the residential use of timber resource lands. This implicit finding relies upon a false narrative without any context and should be re-evaluated by limiting the use of the term “conversion” in a manner that is consistent with the Forest Practice Act.</p>
#29	3.2-40	<p>Fourth paragraph, first sentence; T as used at the end of this sentence should be revised to be TPZ.</p>
#30	3.3-55	<p>Mitigation 3.3.3.2.a.; It should be recognized that the mitigation proposed is an onerous undertaking and it is likely unrealistic that such an evaluation could be completed within a two-year timeframe. The County, under current State regulations, is required to evaluate critical watersheds.</p> <p>If Mitigation 3.3.3.2.a. is adopted the sole cost of completing said evaluation should be the responsibility of the County, not individual project applicants, and any failure on the part of the County to complete the evaluation within the specified two-year timeframe should not result in a de facto moratorium on development or any other project in a given watershed.</p>
#31	3.11-17	<p>Impact 3.11.3.5. Habitat Conservation Plans; suggest the first sentence under this subchapter be revised as follows:</p> <p><i>“Implementation of the General Plan Update could result in additional development that conflicts with adopted habitat conservation plans”.</i></p> <p>This suggested change is relevant considering that an HCP may provide for limited land use changes and therefore be an absolute conflict.</p>
#32	3.11-18	<p>First paragraph, beginning with the fourth sentence; the information provided in the RDEIR herein is misleading and hyperbolic.</p> <p>As stated in Chapter 2 of the RDEIR, “The RDEIR is focused on the environmental effects which may reasonably be expected to occur during the 24-year planning period of the GPU, 2016-2024, as described in subchapters 2.1 and 2.5 below”. Table 2.5-1 on page 2-24 of the RDEIR provides the estimated number of dwelling units by land use designation that will be required to accommodate the estimated maximum feasible housing development and potential and projected development from 2016 to 2040. For lands planned T or TC the estimate provided is 44 housing units assuming that peak demand occurs in 2028. The discussion provided on page 3.11-17, under “Analysis of Relevant General Plan Update Policies”, should be limited to the scope of the Project as described in the RDEIR. The discussion which refers to the theoretical construction of as many as “20,000 dwelling units” on lands planned Timberlands (T) is completely hyperbolic and irrelevant as the analysis of relevant General Plan Update policies related to land planned T. Specifically, in order to maintain internal consistency, the number of dwelling units on lands zoned T considered in the RDEIR should be limited to the estimated 44 units as</p>

		<p>identified in the RDEIR. The “20,000” unit assumption is entirely misplaced and without support. Furthermore, the presumption, as framed, violates accepted EIR scoping and project description standards under CEQA. (See legal opinion appended as Attachment B).</p> <p>The discussion provided under Analysis of Relevant General Plan Update Policies regarding the planned densities and theoretical maximum buildout of lands planned T to “20,000 units” should be removed as it is outside the scope of the Project as described in the RDEIR and it is not substantiated by any analysis elsewhere in the RDEIR.</p>
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Attachment B

Legal Opinion

MITCHELL, BRISSO, DELANEY & VRIEZE, LLP

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June 29, 2017

Craig Compton
Manager, Land Management & Business Development
Green Diamond Resource Company
P.O. Box 1089
Arcata, CA 95518

Re: Humboldt County General Plan Update Revised Environmental Impact
Report (dated April 19, 2017)

Dear Mr. Compton:

You requested that our law office review pertinent portions of the Humboldt County General Plan Update Revised Draft Environmental Impact Report (dated April 19, 2017) (the "RDEIR") prepared in accord with the California Environmental Quality Act ("CEQA") and provide a legal analysis and response to the following questions:

1. Does issuance of a Certificate of Compliance under the California Subdivision Map Act (California Government Code § 66410, et seq.) on real property parcels zoned for timber production ("TPZ"), timberland ("T"), or any form of agriculture (principally agriculture (AG) and/or agriculture exclusive (AE)) enable or entitle the owner of real property to "convert" the use(s) made of the property to something other than uses principally or conditionally permitted by the parcel's zoning classification?
2. Do the general references and discussion points contained in the RDEIR related to the "conversion", "parcelization" and/or "fragmentation" of timberlands and agricultural lands in the Agricultural and Timber Resources Chapter (Chapter 3.2) and elsewhere in the RDEIR satisfy requirements applicable to Environmental Impact Report preparation under the California Environmental Quality Act?

Each of these questions is answered, in turn, as follows:

1. Certificate of Compliance Issuance Does Not Constitute Timberland Conversion

The RDEIR repeatedly and erroneously equates the issuance of Certificates of Compliance under the California Subdivision Map Act (Calif. Government Code § 66410, et seq.) as a form of timberland or agricultural land “conversion.” Specifically, the discussion commences at page 3.2-11 of the RDEIR as follows: “[i]n addition to conversion occurring because of General Plan amendments and new subdivisions, resource lands may be converted through the Certificate of Compliance process, which involves recognition of historic parcels that may be substandard to minimum parcel sizes and densities established by the General Plan.”

This “presumption” is not supported by substantial evidence, and it is contrary to established law. The issuance of a Certificate of Compliance does not, by itself, affect land use designations, zoning designations, or parcel size. (*See* Gov. Code, § 66499.35 [Certificates of Compliance “relate[] *only to issues of compliance or noncompliance with the Subdivision Map Act and local ordinances enacted pursuant thereto.* The parcel described herein may be sold, leased, or financed without further compliance with the Subdivision Map Act or any local ordinance enacted pursuant thereto. *Development of the parcel may require issuance of a permit or permits, or other grant or grants of approval.*” (Emphasis added)].) The effect of a certificate is *limited* to legitimizing divisions of property that have *already occurred.* (*Save Mount Diablo v. Contra Costa County* (2015) 240 Cal.App.4th 1368, 1389, review denied (Jan. 20, 2016).)

Timberland conversion is an established, technical term. As the RDEIR appropriately recites, the recognized definition of the term “Timberland Conversion” appears in the California Forest Practices Act (“FPA”) and implementing regulations. (*See* RDEIR at p. 3.2-14, *citing* Calif. Code of Regulations (“CCR”) Title 14, Article 7.) In pertinent part, “Timberland Conversion” is defined as follows:

- (g) "Timberland Conversion":
 - (1) Within non-Timberland Production Zone (TPZ) timberland, transforming timberland to a non-timber growing use through timber operations where:
 - (A) Future timber harvests will be prevented or infeasible because of land occupancy and activities thereon; or

- (B) Stocking requirements of the applicable district forest practice rules will not be met within five years after completion of timber operations; or
 - (C) There is a clear intent to divide timberland into ownerships of less than three acres (1.214 ha.).
- (2) Within TPZ lands, the immediate rezoning of TPZ lands, whether timber operations are involved or not except as exempt from a timberland conversion permit under 14 CCR 1104.1.

(14 CCR § 1100(g).)

Timberland conversion is *only* accomplished by way of a Timberland Conversion Permit or, if eligible, a Less Than 3 Acre Conversion Exemption, each of which the California Department of Forestry (“CAL FIRE”) has jurisdiction. (*See* Calif. Code of Regulations Title 14, Article 7.) The RDEIR seems to acknowledge this fact by correctly noting that the “Forest Practices Act ... provides a legal definition of ‘timberland conversion’” and that such conversions are only accomplished through the issuance of permits or exemptions. (RDEIR pg. 3.2-14.) Nevertheless, the RDEIR then confuses the concept by assuming “another type of ‘conversion’ that is more difficult to define and track is the change in land management priorities based upon parcel size, market conditions and ownership values.” (RDEIR pg 3.2-15.) The RDEIR then proceeds with a lengthy narrative about assumed “conversion” caused by “[f]ragmentation and ‘parcelization’” of timberlands and further equates “conversion” with Certificate of Compliance and/or Conditional Certificate of Compliance issuance under the Subdivision Map Act. (RDEIR, pgs. 3.2-15-3.2-16.)

Despite the general commentary in the RDEIR, nothing about Certificate of Compliance issuance, Lot Line Adjustments or other non-divisional parcel adjustments “converts” any existing uses of land or create an entitlement to additional uses of land. The false narrative that Certificates of Compliance, Determinations of Status, and even the sale of individual patents or legal parcels constitute “conversion” of timberland or agricultural lands with detrimental environmental effects should be removed from the discussion of agricultural and timber resources in Chapter 3.2 of the RDEIR. There is no basis in law to equate Certificates of Compliance or legal parcel recognition as a form of timberland and/or agricultural land “conversion”. Moreover, as discussed immediately below, the assumption that “conversion” occurs as a result of the Certificate of

Compliance process is not supported by substantial evidence and is thus an improper consideration in the RDEIR.

2. **The RDEIR Discussion Regarding “Fragmentation” and “Parcelization” of Timberland Is Vague, Undefined and Not Supported by Substantial Evidence as Required by CEQA.**

It is well established that the findings in an Environmental Impact Report must be supported by “substantial evidence.” (Cal. Code Regs., tit. 14, § 15384.) “Substantial evidence” means “enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached.” (*Id.*) “Substantial evidence” does not include “argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate.” (*Id.*; see also Pub. Resources Code, § 21080(e)(2) and *Sierra Club v. California Dept. of Forestry and Fire Protection* (2007) 150 Cal.App.4th 370, 381.)

Of consequence, the RDEIR contains a protracted discussion about alleged “fragmentation” and “parcelization” of timberlands and agricultural lands and presumed adverse environmental consequences associated with these potential practices. (RDEIR at pgs. 3.2-15 through 3.2-18.) Rendering the discussion entirely vague and without context, the RDEIR makes no attempt to independently define the terms “fragmentation” or “parcelization”. Further complicating the confusion, in support of the discussion about “parcelization” the RDEIR cites the 2003 CAL FIRE and Resource Assessment Program’s (FRAP) Forest and Range 2003 Assessment. (RDEIR at p. 3.2-15, fn. 1.) The RDEIR’s reference to the 2003 Assessment is entirely misleading and without proper context, however, because the RDEIR materially omits the relevant discussion points and parcel size distinctions included in the 2003 Assessment.

Specifically, although the FRAP Forest and Range 2003 Assessment does include consideration of “fragmentation” and “parcelization” and the potential impacts that may consequently occur on agricultural and forest resources, nothing in the Assessment establishes any correlation to the history of the Certificate of Compliance process in Humboldt County recited in the RDEIR. Rather than provide support, the FRAP Forest and Range Assessment actually contradicts any such conclusion. Without justification, the RDEIR completely omits the discussion appearing in the FRAP Forest and Range 2003 Assessment regarding the *decrease/lack* of parcelization/fragmentation concerns associated with timberland and resource parcels 20 acres or greater. The following is an

excerpt from the 2003 FRAP Assessment which includes the identification of a category above “rural residential parcels (sized 20 acres or less)” which is described as “working/private parcels (sized 20 acres or greater)”, and recites the decreased fragmentation or “conversion” concerns associated with this larger parcel classification:

Working/Private

Working/Private landscapes are those lands in private ownership with sparse housing density (less than one unit per 20 acres). They are used for a variety of purposes with commodity production often as the primary focus. These areas, where the role of private investment for production of energy, lumber, and livestock is coupled with supportive policy tools can potentially play the biggest role in maintaining lands in an unfragmented condition. In addition, these areas still provide for habitat restoration or management, recreation, and dispersed living space. These areas provide significant traditional ecosystem services as complements to the primary revenue producing management goals.

As the 2003 FRAP Forest and Range Assessment clearly indicates, parcels with a housing density of one unit per 20 acres or greater **do not** constitute “fragmentation”, and, to the contrary, may play an important role in maintaining lands in an unfragmented condition and “provide significant traditional ecosystem services as complements to the primary revenue producing management goals”, as the Assessment concludes.

It should be noted that a subsequent FRAP Forest and Range Assessment was completed in 2010, and a FRAP Forest and Resource Assessment for 2015 is in the process of being completed. The FRAP 2010 Forest and Range Assessment provides updated definitions for both “parcelization” and “fragmentation” as follows:

Parcelization: *The process of land ownership being broken into increasingly smaller tracts; by definition in the Assessment, housing density of one or more units per 20 acres and less than one unit per acre.*

Fragmentation: *The process by which a contiguous land cover, vegetative community, or habitat is broken into smaller patches within a mosaic of other forms of land use/land cover, e.g., islands of an older forest age class immersed within areas of younger aged forest (Helms, 1998), or patches of oak woodlands surrounded by housing development.*

If any discussion is to be included in the EIR about “fragmentation” and/or “parcelization” of timberlands and agricultural lands, the conclusions about *decreased* fragmentation concerns on parcels sized 20 acres contained in the FRAP 2003 Assessment and 2010 update should be incorporated. All pertinent text included in the FRAP Assessment Reports (original and updated) should be included in the RDEIR. A “parcelization” discussion may be appropriate in the General Plan Update EIR provided a definition for the term is included and used consistently throughout the document. The 20 acre standard for “parcelization” and “fragmentation” definitions included and analyzed in the 2010 FRAP Assessment appears to provide an appropriate definition/reference.

Additionally, as Humboldt County’s experience factor with the Certificate of Compliance process demonstrates, it is rare that the process yields the identification of parcels of land measuring less than 20 acres in size on parcels zoned T or TPZ.

In summary, the discussion regarding “fragmentation” and/or “parcelization” appearing at pages 3.2-15 through 3.2-18 of the RDEIR is vague, misleading, materially misquotes and ignores pertinent discussion points in the “evidence” cited (principally the CAL FIRE FRAP Assessments) and, as a whole, materially lacks “substantial evidence” to support the discussion about adverse environmental impacts associated with the Certificate of Compliance process and/or the sale and conveyance of patent parcels. As such, the discussion violates California Code of Regulations Title 14, § 15384, and should be deleted from the RDEIR.

As we have discussed, you indicated that GDRCo intends to submit this correspondence along with, and in support of, comments GDRCo is offering to the RDEIR. We acknowledge your right and authorization to do so.

Very truly yours,

MITCHELL, BRISSO, DELANEY & VRIEZE, LLP



Russell S. Gans

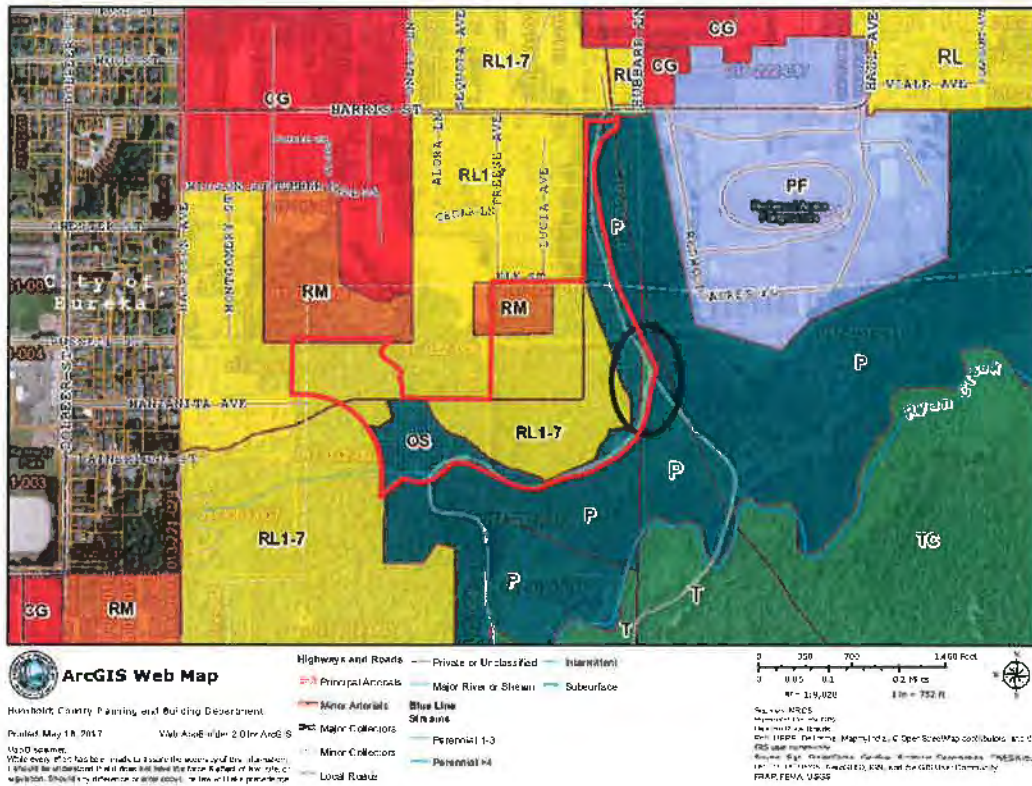
RSG/jg

Attachment C

Land Use Request/Comments						
Appendix F: Map Book	Parcel	Name	Request	Attachment #	Land Use Designation	
					Appendix F: Map Book	Humboldt Web GIS
Eureka	017-032-014	Green Diamond Resource Company	Remove "T" portion in Web Map; change to OS	1	RL1-7, RM, OS	RL1-7, RM, OS, T
Eureka	303-012-005	Green Diamond Resource Company	Change RA5-20 to OS; Change OS (#2 on Attachment 4) to T	2	RL1-7,RAS-20, OS, T	RL1-7,RAS-20, OS, T
Indianola/Myrtle town	017-081-001	California Redwood Company	Change from IG to MG; within Coastal Zone	3	IG	IG
Indianola/Myrtle town	404-141-004	California Redwood Company	Remove NR and change to MG	4	MG;NR	MG;NR
Scotia/Rio Dell	205-031-047	Green Diamond Resource Company	Change from RAS-20 to RAS-20/UR	5	RAS-20	RAS-20
Central	311-171-007	Green Diamond Resource Company	Change from T to IR	6	no good view	T
Big Lagoon/Patricks Point	517-142-014	Green Diamond Resource Company	Change from RE1-5 to CR	7	RE1-5	RE1-5
Northern Humboldt	518-053-006	Green Diamond Resource Company	Change portion that is P to T	8	T, P	T, P

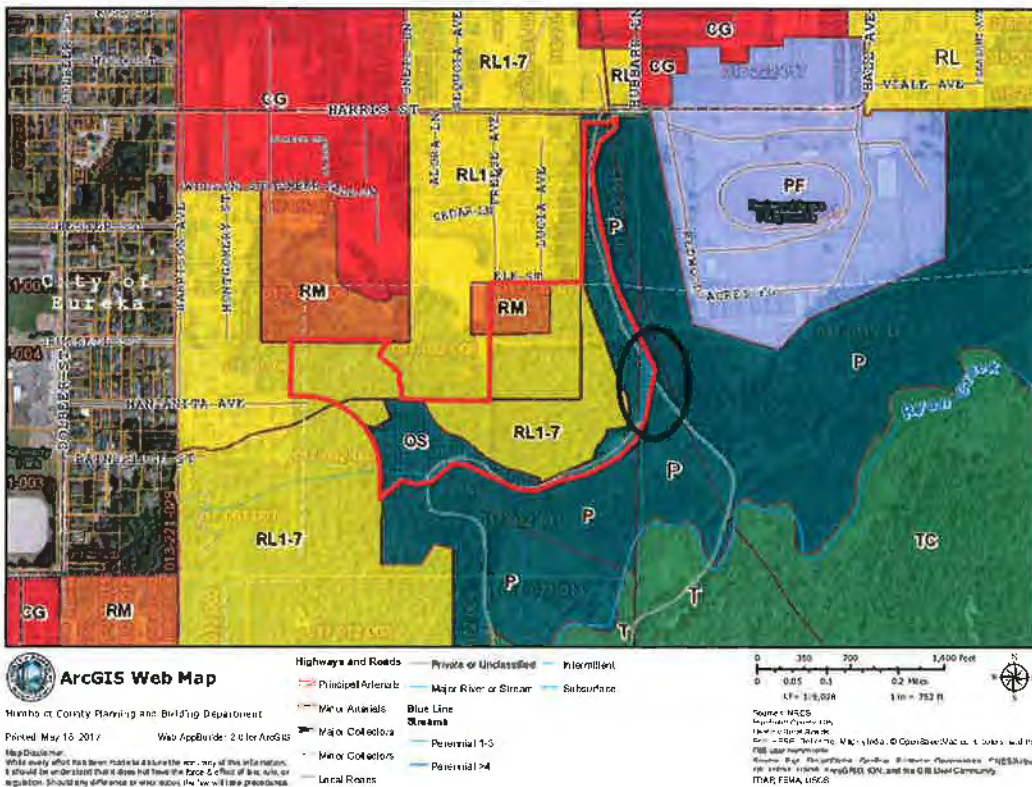
Attachment # 1
 Parcel 017-032-014

County
Land Use
Map



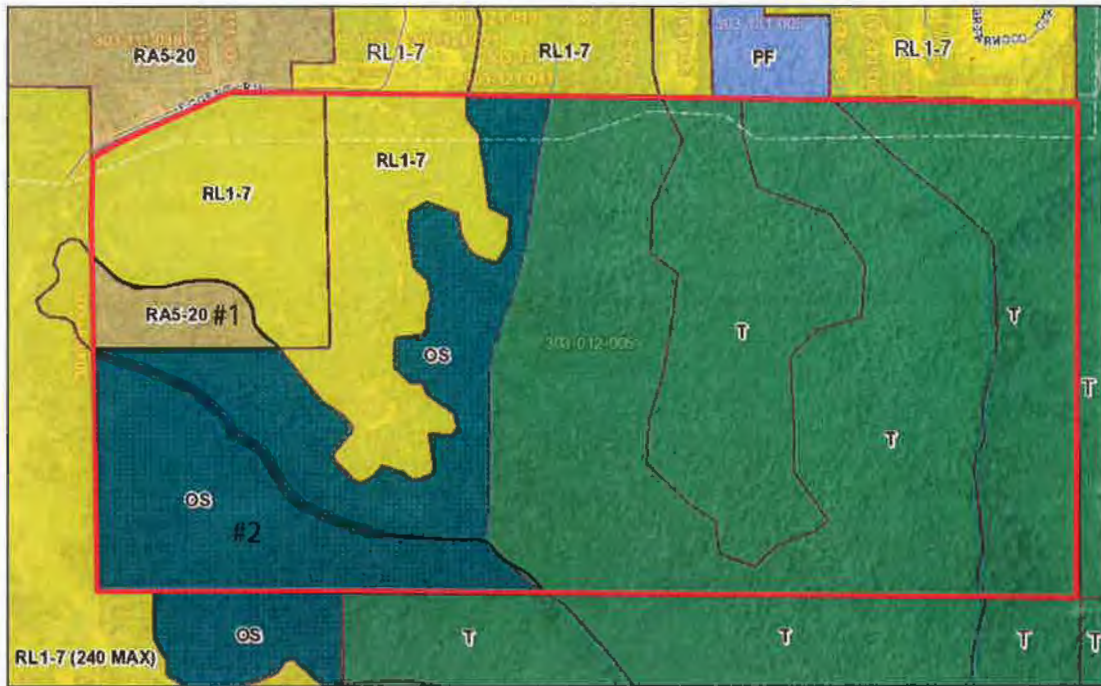
Comment: Change T portion to OS

Board of
Supervisors
Approved
Land Use



Attachment # 2
 Parcel 303-012-005

County
Land Use
Map



ArcGIS Web Map
 Humboldt County Planning and Building Department
 Printed: May 12, 2017 Web App: ArcGIS 2.0 for ArcGIS

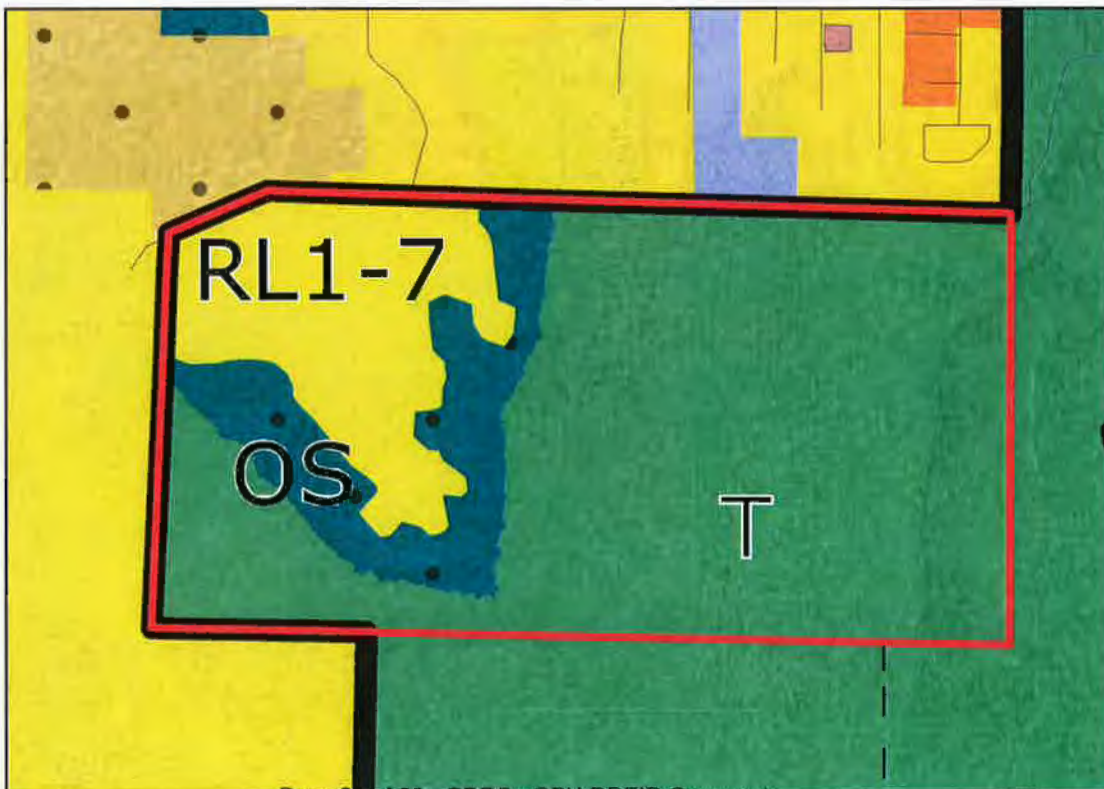
Highways and Roads	Private or Unclassified	Intermittent
Principal Arterials	Major River or Stream	Subsurface
Minor Arterials	Blue Line Streams	
Major Collectors	Perennial 1-3	
Minor Collectors	Perennial >4	
Local Roads		

Scale: 0 350 700 1400 Feet
 0 0.05 0.1 0.2 Miles
 N = 1:9,028 1 in = 752 ft

Source: NRCES, Humboldt County GIS, Humboldt County Office, Esri, HERE, DeLorme, Mapbox, OpenStreetMap contributors, and the GIS user community.
 Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus, CN, USDA, USGS, AeroGRID, IGN, and the GIS User Community
 FRAP, FEMA, USGS

**Comment: #1 RA5-20 change to OS (see above)
 #2 OS change to T (see above)**

Board of
Supervisors
Approved
Land Use



Attachment # 3
 Parcel 017-081-001

County
Land Use
Map



Comment: Change IG to MG; this parcel is within coastal zone

Board of
Supervisors
Approved
Land Use



Attachment # 4
 Parcel 404-141-004

County
Land Use
Map



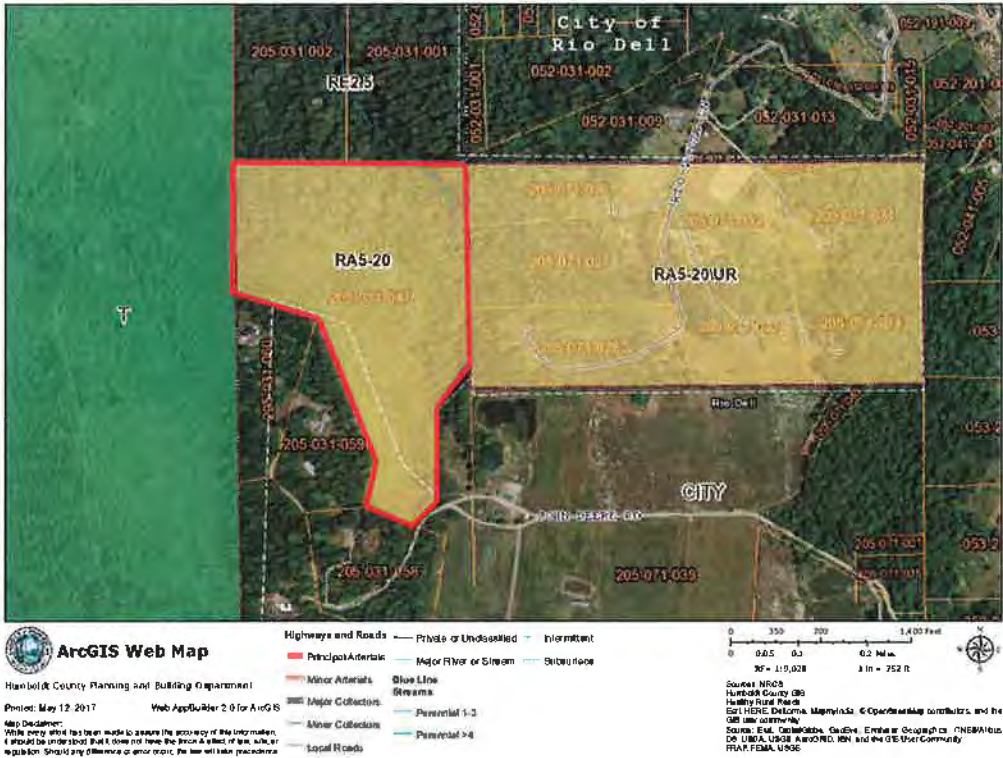
Comment: Remove NR mapping error & replace with MG

Board of
Supervisors
Approved
Land Use



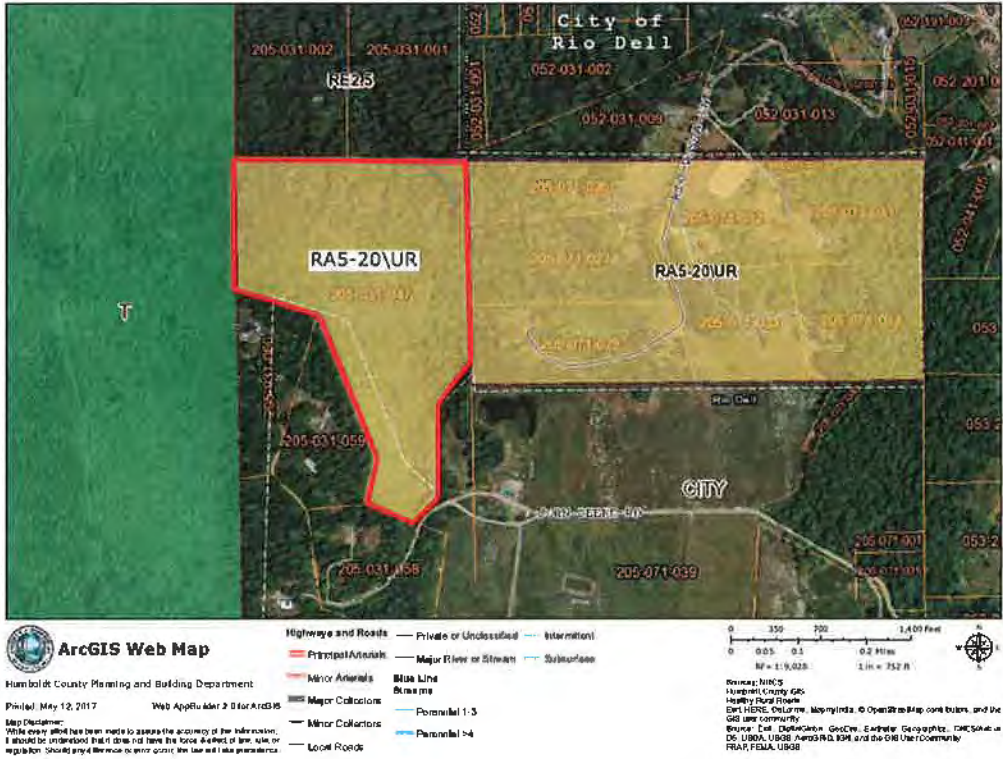
Attachment # 5
 Parcel 205-031-047

County
Land Use
Map



Comment: Change RA5-20 to RA5-20/UR

Board of
Supervisors
Approved
Land Use



Attachment # 6
 Parcel 311-171-007

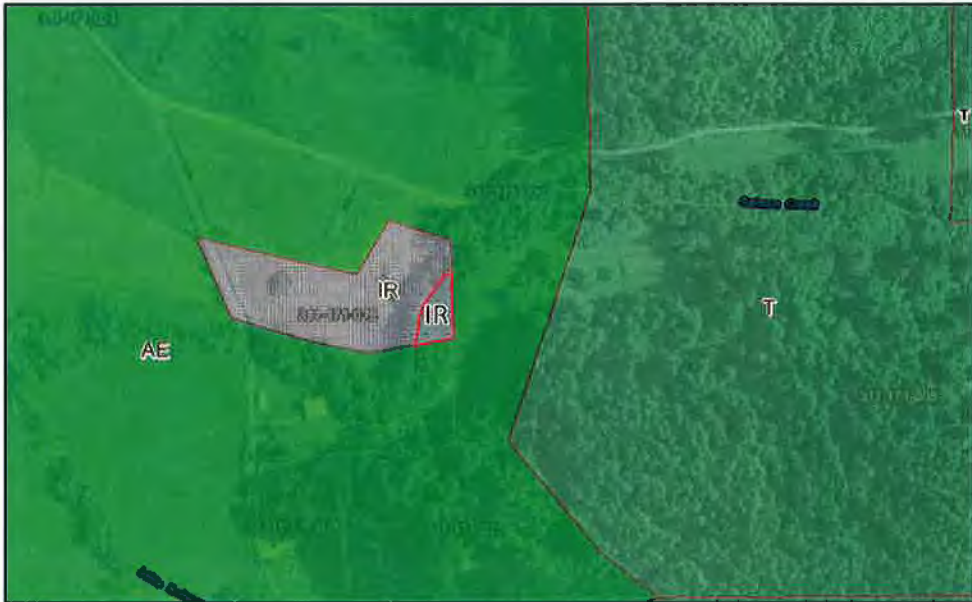
County
Land Use
Map



ArcGIS Web Map
 Humboldt County Planning and Building Department
 Printed: May 12, 2017 Web App: Mar 2 0 for ArcGIS
Map Disclaimer:
 While every effort has been made to ensure the accuracy of the information, it should be understood that it does not warrant the accuracy of any data or information. Should any difference or error occur, the user will take responsibility.
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Comment: Change T to IR

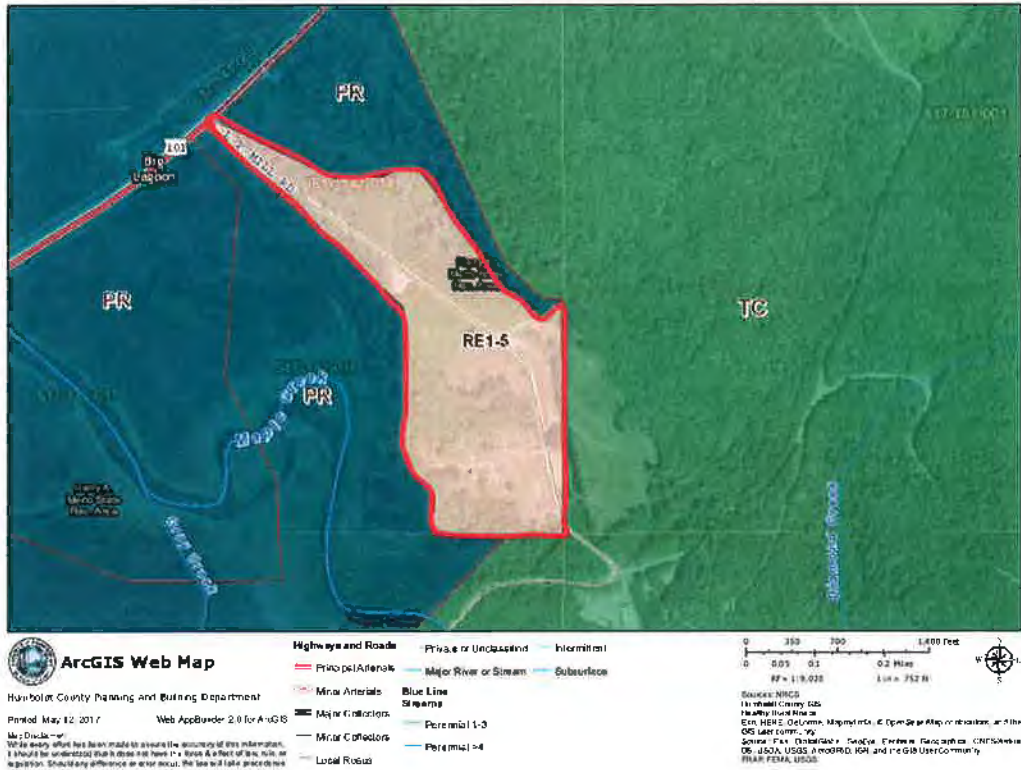
Board of
Supervisors
Approved
Land Use



ArcGIS Web Map
 Humboldt County Planning and Building Department
 Printed: May 17, 2017 Web App: Mar 2 0 for ArcGIS
Map Disclaimer:
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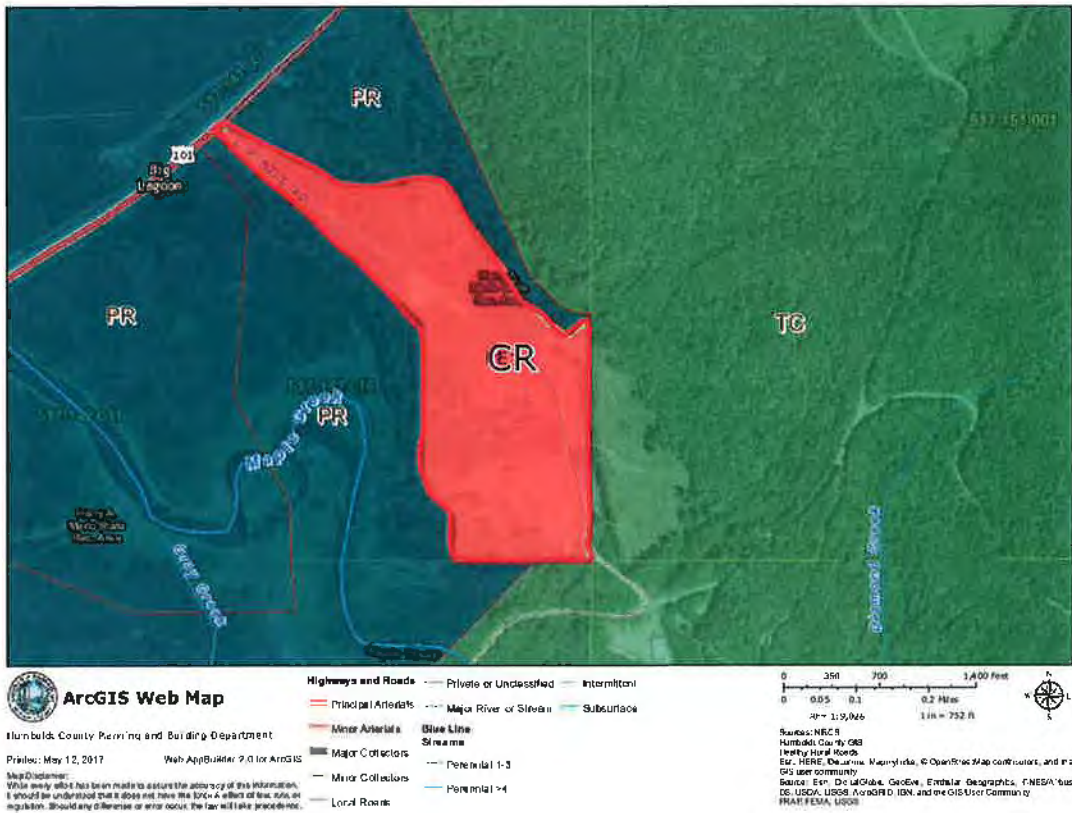
Attachment # 7
 Parcel 517-142-014

County
Land Use
Map



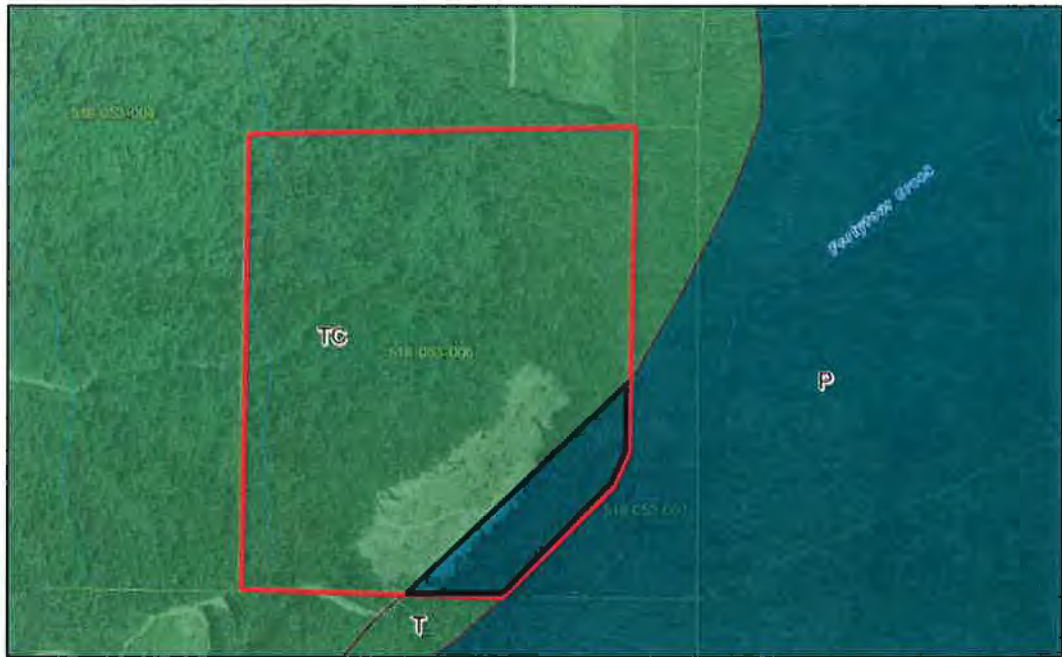
Comment: Change RE1-5 to CR

Board of
Supervisors
Approved
Land Use



Attachment #8
 Parcel 518-053-006

County
Land Use
Map



ArcGIS Web Map
 Humboldt County Planning and Building Department
 Printed: May 19, 2017 Web AppBuilder 2.0 for ArcGIS

Map Disclaimer:
 While every effort has been made to ensure the accuracy of this information, it should be understood that it does not have the force & effect of law, ordinance or regulation. Should any difference or error occur, the law will take precedence.

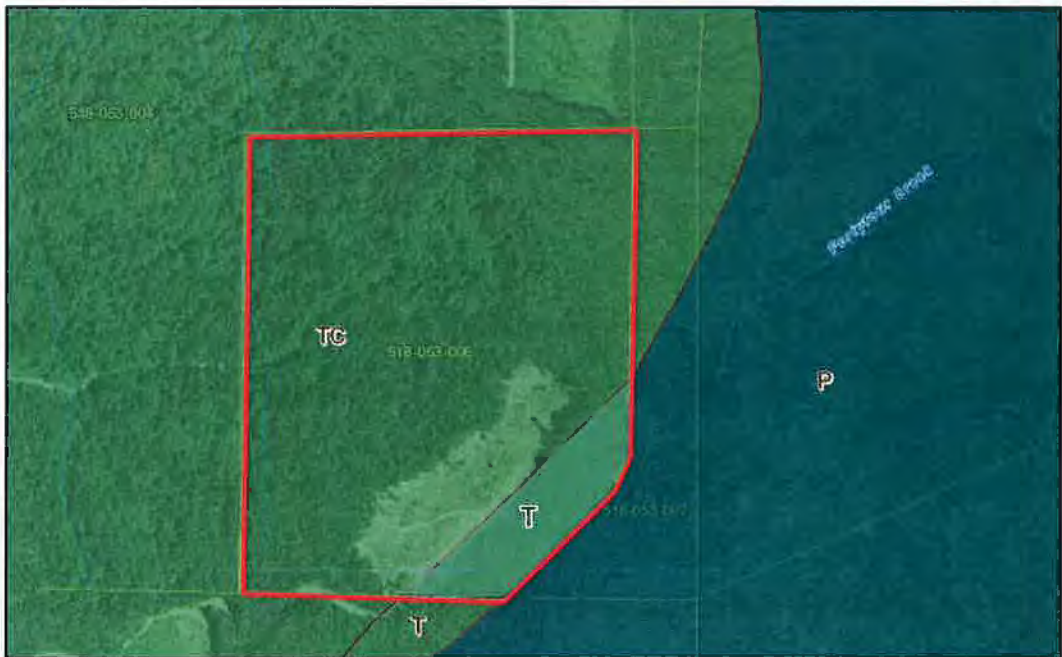
Highways and Roads	— Private or Unclassified	— Intermittent
— Principal Arterials	— Major River or Stream	— Subsurface
— Minor Arterials	— Blue Line Streams	
— Major Collectors	— Potential 1-3	
— Minor Collectors	— Potential 1-4	
— Local Roads		

Scale: 0 350 700 1,400 Feet
 0 0.05 0.1 0.2 Miles
 RF = 1:9,028 1 in = 752 ft

Source: NRCB, Humboldt County GIS, Humboldt County GIS, HERE, DeLorme, Mapbox, OpenStreetMap contributors, and the GIS User Community
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 BAAI/FEMA, USGS

Comment: Change P portion to T

Board of
Supervisors
Approved
Land Use



ArcGIS Web Map
 Humboldt County Planning and Building Department
 Printed: May 19, 2017 Web AppBuilder 2.0 for ArcGIS

Map Disclaimer:
 While every effort has been made to ensure the accuracy of this information, it should be understood that it does not have the force & effect of law, ordinance or regulation. Should any difference or error occur, the law will take precedence.

Highways and Roads	— Private or Unclassified	— Intermittent
— Principal Arterials	— Major River or Stream	— Subsurface
— Minor Arterials	— Blue Line Streams	
— Major Collectors	— Potential 1-3	
— Minor Collectors	— Potential 1-4	
— Local Roads		

Scale: 0 350 700 1,400 Feet
 0 0.05 0.1 0.2 Miles
 RF = 1:9,028 1 in = 752 ft

Source: NRCB, Humboldt County GIS, Humboldt County GIS, HERE, DeLorme, Mapbox, OpenStreetMap contributors, and the GIS User Community
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 BAAI/FEMA, USGS

Attachment D

CALIFORNIA TIMBER HARVEST BY COUNTY
1QTR 1994 TO 4QTR 1994

5/19/95

COUNTY	TIMBER HARVEST VOLUME			HARVEST VALUE		
	(NET MBF)	% of STATE	% GVT	DOLLARS	% of STATE	% GVT
ALAMEDA	0	0.00%		\$ 18,583	0.00%	0
ALPINE	18	0.00%	0	2,226	0.00%	0
AMADOR	26,232	1.13%	2.58	12,405,411	1.12%	1.75
BUTTE	97,724	4.22%	1.57	48,693,611	4.41%	1.82
CALAVERAS	49,663	2.14%	4.45	24,538,370	2.22%	3.38
COLUSA	371	0.02%	0	163,475	0.01%	0
CONTRA COSTA	0	0.00%		32,435	0.00%	0
DEL NORTE	83,434	3.60%	7.51	52,796,735	4.79%	6.44
EL DORADO	129,130	5.57%	12.82	57,354,713	5.20%	11.23
FRESNO	19,213	0.83%	45.79	7,282,874	0.66%	49.49
GLENN	8,557	0.37%	25.76	3,890,732	0.35%	26.90
HUMBOLDT	488,742	21.10%	0.43	283,784,143	25.73%	0.41
IMPERIAL	0	0.00%		-	0.00%	
INYO	0	0.00%		-	0.00%	
KERN	3,438	0.15%	7.13	1,349,254	0.12%	7.92
KINGS	0	0.00%		-	0.00%	
LAKE	7,627	0.33%	0.09	3,668,181	0.33%	0.09
LASSEN	125,854	5.43%	41.93	43,524,101	3.95%	50.74
LOS ANGELES	0	0.00%		147,935	0.01%	0
MADERA	12,852	0.55%	71.16	4,704,120	0.43%	70.66
MARIN	0	0.00%		2,742	0.00%	0
MARIPOSA	2,899	0.13%	6.59	1,055,669	0.10%	6.90
MENDOCINO	227,422	9.82%	3.82	124,594,482	11.29%	3.83
MERCED	0	0.00%		14,020	0.00%	0
MODOC	90,354	3.90%	39.54	35,459,179	3.21%	50.55
MONO	3,875	0.17%	100.00	2,136,627	0.19%	99.72
MONTEREY	0	0.00%		18,543	0.00%	0
NAPA	335	0.01%	0	170,665	0.02%	0
NEVADA	44,108	1.90%	7.96	17,730,390	1.61%	6.77
ORANGE	0	0.00%		52,349	0.00%	0
PLACER	55,668	2.40%	2.69	25,026,152	2.27%	2.61
PLUMAS	104,784	4.52%	36.64	45,736,250	4.15%	33.73
RIVERSIDE	0	0.00%		28,203	0.00%	0
SACRAMENTO	0	0.00%		27,082	0.00%	0
SAN BENITO	0	0.00%		3,246	0.00%	0
SAN BERNARDINO	22	0.00%	0	50,589	0.00%	0.20
SAN DIEGO	0	0.00%		14,102	0.00%	0
SAN FRANCISCO	0	0.00%		-	0.00%	
SAN JOAQUIN	0	0.00%		40,507	0.00%	0
SAN LUIS OBISPO	0	0.00%		16,110	0.00%	0
SAN MATEO	7,540	0.33%	0	4,257,679	0.39%	0
SANTA BARBARA	0	0.00%		18,476	0.00%	0
SANTA CLARA	2,941	0.13%	0	1,718,871	0.16%	0
SANTA CRUZ	22,835	0.99%	0	12,190,062	1.11%	0.08
SHASTA	177,795	7.68%	7.56	65,069,765	5.90%	10.85
SIERRA	34,619	1.49%	47.07	13,764,056	1.25%	48.50
SISKIYOU	180,277	7.78%	28.37	62,684,046	5.68%	28.79
SOLANO	0	0.00%		19,495	0.00%	0
SONOMA	28,042	1.21%	0	14,770,260	1.34%	0
STANISLAUS	0	0.00%		546	0.00%	0
SUTTER	0	0.00%		2,940	0.00%	0
TEHAMA	56,318	2.43%	18.07	27,386,335	2.48%	21.89
TRINITY	94,935	4.10%	4.71	44,533,459	4.04%	5.37
TULARE	12,998	0.56%	52.77	4,635,321	0.42%	54.64
TUOLUMNE	93,489	4.04%	40.92	44,482,903	4.03%	44.27
VENTURA	0	0.00%		92,030	0.01%	0
YOLO	0	0.00%		6,530	0.00%	0
YUBA	22,217	0.96%	7.36	10,954,938	0.99%	7.17
ALL COUNTIES	2,316,328	100.00%	14.53	\$ 1,103,121,518	100.00%	13.46

CALIFORNIA TIMBER HARVEST BY COUNTY
1QTR 1995 TO 4QTR 1995

4/10/96

COUNTY	TIMBER HARVEST VOLUME			HARVEST VALUE		
	(NET MBF)	% of STATE	% GVT	DOLLARS	% of STATE	% GVT
ALAMEDA	0	0.00%		\$ 24,876	0.00%	0.00
ALPINE	152	0.01%	82.24	39,032	0.00%	91.19
AMADOR	22,402	0.97%	1.21	8,787,413	0.93%	1.20
BUTTE	91,686	3.98%	4.26	38,874,228	4.11%	4.56
CALAVERAS	54,359	2.36%	5.55	20,128,129	2.13%	6.40
COLUSA	813	0.04%	0.00	380,480	0.04%	0.00
CONTRA COSTA	0	0.00%		45,671	0.00%	0.00
DEL NORTE	64,036	2.78%	0.15	37,845,052	4.00%	0.22
EL DORADO	124,584	5.41%	9.14	45,799,948	4.84%	7.03
FRESNO	40,471	1.76%	66.56	11,463,244	1.21%	62.94
GLENN	10,582	0.46%	0.00	4,040,026	0.43%	0.00
HUMBOLDT	491,765	21.34%	1.54	235,528,930	24.91%	1.29
IMPERIAL	0	0.00%		-	0.00%	
INYO	0	0.00%	0.00	-	0.00%	0.00
KERN	33	0.00%	0.00	24,013	0.00%	0.00
KINGS	0	0.00%		-	0.00%	
LAKE	7,430	0.32%	0.27	2,749,906	0.29%	0.07
LASSEN	86,040	3.73%	56.74	26,920,865	2.85%	58.93
LOS ANGELES	0	0.00%		141,850	0.02%	0.00
MADERA	5,006	0.22%	23.37	1,635,437	0.17%	18.58
MARIN	3	0.00%	0.00	165	0.00%	0.00
MARIPOSA	4,879	0.21%	1.87	1,717,603	0.18%	1.14
MENDOCINO	211,583	9.18%	7.46	88,250,808	9.34%	7.53
MERCED	0	0.00%		14,592	0.00%	0.00
MODOC	56,750	2.46%	57.20	19,889,877	2.10%	60.74
MONO	9,864	0.43%	100.00	5,378,100	0.57%	99.88
MONTEREY	0	0.00%		19,927	0.00%	0.00
NAPA	890	0.04%	1.01	358,866	0.04%	0.34
NEVADA	51,681	2.24%	5.46	16,978,948	1.80%	4.59
ORANGE	0	0.00%		10,080	0.00%	0.00
PLACER	54,673	2.37%	12.17	20,822,416	2.20%	11.20
PLUMAS	145,302	6.31%	40.45	61,418,586	6.50%	46.11
RIVERSIDE	0	0.00%		36,710	0.00%	0.00
SACRAMENTO	0	0.00%		26,655	0.00%	0.00
SAN BENITO	0	0.00%		-	0.00%	0.00
SAN BERNARDINO	53	0.00%	0.00	59,609	0.01%	0.13
SAN DIEGO	0	0.00%		12,480	0.00%	0.00
SAN FRANCISCO	0	0.00%		-	0.00%	
SAN JOAQUIN	0	0.00%		36,123	0.00%	0.00
SAN LUIS OBISPO	0	0.00%		20,873	0.00%	0.00
SAN MATEO	3,416	0.15%	0.00	1,704,274	0.18%	0.00
SANTA BARBARA	0	0.00%		16,560	0.00%	0.00
SANTA CLARA	1,264	0.05%	0.00	534,581	0.06%	0.00
SANTA CRUZ	26,596	1.15%	0.02	11,034,193	1.17%	0.01
SHASTA	149,734	6.50%	4.68	55,224,722	5.84%	5.12
SIERRA	62,828	2.73%	74.45	17,661,630	1.87%	66.32
SISKIYOU	187,365	8.13%	15.86	62,903,537	6.65%	18.54
SOLANO	0	0.00%		21,244	0.00%	0.00
SONOMA	26,330	1.14%	0.00	11,608,759	1.23%	0.00
STANISLAUS	0	0.00%		3,378	0.00%	0.00
SUTTER	0	0.00%		461	0.00%	0.00
TEHAMA	82,028	3.56%	4.11	33,881,745	3.58%	3.66
TRINITY	114,193	4.96%	16.30	53,482,405	5.66%	16.63
TULARE	10,572	0.46%	80.73	3,534,893	0.37%	84.83
TUOLUMNE	78,593	3.41%	38.51	32,511,664	3.44%	45.31
VENTURA	11	0.00%	0.00	83,797	0.01%	0.00
YOLO	0	0.00%		7,793	0.00%	0.00
YUBA	26,286	1.14%	3.27	11,648,909	1.23%	4.03
ALL COUNTIES	2,304,253	100.00%	16.27	\$ 945,346,063	100.00%	15.13

CALIFORNIA TIMBER HARVEST BY COUNTY
1QTR 1996 TO 4QTR 1996

5/10/97

COUNTY	TIMBER HARVEST VOLUME			HARVEST VALUE		
	(NET MBF)	% of STATE	% GVT	DOLLARS	% of STATE	% GVT
ALAMEDA	0	0.00%		\$ 25,660	0.00%	0
ALPINE	147	0.01%	87.76	31,300	0.00%	94.70
AMADOR	34,798	1.53%	0.07	12,371,176	1.34%	0.05
BUTTE	96,967	4.27%	0.19	40,416,538	4.39%	0.08
CALAVERAS	52,595	2.31%	11.32	18,618,868	2.02%	10.73
COLUSA	364	0.02%	0	139,920	0.02%	0
CONTRA COSTA	0	0.00%		28,181	0.00%	0
DEL NORTE	60,105	2.64%	1.43	34,856,451	3.78%	1.02
EL DORADO	73,140	3.22%	14.72	25,675,978	2.79%	13.12
FRESNO	38,441	1.69%	56.73	10,650,447	1.16%	49.04
GLENN	8,085	0.36%	8.94	2,591,540	0.28%	5.03
HUMBOLDT	517,524	22.77%	1.48	253,521,839	27.53%	0.62
IMPERIAL	0	0.00%		-	0.00%	
INYO	0	0.00%		-	0.00%	
KERN	3,707	0.16%	84.87	1,632,793	0.18%	87.29
KINGS	0	0.00%		-	0.00%	
LAKE	17,956	0.79%	21.79	5,419,756	0.59%	30.48
LASSEN	65,278	2.87%	37.57	23,173,384	2.52%	40.17
LOS ANGELES	0	0.00%		109,516	0.01%	0
MADERA	5,504	0.24%	83.50	1,225,455	0.13%	78.64
MARIN	68	0.00%	0	2,711	0.00%	0
MARIPOSA	3,390	0.15%	2.09	1,133,145	0.12%	1.12
MENDOCINO	275,589	12.12%	9.31	118,830,711	12.90%	10.27
MERCED	0	0.00%		8,760	0.00%	0
MODOC	30,342	1.33%	54.00	11,777,828	1.28%	50.79
MONO	3,363	0.15%	97.92	1,513,998	0.16%	98.25
MONTEREY	0	0.00%		14,923	0.00%	0
NAPA	1,803	0.08%	0	658,767	0.07%	0
NEVADA	61,832	2.72%	7.85	20,258,258	2.20%	7.22
ORANGE	0	0.00%		60,271	0.01%	0
PLACER	49,285	2.17%	5.22	16,508,086	1.79%	5.67
PLUMAS	105,651	4.65%	9.58	36,838,955	4.00%	8.94
RIVERSIDE	0	0.00%		26,412	0.00%	0
SACRAMENTO	0	0.00%		51,175	0.01%	0
SAN BENITO	0	0.00%		-	0.00%	
SAN BERNARDINO	79	0.00%	0	50,479	0.01%	0
SAN DIEGO	0	0.00%		20,121	0.00%	0
SAN FRANCISCO	26	0.00%	0	26	0.00%	0
SAN JOAQUIN	0	0.00%		33,772	0.00%	0
SAN LUIS OBISPO	0	0.00%		19,398	0.00%	0
SAN MATEO	7,170	0.32%	0	3,686,995	0.40%	0
SANTA BARBARA	0	0.00%		11,520	0.00%	0
SANTA CLARA	2,657	0.12%	0	1,327,457	0.14%	0
SANTA CRUZ	25,394	1.12%	0	11,508,367	1.25%	0
SHASTA	167,977	7.39%	7.15	57,279,061	6.22%	8.86
SIERRA	58,327	2.57%	40.41	16,760,501	1.82%	33.48
SISKIYOU	178,701	7.86%	24.05	63,935,125	6.94%	22.43
SOLANO	0	0.00%		17,980	0.00%	0
SONOMA	32,698	1.44%	6.27	14,059,967	1.53%	6.47
STANISLAUS	0	0.00%		814	0.00%	0
SUTTER	3	0.00%	0	3	0.00%	0
TEHAMA	103,753	4.56%	3.35	40,276,583	4.37%	3.52
TRINITY	73,808	3.25%	41.31	30,363,344	3.30%	44.48
TULARE	9,603	0.42%	87.16	3,509,824	0.38%	91.81
TUOLUMNE	73,662	3.24%	23.27	26,067,788	2.83%	23.50
VENTURA	0	0.00%		83,653	0.01%	0
YOLO	0	0.00%		4,666	0.00%	0
YUBA	33,136	1.46%	0.99	13,752,569	1.49%	0.75
ALL COUNTIES	2,272,928	100%	12.66	\$ 920,942,815	100%	11.05

CALIFORNIA TIMBER HARVEST BY COUNTY

REPORT Y1-36

4/17/98

YTR90-97.XLS

1QTR 1997 TO 4QTR 1997

COUNTY	TIMBER HARVEST VOLUME			HARVEST VALUE		
	(NET MBF)	% of STATE	% GVT	DOLLARS	% of STATE	% GVT
ALAMEDA	-	0.00%	0.00	\$ 26,592	0.00%	0
ALPINE	3,710	0.15%	18.89	422,533	0.05%	18.88
AMADOR	20,064	0.84%	20.29	5,902,553	0.68%	15.73
BUTTE	91,606	3.82%	4.58	32,603,394	3.76%	2.41
CALAVERAS	61,092	2.55%	3.08	20,183,738	2.33%	2.79
COLUSA	281	0.01%	0.00	88,920	0.01%	0
CONTRA COSTA	-	0.00%	0.00	17,488	0.00%	0
DEL NORTE	46,658	1.94%	0.77	23,819,084	2.74%	0.64
EL DORADO	91,892	3.83%	22.18	27,049,500	3.12%	18.64
FRESNO	23,227	0.97%	57.78	6,146,102	0.71%	56.11
GLENN	18,944	0.79%	19.10	6,884,614	0.79%	9.64
HUMBOLDT	531,151	22.13%	2.16	238,010,572	27.43%	1.46
IMPERIAL	-	0.00%	-	-	0.00%	-
INYO	437	0.02%	100.00	216,785	0.02%	100.00
KERN	1,662	0.07%	15.04	353,863	0.04%	11.61
KINGS	-	0.00%	-	-	0.00%	-
LAKE	15,233	0.63%	8.41	4,105,171	0.47%	8.82
LASSEN	52,279	2.18%	38.72	17,421,558	2.01%	34.45
LOS ANGELES	-	0.00%	0.00	39,801	0.00%	0
MADERA	9,978	0.42%	79.29	2,413,335	0.28%	79.89
MARIN	-	0.00%	-	-	0.00%	-
MARIPOSA	4,823	0.20%	13.02	1,152,380	0.13%	10.78
MENDOCINO	243,866	10.16%	13.87	94,772,858	10.92%	13.07
MERCED	-	0.00%	0.00	7,792	0.00%	0
MODOC	41,906	1.75%	44.17	13,885,584	1.60%	39.09
MONO	527	0.02%	100.00	225,975	0.03%	99.77
MONTEREY	-	0.00%	0.00	10,655	0.00%	0
NAPA	771	0.03%	0.00	232,805	0.03%	0
NEVADA	75,818	3.16%	12.29	22,389,516	2.58%	11.90
ORANGE	-	0.00%	0.00	55,192	0.01%	0
PLACER	51,211	2.13%	30.19	16,380,617	1.89%	29.37
PLUMAS	147,794	6.16%	27.83	46,097,875	5.31%	26.31
RIVERSIDE	-	0.00%	0.00	16,313	0.00%	0
SACRAMENTO	-	0.00%	0.00	33,465	0.00%	0
SAN BENITO	-	0.00%	-	-	0.00%	-
SAN BERNARDINO	132	0.01%	0.00	40,194	0.00%	0
SAN DIEGO	-	0.00%	0.00	5,675	0.00%	0
SAN FRANCISCO	-	0.00%	-	-	0.00%	-
SAN JOAQUIN	-	0.00%	0.00	26,147	0.00%	0
SAN JUAN OBISPO	-	0.00%	0.00	16,944	0.00%	0
SAN MATEO	8,022	0.33%	0.00	3,575,135	0.41%	0
SANTA BARBARA	-	0.00%	0.00	10,800	0.00%	0
SANTA CLARA	1,185	0.05%	0.00	510,573	0.06%	0
SANTA CRUZ	26,465	1.10%	0.00	10,450,097	1.20%	0
SHASTA	151,040	6.29%	10.03	47,344,813	5.46%	8.74
SIERRA	43,398	1.81%	29.13	12,963,823	1.49%	26.63
SISKIYOU	250,804	10.45%	25.45	83,427,613	9.61%	21.38
SOLOANO	-	0.00%	0.00	12,399	0.00%	0
SONOMA	31,739	1.32%	0.52	11,137,205	1.28%	0.05
STANISLAUS	-	0.00%	0.00	684	0.00%	0
SUTTER	-	0.00%	-	-	0.00%	-
TEHAMA	113,011	4.71%	1.48	39,713,257	4.58%	1.29
TRINITY	98,512	4.11%	19.19	34,024,664	3.92%	17.24
TULARE	9,272	0.39%	73.18	2,176,527	0.25%	69.44
TUOLUMNE	90,149	3.76%	26.02	26,356,524	3.04%	21.44
VENTURA	-	0.00%	0.00	58,526	0.01%	0
YOLO	-	0.00%	-	-	0.00%	-
YUBA	41,013	1.71%	12.37	14,916,864	1.72%	11.51
ALL COUNTIES	2,399,672	100%	14.89	\$867,735,094	100%	11.77

COUNTY	TIMBER HARVEST VOLUME			HARVEST VALUE		
	(NET MBF)	% of STATE	% GVT	DOLLARS	% of STATE	% GVT
ALAMEDA	-	0.00%	0.00	\$ 25,209	0.00%	0
ALPINE	312	0.01%	56.41	68,930	0.01%	51.04
AMADOR	32,680	1.56%	18.04	9,721,692	1.28%	10.07
BUTTE	97,495	4.66%	1.61	33,670,434	4.44%	1.36
CALAVERAS	53,691	2.57%	2.36	16,715,511	2.20%	1.42
COLUSA	150	0.01%	0.00	37,370	0.00%	0.00
CONTRA COSTA	-	0.00%	0.00	16,323	0.00%	0.00
DEL NORTE	47,164	2.26%	3.05	23,385,403	3.08%	2.29
EL DORADO	99,514	4.76%	31.03	27,640,268	3.64%	21.74
FRESNO	21,010	1.00%	63.26	5,907,319	0.78%	61.84
GLENN	28,800	1.38%	15.92	10,697,843	1.41%	19.60
HUMBOLDT	450,629	21.55%	1.33	203,494,572	26.81%	1.01
IMPERIAL	-	0.00%	0.00	-	0.00%	0.00
INYO	-	0.00%	0.00	-	0.00%	0.00
KERN	2,632	0.13%	0.34	672,646	0.09%	0.11
KINGS	-	0.00%	0.00	-	0.00%	0.00
LAKE	16,454	0.79%	59.86	4,520,045	0.60%	58.92
LASSEN	56,239	2.69%	28.84	19,350,286	2.55%	30.37
LOS ANGELES	-	0.00%	0.00	15,133	0.00%	0.00
MADERA	8,982	0.43%	92.63	2,141,611	0.28%	92.97
MARIN	-	0.00%	0.00	-	0.00%	0.00
MARIPOSA	4,246	0.20%	0.00	1,304,514	0.17%	0.00
MENDOCINO	225,878	10.80%	1.15	96,490,920	12.71%	0.83
MERCED	-	0.00%	0.00	8,740	0.00%	0.00
MODOC	18,752	0.90%	47.34	5,997,939	0.79%	50.32
MONO	4,836	0.23%	96.79	2,458,635	0.32%	98.71
MONTEREY	-	0.00%	0.00	10,801	0.00%	0.00
NAPA	860	0.04%	0.00	236,523	0.03%	0.00
NEVADA	60,854	2.91%	24.74	19,037,475	2.51%	23.02
ORANGE	-	0.00%	0.00	53,503	0.01%	0.00
PLACER	65,320	3.12%	22.18	19,628,305	2.59%	17.18
PLUMAS	109,038	5.22%	14.42	33,740,915	4.45%	11.88
RIVERSIDE	-	0.00%	0.00	26,619	0.00%	0.00
SACRAMENTO	-	0.00%	0.00	33,786	0.00%	0.00
SAN BENITO	-	0.00%	0.00	-	0.00%	0.00
SAN BERNARDINO	100	0.00%	0.00	43,459	0.01%	0.00
SAN DIEGO	-	0.00%	0.00	15,066	0.00%	0.00
SAN FRANCISCO	-	0.00%	0.00	-	0.00%	0.00
SAN JOAQUIN	-	0.00%	0.00	27,792	0.00%	0.00
SAN LUIS OBISPO	-	0.00%	0.00	17,458	0.00%	0.00
SAN MATEO	3,561	0.17%	0.00	1,557,316	0.21%	0.00
SANTA BARBARA	-	0.00%	0.00	10,080	0.00%	0.00
SANTA CLARA	848	0.04%	0.00	416,179	0.05%	0.00
SANTA CRUZ	22,366	1.07%	0.18	8,928,905	1.18%	0.27
SHASTA	148,935	7.12%	4.48	47,668,627	6.28%	3.14
SIERRA	21,757	1.04%	35.47	6,387,532	0.84%	34.72
SISKIYOU	189,237	9.05%	24.52	59,346,549	7.82%	23.69
SOLANO	-	0.00%	0.00	14,686	0.00%	0.00
SONOMA	20,509	0.98%	0.00	7,768,131	1.02%	0.00
STANISLAUS	-	0.00%	0.00	648	0.00%	0.00
SUTTER	-	0.00%	0.00	-	0.00%	0.00
TEHAMA	83,428	3.99%	5.26	28,648,349	3.77%	4.60
TRINITY	109,905	5.26%	15.16	35,846,666	4.72%	14.46
TULARE	8,362	0.40%	58.97	2,212,659	0.29%	68.09
TUOLUMNE	53,455	2.56%	9.30	15,282,428	2.01%	5.01
VENTURA	-	0.00%	0.00	74,680	0.01%	0.00
YOLO	-	0.00%	0.00	-	0.00%	0.00
YUBA	22,716	1.09%	6.71	7,649,761	1.01%	3.39
ALL COUNTIES	2,090,715	100%	12.16	\$759,026,241	100%	9.41

CALIFORNIA TIMBER HARVEST BY COUNTY

1QTR 1999 TO 4QTR 1999

COUNTY	TIMBER HARVEST VOLUME			HARVEST VALUE		
	(NET MBF)	% of STATE	% GVT	DOLLARS	% of STATE	% GVT
ALAMEDA	-	0.00%	0.00	\$ 23,006	0.00%	0.00
ALPINE	110	0.01%	0.00	32,250	0.00%	0.00
AMADOR	28,867	1.35%	17.80	8,448,057	1.11%	14.98
BUTTE	90,918	4.24%	0.11	29,484,325	3.86%	0.09
CALAVERAS	66,963	3.12%	6.69	19,908,264	2.61%	5.35
COLUSA	133	0.01%	0.00	39,579	0.01%	0.00
CONTRA COSTA	-	0.00%	0.00	15,732	0.00%	0.00
DEL NORTE	51,088	2.38%	0.00	26,034,856	3.41%	0.00
EL DORADO	126,065	5.88%	40.22	31,760,948	4.16%	28.31
FRESNO	31,683	1.48%	69.91	8,775,155	1.15%	65.64
GLENN	29,728	1.39%	0.92	9,385,474	1.23%	0.74
HUMBOLDT	386,496	18.03%	1.62	181,480,903	23.76%	0.79
IMPERIAL	-	0.00%	0.00	-	0.00%	0.00
INYO	-	0.00%	0.00	-	0.00%	0.00
KERN	3,763	0.18%	21.47	1,032,180	0.14%	12.48
KINGS	-	0.00%	0.00	-	0.00%	0.00
LAKE	5,017	0.23%	2.67	1,500,886	0.20%	1.85
LASSEN	63,800	2.98%	24.63	17,110,506	2.24%	17.51
LOS ANGELES	-	0.00%	0.00	14,719	0.00%	0.00
MADERA	8,228	0.38%	57.41	2,081,929	0.27%	52.06
MARIN	-	0.00%	0.00	-	0.00%	0.00
MARIPOSA	3,529	0.16%	0.00	1,003,910	0.13%	0.00
MENDOCINO	227,515	10.61%	0.46	105,683,106	13.84%	0.39
MERCED	-	0.00%	0.00	9,694	0.00%	0.00
MODOC	23,247	1.08%	6.59	7,266,508	0.95%	6.23
MONO	-	0.00%	0.00	20,265	0.00%	98.00
MONTEREY	-	0.00%	0.00	9,976	0.00%	0.00
NAPA	1,318	0.06%	0.00	354,725	0.05%	0.00
NEVADA	45,007	2.10%	24.64	13,600,777	1.78%	22.85
ORANGE	-	0.00%	0.00	7,056	0.00%	0.00
PLACER	41,997	1.96%	26.79	11,829,946	1.55%	20.68
PLUMAS	176,830	8.25%	14.60	52,587,704	6.89%	12.10
RIVERSIDE	-	0.00%	0.00	27,121	0.00%	0.00
SACRAMENTO	-	0.00%	0.00	24,026	0.00%	0.00
SAN BENITO	-	0.00%	0.00	-	0.00%	0.00
SAN BERNARDINO	-	0.00%	0.00	15,289	0.00%	0.00
SAN DIEGO	-	0.00%	0.00	12,958	0.00%	0.00
SAN FRANCISCO	-	0.00%	0.00	-	0.00%	0.00
SAN JOAQUIN	-	0.00%	0.00	17,543	0.00%	0.00
SAN LUIS OBISPO	-	0.00%	0.00	18,377	0.00%	0.00
SAN MATEO	4,675	0.22%	0.00	2,440,280	0.32%	0.00
SANTA BARBARA	-	0.00%	0.00	5,040	0.00%	0.00
SANTA CLARA	3,430	0.16%	0.00	1,728,291	0.23%	0.00
SANTA CRUZ	16,162	0.75%	0.00	7,862,890	1.03%	0.18
SHASTA	155,660	7.26%	2.94	49,412,637	6.47%	2.54
SIERRA	34,766	1.62%	19.71	10,712,573	1.40%	21.02
SISKIYOU	198,817	9.27%	21.76	57,845,413	7.57%	19.25
SOLANO	-	0.00%	0.00	12,161	0.00%	0.00
SONOMA	30,918	1.44%	0.00	14,231,374	1.86%	0.00
STANISLAUS	-	0.00%	0.00	468	0.00%	0.00
SUTTER	-	0.00%	0.00	-	0.00%	0.00
TEHAMA	98,816	4.61%	0.66	33,003,810	4.32%	0.79
TRINITY	97,508	4.55%	7.97	30,283,140	3.96%	6.24
TULARE	7,894	0.37%	85.56	2,108,570	0.28%	86.75
TUOLUMNE	47,501	2.22%	17.55	12,518,801	1.64%	10.65
VENTURA	-	0.00%	0.00	66,115	0.01%	0.00
YOLO	-	0.00%	0.00	-	0.00%	0.00
YUBA	35,702	1.67%	4.45	11,938,012	1.56%	3.39
ALL COUNTIES	2,144,151	100%	11.24	\$763,787,325	100%	7.34

CALIFORNIA TIMBER HARVEST BY COUNTY
1 QTR 2000 TO 4 QTR 2000

YT-36 Report

04/05/2001

COUNTY	Timber Harvest Volume			Harvest Value		
	(NET MBF)	% of State	% Gvt	Dollars	% of State	% Gvt
ALAMEDA	0	0.00%	0.00	\$19,472	0.00	0.00
ALPINE	0	0.00%	0.00	\$0	0.00	0.00
AMADOR	28423	1.45%	22.53	\$9,982,039	1.10	21.75
BUTTE	85791	4.36%	4.13	\$33,483,906	3.68	1.91
CALAVERAS	49070	2.50%	7.72	\$15,174,086	1.67	6.43
COLUSA	0	0.00%	0.00	\$0	0.00	0.00
CONTRA COSTA	0	0.00%	0.00	\$13,917	0.00	0.00
DEL NORTE	46133	2.35%	3.48	\$38,584,028	4.24	0.96
EL DORADO	107498	5.47%	54.94	\$28,207,613	3.10	43.96
FRESNO	16301	0.83%	55.25	\$4,916,738	0.54	44.42
GLENN	16522	0.84%	37.02	\$5,633,640	0.62	48.02
HUMBOLDT	388886	19.78%	0.18	\$285,230,574	31.42	0.27
IMPERIAL	0	0.00%	0.00	\$0	0.00	0.00
INYO	0	0.00%	0.00	\$0	0.00	0.00
KERN	5253	0.27%	1.37	\$1,386,905	0.15	0.50
KINGS	0	0.00%	0.00	\$0	0.00	0.00
LAKE	6146	0.31%	3.56	\$2,215,702	0.24	3.25
LASSEN	60566	3.08%	13.61	\$20,653,676	2.27	8.57
LOS ANGELES	0	0.00%	0.00	\$18,119	0.00	0.00
MADERA	3196	0.16%	99.22	\$772,931	0.09	98.04
MARIN	0	0.00%	0.00	\$0	0.00	0.00
MARIPOSA	2746	0.14%	0.00	\$863,375	0.09	0.00
MENDOCINO	156101	7.94%	5.78	\$114,636,073	12.61	3.59
MERCED	0	0.00%	0.00	\$7,089	0.00	0.00
MODOC	41628	2.12%	7.18	\$12,031,131	1.32	10.27
MONO	0	0.00%	0.00	\$17,115	0.00	100.00
MONTEREY	0	0.00%	0.00	\$9,390	0.00	0.00
NAPA	649	0.03%	0.00	\$273,099	0.03	0.00
NEVADA	47250	2.40%	33.66	\$15,168,618	1.67	24.96
ORANGE	0	0.00%	0.00	\$47,366	0.01	0.00
PLACER	32452	1.65%	18.20	\$9,658,759	1.06	14.05
PLUMAS	154225	7.85%	12.17	\$49,224,004	5.41	7.14
RIVERSIDE	0	0.00%	0.00	\$28,025	0.00	0.00
SACRAMENTO	0	0.00%	0.00	\$17,488	0.00	0.00
SAN BENITO	0	0.00%	0.00	\$0	0.00	0.00
SAN BERNARDINO	0	0.00%	0.00	\$13,050	0.00	0.00
SAN DIEGO	0	0.00%	0.00	\$10,763	0.00	0.00
SAN FRANCISCO	0	0.00%	0.00	\$0	0.00	0.00
SAN JOAQUIN	0	0.00%	0.00	\$14,950	0.00	0.00
SAN LUIS OBISPO	0	0.00%	0.00	\$11,310	0.00	0.00
SAN MATEO	4505	0.23%	0.00	\$4,533,439	0.50	0.00
SANTA BARBARA	0	0.00%	0.00	\$2,880	0.00	0.00
SANTA CLARA	3954	0.20%	0.00	\$3,867,213	0.43	0.00
SANTA CRUZ	18414	0.94%	0.00	\$14,035,783	1.54	0.00
SHASTA	144640	7.36%	5.75	\$49,005,685	5.39	5.36
SIERRA	40848	2.08%	40.45	\$12,359,580	1.36	31.17
SISKIYOU	193408	9.84%	18.45	\$63,797,993	7.02	17.04
SOLANO	0	0.00%	0.00	\$12,982	0.00	0.00
SONOMA	24157	1.23%	0.00	\$19,493,979	2.14	0.00
STANISLAUS	0	0.00%	0.00	\$144	0.00	0.00
SUTTER	0	0.00%	0.00	\$0	0.00	0.00
TEHAMA	100887	5.13%	3.66	\$35,558,676	3.91	4.46
TRINITY	72735	3.70%	4.54	\$24,812,648	2.73	4.64
TULARE	5445	0.28%	71.66	\$1,529,738	0.17	71.29
TUOLUMNE	61061	3.11%	35.72	\$17,726,595	1.95	26.57
VENTURA	0	0.00%	0.00	\$73,549	0.01	0.00
YOLO	0	0.00%	0.00	\$0	0.00	0.00
YUBA	46767	2.38%	36.44	\$13,930,700	1.53	28.98
ALL COUNTIES	1965657	100.00%	13.47	\$909,066,535	100.00	7.56

CALIFORNIA TIMBER HARVEST BY COUNTY
1 QTR 2001 TO 4 QTR 2001

COUNTY	VOLUME	% VOL	% PUBLIC	VALUE	% VALUE	% PUBLIC
ALAMEDA	0	0.00	0.00	\$12,986	0.00	0.00
ALPINE	0	0.00	0.00	\$0	0.00	0.00
AMADOR	17,079	1.07	8.33	\$5,428,799	0.94	4.54
BUTTE	92,562	5.77	0.03	\$32,878,252	5.71	0.01
CALAVERAS	34,964	2.18	19.08	\$8,133,192	1.41	15.87
COLUSA	0	0.00	0.00	\$0	0.00	0.00
CONTRA COSTA	0	0.00	0.00	\$7,128	0.00	0.00
DEL NORTE	22,691	1.42	0.33	\$15,156,108	2.63	0.08
EL DORADO	96,830	6.04	37.44	\$23,665,220	4.11	28.01
FRESNO	12,215	0.76	40.56	\$3,496,298	0.61	28.38
GLENN	962	0.06	18.40	\$206,860	0.04	20.28
HUMBOLDT	358,225	22.34	0.00	\$190,568,685	33.14	0.00
IMPERIAL	0	0.00	0.00	\$0	0.00	0.00
INYO	0	0.00	0.00	\$0	0.00	0.00
KERN	0	0.00	0.00	\$15,544	0.00	0.00
KINGS	0	0.00	0.00	\$0	0.00	0.00
LAKE	2,932	0.18	0.00	\$771,454	0.13	0.00
LASSEN	54,683	3.41	7.41	\$14,792,790	2.57	4.95
LOS ANGELES	0	0.00	0.00	\$10,843	0.00	0.00
MADERA	6,672	0.42	67.61	\$1,352,615	0.23	51.05
MARIN	0	0.00	0.00	\$0	0.00	0.00
MARIPOSA	4,133	0.26	0.77	\$1,306,815	0.23	0.18
MENDOCINO	117,596	7.33	2.67	\$52,437,479	9.11	2.45
MERCED	0	0.00	0.00	\$5,146	0.00	0.00
MODOC	27,166	1.69	13.41	\$6,904,355	1.20	11.04
MONO	0	0.00	0.00	\$13,665	0.00	100.00
MONTEREY	0	0.00	0.00	\$6,548	0.00	0.00
NAPA	490	0.03	34.29	\$141,519	0.02	37.26
NEVADA	39,884	2.49	18.97	\$11,776,364	2.05	14.13
ORANGE	0	0.00	0.00	\$25,872	0.00	0.00
PLACER	56,891	3.55	11.90	\$13,430,303	2.33	10.01
PLUMAS	99,241	6.19	4.71	\$29,136,282	5.06	2.79
RIVERSIDE	0	0.00	0.00	\$21,066	0.00	0.00
SACRAMENTO	0	0.00	0.00	\$19,368	0.00	0.00
SAN BENITO	0	0.00	0.00	\$0	0.00	0.00
SAN BERNARDINO	1,397	0.09	74.95	\$161,433	0.03	51.89
SAN DIEGO	0	0.00	0.00	\$9,460	0.00	0.00
SAN FRANCISCO	0	0.00	0.00	\$0	0.00	0.00
SAN JOAQUIN	0	0.00	0.00	\$12,348	0.00	0.00
SAN LUIS OBISPO	0	0.00	0.00	\$7,932	0.00	0.00
SAN MATEO	4,151	0.26	0.00	\$2,741,589	0.48	0.00
SANTA BARBARA	0	0.00	0.00	\$1,440	0.00	0.00
SANTA CLARA	3,432	0.21	0.00	\$2,892,323	0.50	0.00
SANTA CRUZ	7,230	0.45	0.00	\$4,701,393	0.82	0.00
SHASTA	144,513	9.01	3.07	\$40,399,186	7.02	1.99
SIERRA	24,533	1.53	24.69	\$5,729,742	1.00	23.50
SISKIYOU	134,829	8.41	8.33	\$36,224,679	6.29	6.36
SOLANO	0	0.00	0.00	\$15,508	0.00	0.00
SONOMA	9,559	0.60	0.00	\$5,218,255	0.91	0.00
STANISLAUS	0	0.00	0.00	\$0	0.00	0.00
SUTTER	0	0.00	0.00	\$0	0.00	0.00
TEHAMA	63,783	3.98	0.04	\$19,778,495	3.44	0.03
TRINITY	83,590	5.21	1.99	\$24,022,909	4.17	2.16
TULARE	4,844	0.30	53.55	\$533,171	0.09	36.43
TUOLUMNE	52,452	3.27	20.60	\$13,235,142	2.30	16.97
VENTURA	0	0.00	0.00	\$78,096	0.01	0.00
YOLO	0	0.00	0.00	\$0	0.00	0.00
YUBA	23,849	1.49	24.95	\$8,202,912	1.42	16.09
ALL COUNTIES	1,603,378	100.00	7.97	\$575,687,569	100.00	4.41

COUNTY	VOLUME (NET MBF)	VOLUME PERCENT	PERCENT PUBLIC	VALUE	VALUE PERCENT	PERCENT PUBLIC
ALAMEDA	0	0.00	0.00	\$11,319	0.00	0.00
ALPINE	363	0.02	0.00	\$65,500	0.01	0.00
AMADOR	28,310	1.67	19.21	\$6,668,845	1.48	9.32
BUTTE	63,421	3.75	0.00	\$18,056,154	3.99	0.00
CALAVERAS	48,493	2.87	18.09	\$13,079,754	2.89	13.66
COLUSA	0	0.00	0.00	0	0.00	0.00
CONTRA COSTA	0	0.00	0.00	0	0.00	0.00
DEL NORTE	23,906	1.41	0.00	\$9,645,174	2.13	0.00
EL DORADO	104,435	6.18	42.02	\$19,444,886	4.30	28.79
FRESNO	12,745	0.75	22.24	\$3,196,954	0.71	12.94
GLENN	3,080	0.18	28.08	\$771,620	0.17	25.02
HUMBOLDT	374,041	22.14	0.00	\$130,554,325	28.90	0.00
IMPERIAL	0	0.00	0.00	0	0.00	0.00
INYO	0	0.00	0.00	0	0.00	0.00
KERN	521	0.03	0.00	\$189,878	0.04	0.00
KINGS	0	0.00	0.00	0	0.00	0.00
LAKE	61	0.00	0.00	\$11,880	0.00	0.00
LASSEN	85,106	5.04	12.89	\$18,269,984	4.04	7.27
LOS ANGELES	0	0.00	0.00	\$10,080	0.00	0.00
MADERA	5,905	0.35	84.34	\$1,124,825	0.25	78.55
MARIN	0	0.00	0.00	0	0.00	0.00
MARTIPOSA	3,187	0.19	0.00	\$843,980	0.19	0.00
MENDOCINO	97,722	5.78	0.19	\$29,479,471	6.52	0.06
MERCED	0	0.00	0.00	\$6,060	0.00	0.00
MODOC	29,109	1.72	0.26	\$4,330,330	0.96	0.24
MONO	153	0.01	0.00	\$58,820	0.01	41.99
MONTEREY	0	0.00	0.00	\$4,321	0.00	0.00
NAPA	441	0.03	43.31	\$131,897	0.03	48.11
NEVADA	50,000	2.96	18.82	\$11,538,188	2.55	11.46
ORANGE	0	0.00	0.00	0	0.00	0.00
PLACER	49,927	2.95	24.03	\$9,722,916	2.15	26.02
PLUMAS	79,802	4.72	24.39	\$17,507,215	3.87	16.58
RIVERSIDE	218	0.01	0.00	\$43,422	0.01	0.00
SACRAMENTO	0	0.00	0.00	\$24,552	0.01	0.00
SAN BENITO	0	0.00	0.00	0	0.00	0.00
SAN BERNARDINO	0	0.00	0.00	\$10,963	0.00	0.00
SAN DIEGO	194	0.01	0.00	\$21,985	0.00	0.00
SAN FRANCISCO	0	0.00	0.00	0	0.00	0.00
SAN JOAQUIN	0	0.00	0.00	\$10,495	0.00	0.00
SAN LUIS OBISPO	0	0.00	0.00	\$6,940	0.00	0.00
SAN MATEO	2,878	0.17	0.00	\$1,176,131	0.26	0.00
SANTA BARBARA	0	0.00	0.00	\$1,224	0.00	0.00
SANTA CLARA	599	0.04	0.00	\$300,336	0.07	0.00
SANTA CRUZ	9,136	0.54	0.00	\$4,073,573	0.90	0.00
SHASTA	152,104	9.00	0.62	\$39,261,247	8.69	0.27
SIERRA	33,342	1.97	22.41	\$6,591,583	1.46	14.64
SISKIYOU	187,215	11.08	11.03	\$40,458,236	8.95	8.37
SOLANO	0	0.00	0.00	\$2,252	0.00	0.00
SONOMA	9,671	0.57	0.00	\$3,482,865	0.77	0.00
STANISLAUS	0	0.00	0.00	0	0.00	0.00
SUTTER	0	0.00	0.00	0	0.00	0.00
TEHAMA	65,220	3.86	0.06	\$17,335,563	3.83	0.03
TRINITY	81,086	4.80	0.88	\$23,312,547	5.16	0.69
TULARE	7,255	0.43	63.93	\$1,170,345	0.26	61.52
TUOLUMNE	63,190	3.74	25.45	\$14,362,772	3.18	16.15
VENTURA	0	0.00	0.00	\$68,617	0.02	0.00
YOLO	0	0.00	0.00	0	0.00	0.00
YUBA	17,363	1.03	0.00	\$5,604,046	1.24	0.00
ALL COUNTIES	1,690,199	100.00	10.82	\$452,044,070	100.00	5.60

COUNTY	VOLUME (NET MBF)	VOLUME PERCENT	PERCENT PUBLIC	VALUE	VALUE PERCENT	PERCENT PUBLIC
ALAMEDA	0	0.00	0.00	\$7,924	0.00	0.00
ALPINE	0	0.00	0.00	\$8,268	0.00	0.00
AMADOR	21,224	1.28	16.98	\$5,705,195	1.27	7.48
BUTTE	47,087	2.83	0.51	\$13,263,596	2.96	0.26
CALAVERAS	50,722	3.05	2.78	\$12,650,247	2.83	1.02
COLUSA	1,892	0.11	100.00	\$176,980	0.04	100.00
CONTRA COSTA		0.00			0.00	
DEL NORTE	23,829	1.43	0.00	\$9,113,488	2.04	0.00
EL DORADO	87,620	5.27	22.65	\$17,441,809	3.90	13.79
FRESNO	10,458	0.63	25.49	\$2,673,946	0.60	14.35
GLENN	47	0.00	0.00	\$9,870	0.00	0.00
HUMBOLDT	383,675	23.07	0.00	\$142,830,437	31.90	0.00
IMPERIAL		0.00			0.00	
INYO		0.00			0.00	
KERN		0.00			0.00	
KINGS		0.00			0.00	
LAKE	625	0.04	25.92	\$132,442	0.03	13.45
LASSEN	63,089	3.79	19.18	\$11,049,349	2.47	10.53
LOS ANGELES	0	0.00	0.00	\$9,468	0.00	0.00
MADERA	3,189	0.19	91.13	\$537,798	0.12	85.00
MARIN		0.00			0.00	
MARIPOSA	2,433	0.15	0.00	\$627,375	0.14	0.00
MENDOCINO	112,568	6.77	0.06	\$40,354,141	9.01	0.03
MERCED	0	0.00	0.00	\$6,652	0.00	0.00
MODOC	19,386	1.17	25.07	\$3,984,016	0.89	28.66
MONO	34	0.00	0.00	\$73,540	0.02	80.36
MONTEREY	0	0.00	0.00	\$3,592	0.00	0.00
NAPA	373	0.02	7.77	\$108,070	0.02	6.66
NEVADA	38,585	2.32	19.04	\$8,986,639	2.01	9.52
ORANGE	0	0.00	0.00	\$19,860	0.00	0.00
PLACER	35,075	2.11	25.84	\$6,763,721	1.51	20.18
PLUMAS	97,866	5.88	2.94	\$22,799,710	5.09	1.61
RIVERSIDE	758	0.05	0.00	\$75,866	0.02	0.00
SACRAMENTO	0	0.00	0.00	\$28,714	0.01	0.00
SAN BENITO		0.00			0.00	
SAN BERNARDINO	1,901	0.11	20.52	\$251,063	0.06	27.05
SAN DIEGO	4,860	0.29	0.00	\$167,303	0.04	0.00
SAN FRANCISCO		0.00			0.00	
SAN JOAQUIN	0	0.00	0.00	\$6,840	0.00	0.00
SAN LUIS OBISPO	0	0.00	0.00	\$7,735	0.00	0.00
SAN MATEO	5,441	0.33	0.00	\$2,582,369	0.58	0.00
SANTA BARBARA	0	0.00	0.00	\$972	0.00	0.00
SANTA CLARA	112	0.01	0.00	\$70,486	0.02	0.00
SANTA CRUZ	9,614	0.58	0.00	\$4,263,385	0.95	0.00
SHASTA	122,351	7.36	6.33	\$27,731,361	6.19	4.13
SIERRA	35,193	2.12	28.08	\$5,265,290	1.18	19.38
SISKIYOU	230,871	13.88	16.79	\$45,481,123	10.16	11.83
SOLANO	0	0.00	0.00	\$12,895	0.00	0.00
SONOMA	15,698	0.94	0.00	\$7,291,430	1.63	0.00
STANISLAUS		0.00			0.00	
SUTTER		0.00			0.00	
TEHAMA	74,207	4.46	0.00	\$17,137,043	3.83	0.00
TRINITY	90,921	5.47	0.00	\$20,587,257	4.60	0.00
TULARE	9,802	0.59	64.98	\$1,861,999	0.42	62.30
TUOLUMNE	38,001	2.29	58.77	\$7,413,613	1.66	52.38
VENTURA	0	0.00	0.00	\$61,431	0.01	0.00
YOLO		0.00			0.00	
YUBA	23,507	1.41	0.00	\$8,097,448	1.81	0.00
All counties	1,663,014	100.00	9.29	\$417,733,756	100.00	4.83

CALIFORNIA TIMBER HARVEST BY COUNTY
YEAR 2004 QUARTERS 1 TO 4

COUNTY	VOLUME			VALUE		
	(NET MBF)	% BY COUNTY	% PUBLIC		% BY COUNTY	% PUBLIC
ALAMEDA	0	0.00	0.00	\$10,478	0.00	0.00
ALPINE	0	0.00	0.00	0	0.00	0.00
AMADOR	6,962	0.41	29.45	\$1,781,980	0.36	18.27
BUTTE	52,479	3.08	1.06	\$15,031,638	3.01	1.20
CALAVERAS	50,203	2.94	4.87	\$12,966,336	2.59	4.89
COLUSA	0	0.00	0.00	0	0.00	0.00
CONTRA COSTA	127	0.01	0.00	\$38,100	0.01	0.00
DEL NORTE	28,544	1.67	0.00	\$13,118,055	2.62	0.00
EL DORADO	100,798	5.91	11.95	\$23,332,623	4.67	7.66
FRESNO	8,212	0.48	28.37	\$1,417,538	0.28	17.71
GLENN	814	0.05	0.00	\$130,800	0.03	0.00
HUMBOLDT	396,500	23.24	0.25	\$169,122,026	33.84	0.33
IMPERIAL	0	0.00	0.00	0	0.00	0.00
INYO	0	0.00	0.00	0	0.00	0.00
KERN	0	0.00	0.00	0	0.00	0.00
KINGS	0	0.00	0.00	0	0.00	0.00
LAKE	486	0.03	0.00	\$62,530	0.01	0.00
LASSEN	91,660	5.37	7.64	\$15,815,605	3.16	5.31
LOS ANGELES	0	0.00	0.00	\$11,835	0.00	0.00
MADERA	2,500	0.15	40.20	\$484,702	0.10	23.80
MARIN	0	0.00	0.00	0	0.00	0.00
MARIPOSA	2,787	0.16	0.00	\$712,114	0.14	0.00
MENDOCINO	109,548	6.42	0.00	\$40,995,090	8.20	0.00
MERCED	0	0.00	0.00	\$7,230	0.00	0.00
MODOC	34,128	2.00	1.70	\$6,106,556	1.22	1.48
MONO	0	0.00	0.00	\$44,400	0.01	100.00
MONTEREY	0	0.00	0.00	\$4,168	0.00	0.00
NAPA	97	0.01	27.84	\$27,075	0.01	28.53
NEVADA	33,363	1.96	14.70	\$8,775,069	1.75	10.42
ORANGE	0	0.00	0.00	\$29,078	0.01	0.00
PLACER	39,334	2.31	24.65	\$10,213,048	2.04	13.11
PLUMAS	123,678	7.25	10.20	\$31,273,174	6.25	5.55
RIVERSIDE	0	0.00	0.00	0	0.00	0.00
SACRAMENTO	0	0.00	0.00	\$51,867	0.01	0.00
SAN BENITO	0	0.00	0.00	0	0.00	0.00
SAN BERNARDINO	1,391	0.08	0.00	\$9,410	0.00	0.00
SAN DIEGO	0	0.00	0.00	\$10,868	0.00	0.00
SAN FRANCISCO	0	0.00	0.00	0	0.00	0.00
SAN JOAQUIN	0	0.00	0.00	\$8,271	0.00	0.00
SAN LUIS OBISPO	0	0.00	0.00	\$11,803	0.00	0.00
SAN MATEO	3,799	0.22	0.00	\$1,802,958	0.36	0.00
SANTA BARBARA	0	0.00	0.00	0	0.00	0.00
SANTA CLARA	67	0.00	0.00	\$71,226	0.01	0.00
SANTA CRUZ	11,089	0.65	0.00	\$5,811,351	1.16	0.00
SHASTA	135,723	7.96	4.53	\$29,827,785	5.96	2.72
SIERRA	27,225	1.60	30.55	\$5,308,752	1.06	21.22
SISKIYOU	239,349	14.03	10.17	\$51,565,369	10.31	6.45
SOLANO	0	0.00	0.00	\$18,351	0.00	0.00
SONOMA	14,136	0.83	0.00	\$5,749,075	1.15	0.00
STANISLAUS	0	0.00	0.00	0	0.00	0.00
SUTTER	0	0.00	0.00	0	0.00	0.00
TEHAMA	28,612	1.68	0.00	\$7,782,617	1.56	0.00
TRINITY	94,885	5.56	0.52	\$23,268,890	4.65	0.29
TULARE	16,339	0.96	77.99	\$2,169,305	0.43	74.96
TUOLUMNE	23,570	1.38	20.35	\$5,038,494	1.01	15.74
VENTURA	0	0.00	0.00	\$70,845	0.01	0.00
YOLO	0	0.00	0.00	0	0.00	0.00
YUBA	27,495	1.61	0.00	\$10,037,487	2.01	0.00
ALL COUNTIES	1,705,900	Page 45 of 56	GDRCo GPLB RDRB Comments 2		100.00	3.31

CALIFORNIA TIMBER HARVEST BY COUNTY
YEAR 2005 QUARTER 1 TO 4

COUNTY	VOLUME (NET MBF)	VOLUME %	% PUBLIC VOLUME	VALUE	VALUE %	% PUBLIC VALUE
ALAMEDA	0	0.00	0.00	\$2,362	0.00	0.00
ALPINE	20	0.00	0.00	\$20	0.00	0.00
AMADOR	87,852	5.09	56.13	\$14,771,428	2.70	42.13
BUTTE	29,936	1.74	21.85	\$7,661,754	1.40	13.66
CALAVERAS	15,677	0.91	21.27	\$3,864,452	0.71	14.36
COLUSA	0	0.00	0.00	\$0	0.00	0.00
CONTRA COSTA	0	0.00	0.00	\$0	0.00	0.00
DEL NORTE	22,557	1.31	0.00	\$11,185,640	2.05	0.00
EL DORADO	90,019	5.22	39.83	\$16,797,841	3.07	26.08
FRESNO	11,525	0.67	20.80	\$2,344,847	0.43	9.93
GLENN	3,112	0.18	0.80	\$475,830	0.09	0.94
HUMBOLDT	390,333	22.63	1.75	\$193,362,618	35.35	1.10
IMPERIAL	0	0.00	0.00	\$0	0.00	0.00
INYO	0	0.00	0.00	\$0	0.00	0.00
KERN	1,592	0.09	87.50	\$163,260	0.03	78.42
KINGS	0	0.00	0.00	\$0	0.00	0.00
LAKE	100	0.01	100.00	\$29,520	0.01	100.00
LASSEN	67,910	3.94	21.81	\$15,298,825	2.80	15.86
LOS ANGELES	455	0.03	0.00	\$81,908	0.01	0.00
MADERA	3,038	0.18	98.45	\$486,120	0.09	98.07
MARIN	0	0.00	0.00	\$0	0.00	0.00
MARIPOSA	5,796	0.34	16.53	\$1,249,837	0.23	12.26
MENDOCINO	120,841	7.01	0.00	\$53,913,803	9.86	0.00
MERCED	0	0.00	0.00	\$6,562	0.00	0.00
MODOC	43,087	2.50	3.66	\$8,480,072	1.55	5.58
MONO	0	0.00	0.00	\$27,810	0.01	68.50
MONTEREY	0	0.00	0.00	\$4,326	0.00	0.00
NAPA	1,130	0.07	4.69	\$414,539	0.08	4.08
NEVADA	36,391	2.11	2.28	\$8,807,781	1.61	2.22
ORANGE	0	0.00	0.00	\$29,694	0.01	0.00
PLACER	46,025	2.67	25.07	\$11,513,849	2.11	15.48
PLUMAS	107,817	6.25	15.41	\$26,386,696	4.82	10.17
RIVERSIDE	0	0.00	0.00	\$8,904	0.00	0.00
SACRAMENTO	0	0.00	0.00	\$45,684	0.01	0.00
SAN BENITO	0	0.00	0.00	\$0	0.00	0.00
SAN BERNARDINO	604	0.04	0.00	\$604	0.00	0.00
SAN DIEGO	0	0.00	0.00	\$7,944	0.00	0.00
SAN FRANCISCO	0	0.00	0.00	\$0	0.00	0.00
SAN JOAQUIN	0	0.00	0.00	\$9,297	0.00	0.00
SAN LUIS OBISPO	0	0.00	0.00	\$13,798	0.00	0.00
SAN MATEO	5,721	0.33	0.63	\$3,659,186	0.67	0.13
SANTA BARBARA	0	0.00	0.00	\$0	0.00	0.00
SANTA CLARA	2,705	0.16	0.00	\$1,752,842	0.32	0.00
SANTA CRUZ	9,674	0.56	0.00	\$6,158,287	1.13	0.00
SHASTA	170,690	9.89	5.34	\$43,469,158	7.95	4.64
SIERRA	27,120	1.57	18.52	\$6,378,607	1.17	12.44
SISKIYOU	207,726	12.04	19.31	\$47,567,015	8.70	15.86
SOLANO	0	0.00	0.00	\$18,000	0.00	0.00
SONOMA	8,953	0.52	0.00	\$4,984,256	0.91	0.00
STANISLAUS	0	0.00	0.00	\$0	0.00	0.00
SUTTER	0	0.00	0.00	\$0	0.00	0.00
TEHAMA	65,095	3.77	4.67	\$18,071,990	3.30	2.96
TRINITY	81,607	4.73	0.72	\$21,730,126	3.97	0.69
TULARE	10,703	0.62	79.54	\$1,879,674	0.34	78.58
TUOLUMNE	37,379	2.17	19.31	\$9,543,985	1.74	13.32
VENTURA	0	0.00	0.00	\$61,514	0.01	0.00
YOLO	0	0.00	0.00	\$0	0.00	0.00
YUBA	11,834	0.69	6.40	\$4,214,745	0.77	6.07
ALL COUNTIES	1,725,024	100	13.30	\$546,937,010	100	6.76

COUNTY	VOLUME (NET MBF)	VOLUME PERCENT	PERCENT PUBLIC	VALUE	VALUE PERCENT	PERCENT PUBLIC
ALAMEDA	0	0.00	0.00	\$ 9,627	0.00	0.00
ALPINE	51	0.00	0.00	\$ 2,780	0.00	0.00
AMADOR	27,274	1.67	76.59	\$ 2,800,259	0.52	51.89
BUTTE	62,797	3.85	9.26	\$ 19,652,996	3.68	4.91
CALAVERAS	33,523	2.06	3.36	\$ 8,834,814	1.65	1.78
COLUSA	0	0.00	0.00	\$ -	0.00	0.00
CONTRA COSTA	0	0.00	0.00	\$ 9,975	0.00	0.00
DEL NORTE	16,809	1.03	11.31	\$ 7,447,657	1.39	4.16
EL DORADO	99,508	6.10	24.94	\$ 22,846,630	4.28	11.95
FRESNO	10,345	0.63	51.51	\$ 2,046,265	0.38	41.28
GLENN	0	0.00	0.00	\$ -	0.00	0.00
HUMBOLDT	336,743	20.64	1.70	\$ 171,627,827	32.16	0.50
IMPERIAL	0	0.00	0.00	\$ -	0.00	0.00
INYO	0	0.00	0.00	\$ -	0.00	0.00
KERN	1,016	0.06	93.80	\$ 59,471	0.01	92.43
KINGS	0	0.00	0.00	\$ -	0.00	0.00
LAKE	928	0.06	3.99	\$ 339,069	0.06	1.17
LASSEN	60,307	3.70	24.10	\$ 13,336,082	2.50	16.36
LOS ANGELES	0	0.00	0.00	\$ -	0.00	0.00
MADERA	2,361	0.14	76.41	\$ 402,060	0.08	69.43
MARIN	0	0.00	0.00	\$ -	0.00	0.00
MARIPOSA	4,798	0.29	36.43	\$ 1,152,325	0.22	22.75
MENDOCINO	110,168	6.75	0.00	\$ 53,378,734	9.99	0.00
MERCED	0	0.00	0.00	\$ 6,300	0.00	0.00
MODOC	24,991	1.53	1.24	\$ 5,393,523	1.01	1.12
MONO	0	0.00	0.00	\$ 24,600	0.00	60.37
MONTEREY	0	0.00	0.00	\$ -	0.00	0.00
NAPA	82	0.01	58.54	\$ 26,717	0.01	53.00
NEVADA	27,824	1.71	15.05	\$ 7,321,637	1.37	12.31
ORANGE	0	0.00	0.00	\$ 25,882	0.00	0.00
PLACER	49,281	3.02	27.36	\$ 11,583,044	2.17	20.34
PLUMAS	118,936	7.29	21.78	\$ 28,812,494	5.39	13.97
RIVERSIDE	0	0.00	0.00	\$ 6,750	0.00	0.00
SACRAMENTO	0	0.00	0.00	\$ 34,281	0.01	0.00
SAN BENITO	0	0.00	0.00	\$ -	0.00	0.00
SAN BERNARDINO	0	0.00	0.00	\$ -	0.00	0.00
SAN DIEGO	0	0.00	0.00	\$ 9,108	0.00	0.00
SAN FRANCISCO	0	0.00	0.00	\$ -	0.00	0.00
SAN JOAQUIN	0	0.00	0.00	\$ 7,623	0.00	0.00
SAN LUIS OBISPO	0	0.00	0.00	\$ 10,710	0.00	0.00
SAN MATEO	5,731	0.35	0.00	\$ 4,044,658	0.76	0.00
SANTA BARBARA	0	0.00	0.00	\$ -	0.00	0.00
SANTA CLARA	1,983	0.12	0.00	\$ 1,229,981	0.23	0.00
SANTA CRUZ	9,600	0.59	0.00	\$ 6,339,356	1.19	0.00
SHASTA	189,501	11.62	2.01	\$ 50,460,525	9.45	1.13
SIERRA	22,041	1.35	12.19	\$ 5,241,549	0.98	10.90
SISKIYOU	198,832	12.19	20.99	\$ 47,924,733	8.97	20.28
SOLANO	0	0.00	0.00	\$ -	0.00	0.00
SONOMA	11,196	0.69	0.00	\$ 6,323,938	1.18	0.00
STANISLAUS	0	0.00	0.00	\$ -	0.00	0.00
SUTTER	0	0.00	0.00	\$ -	0.00	0.00
TEHAMA	51,179	3.14	0.00	\$ 14,847,860	2.78	0.00
TRINITY	84,998	5.21	11.10	\$ 22,926,002	4.29	9.78
TULARE	5,849	0.36	87.72	\$ 1,219,013	0.23	92.23
TUOLUMNE	48,392	2.97	15.02	\$ 11,484,126	2.15	10.52
VENTURA	0	0.00	0.00	\$ 16,258	0.00	0.00
YOLO	0	0.00	0.00	\$ -	0.00	0.00
YUBA	14,156	0.87	12.73	\$ 4,837,142	0.91	12.00
ALL COUNTIES	1,631,200	100.00	12.29	\$ 534,104,381	100.00	6.26

COUNTY	VOLUME (NET MBF)	VOLUME PERCENT	PERCENT PUBLIC	VALUE	VALUE PERCENT	PERCENT PUBLIC
ALAMEDA	0	0.00	0.00	\$10,725	0.00	0.00
ALPINE	0	0.00	0.00	\$0	0.00	0.00
AMADOR	18,297	1.13	19.18	\$4,642,074	0.98	18.42
BUTTE	65,964	4.06	2.25	\$16,550,040	3.49	1.37
CALAVERAS	27,138	1.67	0.00	\$4,907,155	1.03	0.00
COLUSA	0	0.00	0.00	\$0	0.00	0.00
CONTRA COSTA	0	0.00	0.00	\$7,020	0.00	0.00
DEL NORTE	11,948	0.73	0.00	\$5,671,161	1.20	0.00
EL DORADO	91,055	5.60	21.58	\$18,521,478	3.90	14.53
FRESNO	13,142	0.81	39.32	\$2,735,138	0.58	28.44
GLENN	2,086	0.13	0.00	\$379,900	0.08	0.00
HUMBOLDT	296,840	18.25	0.08	\$147,113,659	31.03	0.12
IMPERIAL	0	0.00	0.00	\$0	0.00	0.00
INYO	0	0.00	0.00	\$0	0.00	0.00
KERN	2,584	0.16	0.00	\$482,245	0.10	0.00
KINGS	0	0.00	0.00	\$0	0.00	0.00
LAKE	3,684	0.23	3.53	\$802,721	0.17	2.11
LASSEN	29,139	1.79	9.44	\$5,468,490	1.15	6.66
LOS ANGELES	0	0.00	0.00	\$0	0.00	0.00
MADERA	7,074	0.44	94.87	\$987,350	0.21	90.53
MARIN	0	0.00	0.00	\$0	0.00	0.00
MARIPOSA	5,264	0.32	67.74	\$921,922	0.19	52.30
MENDOCINO	103,031	6.34	1.14	\$43,647,855	9.20	0.35
MERCED	0	0.00	0.00	\$6,750	0.00	0.00
MODOC	35,110	2.16	9.93	\$5,329,280	1.12	11.87
MONO	9	0.00	100.00	\$38,310	0.01	100.00
MONTEREY	0	0.00	0.00	\$3,435	0.00	0.00
NAPA	126	0.01	0.00	\$16,650	0.00	0.00
NEVADA	30,473	1.87	7.61	\$6,743,706	1.42	8.46
ORANGE	0	0.00	0.00	\$24,597	0.01	0.00
PLACER	35,247	2.17	32.42	\$7,347,598	1.55	22.48
PLUMAS	136,521	8.40	10.92	\$28,070,293	5.92	9.08
RIVERSIDE	0	0.00	0.00	\$0	0.00	0.00
SACRAMENTO	0	0.00	0.00	\$26,802	0.01	0.00
SAN BENITO	0	0.00	0.00	\$0	0.00	0.00
SAN BERNARDINO	0	0.00	0.00	\$0	0.00	0.00
SAN DIEGO	0	0.00	0.00	\$9,405	0.00	0.00
SAN FRANCISCO	0	0.00	0.00	\$0	0.00	0.00
SAN JOAQUIN	0	0.00	0.00	\$6,345	0.00	0.00
SAN LUIS OBISPO	0	0.00	0.00	\$12,190	0.00	0.00
SAN MATEO	5,806	0.36	0.00	\$4,117,785	0.87	0.00
SANTA BARBARA	0	0.00	0.00	\$0	0.00	0.00
SANTA CLARA	558	0.03	0.00	\$443,821	0.09	0.00
SANTA CRUZ	9,414	0.58	0.00	\$6,413,428	1.35	0.00
SHASTA	191,818	11.78	1.45	\$43,948,866	9.26	0.82
SIERRA	50,105	3.08	32.00	\$9,437,066	1.99	30.40
SISKIYOU	246,141	15.14	23.41	\$59,343,592	12.51	19.18
SOLANO	0	0.00	0.00	\$16,258	0.00	0.00
SONOMA	10,646	0.65	0.00	\$5,497,566	1.16	0.00
STANISLAUS	0	0.00	0.00	\$0	0.00	0.00
SUTTER	0	0.00	0.00	\$0	0.00	0.00
TEHAMA	46,531	2.86	0.00	\$12,975,879	2.74	0.00
TRINITY	81,988	5.04	18.72	\$17,142,845	3.61	14.92
TULARE	1,743	0.11	65.12	\$295,552	0.06	60.08
TUOLUMNE	50,558	3.11	33.95	\$9,249,302	1.95	24.61
VENTURA	0	0.00	0.00	\$17,104	0.00	0.00
YOLO	0	0.00	0.00	\$0	0.00	0.00
YUBA	16,278	1.00	0.15	\$5,014,250	1.06	0.09
ALL COUNTIES	1,626,118	100.00	11.47	\$474,397,608	100.00	6.68

COUNTY	VOLUME (NET MBF)	VOLUME PERCENT	PERCENT PUBLIC	VALUE	VALUE PERCENT	PERCENT PUBLIC
ALAMEDA	0	0.00	0.00	\$10,170	0.00	0.00
ALPINE	0	0.00	0.00	\$0	0.00	0.00
AMADOR	24626	1.79	28.27	\$3,285,001	1.02	22.12
BUTTE	92484	6.74	0.20	\$15,998,229	4.95	0.18
CALAVERAS	33235	2.42	1.01	\$4,720,135	1.46	0.88
COLUSA	0	0.00	0.00	\$0	0.00	0.00
CONTRA COSTA	0	0.00	0.00	\$5,724	0.00	0.00
DEL NORTE	12572	0.92	0.00	\$5,164,941	1.60	0.00
EL DORADO	44726	3.26	12.91	\$5,963,675	1.84	11.13
FRESNO	7248	0.53	33.25	\$898,194	0.28	15.16
GLENN	1173	0.09	100.00	\$147,215	0.05	100.00
HUMBOLDT	227339	16.59	0.07	\$104,797,337	32.43	0.07
IMPERIAL	0	0.00	0.00	\$0	0.00	0.00
INYO	0	0.00	0.00	\$0	0.00	0.00
KERN	2092	0.15	0.00	\$238,657	0.07	0.00
KINGS	0	0.00	0.00	\$0	0.00	0.00
LAKE	0	0.00	0.00	\$0	0.00	0.00
LASSEN	35450	2.58	21.57	\$4,596,595	1.42	19.02
LOS ANGELES	0	0.00	0.00	\$0	0.00	0.00
MADERA	621	0.05	95.01	\$85,962	0.03	76.10
MARIN	0	0.00	0.00	\$0	0.00	0.00
MARIPOSA	2471	0.18	0.00	\$459,210	0.14	0.00
MENDOCINO	92652	6.75	0.42	\$39,209,408	12.13	0.15
MERCED	0	0.00	0.00	\$6,300	0.00	0.00
MODOC	15709	1.14	4.91	\$1,870,755	0.58	4.32
MONO	0	0.00	0.00	\$24,110	0.01	100.00
MONTEREY	0	0.00	0.00	\$3,314	0.00	0.00
NAPA	0	0.00	0.00	\$14,121	0.00	0.00
NEVADA	31122	2.27	19.72	\$5,679,127	1.76	17.91
ORANGE	0	0.00	0.00	\$24,597	0.01	0.00
PLACER	23129	1.69	29.11	\$3,719,334	1.15	20.90
PLUMAS	146094	10.65	9.64	\$22,297,325	6.90	11.25
RIVERSIDE	0	0.00	0.00	\$0	0.00	0.00
SACRAMENTO	0	0.00	0.00	\$28,440	0.01	0.00
SAN BENITO	0	0.00	0.00	\$0	0.00	0.00
SAN BERNARDINO	0	0.00	0.00	\$0	0.00	0.00
SAN DIEGO	0	0.00	0.00	\$8,647	0.00	0.00
SAN FRANCISCO	0	0.00	0.00	\$0	0.00	0.00
SAN JOAQUIN	0	0.00	0.00	\$4,239	0.00	0.00
SAN LUIS OBISPO	0	0.00	0.00	\$9,570	0.00	0.00
SAN MATEO	2742	0.20	0.00	\$1,801,217	0.56	0.00
SANTA BARBARA	0	0.00	0.00	\$0	0.00	0.00
SANTA CLARA	847	0.06	0.00	\$517,826	0.16	0.00
SANTA CRUZ	12715	0.93	0.00	\$7,925,336	2.45	0.00
SHASTA	216661	15.79	0.30	\$33,600,995	10.39	0.20
SIERRA	9790	0.71	4.87	\$1,012,773	0.31	3.87
SISKIYOU	147278	10.73	15.71	\$27,042,757	8.36	12.10
SOLANO	0	0.00	0.00	\$12,645	0.00	0.00
SONOMA	11835	0.86	0.00	\$6,806,279	2.11	0.00
STANISLAUS	0	0.00	0.00	\$0	0.00	0.00
SUTTER	0	0.00	0.00	\$0	0.00	0.00
TEHAMA	63877	4.66	0.00	\$9,853,814	3.05	0.00
TRINITY	50968	3.71	3.61	\$7,151,987	2.21	3.11
TULARE	1028	0.07	15.95	\$67,767	0.02	22.93
TUOLUMNE	52975	3.86	36.93	\$5,705,404	1.76	39.76
VENTURA	0	0.00	0.00	\$9,691	0.00	0.00
YOLO	0	0.00	0.00	\$0	0.00	0.00
YUBA	8565	0.62	0.58	\$2,514,107	0.78	0.24
ALL COUNTIES	1,372,024	100.00	7.23	\$323,292,930	100.00	4.05

YTHR2

YEAR 2009 QUARTER 1 TO 4

TIMBER TAX SECTION

COUNTY	VOLUME (NET MBF)	VOLUME PERCENT	PERCENT PUBLIC	VALUE	VALUE PERCENT	PERCENT PUBLIC
ALAMEDA	0	0.00	0.00	\$10,545	0.01	0.00
ALPINE	0	0.00	0.00	\$0	0.00	0.00
AMADOR	5,927	0.74	0.00	\$438,921	0.44	0.00
BUTTE	70,688	8.78	0.00	\$4,428,550	4.46	0.00
CALAVERAS	16,162	2.01	0.00	\$2,474,230	2.49	0.00
COLUSA	0	0.00	0.00	\$0	0.00	0.00
CONTRA COSTA	0	0.00	0.00	\$7,245	0.01	0.00
DEL NORTE	4,298	0.53	0.00	\$1,262,453	1.27	0.00
EL DORADO	20,181	2.51	0.36	\$1,775,776	1.79	0.31
FRESNO	5,418	0.67	33.26	\$202,633	0.20	26.13
GLENN	0	0.00	0.00	\$0	0.00	0.00
HUMBOLDT	110,197	13.69	0.27	\$27,494,550	27.70	0.11
IMPERIAL	0	0.00	0.00	\$0	0.00	0.00
INYO	0	0.00	0.00	\$0	0.00	0.00
KERN	1,096	0.14	50.36	\$141,605	0.14	0.88
KINGS	0	0.00	0.00	\$0	0.00	0.00
LAKE	0	0.00	0.00	\$0	0.00	0.00
LASSEN	31,015	3.85	20.25	\$1,898,056	1.91	18.76
LOS ANGELES	0	0.00	0.00	\$0	0.00	0.00
MADERA	278	0.03	100.00	\$35,898	0.04	49.86
MARIN	0	0.00	0.00	\$0	0.00	0.00
MARIPOSA	2,229	0.26	0.00	\$648,465	0.65	0.00
MENDOCINO	43,801	5.44	0.00	\$12,315,524	12.41	0.00
MERCED	0	0.00	0.00	\$6,195	0.01	0.00
MODOC	10,611	1.32	6.85	\$764,500	0.77	5.58
MONO	13	0.00	100.00	\$11,458	0.01	100.00
MONTEREY	0	0.00	0.00	\$3,610	0.00	0.00
NAPA	0	0.00	0.00	\$0	0.00	0.00
NEVADA	24,028	2.98	5.15	\$2,688,966	2.71	1.90
ORANGE	0	0.00	0.00	\$23,166	0.02	0.00
PLACER	11,092	1.38	15.94	\$782,451	0.79	15.40
PLUMAS	63,742	7.92	29.11	\$4,070,982	4.10	35.51
RIVERSIDE	0	0.00	0.00	\$0	0.00	0.00
SACRAMENTO	0	0.00	0.00	\$24,534	0.02	0.00
SAN BENITO	0	0.00	0.00	\$0	0.00	0.00
SAN BERNARDINO	0	0.00	0.00	\$0	0.00	0.00
SAN DIEGO	0	0.00	0.00	\$7,474	0.01	0.00
SAN FRANCISCO	0	0.00	0.00	\$0	0.00	0.00
SAN JOAQUIN	0	0.00	0.00	\$3,204	0.00	0.00
SAN LUIS OBISPO	0	0.00	0.00	\$7,407	0.01	0.00
SAN MATEO	1,715	0.21	0.00	\$761,201	0.77	0.00
SANTA BARBARA	0	0.00	0.00	\$0	0.00	0.00
SANTA CLARA	1,083	0.13	0.00	\$578,574	0.58	0.00
SANTA CRUZ	8,404	1.04	0.00	\$3,529,244	3.56	0.00
SHASTA	100,061	12.43	4.07	\$7,031,927	7.09	3.13
SIERRA	8,632	1.07	5.75	\$606,926	0.61	12.79
SISKIYOU	118,512	14.72	7.77	\$11,648,293	11.74	4.66
SOLANO	0	0.00	0.00	\$14,191	0.01	0.00
SONOMA	1,228	0.15	0.00	\$512,219	0.52	0.00
STANISLAUS	0	0.00	0.00	\$0	0.00	0.00
SUTTER	0	0.00	0.00	\$0	0.00	0.00
TEHAMA	55,137	6.85	0.00	\$5,366,637	5.41	0.00
TRINITY	48,154	5.98	13.05	\$3,125,180	3.15	11.65
TULARE	1,891	0.23	24.11	\$93,391	0.09	0.49
TUOLUMNE	26,976	3.35	27.53	\$1,836,441	1.85	20.55
VENTURA	0	0.00	0.00	\$8,851	0.01	0.00
YOLO	0	0.00	0.00	\$0	0.00	0.00
YUBA	12,371	1.54	0.00	\$2,605,609	2.63	0.00
ALL COUNTIES	804,940	100.00	7.40	\$99,247,082	100.00	3.75

YTHR2

YEAR 2010 QUARTER 1 TO 4

TIMBER TAX SECTION

COUNTY	VOLUME (NET MBF)	VOLUME PERCENT	PERCENT PUBLIC	VALUE	VALUE PERCENT	PERCENT PUBLIC
ALAMEDA	0	0.00	0.00	\$16,065	0.01	0.00
ALPINE	2,192	0.19	98.63	\$123,540	0.06	99.98
AMADOR	7,718	0.67	0.00	\$719,056	0.36	0.00
BUTTE	31,739	2.73	0.00	\$4,740,984	2.38	0.00
CALAVERAS	25,679	2.21	24.88	\$1,829,586	0.92	26.51
COLUSA	0	0.00	0.00	\$0	0.00	0.00
CONTRA COSTA	0	0.00	0.00	\$8,145	0.00	0.00
DEL NORTE	6,680	0.58	0.00	\$2,441,264	1.22	0.00
EL DORADO	19,832	1.71	21.38	\$1,201,507	0.60	17.93
FRESNO	7,314	0.63	28.27	\$299,752	0.15	19.64
GLENN	0	0.00	0.00	\$0	0.00	0.00
HUMBOLDT	218,651	18.84	0.00	\$68,038,992	34.10	0.00
IMPERIAL	0	0.00	0.00	\$0	0.00	0.00
INYO	0	0.00	0.00	\$6,015	0.00	100.00
KERN	1,543	0.13	100.00	\$32,088	0.02	100.00
KINGS	0	0.00	0.00	\$0	0.00	0.00
LAKE	3,552	0.31	68.83	\$207,730	0.10	71.87
LASSEN	47,418	4.09	10.06	\$4,686,859	2.35	7.27
LOS ANGELES	0	0.00	0.00	\$0	0.00	0.00
MADERA	3,553	0.31	99.41	\$255,499	0.13	99.69
MARIN	0	0.00	0.00	\$0	0.00	0.00
MARIPOSA	5,113	0.44	70.17	\$420,750	0.21	59.97
MENDOCINO	94,724	8.16	0.00	\$29,256,218	14.66	0.00
MERCED	0	0.00	0.00	\$6,300	0.00	0.00
MODOC	18,496	1.59	19.99	\$2,293,345	1.15	26.38
MONO	0	0.00	0.00	\$7,222	0.00	53.79
MONTEREY	0	0.00	0.00	\$3,604	0.00	0.00
NAPA	0	0.00	0.00	\$0	0.00	0.00
NEVADA	12,187	1.05	15.58	\$1,041,564	0.52	9.84
ORANGE	0	0.00	0.00	\$24,862	0.01	0.00
PLACER	42,071	3.62	19.84	\$4,603,208	2.31	10.54
PLUMAS	88,996	7.67	41.90	\$10,059,301	5.04	38.70
RIVERSIDE	0	0.00	0.00	\$0	0.00	0.00
SACRAMENTO	0	0.00	0.00	\$19,845	0.01	0.00
SAN BENITO	0	0.00	0.00	\$0	0.00	0.00
SAN BERNARDINO	0	0.00	0.00	\$0	0.00	0.00
SAN DIEGO	0	0.00	0.00	\$8,527	0.00	0.00
SAN FRANCISCO	0	0.00	0.00	\$0	0.00	0.00
SAN JOAQUIN	0	0.00	0.00	\$2,106	0.00	0.00
SAN LUIS OBISPO	0	0.00	0.00	\$7,317	0.00	0.00
SAN MATEO	4,706	0.41	0.00	\$2,290,818	1.15	0.00
SANTA BARBARA	0	0.00	0.00	\$0	0.00	0.00
SANTA CLARA	1,062	0.09	0.00	\$531,700	0.27	0.00
SANTA CRUZ	13,359	1.15	0.00	\$4,776,316	2.39	0.00
SHASTA	151,116	13.02	4.01	\$16,665,093	8.35	2.22
SIERRA	20,755	1.79	44.01	\$2,180,334	1.09	33.54
SISKIYOU	188,750	16.26	11.08	\$22,975,800	11.52	5.95
SOLANO	0	0.00	0.00	\$14,925	0.01	0.00
SONOMA	8,902	0.77	0.00	\$4,020,231	2.02	0.00
STANISLAUS	0	0.00	0.00	\$0	0.00	0.00
SUTTER	0	0.00	0.00	\$0	0.00	0.00
TEHAMA	53,934	4.65	0.00	\$5,783,878	2.90	0.00
TRINITY	36,363	3.13	0.82	\$3,732,831	1.87	0.29
TULARE	1,741	0.15	71.80	\$68,691	0.03	74.48
TUOLUMNE	23,596	2.03	50.35	\$1,154,992	0.58	45.90
VENTURA	0	0.00	0.00	\$13,870	0.01	0.00
YOLO	0	0.00	0.00	\$0	0.00	0.00
YUBA	18,846	1.62	25.50	\$2,934,172	1.47	24.03
ALL COUNTIES	1,180,588	100.00	11.74	\$199,504,902	100.00	5.40

YTHR2

YEAR 2011 QUARTER 1 TO 4

TIMBER TAX SECTION

COUNTY	VOLUME (NET MBF)	VOLUME PERCENT	PERCENT PUBLIC	VALUE	VALUE PERCENT	PERCENT PUBLIC
ALAMEDA	0	0.00	0.00	\$15,525	0.01	0.00
ALPINE	0	0.00	0.00	\$0	0.00	0.00
AMADOR	9,979	0.77	17.96	\$1,267,250	0.47	12.73
BUTTE	42,617	3.31	1.48	\$9,458,911	3.47	0.79
CALAVERAS	33,661	2.61	4.05	\$4,144,867	1.52	5.78
COLUSA	1,743	0.14	100.00	\$156,875	0.06	100.00
CONTRA COSTA	0	0.00	0.00	\$6,225	0.00	0.00
DEL NORTE	9,456	0.73	0.00	\$2,789,092	1.02	0.00
EL DORADO	40,467	3.14	14.64	\$4,750,723	1.74	10.07
FRESNO	17,780	1.38	74.55	\$1,447,349	0.53	70.24
GLENN	372	0.03	100.00	\$66,460	0.02	100.00
HUMBOLDT	216,272	16.79	0.00	\$65,778,020	24.14	0.00
IMPERIAL	0	0.00	0.00	\$0	0.00	0.00
INYO	0	0.00	0.00	\$0	0.00	0.00
KERN	3,871	0.30	37.74	\$175,923	0.06	41.38
KINGS	0	0.00	0.00	\$0	0.00	0.00
LAKE	362	0.03	0.00	\$45,915	0.02	0.00
LASSEN	78,977	6.13	10.21	\$12,172,740	4.47	6.69
LOS ANGELES	0	0.00	0.00	\$0	0.00	0.00
MADERA	3,839	0.30	98.93	\$281,850	0.10	99.25
MARIN	0	0.00	0.00	\$0	0.00	0.00
MARIPOSA	4,563	0.35	4.71	\$561,801	0.21	3.03
MENDOCINO	89,795	6.97	0.00	\$25,761,584	9.45	0.00
MERCED	0	0.00	0.00	\$8,400	0.00	0.00
MODOC	24,057	1.87	6.83	\$4,550,640	1.67	3.25
MONO	30	0.00	100.00	\$17,310	0.01	100.00
MONTEREY	0	0.00	0.00	\$4,387	0.00	0.00
NAPA	0	0.00	0.00	\$0	0.00	0.00
NEVADA	16,147	1.25	8.41	\$3,248,939	1.19	5.68
ORANGE	0	0.00	0.00	\$25,653	0.01	0.00
PLACER	28,703	2.23	35.37	\$5,254,369	1.93	26.47
PLUMAS	74,370	5.77	27.84	\$11,510,226	4.22	13.03
RIVERSIDE	0	0.00	0.00	\$0	0.00	0.00
SACRAMENTO	0	0.00	0.00	\$34,632	0.01	0.00
SAN BENITO	0	0.00	0.00	\$0	0.00	0.00
SAN BERNARDINO	0	0.00	0.00	\$0	0.00	0.00
SAN DIEGO	0	0.00	0.00	\$9,254	0.00	0.00
SAN FRANCISCO	0	0.00	0.00	\$0	0.00	0.00
SAN JOAQUIN	0	0.00	0.00	\$135	0.00	0.00
SAN LUIS OBISPO	0	0.00	0.00	\$8,109	0.00	0.00
SAN MATEO	6,060	0.47	0.00	\$2,709,322	0.99	0.00
SANTA BARBARA	0	0.00	0.00	\$0	0.00	0.00
SANTA CLARA	556	0.04	0.00	\$300,384	0.11	0.00
SANTA CRUZ	7,731	0.60	0.00	\$2,644,572	1.04	0.00
SHASTA	186,833	14.50	6.00	\$40,381,470	14.82	2.78
SIERRA	22,044	1.71	41.09	\$3,840,151	1.41	27.91
SISKIYOU	194,564	15.10	25.22	\$39,211,863	14.39	21.13
SOLANO	0	0.00	0.00	\$15,912	0.01	0.00
SONOMA	6,542	0.51	0.00	\$1,728,445	0.63	0.00
STANISLAUS	0	0.00	0.00	\$0	0.00	0.00
SUTTER	0	0.00	0.00	\$0	0.00	0.00
TEHAMA	56,885	4.42	2.38	\$10,634,572	3.90	1.15
TRINITY	40,316	3.13	11.84	\$5,588,772	2.05	10.28
TULARE	1,497	0.12	0.00	\$132,200	0.05	0.00
TUOLUMNE	44,164	3.43	13.84	\$6,518,225	2.39	13.07
VENTURA	0	0.00	0.00	\$13,356	0.00	0.00
YOLO	0	0.00	0.00	\$0	0.00	0.00
YUBA	24,072	1.87	14.76	\$5,017,453	1.84	16.62
ALL COUNTIES	1,286,325	100.00	12.24	\$272,469,881	100.00	7.15

YTHR2

YEAR 2012 QUARTER 1 TO 4

TIMBER TAX SECTION

COUNTY	VOLUME (NET MBF)	VOLUME PERCENT	PERCENT PUBLIC	VALUE	VALUE PERCENT	PERCENT PUBLIC
ALAMEDA	0	0.00	0.00	\$0	0.00	0.00
ALPINE	0	0.00	0.00	\$0	0.00	0.00
AMADOR	10,594	0.81	9.35	\$2,121,645	0.79	4.20
BUTTE	45,198	3.46	4.54	\$9,573,425	3.58	1.93
CALAVERAS	39,458	3.02	7.67	\$6,755,461	2.53	6.55
COLUSA	0	0.00	0.00	\$0	0.00	0.00
CONTRA COSTA	0	0.00	0.00	\$0	0.00	0.00
DEL NORTE	5,203	0.40	0.00	\$1,290,905	0.48	0.00
EL DORADO	48,547	3.71	24.10	\$7,075,521	2.65	18.09
FRESNO	13,129	1.00	56.40	\$1,271,349	0.48	46.81
GLENN	4,520	0.35	100.00	\$765,057	0.29	100.00
HUMBOLDT	221,617	16.95	1.50	\$62,557,351	23.39	1.10
IMPERIAL	0	0.00	0.00	\$0	0.00	0.00
INYO	0	0.00	0.00	\$0	0.00	0.00
KERN	3,943	0.30	49.71	\$375,045	0.14	57.46
KINGS	0	0.00	0.00	\$0	0.00	0.00
LAKE	56	0.00	46.43	\$7,900	0.00	41.14
LASSEN	74,433	5.69	18.06	\$12,997,465	4.86	13.44
LOS ANGELES	0	0.00	0.00	\$0	0.00	0.00
MADERA	9,900	0.76	89.91	\$810,301	0.30	88.90
MARIN	0	0.00	0.00	\$0	0.00	0.00
MARIPOSA	3,031	0.23	0.00	\$370,270	0.14	0.00
MENDOCINO	121,850	9.32	0.00	\$28,940,454	10.82	0.00
MERCED	0	0.00	0.00	\$8,295	0.00	0.00
MODOC	40,006	3.06	21.94	\$4,568,740	1.71	20.81
MONO	2,349	0.18	100.00	\$201,590	0.08	98.72
MONTEREY	0	0.00	0.00	\$3,003	0.00	0.00
NAPA	0	0.00	0.00	\$0	0.00	0.00
NEVADA	14,531	1.11	3.72	\$2,647,665	0.99	3.60
ORANGE	0	0.00	0.00	\$25,804	0.01	0.00
PLACER	20,951	1.60	43.88	\$3,300,234	1.23	28.76
PLUMAS	84,652	6.48	14.81	\$13,689,163	5.11	13.58
RIVERSIDE	0	0.00	0.00	\$0	0.00	0.00
SACRAMENTO	0	0.00	0.00	\$40,374	0.01	0.00
SAN BENITO	0	0.00	0.00	\$0	0.00	0.00
SAN BERNARDINO	0	0.00	0.00	\$0	0.00	0.00
SAN DIEGO	0	0.00	0.00	\$10,189	0.00	0.00
SAN FRANCISCO	0	0.00	0.00	\$0	0.00	0.00
SAN JOAQUIN	0	0.00	0.00	\$0	0.00	0.00
SAN LUIS OBISPO	0	0.00	0.00	\$0	0.00	0.00
SAN MATEO	5,547	0.42	0.00	\$1,979,488	0.74	0.00
SANTA BARBARA	0	0.00	0.00	\$0	0.00	0.00
SANTA CLARA	1,209	0.09	0.00	\$429,172	0.16	0.00
SANTA CRUZ	6,559	0.50	0.00	\$2,363,485	0.88	0.00
SHASTA	185,799	14.21	3.05	\$36,930,938	13.81	1.07
SIERRA	30,748	2.35	32.82	\$4,115,291	1.54	27.88
SISKIYOU	144,874	11.08	18.68	\$30,767,666	11.51	17.16
SOLANO	0	0.00	0.00	\$23,929	0.01	0.00
SONOMA	4,428	0.34	0.00	\$770,936	0.29	0.00
STANISLAUS	0	0.00	0.00	\$0	0.00	0.00
SUTTER	0	0.00	0.00	\$0	0.00	0.00
TEHAMA	66,795	5.11	0.00	\$11,611,657	4.34	0.00
TRINITY	37,868	2.90	11.91	\$7,785,690	2.91	8.51
TULARE	2,433	0.19	0.00	\$214,647	0.08	0.00
TUOLUMNE	35,359	2.70	19.88	\$6,073,861	2.27	15.33
VENTURA	0	0.00	0.00	\$12,316	0.00	0.00
YOLO	0	0.00	0.00	\$0	0.00	0.00
YUBA	21,752	1.66	20.36	\$4,950,991	1.85	19.57
ALL COUNTIES	1,307,337	100.00	11.44	\$267,417,273	100.00	7.54

YTHR2

YEAR 2013 QUARTER 1 TO 4

TIMBER TAX SECTION

COUNTY	VOLUME (NET MBF)	VOLUME PERCENT	PERCENT PUBLIC	VALUE	VALUE PERCENT	PERCENT PUBLIC
ALAMEDA	0	0.00	0.00	\$0	0.00	0.00
ALPINE	0	0.00	0.00	\$12,600	0.00	0.00
AMADOR	13,185	0.80	1.46	\$2,847,555	0.90	1.33
BUTTE	38,101	2.32	2.76	\$8,283,311	2.63	2.77
CALAVERAS	36,257	2.20	7.96	\$6,894,683	2.19	6.35
COLUSA	848	0.05	0.00	\$56,744	0.02	0.00
CONTRA COSTA	0	0.00	0.00	\$0	0.00	0.00
DEL NORTE	8,976	0.55	0.00	\$2,451,513	0.78	0.00
EL DORADO	69,218	4.21	16.64	\$11,369,766	3.61	14.12
FRESNO	15,017	0.91	73.81	\$1,390,320	0.44	68.63
GLENN	1,048	0.06	29.87	\$204,580	0.06	21.21
HUMBOLDT	259,822	15.79	0.04	\$72,517,208	23.02	0.01
IMPERIAL	0	0.00	0.00	\$0	0.00	0.00
INYO	0	0.00	0.00	\$0	0.00	0.00
KERN	2,655	0.16	100.00	\$187,170	0.06	100.00
KINGS	0	0.00	0.00	\$0	0.00	0.00
LAKE	988	0.06	84.78	\$181,920	0.06	94.38
LASSEN	59,995	3.65	12.58	\$11,349,943	3.60	5.42
LOS ANGELES	0	0.00	0.00	\$0	0.00	0.00
MADERA	5,769	0.35	95.93	\$458,809	0.15	97.39
MARIN	0	0.00	0.00	\$0	0.00	0.00
MARIPOSA	5,080	0.31	0.00	\$631,739	0.20	0.00
MENDOCINO	111,574	6.78	0.00	\$26,975,151	8.56	0.00
MERCED	0	0.00	0.00	\$9,030	0.00	0.00
MODOC	65,445	3.98	17.04	\$12,497,974	3.97	14.14
MONO	444	0.03	100.00	\$57,830	0.02	93.67
MONTEREY	0	0.00	0.00	\$5,695	0.00	0.00
NAPA	125	0.01	0.00	\$15,000	0.00	0.00
NEVADA	25,290	1.54	0.15	\$4,924,901	1.56	0.12
ORANGE	0	0.00	0.00	\$25,027	0.01	0.00
PLACER	59,262	3.60	43.45	\$8,997,682	2.86	34.60
PLUMAS	129,738	7.88	34.98	\$16,933,492	5.38	27.95
RIVERSIDE	0	0.00	0.00	\$0	0.00	0.00
SACRAMENTO	0	0.00	0.00	\$39,420	0.01	0.00
SAN BENITO	0	0.00	0.00	\$0	0.00	0.00
SAN BERNARDINO	0	0.00	0.00	\$0	0.00	0.00
SAN DIEGO	0	0.00	0.00	\$8,671	0.00	0.00
SAN FRANCISCO	0	0.00	0.00	\$0	0.00	0.00
SAN JOAQUIN	0	0.00	0.00	\$0	0.00	0.00
SAN LUIS OBISPO	0	0.00	0.00	\$10,069	0.00	0.00
SAN MATEO	5,627	0.34	0.00	\$2,474,946	0.79	0.00
SANTA BARBARA	0	0.00	0.00	\$0	0.00	0.00
SANTA CLARA	0	0.00	0.00	\$39,276	0.01	0.00
SANTA CRUZ	7,828	0.48	0.00	\$3,434,525	1.09	0.00
SHASTA	304,760	18.52	8.99	\$45,472,328	14.44	3.76
SIERRA	23,607	1.43	41.67	\$3,926,297	1.25	37.34
SISKIYOU	164,522	10.00	21.44	\$33,049,583	10.49	16.81
SOLANO	0	0.00	0.00	\$16,200	0.01	0.00
SONOMA	13,487	0.82	0.00	\$3,553,061	1.13	0.00
STANISLAUS	0	0.00	0.00	\$0	0.00	0.00
SUTTER	0	0.00	0.00	\$0	0.00	0.00
TEHAMA	92,774	5.64	1.18	\$12,287,114	3.90	1.87
TRINITY	25,198	1.53	19.64	\$5,134,855	1.63	11.66
TULARE	2,997	0.18	0.00	\$314,993	0.10	0.00
TUOLUMNE	80,507	4.89	21.12	\$12,413,983	3.94	21.43
VENTURA	0	0.00	0.00	\$15,645	0.00	0.00
YOLO	0	0.00	0.00	\$0	0.00	0.00
YUBA	15,326	0.93	6.99	\$3,487,038	1.11	7.05
ALL COUNTIES	1,645,446	100.00	13.56	\$314,957,647	100.00	8.53

YTHR2

YEAR 2014 QUARTER 1 TO 4

TIMBER TAX SECTION

COUNTY	VOLUME (NET MBF)	VOLUME PERCENT	PERCENT PUBLIC	VALUE	VALUE PERCENT	PERCENT PUBLIC
ALAMEDA	0	0.00	0.00	\$0	0.00	0.00
ALPINE	0	0.00	0.00	\$0	0.00	0.00
AMADOR	4,429	0.30	0.00	\$901,275	0.28	0.00
BUTTE	42,799	2.92	20.31	\$8,628,351	2.68	11.10
CALAVERAS	1,948	0.13	42.92	\$340,919	0.11	31.96
COLUSA	193	0.01	0.00	\$15,890	0.00	0.00
CONTRA COSTA	0	0.00	0.00	\$0	0.00	0.00
DEL NORTE	20,550	1.40	0.00	\$5,620,991	1.74	0.00
EL DORADO	55,371	3.78	21.17	\$8,098,105	2.51	13.73
FRESNO	26,508	1.81	97.78	\$2,362,317	0.73	98.10
GLENN	0	0.00	0.00	\$0	0.00	0.00
HUMBOLDT	244,697	16.69	0.75	\$81,513,089	25.29	0.22
IMPERIAL	0	0.00	0.00	\$0	0.00	0.00
INYO	0	0.00	0.00	\$0	0.00	0.00
KERN	1,432	0.10	69.06	\$167,450	0.05	76.24
KINGS	0	0.00	0.00	\$0	0.00	0.00
LAKE	1,721	0.12	91.52	\$397,690	0.12	92.75
LASSEN	29,306	2.00	7.63	\$6,309,432	1.96	2.41
LOS ANGELES	0	0.00	0.00	\$0	0.00	0.00
MADERA	2,348	0.16	90.72	\$239,560	0.07	96.35
MARIN	0	0.00	0.00	\$0	0.00	0.00
MARIPOSA	4,406	0.30	0.00	\$631,146	0.20	0.00
MENDOCINO	115,197	7.86	0.00	\$34,661,018	10.75	0.00
MERCED	0	0.00	0.00	\$8,400	0.00	0.00
MODOC	79,136	5.40	12.29	\$13,220,845	4.10	9.00
MONO	0	0.00	0.00	\$0	0.00	0.00
MONTEREY	0	0.00	0.00	\$0	0.00	0.00
NAPA	0	0.00	0.00	\$0	0.00	0.00
NEVADA	8,211	0.56	11.51	\$1,843,089	0.57	7.19
ORANGE	0	0.00	0.00	\$24,952	0.01	0.00
PLACER	74,601	5.09	46.01	\$12,145,012	3.77	36.93
PLUMAS	97,207	6.63	29.08	\$18,416,398	5.71	19.11
RIVERSIDE	0	0.00	0.00	\$0	0.00	0.00
SACRAMENTO	0	0.00	0.00	\$23,598	0.01	0.00
SAN BENITO	0	0.00	0.00	\$0	0.00	0.00
SAN BERNARDINO	0	0.00	0.00	\$0	0.00	0.00
SAN DIEGO	0	0.00	0.00	\$14,905	0.00	0.00
SAN FRANCISCO	0	0.00	0.00	\$0	0.00	0.00
SAN JOAQUIN	0	0.00	0.00	\$0	0.00	0.00
SAN LUIS OBISPO	0	0.00	0.00	\$8,925	0.00	0.00
SAN MATEO	6,724	0.46	0.00	\$3,426,019	1.06	0.00
SANTA BARBARA	0	0.00	0.00	\$0	0.00	0.00
SANTA CLARA	12	0.00	0.00	\$47,653	0.01	0.00
SANTA CRUZ	11,048	0.75	0.00	\$5,262,461	1.63	0.00
SHASTA	192,176	13.11	2.85	\$39,861,288	12.37	1.29
SIERRA	24,461	1.67	18.23	\$5,530,411	1.72	10.82
SISKIYOU	183,730	12.54	16.33	\$36,744,542	11.40	7.78
SOLANO	0	0.00	0.00	\$14,595	0.00	0.00
SONOMA	13,440	0.92	0.00	\$3,843,276	1.19	0.00
STANISLAUS	0	0.00	0.00	\$0	0.00	0.00
SUTTER	0	0.00	0.00	\$0	0.00	0.00
TEHAMA	48,570	3.31	0.00	\$10,406,073	3.23	0.00
TRINITY	32,401	2.21	10.15	\$5,443,945	1.69	9.42
TULARE	2,393	0.16	21.81	\$193,061	0.06	35.69
TUOLUMNE	130,323	8.89	47.72	\$13,161,383	4.08	54.45
VENTURA	0	0.00	0.00	\$19,992	0.01	0.00
YOLO	0	0.00	0.00	\$0	0.00	0.00
YUBA	10,353	0.71	0.00	\$2,739,044	0.85	0.00
ALL COUNTIES	1,465,691	100.00	16.04	\$322,287,100	100.00	8.25

YTHR2

YEAR 2015 QUARTER 1 TO 4

TIMBER TAX SECTION

COUNTY	VOLUME (NET MBF)	VOLUME PERCENT	PERCENT PUBLIC	VALUE	VALUE PERCENT	PERCENT PUBLIC
ALAMEDA	0	0.00	0.00	\$15,000	0.00	0.00
ALPINE	0	0.00	0.00	\$0	0.00	0.00
AMADOR	1,753	0.11	0.00	\$390,325	0.12	0.00
BUTTE	60,559	3.81	0.00	\$13,717,316	4.15	0.00
CALAVERAS	9,717	0.61	0.00	\$1,719,073	0.52	0.00
COLUSA	0	0.00	0.00	\$0	0.00	0.00
CONTRA COSTA	0	0.00	0.00	\$0	0.00	0.00
DEL NORTE	47,636	2.99	0.00	\$12,807,811	3.88	0.00
EL DORADO	180,032	11.32	1.87	\$13,180,934	3.99	3.27
FRESNO	12,721	0.80	47.19	\$666,481	0.20	45.74
GLENN	0	0.00	0.00	\$0	0.00	0.00
HUMBOLDT	217,503	13.67	0.77	\$71,337,877	21.60	0.68
IMPERIAL	0	0.00	0.00	\$0	0.00	0.00
INYO	47	0.00	0.00	\$7,520	0.00	0.00
KERN	2,516	0.16	28.34	\$163,417	0.05	23.98
KINGS	0	0.00	0.00	\$0	0.00	0.00
LAKE	330	0.02	0.00	\$29,447	0.01	0.00
LASSEN	57,822	3.63	4.56	\$9,695,302	2.94	3.45
LOS ANGELES	0	0.00	0.00	\$0	0.00	0.00
MADERA	8,071	0.51	100.00	\$720,829	0.22	100.00
MARIN	0	0.00	0.00	\$0	0.00	0.00
MARIPOSA	3,399	0.21	0.00	\$249,914	0.08	0.00
MENDOCINO	121,701	7.65	0.00	\$41,150,958	12.46	0.00
MERCED	0	0.00	0.00	\$9,450	0.00	0.00
MODOC	71,419	4.49	11.39	\$9,588,000	2.90	8.62
MONO	0	0.00	0.00	\$0	0.00	0.00
MONTEREY	0	0.00	0.00	\$0	0.00	0.00
NAPA	0	0.00	0.00	\$0	0.00	0.00
NEVADA	10,358	0.65	6.51	\$2,344,639	0.71	2.78
ORANGE	0	0.00	0.00	\$25,455	0.01	0.00
PLACER	47,930	3.01	8.22	\$5,720,597	1.73	9.86
PLUMAS	94,763	5.96	23.06	\$18,452,219	5.59	18.14
RIVERSIDE	0	0.00	0.00	\$0	0.00	0.00
SACRAMENTO	0	0.00	0.00	\$21,969	0.01	0.00
SAN BENITO	0	0.00	0.00	\$0	0.00	0.00
SAN BERNARDINO	0	0.00	0.00	\$9,940	0.00	100.00
SAN DIEGO	0	0.00	0.00	\$16,332	0.00	0.00
SAN FRANCISCO	0	0.00	0.00	\$0	0.00	0.00
SAN JOAQUIN	0	0.00	0.00	\$0	0.00	0.00
SAN LUIS OBISPO	0	0.00	0.00	\$7,362	0.00	0.00
SAN MATEO	4,691	0.29	0.00	\$2,182,509	0.66	0.00
SANTA BARBARA	0	0.00	0.00	\$0	0.00	0.00
SANTA CLARA	38	0.00	0.00	\$49,870	0.02	0.00
SANTA CRUZ	9,614	0.60	0.00	\$4,906,731	1.49	0.00
SHASTA	198,989	12.51	10.70	\$40,238,541	12.19	6.84
SIERRA	9,549	0.60	40.87	\$1,827,380	0.55	46.59
SISKIYOU	249,143	15.66	15.52	\$53,336,097	16.15	13.34
SOLANO	0	0.00	0.00	\$11,250	0.00	0.00
SONOMA	13,722	0.86	0.00	\$4,604,208	1.39	0.00
STANISLAUS	0	0.00	0.00	\$0	0.00	0.00
SUTTER	0	0.00	0.00	\$0	0.00	0.00
TEHAMA	18,762	1.18	6.21	\$3,196,493	0.97	3.28
TRINITY	43,977	2.76	2.98	\$9,012,531	2.73	3.36
TULARE	2,819	0.18	0.00	\$206,230	0.06	0.00
TUOLUMNE	84,415	5.31	95.83	\$7,216,396	2.19	93.95
VENTURA	0	0.00	0.00	\$15,580	0.00	0.00
YOLO	0	0.00	0.00	\$0	0.00	0.00
YUBA	6,747	0.42	6.09	\$1,374,603	0.42	6.38
ALL COUNTIES	1,590,743	100.00	12.86	\$330,226,586	100.00	7.61



MEMO

DATE: June 30, 2017
 TO: John Miller, Senior Planner, Humboldt County Planning & Building
 FROM: Oona Smith, Senior Planner, HCAOG
 RE: County GPUP-RDEIR (May 2017) Proofreading & Comments

Page #	Draft Version	Suggested Edit
3.5-4	S.R. 211 is a short two-lane highway that extends from U.S. 101 to the City of Ferndale, crossing the Eel River over historic Fernbridge.	crossing historic Fernbridge over the Eel River
3.5-5	...as part of the 2008 Regional Transportation Plan (see Humboldt County Regional Transportation Plan, 2008, Table HR1, Significant Roadway and the discussion on Page HR-1):...	See current 2014 RTP (“VROOM”). (Which is also now being updated – ETA Dec. 2018.)
3.5-6	Redwood Transit System. In addition to the mainline route serving US 101, a separate route...	add: Tish Non-Village service. There is also Fortuna Transit, provided for seniors and persons with a disability.
3.5-7	Non-Motorized Transportation (paragraph 2) Such obstructions and impediments can force pedestrians on foot or who use wheelchairs onto road shoulders, and into parking and bike lanes.	“or those who use...” or “or people who use...”
3.5-7	While equine use does not constitute a significant portion of daily commuter travel in Humboldt County,	perceivable or noticeable or detectable
3.5-8	...street crossings that pose pedestrian travel impediments, especially to the mobility-impaired. Most facilities dedicated for bicycle use are in the...	mobility-impaired. ¶ {new paragraph} Most facilities dedicated for bicycle use are in the...
3.5-8	The Elk River Hikshari’ Trail (is a multiple-use, paved trail that runs between Truesdale Avenue (just south of the Bayshore Mall)	remove opening parenthesis
3.5-8	Humboldt County is the lead agency in the Humboldt People Powered Pathways (HP3) funding proposal to the federal government. The HP3 proposal seeks transportation funding to implement local jurisdiction’s plans for improving active transport systems and programs. The HP3 plan identifies approximately 25 active transport planning, implementation programs, and partnerships that identify \$50 non-motorized transportation projects located across the Coun	is? present tense? sought? \$50 million worth of?
3.5-9	Caltrans has completed a Final EIR (SCH # 2009012070) for a project to provide access for larger trucks on U.S. 101 through Richardson Grove State Park near the Humboldt County line.	Completed and EIR Addendum, FONSI, and NOD in May 2017. dot.ca.gov/dist1/d1projects/Richardson_grove
3.5-10	...the only airport in the County with scheduled passenger flights, and passenger enplanements are	

Page #	Draft Version	Suggested Edit
	expected to increase from 98,453 in 204 to 167,000 in 2024 (Arcata-Eureka Airport Master Plan Report, Chapter 2 Airport Role and Activity)	typo: 2004 add comma after Chapter 2
3.5-11	Any other area that requires dredging is the responsibility of local governments, in this area that is the Harbor District.	...governments; in this area the Harbor District is that agency.
3.5-12	Implementation of the proposed General Plan Update would increase the amount of traffic on roadways and could increase the potential for conflict with agricultural vehicles.	Move to analysis section
3.5-12	...found that Pedestrian and bicycle safety is generally poor in Humboldt County when compared to other rural counties. There are substantially higher bicycle injuries and fatality rates in Humboldt County than all other rural areas in California. Bicycle injury and fatality rates are also significantly higher than the state average, particularly for youth and the 05-24 age groups. In spite of this, bicycle and pedestrian injuries and fatalities are decreasing in Humboldt County.	pedestrian ...County compared to... ...and the 15-24? age groups?
3.5-13	...are to support the Regional transportation planning process ¹ , to evaluate potential improvements...	regional
3.5-14	...volume to capacity ratio...	volume-to-capacity
3.5-14	...the volume to capacity ratio is used to measure LOS.	volume-to-capacity
3.5-14	2010 Scenario The transportation analysis zones cover the entire County and each city and include existing and projected future population and employment levels.	and each city, and ?The zones include pop and emp levels?
3.5-14	2028 Scenario ...worse-case scenario.	worst?
3.5-15	As shown, the forecast 18 year and 30-year growth...	18-year
3.5-18	There are no are no adopted plans, ordinances or policies	There are no are adopted plans,...
3.5-18 to 19	The Eureka Community Plan contains a general goal that does not include an MOE: Policy 4220.1 "the County shall strive to maintain a Level of Service of C or better on arterials in the Planning Area. The acceptable level of service goal will be consistent with the financial resources available and the limits of technical feasibility. Plans adopted by HCAOG do not contain required MOEs or LOSs.	... 4220.1, "the... feasibility." {end quote here?}
3.5-19	The County General Plan Update seeks to reduce vehicle miles traveled per person by providing balanced transportation opportunities, whereby the needs of motorized vehicles, public transit, bicyclists, and pedestrians are considered during land use and transportation planning.	Awk: the provision and the consideration seems backwards—?
3.5-19	Policy C-P2, Consideration of Land Uses in Transportation Decision Making, notes that a comprehensive planning approach be utilized that	notes mandates or stipulates Policy C-P2 doesn't consider what

Page #	Draft Version	Suggested Edit
	considers the transportation consequences of land use changes to avoid operational and economic impacts.	consequences land use changes will have on transportation (as this awkwardly states); it directs the County to decide on transportation projects based on existing and planned future land development. General Plan (Jan. 3, 2017): C-P2. Consideration of Land Uses in Transportation Decision Making. Transportation decisions shall be based on a comprehensive planning approach that considers existing land uses, principally permitted land uses and future land development as proposed in adopted County plans and plans of other governmental agencies.
3.5-20	Table 3.5-7 lists only one road in the City of Eureka, that would be affected by the implementation of General Plan Update, and countywide growth expected to occur during planning period, that is the responsibility of Caltrans.	{awfully complicated syntax} add comma or delete comma: ...one road, in the City of Eureka, that would be affected by the implementation of General Plan Update, and countywide growth expected to occur during the planning...
3.5-20	development for each affect jurisdiction. Policy C-P5, Level of Service Criteria, requires that the County shall strive to maintain level of service "C" on all roads and intersections except U.S. 101, where level of service D is acceptable, and advises that the County should not adversely affect Level of Service and/or Quality of Service for other modes of transportation, if possible. This policy compliments policies contained in the City of Eureka General Plan. Policy C-P6, Jurisdictional Coordination and Integration, furthers the level of service standard consistency between the County...	affected Still relying on LOS?
3.5-20	Policy C-P7, Joint Use of Traffic Models, encourages the County-Wide Transportation Plan (CWTP) and projects....to use area-wide travel demand models.	How do you encourage a plan to use TDM?
3.5-20	Mitigation 3.5.3.1.a ...with new large scale development...	large-scale
3.5-23	3. Consider widening the curbs to provide additional travel lanes, bike lanes, 2WLTl, medians, parking lanes, and sidewalks, all as needed to meet demands.	You'd have to widen in between curbs, no? (i.e., widen the ROW. Widening the curb will only provide additional sidewalk; it will narrow all the other lanes)
3.5-23	C-Px. Countywide Traffic Impact Fee Program. In coordination with the cities within the County, shall develop	typo (missing subject)
3.5-24	Conclusion ...fall to LOS "D/E"; therefore, implementation of the General Plan Update would result	This is inconsistent with SB 743.

Page #	Draft Version	Suggested Edit
	in a potentially significant impact.	
3.5-25	...Kmart Traffic Signal to Washington Street, Broadway has a TWLTL. The Broadway corridor is approximately 3 miles in length.	traffic signal
3.5-25	(City of Eureka General Plan Update Mobility Policy Paper	Paper)
3.5-25	...would reduce the LOS of the U.S. 101 Broadway corridor at or below "D," which is the General Plan update LOS standard...	reduce to the at or to below
3.5-26	Mitigation Measure 3.5.3.1.d, impacts related to the future capacity of U.S 101 would be reduced and LOS D is considered acceptable on U.S. 101.	3.5.3.2.d
3.5-26	Main Street and Fortuna Blvd (North and South) in Fortuna are the former alignment of U.S. 101, prior to the construction of the freeway along the western edge of the City.	...were the formerly alignment U.S. 101...
3.5-26	Intersection improvements at 12th and Main also required. After mitigation, these intersections will drop to D. Policy TC-1.2 says LOS D is acceptable on Main Street.	...Main are also... Fortuna General Plan Policy TC-1.2 says...
3.5-26	See the discussion of Impact 3.5.3.2.-4 above for a discussion of General Plan	Wrong #
3.5-26	improvements, typically include the addition of travel lanes, and this would mean adding lanes to areas that are largely built out, leaving little available space to create new lanes without taking land from adjacent properties. or degrade the desired downtown amenities in the area. {This is a really looong sentence.}	improvements, (delete comma) typically include adding travel lanes, and this would mean adding lanes to areas that are largely built out, where there is little available space to create new lanes without taking land from adjacent properties-(delete period) or degrading the desired downtown amenities in the area. {You don't really degrade desired (i.e. non-existing) amenities. Do you mean desirable?}
3.5-27	...Kenmar Road/U.S. 101 North Ramps...	...Kenmar Road/U.S. 101 north ramps...
3.5-27	See the discussion of Impact 3.5.3.2.-4 above for a discussion of General Plan Update Circulation Element policies relating to minimum LOS standards and jurisdictional coordination. In particular, the General Plan Update Circulation Element includes the following policy relating to minimum LOS standards, C-P5, Level of Service Criteria, which strives to maintain a LOS "C" on all roadway segments, except for any portion of U.S. 101, where Level of Service D would be acceptable. See Impact 3.5.3.12.c-1 above, for a discussion of how Policies C-P6 Jurisdictional Coordination and Integration, and C-P7 Joint Use of Traffic Model, lessen potential impacts.	Policy #

Page #	Draft Version	Suggested Edit
3.5-28	...that could <u>Conflict</u> with an...	...that could conflict with an...
3.5-28	c) <u>Conflict with an applicable congestion management program,...</u>	b)
3.5-29	Mitigation Measure <u>3.5.3.2.a</u> will add...	Policy C-IMX7
3.5-30	...has established airport land use compatibility plans for each airport, except <u>Samoa Field</u> .	and Hoopa?
3.5-30	...Humboldt County Airport contains of future airport operations <u>forecasts</u> .	contains <u>forecasts</u> of future airport operations.
3.5-31	Aviation <u>Systems</u> Element. Samoa Field, Hoopa Airport, and Shelter Cove Airport are not anticipated to experience increases in aircraft operations in the next 20 years. The airport master plans identify the improvements <u>if any that</u> may be required to accommodate future aircraft operations.	System if any, that...
3.5-32	Analysis of Relevant General Plan Update Policies ...Circulation Element contains policies to ensure that roadway design <u>reduces</u> roadway safety hazards and accommodate multi-modal users.	accommodates "multi-modal users" — It is better policy to accommodate <i>multi-modes</i> . That way you also accommodate the hypothetical users who use only a single mode.
	The Circulation Element includes policies and standards <u>that that</u> relate to	that that

North Coast Regional Water Quality Control Board

June 29, 2017

Mr. Michael Richardson
Humboldt County Community Development Services
3015 H Street
Eureka, CA 95501

Dear Mr. Richardson:

Subject: Comments on the General Plan 2017 DEIR, SCH No. 2007012089

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the 2017 General Plan Amendment and tentative language adopted by the Humboldt County Board of Supervisors (Board of Supervisors). The North Coast Regional Water Quality Control Board (Regional Water Board) is a responsible State agency with jurisdiction over the quality of groundwater and surface waters (including wetlands) and the protection of the beneficial uses of those waters.

Regional Water Board staff reviewed the tentative language adopted by the Board of Supervisors and the DEIR dated April 2017 for the General Plan, and offer the following comments. The general comments are listed below. In the case of specific suggested language related to climate change, which we hope the Board will consider, we have identified it in ~~strikeout~~ / underline in the attached documents: Chapters 9, 11, 14, and 15 of the 'Chapters Tentatively Approved by the Board of Supervisors (2015) showing edits From Planning Commission Draft (2012)'.

GENERAL COMMENTS


The Regional Water Board would like to be viewed as a partner with the County in water quality protection. We have worked closely with the County on a project-by-project basis in the past and we look forward to continuing to do so.

Regional Water Board staff shares the concerns of the California Department of Fish and Wildlife (CDFW) related to aquatic species and habitat and supports their recommendations. Below is a list of the general categories our agency is concerned about as they relate to water quality and beneficial uses. Regional Water Board authorities and that of CDFW coincide with respect to several of these important issues.

- Surface water and groundwater
- Aquatic species and wildlife
- Riparian and instream habitat

- Watershed planning
- Wetlands
- Water supply
- Storm water
- Low Impact Development
- Cannabis-related impacts

Climate Change

The issue of climate change will likely evolve and change over the timeframe addressed in this General Plan. Regional Water Board staff encourage Humboldt County to proceed with due diligence to address issues related to climate change that can affect any number of water quality and beneficial uses. The County should consider the following: 

- Climate change is a risk multiplier when it comes to water quality conditions. That is, existing water quality impacts and landscape vulnerabilities are likely to worsen under future altered climatic conditions.
- Forward thinking and planning is essential to reducing risks associated with potential climate change impacts. Climate change adaptation plans should be incorporated into the County's General Plan.
- Numerous mitigation measures appropriate to adapt to changing climatic conditions have multiple environmental benefits (e.g. forest retention for carbon sequestration may reduce erosion and subsequent sediment discharge from hillslopes). Use of such measures should be a high priority now and in the future.
- The County is advised to conduct and/or participate with Cities to conduct a comprehensive climate change assessment specific to the potential effects of drought, high intensity winter storms, and sea level rise (SLR) on wastewater infrastructure. The effect of such altered conditions should be assessed with respect to wastewater treatment facilities, sewerage collection systems, disposal areas, and vulnerable areas serviced by onsite waste treatment systems (OWTS). Vulnerable areas of most concern include floodplains and the low gradient areas (e.g., diked and drained wetlands) surrounding Humboldt Bay.

If you have any questions or comments, please contact Lauren Clyde of my staff at Lauren.Clyde@waterboards.ca.gov or myself at (707) 576-6735 or Alydda.Mangelsdorf@waterboards.ca.gov.

Sincerely,



Alydda Mangelsdorf
Senior Environmental Scientist

Enclosures

cc: Mr. Scott Morgan, Deputy Director of Administration and State Clearinghouse,
P.O. Box 3044, Sacramento, CA 95812
Re: SCH No. 2007012089

Chapter 9. Economic Development Element

9.1 Purpose

This Element provides an overview of the economy, characterizing the trends, land, and infrastructure needs that will shape the future. A set of goals, policies, and implementation measures are included to promote and sustain economic prosperity.

9.2 Relationship to Other Elements

The Economic Development Element was prepared to ensure the General Plan considered the needs of the economy. General Plan policies can have significant effects on economic well-being and the sustainability of economic activity. For example, the Governance Chapter establishes regulatory and permit processing policies, which affect the cost of gaining regulatory approvals. The Land Use Element plays a central role in economic activity and growth by establishing rules for the location and manner of development. Housing Element policies affect the supply of housing and, therefore, housing cost. The policies of the General Plan, and this Element specifically, are intended to achieve a balance between the need to sustain and promote Humboldt County's economy and the need to protect and advance the community's collective interests.

The Economic Element also achieves consistency between the General Plan and the County's economic development strategy. In this light, the policies of every element and chapter of the General Plan should support the County's economic development strategy in the same way the policies should support the County's health, safety, welfare, and environmental protection strategies.

9.3 Background

During the last 40 years, Humboldt County has experienced a dramatic restructuring and diversification of its economy. Historically, the local economy was built on natural resources that supported timber production and manufacturing, dairy farming, cattle ranching, and fishing. These industries served as the county's export base, importing capital that helped grow the rest of the economy.

While this historic economic base has diminished and no one industry dominates the local economy today, these industries still contribute substantially to the County's economy. New local industries have emerged that export more knowledge-based, specialty, and technology-driven products and services. In fact, our traditional industries have provided the basis for many of these emerging businesses. Habitat restoration, sustainable forest management, organic milk production, and computer network services are all examples of innovative local products and services that the world needs and wants to buy. These new industries have joined traditional natural resource and agricultural industries to diversify and integrate the County into the global economy.

Diverse Economy

A diversified local economy is desirable because it is stable. A stable local economy sees slower, steadier economic growth and less volatility. In the early 1980s, Humboldt County's unemployment rate was around 12%. During the Great Recession in the US (2008-2012), Humboldt County's unemployment rate tracked at or below California's rate. From 2000-2007, our lowest rate was 5.5% and the state's was 4.9%. During the recession, after the economic peak in 2007, Humboldt's unemployment rate reached a high of 11%, but just below the state average of 11.4%. The recession of 2008-2010 affected the sectors related to financial services, housing construction and retail, the same as the national economy. In the Framework General Plan of 1984, the economic development element reflected the realities of the downturn in the timber and fishing industries. The contraction of these sectors has leveled off in the last decade. The fishing industry has shrunk by two-thirds. Though hit hard by the recent national recession, the forest products industry provides approximately 11% of the direct payroll in the County today, about equal to the education, and research and health care industries.

Though the traditional natural resource industries have declined, they still play a vital role in the local economy. Their contributions are substantial and can remain so for many decades to come. Therefore, it is vital that the County retain an essential quantity, or "critical mass," of land and infrastructure to allow the forest products, agriculture, and fishing industries to remain viable.

Comprehensive Economic Development Strategy

In 2012, the County engaged the public and business community in an extensive economic development process, called *Prosperity 2012*, to update the County's *Comprehensive Economic Development Strategy* (CEDS). CEDS guide local economic development investments, including those from the U.S. Economic Development Administration, Community Development Block Grants and Rural Development. The CEDS lays out a strategy that prioritizes the needs of eight target industries—those that have demonstrated growth in jobs, firms, wages and/or substantial export of products and services to customers outside the region. This strategy applies the leading economic theory and research on how economies function and grow, as well as the knowledge and priorities of local industry, business and community leaders. The county's target industries include:

- Diversified Health Care
- Building & Systems Construction
- Specialty Food, Flowers & Beverages
- Investment Support Services
- Management & Innovation Services
- Niche Manufacturing
- Forest products
- Tourism

The first six industries were based on their fast growth in new jobs, firms, wages and concentration (an indicator of export). The *Redwood Coast Targets of Opportunity Report 2012* (Part V of the CEDS) provides the economic performance data for the CEDS and profiles each of the eight industries in detail. The Redwood Coast region includes Humboldt, Del Norte, Trinity, Siskiyou and Mendocino counties. From 1995-2009, the top six Target of Opportunity industries combined grew new jobs at 14%, versus the region which lost jobs at -6.1%. They also grew wages at an average of 36%. The region lost

firms at -15.5%, while firms in the Target of Opportunities closed at half that rate (-8.8%). These industries now provide 42% of the region's private sector jobs.

Additionally, Forest Products and Tourism are identified as important target industries. Each utilizes Humboldt County's natural resource assets, exporting lumber and attracting tourists. Six of the eight total target industries pay (29% to 47%) above the regional average annual wages. All the target industries demonstrate competitive advantage in national and international markets, and provide opportunity for living wage careers, entrepreneurship, and future growth.

Industry leaders throughout the CEDS planning process identified entrepreneurship, innovation, and quality of life as critical requirements of the new economy. They emphasized that the County's economic competitiveness depends a great deal on its beautiful natural setting, small-town character, and vibrant creative culture. On March 26, 2013, the Humboldt County Board of Supervisors adopted Prosperity 2012 Parts I-V as Humboldt County's Comprehensive Economic Development Strategy, and it was accepted by the US Economic Development Administration.

Regional Role

Economies form around natural geographic boundaries, clusters of similar industries, natural resource assets, infrastructure, and a common culture or history. These pieces work together to define a regional economy, which often includes and crosses several jurisdictional boundaries of cities and counties. Nationally, economists and the federal government emphasize the value of aligning strategies and resources with the needs of regional economies.

Humboldt County is part of a regional economy that includes the neighboring counties of Del Norte, Mendocino, western Trinity and Siskiyou counties, and the cities within those boundaries, as indicated in the *Redwood Coast Targets of Opportunity Report 2012*. The export industries of the County span the region with many companies operating both here and in neighboring counties. Many economic assets, such as productive timber and agricultural lands, microclimates that provide long growing seasons, recreational opportunities, a desirable quality of life, and high levels of innovation and entrepreneurship are shared across the region. Obstacles such as lack of interstate truck access, widespread and redundant broadband Internet service, a serviceable railroad, and deteriorating infrastructure and geographic isolation are also shared with our neighboring counties. These shared assets and obstacles provide good reason to coordinate economic development strategies and investments.

Economic Trends

The General Plan must consider local, state, national, and international trends to maximize and sustain traditional natural resource industries and support growth in emerging industries. Land use policies and infrastructure investments must both protect and enhance the ability of traditional industries to compete and allow emerging industries to thrive.

State, national, and international trends have a significant impact on the local economy. Though market forces are beyond the control of local governments, Humboldt County can implement measures to protect and enhance the region's competitive advantages.

Quality of Life

Quality of life is one of Humboldt County's most important assets for economic development. "Quality of life" can relate to almost every aspect of our lives, from public safety to natural beauty, and may be defined differently for different people. This Element does not attempt to define quality of life in every aspect, but rather to focus on the economic implications of quality-of-life factors. In economic terms, quality of life is primarily and inextricably linked to the workforce. It is about the value inherent in the natural, the built, and the cultural environments that attract creative, entrepreneurial talent. Research on rural economies consistently shows that rivers, beaches, forests, mountains, and a community "sense of place" are highly attractive to talented, innovative, creative people who are deciding where to live and start a business. In short, communities that emphasize social and cultural amenities are attractive to talented workers and entrepreneurial businesses.

The built environment of talent-attractive communities is typically "human scale." Hallmarks of human-scale communities include mixed commercial and housing uses, allowing people to work close to home; the use of multiple modes of transportation, including walking and biking; access to childcare, recreation, and commercial services during business hours; and conduct business in cafes and other small meeting spaces.

As the global economy increasingly values knowledge-based workers to provide innovations and solutions, businesses and industry have increasingly sought to employ these creative, technologically savvy workers, the so-called "creative class." Businesses follow this talent base wherever it exists, knowing it provides them with a competitive advantage. The "creative class," in turn, is mobile, willing, and able to locate where the amenities and community appreciate and stimulate their creativity.

Workforce and Targets of Opportunity

Prior to the recession of 2008-2010, the United States was anticipating a massive labor shortage, particularly at middle to upper management levels, from the retirement of the Baby Boom Generation. While large-scale retirements did not occur due to the dramatic drop in stock market values during the recent Great Recession, as retirement funds rebound, it is likely that people will retire and open up many positions. Prior to the recession, local employers in many sectors struggled to fill entry-level and advanced positions, a situation only blunted for a few years by the recession. Labor shortages at all levels will affect local industries and will likely be exacerbated by the national shortage over the next ten years or more.

In the Targets of Opportunity industry study of 2007, which first identified the Target of Opportunity industries, they demonstrated fast growth: employment grew by 37%, firms by 23%, and wages by up to 26% in the 15 years studied (1990-2004), compared to 4% job growth, 1.5% firm growth, and 6% wage growth for the overall regional economy. The 2012 report covers an overlapping period 1995-2009 ending with the recession, which clearly muted the Target industry growth. Still these industries far outperformed the region as a whole, as noted earlier.

While these growth industries offer real opportunities for prosperity, they are not an absolute guarantee of success. In focus groups for the study, employers universally identified the chronic need for workers as constraining their growth. Our region has workforce in transition from one shrinking industry, like forest products, and into multiple emerging industries, like management & innovation services. This workforce needs re-

training to find meaningful careers and meet employer needs. Nationally, four groups in particular are expected to continue to suffer a shortage of employees: (1) health care, (2) manufacturing, (3) energy, and (4) public sector. In addition to future anticipated losses due to retirements, skilled workforce shortages already exist (and will continue) in decision sciences (e.g., finance, accounting, marketing, etc.), hard sciences, and engineering.

Education and training, both professional and vocational, determine an individual's ability to earn a living wage and provide value to business. While Humboldt County has a high proportion of people with a bachelor's degree or higher, it has low high school graduation and continuation to college rates. Only 48% of the county's high school graduates go on to college or vocational school, compared to 56% statewide.

The County must continue to invest in workforce-training services to ensure that workers have the ability to acquire skills and advance throughout their careers. In addition, protecting and enhancing quality-of-life assets is the best way to attract and retain skilled workers.

Regulatory Policy

Federal, state, and local regulatory policies and codes have a significant effect on the economy. Efforts to mitigate the environmental effects of timber harvesting have resulted in compliance costs that threaten the economic viability of the industry. Fisheries management efforts control harvest levels and the size of the fishing industry. Ranching and dairy industries are under increasing regulatory scrutiny. The building industry feels mounting pressure from increasing fees and mitigation requirements, cumbersome permit processes, and complaints from project neighbors. Small businesses and microenterprises are often discouraged from legitimizing their businesses because of the high costs and complexity of regulatory permitting.

Regulations may have unintended economic consequences. For example, conversion of forest and rangeland to residential uses is being accelerated by the rising costs of timber harvesting. Permit timeframes for land development are out of step with the pace of business, which can stifle investment and put Humboldt County at a competitive disadvantage. Excessive small business compliance costs promote an underground economy that marginalizes economic benefits.

Many disagree on the cost and benefits of regulations, but there is widespread agreement and support for regulatory systems that are simple, transparent, and efficient.

Microenterprises and Home-based Businesses

Microenterprises and home-based businesses with five or fewer employees provide an important source of family income, and they often grow with time and investment. From 1997 to 2001, microenterprises accounted for 22% of the job growth, and provided 18% of employment in California. Microenterprises can double household income and help keep families above the poverty line. Typically, microenterprises account for a higher proportion of the jobs in rural counties. Humboldt County's high rate of new firm creation underscores the importance of microenterprises.

Energy

Energy costs affect all levels of production and distribution of goods and services. Energy costs are expected to continue to increase and impact business operations. This trend

will impact the goods distribution sector the most. Rising energy costs are another reason Humboldt County should focus on knowledge-based industries that utilize broadband Internet. Providing broadband services to all communities will also help residents and visitors rely less on cars and reduce the number of vehicle trips required for work and necessities. Energy strategies that move the county from an energy importer to an energy exporter could build significant economic wealth. Policies supporting this transition are included in the Energy Element.

Global Warming

Global warming and climate change has the potential to directly impact Humboldt County. The potential for more intense storms could result in more frequent disruptions and damage to critical infrastructure such as energy, Internet, and road systems. The County should plan for and invest in emergency management systems to minimize damage and reduce the risk of a catastrophic disruption. The health of our forests may be affected through increased susceptibility to disease or forest fires. Climate change initiatives, such as carbon cap and trade schemes, may represent an economic opportunity for the county because of the sequestration value of our forests and the export potential of our energy efficiency and alternative energy expertise. **These initiatives to address climate change would consider the co-benefits in other sectors such as water resources. Co-benefits would factor into decision-making process for implementation.**

Workforce Housing

Like most of California, Humboldt County struggles with providing opportunities for first-time homebuyers as well as multi-family housing options. In the past, investment in real estate has increased equity and property values but exacerbated constraints on housing for the poor, elderly, and working families. Though still lower than much of California, the county's housing prices have risen to a level where it can no longer market low-cost housing to attract businesses and a workforce. In order to provide housing for the workforce of emerging industries, the County must produce new types of housing in a mix of affordable ranges and work with cities to provide more mixed-use and multi-family housing developments. The County should also provide affordable housing opportunities in the urban unincorporated areas.

Childcare

Childcare enables parents to work productively and is an essential support service industry for a functioning economy. Unscheduled absences result in significant costs to both small businesses and large companies. In Humboldt County, one in five workers have children under age 18 and live in a household where both parents work. The need for childcare in the County is expected to grow as the demand for labor increases. There is a need for subsidized care for parents working in lower paying service and retail trade sectors, as well as a need for affordable care for middle-income working parents.

Aging Population

While census data does not indicate that Humboldt County is acquiring a disproportionately large population of retirees, the national trend of an aging Baby Boomer population is happening here. The percentage of retirement age persons is just 1.8% above the state. The median age is 35.7 years, the lowest in the region, and only 1.3 years older than the state average age. The economic consequences of an aging

population include a shift in the demand for local goods and services. The main demands are expected to be health and aged care, home support services, subsidy of

medical services, community transport, and a range of cultural and recreation services. Providing these services presents an opportunity to serve the local population and attract seniors seeking desirable retirement communities.

Cannabis

The production and sale of medicinal and illicit cannabis contribute significantly to Humboldt County's economy. The impact is difficult to measure but its effects are unmistakable. For example, the size of the retail and restaurant sector is out of proportion to official income levels. While the production and sale of medicinal cannabis is legal and local jurisdictions are collecting data that can be used to measure the size of this industry, the size of the illegal industry cannot be measured directly. Many assume it is the largest single industry in Humboldt County.

While cash circulating is undisputedly good for the local economy, the industry's use of residential, agricultural and timberlands can result in environmental impacts land use conflicts. The competition for labor can also be problematic, for example there is a strong appeal to local youth to enter the cannabis trade instead of preparing themselves for a legal career.

If statewide efforts to legalize cannabis are successful, the County may enjoy a legal and economically viable industry based on the expertise, quality and market reputation that Humboldt County gained in the production of illicit cannabis. While there are practical and legal limitations on the County's ability to support illicit cultivation, support for legal cultivation should be a part of the County's overall economic policy.

Large Format Retail

The transition from small-scale decentralized locally owned businesses to large-format, chain-operated businesses is driven by economic factors beyond the control of Humboldt County. These factors include, but are not limited to, corporate globalization and how the state allocates property tax revenue. So-called "big box" developments can occupy more than 50,000 square feet, with typical ranges between 90,000 and 200,000 square feet depending on the product line of the retailer. Business operations derive profits from high sales volumes rather than price mark up.

Big box development can have profound impacts on the character of a community. Hallmarks of big box development include large windowless, single-story buildings; standardized facades; reliance on automobile-based shopping; significant acreage dedicated to parking; minimal site development lacking community or pedestrian amenities; and difficulty in marketing sites if an operation shuts down.

Big box developments can provide low prices and convenience to local consumers as well as sales tax revenue to local governments. They can also recapture sales made to big box stores by local residents outside the local area. Whether these benefits outweigh the social, community, economic, and environmental impacts of big box development is highly disputed. For example, reliance on the automobile for these developments can have a tremendous impact on the capacity of transportation facilities and contribute to air pollution. Large format retailers that focus on one product line can become "category killers" for existing decentralized small businesses. Local capital spent on purchases at big box stores leaves the region prematurely, without circulating amongst support and secondary businesses. Permit processes for big box retail should consider impacts on the existing retail economy, as well as design, location, and economic standards to mitigate the potential impacts.

Infrastructure

The efficient and reliable movement of goods, people, and ideas is essential to all industries. Transportation and freight facilities, highways and roads, Internet and utilities, and water and wastewater facilities are all examples of critical economic infrastructure.

Broadband Internet

The Internet is the backbone of business today. Through broadband Internet connectivity, small and large companies can have employees and consultants distributed around the world. The location of a company's headquarters is no longer determined by access to raw materials, but driven by a range of considerations, including access to talent, customers, industry networks, and quality of life for the principal owner and key talent of the company.

With quality of life as a competitive advantage, Humboldt County is positioned to attract and grow entrepreneurs and businesses with products and services marketed through the Internet. Already, the county is home to numerous companies organized this way, with employees and consultants who telecommute.

To take full advantage of the broadband internet trend, the county must invest in telecommunications, including construction of a second fiber optic line to the county and internet access for outlying communities.

Water and Wastewater

Many water and wastewater systems for cities and unincorporated communities have either reached the limit of their planned capacity or are failing. The situation is resulting in pollution concerns, where residents are being exposed to health hazards in some communities, while imposing limits on new housing and business development in others. Lack of adequate and expandable water and wastewater infrastructure severely inhibits communities' ability to maintain or enhance quality of life, or provide space for businesses to locate. The upgrading, expansion, and construction of new water and wastewater facilities is necessary to build affordable housing and livable communities, as well as to expand opportunities for business to locate and to grow.

Highways

Because of its rural and remote location on the North Coast of California, Humboldt County is at a disadvantage in the transportation of freight, particularly by truck. Standard-size interstate trucks are not allowed to pass through several tight turns on highways 101 and 299, making the import and export of equipment, products, and cattle more expensive, time consuming, or impossible in some cases. Highway restrictions are reported as a concern by every industry in the region and are a substantial and serious constraint to economic growth and sustainability.

Facilities construction and other solutions are planned for sections on both highways, but not all are funded at this time. The bypass of Confusion Hill on U.S. 101 is scheduled for completion by 2008. While it will address the issue of frequent landslides and reduce one area of constraint for interstate trucks, the bypass will not relieve the restriction on interstate trucks completely. As obtaining state highway funding is a highly competitive process and lobbying by metropolitan areas often diverts funding away from North Coast priority projects, the need for regional transportation solutions and advocacy is urgent.

Rail

The only rail line into Humboldt County has been closed since 1990 due to storm damage in the Eel River canyon. The North Coast Railroad Authority (NCRA) estimates the cost of re-opening the complete line to Arcata/Samoa to range between \$151 and \$500 million, depending on the standard to which the line is prepared. Despite sustained efforts, the funds for all phases are not committed at this time.

The funding and demand for rail transportation appears to change in cycles as a result of national and international factors. Currently, national policy focuses on funding for highways and truck transportation. Should national (and state) policies change to favor rail infrastructure, perhaps as a result of energy costs, the prospects for funding the re-opening of the line to the County could improve.

Rail is typically a cost-effective and environmentally preferable mode of transportation for both goods and people. In order to take advantage of opportunities as cycles change, County policy should be to maintain the railroad right-of-way and remain supportive of re-opening the line when it can be economically justified. At the same time, the County must pursue improvements in other transportation modes. (For additional discussion of the use of county railways see the Circulation Element, Chapter 7.)

Port and Bay of Humboldt

Humboldt Bay is the only deep-water port on California's North Coast, and as the second largest natural bay in the state, it is an economic asset that supports commerce, conservation, and valuable cultural and recreational amenities.

For commerce, the Port of Humboldt Bay provides essential infrastructure to the forest products industry (for exporting and importing raw logs to local mills), and to the fishing and aquaculture industry (for fishing boat facilities, fish processing, and growing shellfish). Humboldt Bay's capacity to be a major import or export facility for container ships is limited by other transportation infrastructure. As mentioned previously, there is currently no railroad to carry goods into or out of Humboldt Bay, and the restriction on interstate trucks makes exporting goods by truck inefficient.

Continuing and enhancing the existing commercial value of the port requires substantial maintenance investment, such as periodic dredging, dock repairs, and development of appropriate facilities. Ready-to-build land, capable of supporting marine-dependent coastal industries, is also a critical constraint. The infrastructure for the fishing industry (docks, fueling stations, and ice supply) has deteriorated to a critical state. Maintaining and enhancing the port infrastructure is critical to the continuation and recovery of these industries.

Mariculture (shellfish farming) has particularly strong potential in Humboldt Bay. These operations depend on protecting the water quality of the bay. Expansion of this industry should be supported with permit coordination and streamlining, improved dock and processing facilities, and public education.

Rural regions with more access to natural water amenities (bays, rivers, and oceans) tend to attract higher paying, knowledge-based jobs and companies. Accessing Humboldt Bay for recreational activities, such as kayaking, bird watching, walking, cycling, and fishing, supports all local industries in their efforts to attract and retain talent, customers, and innovate, new products and services. Combined with the historical and cultural sites

currently being developed, Humboldt Bay could become an anchor attraction for local residents, workforce talent, and tourists.

Commercial usage and recreational access should be carefully planned to allow maximum access for both purposes and avoid use conflicts. Development of bicycle and pedestrian trails, docks, and other access points, in coordination with the railroad and other rights-of-way, should be supported and facilitated in order to maximize Humboldt Bay as a quality-of-life and tourism asset. (For additional discussion see the Circulation Element, Chapter 7.)

Airport

The Arcata/Eureka Airport serves the entire North Coast region. One commercial air carriers, United Express and consistently provide direct scheduled service to Portland, Los Angeles, Sacramento, and San Francisco (with other carriers intermittently serving additional flights to Salt Lake City). The airport is a critical economic asset, allowing the movement of people who do business with customers and partners outside the region.

The U.S. Department of Agriculture reports that airports are key components of a transportation infrastructure that can substantially improve the economic potential of a rural region. Access to an airport both increases businesses' ability to market their products and services to global customers and makes air commuting possible for those who depend on urban centers but seek a rural lifestyle and its amenities. While 98.2% of Humboldt County's residents live and work inside Humboldt County, the 300–400 people who live here and work elsewhere commute to distant cities like Los Angeles and Sacramento, likely via airline.

Additionally, five general aviation airports in Garberville, Murray Field (Eureka), Rohnerville, Kneeland, and Dinsmore provide important services for air couriers, air ambulance, air charter, law enforcement, and private pilots. Each airport is critical to the community it serves during natural disasters due to the rural nature of the county. The County must actively work to protect and enhance our airports' service capacity so that more flight destinations become available, weather-related delays are minimized, adjacent land use conflicts are avoided, and overall reliability and safety increases. (For additional discussion see the Circulation Element, Chapter 8.)

Lands

The approach to determining industrial and other employment land needs involves inventorying current land supply, projecting future demand, and then comparing the current supply with anticipated demand.

Supply and Demand of Land for Employment

The February 2002 *Building Communities* report—prepared for the General Plan Update—projects a net increase in the number of jobs in Humboldt County for the next 25 years. This trend will be accompanied by an increased demand for land for industrial and other employment-related uses.

The report found that, in unincorporated areas of the county, a total of 244 acres would be required to meet anticipated future development. Of this total acreage, 15 acres would be required to meet the demand for retail space, 181 acres needed for office/business park space, and 48 acres needed for industrial purposes.

Ensuring that land is available where job and retail growth is likely to occur, and that the size and configuration of lots is suitable for the likely uses, is critical. The supply of industrial and other employment sites is described in the Commercial and Industrial Sites Database, an online searchable inventory of all the commercial and industrial sites maintained by the County. To ensure an adequate land base for commercial and industrial demands, the inventory should be maintained to support suitability analyses of individual lots and supply and demand evaluations of the entire inventory. Plan and zone changes of individual properties should be conducted to maintain a 20-year supply of industrial commercial properties.

Conversion of Prime Employment Lands

The conversion of prime employment lands to other uses is an issue facing many jurisdictions along the West Coast. Prime employment lands are the most economically productive. These lands possess unique characteristics, such as location, soils, access to infrastructure, or other factors that make them difficult to replace within a planning area or region if converted. Prime employment lands include, but are not limited to, large industrial sites; productive agricultural, timber, and mineral resource lands; and coastal dependent lands.

The conversion of land through the changing of a general plan or zoning designation is *not* always undesirable. In some cases up-zoning a property with brownfield issues (discussed below) can enable cleanup and redevelopment. In other cases, changing a designation represents flexibility in the land use system to respond to changes in the market over time. The conversion of productive and suitable employment lands, however, should not reduce the available quantity below a minimum critical landmass for industries. Conversions should also avoid creating deficits in certain land categories, leaving the County poorly positioned for business recruitment, expansion, and retention.

In addition to the threat of conversion, prime employment lands must also be protected from the encroachment of incompatible uses. Residential uses can conflict with industry and agriculture if effective buffers or transition areas are not adequately planned. Protecting these lands from conversion and encroachment is an important strategy for maintaining economic productivity.

Brownfields

A "brownfield" is real property for which reuse is complicated by the presence or perception of contamination. Brownfields can, but do not always, pose risks to human and environmental health. Cleaning up and redeveloping brownfields takes development pressure off of resources lands, reuses existing infrastructure, protects the environment, and can address environmental justice concerns.

Humboldt County has approximately 2,000 acres of brownfields. Most are artifacts of the timber industry. As that industry has diminished, certain sites, typically zoned heavy industrial, have become underutilized. Some of these sites should remain in industrial designations, while others may be appropriate for conversion to other uses. The competition for land in the county will continue to intensify over time. Therefore, the cleanup and redevelopment of brownfields is a strategic and necessary component of the County's land management policies.

9.4 Goals and Policies

Goals

- ED-G1. Stable Economy.** A diverse, stable, and growing local economy.
- ED-G2. Natural Resource Assets.** Long term economically viable and environmentally sustainable, utilization and enjoyment of natural resources.
- ED-G3. Strategic Planning.** A comprehensive economic development strategy that guides progress on economic development goals and informs the public on emerging markets, innovations, and opportunities for entrepreneurship that benefit the region's economic prosperity.
- ED-G4. Cooperation and Collaboration.** Productive partnerships with cities, neighboring counties, and the private sector that build and enhance common assets and resolve common obstacles.
- ED-G5. Economic Development Assistance Programs.** Financial and technical assistance programs that support wage growth, full employment, and businesses inclusive of disadvantaged communities.
- ED-G6. Competitive Quality of Life.** Maintained and enhanced natural resources, recreational opportunities, quality education, vibrant town centers, access to employment, housing, retail, health care, childcare, safety, multimodal transportation, advanced telecommunications, and cultural and natural amenities.
- ED-G7. Skilled and Ready Workforce.** Proactive development of the workforce through access to early and higher education, vocational training and retraining.
- ED-G8. Regulatory and Permit Streamlining.** Stated and clear permitting and licensing processes which engage with businesses, (including micro-enterprise and home-based startups) in a timely, effective and proactive manner.
- ED-G9. Telecommunications.** Reliable, redundant and modern telecommunications infrastructure and services that can attract and retain businesses.
- ED-G10. Public Water and Wastewater.** Adequate public water and wastewater facilities to accommodate the needs of the community. Utilize available industrial water resources to provide jobs, revenue, economic resources, and economic enhancement to the county.
- ED-G11. Transportation Networks.** Transportation facilities and services that allow competitive connectivity for freight and people to metropolitan areas and worldwide markets.
- ED-G12. Land Inventory.** A sufficient land inventory ready to meet the current and future demand for high value uses such as commercial and industrial expansion and natural resource production.

ED-G13. Brownfields. A successful recycling program converting underutilized brownfields into valuable land uses.

ED-G14. Climate Change. Factor climate change mitigation and adaptation into planning.

Policies

ED-P1X. Economic Stability and Diversity. Promote economic stability, growth and diversity by emphasizing development of industries identified as priorities in the County's Comprehensive Economic Development Strategy (without excluding other industries) and encouraging innovation, entrepreneurship, and global competition.

ED-P1. Financial Resources. The County shall acquire state, federal, and private grants for workforce training, economic research, infrastructure, and local business development consistent with the County Economic Development Strategy.

ED-P2. Job Growth and Workforce. Collaborate with economic development entities in the region to promote job growth, and entrepreneurship in industries identified as priorities in the County's Comprehensive Economic Development Strategy (without excluding other industries). Work with the education and private sectors to promote education, vocational training, professional development, and lifelong learning in the workforce.

ED-P3. Affordable Housing. Promote housing at a price commensurate with income levels as reflected in the County Regional Housing Needs Allocation, and a transportation system to provide efficient connectivity between housing and places of employment to minimize commute travel times and distances.

ED-P4. Childcare. Promote the provision of childcare facilities within business, commercial and industrial centers, and housing developments. Streamline the permitting requirements for new childcare facilities. Foster private/public partnerships with childcare service and information providers.

ED-P5. Aging Population. Plan for and respond to the increasing transportation, service, and housing needs of the county's aging population.

ED-P7. Broadband Internet. Support broadband improvements necessary to maintain the County's business competitiveness and serve remote communities.

ED-P8. Public Infrastructure. Assist local service providers in the pursuit of state and federal funding and development of land use assessment, rates and connection fee programs to upgrade and enhance infrastructure, including water, wastewater and recreational facilities.

ED-P9. Freight Mobility. Support pursuit of financial and technical solutions to improve interstate truck and rail access.

ED-P10. Rail. Support protection for the NCRA right-of-way and assets to preserve the ability to re-open the line in response to a demand for rail service.

- ED-P11. Port Development.** Support efforts to maintain and develop the port for shipping, the fishing industry, aquaculture, renewable energy, coastal-dependent and -associated industries.
- ED-P12. Airport Service Expansion.** Support expansion of airport services to include reliable service to multiple major airport hubs, carriers and expanded flight schedules.
- ED-P12A. Airport-Related Business Development.** Support efforts to maintain and develop airports to accommodate air service-dependent and -associated industries, including air freight.
- ED-P13. Prime Employment Land Protection.** Plan and zone sufficient land to maintain a 20 year supply of industrial and commercial properties and protect prime employment land.
- ED-P14. Industrial and Business Parks.** Promote development of planned and designed industrial and business parks with special consideration for ports, airports, value-added manufacturing and industries identified as priorities in the current County Economic Development Strategy. Encourage master environmental assessments and pre-permitting for industrial and business parks in order to streamline the subsequent development process.
- ED-P15. Revitalization.** Promote strategies such as infrastructure and/or economic development to revitalize disadvantaged communities.
- ED-P16. Brownfields.** Pursue and distribute funding and technical assistance to assess, clean up, and reuse Brownfields. Streamline the County's review process for proposed development in commercial and industrial zoned Brownfields.
- ED-P18. Higher Education.** Support College of the Redwoods and Humboldt State University education and training programs that provide residents with the skills and knowledge to qualify for living wage careers and enhance the competitive edge of the industries in our region. Support K-12 educational programs that prepare students for careers in regional industries.
- ED-P2X. Local Vendor Preference.** Support and assist with the Development and implementation of procurement policies and procedures that increase access for locally-owned companies to bidding process, and that considers local economic impact in selection process.
- ED-P3X. Value Added Manufacturing.** Support opportunities to remove barriers to and facilitate expansion of value-added manufacturing.
- ED-P4X. Tribal Government Partnership.** Pursue and support economic and infrastructure partnerships with Tribal Governments.
- ED-P5X. Telecommuting and Workforce Development.** Promote and seek resources to ensure that the county has a broadband infrastructure that encourages economic and workforce development and promotes telecommuting.

9.5 Standards

- ED-S1. Childcare.** The County shall consider childcare facilities within commercial and industrial zones as a principally permitted accessory use when supporting that business or industrial use. Develop a tiered permitting system ranging from principally permitted to conditionally permitted, according to size and location when in commercial or industrial zones but not directly supporting the business or industrial use and within residential zones.
- ED-S3. Disadvantaged Communities.** Communities shall be considered disadvantaged based on one or more of the following factors: disproportionately lower median incomes, higher unemployment rates, deteriorated housing conditions, or high commercial and industrial land vacancy rates.

9.6 Implementation Measures

- ED-IM1. Economic Development Strategy.** Maintain the County's Comprehensive Economic Development Strategy in collaboration with local jurisdictions, businesses, economic development organizations and the public. Conduct and disseminate economic research relating to emerging markets, innovations, and opportunities in which the region may have competitive advantages.
- ED-IM2. Economic Development Programs.** Operate economic development programs that promote workforce development for industry needs and provide technical and financial assistance. Provide incentives including but not limited to delivering capital, technical expertise, and training to businesses starting up and expanding. Seek funding to support programs, particularly US Small Business Administration and Community Development Block Grants for micro-enterprise.
- ED-IM3. Disadvantaged Community Assistance Programs.** Operate economic development programs that promote and seek funding for development assistance to disadvantaged communities.
- ED-IM4. Permit Streamlining for Business Growth.** Update ordinances and permit processes to increase efficiency and reduce permit-processing times addressing constraints to business growth including micro enterprises and home-based businesses.
- ED-IMX. Regulatory Incentives for Emerging Industries.** Provide regulatory incentives for base and emerging industries proposing to expand their business operations and workforce.
- ED-IM5. Commercial and Industrial Sites.** Maintain and update the commercial and industrial sites database, including identification of prime employment sites, on a six month cycle and provide current online maps of vacant industrial and commercial properties using the County's Geographic Information System.

- ED-IM6. Childcare.** Modify land use ordinances to reduce permitting requirements for childcare facilities and support development of funding sources.
- ED-IM7. Large Format Retail.** Develop guidelines for conducting economic and workforce impact analysis for "big box" commercial uses.
- ED-IM8. Transportation and Infrastructure.** Operate economic development programs that promote and seek funding for transportation and infrastructure development critical to economic growth, including telecommunications, regional highway improvements, port development, airport expansion, and water and wastewater systems.
- ED-IM9. Special Economic Development Zones.** Support promotion of benefits and usage of special economic development zones to the business community.
- ED-IM10. Brownfields.** Develop zoning standards to provide increased flexibility for interim land uses and continuation of legal non-conforming uses to encourage cleanup and reuse of underutilized commercial and industrial zoned brownfields.
- ED-IM1X: Support Entrepreneurial Business Systems Efficiency.** Encourage local economic development entities to provide support and information resources for entrepreneurial business systems efficiency and management, particularly as the marketplace evolves (e.g. licensed Point of Sale systems).
- ED-IM4X. Economic Data Sharing.** Publish economic data showing how the county, the region and the target industries are performing at least annually. Compare Humboldt to other rural counties in the region, the state and the nation.
- ED-IM11X. Material Reuse.** Identify under-utilized and discarded materials and the waste byproducts of local industry (especially manufacturing, forest products and agriculture/food production). Work with other entities to encourage "highest and best use" opportunities for waste reduction and end-use markets with in the local economy such as reuse or as feedstock for local manufacturers.

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Chapter 11. Water Resources Element

11.1 Purpose

This Element addresses water planning issues including river and stream water quality, stormwater runoff, groundwater management, water needs of fish and wildlife, water consumption, conservation and re-use methods, and state and federal regulations.

11.2 Relationship to Other Elements

These and other water-related topics can be found throughout the General Plan. Water availability for development is addressed in the Land Use Element. The Conservation and Open Space elements address riparian corridors, wetlands, wildlife protection, fishery resources, other biotic resources, water-oriented recreation, and soil erosion. The Community Infrastructure and Services Element addresses public water and wastewater systems.

11.3 Background

Surface and Groundwater

Large rivers and biologically rich watersheds are defining characteristics of Humboldt County. These resources provide local water supply, spawning habitat for fisheries, recreation opportunities, and local wealth for the fishing and tourism industries. The Eel, Trinity, and Klamath rivers extend well beyond county borders linking Humboldt to the complex regional, state, and interstate water resource and habitat management issues affecting their respective watersheds. The average annual runoff of the rivers running through the county reflects almost 30% of the state's total runoff. Significant sections of these rivers and the Van Duzen River have been designated by the California legislature as wild, scenic, or recreational under the California Wild and Scenic River System. North Coast watersheds retain some of the last viable salmon and steelhead populations in the state and are a focal point for regional, state, federal, and tribal habitat recovery efforts. Managing these water resources will be a significant challenge in the years ahead as competition between statewide water demand, habitat requirements, and local water supply intensifies.

While mean annual runoff in Humboldt County from the major rivers and streams is approximately 23 million acre feet, over 80% of this flow occurs during November through March, and the total potential annual groundwater yield of the entire county is only approximately 100,000 acre feet. Ground water has been developed for individual domestic requirements, the agricultural demands of the Eel and Mad River delta areas, and to provide supplements to municipal water supply. Potential concerns are saltwater intrusion in coastal areas and the effects of groundwater withdrawal on streams that rely on groundwater recharge to sustain flows during the dry season.

State law passed in 2014 (AB 1739) requires counties or other local agencies to develop and implement "groundwater sustainability plans" by 2020 for groundwater basins that

have been assigned a priority rating of “high” or “medium” by the State Department of Water Resources (DWR). The Eel River Valley groundwater basin has been assigned an initial priority of “medium,” requiring a groundwater sustainability plan. The other 13 mapped groundwater basins in the County have been given a “very low” priority, although the groundwater basin boundaries and prioritizations could change in the future based on local habitat considerations, stream flows and improved hydrologic and geologic information.

Groundwater sustainability plans are required to take into account the most recent planning assumptions stated in local general plans of jurisdictions overlying the basin. The Eel River Valley basin underlies coastal and inland portions of the unincorporated area as well as the cities of Ferndale, Fortuna, and Rio Dell. In addition, any substantial amendment to a general plan will be required to consider comments from any agency that manages groundwater, and from the State Water Resources Control Board if it has adopted an interim plan for the planning area.

Water Resources and Land Use

The General Plan can help to sustain and enhance water resources. Through its policies and standards, it is an effective tool to ensure that new development occurs without damaging water resources on an individual and cumulative basis. The Plan also serves to guide the County in its interaction with neighboring counties, state, and federal agencies and lawmakers. It also directs the County’s activities and commitment of resources.

State and federal agencies through the California Water Code and Clean Water Act typically have primary jurisdiction over water resource issues, and in those cases their roles do not have to be duplicated by the County. In the event of overlapping jurisdiction or in instances where the County has interests that are distinct from the interests of state and federal agencies, the County will make independent judgments consistent with the policies of this Plan.

Watershed Planning

Humboldt County is part of the State Water Resources Control Board’s Klamath-North Coast Hydrologic Basin Planning Area 1, which includes all basins draining into the Pacific Ocean from the Oregon border southerly through the Russian River Basin. The County’s 12 planning watersheds (see Table 11-A) are displayed in Figure 11-1. For water resource planning purposes and to improve coordination with state and federal agencies, the County uses watersheds as logical planning areas to consider all the activities in a watershed in relation to their **affect effect** on water supply, quality, and biological resources.

North Coast Basin Plan and Beneficial Uses

California’s comprehensive water quality control law, the Porter-Cologne Water Quality Control Act of 1969, requires the adoption of water quality control plans (basin plans) by the state’s nine Regional Water Quality Control Boards to protect water quality and beneficial uses in watersheds within their regions. Basin plans are reviewed every three years and updated as necessary. The Water Quality Control Plan for the North Coast Region, or the North Coast Basin Plan, covers Humboldt, Del Norte, Trinity, Siskiyou, Mendocino, and portions of several other counties.

An essential part of the Basin Plan is an assessment of the beneficial uses that are designated and are to be protected for each hydrologic area in the region. Beneficial uses include the use of water for public water supplies; protection and propagation of fish, shellfish, and wildlife; recreation in and on the water; agriculture; industrial; and other purposes, including navigation. Beneficial uses can either be existing or potential and are enumerated on a uniform list prepared by the State Water Board and are applied throughout all basins of the state.

Controlling sedimentation, preventing further increases in water temperature, preserving flow rates, and monitoring water quality are the chief watershed management challenges in Humboldt County. These challenges may be exacerbated by potential impacts from climate change; impacts include sea level rise, ocean acidification, changes in spatial and temporal distribution of precipitation and temperature—e.g. more frequent intense storms may lead to more severe sedimentation than without climate change. As of 2008, Humboldt County has 19 river segments or water bodies that require Total Maximum Daily Load (TMDL) pollution prevention plans because of their “impaired” designation under Section 303(d) of the federal Clean Water Act (see text box for a description of the TMDL rules). Major soil-disturbing activities include road building, logging, vegetation clearing, over-grazing, mining, and certain agricultural practices. Accelerated erosion and sedimentation can increase flooding and damage riparian habitat. Temperature is an important habitat requirement for salmon and steelhead. High water temperatures result from reduced flows, degraded stream channels and removal of riparian vegetation along watercourses.

Watershed	Basin	Total Acres within County	Total Acres
Lower Klamath	Klamath-Trinity	332,787	493,453
Lower Trinity	Klamath-Trinity	192,286	654,967
South Fork Trinity	Klamath-Trinity	73,205	596,497
Redwood Creek	Mad-Redwood	187,788	187,819
Trinidad	Mad-Redwood	83,684	83,684
Mad River	Mad-Redwood	221,337	322,143
Eureka Plain	Mad-Redwood	124,617	124,617
Van Duzen	Eel	234,899	274,083
Lower Eel	Eel	191,052	191,052
Middle Main Eel	Eel	138,509	333,345
South Fork Eel	Eel	200,395	441,213
Cape Mendocino	Mattole	311,774	319,628
Total		2,292,332	4,039,132

Humboldt County’s watersheds typically flow with an abundance of water in the winter and spring but limited water in the summer and fall, making both flooding and low-flow shortages significant water management issues. For example, the Mattole River has a maximum-recorded winter discharge in excess of 90,000 cubic feet per second and a typical summer flow of less than 20 cubic feet per second.

Figure 11.1: Humboldt County Planning Watershed Areas



Humboldt County watersheds are within the National Marine Fisheries' Southern Oregon/Northern California Coast Salmon and Steelhead Recovery Domain and are a part of Five Counties Salmonid Conservation Program (5C's Program). Recovery of Coho and Chinook salmon, and steelhead populations is a priority of numerous governmental agencies, local tribes and private businesses and organizations from forest product companies to local watershed groups. The 5C's Program has implemented programs to replace culverts, reduce soil loss and erosion, and define best management practices for road maintenance. The County has replaced approximately one-third of the significant barriers to fish migration so far.

Humboldt County is also a participating member of the North Coast Integrated Regional Water Management Plan (NCIRWMP). The NCIRWMP covers a seven county area corresponding to the Regional Water Quality Control Board Region 1 boundary. This collaborative planning framework was selected because impacts to fisheries and other beneficial uses may occur from local land use decisions and actions, but the effects can be cumulative across large geographic areas, with effective solutions often requiring a watershed approach and ultimately a regional approach that can be adopted and implemented by many stakeholders. The NCIRWMP provides an organized framework for identifying local and regional issues, evaluating water management planning objectives and strategies, and implementing the most promising approaches and projects across the region. Many policies and principles of the NCIRWMP have been integrated into this Water Resources Element.

Total Maximum Daily Load (TMDL)

The federal Clean Water Act (CWA) requires states to develop a list of their impaired waterbodies. Impaired waterbodies are those that do not meet water quality standards even after pollution controls for point sources of pollution are in place, such as wastewater treatment plants and industrial facilities. The CWA also requires states to establish priority rankings for waters on the 303(d) list and develop Total Maximum Daily Loads (TMDLs) for these waters based on their individual priority ranking.

A TMDL is a pollution budget for a specific waterbody (river, stream, lake, etc) that identifies the maximum amount of a pollutant (sum of allowable pollutant loads from point and nonpoint sources) that can be released without causing the waterbody to become impaired. A TMDL also must include a margin of safety to allow for any uncertainties in the scientific methods used to derive the TMDL (water quality modeling assumptions, etc.)

Public Water Supply

Municipal water supplies are provided primarily from surface water sources by four water service districts, along with several cities and numerous community service districts.

The Humboldt Bay Municipal Water District provides the majority of drinking water within the County. It supplies treated drinking water to seven municipal agencies, who in turn serve all communities in the greater Humboldt Bay region. The District also delivered large volumes of water to two pulp mills for industrial purposes; however both pulp mills have ceased operation. The District currently has 40 - 45 million gallons per day (MGD) of water available beyond which is needed for its municipal customers. If this water is not used, the District will eventually lose a substantial portion of its water rights which have been granted by the State, and those rights would be available to any other interested party. This additional supply is an asset for the area and could support new agricultural, commercial and industrial development. If such uses do not materialize within Humboldt County, the District could transport available water to another public agency for an

authorized public use, thereby maintaining local control of its water rights, and generating additional revenue for the benefit of its municipal customers and local ratepayers. The District could also allocate a portion of the available water for an instream flow dedication in the Mad River for the purpose of preserving or enhancing habitat or fish and wildlife resources.

Protection of water quality in the watersheds that are sources for municipal water is important to maintaining these supplies. Threats include discharge from sewage treatment plants, failing septic systems, non-point source urban pollution, and turbidity from sediment discharge.

Rural water supplies are provided by private water associations or from on-site surface and groundwater sources. Some rural parcels have been created that cannot support residential usage based on on-site water availability, so availability must be determined on a case-by-case basis. Another concern is the cumulative effects of surface and groundwater withdrawals in rural areas where allowed land uses, if fully developed, would require more water than what is locally available during low-flow periods.

Water storage and water conservation techniques can be solutions to the extremes of water availability. Increased municipal storage in urbanized areas and off-channel water storage in rural areas can increase water security and maintain essential flows for habitat purposes.

Water Exports

The amount of water exported from North Coast watersheds is perhaps the county's most significant water resource policy issue. Diversions of water on the Trinity, Klamath, and Eel rivers have significantly affected water quality, quantity, and beneficial uses within Humboldt County. As a County of origin, the County of Humboldt has certain rights pursuant to state water law. Water Code Section 10505 provides that no water right will be released or assigned for any application that would deprive the County of origin of any water necessary for the development of the County. Section 11460 provides that state water projects must meet standards that protect existing beneficial needs of the watershed. Because of the importance of river flows to the county's economy and environment, the General Plan includes policies that actively pursue reductions in water exports from the Klamath, Trinity and Eel rivers and provide standards for the protection of water quality, fisheries, and habitat for any proposed new water export projects. The Humboldt Bay Municipal Water District is evaluating the feasibility of transferring a portion of its available water from the Mad River using the District's existing water rights and infrastructure to another municipal agency. Such a transfer would not constitute an export in the same manner that other water diversions do. There would be no upstream out-of-basin transfer from one watershed to another. Water available for a transfer would come from the natural discharge of the Mad River and releases from Ruth Lake which flow down the Mad River to the District's existing point-of-diversion at Essex. This option could preserve local control of water rights and bring water revenue into the County.

Stormwater

Communities with County stormwater infrastructure include McKinleyville; the areas surrounding Eureka, including Cutten, Ridgewood, Pine Hill, and Humboldt Hill; and Shelter Cove. Other areas with minor amounts of drainage infrastructure include Redway, Manila, King Salmon, Loleta, Garberville, and Willow Creek.

The State Water Resources Control Board regulates storm water discharges from certain small municipal separate storm sewer systems (MS4s) in accordance with the Phase II storm water program authorized by the federal Clean Water Act. The purpose of the Phase II small MS4 General Permit is to control the discharge of pollutants to storm sewer systems which ultimately drain to natural waterways.

The Phase II Small MS4 General Permit applied to McKinleyville starting in 2006. In February 2013, the State Water Board made significant revisions to the permit requirements and expanded the coverage areas to include the unincorporated Eureka area and Shelter Cove. The revised Phase II Small MS4 General Permit requires a variety of program elements which are phased in over the five-year term of the permit. Compliance dates range from June 30, 2014, to June 30, 2018.

In addition to controlling storm water runoff from construction sites, the County will need to develop a new "post-construction" storm water management program to ensure compliance with source control measures, low impact development (LID) design standards, and hydromodification standards specified in the Phase II Small MS4 General Permit. Other requirements include illicit discharge detection and elimination; water quality monitoring; pollution prevention at County operations; public education and outreach; and program effectiveness evaluation.

Public Works will continue to administer the County's overall implementation efforts for compliance with the Phase II Small MS4 General Permit. The construction site storm water runoff program and post-construction storm water management program will be implemented in conjunction with the Building and Planning Department. New requirements will be adopted by ordinance.

11.4 Goals and Policies

Goals

- WR-G1. Water Supply, Quality, and Beneficial Uses.** High quality and abundant surface and groundwater water resources that satisfy the water quality objectives and beneficial uses identified in the Water Quality Control Basin Plan for the North Coast Region.
- WR-G2. Water Resource Habitat.** River and stream habitat supporting the recovery and continued viability of wild, native salmonid and other abundant coldwater fish populations supporting a thriving commercial, sport and tribal fishery.
- WR-G3. Planning, Coordination, and Advocacy.** A system of local coordination and intra-regional cooperation to advance local, regional, and state water management priorities and objectives.
- WR-G4. Watershed Planning Framework.** Land use decision making that makes use of watersheds as a planning, management, and coordinating framework to cooperatively manage water and natural resources with local communities, neighboring counties, and state and federal agencies.
- WR-G5. Watershed Management.** A system of water resource management that recognizes watersheds as natural systems producing multiple economic,

social, and environmental benefits that can be sustained in perpetuity and optimized with education, sound data, cooperative public processes, adaptive management, and science based leadership.

- WR-G6. Public Water Supply.** Public water systems able to provide adequate water supply to meet existing and long-term community needs in a manner that protects other beneficial uses and the natural environment.
- WR-G7. Effective Conservation Strategies.** Effective application of conservation, water re-use, and low impact storage strategies such as rainwater catchment in meeting year-round water supply needs.
- WR-G8. Restoration of Impacted River Flows.** Restoration of water flow regimes in the Trinity, Klamath, Eel, and other rivers systems impacted by out of basin water diversions to meet all beneficial uses, including salmon and steelhead recovery plans, recreational activities, and the economic needs of river dependent communities with no additional watershed exports from rivers flowing through the County that are detrimental to beneficial uses.
- WR-G8x1. Restored Water Quality and Watersheds.** All water bodies de-listed and watersheds restored, providing high quality habitat and a full range of beneficial uses and ecosystem services.
- WR-G9. Storm Drainage.** Storm drainage utilizing onsite infiltration and natural drainage channels and watercourses, while minimizing erosion, peak runoff, and interference with surface and groundwater flows and storm water pollution.
- WR-GX. Wastewater Management.** Individual wastewater systems that do not contaminate surface and ground water.

Policies

Water Resources and Land Use

- WR-P1. Sustainable Management.** Ensure that land use decisions conserve, enhance, and manage water resources on a sustainable basis to assure sufficient clean water for beneficial uses and future generations.
- WR-P2. Protection for Surface and Groundwater Uses.** Impacts on Basin Plan beneficial water uses shall be considered and mitigated during discretionary review of land use permits that are not served by municipal water supplies.
- WR-P3. Proactive Protections.** Focus regulatory attention and educational efforts in specified watersheds where limited water supply or threats to water quality have potentially significant cumulative effects on the availability of water for municipal or residential water uses or the aquatic environment.
- WR-P4. Critical Municipal Water Supply Areas.** The Board of Supervisors shall designate all or portions of watersheds as "Critical Water Supply Areas" if cumulative impacts from land uses within the area have the potential to significantly impact the quality or quantity of municipal water supplies. Water

resources within Critical Water Supply Areas shall be protected by the application of specific standards for such areas.

- WR-P5. Critical Watershed Areas.** The Board of Supervisors shall designate all or portions of watersheds as "Critical Watersheds" if cumulative impacts from existing or planned land and water resource uses within the area have the potential to create significant environmental impacts to threatened or endangered species; including Chinook salmon, coho salmon or steelhead. Land and water resources within Critical Watersheds shall be protected by the application of specific standards for such areas to avoid the take of threatened or endangered species.
- WR-P6. Subdivisions-Water Supply.** Any subdivision of land shall be conditioned to require evidence of sufficient water supply during normal and drought conditions to meet the projected demand associated with the proposed subdivision. Sufficient water supply shall include the requirements of the proposed subdivision and existing and planned future uses. Written service letters from a public water system written in conformance with this policy is sufficient evidence. Subdivisions to be served through on-site water supplies or private water systems must provide evidence of sufficient water supply to the County Department of Environmental Health.
- WR-Pxx. Funding.** Coordinate with local, state and federal agencies, and conservation and watershed restoration related organizations, to identify and obtain sources of funding for water quality enhancement, fish passage projects, stormwater pollution management, and water conservation efforts.
- WR-Px1. Requirements for Water Storage in Flow Impaired Watersheds.** New development not served by a public water system that seeks to rely upon surface water shall install water storage capable of providing 100 percent of the necessary water storage volume for the summer low-flow season (e.g. July-August-September). A forbearance agreement prohibiting water withdrawals during low-flow season shall be included as a performance standard for the project.
- WR-Px2. Mitigate Controllable Sediment Discharge Sites.** Discretionary development involving a site identified as part of the TMDL Controllable Sediment Discharge Inventory shall be conditioned to mitigate sediment.
- WR-P8. Erosion and Sediment Discharge.** Ministerial and discretionary projects requiring a grading permit shall comply with performance standards adopted by ordinance and/or conditioned to minimize erosion and discharge of sediments into surface runoff, drainage systems, and water bodies consistent with best management practices, adopted Total Maximum Daily Loads (TMDLs), and non-point source regulatory standards.
- WR-P9. County Facilities Management.** Design, construct, and maintain County buildings, roads, bridges, drainages, and other facilities to minimize erosion and the volume of sediment in stormwater flows.
- WR-P10. Project Design.** Development should be designed to compliment and not detract from the function of rivers, streams, ponds, wetlands, and their setback areas.

- WR-P11. Small and Micro Hydroelectric.** Encourage small and micro hydroelectric development when impacts to surface water flows, aquatic species, and habitat have been adequately mitigated and are in conformance with state and federal permits and standards.
- WR-P12. Groundwater Quality Protection.** Commercial and industrial discretionary uses shall be evaluated for their potential to contaminate groundwater resources, and mitigated as necessary.
- WR-P13. Saltwater Intrusion.** Discretionary projects involving groundwater withdrawals in proximity to coastal areas with a potential to create saltwater intrusion shall demonstrate that groundwater supplies will not be adversely affected by saltwater intrusion.
- WR-P14. Pathogen and Nutrient Discharge from Septic Systems.** Support programs that reduce coliform bacteria and nitrate discharges from septic systems.
- WR-P15. Nutrient Discharge from Agricultural Operations.** Support programs that reduce nutrient discharge from agricultural operations, such as the voluntary manure management programs used by local dairies.
- WR-P16. State and Federal Regulation.** Encourage state and federal agencies to maintain responsibility for water resources supply and water quality management. The County shall not accept administrative responsibility for state or federal regulatory programs unless sustainable funding sources are secured.
- WR-Px6. Alternative Disposal Systems.** Support programs and ordinance revisions that modify the permit process for alternative disposal systems to make such systems more accessible to individual households under conditions that do not threaten the public health.
- WR-Px7. Rain Catchment Systems.** Encourage the installation of rain catchment systems to support domestic and outdoor water needs during low-flow summer months.

Watershed Planning

- WR-P17. Watershed Planning.** Use watersheds as the geographic planning framework for water resource planning and coordination with other regional, state, and federal planning, implementation, and funding efforts. Maintain relevant land use data on watershed basis to support watershed based management and decision-making processes. Encourage and support continued research, investigation, and analysis of the County's water resources by federal and state water resource agencies, and local watershed restoration groups. Encourage compilation of data, such as the State Water Resources Control Board's water allocation data, the National Marine Fisheries Services and Department of Fish and Wildlife coho recovery plans, on a watershed basis.
- WR-P18. Watershed and Community Based Efforts.** Support the efforts of local community watershed groups to protect, restore, and monitor water resources and work with local groups to ensure decisions and programs take into account local priorities and needs.

- WR-P19. Regional Water Management Planning.** Work on a regional basis through the North Coast Resource Partnership (NCRP) to ensure coordination and adaptive management between statewide water resource planning efforts, regional priorities, and local needs. The goals and objectives identified in the North Coast Integrated Regional Water Management Plan shall be considered in establishing County water resource priorities and policy positions.
- WR-P20. State and Federal Watershed Initiatives.** Support implementation of state and federal watershed initiatives such as the Total Maximum Daily Loads (TMDLs), the North Coast Regional Water Quality Control Board's (NCRWQCB) Watershed Management Initiative, the National Marine Fisheries Services and Department of Fish and Game coho recovery plans and the California Non-Point Source Program Plan.

Public Water Supply

- WR-P21. Sufficient Water Supply.** Support the actions and facilities needed by public water systems to supply the water demands projected in this Plan.
- WR-P22. Critical Water Supply Areas.** Coordinate with public water systems in the designation and regulation of water resources in Critical Water Supply areas.
- WR-P23. Conservation and Re-use Strategy.** Promote the use of water conservation and re-use as a strategy to lower the cost, minimize energy consumption, and maximize the overall efficiency and capacity of public and private water systems. Encourage the installation of water storage, rain catchment and graywater systems to support domestic and outdoor water needs. Encourage and support conservation for agricultural activities that increase the efficiency of water use for crop irrigation and livestock. Support the use of treated water for irrigation, landscaping, parks, public facilities, and other appropriate uses and coordinate with cities and other wastewater treatment entities in planning uses and minimizing impacts for treated water in unincorporated areas. Avoid water reuse that could adversely affect the quality of groundwater or surface water.

Water Exports

- WR-P24. Restoration of Flow Rates.** The County shall advocate for reductions in water exports and improved flow release from existing reservoirs on the Trinity, Klamath and Eel rivers to restore and enhance fisheries, natural sediment transport, water quality, recreational opportunities, and other beneficial uses as identified in the Basin Plan.
- WR-P25. New Water Diversion Projects.** Review and make recommendations on significant new water diversion projects to ensure that they do not reduce the replenishment rate of in-stream gravel, taking into account the impact the projects would have on local mineral supplies in Humboldt County.
- WR-P26. Impact Analysis.** All new export proposals and renewal of licenses for existing water exports shall include a full assessment of impacts on the environment, economy, and water supply needs of the county.

- WR-P27. County Needs.** Any consideration of exporting additional water resources shall place primary priority upon the benefit of and need for the water resources in the county and shall ensure that water needed by water users and natural resources will not be exported outside the county.
- WR-P28. Public Trust Resources and Interests.** The County shall advocate that dam relicensing projects redress the historical over-emphasis on development values (electric power, flood control, and water supply) at the expense of non-developmental values (environmental resource protection, habitat restoration, and water quality).
- WR-P29. Public Input.** The County shall advocate for the relicensing applicant to sponsor a participatory process involving all affected stakeholders prior to the submittal of a final relicensing application to the Federal Energy Regulatory Commission.
- WR-P29x Implementation of NPDES Permit.** Implement and comply with the National Pollutant Discharge Elimination Systems (NPDES) Permit issued by the State Water Resources Control Board to the designated portions of the County.

Stormwater Drainage

- WR-P30. Natural Stormwater Drainage Courses.** Natural drainage courses, including ephemeral streams, shall be retained and protected from development impacts which would alter the natural drainage courses, increase erosion or sedimentation, or have a significant adverse effect on flow rates or water quality. Natural vegetation within riparian and wetland protection zones shall be maintained to preserve natural drainage characteristics consistent with the Biological Resource policies. Stormwater discharges from outfalls, culverts, gutters, and other drainage control facilities that discharge into natural drainage courses shall be dissipated so that they make no significant contribution to additional erosion and, where feasible, are filtered and cleaned of pollutants.
- WR-P31. Downstream Stormwater Peak Flows.** Peak downstream stormwater discharge shall not exceed the capacity limits of off-site drainage systems or cause downstream erosion, flooding, habitat destruction, or impacts to wetlands and riparian areas. New development shall demonstrate that post-development peak flow discharges will mimic natural flows to watercourses and avoid impacts to Beneficial Uses of Water.
- WR-P32. New Drainage Facilities.** Where it is necessary to develop additional drainage facilities, they shall be designed to be as natural in appearance and function as is feasible. All drainage facilities shall be designed to maintain maximum natural habitat of streams and their streamside management areas and buffers. Detention/retention facilities shall be managed in such a manner as to avoid reducing streamflows during critical low-flow periods.
- WR-P33. Restoration Projects.** The County shall encourage restoration projects aimed at reducing erosion and improving habitat values in Streamside Management Areas and wetlands.

- WR-P34. Commercial and Industrial Activities.** Commercial and industrial activities shall minimize, and eliminate to the extent feasible, facility-related discharges to the stormwater system. As required by state codes and local ordinances, commercial and industrial stormwater discharge must be routed to a wastewater collection system; for example, minimizing runoff from vehicle maintenance yards, car washes, restaurants cleaning grease, contaminated mats/carts into storm drains, and other wash practices that result in materials other than plain water entering the storm drain system.
- WR-P35. Oil/Water Separation.** Parking lot storm drainage shall include facilities to separate oils from stormwater in accordance with Public Works requirements and the recommendations of the Stormwater Quality Association's California Stormwater Best Management Practices Handbooks or their equivalent.
- WR-P36. Erosion and Sediment Control Measures.** Incorporate appropriate erosion and sediment control measures into development design and improvements.
- WR-P37. Storm Drainage Design Standards.** Drainage design standards for new development shall be adopted by ordinance. The design standards shall ensure that storms of specified intensity, frequency, and duration can be accommodated by engineered drainage systems and natural drainage courses.
- WR-P38. Storm Drainage Impact Reduction.** Develop and require the use of Low-Impact Development (LID) standards consistent with Regional Water Board requirements to reduce the quantity and increase the quality of stormwater runoff from new development and redevelopment projects in areas within the County's MS4 boundary or as triggered under other Regional Water Board permits. For all other watersheds, develop storm drainage development guidelines with incentives to encourage LID standards to reduce the quantity and increase the quality of stormwater runoff from new developments.
- WR-P39. Reduce Toxic Runoff.** Minimize chemical pollutants in stormwater runoff such as pesticides, fertilizers, household hazardous wastes, and road oil by supporting education programs, household hazardous waste and used oil collection, street and parking lot cleaning and maintenance, use of bio-swales and other stormwater best management practices described in the California Stormwater Best Management Practices Handbooks or their equivalent.
- WR-P40. Fish Passage Designs.** Work with federal and state agencies and local watershed restoration groups to retrofit existing drainage and flood control structures and design new structures to facilitate fish and other wildlife passage in partnership with federal and state agencies.

11.5 Standards

Water Resources and Land Use

- WR-S1. Designation of Critical Water Supply and Watershed Areas.** The designation by the Board of Supervisors of Critical Water Supply and Watershed Areas shall be a public process, involving a recommendation from the Planning

Commission and input from the public, affected water providers, and state and federal agencies.

- WR-S2. Development within Critical Water Supply Areas.** Ministerial land use development proposed within Critical Water Supply areas shall comply with performance standards adopted by ordinance. Discretionary development within the Critical Water Supply Areas shall comply with performance standards and supplemental permit conditions. Standards and permit conditions shall require: 1) demonstrating that risk of contamination to the water supply as a result of the development activity is minimized by providing mitigation to avoid significant adverse effects; and 2) avoiding degradation of municipal water supplies by reducing cumulative impacts to surface water quality and water quantity during low-flow periods to below levels of significance.
- WR-S3. Development within Critical Watershed Areas.** Ministerial land use development proposed within Critical Watershed Areas shall comply with performance standards adopted by ordinance. Discretionary development shall comply with performance standards and supplemental permit conditions. Standards and permit conditions shall avoid take of endangered or threatened species by reducing cumulative impacts to aquatic habitat to below levels of significance.
- WR-S5. Water Withdrawal Permitting.** Ministerial and discretionary permits for land use development that include development of new in-stream water sources or other streambed alterations subject to California Fish and Game Code Section 1602 shall provide evidence of, or be conditioned to obtain a Streambed Alteration Agreement from the Department of Fish and Game as well as a Water Right Permit or a small scale domestic use registration from the State Water Board.
- WR-S6. Subdivisions Demonstration of Sufficient Water Supply.** Demonstration of sufficient water supply shall include the requirements of the proposed subdivision, existing uses, and planned future uses. Subdivisions for residential development subject to state requirements of SB 610 and SB221 shall make the appropriate demonstrations consistent with regulations (as amended) established by these acts. Written service letters from a public water system written in conformance with this policy is sufficient evidence. Subdivisions to be served through on-site water supplies or private water systems must provide evidence of sufficient water supply to the County Department of Environmental Health.
- WR-S7. Total Maximum Daily Loads (TMDLs) Implementation.** Discretionary development within watersheds containing impaired water bodies as defined under Section 303(d) of the federal Clean Water Act and governed by TMDL implementation plans shall be conditioned to reduce or prevent further impairment consistent with applicable TMDLs.
- WR-S8. Erosion and Sediment Discharge.** Ministerial and discretionary projects shall conform to grading ordinance standards for erosion and sediment control.
- WR-S9. County Facilities Management.** The design, construction, and maintenance of County roads, bridges, drainages, and other facilities shall minimize

stormwater runoff erosion and discharge of sediments and other pollution by following best management practices in accordance with the Five County Water Quality and Stream Habitat Protection Manual for County Road Maintenance in Northwestern California Watersheds (5C's Manual) or its equivalent.

- WR-S10. Projects in Proximity to Wild and Scenic Rivers.** Projects located within state designated wild, scenic, or recreational river basins shall be consistent with the guidelines in the State Wild and Scenic Rivers Act as amended.
- WR-S11. Micro Hydroelectric.** Development of run-of-the-river micro hydroelectric projects on privately owned lands are considered accessory to allowed uses if they are sized to meet the electrical demands of the subject property only and designed to avoid impacts to streamflow and fisheries.

Water Exports

- WR-S12. Water Export Projects on Humboldt County Rivers.** The Humboldt County Board of Supervisors will require the following information to demonstrate the export project's adherence to the requirements of California Water Code Section 10505 protecting development rights and Section 11460 protecting beneficial needs of the watersheds. The analysis of the export project shall include:
- A. Effects on in-stream flows including flood events.
 - B. Assessment of the environmental impact of the proposed project using appropriate ecological studies by a team of independent experts, qualified to conduct such studies, funded by the project sponsor and completed before project authorization.
 - C. Effects on fisheries and native wildlife habitat and restoration efforts. Analysis of the sustainability of any proposed fisheries and wildlife habitat mitigations.
 - D. Impacts to Native American communities, including cultural and archaeological resources, economies, fisheries, and water supplies.
 - E. Water supplies necessary to meet the ultimate future development needs of residential, agricultural, municipal, industrial, and recreational users and to promote environmental protection and fisheries habitat restoration.
 - F. Cost and benefits to recreation.
 - G. Water quality impacts and provisions for enhancement of any impaired water bodies (Section 303(d) of the federal Clean Water Act).
 - H. Property tax and other fiscal or economic losses to local entities.
 - I. Public infrastructure and service demands and costs including roads and recreation facilities.
 - J. Public cost and benefits on statewide, regional, county, and local scales including the monetized value of impacted ecological services.

- WR-S13. Minimizing Effects of Water Exports.** The County shall prevent water exports from damaging the county's environmental and economic setting by ensuring that "no unreasonable effect" occurs in the transfer and withdrawal of water resources pursuant to Section 1810 of the State Water Code. County standards for defining "no unreasonable effect" include actions that will not:
- A. Contribute to a decline in, or interfere with the recovery of, the population of any sensitive or protected plant, fish, or wildlife species.
 - B. Reduce water levels in any existing public or private groundwater wells to levels that preclude withdrawal by existing users or would substantially increase the costs or such withdrawal.
 - C. Contribute to any impacts on water quality that reduces water quality below health standards or federal or state water quality standards.
 - D. Contribute to effects on water quality that would result in a deficiency by the water treatment agency's ability to treat water to appropriate standards.
 - E. Reduce available groundwater or surface water resources to levels that would make access and/or use of these waters uneconomical for development planned in accordance with this General Plan.
 - F. Directly or indirectly discharge contaminants into surface or groundwater resources.

Stormwater Drainage

- WR-S14. Storm Water Management.** All commercial, industrial, multi-family, quasi-public, and public parking facilities shall, whenever possible, provide stormwater treatment for parking lot runoff using bio-retention areas, filter strips, and/or other practices that be integrated into required landscaping areas and traffic islands. In all other cases, oil/water separators shall be required. A maintenance plan for oil/water separators shall be required. During construction, the following erosion and sediment control measures shall be incorporated into development design and improvements:
- A. Minimize soil exposure during the rainy season by proper timing of grading and construction;
 - B. Retain natural vegetation where feasible;
 - C. Vegetate and mulch denuded areas to protect them from winter rains;
 - D. Divert runoff from steep denuded slopes and critical areas with barriers or ditches;
 - E. Minimize length and steepness of slopes by benching, terracing, or constructing diversion structures;
 - F. Trap sediment-laden runoff in basins to allow soil particles to settle out before flows are released to receiving waters; and
 - G. Inspect sites prior to significant rain events to ensure control measures are working properly and correct problems as needed.

11.6 Implementation Measures

Water Resources and Land Use

- WR-IM1. Critical Water Supply and Watershed Area Ordinance.** Prepare and adopt an ordinance to implement Critical Water Supply and Watershed Area policies.
- WR-IM2. Critical Water Supply and Watershed Area Designation.** Identify and designate Critical Water Supply and Watershed Areas through a zoning overlay process using best available scientific data, consultation with municipal water suppliers and resource agencies, and public outreach and input.
- WR-IM3. Require Restoration of Degraded Areas.** Require replanting of vegetation and remediation of erosion conditions in conjunction with related discretionary land use approvals, especially those including roads and grading on steep slopes.
- WR-IM4. County Facilities.** The Department of Public Works shall manage and conduct internal reviews of County construction and maintenance activities to ensure conformance with adopted best management practices for erosion and sediment control.
- WR-IM5. Septic Systems.** Actively pursue the abatement of failing septic systems that have been demonstrated to represent a health and safety hazard.
- WR-IM6. Permitting Coordination.** The County shall maintain efficient and timely procedures for project referral to the North Coast Regional Water Quality Control Board for review and consultation.
- WR-IM7. Basin Plan Septic Requirements.** Update and amend existing County septic regulations to reflect the latest Basin Plan standards for design and maintenance of on-site wastewater systems.
- WR-IMx. Graywater Re-use Standards.** Update and amend the existing County Code to implement the revisions to the State California Plumbing Code, Title 24, Part 5, Chapter 16A regarding Graywater Standards, as reflected in SB1258.
- WR-IMx1. Update Water Quality Regulations.** Amend the Grading, Excavation, Erosion, and Sedimentation Control Regulations and Division 1, Planning Zoning Regulations Chapter 6 - General Provisions and Exceptions Section 314-61.1 Streamside Management Area Ordinance to reflect the new erosion, sediment control, vegetation, restoration, and stormwater drainage policies and standards contained in the Water Resources Element, and the Biological Resources Chapter of the Conservation and Open Space Elements and evaluate as part of the five-year Housing Element Update to determine if additional measures are needed to protect water quality.
- WR-IMx2. Unpermitted Development Ordinance for Critical Watersheds.** Prepare an ordinance to provide enforcement capabilities for un-permitted

development within critical watershed areas if the development impacts water resources. Work with the State Departments of Water Resources and California Department of Fish and Wildlife to address illegal water diversions and over-subscribed water right allocations.

Watershed Planning

- WR-IM8. Watershed Planning.** The County shall maintain relevant land use data on a watershed basis to support watershed based management and decision-making processes.
- WR-IM9. North Coast Integrated Regional Water Management Planning.** The County shall participate in the continued update and implementation of the North Coast Integrated Regional Water Management Plan.
- WR-IM10. TMDL Controllable Sediment Discharge Inventory and Reduction Program.** Map impaired water bodies as defined under Section 303(d) of the federal Clean Water Act with associated impairment parameters, water quality objectives, and pollution budgets contained in TMDL implementation plans. Seek funding to identify controllable sediment discharge sites and establish a program to prioritize, treat, monitor, and subsequently reevaluate such sites.
- WR-IM11. Watershed Data.** Seek and secure funding to evaluate the quality and quantity of water resources in each of the watershed basins. Support studies that correlate the quality and quantity of water captured, stored, and contained within watersheds to the needs of beneficial water uses by residents, local industry, agriculture, and the natural environment. Identify and map important groundwater recharge areas.
- WR-IM12. Sustainable Groundwater Plans.** Support the development of Sustainable Groundwater Plans consistent with California Water Code.
- WR-IM13. Water Planning and Coordination.** Actively encourage and participate in local and state water resource planning efforts that have the potential to achieve Water Resource Element goals.
- WR-IM14. Watershed Planning with Public Land Managers.** Participate in the planning activities of federal and state land management agencies to advocate for watershed-based planning and management approaches and policies and projects that are consistent with Water Resource Element policies.
- WR-IM15. Coordinate and Support Watershed Efforts.** Seek funding and work with land and water management agencies, community-based watershed restoration groups, and private property owners to implement programs for maintaining and improving watershed conditions that contribute to improved water quality and supply.
- WR-IM16. Basin Plan.** Work cooperatively with the North Coast Regional Water Quality Control Board and other interested parties in the update and implementation of Basin Plan policies and programs.

WR-IM17. Water Resources Funding. Work with public water suppliers, utility districts, stakeholder groups, and interested parties to seek and secure outside funding sources to implement this Element.

WR-IM18. Facility Construction. Coordinate with public water suppliers in the planning, development, and construction of the storage and transmission facilities needed to supply water pursuant to this Plan's policies, urban water management plans, water supply agreements, municipal service reviews, and programs to mitigate identified water quantity conditions, where applicable.

WR-IM19. Climate Change: Coordinate with State agencies on identifying climate change impacts and developing adaptation options. In particular, consult *Safeguarding California*¹ and keep abreast of other actions taken by the State under California Public Resources Code, Sections 71350 – 71360.

Public Water Supply

WR-IM19. Water Facilities Consistency with the General Plan. Pursuant to the requirements of California Government Code, Sections 65400-65402, require public water suppliers—including cities, county-dependent districts, special districts, and other local public agencies—to consult with the County prior to acquiring a site or developing any well or facilities for public water supplies in the unincorporated area, by requesting a determination of the proposal's consistency with the General Plan.

WR-IM20. Technical Assistance Water Supply and Quality. Assist public water suppliers in the assessment of available water supplies and protection of water quality.

WR-IM21. Long-term Water Supply Planning. Work with Humboldt Bay Municipal Water District and other public water suppliers in the development and implementation of long-term plans for water supply, storage, and delivery necessary to first meet existing water demands and, secondly, to meet planned growth within the designated service areas, consistent with the sustainable yield of water resources.

WR-IM22. Promoting Water Conservation and Re-use. Encourage water conservation and re-use practices by providing information resources for permit applicants on:

- A. Water-conserving design and equipment in new construction.
- B. Water conserving landscaping and other land management practices.
- C. Water conserving retrofit options for existing buildings.
- D. Residential water re-use options including graywater systems.
- E. Off-stream water storage systems including tanks and ponds.

WR-IM23. Urban Water Management Plans. Review and comment on Urban Water Management plans (California Water Code Sections 10610–10656) prepared by urban water suppliers.

Importing and Exporting

¹

WR-P24. Restoration of Flow Rates. The County shall actively participate in decision-making processes that affect water flows in the Trinity, Klamath, Eel, Mad and Van Duzen rivers to advocate for the goals and policies of this Plan.

Storm Drainage

WR-IM25. Drainage Ordinance. The County shall develop and maintain an ordinance that regulates stormwater drainage consistent with the policies and standards of the Element.

WR-IM26. Low Impact Development Methods. Require projects to utilize best management practices for Low Impact Development to meet surface water run-off standards.

WR-IM27. Nutrient Discharge from Agricultural Operations. Seek funding and support voluntary manure management programs.

Chapter 14. Safety Element

14.1 Purpose

The purpose of the Safety Element is to reduce the risk of death, injuries, property damage, and economic and social dislocation resulting from earthquake, fire, flood, and other hazards. The components of this element include:

- Geologic/Seismic Hazards
- Flooding and Drainage
- Fire Hazards
- Airport Safety
- Industrial Hazards
- Emergency Management

This Element identifies hazards and hazard abatement provisions to guide local decisions related to zoning, subdivisions, and entitlement permits. Hazard and risk reduction policies supporting hazard mitigation implementation measures are contained in this Element.

14.2 Relationship to Other Elements

The hazards discussed in The Safety Element are considered in applying the policies and land use designations of the Land Use Element. For instance, lands subject to recurring flooding are planned for open space uses such as agriculture wherever practical. The Conservation and Open Space, Circulation, Community Infrastructure and Services and Water Resources Elements share common related subject matter.

14.3 Background

Hazard and Risk Reduction

Land development is subject to a number of hazards to life and property, including seismic and non-seismic land instability, flooding, fire, and dangers from airport operations.

The degree of risk associated with these hazards can only be measured in relative terms. What constitutes "acceptable risk" varies with the type of development involved. For instance, a hospital should meet very strict earthquake standards in order to ensure that it is able to function in the event of a serious earthquake. A warehouse, on the other hand, would not need to be designed to the same rigorous standards because its functions during an earthquake would not be critical to the community's response to the emergency, nor would it pose serious risk to large numbers of people should it fail.

Climate change adds an additional concern as a risk multiplier for various hazards such as flooding from more intense storms.

This General Plan manages risk through the use of land use designations to limit exposure to hazardous areas and through policies tailored to specific hazardous conditions. The

implementation measures of this Element are designed to proactively improve overall safety conditions within the county.

Geologic/Seismic Hazards

Humboldt County is a relatively hazardous area in terms of land sliding and soil erosion, and an extremely hazardous area in terms of groundshaking and fault rupture. The following sections briefly describe the seismic setting, bedrock geology, and soils of the county.

Seismicity

Humboldt County is located within two of the highest of five seismic risk zones specified by the Uniform Building Code. The area near Cape Mendocino is a complex, seismically active region, where three crustal plates intersect to form the Mendocino Triple Junction. The area offshore Cape Mendocino has the highest concentration of earthquake events anywhere in the continental United States.

The subducting Gorda and Juan de Fuca Plates form the "Cascadia Subduction Zone," which runs north offshore of Humboldt, Del Norte, Oregon, and Washington. Research shows that this system produced a series of great earthquakes (magnitude 8 to 9) over the last 20,000 years at intervals of 300–500 years. The last great earthquake occurred about 300 years ago.

The above described seismic setting has the potential to cause significant groundshaking, leading to: (1) a serious liquefaction and subsidence hazard, particularly around the muds and sands of Humboldt Bay; (2) a nearshore tsunami striking the coast within 15 minutes of groundshaking; (3) a significant landslide hazard countywide; and, (4) surface fault rupture along the San Andreas, and possibly along the Little Salmon and Mad River fault zones, and other active or potentially active faults in the county. This scenario is Humboldt County's most significant risk. Planning proactively for this risk to protect life, minimize damage to critical infrastructure, and respond in the event of this emergency are high priorities of this Plan.

Surface Fault Rupture

Surface fault rupture is a particular type of seismic hazard that is specifically addressed by state legislation, the Alquist-Priolo Earthquake Fault Zoning Act. This act generally requires disclosure and avoidance. Humboldt County has a number of fault zones mapped under this law. The County utilizes a combining zone designation ("G") to flag these areas where special geologic study is required to identify the precise location of active fault traces to ensure structures for human occupancy are not placed astride them.

Liquefaction and Landsliding

Groundshaking gives rise to two secondary natural hazards, liquefaction and landsliding. Liquefaction involves a sudden loss in strength of a water-saturated soil, and results in temporary transformation of the soil into a fluid mass. Recent alluvial flood plain soils and coastal sand deposits exhibit the highest liquefaction hazard. To mitigate this hazard soils engineering investigations can assess the potential for liquefaction and specify appropriate foundation and building design.

Groundshaking can induce landslides, especially under saturated conditions. Again, soils engineering investigations can evaluate the seismic stability of slopes and prescribe appropriate setbacks.

Active Fault Near-Source Zones

Since 1997, the UBC (Uniform Building Code) requires that in Seismic Zone 4 (most of Humboldt is in this zone) each listed ground motion fault shall be assigned a near-source seismic factor to be used in building design. Applying these factors to building construction substantially increases building strength and, for large multi-story buildings, cost. In Humboldt County, there are "A" and "B" designated fault zones, with "A" zones (including the San Andreas and Little Salmon faults) having more stringent design requirements.

Bedrock Geology

The bedrock geology of the county is divided generally into two provinces: the Klamath Mountains province in the northeast and the Coast Ranges province in the central and southwest portion of the county. The dividing line between the two provinces is the South Fork Mountain Ridge, which separates the Trinity River basin from the Mad River and Redwood Creek drainages.

The Klamath Mountains province is an area of high alpine peaks east of the Humboldt County line. The province is drained by the Klamath and Trinity Rivers and, farther north, by the Smith River. Rocks in the Klamath Mountains province are generally older than those in the Coast Ranges. Rocks of sedimentary origin such as sandstone, chert, slate, and schist occur abundantly, with occasional granite intrusions.

The Coast Ranges province is the dominant geologic province in the county, trending northwest and drained by the Mad, Eel, and Mattole River drainages. The Franciscan and Yager complexes dominate inland, with sand and other alluvial deposits characterizing the lower reaches of the river basins and the area surrounding Humboldt Bay.

The Franciscan complex can be divided into two distinct units: Franciscan sandstone and Franciscan mélangé. Franciscan sandstone consists mainly of sandstone and siltstone. Although this sandstone unit is frequently sheared, there is little evidence of massive rock deformation. Slopes are fairly stable, but subject to debris sliding along steep river banks and in steep headwater drainages.

Franciscan mélangé consists of sheared sandstone and siltstone along with blocks of volcanic rock, chert, and schist. Mélangé terrain is generally unstable and characterized by rolling hummocky slopes that are highly susceptible to mass movement.

The Yager formation is predominantly shale and sandstone. Local shearing occurs but, in general, the formation is much less deformed and more stable than the Franciscan. However, it is subject to debris slides on steep slopes and river banks.

Alluvial sediments dominate the lower reaches of the river basins and in the area surrounding Humboldt Bay. These unconsolidated to partially consolidated sediments have been mildly folded and faulted but, when forested or gently sloped, are generally stable.

Recent advances have been made but the bedrock geology is still poorly mapped in much of the county. In most cases, lack of detailed mapping precludes determining stability without a site investigation. However, it may be valid to conclude varying degrees of relative risk based on general mapping of rock units when averaged over time.

Soils

There are many varied soils in Humboldt County. Some of the more abundant agricultural and lowland soils found in the county are the Ferndale series, a deep, well drained soil formed on recent flood plains; the Bayside and the Loleta series, both deep, poorly drained soils found in depressed areas or on nearly level alluvial fans; and the Rohnerville, Carlotta, and Hookton soils series, all moderately well-drained soils.

Rohnerville soils are found on relatively flat, high marine terraces. The Hookton soils are on sloping, dissected marine terraces and the Carlotta soils are found on flat, low-lying terraces. Most of these agricultural soils are rated 80-100 in the Storie Index of agricultural productivity (good to excellent productivity) except the Bayside soils where drainage problems may reduce agricultural potential.

Forest Soils

In general, the forest soils of the county are medium textured, acid in reaction, and generally increasing in acidity with depth. They are permeable and well drained.

In the lowlands forest soils are formed on alluvial flood plains or low-lying terraces. Here they are either unclassified or of the Carlotta and Ferndale groups. The most superlative old growth redwood groves are found on these soils.

Grassland Soils

The general characteristics of grassland soils vary widely. They range from shallow loamy soils to deep clay soils. Their permeability ranges from moderate to slow. The general nutrient level of these grassland soils is higher than that of the adjacent forest soils. The major portion of these soils is intermingled with other soils in the Douglas fir zone beyond the fog belt. Some of these soils are formed on Franciscan parent material. Many of these are found in the shear zone or fault gouge material or on the mélange material of the Franciscan. This parent material weathers rapidly, forming a grey-blue clay subsoil (commonly called "blue goo") that tends to slip when wet. Thus, because of the parent material, these soils are found in landslide topography.

Woodland Soils

Most of the woodland soils are inland beyond the cool, foggy belt. They are intermingled with the conifer forest soils of the Douglas fir belt and the adjacent grassland soils. These are shallow soils, usually well drained, but permeability may be slow in some locations. The natural nutrient level of these soils tends to be somewhat higher than for the neighboring forest soils. Because the parent material is predominantly Franciscan mélange, these soils can be relatively unstable.

In contrast to the information on the county's bedrock geology, the available soils information is quite detailed. Soil-vegetation maps prepared by the California State Cooperative Soil-Vegetation Survey are available for the county at the 7-1/2 minute

scale. These maps describe vegetation and soils, including information of parent rock materials, soil depth, erosion, and slope.

Slope Stability

Slope stability refers to the landslide susceptibility of slopes composed of natural rock, soils, artificial fill, or combinations thereof. Landslides move along surfaces of separation by falling, sliding, and flowing, giving rise to many characteristic features. The features range in appearance from being clearly discernible, largely unweathered and uneroded, to highly weathered and eroded, recognized only by topographic configurations.

Landslides are characteristically abundant in areas of high seismicity, steep slope, and high rainfall, but may be triggered by any, or a combination, of the following: (1) type and structure of earth materials, (2) steepness of slope, (3) water, (4) vegetation, (5) erosion, and (6) earthquake-generated groundshaking.

The prediction of slope failure at a specific site, therefore, requires an analysis of all possible factors. As part of the County General Plan, relative slope stability maps have been prepared to show areas susceptible to sliding.

Flooding and Drainage Management

This section examines four aspects of flood-related hazards: river flooding, dam failure, coastal high water, and drainage management.

River Flooding

The 1955 and 1964 floods caused extensive damage along the Eel, Mad, and Trinity Rivers. Damages from the 1964 flood alone totaled \$100 million. Flood prone areas have been mapped by the Federal Emergency Management Agency (FEMA). The maps provide the basis for regulating flood plains in conformance with the National Flood Insurance Program. The County has adopted flood plain regulations in order to continue participation in the federal flood insurance program.

Dam Failure

While providing some degree of flood control, dams also present a possible hazard in the event of failure. Trinity Dam and Ruth Dam pose the most substantial risk, with their large volumes and, in the event of a failure, short downstream warning times.

Hazards from dam failure are those associated with the downstream inundation that would occur given a major structural failure of a nearby impoundment. Such failures would most likely be caused by geologic phenomena, including seismic events and slope stability problems.

Five dams are located in adjacent counties on rivers that drain into Humboldt County and the failure of any one of these structures could significantly impact this county. The County maintains emergency response plans for the Trinity, Ruth (Matthews), Scott, Copco, and Iron Gate dams.

Coastal High Water Hazards

Tsunamis and storm surges are coastal flooding concerns. Damaging tsunamis are rare but potentially catastrophic events. Over the past 150 years, California has had 12 tsunamis which have caused damage, the worst occurring in 1964 when 12 people died from a tsunami generated by an Alaskan earthquake. Local earthquakes can produce damaging tsunamis that will provide very little warning time. The geologic record indicates that the Cascadia Subduction Zone has been a near-shore source for a number of significant tsunami events affecting Humboldt County, the most recent occurring about 300 years ago. Tsunami run-up elevations in excess of 30 feet above mean sea level have been estimated for the north and south spit of Humboldt Bay. The Plan addresses this risk through mapping of high risk areas, standards for new development located in run-up zones, and tsunami preparedness efforts in low-lying coastal communities.

Storm surges occur when coastal storms produce large ocean waves that sweep across coastlines inundating low lying areas and causing flooding. If a storm surge occurs at the same time as high tide, flooding is more extensive.

Drainage Management

Drainage management becomes increasingly important as new development converts additional areas in a watershed to hard surfaces. Impervious surfaces reduce infiltration and increase peak flows during storms. Increased peak flows can accelerate erosion and the loss of fish habitat and riparian areas or require the conversion of natural drainage ways into higher capacity conveyances that can more rapidly transport stormwater. The loss of natural stream and riparian systems in urban areas may cause water quality problems downstream by concentrating runoff, which may contain pollutants such as sediment, oil and greases, pesticides, fertilizers, metals, and bacterial and viral contaminants. Higher capacity conveyances are problematic for Humboldt's flood basins because moving water faster to these areas only prolongs flooding of the low-lying areas.

Drainage problems and associated flooding are reduced through this Plan by use of various measures to decrease runoff. These measures include upstream retention and detention basins, improved watershed management and stream protection, reduction of impervious surfaces, proper siting of development projects, implementing known successful Low Impact Development technologies, and other similar measures.

Fire Hazard

Fire Hazard Severity Mapping

The wildfire hazard in the county has been analyzed using the methodology of CAL FIRE's Fire and Resource Assessment Program (FRAP) (2007). This method takes into account fuels, terrain, weather, and other relevant factors. The potential for destructive fires in Humboldt County ranges from moderate to very high in severity classification.

CAL FIRE's severity classifications for SRA areas within Humboldt County are shown on the CAL FIRE Fire Hazard Severity Zone Map. The Map generally reflects a moderate to high rating on the western portions of the county where the fuel potential is high but the climate is damp. The very high ratings are generally in the drier eastern portions of the county or in very steep terrain.

The Fire Hazard Severity Zone Map is used to apply mitigation strategies in proportion to wildland fire risk. The mitigation strategies and standards in SRA are a locally adopted version of the State's SRA Fire Safe Regulations (Humboldt County Code, Division 11 of Title III). These regulations constitute local alternative standards, as authorized by California Public Resources Code, Section 4290, and have been approved by CAL FIRE as meeting or exceeding the state regulations.

Fire Service Providers

Fire hazards fall into two general categories: wildland fires, which emanate from forest, grassland, or open chaparral; and structural fires, which damage homes and workplaces and may spread to other areas. In general, structural fire protection is the responsibility of local agencies, such as fire protection districts and volunteer fire companies; wildland fire protection is the responsibility of federal and state agencies.

Due to the highly diverse range of community characteristics and emergency service needs throughout Humboldt County, each local fire department strives to develop an emergency response and deployment system that reflects its constituents' expectations, community needs, and local risks, while staying within the organization's revenue and support constraints. Most local fire departments are multi-service providers, responding to structure fires, wildland fires, vehicle accidents, medical aid calls, and more. In response to such a diverse range of service demands, the County receives fire protection and related emergency services from a variety of fire organizations.

A majority of the local fire departments are associated with a special district formed to provide services within a specific jurisdictional boundary. However, there are many areas throughout the county where homeowners live outside the boundaries of an established district. District resources often respond to these "good will" service areas even though they are under no obligation to do so and receive no dependable compensation for their service. Redwood Valley, Maple Creek, upper Jacoby Creek, and other remote areas currently fall into this category. There are other areas outside of local district boundaries where volunteer fire companies have assumed responsibility for community fire service. These companies have no government affiliation and do not receive a reliable source of funding to support services.

The California Department of Forestry and Fire Protection (CAL FIRE) is responsible for wildland fires on State Responsibility Areas (SRA), which includes most of the rural privately owned lands within the county. When staffed, CAL FIRE provides emergency response for wildland fires, structure fires, vehicle accidents and medical aid calls, and support for local fire agencies as needed. CAL FIRE and the Forest Service are at peak staffing from July through October. During the off-peak part of the year, CAL FIRE responds as available. As cooperators, local agencies frequently assist the federal and State agencies with vegetation fires.

CAL FIRE also provides structural fire protection through an annually renewable contract with the County for County Service Area No. 4 (CSA No. 4). CSA No. 4 covers an area along U.S. Highway 101 (U.S. 101) from the southern boundary of the Orick Community Service District (CSD) to the northern boundary of the Arcata Fire Protection District. CAL FIRE is also under contract with the County and Arcata Fire Protection District to provide local fire dispatch services, which includes the majority of the county fire agencies.

The U.S. Forest Service is primarily concerned with wildfires in national forests. The Forest Service participates in mutual aid agreements with other fire agencies when crews and

equipment are available. The National Park Service provides wildland fire protection within the boundaries of Redwood National park. The Hoopa tribe has responsibility for wildland protection within the Hoopa Square through a federal agreement.

Master Fire Protection Plan

In 2006, the Humboldt County Board of Supervisors approved the Master Fire Protection Plan (MFPP), as a resource to assist in the development of appropriate policies in this General Plan. The MFPP was developed for use as a framework for fire coordination, prevention, and protection throughout the county. The MFPP also makes significant findings and recommendations relating to fire protection capability, fire safe education, fire risk and hazard assessment, fire risk reduction and management, community preparedness and response, and fiscal issues relating to fire protection.

Some of the key findings of the MFPP are listed below. Addressing these issues is a priority of this Plan.

- Volunteers for both non-district fire companies and fire protection districts with varying degrees of experience are primarily responsible for delivering emergency response services in some areas of the county;
- Many developed areas of the county are located outside jurisdictions responsible for year-round structural fire protection and receive services on a "good will" basis;
- Most local fire organizations report having insufficient funding to adequately respond to the demands placed on their service; and,
- Hazardous wildland fuel loading is increasing within and adjacent to local communities at a faster rate than it can be managed.

Airport Safety

The County Public Works Department operates six county airports: Arcata-Eureka (McKinleyville) Airport, Murray Field, Dinsmore Airport, Garberville Airport, Kneeland Airport and Rohnerville Airport. The Board of Supervisors has adopted Airport Master Plans for each of the County maintained airports. In addition, the Board of Supervisors adopted the Airport Land Use Compatibility Plan, which outlines policies for land uses surrounding the airports.

In addition to the airport facilities, the Department of the Navy operates Military Training Routes (MTR) or Military Operating Areas (MOA) that traverse the central parts of the County. The Military Training Routes are comprised of a three dimensional airspace designated for military training and transport activities that have a defined floor (minimum altitude) and ceiling (maximum altitude). The MTR boundaries and minimum altitudes are identified in the Military Operation Area Figure 14-1. Within the MOA, the County needs to consider the impact of new development on military readiness activities and provide notice to the military of new discretionary development within MOA's.

Zone	Location	Impact Elements	Maximum Densities		Required Open Land ³
			Residential du/ac ¹	Other Uses (people/ac) ²	
A	Runway Protection Zone or within Building Restriction Line	<ul style="list-style-type: none"> High risk High noise levels 	0	10	All remaining
B1	Approach/Departure Zone and Adjacent to Runway	<ul style="list-style-type: none"> Substantial risk - aircraft commonly below 400 ft. AGL or within 1,000 ft. of runway Substantial noise 	0.1	60	30%
B2	Extended Approach / Departure Zone	<ul style="list-style-type: none"> Significant risk - aircraft commonly below 800 ft. AGL Significant noise 	0.5	60	30%
B3	Extended Approach / Departure Zone	<ul style="list-style-type: none"> Significant risk - aircraft commonly below 800 ft. AGL Significant noise 	4	60	30%
C	Common Traffic Pattern	<ul style="list-style-type: none"> Limited risk - aircraft at or below 1,000 ft. AGL Frequent noise intrusion 	4	150	15%
C*	Common Traffic Pattern	<ul style="list-style-type: none"> Limited risk - aircraft at or below 1,000 ft. AGL Frequent noise intrusion 	8	150	15%
C1	Common Traffic Pattern	<ul style="list-style-type: none"> Limited risk - aircraft at or below 1,000 ft. AGL Frequent noise intrusion 	2	150	15%
C1*	Common Traffic Pattern	<ul style="list-style-type: none"> Limited risk - aircraft at or below 1,000 ft. AGL Frequent noise intrusion 	2.4	150	15%
D	Other Airport Environs	<ul style="list-style-type: none"> Negligible risk Potential for annoyance from overflights 	No limit	No limit	No requirements

Zone	Additional Criteria		Examples	
	Prohibited Uses	Other Development Conditions	Normally Acceptable Uses ⁴	Uses Not Normally Acceptable ⁵
A	<ul style="list-style-type: none"> All structures except ones with location set by aeronautical function Assemblages of people Objects exceeding FAR Part 77 height limits Hazards to flight⁶ 	<ul style="list-style-type: none"> Dedication of aviation easement 	<ul style="list-style-type: none"> Aircraft tiedown apron Pastures, field crops, vineyards Automobile parking 	<ul style="list-style-type: none"> Heavy poles, signs, large trees, etc.
B1 B2 and B3	<ul style="list-style-type: none"> Schools, day care centers, libraries Hospitals, nursing homes Highly noise-sensitive uses Storage of highly flammable materials Hazards to flight⁶ 	<ul style="list-style-type: none"> Locate structures maximum distance from extended runway center-line Minimum NLR⁷ of 25 dBA in residential and office buildings Dedication of aviation easement 	<ul style="list-style-type: none"> Uses in Zone A Any agricultural use except ones attracting bird flocks Warehousing, truck terminals Single-story offices 	<ul style="list-style-type: none"> Residential subdivisions Intensive retail uses Intensive manufacturing or food processing uses Multiple story offices Hotels and motels
C C* C1 and C1*	<ul style="list-style-type: none"> Schools Hospitals, nursing homes Hazards to flight⁶ 	<ul style="list-style-type: none"> Dedication of overflight easement for residential uses 	<ul style="list-style-type: none"> Uses in Zone B Parks, playgrounds Low-intensity retail offices, etc. Low-intensity manufacturing, food processing Two-story motels 	<ul style="list-style-type: none"> Large shopping malls Theaters, auditoriums Large sports stadiums Hi-rise office buildings
D	<ul style="list-style-type: none"> Hazards to flight⁶ 	<ul style="list-style-type: none"> Deed notice required for residential development 	<ul style="list-style-type: none"> All except ones hazardous to flight 	

Source: Airport Land Use Compatibility Plan - Humboldt County Airports (Hodges & Shutt, 1993, amended 1/27/98)

The Airport Land Use Commission (presently embodied as the Board of Supervisors) coordinates with applicable agencies in ensuring compatible land uses for areas surrounding County airports.

The principal airport/airspace/land use compatibility issues at most airports are:

Noise: Often the most significant of the adverse impacts of airport activities.

Airspace: The height of structures, trees, and other objects in the MOA or in the vicinity of an airport greatly affects the use of that airport.

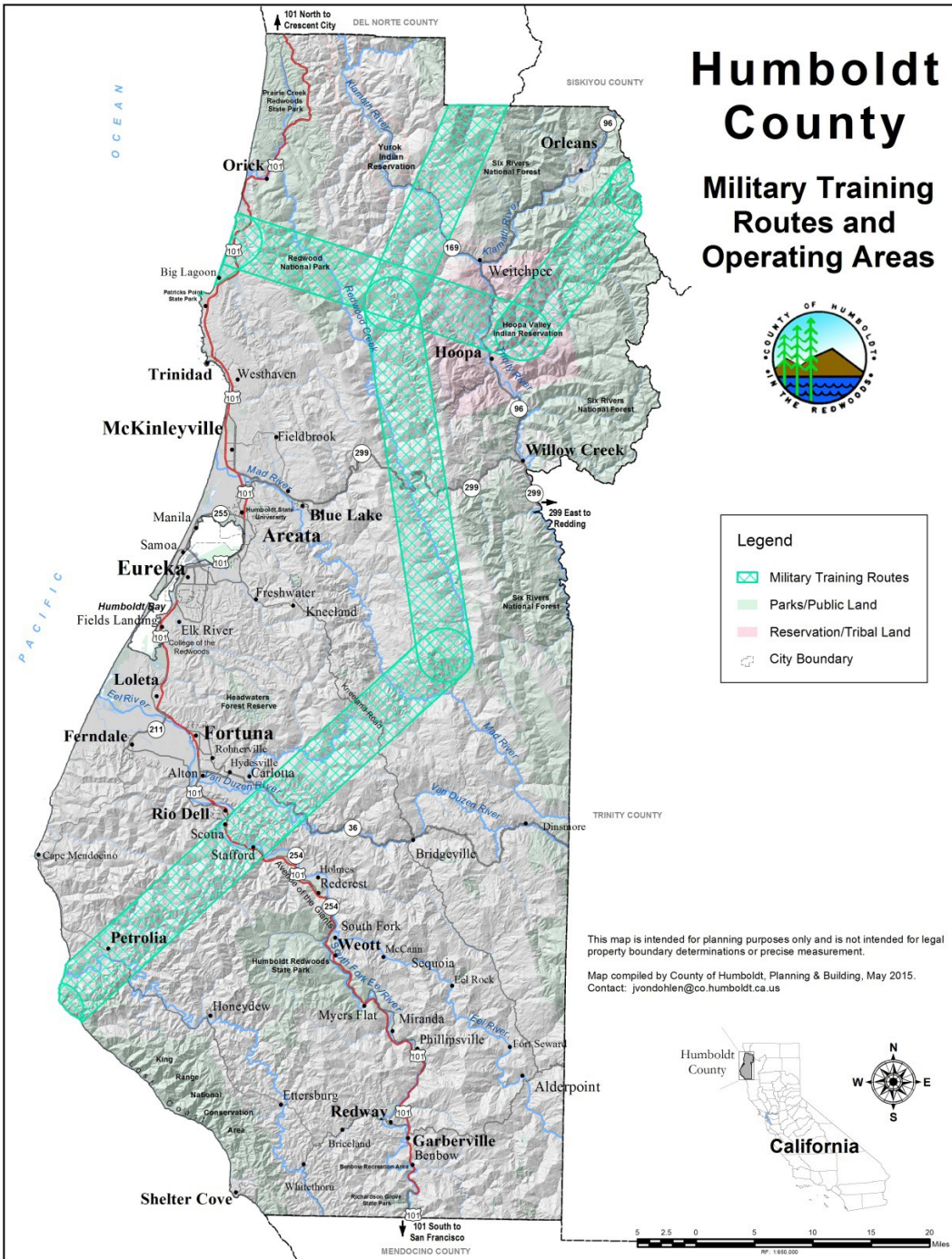
Safety: Controls on land uses near airports can reduce potential risks both to people on the ground and to the occupants of aircraft.

The key policy guidance is given by an Airport Land Use Compatibility Matrix (included here as Figure 14-1).

The Airport Master Plans (www.co.humboldt.ca.us/aviation/) provide more information about onsite airport land use issues and policies.

This Plan requires close coordination between County Planning and Public Works when making land use and zoning decisions around the airports. Specific attention to this issue is given in the community plans, most importantly the McKinleyville Community Plan.

Figure 14-1 Military Training Routes and Operating Areas



Industrial Hazards

Several specific industrial activities have been identified as having the potential to cause significant damage to the surrounding area in the event of an accident. These activities include the use of chlorine at the regional sewage treatment plants, shipping and receiving of hazardous materials other than chlorine, and the nuclear materials at the PG&E Humboldt Bay Power Plant. Each of these activities/facilities has a contingency plan that directs the appropriate disaster responses. In addition, policy is provided here to address the siting of new hazardous industrial facilities.

Emergency Management

Humboldt County Ordinance 2203 established the Humboldt Operational Area (OA) and identified the Sheriff as Director of Emergency Services for the County. The Humboldt OA is composed of the County of Humboldt, serving as the lead agency, and all political subdivisions (cities and special districts). The Office of Emergency Services (OES) assists the Sheriff in controlling and directing the effort of the emergency organization of the County and is part of the Special Operations Division within the Sheriff's Department.

The OES is responsible for maintaining the Humboldt County Emergency Operations Plan, which serves to address the planned response to extraordinary emergency situations associated with natural disasters, technological incidents, and national security emergencies in, or affecting, Humboldt County. OES also maintains specific hazard response plans for earthquake, flooding, tsunamis, coastal storms, and other events. These response plans are used to determine the most appropriate evacuation routes based on the nature and extent of hazard. Pre-disaster evacuation route planning is addressed through a variety of efforts including the FEMA local hazard mitigation plan program, the seismic retrofit program for state bridges and overpasses, tsunami response planning, and the application of the CAL FIRE SRA standards for emergency access.

14.4 Goals and Policies

Goals

- S-G1. Minimize Loss.** Communities designed and built to minimize the potential for loss of life and property resulting from natural and manmade hazards.
- S-G2. Prevent Unnecessary Exposure.** Areas of geologic instability, floodplains, tsunami run-up areas, high risk wildland fire areas, and airport areas planned and conditioned to prevent unnecessary exposure of people and property to risks of damage or injury.
- S-G3. Natural Drainage and Watershed Protection.** Natural drainage channels and watersheds that are managed to minimize peak flows in order to reduce the severity and frequency of flooding.
- S-G4. Fire Risk and Loss.** Development designed to reduce the risk of structural and wildland fires supported by fire protection services that minimize the potential for loss of life, property, and natural resources.

- S-G5. Airport Safety.** Land use and development in the vicinity of airports that minimizes exposure to unsafe levels of noise and aircraft hazards consistent with the applicable Airport Land Use Compatibility Plan.
- S-G6. Industrial Safety.** Industrial development regulated by performance standards, monitored by the appropriate agencies, and supported by land use plans that minimizes risk and exposure of the population to industrial hazards.
- S-G7. Response Preparedness.** Interagency readiness and capacity to respond to emergencies to reduce loss of life and property, support the population, and facilitate recovery.
- S-G8. Cascadia Event Preparation.** A community prepared to withstand and recover from a high magnitude, long-duration local earthquake along the Cascadia subduction zone.

Policies

General

- S-P1. Reduce the Potential for Loss.** Plan land uses and regulate new development to reduce the potential for loss of life, injury, property damage, and economic and social dislocations resulting from natural and manmade hazards, including but not limited to, steep slopes, unstable soils areas, active earthquake faults, wildland fire risk areas, airport influence areas, military operating areas, flood plains, and tsunami run-up areas.
- S-P2. Coastal Zone Hazards.** Development within the coastal zone shall minimize risks to life and property in areas of high geologic, tsunami, flood, and fire hazard; assure stability and structural integrity; and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding areas or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.
- S-P3. Hazard Education.** Encourage the education of the community regarding the nature and extent of hazards and community disaster preparation and response.
- S-P4. Disaster Response Plans.** The County shall prepare and maintain current disaster response plans. The County shall support and participate in the preparation of disaster response plans by community organizations, companies, cities, and state and federal agencies.
- S-P5. Hazard Mitigation.** The County shall actively seek opportunities to reduce the impacts of disasters through hazard mitigation planning.
- S-PX7. Military Operating Areas.** Provide notification and project information to the military for discretionary development projects within military airspace operating areas as may be required by the California Government Code.

Geologic/Seismic

- S-P6. Structural Hazards.** The County shall protect life and property by applying and enforcing state adopted building codes and Alquist-Priolo requirements to new construction.
- S-P7. Improved Information.** Encourage and support more detailed scientific analysis of Cascadia Subduction Zone earthquake risks, probabilities, and anticipated effects.
- S-P8. Earthquake Mitigation Planning.** The potential for a local earthquake in excess of magnitude 9.0 (Richter scale) shall be considered in disaster planning, risk assessment, and pre-disaster mitigation efforts.
- S-P9. Cascadia Event Disaster Response.** The County shall maintain readiness for a comprehensive response to a major earthquake consistent with the nationwide emergency management hierarchy and the adopted Emergency Response Plan for the Humboldt Operational Area.
- S-PX1. Site Suitability.** New development may be approved only if it can be demonstrated that the proposed development will neither create nor significantly contribute to, or be impacted by, geologic instability or geologic hazards.

Flooding

- S-P10. Federal Flood Insurance Program.** The County shall participate in the Federal Flood Insurance Program and maintain Flood Damage Prevention regulations in the County Code to regulate land uses in flood hazard areas in order to minimize loss of life and property and public flood-related expense.
- S-P11. Flood Plains.** Agricultural lands that are in mapped floodplains shall be retained for use in agriculture.
- S-PX2. Prohibition of Residential Subdivisions within Floodplain.** The creation of new parcels that increase residential density wholly within the 100 year floodplain, as identified in the most recent FEMA flood insurance rate maps, shall be prohibited unless the Board of Supervisors makes specific findings that the potential for loss of life and property can be reduced to less than significant levels.
- S-PX3. Construction Within Special Flood Hazard Areas.** Construction within a floodplain identified as the 100-Year Flood Boundary on FEMA's Flood Insurance Rate Map shall comply with the County's Flood Damage Prevention Regulations. Fill in the floodplain shall only be allowed if it can be demonstrated that the fill will not have cumulative adverse impacts on or off site and such fill shall not be detrimental to productive farm land, and is otherwise in conformance with the County's Flood Damage Prevention Regulations.

- S-PX4. Development on, or Adjacent to, Coastal Bluffs and Beaches.** Allow development in areas immediately adjacent to coastal bluffs and beaches only if it can be demonstrated by a certified engineering geologist that wave action, storm swell, tsunami inundation, and projected sea level rise using the best available scientific information and at the time of review, are not a hazard to the proposed development.

Fire Hazards

- S-P12. Joint Planning and Implementation.** The County shall plan collaboratively with local fire agencies and companies, CAL FIRE, and federal fire organizations on countywide fire prevention and response strategies. Implementation shall be coordinated to maximize efficiency and ensure efforts are complimentary.
- S-P13. Subdivision Design in High and Very High Fire Hazard Zones.** Subdivisions within State Responsibility Area (SRA) high and very high fire severity classification areas shall explicitly consider designs and layout to reduce wildfire hazards and improve defensibility; for example, through clustering of lots in defensible areas, irrigated green belts, water storage, perimeter roads, roadway layout and design, slope development constraints, fuel modification plans, and vegetation setbacks.
- S-P15. Conformance with State Responsibility Areas (SRA) Fire Safe Regulations.** Development shall conform to Humboldt County SRA Fire Safe Regulations.
- S-P16. Level-of-Service Standards.** Support the development of a level of service standard by the Humboldt County Fire Chief's Association for all emergency response services (fire, EMS, HazMat, and rescue) and make such information public so that landowners and residents understand the distribution and quality of service.
- S-P17. Fire District Boundary Maps.** The County shall maintain and publish fire district boundary maps.
- S-P18. Prescribed Burning.** Encourage the use of prescribed burning as a management tool for hazardous fuels reduction, timber management purposes, livestock production, and enhancement of wildlife habitat.
- S-P18. Hazardous Fuel Reduction.** Encourage land management activities that result in the reduction of hazardous fuels and also support timber management, livestock production, and the enhancement of wildlife habitat, through the use of prescribed burning, hand or mechanical methods, firewise plants, biomass utilization, and animal grazing.
- S-P19. Fire Safe Education.** Expand fire prevention and mitigation education capacity in the county.
- S-P20. Fire Service Provider Support.** Make information available to fire service providers about creating districts, increasing organizational capacity, developing funding streams, and improving Insurance Services Office (ISO) ratings for reduced insurance costs.

- S-PX5 Protection of Native Plants.** The County shall promote fire-safe practices that encourage conservation and use of native plants and native plant ecosystems, while protecting citizens, firefighters, and property.
- S-PX6 Alternative Owner Builder High and Very High Fire Severity Zones.** Alternative Owner Builder (AOB) permits for construction of new dwellings in high and very high fire severity zones shall be required to comply with the materials and construction methods for exterior wildfire exposures of the California Residential Code (CRC) and chapter 7-A of the California Building Code (CBC) as amended, unless the construction materials can be found to be in substantial conformance with the California Building Codes by the Humboldt County Building Official.

Airport Safety

- S-P21. Development Compatibility.** Encourage the Airport Land Use Commission to review the Airport Land Use Compatibility Plan (ALUCP) at least every five years to ensure that the ALUCP accurately defines planning areas around airports and establish land use policies and standards appropriate for the public safety and protection of airport operations. Amend the General Plan Safety Element to be consistent with changes to the ALUCP.
- S-P22. Airport Land Use Compatibility Criteria.** Regulate and plan land use around airports according to the Airport/Land Use Safety Compatibility Criteria (Table 14-A), which shall be consistent with the ALUCP.
- S-P23. Obstruction-free Approach Surfaces.** The maintenance of obstruction-free approach surfaces at all airports identified on the Approach and Clear Zone plans consistent with FAA requirements shall be principally permitted.
- S-P24. Airport Safety Combining Zone.** Utilize an airport safety combining zone within airport influence areas to ensure consistent application of the Airport/Land Use Safety Compatibility Criteria matrix.

Industrial Hazards

- S-P25. Hazardous Industrial Development.** Hazardous industrial development may be permitted when:
- A. It includes mitigation measures sufficient to offset increased risks to adjacent human populations and the environment; and
 - B. Increased risks to adjacent human populations and the environment have been adequately mitigated by approved disaster response plans. (See definition of "hazardous industrial development" in Standards Section below).
- S-P26. Hazardous Waste.** Eliminate the use of toxic materials within Humboldt County, where feasible, and require the reduction, recycling, and reuse of such materials, to the greatest extent possible, where complete elimination of their use is not feasible. Require new development which may generate significant quantities of hazardous wastes to be consistent with all the goals and policies of the Hazardous Waste Management Plan (Appendix H).

Emergency Management

- S-P27. Pre-disaster Planning and Mitigation.** The County shall proactively reduce known hazards through pre-disaster planning and mitigation efforts.
- S-P28. Hazard Mitigation Plan.** The County incorporates by reference into this Safety Element the Humboldt Operational Area Hazard Mitigation Plan for unincorporated areas (Volume I and the Humboldt County Annex and the Appendices of Volume II) as adopted and amended by the Board of Supervisors, in accordance with the Federal Disaster Mitigation Act of 2000 and California Government Code, Section 65302.6.
- S-P29. Emergency Operations Capability.** The County shall maintain the ability to implement the nationwide National Incident Management System (NIMS), statewide Standardized Emergency Management System (SEMS), activate the Operational Area Emergency Operations Center (EOC), coordinate responders, and implement other tactical response measures as required. Emergency operations shall conform to the Humboldt County Operational Area Emergency Operations Plan.
- S-P30. Tsunami Ready Program.** The County shall support efforts of low-lying coastal communities to attain TsunamiReady™ status, as developed by the National Weather Service.

14.5 Standards

Geologic

- S-S1. Geologic Report Requirements.** Site specific reports addressing geologic hazards and geologic conditions shall be required as part of the review of discretionary development and ministerial permits. Geologic reports shall be required and prepared consistent with land use regulations (Title III, Land Use and Development, Division 3, Building Regulations, Chapter 6—Geologic Hazards.)
- S-S2. Landslide Maps.** Utilize California Division of Mines and Geology, North Coast Watersheds landslide mapping as information to assist in review of developments.
- S-S3. Alquist-Priolo Fault Hazard Zones.** Utilize California Mines and Geology Board Policies and Criteria for Alquist-Priolo Fault Hazard Zones (Special Publication #42) as standards of implementation within zones.
- S-S4. Tsunami Emergency Response Plan.** The Tsunami Emergency Response Plan shall guide interagency response efforts.

Flood Management

- S-S5. Flood Regulations.** Regulatory standards for flood mitigation shall be based on FEMA Flood Insurance Rate Maps and regulations and local ordinances.

- S-S6. Flood Plains.** No new essential facilities that would be rendered inoperable by flooding shall be permitted to locate within the 100-year flood plain.
- S-S8. Flooding and Drainage Management Activities.** Flooding and drainage management shall be principally permitted in all zones when consistent with applicable state, federal, and local regulations.

Fire Hazards

- S-S9. SRA Fire Safe Regulations.** Development within SRA shall conform to SRA Fire Safe Regulations (Humboldt County Code, Division 11 of Title III as amended).
- S-S10. California Building Codes.** New construction shall conform to the most recently adopted California building codes.
- S-S11. California Fire Code.** The California Fire Code shall be applied to all applicable development.
- S-S12. Fire Hazard Severity Zone Maps.** The County shall use the most recently adopted CALFIRE Fire Hazard Severity Zone Maps for fire planning and local land use and development review purposes.
- S-S13. Master Fire Protection Plan.** Utilize the Master Fire Protection Plan for countywide fire prevention and response strategy and implementation.

Airport Safety

- S-S14. Airport Land Use Compatibility Plan.** Development within the jurisdiction of Airport Land Use Compatibility Plans (ALUCP) shall conform to the policies and standards of the ALUCP.

Industrial Hazards

- S-S15. Hazardous Materials Handling and Emergency Response.** The County shall condition new development that handles toxic, flammable, or explosive materials in such quantities that would, if released or ignited, constitute a significant risk to adjacent human populations or development to conform to the applicable state or federal materials handling and emergency response plans.
- S-S16. Transport of Nuclear Materials.** Transport of nuclear materials shall conform to the prohibitions of Ordinance #1403; Humboldt County Code, Title III, Division 8, Chapter 3, as amended.

Emergency Management

- S-S17. Humboldt County Operational Area Office of Emergency Services (OES).** Local emergency management and response operations shall be consistent with Humboldt County Operational Area Emergency Operations Plan and Humboldt County Ordinance 2203.
- S-S18. Consistency with State and Federal Framework.** County emergency response efforts shall be consistent with the California Emergency Services Act

(California Government Code, Section 8550 et seq.) and the federal National Response Framework (effective March 2008, as amended) and the National Incident Management System (NIMS).

14.6 Implementation

- S-IM1. Code Review.** Review and amend, as needed, the land use code and subdivision regulations for consistency with fire protection policies of the General Plan.
- S-IM2. Hazard Planning Information on the Internet.** Maintain countywide hazard land use planning data, such as fire district boundaries, State Responsibility Areas (SRA), hazard areas and plans, on the internet.
- S-IM3. Drainage Ordinance.** The County shall implement drainage course flood mitigation policies through the adoption of a drainage ordinance.
- S-IM4. Update County State Responsibility Areas (SRA) Fire Safe Regulations.** Humboldt County SRA Fire Safe regulations should be updated to ensure that fire mitigation is proportional to risk as identified in State Fire Hazard Severity Maps.
- S-IM5. Coordination with CAL FIRE on State Responsibility Areas (SRA) Exception Requests.** The County shall maintain efficient and timely procedures for processing SRA Exception Requests to CAL FIRE.
- S-IM6. Master Fire Protection Plan (MFPP).** Actively support and pursue the implementation recommendations in the MFPP. Periodically update the MFPP. The risk assessment portion of the MFPP shall be updated at least every five years.
- S-IM7. Funding Fire Planning Activities.** The County shall pursue state and federal funding sources to support the coordination and planning needs of local fire safe councils and fire agencies.
- S-IM8. Local Hazard Mitigation Plan.** Participate in FEMA's pre-disaster mitigation program by developing, maintaining, and implementing a Local Hazard Mitigation Plan.
- S-IM8X. Flood Elevation Markers.** To increase public awareness of flood hazard levels, seek funding to place flood elevation markers along roadways in flood-prone communities.
- S-IM9. Emergency Operations Plan.** The County shall maintain a Humboldt County Operational Area Emergency Operations Plan consistent with FEMA standards.
- S-IM10. Geologic Reports Correction.** Correct errata in the Geologic Hazards Land Use Matrix contained in the grading and building regulations (Title III, Land Use and Development, Division 3, Building Regulations, Chapter 6—Geologic Hazards.)

- S-IMX1. Probabilistic Tsunami Inundation Mapping.** The County shall seek funding to conduct studies and prepare probabilistic tsunami hazard mapping for the unincorporated areas and prepare and publish probabilistic tsunami run-up maps for use in ministerial and discretionary project review.
- S-IMX2. Firewise Plants.** The County shall provide a list of recommended "Firewise" plants suited to, and/or native to, the local area. This list should be developed with the cooperation of the County and fire authorities having jurisdiction and botanical experts, and made available at the Humboldt County Planning Department and include information about how to maintain plants to maximize fire resistance.
- S-IMx3. Structural Hazards.** The County shall assist property owners in making upgrades to existing structures to mitigate structural hazards.
- S-IMX5. Airport Compatibility Zones.** Incorporate into the Safety Element Maps in Appendix F the new airport compatibility zone data for airports and surrounding areas from Airport Master Plans, and from new ALUPs within six months of adoption of a new ALUP.

Chapter 15. Air Quality Element

15.1 Purpose

The purpose of this Element is to describe the county's existing air quality, sources of air pollution, and strategies for improving air quality. Policies to reduce greenhouse gas emissions and mitigate climate change are included in this Element.

15.2 Relationship to Other Elements

Air quality considerations, including greenhouse gas emissions, are reflected in policies within the Land Use, Circulation, Energy, and Safety elements and in the Mineral Resources Chapter of the Conservation and Open Space elements.

15.3 Background

Air Quality Standards and Sources of Emissions

As a whole, air quality in this county is better than other parts of the state. Local measurements by the North Coast Unified Air Quality Management District (NCAQMD) reveal that the county currently meets all federal standards for air quality and all state standards except for one pollutant – airborne particles that are 10 microns in diameter and smaller (PM₁₀). Continued review and refinement of national and state standards may require additional control technologies.

Emissions of PM₁₀ come from a number of sources within Humboldt County:

- Stationary sources such as power plants and manufacturing facilities. These sources are not the most significant PM₁₀ contributors locally.
- Area-wide sources in which emissions originate from many points over a wide area. These include emissions from, fireplaces, construction and demolition, road dust, and agricultural operations. Wood stove emissions are a significant source of PM₁₀ emissions during the winter months when the county exceeds PM₁₀ thresholds. Road dust is a significant source during dry months.
- Mobile sources including "on-road sources" such as automobiles, and "off-road sources," such as farm and construction equipment. Automobiles are significant sources of PM₁₀ locally.
- Natural sources include wildfires, sea salts, windblown dust, and biogenic emissions from plants and trees. Along the coast, sea salts are a significant source of PM₁₀.

The emissions from stationary sources are subject to General Plan policies if the project requires discretionary land use permits. Environmental review of new development requires coordination between NCUAQMD and the County to ensure project conditions are consistent with state air quality laws and to reduce impacts below levels of significance. There is also direct coordination with NCUAQMD on the demolition of

commercial structures that may involve asbestos and on surface mining and grading that occurs in areas containing naturally occurring asbestos. This Plan supports complimentary policies and supports frequent communication between the County and the NCUAQMD to coordinate efforts, avoid regulatory redundancy and minimize permit costs and delays.

Area-wide and mobile source emissions are addressed through General Plan policies that target specific sources. Transportation policies have been designed to reduce area-wide PM₁₀ levels by reducing both the number of vehicle miles traveled and the number of vehicle trips. Grading and road maintenance policies also work to reduce particulates in dust. Incentives for energy efficient building construction will help reduce emissions related to residential and commercial energy consumption, including woodstove emissions.

Naturally occurring PM₁₀ from wildfires may be reduced by decreasing the occurrence and severity of wildfires. Provisions in the Forest Resources Chapter and Safety Element support fuel hazard reduction programs and initial attack on wildfires that may adversely impact the air quality of local population centers.

Greenhouse Gas Emissions and Climate Change

California is the fifteenth largest emitter of greenhouse gases (GHGs) in the world, representing about two percent of worldwide emissions. In an effort to help curb global warming, new state laws regulating GHGs were enacted in 2006. Assembly Bill 32, the Global Warming Solutions Act, requires the state to implement a series of actions to achieve a reduction in GHG emissions to 1990 levels by 2020.

Through AB 32, the statewide cap for 2020 GHG emissions has been set at 427 million metric tons of carbon dioxide equivalents (MMTCO₂E). Reducing GHG emissions to this level means cutting approximately 30% from business-as-usual emission levels projected for 2020, or about 10% from today's levels. On a per-capita basis, that means reducing our annual emissions of 14 tons of carbon dioxide for every person in California down to about 10 tons per person by 2020.

California's draft Climate Change Scoping Plan (June 2008) recommends 2 million metric tons carbon dioxide equivalent MMTCO₂E reduction in GHG emissions by 2020 from local government actions. The Scoping Plan believes local government can directly influence:

- **Energy.** The energy used in local government buildings, equipment, and infrastructure as well as the amount of energy used by community businesses and residents through building codes, conservation programs, and other mechanisms.
- **Waste and Recycling.** Local government's own waste and recycling activities and the carbon footprint of their jurisdiction's waste and recycling operations through collection system adjustments and promotion of waste reduction and recycling.
- **Water and Wastewater Systems.** Water use in municipal operations and through community-wide water conservation and reclamation program efforts.
- **Transportation.** Increases in the carbon efficiency of government fleets and local transportation planning processes to increase the use of transit, carpooling, biking, and walking. New development can be planned and distributed in a carbon-efficient way.

- **Design.** Siting and design of new developments in a way that reduces greenhouse gases associated with energy, water, waste, and vehicle travel.

On December 4, 2007, the Board of Supervisors joined the International Council on Local Environmental Initiatives' (ICLEI) campaign to reduce local carbon emissions using a five-step process:

1. Conduct a baseline emissions inventory and forecast of emissions growth.
2. Set an emissions reduction target.
3. Develop a Climate Action Plan to meet the emissions reduction target.
4. Implement the Climate Action Plan.
5. Monitor and verify progress and results.

Through this process, the County intends to lead by example and reduce GHG emissions in its own operations to 10% below 2003 levels by 2020 (current AB 32 goal). Through this General Plan and participation in a countywide Climate Action Plan, the County intends to reduce GHG emissions in the unincorporated area resulting from its discretionary land use decisions to 10% below 2003 levels by 2020. The County will also partner with local cities to attain this level of reduction for the entire county.

CEQA requires public agencies to identify the potentially significant effects on the environment of projects they intend to carry out, or approve, and to mitigate significant effects whenever it is feasible to do so. AB 32 establishes that GHG emissions cause significant adverse impacts to the environment so the General Plan must include feasible mitigations to offset the GHG emissions associated with the Plan.

The Plan includes a range of mitigations for reducing GHG emissions and mitigations to achieve increased carbon storage within the County. Increasing carbon storage on timber and agricultural lands may be the County's most effective means to combat global warming

The State's 2020 target for California's forest lands is to retain the current carbon storage capacity of California's forests through sustainable management practices, reducing the risk of wildfire, and the avoidance or mitigation of land use changes that reduce carbon storage. This equates to 5 MMTCO₂E of carbon storage, which is more than 10% of all non-transportation reductions planned through 2020, underscoring the role that forest lands will play in California's efforts to reduce GHG emissions.

The state's first forest carbon storage project to be verified through the California Climate Action Registry was located in Humboldt County on 2,100 acres owned by the van Eck Forest Foundation. The project generated more than 500,000 tons of carbon credits that are being sold to interested purchasers. Under AB 32, California is planning to implement a cap-and-trade program by 2012 that could increase the demand for verifiable carbon credits. This may create increased financial opportunities for forest and agricultural landowners in Humboldt County willing to manage their lands consistent with accepted carbon storage protocols.

While timber management is regulated by the state under the Forest Practices Act, this Plan proposes the development of a program that could provide carbon credits to local forest landowners who voluntarily agree to long-term restrictions on land uses that increase GHG emissions. These carbon credits could be registered and potentially sold under a GHG emissions cap-and-trade program and provide a financial incentive to maintain lands in resource production. Carbon storage in timberlands also have co-benefits in protecting water quality and wildlife habitat.

15.4 Goals and Policies

Goals

- AQ-G1. Improved Air Quality.** Air quality that meets state and federal ambient air quality standards.
- AQ-G2. Particulate Emissions.** Successful attainment of California Ambient Air Quality Standards for particulate matter.
- AQ-G2x. Other Criteria Pollutants.** Maintain attainment of Ambient Air Quality Standards for ozone and other criteria pollutants which may be subject to tightening standards.
- AQ-G3. Greenhouse Gas Emissions.** Successful mitigation of greenhouse gas emissions associated with this Plan to levels of non-significance as established by the Global Warming Solutions Act and subsequent implementation of legislation and regulations.

Policies

- AQ-P1. Reduce Length and Frequency of Vehicle Trips.** Reduce the length and frequency of vehicle trips through land use and transportation policies by encouraging mixed-use development, compact development patterns in areas served by public transit, and active modes of travel.
- AQ-P2. Reduce Localized Concentrated Air Pollution.** Reduce or minimize the creation of "hot spots" or localized places of concentrated automobile emissions.
- AQ-P3. Fireplace and Woodstove PM₁₀ Emissions.** Support incentives to minimize emissions from fireplaces and woodstoves.
- AQ-P4. Construction and Grading Dust Control.** Dust control practices on construction and grading sites shall achieve compliance with NCAQMD fugitive dust emission standards.
- AQ-P5. Air Quality Impacts from New Development.** During environmental review of discretionary permits, reduce emissions of air pollutants from new commercial and industrial development by requiring feasible mitigation measures to achieve the standards of the NCAQMD.
- AQ-P6. Buffering Land Uses.** During environmental review of discretionary commercial and industrial projects, consider the use of buffers between new sources of emissions and adjacent land uses to minimize exposure to air pollution.
- AQ-P7. Interagency Coordination.** Coordinate with the NCAQMD early in the permit review process to identify expected regulatory outcomes and minimize delays for projects involving:

- A. CEQA environmental review;
- B. Building demolition projects that may involve removal of asbestos-containing material subject to National Emission Standards for Hazardous Air Pollutants (NESHAP); and
- C. Grading and mining operations subject to State Airborne Toxic Control Measures (ATCM) for naturally occurring asbestos.

Rely on the air quality standards, permitting processes, and enforcement capacity of the NCAQMD to define thresholds of significance and set adequate mitigations under CEQA to the maximum extent allowable.

- AQ-P8. Reduce Air Quality Impacts from Wildfires.** Support and encourage fire suppression of wildfires that may have an acute air quality health impact on local population centers.
- AQ-P9. County Climate Action Plan.** Through public input and review, develop and implement a multi-jurisdictional Climate Action Plan to achieve reductions in greenhouse gas emissions consistent with the state Global Warming Solutions Act and subsequent implementing legislation and regulations.
- AQ-P10. County Government Greenhouse Gas Emission Reductions.** To lead by example, the County of Humboldt shall reduce its 2003 greenhouse gas emissions from governmental operations consistent with the state Global Warming Solutions Act and subsequent implementing legislation and regulations.
- AQ-Px. Review of Projects for Greenhouse Gas Emission Reductions.** The County shall evaluate the GHG emissions of new large scale residential, commercial and industrial projects for compliance with state regulations and require feasible mitigation measures to minimize GHG emissions.
- AQ-Px1. Transfer of Development Rights.** The County shall encourage the transfer of development rights from resource lands and other rural areas into areas served with public water and sewer to reduce GHG emissions from new development.
- AQ-P11. Forest Sequestration and Biomass Energy.** Provide incentives for increased carbon sequestration on forest lands and encourage the reduction of smoke production through the utilization of excess forest biomass for sustainable energy generation and other uses.
- AQ-P12. Solar Electric System Capacity.** Encourage and provide incentives to increase solar-electric capacity in residential, commercial, and industrial sectors.
- AQ-P13. Energy Efficient Building Design.** Encourage and provide incentives for construction of buildings and energy saving measures beyond Title 24 requirements for residential and commercial projects.
- AQ-P14. Electric Vehicle Accommodations.** Encourage and provide incentives for commercial and residential design that supports the charging of electric vehicles.

- AQ-P15. Preservation and Replacement of On-site Trees.** Projects requiring discretionary review should preserve large trees, where possible, and mitigate for carbon storage losses attributable to significant removal of trees.

15.5 Standards

- AQ-S1. Construction and Grading Dust Control.** Ground disturbing construction and grading shall employ fugitive dust control strategies to prevent visible emissions from exceeding NCAQMD regulations and prevent public nuisance.
- AQ-Sx. Evaluate Greenhouse Gas Emission Impacts.** During environmental review of large scale residential, commercial and industrial projects, include an assessment of the project's GHG emissions and require feasible mitigation consistent with best practices documented by the California Air Pollution Control Officers Association in their 2008 white paper "CEQA & Climate Change" or successor documents.
- AQ-S2. Evaluate Air Quality Impacts.** During environmental review of discretionary projects, evaluate new commercial and industrial sources of emissions using analytical methods and significance criteria used, or recommended by, the NCAQMD.
- AQ-S3. Buffering Land Uses.** When considering buffers between new commercial and industrial sources of emissions and adjacent land uses follow the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective* and NCAQMD recommendations.
- AQ-S4. Preservation and Replacement of On-site Trees.** Large scale residential, commercial and industrial projects which remove a significant number of large trees (for example, more than 50 trees of greater than 12 inches DBH) shall plant replacement trees on-site or provide offsetting carbon mitigations.

15.6 Implementation Measures

- AQ-IM1. Review Attainment Plan Revisions.** Review local Attainment Plan revisions to guide future General Plan and Housing Element updates, as necessary, and implement new land use and transportation policies and other regulatory controls as identified by the attainment.
- AQ-IM2. North Coast Air Quality Management Permitting Coordination.** The County shall maintain efficient and timely procedures for project referral to the North Coast Air Quality Management District for review and consultation.
- AQ-IM3. County-wide Climate Action Plan.** Develop and implement a Climate Action Plan that effectively mitigates the carbon emissions attributable to this Plan, consistent with the requirements of the state Global Warming Solutions Act and subsequent implementing legislation and regulations.
- AQ-IM4. County Government Greenhouse Gas Emission Reductions.** The County shall prepare a Climate Action Plan for its governmental operations consistent with

the Countywide Climate Action Plan that seeks emission reductions in the following areas:

- A. Energy Efficiency and Conservation
- B. Green Building
- C. Waste Reduction and Recycling
- D. Climate-Friendly Purchasing
- E. Renewable Energy and Low-Carbon Fuels
- F. Efficient Transportation
- G. Offsetting Carbon Emissions
- H. Promoting Community and Individual Action

- AQ-IM5. Greenhouse Gas Emissions.** Update the General Plan and Land Use Ordinances, as appropriate, to reflect the adopted countywide Climate Action Plan and the new state laws and regulations for greenhouse gas emissions when they become available.
- AQ-IMx. Review of Greenhouse Gas Emissions Impacts of New Development.** Modify the Zoning and Subdivision Ordinances to assess GHG emissions of discretionary large scale residential, commercial and industrial projects, and require feasible mitigation.
- AQ-IM6. Programs to Reduce Air Quality Impacts of Wildland Fires.** Support and encourage programs such as fuel reduction, prescribed fires, and vegetation management as recommended in the County's Fire Plan to reduce air quality impacts of wildfires.
- AQ-IMx1. Transfer of Development Rights Program.** The County shall develop a voluntary transfer of development rights program which provides incentives to transfer entitlements from resource lands and other rural areas into areas served with public water and sewer to reduce GHG emissions from new development.
- AQ-IMx2. Reduce Air Quality Impacts from Surface Mining.** To reduce air quality impacts from asbestos and other pollutants, refer all discretionary review actions for new and existing rock quarries and other surface mining activities to the North Coast Air Quality Management District for review and recommendations.
- AQ-IM7 Co-benefits of Emissions Reduction.** Recognize that certain climate change mitigation measures to reduce emissions have benefits beyond air quality and serve to complement other goals and Elements in the General Plan. Incorporate co-benefits into decision-making for implementation measures.