

NCHB Executive Summary

Comments for Group 2 Humboldt County General Plan Update: 3/15/07

Mineral Resources – CHAPTER 16, GROUP 2 - This element is an optional element per State General Plan guidelines.

The NCHB is concerned that the proposed policy language that dictates extraction and exporting quantities of sand, gravel and rock in and from Humboldt County will directly dictate the affordability of housing, commercial and other construction in Humboldt County. Sand, gravel and rock are base materials for road grading, fill and concrete used in construction. Any regulations put on this industry other than those that are already in effect through the North Coast Air Quality Management District, Northern California Regional Water Quality Control Board, and the California Department of Conservation would be duplicative and potentially crippling to this County's economic viability. For example:

- Rock quarry owners, usually ranchers and timber land owners, regularly have to rely on using the proceeds from their rock quarries to supplement their incomes.
- The construction industry suffers higher prices due to lower product availability, thereby directly affecting housing affordability.
- The County Public Works Department relies on immediate access from quarry owners to aggregate when it needs sand, gravel and rock for road and highway repairs, slide repairs and slope stabilization. If too, would suffer higher costs due to lower availability.
- The County Economic Development Department is in support of renovating the local railroads to have future product transport potential for all goods leaving and entering the County. Adding regulatory costs would affect the availability of gravel, rock and sand, and would threaten the likelihood of railroad track beds, tunnels etc. ever being constructed or repaired in this County.

Humboldt County should stay out of the mining business. Relevant mining issues are currently governed by agencies more equipped to deal with them such as the North Coast Air Quality Management District, Northern California Regional Water Quality Control Board, and the California Department of Conservation.

Each project applicant currently deals with all traffic, cultural resources, reclamation, water quality, and environmental issues during the CEQA process on a project-by-project basis. Leave the current policies in place; do not add more burdens to the mining community.

Aggregates are literally the building blocks of the construction industry. Adding costs and duplicating regulations ultimately raises the cost of every commercial, residential, and public project built. Some of the proposed policies may have severe, negative long-term economic impacts on the mining community and the construction industry at large.

The NCHB does not support any additional regulations on the Mineral Resource industry in Humboldt County, and therefore supports the elimination of this element. No voting chart is submitted on this element by NCHB at this time.

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Energy Element - Chapter 17, Group 2 - This element is an optional element per State General Plan guidelines.

NCHB is commenting in detail on this chapter. Please see our comments following our speech, attached for your reference. We agree with the County that it is a good thing to provide education and information to the residents of our county on the alternative energy sources available, to encourage the use of appliances etc., that are energy efficient, and to provide methods of energy conservation.

We are very concerned about the implementation of this element in its current form. The County says its goal is to provide for affordable housing; if it adopts this Energy Element, in its present form, it will be adopting new standards that contradict its stated goal. It lacks any discussions about the ramifications of its implementation. It lacks an economic analysis: no explanations are given as to how these concepts and ideas would be funded, much less proper justification to do so. A General Plan can and should be likened to a business plan written in the private sector. A business plan drafted in this manner would not likely be successful, nor would the business itself.

The content of this element is disconcerting from the perspective of the context in which it is being presented. NCHB finds most of the narrative tone to be overly subjective, over-reaching, broad, and it lacks clear definitions and the justification needed for anyone to make a balanced informed decision.

It would appear that there are several unmentioned goals being put forth in this Element for the Planning Commission's approval that we find deeply disturbing:

- The creation of a County managed non-profit advisory agency that will replicate responsibilities borne by energy service providers that the Public Utilities Commission oversees. The County is in no position to provide energy services, they are end-users.
- The creation of a County managed non-profit advisory agency that will replicate responsibilities borne by our County Building Department that implements the dictates of Title 24 as well as the Building Codes that are regularly reviewed, updated, and implemented state wide.
- The NCHB adamantly does NOT support any Municipal Utility Feasibility study being conducted to examine the viability of establishing a Municipal utility. If the Supervisors want to explore that potential, that language, that proposal, any action to do so does not belong in the General Plan. Nor would we support any relationship between a municipal utility and the Community Development Services Department.
- NCHB adamantly does NOT support mandatory language wherein an advisory agency provides a **separate public review process** outside of and in addition to the Planning Commission review, and CEQA, and Title 24 for applications.

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- The language found in the draft Energy Element takes on the burden of financial responsibility and liability within the proposed advisory agency when the County cannot afford to even maintain its existing roads, infrastructure or its own buildings without the need to apply for government subsidies to cover the expenditures. We have over \$200 million dollars in deferred maintenance for County roads and drainage systems in this County. The County does not have the revenue to spend maintaining and repairing its own existing roads and drainage systems, much less to be spent on the creation of a new County agency.
- There is also language in the element that discusses the proposed advisory agency managing county wide energy services in times of emergency – earthquakes, storm events and the like. These discussions purport potential responsibilities that are already administered by the County's Office of Emergency Services in concert with the service providers that include emergency planning management with the following service disciplines: local Fire departments, Fire districts, Police and Sheriff's departments, Municipal Water Districts, Community Service Districts, Public Works departments, Hospitals, Schools.

The O.E.S. is under mandate of Federal and State laws to do so. If the Office of Emergency Services is being dissolved, or if the Supervisors want to take emergency planning and response responsibilities away from the County Sheriff's department, that language, that proposal, any action to do so does not belong in the General Plan.

- We are concerned that Staff wants the Planning Commission to assign duplicate oversight and management authority of the implementation strategies of the Energy Element to an advisory agency when it already exists in the process according to state laws: Title 24 and the Building Codes as implemented by the County Building Department. The existence of RCEA is contingent upon the receipt of grant funding. There does not need to be any new County agency created adding to the already burdensome layers of bureaucracy that surround the permit process for development in our county. We have over \$200 million dollars in deferred maintenance for County roads and drainage systems in this County. The County does not have the revenue to spend maintaining and repairing its own existing roads and drainage systems, much less to be spent on the creation of a new County agency.

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Waste Management: CHAPTER 18 - Group 2 - This is an optional element per State General Plan guidelines.

The solid waste provider is the Humboldt Waste Management Authority (HWMA). The HWMA has formulated a joint powers agreement with the County and the most of the incorporated Cities within the County for the disposal of waste. The HWMA has contracted with ECDC Environmental to ship solid waste produced in the County to state licensed land fills located outside of Humboldt County.

Currently solid waste is trucked to Medford, Oregon to a new triple lined state licensed landfill. Ultimately, solid waste is shipped by rail to the State licensed Potrero Hills landfill in Solano County.

Both of these landfills have excessive capacity and can accept the amount of waste generated by this county. Solid waste will be collected and transferred to the HWMA transfer station for shipment to one of the landfills discussed above. Per the current agreements and regulations, the County cannot be served by a landfill with insufficient permitted capacity to accommodate the county's solid waste disposal needs.

Further, the County does not permit any projects that produce products or by-products that violate any federal, state, and local statutes and regulations related to solid waste.

Because waste management is already regulated by the state and others, NCHB would support the elimination of this element from the General Plan. No voting chart was provided by the County, no voting chart is submitted on this element by NCHB at this time.

Air Quality: Chapter 19 - Group 2 - This element is an optional element per State General Plan guidelines.

The North Coast Unified Air Quality Management District (NCUAQMD) is responsible for monitoring and enforcing local and state air quality standards. Air quality standards are set for emissions that may include, but are not limited to: visible emissions, particulate matter, and fugitive dust, pursuant to Air Quality Regulation 1, Chapter IV, Rule 400.

With regard to particulate matter, all of Humboldt County (as well as most of the state of California) has been designated by the California State Air Quality Board as being in "non-attainment" for PM-10 air emissions. PM-10 air emissions include chemical emissions and other inhalable particulate matter with an aerodynamic diameter of less than 10 microns.

According to the draft Air Quality element table found on page 19-14, the highest percentage contributing source of air pollution in our County is our own un-paved roads (47%). Construction and demolition contribute a mere 2%. See table below.

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ANNUAL PM - 10 EMISSIONS - ESTIMATED PERCENT CONTRIBUTION BY SOURCE - Humboldt County, 2005

Source	PM₁₀ Percent of Total
Fugitive windblown dust	1%
Off-road equipment	1%
Electric utilities	2%
Construction and demolition	2%
Manufacturing and industrial	2%
Wood and paper	3%
Ships and commercial boats	4%
Other sources	4%
Paved road dust	10%
Managed burning and disposal	13%
Residential fuel combustion	13%
Unpaved road dust	47%
Total	100%

Source: California Air Resources Board Almanac Emission
Projection Data (2006)

The NCUAQMD has advised that, generally, an activity that individually complies with the state and local standards for air quality emissions will not result in a cumulatively considerable increase in the countywide PM-10 air quality violation. Further, the NCUAQMD has advised that construction projects that incorporate standard construction best management practices, codes and standards that are administered by County Building Department and the Humboldt County Public Works Land Use Division alleviate most impacts.

NCHB thinks the above table speaks for itself, and supports the elimination of this unnecessary element. If the County wants to control air quality we support the County doing so by paving its own roads. NCHB would support the elimination of this element. No voting chart is submitted on this element by NCHB at this time.



General Comments:

A. This is an optional element per the State General Plan guidelines. NCHB would prefer that this and all other “optional” elements not be introduced or adopted at this time. We believe that the existing General Plan is a strong Plan. There are many parts missing and other parts of the existing Plan are antiquated: of utmost importance is the need for an Infrastructure Plan, a Circulation Plan that covers the county in its entirety. To be sufficient, the existing Plan needs to have antiquated parts updated due to changes in the laws that govern land use that have been brought about legislatively, statutorily, or by precedent through case law.

The existing General Plan has not realized its potential due to the fact that a good portion of the Plan has never been implemented. The policies therein are not always recognized or adhered to by staff for projects as is proper under the law. The recent trend by staff is to overlook existing policies of the adopted General Plan, and instead focus its attention and the attention of the Planning Commission to base its decisions based on policies that they would like to see implemented with the General Plan Update in the future. This disregards both the existing General Plan, and of the important role of the Planning Commission in local land use and planning matters.

NCHB are local businesses and employers: material vendors and suppliers, title companies, financial institutions, insurance and real estate agents, architects, civil and structural engineers, building contractors and sub-contractors, developers, and land owners. While we are given a few minutes to comment verbally into the record, and have the opportunity to turn in written comments, the NCHB, its members, and other groups and individuals are observers in this Plan Update process. Staff has yet to include and discuss the input received thus far.

The optional elements are not needed for our *rural* county that are based on costly reports that draw upon policies, standards and implementation measures of *urban* areas. In the cases of some elements or chapters, such as the Energy Element, the expensive and time consuming process undertaken by staff and RCEA produced a draft Energy Element that has nothing in common with the Chapter 17 document currently before you to review. We re-iterate our concern that the General Plan process is moving forward prematurely without a complete infrastructure analysis of the entire county (not just the urban study areas), thereby saving time, money and frustration in not having to go back and amend all of the elements and chapters of the Plan for consistency's sake.

We noticed that Section 1331 of the current General Plan has not been included in the proposed “new” Plan language: “The principal rule to be followed is one of common sense. Taking a comprehensive view of all relevant plan policies, the result must further the intent of these policies, in a practical, workable, and sound manner. Unusual, awkward, and strained solutions are not intended by the Plan and should be avoided. However, new

concepts of development which serve the community and individual needs should be supported in implementing the General Plan. The General Plan should be interpreted in a common sense manner to encourage reasonable development which can meet these needs with minimal impacts on the environment and demands on public services.”

NCHB is deeply concerned that in its efforts to rush through a General Plan that does not make sense, staff has not only caused more money to be spent in producing studies and reports that are not applicable or even contained in their own draft Plan update documents; they have eliminated common sense from the equation all together.

We respectfully request the Planning Commission direct staff to retain this imperative language and follow its lead in the General Plan Update.

B. The content of this element is disconcerting from the perspective of the context in which it is being presented. The title is somewhat misleading; it is not ‘general’ in non-specific terms, it is the local constitution from which all development is guided by you, the Planning Commission, over the next plan period of 20 years or more that the law says needs to be very specific. NCHB finds most of the narrative tone to be overly subjective, over-reaching, broad, and it lacks clear definitions and the justification needed for anyone to make a balanced informed decision. It lacks any discussions about the ramifications of its implementation. It lacks an economic analysis: no explanations are given as to how these concepts and ideas would be funded, much less proper justification to do so. A General Plan can and should be likened to a business plan written in the private sector. A business plan drafted in this manner would not likely be successful, nor would the business itself.

We heard comments made by the Commissioners themselves at the last Planning Commission meeting that referred to the language being too open to too many differing interpretations. We agree. Too often, when policy and implementation measure (or the language of the goals, principles, objectives, standards) language is left “too open” in Plans, when it comes time for staff to complete its thorough neutral analysis, the analysis can be less than optimum – if there are enough vague words or enough vague concepts in the Plan, the analysis itself can be likened to a search by staff for a way to NOT recommend approval for projects, and indeed hold them back from getting to a public hearing in front of the Planning Commission in a timely manner.

When policy and implementation measure (or the language of the goals, principles, objectives, standards) language is left “too open” in Plans, if there are enough vague words or enough vague concepts in the Plan, when it comes time for you as the Planning Commission to discuss the project in a thoroughly informed manner, you have a hard time ‘connecting the dots’ – in your thought process or for the record. How do you know that everything you want to see before you to make a sound decision is indeed before you? How do you know that the nexus that the law requires for project conditions of approval, for fees or other exactions, has been analyzed by staff and included in the staff report or the CEQA document for a project? You don’t.

We have been listening and watching your panel for years struggle with the issue of not having known, defined, consistent concrete rules and boundaries from which to base your decisions on projects. We have seen and heard your appropriate concern that some applicants may be getting preferential treatment, some policies are 'new' and not in the existing plan so you are uncomfortable making a decision, there are no draft documents in front of you to review, some applicants may not be getting adequate treatment, some projects are fine even if staff does not recommend them for approval, and some you deny because you suspect there is something missing or that you don't feel comfortable approving.

Now is the time for you to ask for more information, clarity, and justification from staff in the new General Plan. Now is the time to listen and incorporate public input to make the certain full participation is included in the Plan.

C. The layout and organization of this element is very hard to read and to understand. Policies are written in goal format. The narrative sections of the Element are numbered out of order, the text in some sections is sometimes truncated when compared to the voting tables, the text is sometimes repeated within the voting tables, and is sometimes missing from the voting tables. The voting tables are in numeric order, but sometimes do not include the information from the narrative part of the element, or just includes portions. The Standards Alternatives were included only in the tables and not in the narrative section. Who decided what information went in what section versus what information was left out, or placed at the end of the report? Who decided to mis-represent the numbering system within the narrative of this report?

D. There are numerous reports mentioned that are mentioned that bear no relation to the matter at hand and belong in other forums. Any language herein that discusses the Humboldt County Public Facilities belongs in the Humboldt County Public Facilities Master Plan, not here, in the Energy Element. Similarly, language discussing Charters of outside advisory agencies belong in those agencies' Charter documentation, not here, in the Energy Element. Language is herein mentioning *the State of California Energy Action Plan*; if staff wants to include portions of narrative from that document, to paraphrase it, staff should do so correctly.

E. California General Plan guidelines state that each policy must have at least one corresponding implementation measure. That is not reflected herein. What we do see here that we find disturbing, is a re-stating of goal language before each policy – and the goal language is incomplete. This makes no sense.

F. The Energy Element includes in the voting tables mention of a 'comprehensive energy action plan', and said titled document is attached. We find it interesting that the County states it is concerned about our economic development and then turns around and includes proposed polices in its General Plan update that are iterations of a separate advisory agency that would prove to be economically counter productive to our residents, to the construction industry, landowners and renters. We have over \$200 million dollars in deferred maintenance for County roads and drainage systems in this County. The County does not have the revenue to spend maintaining and repairing its own existing roads and

drainage systems, much less to be spent on the creation of a new County agency. NCHB does not support the inclusion of CAPE in the General Plan or in the Energy Element.

G. Because all of the information that has been drafted for inclusion into the Energy Element is not incorporated into this document, the public and Planning Commission and Board has not been presented the opportunity for a thorough review of all of the pertinent information.

H. It is our understanding that no formal approval of any of the three Sketch Plans ever occurred; only a vote of confidence on a preferred alternative took place (at that time Sketch Plan B was chosen as the "Preferred Alternative"). It is also our understanding that having chosen a preferred alternative, the County did not close the door on further discussion of ideas outside the 'sketch plan' concepts regarding future anticipated growth levels or location. Additionally, it is our understanding that as the Commission, you can exercise your prerogative to edit, delete language from the Plan as you see fit. The existence of a 'preferred alternative' does not limit you from creating a Plan that you feel would be a better Plan other than what is presented by staff, by any of the 'alternatives' or by the public.

I. All elements of the General Plan must be consistent with each other per state law. Although the land use, and circulation elements are not available for public review at this time, we are concerned that energy use issues are "most directly reflected" in other elements and NOT here in the Energy Element itself. For the sake of Plan consistency, any and all information on Energy issues need to be expressly identified and considered in the Energy Element first before being included in any other elements or chapters, wherein those issues then need to be worded precisely the same in all other elements and chapters as worded in the Energy Element itself.

J. Because the goals section is omitted from the voting tables, we will comment on each goal individually, below.

17.1 Introduction – Purpose (page 17-1): *“Energy use issues have been an important consideration in other sections of the plan as well and are most directly reflected in the land use, circulation and air quality elements.”* All elements of the General Plan must be consistent with each other per state law. Although the land use, and circulation elements are not available for public review at this time, we are concerned that energy use issues are "most directly reflected" in other elements and NOT here in the Energy Element itself. For the sake of Plan consistency, any and all information on Energy issues need to be expressly identified and considered in the Energy Element first before being included in any other elements or chapters, wherein those issues then need to be worded precisely the same in all other elements and chapters as worded in the Energy Element itself. In circumstances where item subjects actually are a focus of a separate element, the substantiating justification and reasoning found in the primary element's discussion for that item should be re-iterated herein for consistency's sake.

17.3-F Background – There is only partial information included in this section as it does not include the information from the "Humboldt County General Plan 3-F03-F5: Energy Element

Final Draft, October 3-F005” or from “Humboldt County Energy Element Appendices: Technical Report, October 3-F005”. As such, a thorough review is not possible by the public or by the Planning Commission or the Board of Supervisors.

Strategic Energy Planning – (page 17-3-F): “...*Consistent with this approach, the initially proposed policies, standards and implementation measures proposed by RCEA were sorted into those appropriate for County administration under the General Plan and those appropriately administered by RCEA under their charter...* (underlined text is added for NCHB discussion emphasis only.)

First, with respect to *proposed policies, standards and implementation measures appropriate for County administration under the General Plan:* There is information in this Chapter 17 document that discusses County or Government buildings or other County structural facilities. That discussion belongs in the County’s Public Facilities Master Plan that is under the purview of the County Architect, and is currently being drafted by Daniel C. Smith and Associates. This document is a part of a General Plan Update. The County General Plan is the comprehensive guide for the long term growth and development of the county for the next 3-F0 + years. To include policies in the General Plan document that govern how County buildings are constructed, what materials are used, etc. do not belong in a General Plan, is out of context; it discusses oranges when the General Plan is discussing apples.

Second, with respect to *proposed policies, standards and implementation measures appropriately administered by RCEA under their charter:* Discussion referring to the charter of an advisory agency to the County within the context of the General Plan does not belong in the General Plan. Again, it discusses oranges when the General Plan is discussing apples.

(page 17-3, 3rd paragraph) : “*For a more detailed analysis of existing Humboldt County energy conditions, projections of future energy demands, an assessment of the availability of energy resources and the ability of conservation practices to meet those demands please refer to **Humboldt County Energy Element Background Technical Report, October 3-F005.***”

The detailed analysis of the energy conditions, projections for future energy demands etc. that this paragraph refers to belongs here in this document, for the public, the Planning Commission, and for the Board to review. The missing Humboldt County Energy Element Background Technical Report contains analysis from which informed decisions on this element should be based upon. We would like to see all decisions for this Chapter of the Plan postponed until those decisions can be made based on substantiated information in front of the public and the Planning Commission 30 days prior to the time of the public hearing discussions.

17.3 Goals and Policies - Goals (page 17-3): First, these stated goals have not been included in the tables for voting on or editing that begin on page 17-16. Therefore, we will incorporate our edits directly to the text below.

Second, the language of this section refers to *the State of California Energy Action Plan*. That report is referred to as if it physically exists as hard copy addenda to this draft General

Plan document for the public, the Planning Commission and for the Board to review for the current discussion. The report is not available herein. As such, it is a hypothetical source of information that staff has cited in making its assumptions and in drawing their conclusions that are included in this document. Why is the report not included in this document to be openly formally reviewed and considered by the Public and the Planning Commission? We would like to see all decisions for this Chapter of the Plan postponed until those decisions can be made based on substantiated information made available to the public and the Planning Commission 30 days prior to the time of the public hearing discussions.

E-G1. Develop and implement countywide strategic energy planning.

Integrate energy planning into all county plans and planning activities, in order to maximize the effectiveness and success of energy policies and programs. Promote, coordinate, administer, and/or disseminate comprehensive strategic energy planning at all levels, and with other local governments. Have a long-term energy plan for sustainable energy use and increased self-reliance. Be prepared for emergencies that impact energy supply and transmission. ~~Integrate energy efficiency measures into standards and regulations for land use, zoning, site design, building, and transportation facilities.~~

The last sentence of this section should be deleted because it is duplicative of a system already created and in operation: The implementation of the Building Codes by the Building Department. Building Code implementation accomplishes "strategic energy" planning; comprehensive revisions and updates are made to the Codes statewide on a regular basis.

~~**E-G3-F. Increase energy efficiency & conservation.** Decrease energy consumption through increased energy conservation and efficiency. Increase self-reliance and sustainability by decreasing dependence on non-renewable, non-local energy sources. Increase conservation and efficiency in all sectors: building, transportation, business, industry, government, water and waste management, i.e., in all activities that consume energy. Reduce peak demand through efficiency and load management.~~

This goal should be deleted. We are a population of less than 130,000 people across 3-F.3-F million acres in our County, with no more than 50,000 people in any one given community. There is no consumption rate in our County that is remotely similar to consumption rates of high population urban areas, such as the San Francisco or Portland areas, wherein this language would be appropriate as a mandate for the entire population. We also do not understand how the County or a non-profit advisory agency would go about implementation of this desired outcome because there are not enough specifics provided herein to review. We would like to see all decisions for this Chapter of the Plan postponed until those decisions can be made based on substantiated information made available to the public and the Planning Commission 30 days prior to the time of the public hearing discussions.

~~**E-G3. Increase the supply of energy from renewable sources, distributed generation, and cogeneration.** Have energy from renewable sources as the primary energy supply in the county. Increase distributed generation. Have a~~

~~balanced, diverse array of available energy sources. Increase energy independence by decreasing the purchase and use of non-renewable and non-local energy.~~

This goal should be deleted because it assumes the County is an energy provider; it is not an energy provider, it is an end-user. We have over \$200 million dollars in deferred maintenance for County roads and drainage systems in this County. The County does not have the revenue to spend on maintaining and repairing its own existing roads and drainage systems, much less to be spent for research of alternative energy sources. We also do not understand how the County or a non-profit advisory agency would go about implementation of this desired outcome because there are not enough specifics provided herein to review. We would like to see all decisions for this Chapter of the Plan postponed until those decisions can be made based on substantiated information made available to the public and the Planning Commission 30 days prior to the time of the public hearing discussions.

E-G3. ~~Pursue opportunities for local management of energy supply.~~
~~Develop greater local control over energy supply sources and prices.~~

This goal should be deleted. Why would the County, again, strapped for every dollar it can find for roads and infrastructure (not to mention the feeding, sheltering, and provision of health care services to its resident and transient populations) even begin to ponder taking on the responsibility of managing the local energy supply? The County is not a provider, it is an end-user. The providers have that responsibility per the Public Utilities Commission. If and when companies already established to provide energy services to the County apply for County sources of funding, consider those petitions and applications as they are submitted on a case by case basis. We do not support this goal.

E-G5. ~~Self-sufficiency in energy use.~~ ~~To move toward self-sufficiency in energy use, with maximum reliance on local renewable resources for local energy needs.~~

This goal should be deleted. Again, this language assumes the County is an energy provider; it is not, it is an end-user. We also do not understand how the County or an advisory agency would go about implementation of this desired outcome because there are not enough specifics provided herein to review. We would like to see all decisions for this Chapter of the Plan postponed until those decisions can be made based on substantiated information made available to the public and the Planning Commission 30 days prior to the time of the public hearing discussions.

Policies -- (page 17-3):

Goal E-G1 Strategic Energy Planning: We are not clear why this language is here. Is there text missing from this as a headline or is the inclusion of this text here a typographic error?

E-P1. ~~Regional Energy Authority.~~ ~~Recognize the Redwood Coast Energy Authority (RCEA) as the Regional Energy Authority to foster, coordinate, and facilitate countywide strategic energy planning and education, and administer a Comprehensive Action Plan for Energy.~~

There does not need to be a new agency with advisory authority created adding to the already burdensome layers of beaucracy that surround the permit process for development in our county. We feel the existing system in place at the Building Department works well, and preserves equity and neutrality for the sake of housing affordability. This proposed new bureaucracy would directly effect housing affordability at a time even the Planning Department admits there is a housing shortage.

E-P3-F through E-P7: Numbering is out of sequence. Where are these items located in this document?

~~**E-P8. — Development Incentives. Provide incentives for energy conserving projects (such as expedited permit processing for zoning and permit request) to encourage the generation of local renewable energy that could be offered for sale at competitive prices.**~~

There is already a mechanism in place in the County Code to ask for and receive expedited permit processing at a cost of time and one-half to the applicant on a Board approved basis for those who desire to apply or ask for it. Perhaps the County needs to offer it with every application. With respect to offering for sale excess energy that is produced, it is our understanding that PG & E already purchases energy from homes and businesses that create excess energy. There is no need to write this additional regulation into the County Code.

~~**E-P10. Land use and development review. The energy efficiency of proposed new development shall be considered when land use and development review decisions are made.**~~

We do not support this policy. There is no need to add yet another step to an already overburdened planning approval process when there is already a system in place: there is a section in CEQA that asks questions about energy, and at the Building permit stage of development all projects need to be measured against Title 24 standards and the Building Code standards as mandated in State law.

E-P11, E-P13-F: Numbering is out of sequence. Where are these items located in this document?

~~**E-P13. — Revitalization and reinvestment in existing resources. Support revitalization of and reinvestment in existing core areas (commercial, business, employment, and civic centers). Rehabilitation and revitalization of older existing buildings shall be favored over replacement when doing so would conserve energy resources.**~~

This policy needs to be deleted. First, the language is misleading in that it refers to favoritism for those projects that conserve energy resources. State law that mandates laws that guide development in and for the State of California are to be applied across the board, without showing favoritism of any one project over another. Second, the language implies relation to a redevelopment plan or program managed by the County or an advisory agency; none such agency

or plan exists in Humboldt County. We are not against persons or property owners in the County that invest in rehabilitating or restoring existing buildings and structures.

Additional policies on Strategic Energy Planning that are specific to the charter of a Regional Energy Authority may be found in the Comprehensive Action Plan for Energy (P-3-F, P-3, P-3). (page 17-5):

First, where are referenced items P-3-F, P-3 and P-3?

Second, with respect to the charter of a Regional Energy Authority: Discussion referring to the charter of an advisory agency to the County within the context of the General Plan does not belong in the General Plan. Again, it discusses oranges when the General Plan is discussing apples.

Energy Conservation and Efficiency (page 17-5):

Goal E-G3-F. Energy Conservation and Efficiency. Increase energy conservation and efficiency.

We are not clear why this language is here. Is there text missing from this as a headline or is the inclusion of this text here a typographic error?

E-P13 through E-P33: Numbering is out of sequence. Where are these items located in this document?

~~**E-P33. Municipal Purchasing and Procurement.** Encourage the purchase and use of administrative supplies and building materials made from recycled materials and renewable resources whenever cost-effective (considering life-cycle costs). Purchase or operate Energy Star[®] electrical equipment whenever cost-effective (considering life-cycle costs). Follow principles of energy-efficient source reduction and resource recovery for County operations, and promote these principles in the community.~~

This policy is written for, and focuses on materials and supplies procured for County owned buildings or other structural facility. That discussion belongs in the County's Public Facilities Master Plan that is under the purview of the County Architect, and is currently being drafted by Daniel C. Smith and Associates, is not complete, and therefore not available. The County General Plan is the comprehensive guide for the long term growth and development of the county for the next 3-F0 + years. To include policies in the General Plan document that govern how County buildings are constructed, what materials are used, etc. is out of context; it discusses oranges when the General Plan is discussing apples.

E-P35, E-P33-F: Numbering is out of sequence. Where are these items located in this document?

E-P33. Water Conservation Saves Energy. Commit to the principle that water conservation is also energy conservation given the significant energy required for water pumping, water treatment, and wastewater pumping and treatment.