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June 21, 2007

The following comments are submitted on behalf of The Buckeye Conservancy in regards to Chapters 12, 14 and 15 of the proposed Humboldt County General Plan.

Chapter 12. Conservation and Open Space

CO P1. Greenbelts -

Establishing greenbelts seems to be unnecessary in Humboldt County as they already exist naturally and are protected from development. Examples of this are the numerous streams that are prevalent throughout the county as well as other habitat such as wetlands and other zoning classifications that already exclude development. Establishing greenbelts formally would only serve to codify something that already exists requiring another unnecessary finding or permit.

CO P2. Working Landscapes -

We question the county's proposal to use conservation easements as the correct tool to protect working landscapes. Conservation easements are very complicated and are meant to be a voluntary process. They should not be used in such a broad brush manner for zoning or restrictions.

Regarding the Conclusion on Page 12 - 16:

This statement is an opinion, not a conclusion.

Chapter 14. Biological Resources

14.2 Background -

Under the Sensitive and Critical Habitats section you use the description "a small geographical area". That description needs to be specifically described as to what will be classified as "small".

We question your statement that *Roosevelt Elk Range, Rookery and Nest Sites, Critical Habitat Areas, Streams and Streamside Areas and Coastal Habitats are threatened by loss or reduction in the County*. As far as we know, the County has no policies that are threatening or decreasing the aforementioned habitats.

Overall, the Biological Resources Chapter is acceptable as is in the current framework.

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Chapter 15. Cultural and Scenic Resources

CU P5.

Findings – A. We do not think using the general terminology “representatives of the cultural resources community” should be included here.

CU P7.

County Historical Resource Commission – We question what triggered the proposed establishment of a Historical Resource Commission if anything. We should not be making new regulations for what “might” happen and ask that you exclude this proposed commission from the plan.

Additionally:

Include an exception to minimum parcel size in agriculture zoning for historical preservation purposes similar to what is in the coastal plan.

The Staff has presented no data to support the conclusions they’ve come to.

It appears that the current General Plan is working well, therefore we recommend staying with the current General Plan language as much as possible.

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