



NORTHCOAST REGIONAL LAND TRUST

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Humboldt County Planning Commission
3015 H Street
Eureka, Ca 95501

RE: Conservation and Open Space Element, Humboldt County General Plan

June 21, 2007

Dear Planning Commissioners,

The Northcoast Regional Land Trust (NRLT) thanks the Board of Supervisors, Planning Commission, and Planning Staff for the opportunity to provide feedback on the Draft Conservation and Open Space Element of the General Plan Update (GPU). After reviewing that document, we conclude that most of the relevant issues have been adequately addressed here, or will subsequently be addressed in other elements of the GPU (i.e. agricultural and forest resources). We focus our comments here on two issues that are most pertinent to our own work in the county.

NRLT supports the inclusion of the Recreational and Conservation Easement Program as a cornerstone of the County's efforts to protect open space in the form of working lands, and to enhance recreational opportunities in the form of public access to recreational lands. With support from this program, NRLT is currently working with private landowners to place conservation easements on working ranchlands covering nearly 25,000 acres in the county. Funds from the program are enabling NRLT to leverage the millions of dollars from state and federal programs so that these projects can be successfully completed. The program is also benefiting the efforts of other local land trusts to protect open space and enhance recreational opportunities in Humboldt County.

In recognizing its importance, we think it is important to also acknowledge two important limitations of the County's easement program. First, the rate at which the county's natural resource lands are being broken into de facto rural residential parcels currently exceeds the ability of the county's easement program and local land trusts to prevent such fragmentation. The state and federal dollars needed to purchase conservation easements are simply too few and too slow in coming. Therefore, while the easement program is an important part of any comprehensive approach to protecting natural resource lands in the county, it has practical limitations and other means (as outlined in this Element) are also needed.

The second limitation of the program is that it currently depends on Title III funding that may or may not be renewed in future years. We recognize and applaud the ongoing efforts of the Supervisors to secure and direct Title III funds into the program in the coming year(s). However, if those funds should become unavailable to the easement program, then its viability may be seriously

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impaired or jeopardized entirely. The importance placed upon the easement program in the current Conservation and Open Space Element must be considered in such light. We should all be thinking ahead to alternative source of revenue for this program.

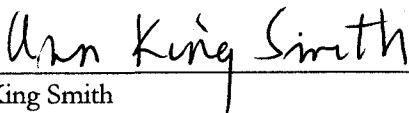
On a separate matter, state planning law provides a detailed description of open space lands by identifying four broad categories of land that should be addressed in the Conservation Element. One of these is Open Space for Outdoor Recreation. Local citizens commonly approach us to express a desire for more recreational access to forestlands located adjacent to the towns and cities in which they live, and we have come to recognize the establishment of community forests as a primary open space priority within our organization. Candidate lands generally fall into the "Forestland-Residential Interface" (FRI) category identified in the Forest Resources chapter of the GPU, and that chapter acknowledges the many conflicts that arise in this zone as a result of interface conflicts.

We believe that the community forest concept provides an excellent mechanism for addressing the following open space priorities: 1) providing recreational opportunities desired by local residents close to the neighborhoods in which they live; 2) buffering industrial forests from the impacts of adjacent urban areas; and 3) maintaining production forestry within the county's forestlands, as is consistent with the community forest model (i.e. Arcata community forest). **NRLT recommends that the Conservation and Open Space Element include a policy stating that the county will support efforts to establish community-owned and managed forests at the forestland /residential interfaces, and particularly those located near our cities and towns.** It is a basic assumption of our work that community forests would be established through a collaborative effort involving willing private landowners.

NRLT's experiences suggest that county-level support will be fundamental to bringing in the state and federal dollars necessary to manifest community forests where they can best serve our open space and forest resource needs. Because it is outside the normal scope of their funding priorities, we cannot hope that state and federal programs will support our efforts to create community forests without strong local support from the counties in which they are being established.

We thank you for the opportunity to weigh in on these matters. If you have any questions or would like further clarification on any matter, please contact NRLT staff at (707) 822-2242.

Sincerely,



Ann King Smith
Vice President