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Re: Comments on Cultural & Scenic Resources Chapter for General Plan Update (GPU)

Dear Respected Officials:

The County's Preliminary Draft Chapter 15 (Cultural & Scenic Resources) is woefully inadequate for the following reasons.

- (1) It does not cite the key State historic preservation laws under which the County is responsible for compliance and enforcement.
- (2) It does not cite current standards for historic preservation.
- (3) It fails to mention the Federally recognized and non-recognized Tribes in the County, which the County must consult with under Senate Bill 18: Traditional Tribal Cultural Places and who are major stakeholders in cultural resources management.
- (4) Local groups, etc. demonstrating an interest in historical resources, local history and heritage tourism are not mentioned.
- (5) Historic County records which are in poor condition and not protected for long term use, nor available for public access, are not identified as needing proper archival care as part of the "whole record."
- (6) The proposed Goals, Policies, Standards and Implementing Measures fall short, such that the 'status quo' will not change - e.g., the process for project review is inconsistent and confusing, no professional oversight, no professional qualification standards, no mention that Tribes need to be consulted about land altering projects subject to CEQA, etc.

As presented in comments submitted 6/13/07 by me as a spokesperson of the Humboldt Heritage Professionals Network (HHPN), I recommend that the GPU adopt the following elements.

1. Provide clear guidance in how the County will carry out its responsibilities for implementing current State laws protecting cultural resources, namely:

- ⊙ Conducting CEQA environmental review for "historical resources";

- ☺ Enforcing laws protecting Native American remains and associated funerary offerings discovered on private and state lands;
- ☺ Enforcing of laws that establish penalties for knowingly disturbing or destroying cultural resources on private land and non-Federal public lands in California;
- ☺ Consulting in “good faith” with Tribes under SB 18 regarding updates and amendments to GP, Specific Plans, zoning changes and newly proposed open space.

2. Take responsibility and action to preserve, manage and make available to the public the County’s historically significant public records, as part of the “whole record” for purposes of identifying historical resources under CEQA.

3. Acknowledge and recognize the broad number of County and region-wide interest groups and public partners in preservation, including Native American Tribes (including Federally recognized and non-recognized) and other government agencies that have in-house professional cultural resources staff and expertise.

4. Acknowledge and adopt state and federal cultural resources management (CRM) standards, including:

- ☺ Requirements for documenting formal records searches of Information Center/CHRIS system authorized by the California Office of Historic Preservation (COHP) and the Sacred Lands File maintained by the Native American Heritage Commission (NAHC);
- ☺ Need to consult historical records and other “evidence in light of the whole record” concerning Humboldt County history found in County Records and other named local repositories;
- ☺ Professional Qualifications Standards for CRM practitioners;
- ☺ Reporting and recording standards per California Office of Historic Preservation (COHP);
- ☺ The need for “good faith” consultation with local Tribes, starting early in the CEQA review process;
- ☺ OPR’s Guidelines for Native American Tribal Consultations under SB 18;
- ☺ Archival Records management practices;
- ☺ Measures for preserving or mitigating impacts to significant historic buildings per the California Historic Building Code and Secretary of the Interior’s Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings; and
- ☺ Other “Best Practices” in CRM, e.g., NHPA Section 106.

5. Adopt GPU Goals, Policies, Standards and Implementation Measures as presented in my 6/13/07 comments on the County’s Preliminary Hearing Chapter 15/Cultural Resources that will ...

- ☺ Implement a comprehensive Cultural Resources Ordinance for purposes of streamlining and establishing consistent policies and procedures for compliance with CEQA;

- ☺ Secure professional oversight of the County's compliance with CEQA and other California historic preservation laws, policies and standards that includes one or more of following options:
 - (1) Hire County Planning staff that has training and experience in CEQA and historical resources;
 - (2) Establish a Commission to advise the County in carrying out their historic preservation responsibilities;
 - (3) Appoint at least two persons to the Planning Commission that are recognized as local CRM professionals.
 - ☺ Designate a County Tribal Liaison as the County's single, knowledgeable point-of-contact for local Tribes.
 - ☺ Take steps to archive, preserve and make available for research "as part of the whole record" the County's historic documents now housed in various facilities without proper archival care.
 - ☺ Establish a GIS based, restricted access inventory of cultural resources under County jurisdiction for use by County and other planners, and consider applying for Certified Local Government (CLG) status under an agreement with the COHP and the National Park Service (NPS).
 - ☺ Review, identify and promote incentive programs for preserving cultural resources by the public.
 - ☺ Promote heritage tourism and appreciation of Humboldt County history.
6. **In addition, "cultural landscapes" need to be referenced in the Scenic Resources discussion as a type of historical resource property that needs to be considered under CEQA review (see previous comments submitted).**
 7. **Consideration and preservation of significant cultural resources needs to be cross-referenced throughout the GPU as an element of the larger planning process (see previous comments submitted).**
 8. **Regardless of which Plan Alternative is finally adopted by the GPU, all of the above will apply because growth will occur and threaten the preservation of significant cultural resources, the laws are in place, and the County is responsible for and needs to establish processes that will demonstrate its ability to oversee legally defensible compliance pursuant to CEQA, etc.**

Thank you for the opportunity to participate and for your careful consideration.

Sincerely,

Janet P. Eidsness