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TO: Humboldt County Planning Commission

HUMBOLDT COUNTY
PLANNING DIVISION

RE: Group 6, Chapter 5 -- Agricultural Resources

Dear Commissioners:

The following are my comments on the Preliminary Hearing Draft of this chapter of the General Plan Update.

In the past several years we have seen the beginning of a revitalization of agriculture as a significant factor in Humboldt County's economy, largely due to the public's growing interest in where their food comes from and how it is produced. Due to Humboldt County's nearly unique combination of mild climate, rich soil, and abundance of water, as well as our generations of experienced farmers and ranchers, we are in an excellent position to make the most of this expanding market.

Additionally, the ability to produce food locally for the people of Humboldt County will help to maintain our self-sufficiency in difficult times, when volatile fuel prices make the cost of food produced elsewhere too high, or when severe weather, landslides, floods, and other natural hazards close Highway 101. Locally grown food, whether organic or conventional, is fresher, tastier, more nutritious, and safer than food brought long distances from unknown producers.

The first thing a farmer needs is good dirt, and plenty of it, for raising healthy crops, whether feed for animals, fruits, vegetables, wine grapes, or flowers. The second thing needed is a safe, abundant supply of water. Without adequate land and water to produce agricultural products, Humboldt County cannot take advantage of new marketing opportunities and the other benefits of vital, diverse, local agriculture. Our General Plan must recognize this and include meaningful goals, policies, standards, and implementation measures to protect our agricultural lands from the pressures of development.

For these reasons, in general I support Alternative "A" but I also have comments on specific points in this chapter.

Policy:

AG-P12. Planned Rural Development: This gives landowners some development potential while minimizing loss of productive land. This must be tied to "**permanent protection of the remainder**" (AG-P11, C) to be meaningful.

Standards:

AG-S2, A 4) -- cumulative impact: It's critical to address the cumulative impact of water withdrawals. Increasing subdivision and development of rural lands have a major impact on watersheds.

C 4) -- Demand for fire protection strains resources of small VFD's. Likewise, the expansion of VFD's will encourage further subdivision. Thus, a spiral of development on rural land is created.

Land Use Classification:

AGR -- Ranchland

Minimum parcel: 160 acres. Minimum parcel size of AGR land has been a point of controversy. It appears that the County has now backed down from recommending a minimum parcel size of 600 acres. Yet paragraph 5.2.2, Background, states that it takes 1760 acres to support a ranch family grazing cattle. 160 acres seems unrealistically small. **Please consider an even more intense version of the PRD (AG-P12, noted above) and other techniques described on p.5.2-21, permitting a higher density of housing on a small percentage of land, rather than allowing subdivision of ranchland to such nonviable small parcels.**

Grass-fed beef is a new, fast-growing, high-dollar-value sector of the agricultural market. To take advantage of this new market, we should protect the productivity of our ranchland instead of subdividing it into parcels too small to support commercially viable ranching.

Compatible Uses for AE, AG, and AGR Lands:

H. Recreation: Make this more specific. "...Uses ... which will not significantly detract from or inhibit ..." is too vague. Hunting, fishing, hiking, and horseback riding would seem to be acceptable. What about ORVs? Public assembly events? More specific definition will avoid misunderstandings, conflict, and misuse.

5.2.5 Implementation Measures

AG-IM3, Williamson Act Contracts: Add to this statement the words "with appropriate monitoring and enforcement." The stated intention to proactively monitor and enforce contracts not only protects agriculture but the right of taxpayers who underwrite the Act to receive meaningful benefit.

Staff Analysis

Background, p. 5.2-11, second bullet point: It's good to "recognize and encourage smaller agricultural operations" and to allow "smaller parcels" in the Williamson Act, if indeed these parcels result in **productive, commercially viable** agricultural operations. It's important to recognize the difference between gardening and hobby farming on the one hand, and commercial agriculture on the other.

P. 5.2-13, third bullet point: Exit strategy -- some standards of proof should be included to define what is meant by "proven to be no longer economically viable." In agriculture, economic viability depends on many factors some of which, like problems caused by weather and fluctuations in product market, may be temporary. The economic needs of a farm household fluctuate over time, as a family grows and then disperses. Although it may be impossible to develop firm standards with so many variables, the County needs to at least establish some reasonable guidelines to assist in the determination of economic viability,

or the "exit strategy" is likely to result in unnecessary loss of productive land as landowners retire or move on to other economic opportunities.

P. 5.2-14, third bullet point: Williamson Act -- While it's true that "participation has not significantly increased" in terms of acreage, the actual number of preserves and individual agricultural operations participating in the Act has indeed increased significantly. By permitting smaller preserves (see "Background," p. 5.2-11, above), particularly for specialty and row crops, which often yield a higher value per acre than beef cattle and dairy, the County has significantly increased the number of farms and farmers participating in the Williamson Act. This means more people in Humboldt County are being supported by agriculture in spite of the very modest gain in acreage.

We should also keep in mind that the purpose of the Williamson Act is to conserve productive, commercially viable agriculture, not merely to get lots of land under contract. Taxpayers, including ordinary homeowners, underwrite State subvention payments that compensate the County for its loss of revenue. Reducing standards in a misguided attempt to bring more acreage under contract not only fails to meaningfully protect productive agriculture, but it will inevitably result in a statewide lack of support and withdrawal of funding for subventions, thus effectively ending the program altogether. We should recall that the Governor initially took Williamson Act funds out of the State's budget for FY 2008, and as this budget remains unresolved at this writing, there still exists a possibility that the Act will not be funded.

Plan Alternatives Comparison Chart

In general I support Alternative A. My "votes" are as follows:

AG-G1 R
AG-G2 R
AG-G3 D

AG-P1 R
AG-P2 D

Predator control programs are not within the purview of the General Plan. This is an issue for other agencies, not Community Development/Planning. Taking a position on this issue will only embroil the General Plan process in unnecessary controversy.

AG-P3 R
AG-P4 R
AG-P5 D

Like predator control, vegetative management programs are the function of other policy-making agencies, not Community Development.

AG-P6 through AG-P10 R

AG-P11 M

Modify by deleting item B. "Logical expansion of an existing adjacent community" is cloudy verbiage that introduces a huge loophole into the plan. Once parcels are converted/rezoned, then the parcels adjacent to them become opportunities for "logical expansion." And so on. This item belongs in Alt C only.

AG-P12 R

This should be included in Alt A as well as B & C. If Alt A supports AG-P11, then logically it must support AG-P12 also. Likewise, A should join B in supporting the two-tiered clustering program at the more restrictive level.

AG-P12a R
AG-P13 D
AG-P13a through AG-P19 R
AG-P20 D
AG-P21 D

AG-S1 through S3 R
AG-S4 D
AG-S5 R
AG-S6 M

Modify the last part of the statement by striking out "adversely affect the area's agricultural economy" and substitute "significantly diminish agricultural productivity of the property as a whole, when compared to the productivity of the original, undivided parcel."

Land Use Designations

AE R

AG R if Alt A -- 160 acres/unit is selected.

If Alt B is selected, I would modify this to delete "20-" and allow only one unit per 160.

Alt C would permit 20-160 acres/unit

AG Density D
AG Subdivision D
AG 2nd Residences D

AGR R if Alt A -- 600 acres/unit is selected

AGR 2nd Residences D
AGR Compatible Uses M

Modify designation H, Recreational Uses, by adding at the end of the statement, "such as hunting, fishing, hiking, and horseback riding. Recreation with the potential to significantly impact agricultural productivity or create environmental impacts, such as recreational off-road vehicle use, public assembly events and the like, will require Conditional Use Permits."

Implementation Measures

AG-IM1 R
AG-IM2 R
AG-IM3 M

Modify to add second sentence: "Provide monitoring and enforcement to protect agricultural and taxpayer benefits."

AG-IM4 R

Thank you for your consideration,



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