



April 12, 2012

John Miller  
County of Humboldt  
Department of Community Development Services  
3015 H Street  
Eureka, CA 95501

*Re: Humboldt County General Plan Update DEIR  
Request for Extension of Public Comment Period*

Dear Mr. Miller:

This office represents Humboldt Coalition for Property Rights with respect to the Humboldt County General Plan Update and Draft Environmental Impact Report ("DEIR"). We look forward to engaging in the public review process to ensure that the proposed General Plan Update and related DEIR are consistent with CEQA and California planning and zoning law.

As a preliminary matter, we request that the County extend the comment period for the General Plan Update DEIR for an additional 45 days. A 90-day comment period is proper here for several reasons. The County released the General Plan Update and DEIR contemporaneously, including substantial appendices and technical reports. Additional time is necessary to review both documents and their appendices, which together constitute more than 2,000 pages of material. In addition, the General Plan Update proposes many new elements that do not exist under the current Framework Plan. The substantial addition of new elements likely stems from the policy to limit amendments under the current Framework Plan. Nevertheless, the public should be allowed adequate time to review and comment on the entire General Plan Update, and the incorporation of new elements extend the amount of time that is necessary for public review.

Furthermore, several appendices, such as the Transportation Analysis, Urban Studies Area Report, and Local Coastal Plan Issues Report, have not been uploaded onto the County's General Plan Update website. While we recognize that there is no firm requirement under CEQA for the County to provide environmental information in electronic format, additional time is necessary to collect and review the underlying documents from their various locations.

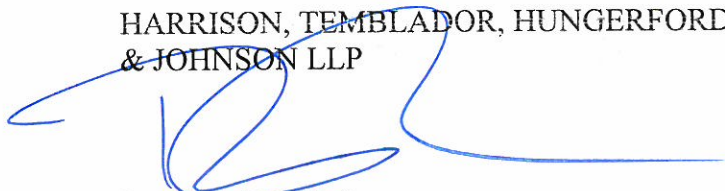
Finally, our records indicate that the State Clearinghouse has not yet received a copy of the DEIR; therefore it is unclear whether the public comment period has officially started. The Humboldt County General Plan Update constitutes a project of statewide, regional or area-wide

significance. (CEQA Guidelines §15206.) This, in turn, requires review and the opportunity for comment by state agencies through submission to the State Clearinghouse. (See CEQA Guidelines §15205(d), requiring that “the review period set by the lead agency *shall be at least as long as the period provided in the state review system,*” and that “[i]n the state review system, the normal review period is 45 days for EIRs” (emphasis added).) Extending the public comment period by an additional 45 days would thus allow the County to correct any deficiencies in this regard.

In light of the above, we request that the County extend the public comment period from May 16, 2012, to July 2, 2012.

Sincerely,

HARRISON, TEMBLADOR, HUNGERFORD  
& JOHNSON LLP



David P. Temblador

DPT/III

cc: Lee Ulansey  
Humboldt County Board of Supervisors