Dear Members of the Planning Commission:

We were pleased to see that the DEIR contemplates use of the new NRCS Soil Survey, to identify prime farmland, farmland of statewide importance and unique farmland in Humboldt County. We anticipate that Humboldt County will be included within the California Farmland Mapping and Monitoring Program (FMMP) after the new NRCS Soil Survey is complete and published. Since the new survey is more complete and clear than information currently in use, inclusion in the FMMP should be viewed as an affirmative action and mitigation measure which should be included as an implementation measure within the agricultural resources section of the plan. The plan should also be modified at AG-SX to include both the Public Resource Code and the NRCS designations and reference to the FMMP.

Currently portions of the new NRCS Soil Survey have been completed and published and are available for the southern portion of the County along with the Ferndale, Loleta and Arcata bottoms. The central and northern portions of the County are nearing completion. Our experience with the published portions of the new survey seem to indicate that the results are very close to full application of the Public Resource Code definition (51201(c) 1-5) found on page 3.2-3 of the DEIR and at AG-SX of the draft plan. It should be noted however that the prime soils layer in the County GIS system is based upon only the Storie Index Rating (SID) and the conversion of field data from the 1965 survey to the USDA Land Capability Classification System. It does not consider the economic productivity criteria of the Public Resource Code definition. The conversion document which area soil scientist Bill Broderson produced for the general plan update in 1984 should also probably be mentioned in this DEIR. In other words the County GIS soils layer probably short changes prime agricultural land in the County in an amount to be determined by comparing the new NRCS Soil Survey when published to the County GIS soils layer. Estimates of this discrepancy might be immediately available by comparing those areas currently published. It is not known what impact this difference may have
on land use designations and zoning in the new plan. It is important therefore that the County GIS layer incorporate the NRCS information promptly as it becomes available in published form.

We believe there has been an omission or error on page 4-58 of the draft plan. Our combined associations submitted testimony June 14, 2010 regarding the Agricultural Exclusive (AE) land use designation and believe that our preferred language was adopted by the Planning Commission. As we recall, staff did present a slide of this language and did, in fact, recommend it. This language is provided again in the following paragraph.

"This plan designation applies to bottom land farms and prime agricultural soils as defined by PRC 51201 c 1-5. It is also used in upland areas to retain agricultural character. It includes additional lands adjacent to prime agricultural soils which presently or historically have been necessary to provide for economically viable agricultural areas. It may include farmlands of local importance as determine by the Planning Commission and Board of Supervisors. Typical uses include dairy, pasture, row crops, field crops, orchards, specialty agriculture and horticulture. Residential subdivision is not supported. Residential uses must support agricultural operation. Density range is 20-60 acres/unit."

At this time we feel this definition should be further modified to include reference to the NRCS determinations of Prime Farmland, Farmland of Local Importance, Unique Farmland and the FMMP. Of particular concern to us was the limitation to "lands that can be irrigated" because many crops are raised in Humboldt County without irrigation.

We believe a further omission or error has occurred in the Agriculture Grazing land use definition as we understood this would include a phrase that some prime agricultural soils are included within this designation.

The Planning Commission had a tied split vote on AG-S2 regarding the minimum parcel size for grazing lands, the difference between the two positions, 40 acres or 160 acres, represents a very significant impact to be evaluated by the DEIR. We understand the position of the Cattlemen, Farm Bureau and Resource Lands working group to be essentially option "D" the existing plan. Section 2723 of the current plan, largely unimplemented, contains a significant impact which has not been addressed in the DEIR.

Lands within ¼ mile of an existing maintained public road could be subdivided to an average of 40 acres. However, most rural roads in Humboldt County were originally developed to serve the needs of agriculture 100 or more years ago. Therefore those roads go through and to some of the most productive lands, including prime agricultural soils. Thus, where this occurs, option "D" would allow subdivision of prime agricultural lands within the AG designation, below the minimums currently specified in the Coastal Plan and some community plans. It would also allow subdivision below the minimum specified in AG-S1 of the project for prime agricultural soils. This could be resolved in two ways. (1) Apply a combining zone to prime agricultural soils within the Agriculture Grazing AG-S2 land use designation to maintain 60 acre minimum parcel size. (2) Alternatively add language to option "D" to state that lands within ¼ mile of an existing maintained public road can be subdivided to an average of 40 acres HOWEVER PRIME
AGRICULTURAL SOILS WILL NOT BE DIVIDED TO LESS THAN 60 ACRES consistent with AG-S1.

Thank you for your support of agriculture in Humboldt County.

Sincerely,

Paul Giuntoli, President
Board of Directors
North Coast Growers’ Association

[Signature]

Everett King
Manager
Southern Humboldt Farmers’ Market Association

[Signature]

Jamie Cohoon
Manager
Fortuna Farmers’ Market

[Signature]

Cc: Board of Supervisors