

Humboldt County Planning and Building Department
Attn: John Miller
3015 "H" St.
Eureka, CA. 95501

June 11, 2012

RE: General Plan Update – DEIR

Following on our letter of (May 8, 2012) and verbal comments (May 17, 2012) to the Planning Commission, we have double checked with the NRCS Soil Survey.

When the General Plan Update process began and even during Planning Commission review of the Agriculture and Resource Lands sections of the plan, it was not known when the new NRCS Soil Survey would be published and available for planning purposes. Draft language in the plan and DEIR refers to continued use of the Public Resource Code (PRC 51201 c 1-5) definition of prime agricultural land with some view to the new survey becoming available.

Currently portions of the new NRCS Soil Survey have been completed and published and are available on Web Soil Survey (WSS) for the southern portion of the County, the Ferndale, Loleta and Arcata bottoms along with some tribal lands and Redwood National Park. The central and northern portions of the County are nearing completion.

At this time the draft plan and DEIR should be modified to include use of both the new NRCS Soil Survey and the Public Resource Code reference above. This means including the terms "Prime Farmland", "Farmland of Statewide Importance" and "Unique Farmland" which are the designations used by NRCS at the appropriate locations in the plan and DEIR.

In future the County may participate in the State of California, Important Farmland Mapping Program (FMMP), so the term "Farmlands of Local Importance" should also be anticipated by the draft plan and DEIR.

In the new survey, when the NRCS designates "Prime Farmland" they consider whether the property is irrigated. This is because the NRCS statewide definition of prime farmland originates from the San Joaquin Valley which would largely be a desert without irrigation. With

sixty (60) inches average annual rainfall and many crops including corn, wheat, pasture, silage, alfalfa, potatoes, tomatoes and melons raised without added irrigation, the irrigation consideration is unneeded and not appropriate in Humboldt County. Parallel with the current survey, all lands designated "Prime Farmland" by NRCS should be treated as such for planning purposes by the County regardless of irrigation. This would also provide mitigation for properties considered "prime agricultural land" within the Public Resource Code definition which may be at risk if not irrigated.

We look forward to publication of the remaining portions of the new NRCS Soil Survey which is both more complete and clear than current information. The draft plan and DEIR should look forward to use of the new survey as well as continued reference to the Public Resource Code.

Thank you for your support of agriculture in Humboldt County.

Sincerely,

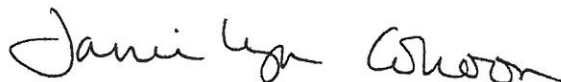
Paul Giuntoli, President
Board of Directors
North Coast Growers' Association



Everett King
Manager
Southern Humboldt Farmers' Market Association



Jamie Cohoon
Manager
Fortuna Farmers' Market



Cc: Board of Supervisors