

Humboldt County Planning Commission
3014 H Street
Eureka, CA 95501

September 17, 2009

Dear Members of the Planning Commission:

This letter follows and updates our previous correspondence of November 10, 2008 and our public testimony on April 30, 2009.

As previously, our comments pertain primarily to tillable soils within the AE and AG land use designations. We have deferred to, and support the modified option B, 160 acre minimum parcel size advocated by the Cattlemen's Association and Farm Bureau regarding Agricultural Grazing (AG) designated lands. Lands designated (AG) should be planned and zoned to maintain practical and useful units for cattle grazing. The 160 acre minimum parcel size will also conserve tillable soils for other commercial agricultural uses.

In our experience 20 acre parcels, regardless of the soil quality, most often become rural residential estates and horse ranchettes, and are thus lost to commercial agricultural production. We continue to support a 60 acre minimum parcel size for all AE designated lands. We recognize the occasional need for immediate family transfer but question whether such 20 acre sub-minimum parcels can be long term sustainable except as part of the larger family operation. We support the conditions proposed for these sub-minimum transfers.

In our testimony of April 30, 2009, we raised issues regarding how the County identifies prime agricultural lands. Item B-20 of the GPU appendix provides the correct Williamson Act definition (PRC-51201(c) 1-5) of prime agricultural lands. This definition is also used in section 2722 of the current plan. The County's GIS mapping utilizes the soil survey criteria, items 1 and 2 of the definition but does not utilize the economic criteria, items 3, 4 and 5 of the definition, to identify prime agricultural soils. Humboldt County has some highly productive tillable lands

which easily meet the economic criteria and should be recognized as prime even though they may have a low Storie Index rating. An example of these are the historically farmed Bayside soils, often diked former tidelands. Some inland soils also meet these economic criteria.

We request that the prime soils definition (PRC-51201(c) 1-5 be moved from the GPU appendix and incorporated in the rural lands or agricultural lands sections together with a policy that this definition shall be utilized in the consideration of environmental effects concerning agriculture in all environmental documents prepared by or for the County. Most of the diked former tidelands located in bottom-land areas of the County, as well as some inland parcels, contain soils that are rated less than prime in the 1964 Soil Survey but which have high economic productive capacity. These lands are to be treated as prime due to historic or current economic agricultural productivity including grazing, hay and forage, orchards and row crops.

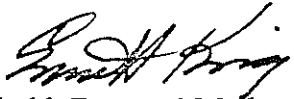
Thank you for your support of agriculture in Humboldt County.

Sincerely,

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



Everett King
Manager
Southern Humboldt Farmers' Market Association



Holly Kreb
Manager
Fortuna Farmers' Market



Cc: Board of Supervisors

Attachment (PRC-51201(c) 1-5)

Williamson Act definition of Prime Agricultural Soil (PRC 51201(c) 1-5)

(c) "Prime agricultural land" means any of the following:

(1) All land that qualifies for rating as class I or class II in the Natural Resource Conservation Service land use capability classifications.

(2) Land which qualifies for rating 80 through 100 in the Storie Index Rating.

(3) Land which supports livestock used for the production of food or fibre and which has an annual carrying capacity equivalent to at least one animal unit per acre as defined by the United States Department of Agriculture.

(4) Land planted with fruit or nut bearing trees, vines, bushes or crops which have a nonbearing period of less than five years and which will normally return during the commercial bearing period on an annual basis from the production of unprocessed agricultural plant production not less than two hundred dollars (\$200) per acre.

(5) Land which has returned from the production of unprocessed agricultural plant products an annual gross value of not less than two hundred dollars (\$200) per acre for three of the previous five years.