

The following excerpts from the Comparison Chart for **4.6 FOREST RESOURCES** contain changes recommended by the Humboldt Watershed Council (HWC)

4.6.3 Goals

FR-G2. Forestland Timber Production. Modified Alt A, B, C A prosperous and sustainable timber industry managing a stable inventory of productive forest lands for timber commercial production and ecosystem values. Ranches and rural homesteads making full use of the timber, forest production products, or forest ecosystem services potential of their lands.

COMMENTS: *Commercial forest products include timber, biomass energy, compost & soil additives, carbon credits, eco & heritage tours, floral greens, mushrooms, etc. Forest ecosystem services include carbon sequestration, climate regulation, clean water, geologic stability, and biological resources necessary to produce and maintain healthy forests, watersheds, and fisheries.*

FR-G3 Stable Land Base. Modified Alt A Forest lands protected from further fragmentation and uses that detract from long-term economic-commercial timber productivity and forest ecosystem values capabilities.

COMMENTS: *Timberlands serve not only to produce timber, but also as carbon sinks, wildlife habitat, groundwater recharge systems, seasonal flow extenders, filters for pollutants, climate and temperature regulators, and as sources for aquatic nutrients and channel structure materials for waterways.*

FR-G5. Infrastructure. Modified Alt A, B, C A public road system maintained for transportation of logs to mills and forest products to market, and sufficient inventory of industrial property to support forest products manufacturing. Wildland fire protection that prevents the protects against loss of timber on private property. Infrastructure cost benefits to private individuals and corporations which do not outweigh public interest nor the public trust values of the environment. **(FRC to ensure against abuse of public) funding**

FR-GX Salmonid Recovery A broad-based, coordinated effort to reverse the decline of wild salmon populations on the North Coast and support their recovery and long-term sustainability, through management and protection of forest lands

4.6.3 Policies

State and Federal Regulatory Issues

(Recommendations for this section were covered in HWC comment of 10-06-09)

FR-PXx. Salmonid Recovery.

Reevaluate all forest land regulations, designations, practices, and infrastructure in light of the imminent need for the recovery and long-term viability of wild salmon on the North Coast

COMMENTS: *Goals, policies, and implementation are needed to support the General Plan guiding principle calling for **unambiguous natural resource protections; especially for open space, water resources, water quality, scenic beauty and salmonids.***

Forest Resource Land Base

FR-P8. Protection of High Quality Timberlands. Modified Alt A Parcels of Timber Site Quality III or higher shall be planned to maintain commercial timber forest products, and forest ecosystem values production as the primary uses. Residential uses shall be limited to individuals employed on the premises for lands planned Industrial Timber (IT) or necessary for the management of timberlands on lands planned Timber Production (T). **(FPZ? or restoration zoning tax breaks for owners who improve forest health)**

COMMENTS for FR-P8, P9, P10, P12, P14: As per Goal FR-G1 ("Public and private forestland producing a wealth of multiple economic and natural resource values") - Non-timber forest products and forest ecosystem services should be included as high value uses of timberlands.

FR-P9. Residential Construction on TPZ Zoned Parcels. Modified Alt B Require continued viability of timber commercial productivity and forest ecosystem values on TPZ zoned parcels containing residences by mitigating the impacts of residences on timber harvesting forest resources, water resources, biological resources, wildland fire potential and public services.

COMMENTS: see above

FR-P10. Substandard Lots. Modified Alt A, B The County shall seek removal of substandard lots from the TPZ designation when residential use becomes the primary use of the property and commercial forest products, or forest ecosystem services production cannot be sustained, on a commercial basis.

COMMENTS: see above

FR-P12. Timberland Ownership. Modified Alt A, B The County shall provide incentives to maintain large-scale land ownerships for production of commercial timber forest products production, forest ecosystem values, and salmonid habitat.

COMMENTS: see above

FR-P14. Public Utilities on TPZ Lands. Modified Alt A, B, C Where feasible avoid locating federal, state, or local public improvements and utilities in TPZ where the project or land acquisition will have a significant adverse affect on the production of timber & other economically and environmentally important forest products and services.

COMMENTS: see above

FR-P15. Conservation Easements and Management. Modified Alt A Support and manage voluntary easement programs that combine conservation management with sustainable timber production commercial productivity, such as restoration zoning, forest restoration management plans, conditional use permits, voluntary easements, transfer of development rights programs, and community forest programs.

COMMENTS:

Infrastructure and Public Services

FR-P19. Maintain Public Roads. Modified Alt A, B The County shall shall work cooperatively with timber producers to maintain public roads and drainage facilities which support log and forest products transportation while minimizing public and

~~environmental costs. The County shall work with timber producers to cooperatively address substandard road conditions and maintenance deficits.~~

COMMENTS:

4.6.4 Standards

FR-S1. Planned Rural Development Program Clustering Incentive Options: Modified Alt A, B, C The Planned Rural Development Program shall be a voluntary incentive based program. To qualify, identified homesite parcels must be clustered to minimize conflicts with ~~timber-commercial~~ harvesting and impacts to water resources, biological resources, wildland fire potential. Right-to-harvest agreements shall be secured on lands proposed for conversion to residential uses. The remaining lands most suitable for continued ~~timber commercial~~ production shall be retained for permanent commercial ~~timber production~~ or ecosystem values

COMMENTS: *As per Goal FR-G1 ("Public and private forestland producing a wealth of multiple economic and natural resource values") - Non-timber forest products and forest ecosystem services should be included as high value uses of timberlands.*

FR-S2. Forestland-Residential Interface (FRI). Modified Alt A , B, C For areas identified as the FRI, reduce use conflicts via the following:

D. Support flood prevention and protection of beneficial uses of water as defined in the North Coast Regional Water Quality Control Board's Basin Plan under the Clean Water Act residential drinking water supplies.

COMMENTS: *This definition of beneficial uses includes aquatic habitat as well as residential drinking water supplies, Supplies for private and public firefighting, as well as emergency services should also be included.*

FR-S4. Timberland Subdivisions for Lands Planned Industrial Timber (IT) and Timberlands (T). Modified Alt A No further subdivision of lands designated as Industrial Timberland (IT) shall be allowed unless residential development rights are conveyed to the County.

Subdivision of lands designated as Timberland (T) to the minimum parcel size may be permitted if the project meets the following criteria:

A. The subdivision will result in significant improvement in sustainable harvest of forest products or improvements in forest ecosystem values. ~~timber production capabilities demonstrated by a sustained timber production assessment consistent with the Forest Practices Act Article 6.75, Section 1091.4.5 to the satisfaction of the Forestry Review Committee.~~

COMMENTS: *HWC recommends expansion of the representation and functions of the Forestry Review Committee to include evaluation of environmental and economic impacts of timberland subdivisions*

4.6.5 Implementation Measures

FR-IM2. Develop Incentive Program to Encourage Timber Production Sustainable Forest Productivity and Forest Ecosystem Health. Modified Alt A, B, C Develop incentives for property owners and forestland managers to support continued-timber-, non-timber forest products, production and management for ecosystem values on forestlands. Support and provide technical assistance to small landowners timber-producers working to maintain timber-commercial and environmental productivity on lands also used as their primary residence.

COMMENTS: *Non-timber forest products and forest ecosystem services should be included as high value uses of timberlands.*

FR-IM3, IM4, IM7. HWC supports Alt A versions

FR-IM8. Streamline County Forest Management Regulatory Requirements. Modified Alt A, B, C Review and streamline processes for hazard tree removal, fire safety hazard reduction, and other forest management activities under County jurisdiction, as long as public input opportunities and protections for other resource values are not sacrificed.

FR-IM9. Coordination of County and State Policies. Modified Alt A, B, C Periodically review policies and regulations to ensure that they are evaluate compatibility with the State Forest Practice Act and State Forest Practice Rules.

COMMENTS: *Due to the state timber regulatory system's failure to protect watersheds, salmon, and endangered species, HWC recommends a cautious approach to cooperation*

FR-IM11. Road Maintenance. Modified Alt A, B, C The County shall systematically monitor, evaluate, and prioritize maintenance needs of main roads and drainage facilities used for the transportation of logs, and seek input and assistance from commercial timber producers and monitor substandard conditions and maintenance needs in cooperation with- in order to minimize fiscal and environmental impacts.

***COMMENT:** *To avoid perception of timber companies receiving priority benefits of public tax dollars*

FR-IMxx. Substandard Lots. Modified Alt A, The County shall initiate the removal of substandard lots from the TPZ designation when residential use becomes the primary use of the property and sustained commercial productivity or restoration of forest ecosystem values cannot be demonstrated sustained on a commercial basis.

FR-IMxx. Forestry Review Committee. Expand the Forestry Review Committee to include representatives of a broad base of disciplines and stakeholders who can provide expert scientific and technical advice to the Planning Commission & staff on biological, economic, & social values which should be considered in the decision-making process

Expand advisory functions of the FRC to include forest ecosystem values, watershed analysis, carbon sequestration, non-timber forest products, Restoration zoning, Timber Harvest Plan review, community forest acquisitions, and conservation easements

FR-IM xx. Timberland Regulatory Review. Use best available science to define factors determining watershed carrying capacity for development in forest lands. -Review and comment on Timber Harvest Plans with impacts to beneficial uses of water and recovery of impaired watersheds.

FR-IMxx Convene a permanent advisory committee for the resotation and protection of viable populations of wild salmon in Humboldt County

Thank you for your attention and for the opportunity to comment.

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