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Humboldt County Planning Commission  
825 Fifth St.  
Eureka, CA

RE: GPU Land Use Element

Dear Commissioners,

I strongly encourage you to adopt Alternative A of the Land Use Element with some modifications described below. Alternative A is the best strategy to protect Humboldt County's timber, agriculture, and open land that cannot be replaced once it has been developed. So many acres have been illegally transformed and strong Land Use policies and ordinances are a couple of ways to mitigate further losses.

I am a farmer who lives in the Titlow Hill Area (several thousands of acres bounded by Hwy 299 / Titlow Hill / Redwood Creek / Russ Ranch) and have seen the area decimated by illegal building, illegal subdivisions, illegal domiciles, "allegedly" illegal agricultural activities, increased traffic, increased noise, increased erosion, etc. (with the greatest impact in the last seven years). The County has failed to abate any of the problems, even after numerous formal complaints were filed and even before a lot of the building had started.

The County's proposed agriculture zoning changes (including reducing minimum acreage requirements to "actual use on the ground") will increase the number of legal parcels by four times in parts of this area (and I am guessing in other unincorporated areas).

- This is a really bad idea to let illegal subdivisions go unabated and then every twenty years change the zoning to match the increased number of smaller parcels.
- The County already has processes in place where a person can purchase two or more contiguous properties and make them compliant.
- It does not make sense to add more people to a remote, high fire danger, high slope instability, and out of emergency services area. Especially since the County has failed to enforce the State's State Responsibility Area Fire Safe Standards that this Land Use document says that the County supports (RL-P4 and FR-P18).

Maintaining large parcels in remote areas also:

1. Reduces land degradation
2. Reduces peoples' exposure to the annual smoke from wildland fires (that lasts for days, weeks, and months)
3. Minimizes costs of providing services
4. Reduces negative impacts to water resources
5. Conserves energy and minimizes carbon/greenhouse gas emissions
6. Increases quality habitat by minimizing fragmented land and residences that are associated with noise, dogs, pesticides, herbicides, roads, and pollution of watershed.

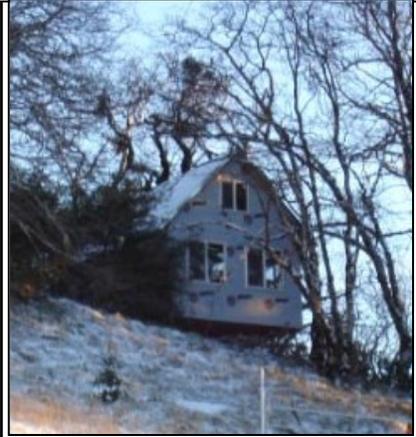


Example of one of the various encampments that grow in the Spring and continue through the Fall. This particular property's folks also used nearby creek as a toilet and for washing machine effluence.

Suggested Modifications:

1. Maintain or increase minimum agricultural parcel size at 160 or more acres.
2. Include funding sources for the proposed programs and their enforcement.

3. Create / increase the penalties for standards, policy, and ordinance violations. Let's not go through another 20-year cycle when hundreds, if not thousands, of acres of land have been negatively impacted.
4. RL-S3 – Cottage Industry Standards should be modified so that they better maintain the rural character of the area, ensure the quality of life of neighboring property owners, and comply with other GPU elements, Federal laws, State Laws, and County Ordinances. As written and just in the Titlow Hill / Chezem area (parcel numbers starting with 316 - approx. 600), we could see 1,200 agricultural acres converted and upwards of 7,500 vehicles every day (with a minimum of 60 roundtrip miles) if the proposed standards are implemented. In keeping with Mendocino and Monterey Counties' Cottage Industry Standards, Humboldt's should have these and additional standards:
  - Two or fewer non-resident employees
  - Two or few daily customers
  - Less than 1,000 square feet of buildings/structures
  - Require a Time-Limited Conditional Use Permit to insure compliance with the Cottage Industry intent and standards and other applicable requirements.
  - For the safety of the customers and non-resident employees, only allow on parcels zoned Rural Residential until the County has a proven track record of enforcing building codes and State Responsibility Area Fire Safe Standards.
  - Change the wording of Item D to the stronger "Do not alter or disturb the rural nature of the premises or its surroundings"
5. Subdivision Standards Item A – Should include proof that there is adequate water for "domestic AND Cottage Industry" use.
6. AG-IM5 Monitor Conversion of Ag Lands – Revise the program so that is pro-active, not reactive (after



House floating above the ground on a ledge/ unstable slope with a driveway built on loose soil with a grade that exceeds the maximum 16% grade allowed per SRA Fire Safe regulations and no clearance around the house.



Mudslide caused by illegal grading. Shut down road access

land already converted).

I hope that in your fiduciary capacity to this County, its citizens, and its visitors that you select Alternative A (including AG-P6 No Net Loss of Prime Agricultural Lands) with modifications.

**"The nation that destroys its soil, destroys itself."** - Franklin Delano Roosevelt

Sincerely,

Marisa D'Arpino (St John)