

October 20, 2009

Ms. Martha Spencer
Humboldt County Planning Department
3015 H St.
Eureka, CA. 95501

RE: comments on FR-P4, FR-P8, FR-S2(D) and (F)

Dear Martha:

These are additional comments to those that I verbally submitted at the Planning Commission hearing on October 15. Thank you for your consideration of such comments.

Comment on FR-P4 – Broader use of non-industrial timber management plans.

I strongly support this policy. Indeed, at the recent Redwood Summit my colleague Mark Andre suggested that in return for increasing the acreage limit for NTMP's, that the owners would have to carry more stocking as the acreage increased.

Comment on FR-P8 - Parcels of Site III or higher shall be planned to maintain timber production as the primary use

I strongly support this policy – these are obviously the most important timberlands for producing timber in the county. As an RPF managing a 2,200 acre property that is managed for timber production and the production of ecosystem services, it is very important to maintain timber supply. A serious reduction in supply due to high quality timberland being converted into rural housing and rural subdivisions might so reduce timber supply such that one of the two main redwood sawmills might shut down which would be devastating to SMALL local timberland owners.

Comment on FR-S2 D. Support protection of residential drinking water supplies [in FRI areas].

I am concerned with this recommendation. The 2,200 acre property that we manage in the Fieldbrook area already has substantially greater protections along watercourses than required under the FPR's. I would support this provision more whole heartedly if it were revised so that it only applied to parcels that will be subdivided (or built upon) in the future, and not to existing property being managed for timber production.

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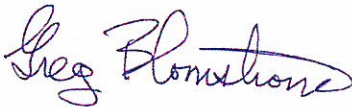
Comment on FR-S2 F Support noticing requirements of affected property owners for prescribed burn activities [in FRI areas].

This provision is unclear to me as to who would be required to do extra noticing. If the provision were rewritten to require that the AQMD do the noticing that would be more acceptable than requiring current timberland owners in the FRI to do such noticing. However, even if the AQMD is required to do the noticing, it seems likely they would require the air permit applicant to supply the names of immediately adjacent landowners at the time the landowner applied for a special burn permit. Whether the AQMD or the landowner does the noticing, the notices would almost certainly be sent weeks or months in advance of burning, because burn day and burn prescription conditions often occur with little advance warning (e.g. often times we don't know if we can burn the following day until after 2PM the day before). While laudatory, I think this provision should be struck as it has the potential to be either very time consuming and expensive if the requirement is meant to be a "real time" advance notice, or be relatively useless for landowners if the notice is sent weeks or months in advance of burning.

Comment on "timber production" language.

The term timber production is used throughout and is acceptable. However, there are a number of landowners in the county who manage for the production of ecosystem services too. The property that we manage is managed for ecosystem services such as for spotted owls, production of carbon, production of large trees for wildlife etc. At some point in the future when carbon is actively being traded, I am thinking that the county might entertain creating a "district" of timberland producers who might band together to sell huge volumes of carbon credits at the county level to producers such as PG&E, cement manufacturers, etc. With this in mind, I suggest possibly changing the term timber production to "timber production and the production of ecosystem services, such as carbon."

Thank you for your attention to these comments.



Sincerely yours
Greg Blomstrom, RPF.