

July 21, 2010

Humboldt County Planning Department  
Community Development Services  
Attn: Martha Spencer  
3015 H Street  
Eureka, CA 95501

**Subject: Forest Ecosystem Values**

Dear Planning Commissioners,

I write to further address Healthy Humboldt's intent in recommending inclusion of the term "forest ecosystem values" in the Forest Resources chapter of the General Plan.

We support policies that allow flexibility for small landowners who want their land to remain in TPZ by showing active management that is not limited to harvesting trees. Demonstration of active management should include having an approved NTMP, CFIP or EQIP forest management plan, erosion control plan, thinning or fuels reduction plan, fish and wildlife habitat restoration plan, or inspection (with fee to cover cost) showing active forest management.

According to the California Timberlands Productivity Act of 1982 (Govt. Code 51100 et seq):

51101(a) The forest resources and timberlands of this state, together with the forest products industry, contribute substantially to the health and stability of the state's economy and environment by providing high quality timber, employment opportunities, regional economic vitality, **resource protection**, and aesthetic enjoyment. [Emphasis added]

51104 (h) "Compatible use" is any use which does not significantly detract from the use of the property for, or inhibit, growing and harvesting timber, and shall include, but not be limited to, any of the following, unless in a specific instance such a use would be contrary to the preceding definition of compatible use:

- (1) Management for watershed.
- (2) Management for fish and wildlife habitat or hunting and fishing.

Below is a summary of Healthy Humboldt's Policy Alternative recommendations on adding the term "forest ecosystem values" in the draft Forest Resources chapter<sup>1</sup> of the General Plan Update. These recommendations were submitted on March 9, 2010.<sup>2</sup> We hope that this will assist you in considering the importance of forest ecosystem values for future generations.

**FR- G3 Stable Land Base.** Forest lands protected from further fragmentation or subdivision into parcel sizes that ~~cannot economically sustain~~ degrade timber production as the ~~primary use~~ or forest ecosystem values.

**FR- G4. Incompatible and Conflicting Uses.** Forest lands protected from land uses that are incompatible or conflict with ~~their primary use~~ forest production or ecosystem values.

<sup>1</sup> April 1, 2009 Plan Alternatives Voting Chart

<sup>2</sup> (~~strikethrough~~ = deletions, underlined = additions)

**FR- S4. Timberland Subdivisions for Lands Planned Industrial Timber (IT) and Timberlands (T).** 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 improvements in timber production and forest ecosystem values 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; and
- B. Adequate access, water, and geologic stability can be demonstrated for the proposed use and the land division meets all other regulatory requirements, including the General Plan standards and policies for rural lands; and
- C. On each parcel, the residential site is located, to the fullest practical extent, in areas of the lowest productivity, and that will not degrade forest ecosystem values or beneficial uses of water.
- D. Access to the remainder is consistent with the uses of the remaining property.
- E. ~~A joint timber management plan (JTMP) is prepared for divisions below 160 acres.~~
- F. Protection of salmonids, their habitat, and water resources.

**FR- P3. Timber Management Regulations.** Support fewer, more effective and lower- cost timber management regulations as a strategy to maintain timber production as the primary economic use of forestlands. ~~Coordinate~~ Update County policies so they are compatible with the State Forest Practice Act and State Forest Practice Rules.

**FR- P9. Residential Construction on TPZ Zoned Parcels.** Preserve continued viability of timber production on TPZ zoned parcels by requiring demonstration of active management for timber production or forest ecosystem services prior to issuance on new residential permits and by mitigating the impacts of residences on water resources, biological resources, salmonid habitat, wildland fire potential and public services.

**COMMENTS:** Demonstration of active management on non-industrial TPZ lands should include one of the following: NTMP, CFIP or EQIP forest management plan, erosion control plan, thinning or fuels reduction plan, fish and wildlife habitat restoration plan, etc., or inspection (with fee to cover cost) showing active forest management.

**FR- P11. Lot Line Adjustments.** Lot line adjustments of substandard TPZ parcels may be approved in order to consolidate logical timberland management units and to protect forest ecosystem values.

**FR- P12. Timberland Ownership.** The County shall provide incentives to maintain large-scale land ownerships for commercial timber production, watershed restoration, forest ecosystem values, and fish and wildlife habitat.

Thank you for your consideration of these points and all the work you do on behalf our community.

Sincerely,



Elizabeth Conner  
Healthy Humboldt

*Healthy Humboldt is a group of conservation organizations and individuals working for a County General Plan that provides affordable housing and transportation choices. We must protect our working farms, ranches and forest lands and keep our water clean and healthy for future generations.*