

Humboldt County Planning Commission
3014 H Street
Eureka, CA 95501

March 16, 2011

Dear Members of the Planning Commission:

This letter addresses Section 10.2 Open Space and provides additional information and clarification of our comments last Thursday. Some comments on Sections 10.3 through 10.7 are also included.

CO-P3 Conservation Easements

It is not necessary for the County to develop a conservation easement program although this issue could be related to the clustering and density bonus provisions in the Resource Sections of the plan. The development of voluntary conservation easements is the work of land trusts and funding agencies.

There is no market for temporary or "term" conservation easements because funding agencies and land trusts seek to establish a lasting benefit for their money, rather than something more like an agricultural subsidy. As a matter of policy our combined associations ask that the County promote the permanent protection of prime agricultural lands through voluntary conservation easements.

Drop the words "and develop" from option B.

CO-P7 Encourage Private Outdoor Recreation

Our comments on the GPU process have focused primarily on prime agricultural lands, the approximately 3% of the land area of the County most suited to producing large quantities of



food. This resource is defined by the capability of these soils to sustain planting and harvesting of crops.

Recreational uses have a greater impact on prime agricultural lands than on range land or forest land. Even a single annual recreational event and parking can eliminate 95% of the agricultural uses for which prime agricultural land would otherwise be capable. The timing of such events usually conflicts exactly with the time when crops are grown and harvested in Humboldt County. There have been several major conflicts within the County concerning the conversion of prime agricultural lands for public assembly recreation.

This policy, as modified and supported by the Resource Lands Working Group is too weak because it could be interpreted to allow the conversion of up to 49% of a property for recreation. We suggest the following:

(Suggested language)

CO-P7 Encourage Private Outdoor Recreation---Encourage private acquisition, development and management of outdoor recreational services and facilities as a means to generate economic returns from conservation of open space lands where such recreational uses do not reduce the agricultural capability or timber productivity of lands planned and zoned for agriculture or timber.

(End suggested language)

Consistency with the agriculture provisions of the Resources Element, specifically retaining agricultural lands in large parcel sizes, also supports the Open Space Element of the Plan. In addition to providing sustainable units for a diversity of agricultural uses, such lands have greater flexibility for protection of biological resources, critical habitats, and contribute to the County's scenic landscape.

We have reviewed Sections 10.3 through 10.7, including Biological Resources, Mineral Resources, Waste Management, Cultural Resources and Scenic Resources. At this point we have the following comments.

Section 10.6, Cultural Resources

Reference should be made to Section AG-S5 which pertains to historic structures.

Section 10.4, Mineral Resources, MR-P12 Off-Channel Terrace Mining

In our view there are bountiful sand and gravel resources along the major rivers in Humboldt County below the annual average high water mark. In some cases removing sand and gravel in excess of annual recruitment may be considered beneficial. There is no need to mine terraces along the rivers which are also some of the County's most productive agricultural lands.

The creation by mining, of a permanent wetland or open water would be an agricultural conversion requiring mitigation.

We support option A, a prohibition of terrace mining on lands planned for agriculture. This prohibition should also include the stripping and removal of topsoil from any property planned for agriculture.

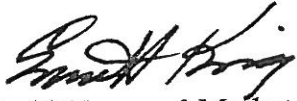
Thank you for your support of agriculture in Humboldt County.

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