

Humboldt County Planning Commission Hearing
March 17, 2011

RCWD
03/17/11

Testimony by: David Imper, Ecologist; (707) 825-5112
Representing: US Fish and Wildlife Service, Arcata, CA
Subject: Humboldt County General Plan Update, Biological Section

Message: Support for proposed policies, standards and implementation measures that:

- improve consistency and cooperation with the Federal and State Resource Agencies and,
- encourage a proactive, rather than reactive, role in endangered species recovery/habitat conservation, which will lead to:
- reduced planning conflicts and project disruptions, and
- reduced costs to the County and the public.

- **Promote T&E Species Recovery and Habitat Conservation to Facilitate Delisting**

BR-G1: Alternative A promotes T&E species recovery, eventually eliminating future costs & Fedl/State intervention. Alternative C would not contribute to recovery and delisting.

BR-P2: Alternative A or B would avoid impacts to Fedl Critical Habitat, reducing cost and Fedl intervention. Alternative C would not contribute to recovery and delisting .

- **Promote Early Coordination with Resource Agencies Critical to Streamline Planning**

BR-S2: Alternative A or B would require resource agency consultation, and help avoid unforeseen delays/cost.

BR-IM3: Alternative A supports on-staff biological expertise and/or early coordination with resource agencies, which is the single most important factor to reduce planning conflicts.

- **Promote Early Wetlands Recognition and Consistency with Trust Resource Agencies**

BR-P7: Alternative A or B would mandate early wetland recognition for projects; when warranted, delineations by qualified biologists using CDFG criteria; both will streamline planning and avoid delays.

BR-S11: Alternative A or B would define wetlands consistent with Federal & State Trust Resource Agencies, reducing project delays/cost, and Fedl/State intervention.

Alternative C would define wetlands under the Corps of Engineers definition, which does not protect many important wetland functions, and may lead to delays and increased costs.

- **Eliminate Redundancy by Excluding Some Activities from Sensitive Habitat Policies**

BR-S1: Alternative A rightly excludes activities from sensitive habitat policies that are otherwise regulated.

Alternatives B-D exclude Agricultural Operations (Item D), which are not otherwise regulated, and should not be excluded. Their exclusion will likely lead to planning conflicts, delays & increased costs.

- **Develop Solutions to Current Planning Headaches**

BR-IMx and IMx2 would support development of a Natural Communities Conservation Plan, Habitat Conservation Plan, and a local wetlands mitigation bank, all of which will help reduce local planning conflicts.