



Humboldt County
Planning Commission
Community Development Department

March 23, 2011

Dear Commissioners and Staff,

Humboldt Baykeeper thanks you for your years of hard work on the Humboldt County General Plan Update and for the opportunity to comment on Section 10.3, the Biological Resources Element.

Increased protection for riparian areas is critical to reduce impacts to water quality and salmon habitat. Riparian vegetation filters pollutants and reduces erosion by absorbing stormwater runoff

Humboldt Baykeeper supports Alternative A for BR-S5 because it classifies streams as fish bearing and non-fish bearing, rather than creating different levels of protection for streams inside and outside urban development areas. Fish-bearing streams in urban areas certainly need adequate riparian buffers to reduce impacts from stormwater runoff.

Alternative A for BR-S5 is also more protective of water quality and salmonid habitat because of wider riparian buffers than current standards. This extension will mitigate limiting factors for salmonids in Humboldt Bay including, degraded in-stream habitat (especially in low gradient reaches that are essential for salmonids), diminished riparian habitat which leads to erosion bank destabilization, lack of cover and complexity necessary for fish habitat, and reduced channel capacity and altered channel morphology, as identified in RCAA's Humboldt Bay Salmon and Steelhead Conservation Plan in 2005.

Alternative A for BR-S5 is critical because it defines the width of SMAs to areas of significant riparian vegetation adjacent to the buffer zone and does not limit the width to a 200 ft horizontal distance in landslides and areas of soil instability as stated in Alternative B.

Humboldt Baykeeper supports Alternative A for IM3 because it is critical to have a qualified biologist conducting site visits, reviewing applicant prepared biological reports, and formulating and monitoring project conditions and mitigation measures. These skills require extensive knowledge and a qualified biologist will be more efficient and effective than training someone to do the job on site and then missing important details which then needed to be re-assessed.

Thank you again for your hard work and for allowing Humboldt Baykeeper to comment.

Sincerely,

Beth Werner, Coastal Advocate