



Humboldt County  
Farm Bureau



Humboldt-Del Norte  
Cattlemen Association

RCWD 3/24/11

Commissioner Mary Gearheart, Chair  
Humboldt County Planning Commission  
3015 H Street  
Eureka, CA 95501-4484

March 24, 2011

***RE: Comments on Draft of Part 3, Chapter 10, Section 10.3 Biological Resources of the Humboldt County General Plan Update***

Dear Chair Gearheart and Commissioners,

Thank you for the opportunity to participate in the process of updating the Humboldt County General Plan. With this letter we are submitting our detailed written comments on section 10.3 Biological Resources of the draft General Plan Update. Our comments and suggested changes are shown in ~~strikeout~~ and blue within the comparison chart for your easy reference.

The main points of these comments are:

- Many of the options are duplication of existing measures. The terms Critical Habitat and Essential Habitat have specific meaning under State and federal law and should not be used in this application. We have therefore modified the definition of Sensitive Habitat to exclude the terms Critical and Essential because of their application in federal and State law. Under permits, the applicant must ensure that take of a threatened or endangered species won't occur. The process structure is such that the County refers appropriate applications to the trustee agencies.
- It is important that Agricultural landowners have the flexibility to operate in the SMAs where the activities do not have significant adverse impacts.
- Expansion of SMAs is a conversion of use from agriculture to habitat. There is science that managed grazing with in riparian zones is beneficial.
- The streamside management areas provisions of the grading ordinance exempt timber operations and related activities under the Forest Practice Act.
- A Countywide HCP is not realistic.

Please feel free to contact us if we can be of assistance. Thank you for your consideration of our comments.

Sincerely,

**Humboldt County Resource Lands Working Group**  
*The Buckeye ~ Humboldt County Farm Bureau*  
*Humboldt Del Norte Cattlemen Association ~ Large Timberland Owners Group*  
*Forest Landowners of California (Humboldt Co. Representatives)*

Enclosure

CC: Planning Commissioners: Denver Nelsen; Mel Krebs; Ralph Faust; Linda Disiere; Susan Masten; Bruce Emad;

Staff: Kirk Girard; Tom Hofweber; Martha Spencer