

April 10, 2011

Humboldt County Planning Commission
3015 H Street
Eureka, CA 95501

**RE: Support for Working Group Comments on General Plan Update (GPU), Part 3,
Chapter 10.6 Cultural Resources**

Dear Commissioners,

We, the undersigned support the comments and suggested language for Alternatives A and B of the General Plan Update for Cultural Resources submitted by Eidsness and Stanton on March 22, 2011.

Collectively, we favor **Alternative A** as it reflects Best Practices for the identification and protection of cultural resources, and closely follows widely accepted processes for CEQA compliance adopted by counties throughout California.

Important Key Points for adopting Alternative A include:

- 1) **A Cultural Resources Commission or Committee** in lieu of a Certified Local Government (CLG) to assist staff and the Planning Commission in the identification and protection of significant cultural resources, and to help educate the community about the economic, heritage and other benefits of preserving our County's cultural places and the process for County review for compliance with CEQA and historical resources. (CU-Sxx)
- 2) **CEQA Review Process** for properties 50 years or older to identify the potential for significant cultural resources and methods to avoid substantial adverse change. (CU-Sxxx)
- 3) **Cultural Resources Reports** for properties 50 years or older that appear significant upon preliminary review and require additional research and analysis to determine California Register eligibility per CEQA. (CU-S5)

Additionally, Alternative A should include:

- 4) **A Cultural Resources Ordinance** to provide a framework for CEQA implementation to include a two-tiered review process: 1) Initial Screening, and 2) Cultural Resources Report if known or potentially unknown significant resources are identified. (CU-P2)
- 5) **Overlay Zones** for Culturally Sensitive Zones (including Cultural Landscapes) especially in rural, inland areas outside the Coastal Zone to expand the County's review of projects that may affect known and unknown cultural resources. (CU-P1)

Respectfully Submitted,

Eli Sanderson Elijah Sanderson #300 Center St.
Thomas Orr Thomas Orr Rio Dell, CA 95562
50 Bear River Dr.
Loleta, CA 95551