



Humboldt County  
Planning Commission  
Community Development Department  
3015 H Street  
Eureka, CA 95503

October 5, 2011

Dear Commissioners and Staff:

Humboldt Baykeeper thanks the Humboldt County Planning Commission and staff of the Humboldt County Planning Department for its years of dedication toward updating the General Plan, which is critical to guide our County over the next two decades. We submit the following comments regarding the Safety Element on behalf of the Board and staff of Humboldt Baykeeper, which works to protect and restore water quality and coastal resources for the health, enjoyment, and economic strength of the Humboldt Bay community.

**I. Sea Level Rise:** Hazards from increased flooding, erosion, tsunami runup, and storm surges must be quantitatively considered in geologic and other engineering technical evaluations of new development to protect public safety, property, and critical infrastructure.

We support the adoption of S-PX4 with the addition of language regarding sea level rise hazards:

**S-PX4. Development on or Adjacent to Coastal Bluffs and Beaches.** Allow development in areas immediately adjacent to coastal bluffs and beaches only if it can be demonstrated by a certified engineering geologist that wave action, storm swell, ~~and~~ tsunami inundation, and projected sea level rise using the best available scientific information at the time of review, are not a hazard to the proposed development or that such hazard can be adequately mitigated.

In addition, S-PX4 appears to need a corresponding Implementation Measure. These additions will be consistent with a recent amendment to the County's Humboldt Bay Area Local Coastal Program.

**II. Septic Systems in Floodplains** should consider potential contamination of flood waters to protect human health and the environment. We support the following additional language:

**S-PX3. Construction Within Special Flood Hazard Areas.**

**E.** Septic systems shall be designed in a manner as to prevent instability, ~~and~~ dislodgement, and contamination of flood waters during flood events.

**III. Hazardous Industrial Development** should only be permitted after mitigation measures have been developed for the protection of both human populations and the environment, as well

as approval of a disaster response plan for the project. We support the following additional language:

**S-P25. Hazardous Industrial Development.** Hazardous industrial development may be permitted when ~~either~~:

- A. It includes mitigation measures sufficient to offset increased risks to adjacent human populations ~~and the environment; or, and~~.
- B. Increased risks to adjacent human populations ~~and the environment~~ have been adequately mitigated by approved disaster response plans. (See definition of "hazardous industrial development" in Standards Section below.)

**IV. Allowable Uses in Tsunami Run-up Zones** should specify that only clean, uncontaminated dredge spoils would be allowed to be disposed of in tsunami run-up zones. The Humboldt Bay area was used extensively for years for industrial purposes, resulting in the contamination of Humboldt Bay water column and sediments with various contaminants, including dioxins and furans, PCBs, and metals. Humboldt Bay is currently listed on the Clean Water Act section 303 (d) list as being impaired by dioxins and PCBs. The disposal of any of the dredged materials from Humboldt Bay within tsunami run-up elevation must only be permitted if such materials are shown to be clean. We support the following additional language:

**S-S7. Tsunamis.** New development below the level of the 100-year tsunami run-up elevation shall be limited to public access, boating, public recreation facilities, agriculture, wildlife management, habitat restoration, and ocean intakes, outfalls, pipelines, and ~~disposal of uncontaminated~~ dredge spoils ~~disposal~~.

Thank you for the opportunity to comment on the Safety Element.

Sincerely,



Beth Werner, Executive Director

CC: Jennifer Kalt, Policy Director  
Michelle Smith, Staff Attorney