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Humboldt County Planning Commission
Community Development Services
3015 H Street
Eureka, CA 95501

Comments on the Safety Element of the County General Plan Update

Dear Commissioners,

We submit these comments to assist in your deliberations on how best to protect public health, safety, and well-being by planning for risks related to flood, fire, seismic activity, landslides, erosion, tsunamis, and other natural hazards.

Geologic/Seismic

In Humboldt County, landslides and seismic activity pose substantial risks to public safety, property, public infrastructure and the environment. In order to minimize these risks, we support the following Alternative A policies:

S-PX1. Site Suitability. New development may be approved only if it can be demonstrated that the proposed development will neither create nor significantly contribute to geologic instability or geologic hazards.

S-SX. Require Hydrologic Studies. Require submission of detailed hydrologic and geologic studies for any proposed development that could increase sedimentation of a watercourse or alter natural drainage patterns. Require findings to regulate development in flood prone areas to ensure public health and safety and to preserve the hydraulic and geomorphic integrity of the stream system and associated habitat.

In addition to the proposed language above, we recommend the addition of the following new policies and implementation measures related to landslides and seismic activity:

S-P?. Avoid Known Landslides Areas. Prohibit development in landslide areas and on landslide-prone deposits on steep slopes, except where the required geotechnical report indicates that appropriate mitigation measures can stabilize the site for construction.

S-IM?. Develop and Implement Stability Report Ordinances. Develop and implement ordinances requiring a Stability Report for new construction in areas specified on County slope stability maps, assessment of storm-related landslide damage, and limits to slope steepness. In addition, develop and implement ordinances requiring geological assessment (e.g., Preliminary Soils, Soils Investigation, and Geologic/Geotechnical reports) for new subdivisions and grading permits to identify hazards associated with landsliding.

S-P?. Avoid Development in Fault Zones. Prohibit structures intended for human occupancy (or defined as a "project" in the Alquist-Priolo Special Studies Zones Act and related Administrative Code provisions) within 50 feet of the surface trace of any fault.

Flooding

Building in flood plains puts more people's lives and properties at risk. The increase in impervious cover also eliminates recharge areas and decreases the land's capacity to absorb stormwater – thereby increasing the frequency and intensity of flood events. Stricter limits on new development in flood plains should be imposed to prevent further harm to the public and the environment.

S-PX2. Prohibition of Residential Subdivisions within Floodplain. The creation of new parcels that increase residential density wholly within the floodplain as identified in the most recent FEMA flood insurance rate maps or dam failure inundation areas as delineated in dam failure emergency response plans shall be prohibited.

S-IMX3. Implement Floodplain Ordinances. Develop and implement ordinances that regulate floodplain development to ensure that project-related and cumulative flooding impacts are minimized or avoided through conditions of project approval as required by the ordinances.

In addition to the above Alternative A policies, we recommend the following:

S-S?. Flood Hazard Assessment. On-site and off-site flood related hazards shall be reviewed for all projects located within areas subject to known flood hazards.

S-IM?. Impervious Cover Limits. Develop Impervious Cover Limits in flood-prone watersheds. Impervious cover includes buildings, roads and other surfaces which do not absorb storm water.

S-IM?. Zero Net Fill. Develop a "zero net fill" ordinance to address areas of the unincorporated County that are located within the 100-year FEMA flood hazard zones.

Lastly, we suggest the following minor revision to ensure that information is available not only online, but in the appropriate departments as well.

S-IM2. Hazard Planning Information on the Internet. Maintain countywide hazard land use planning data—such as fire district boundaries, State Responsibility Areas (SRA), hazard areas, and plans on the internet and in appropriate County departments.

We thank you for this opportunity to provide these comments.

Sincerely,

Dan Ehresman, Policy Analyst