

Humboldt County Planning Commission
3015 H St.
Eureka, CA. 95501

October 18, 2011

RE: General Plan Update, Safety Element

Dear Commissioners:

There are four items (three policies and one implementation) within the Safety Element that relate to prime agricultural lands. We support all of these provisions and suggest added language for S-PX3(F) and S-IM8. Most of Humboldt County's prime agricultural lands are located within the flood plain of the major rivers. These policies support agricultural zoning and public safety by maintaining low development density within the flood plain.

- S-P11 Agricultural lands within the flood plain to be retained for agricultural use.
- S-PX2 Prohibition of residential subdivision on parcels which are entirely within the flood plain.
- S-PX3 Provides requirements for construction within the flood plain. The current framework plan considers the hydrologic impacts of fill placed in the flood plain. It does not consider the agricultural impacts of where the fill may be placed. CALTRANS will pay generously for locations to dispose unwanted fill. Some landowners may occasionally attempt to "elevate" their property resulting in loss of agricultural productivity and destruction of prime agricultural lands.

SUGGESTED ADDED LANGUAGE TO S-PX3 (F). "Fill shall not be placed on prime agricultural lands."

S-IM8 Local Hazard Mitigation Plan, the County utilizes the FEMA flood plain maps based upon the U.S. Army Corp of Engineers mapping of previous flood events in Humboldt County. These maps provide the extent of flooding but not the depth of water in specific locations. We are loosing both generational and institutional memory of the 1964 flood. There is a great deal of misinformation and some deliberate misrepresentation, including incorrect flood elevation certificates, regarding the depth of the water and extent of damage in flood plain areas.

SUGGESTED ADDITIONAL LANGUAGE TO S-IM8. "The County shall seek funding to place permanent flood elevation marks in flood prone areas of the County."

(The new flood elevation marks would have NO EFFECT ON EXISTING STRUCTURES even if some appeared to be non-compliant. The purpose is to have accurate, easily visible information and end misrepresentation of flood depth. It is suggested that these marks could be painted on the streets, photographed, and a picture book be kept at the front desk at the planning department.

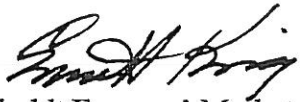
We believe these provisions are also supported by the Resource Lands Working Group. Thank you for your support of agriculture in Humboldt County.

Sincerely,

Paul Giuntoli, President
Board of Directors
North Coast Growers' Association



Everett King
Manager
Southern Humboldt Farmers' Market Association



Holly Kreb
Manager
Fortuna Farmers' Market

