DATE: September 10, 2007

TO: Humboldt County Planning Commission

FROM: Kirk A. Girard, Director of Community Development Services

SUBJECT: Staff Report # 8 for September 20th Meeting

RECOMMENDED COMMISSION ACTION:
It is recommended that the Commission take the following actions:

STAFF RECOMMENDATIONS:
1. Open the public hearing and receive the staff report.
2. Continue taking public input on Group 6 Sections: Agricultural Resources and Forest Resources
3. Provide Commission direction on suggested modifications.

SUMMARY

Planning Commission Review Process
At the Planning Commission’s meeting on August 16, 2007, the Commission received
a staff report on the proposed Agricultural and Timber Resources policies. The Commission received testimony
from 28 people, including 9 written comments. A summary of the public comments is included as Attachment A.
A summary of the Commissioner comments is included as Attachment B. Written comments on the preliminary
draft document received as of September 12 are included as Attachment C.

The Planning Commission requested additional information concerning the data supporting future trends
(regarding “conversions” of resource lands), the inclusion of a “no net loss” policy as an alternative and an
explanation of the difference in the tax rate for TPZ and non TPZ lands. These items have been addressed
below. The Commission also requested a glossary of definitions and using consistent terminology throughout
the chapter. Staff is currently in the process of revising the document which will include a glossary to be
circulated to the Commission during the next comprehensive review of the chapters.

Data Supporting Future Trends

Section 1.4 of the 2003 Forest Resource Technical Background Report (Background Report) discussed trends
for possible conversion of timberlands. This information was subsequently updated in 2005 for the Forestry
Review Committee regarding the increased issuance of Certificates of Compliances (Attachment D).

Examples of trends of possible fragmentations of large holdings that County staff referred to during the August
16th Planning Commission meeting includes:
1. Sale of over 6500 acres of timberlands owned by Eel River Sawmills to private real estate investors in
   2004,
2. Applications for Certificate of Compliances (usually for recognition of patent parcels) received by the
   Department has tripled on timberlands in the last 5 years (recent applications by Barnum Timber
   company alone has included over 23,500 acres of lands zoned TPZ/AE (Barnum Timber holds a total of
   approximately 38,000 acres)).
3. Since 2000, over 67% of all Certificate of Compliance/Determination of Status applications received by
   the County has been on agricultural and timberlands, affecting over 53,000 acres.
4. The Pacific Lumber Company is currently in the process of selling up to 60,000 acres of their
   timberlands to a land development company.
5. PALCO bankruptcy filing. Discussion with the PALCo appraisers have predominately centered on the residential and full buildout capacity of these lands.

The Background Report cites the increase in the issuance of Certificates of Compliances (CC’s) of patents and subsequent approval of Lot Line Adjustments (LLA’s) on TPZ lands as a potential indicator for “conversion”. What should be clarified, however, is that the issuance of a CC or approval of a LLA on resource lands does not necessarily indicate that the land has been taken out of timber production. From a planning perspective, it flags a possibly trend in resource lands that bares closer evaluation. Usually Certificates of Compliances are issued prior to the sale of the property. Historically, this has not occurred in a great extent on industrially owned timberland. These lands have been managed cohesively with little to no residential development on them. Staff is recording an increase in the number of Certificates of Compliance applications that are being submitted on behalf of the industrial timber owners. The study results can be found in Attachment D.

As was indicated during the last Planning Commission meeting, staff will provide a map illustrating the industrial timberlands and the effect of entitlements on these lands with full buildout.

"No Net Loss" Policy

The Humboldt County Farm Bureau submitted comments regarding inclusion of a policy reference to the “No Net Loss” Resolution 92-35 adopted by the Board of Supervisors on March 24, 1992 in the General Plan (Attachment E). This issue was also brought up for discussion during the August 16th Planning Commission meeting. Resolution 92-35 in part provides:

‘...the Humboldt County Board of Supervisors goes on record as supporting the concept of “no net loss of privately owned lands” coupled with the concept that the acquisition of any lands by State and Federal Government shall be offset by lands of equal dollar value sold back to the private sector by the government with “no net loss of revenue” to the government to be created by the transactions.’ (Attachment F)

Staff is proposing to modify Policy AG-P16 to include language reflecting this Resolution to read:

AG-P16 Public Acquisition. Public acquisition of lands designated Agriculture Exclusive (AE) shall be from willing sellers only and shall be on a no net loss basis. Support Lease back options for continued agricultural operations shall be required to offset loss to agricultural production.

Comparison of the taxation rate for TPZ and non TPZ lands

According to staff with the Assessor’s office, timber property is currently selling for approximately $2300 - $3000 per acre. If the property is zoned TPZ, the base share value would be approximately $110 - $120 per acre, depending on the quality of the timber. If it is not zoned TPZ, the tax liability would be 1% of the sales price minus the value of any structures.

To illustrate how this would “pencil out”, the Assessor’s staff provided an example to Planning of a recent sale of 87 acres in an outlying area. The sale price was approximately $510,000. The property contains 48 acres of TPZ with the remainder zoned Ag Exclusive (AE). The tax valuation for the portions of the property zoned TPZ was $114 per acre while the area zoned AE was estimated at $3,000 per acre. If the property did not have TPZ zoning, the tax valuation was estimated at $4,700 per acre for the land value (subtracting out the value of the structures). Therefore the annual tax liability for the AE portion is approximately $1,170 per year; the TPZ portion is $55 per year for a total of $1,225. Without the TPZ zoning the annual tax liability would be approximately $4,000 per year. TPZ tax is set up as a deferment tax and only gets collected when timber is harvested. This tax, known as a “yield tax” is collected on all harvested timber regardless of the underlying zoning.

ATTACHMENTS

Attachment A: Summary of public comments at August 16th, 2007 meeting.
Attachment B: Summary of Commissioner Comments at August 16th, 2007 meeting.
Attachment C: Written comments received as of September 12th, 2007.
Attachment D: Updated Section 1.4 of 2003 Forest Resource Technical Background Report
Attachment E: Comments submitted by Farm Bureau on July 3, 2007
Attachment F. “No Net Loss” Resolution 92-35
Attachment A:

Summary of public comments
At August 16, 2007 meeting.
<table>
<thead>
<tr>
<th>Index #</th>
<th>Synopsis of comments received during Planning Commission meeting</th>
</tr>
</thead>
<tbody>
<tr>
<td>V145</td>
<td>Richard Dom: Humboldt Association of Realtors (HAR); 750+ members; handed out draft of a Right To Harvest ordinance. We recommend it be implemented. In the end, there are going to be maybe 5 different disclosures necessary. The County has a right to create its own disclosure for all property transfers that covers all these areas. We want to help the County develop that.</td>
</tr>
<tr>
<td>W112</td>
<td></td>
</tr>
<tr>
<td>V146</td>
<td>Dan Opalach: Green Diamond Timber Co.; submitted a letter, and read it. It’s difficult to find the data that supports the conclusions. Timber production doesn’t seem to be negatively impacted by residential uses. Looked to the number of harvest plans submitted. Natural Resources report concludes that Lot Line Adjustment and Certificates of Compliance don’t affect timber productivity. There should be a map produced showing the residential use of Timber Production Zone (TPZ) lands. Forestry Review Committee (FRC) could also benefit from such a map. Consequences of policies are huge. FRC should be given a chance to finish their review of the Element. Property owners with Non Industrial Timber Management Plans (NTMP) will result in lower harvest yields – that’s to be expected.</td>
</tr>
<tr>
<td>W113</td>
<td></td>
</tr>
<tr>
<td>V147</td>
<td>Connie Wolfson Bird; Wolfson Blueberry Farm; Described their family situation; wants to subdivide property to provide a place for a family member to help with running the farm. Now it’s not allowed, but there ought to be a way. It’s only 26 acres. Surrounded by smaller lots on 3 sides.</td>
</tr>
<tr>
<td>W114</td>
<td></td>
</tr>
<tr>
<td>V148</td>
<td>Laurie Wolfson &amp; Elaine Wolfson; Wolfson Blueberry Farm; reiterated the above comments.</td>
</tr>
<tr>
<td>W114</td>
<td></td>
</tr>
<tr>
<td>V149</td>
<td>Charles Ciancio; NTMP owner, Registered Professional Forester; submitted a letter. Don’t get hung up on parcel size. A lot of NTMP product isn’t getting on the market because there are too many regulations. Does not support B; supports existing policies. Proper development does not reduce productivity. Development is a benefit on TPZ. Lack of RPF input up to now. Andrea Tuttle doesn’t have hands on experience. Her comments didn’t get peer review. More rules will reduce open space.</td>
</tr>
<tr>
<td>W115</td>
<td></td>
</tr>
<tr>
<td>V150</td>
<td>Shane Green; North Coast Regional Land Trust; submitted a letter. There is a good range of alternatives. Subdivision of TPZ lands and unpermitted residential development has impacts on biological resources; grading, water diversions impact health of the watersheds; pond construction fails, delivers sediment to streams. Cumulative impacts are considerable. If we can’t enforce County requirements now, we need to strengthen that. There are thousands of acres of forest lands impacted by unpermitted development. Supports Goal FR-G2; orderly growth. Planned Rural Development (PRD) program, Transfer of Development Rights (TDR) program could work.</td>
</tr>
<tr>
<td>W116</td>
<td></td>
</tr>
<tr>
<td>V151</td>
<td>Tom Walz; Sierra Pacific Industries; 50,000 acres. Submitted comments. Their markup is recommended. Provides for long term management for timber production while maintaining values. Would be a win win. Existing policies are working well. Public acquisition resulted in the most loss of productivity.</td>
</tr>
<tr>
<td>W117</td>
<td></td>
</tr>
<tr>
<td>V152</td>
<td>Tina Christensen; attended all the FRC meetings. Listen to the timber companies. Representing HAR. Merger ordinance should be rescinded. April 6 letter submitted</td>
</tr>
<tr>
<td>W111</td>
<td></td>
</tr>
</tbody>
</table>
to the FRC; explains why they feel that way.

| V153  | Victoria Copeland; HAR; Forestland Residential Interface overlay. We’re curious about it. Who would be subject to it? Is it the residential or timberland owner; what development standards would be applied; does it change over time? It should be flexible so it follows development outward. Spoke to the reasons for formation of the Buckeye Conservancy – it was a reaction to over regulation, not for protection of timberlands. |
| V154  | Debbie Provol; HAR; Supports 40 acre minimum parcel size in TPZ lands and 20 acre minimum in agricultural lands. Second units should be allowed by right. Does not support creation of an Open Space District or Board. It’s a property rights issue; they should be protected. |
| V155  | Virginia Graziani; submitted written comments; we’re seeing an opportunity to revitalize the agricultural industry in Humboldt County; local, organic products are becoming higher demand; grass fed beef. Need to protect our resource lands to allow for that. Spoke about the PRD program. Resource lands aren’t appropriate for affordable housing; it’s for producing agricultural products. Uses that inhibit agricultural resources needs to be tightened up. Need language for monitoring and enforcement of Williamson Act. I pay more taxes on my ½ acre than large Williamson Act land owners; and I’m willing to do that provided they are using their property for agricultural use. |
| V156  | Mark Lovelace; Healthy Humboldt; Large timberland owners are a stakeholder, but there are others; State law has a high bar for maintaining timberland. TPZ lands are subsidized by the public. It’s not for other non-timber uses. Forested estates should not be subsidized by the public. Subdivision does not work to protect timber productivity. If we make it easier to subdivide, that’s what we’re going to get. Timber productivity is compromised by competing with residential use. Merger ordinance could work if incentives were provided. It’s the only tool the County has to protect timberlands from becoming fragmented. PRD program may work to a limited degree, but we think a TDR program would work better. |
| V157  | John Laboyteaux; wheat is being grown locally for the first time in 80 years; Who would have believed in the success of goat cheese and organic products? My farm is 26 acres; it had a life estate; they were able to farm their part, and I farmed it, and it worked out well. Question of agricultural use on Williamson Act. Is gross product sufficient to pay taxes? – that should be the criteria for whether it is a viable agricultural use. 20 acre parcels are no longer farms if they have substantial residential use. Supports 50 acre minimum parcel size. Likes the options presented for strengthening our resource protection policies. Residential development is appropriated in infill areas. Supports stronger resource protection measures. |
| V158  | Jorie Grundy; President of Cattlemen’s Association. Supports discussion of the development pressure on agricultural lands. Supports policies for protection of agricultural lands. |
| V159  | Katherine Ziemer; Farm Bureau. Will be submitting something in writing. Appreciates the agricultural protection policies. |
| V160  | Butch Parton; Humboldt County Farm Bureau; Resolution 92-135 should be added to the general plan – no net loss of agricultural lands. |
| V161  | Joe Russ; If it ain’t broke, does it need to be drastically repaired? We spent a lot of time working on the Framework Plan. New regulations of TPZ lands are coming from the State. Our family works in both timber and agricultural lands. Supports Industrial Timber owner’s recommendations; supports Alternative C or D. Study of sales of property; value of 600 acre lots were less than 160 acre lots. Buckeye |
| V162 | Miriam Cook; Freshwater; The clearcutting of forests upstream has increased flooding in the area. A 10 year storm now results from a 1 ½ inch storm event. Increased frequency of floods. Causes safety problems. Pools are filled up. There are fewer fish in the creek. We’ve asked a lot of agencies for help, but nothing seems to have changed. |
| V163 | Lisa Brown. Background chapters indicate conversion of thousands of acres of resource lands, and we need to change this. Supports Option A – no net loss. Existing Framework Plan could also function effectively with some revisions. Will be providing written comments. |
| V164 W118 | Jennifer Kalt; CNPS; Grew up in Bay Area. They would have laughed if you said, 20 years ago, that 20 years from now, you’re going to have air pollution and traffic problems. Was surprised to learn there is no open space zoning designation like other communities; would like to see one. Our agricultural and timber resource protection policies serve that purpose. Approval of septic systems near the ocean may result in fecal coliform contamination. Existing State laws are not being enforced. Survey from Humboldt State University; farmers need to expand; residential uses are in conflict with resource production; don’t make it easier to do agriculture. |
| V165 | Joyce King; we need to diversify the FRC. We need to start thinking about the diverse use of forests. There are a variety of uses of forests, such as carbon sequestration, climate control, air quality, a variety of products from non-timber forest products that are increasing in demand. Interested in watershed based planning. Forests are the headwaters of our rivers. If they’re healthy, they’ll deliver water for a long time during the year, and now some of our rivers dry up during the summer. Cumulative impacts aren’t considered by the permitting process. Even if each person, household, businesses is individually held to a certain standard, when there are too many of them, the watersheds collapse. And because we adapt so well and because change is so slow… we need long term effectiveness monitoring for all the mitigations we are proposing. Listed non-timber uses of forest lands. |
| V166 | Hans Pershall; Mr. Ciancio, representatives fro industrial timber know what they’re doing, and they support less regulation. I support that too. Unpermitted development won’t be affected by new policies. If we can’t enforce the existing policies, how are use permit requirements for second units with the new general plan going to be enforced? Second units should be allowed by right. Revised drafts are all broken on the County’s website. |
| V167 | Chuck Harvey; respects private property rights, but markets work best with certain rules in place, i.e. child labor laws. Change is accelerating. Rules need to be set for economic gains. Markets are games with rules. Supports Plan A. We need to conserve energy. We need urbane cities and more rural countrysides. |
| V168 W119 | Kay Backer; HELP; Second units are allowed in McKinleyville, but why not for Blueberry farmowners? Read goal of and described members of HELP group. Diverse group. Staff attempted to influence the FRC with their own agenda. Andrea Tuttle hired to assist with Forest Resources chapter, but she’s not a Registered Professional Forester. Why does the County tolerate the lack of professional work from staff? They were supposed to bring back the exact wording of the FRC and they didn’t. County staff is interfering with the process. They should be allowed to bring forward their own comments, but they should be put alongside those of the FRC. More regulations won’t help with timber productivity. |
| V169 | Christy Wrigley; Elk River has been impacted by timber production. Supports |
conserving natural resource; supports Option A. Questioned the objectivity of the Planning Commission chairman because of his connection to the Pacific Lumber Company.

<table>
<thead>
<tr>
<th>V170</th>
</tr>
</thead>
<tbody>
<tr>
<td>Julie Williams; North Coast Home Builders; they have a diverse group as well. Bob Morris helped her with their comments. Submitted written comments. 5 concerns and solutions: 1 - Substandard TPZ parcels. They were created by the County. Solution is to allow for rezone to appropriate size and use, such as the Forestry Recreation zone. 2 - Withdrawal of timberland. Withdrawn of timberland is caused by governmental acquisition; despite policies not supporting public land acquisition, they allow it. Solution is to apply standards modeled from the Headwaters deal. 3 - parcelization and fragmentation. The size of parcels has been fluctuating over time. Solution: change the zone to fit the parcel size, not the other way around. 4 Disagree with use permit requirement for residences on TPZ zoned parcels. Supports Alternative D, no further regulations</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>W120</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gary Rynearson; FRC member; Registered Professional Forester. The FRC passed a bunch of motions. The last one was to continue deliberations. Want to do a line by line review of the chapter. Will take several meetings. Timber tax is a State tax, which is the value of the discounted flow of the...(I can’t keep up with him) It was supposed to be revenue neutral to the County. Our discussions at the FRC haven’t been about subdivision, it’s been about conversion. It’s a tough question. State law provides for 2.99 acre conversion for a residence.</td>
</tr>
</tbody>
</table>
Attachment B:

Summary of Commissioner comments at August 16, 2007 meeting.
<table>
<thead>
<tr>
<th>Commissioner</th>
<th>Synopsis of comments received during Planning Commission meeting</th>
</tr>
</thead>
<tbody>
<tr>
<td>Murguia</td>
<td>Clarification – most of these timberland protection policies are rooted in existing law, correct? <em>Staff response: yes</em></td>
</tr>
<tr>
<td>Emad</td>
<td>Advice from the agricultural community – is it binding or advisory? <em>Staff response: advisory, but they carry a lot of weight.</em></td>
</tr>
<tr>
<td>Herman</td>
<td>What are the Timber Production Zone (TPZ) requirements in Humboldt? <em>Staff response: parcel size can go down to 40 acres, but if you’re creating lots less than 160 acres, you would need to demonstrate the subdivision improves the timber productivity of the site; no use permit or special permit are required for residences on existing lots zoned TPZ.</em></td>
</tr>
<tr>
<td>Gearhart</td>
<td>Is the marked up Forest Resources chapter the Forestry Review Committee’s (FRC) version? <em>Staff response: Not, it is from the industrial timber owners and submitted to the FRC for consideration.</em></td>
</tr>
<tr>
<td>Kelly</td>
<td>Questions about data supporting the trends mentioned. We heard people say the data doesn’t support the policies. <em>Staff response: Forest resources chapter talks about conversion. Conversion of timberland occurs when residential use becomes the primary use, and timber production becomes secondary. It’s a tricky issue because you can continue to produce timber from lots with homes on them. The large industrial timber land bases are changing. There have been sales of these lands outside of industrial timberland owners. Records on file in the Panning Division on Certificates of Compliance and lot line adjustments indicate a change of use. It doesn’t necessarily mean conversion is occurring, but it’s a step that needs to happen in order for conversion to take place. We’re hearing from timberland appraisers that the residential value of timberland is making it difficult for timber companies to compete in the marketplace with those interested in the property for residential use. And we get a lot of phone calls from people asking about what they can do with TPZ properties if they buy them, and it seems like they aren’t interested in timber production, their focus is on the residential use of the property.</em></td>
</tr>
<tr>
<td>Smith</td>
<td>Does staff have any comment on the Farm Bureau request for a no net loss policy? <em>Staff response: we were planning to put it in the public lands chapter. The no net loss policy that was adopted in ’92 applied to tax revenue to the County; it was intended that land taken out of production by other government agencies shouldn’t impact the County’s tax base. But what you are talking about here is different; it is more directed toward ensuring the productivity of the County’s resource lands is not affected by public acquisition. That policy really should be placed in the agricultural resources and forest resources chapters.</em></td>
</tr>
<tr>
<td>Name</td>
<td>Statement</td>
</tr>
<tr>
<td>--------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Herman</td>
<td>Barnum Timber Company’s application for Certificates of Compliance on 50,000+ acres won’t necessarily lead to conversion. Sales of property by Pacific Lumber have been only those land holdings that were recently acquired, which in some cases had marginal timber value. They’ve kept the core of their timberlands. I get a lot of inquiries of prospective owners of TPZ lands, and most of them go away because of the use restrictions.</td>
</tr>
<tr>
<td>Hansis</td>
<td>Supports staff’s conclusions with respect to Eel River Timber Company lands. People are buying them for residential uses – 160 acre parcels.</td>
</tr>
<tr>
<td>Murguia</td>
<td>We do have to be careful about generalizing. We made some accommodation in no net loss policy to provide for the lease back of resource lands, and continued resource production. Headwaters deal and all public acquisition of forest land only occurred with a willing seller. Need to be careful of not adopting a knee jerk reaction.</td>
</tr>
<tr>
<td>Smith</td>
<td>None of the findings we made with the Fish and Game plan amendment included an analysis of consistency with the County’s no net loss policy, and it should have been. I agree that many, many times, the landowner gets a good deal from the sale of their resource property to public agencies; but not all the time. It’s not necessarily in the community’s best interest from an economic perspective. If the Board has adopted the policy, we should get it into the General Plan.</td>
</tr>
<tr>
<td>Herman</td>
<td>Illegal development is resulting in the conversion of timberlands. We need to separate illegal development from legal development. We shouldn’t change how we adopt our policies just because some people break the law. Maybe there are policies we could adopt to assist with enforcement. TPZ tax subsidy statement is wrong. Now it’s assessed on how you harvest your timber, not the standing timber.</td>
</tr>
<tr>
<td>Kelly</td>
<td>Regarding the Williamson Act – is there any enforcement of that? Staff response: As a result of recent developments, the County is moving forward with increased enforcement of the Williamson Act requirements. The State does an annual audit of those lands; we are helping them with our GIS maps.</td>
</tr>
<tr>
<td>Emad</td>
<td>Reserves comments until the FRC and Farm Bureau reports come in. One area of interest to me that I’d like staff to address is the aging of landowners as a trend. Didn’t see any new solutions in the draft. Regulations don’t really help with that situation, where because of estate tax policy; people have to sell off parts of their resource properties. Staff response: There was a recent study done by Humboldt State University that includes some recommendations to help solve that problem that we can present.</td>
</tr>
<tr>
<td>Herman</td>
<td>We need some definitions in here. Agricultural land versus farmland versus rural land – are these the same? Staff should put together a list of key terms and use them consistently. What is meant by compatible in the policy stating that residential uses will be allowed only when “compatible” with timber production? Is it a discretionary term? More clear regulations will be beneficial to land owners.</td>
</tr>
</tbody>
</table>

Meeting continued to September 20, 2007.
Attachment C:

Written comments received as of noon, September 12, 2007

W121 – September 07, 07 Board of Forestry and Fire Protection
W122 – email September 11, 2007 from Michael Eckhard
August 31, 2007

Humboldt County
Department of Community Development Services
3015 H Street
Eureka, CA 95501

Re: Humboldt County General Plan Fire Safety Element Recommendations

Dear Mr. Kirk Girard:

The State Board of Forestry and Fire Protection (Board) is required to review and provide recommendations to the safety element of county and local government general plans when such plans are being updated. This review is in accordance with Government Code (GC) §65302.5 which requires the Board to review the fire safety element when the general plan update contains State Responsibility Areas or Very High Fire Hazard Severity Zones.

Enclosed is a list of standard recommendations titled “General Plan Fire Safety Elements Standard Recommendations” which should be incorporated into the General Plan. Each entity should evaluate their general plan and include the appropriate recommendations from the list.

Please note requirements for response pursuant to GC §65302.5(b). Thank you for the opportunity to participate in your planning process. We hope this input leads to greater protection and reduced cost and losses from wildfires to the County and adjacent wildlands.

Sincerely,

Stan Dixon
Chair, State Board of Forestry and Fire Protection

Bill Hoehman, Northern Region Chief
Ralph Minnich, Humboldt Del Norte Unit Chief
Wayne Mitchell, State Fire Marshal Office
Allan Robertson, Chief Environmental Coordinator
General Plan Fire Safety Element

Standard Recommendations

August 29, 2007

State Board of Forestry and Fire Protection

Contents

Purpose and Background

Methodology for Review and Recommendations

Standard List of Recommendations
Purpose and Background: The State Board of Forestry and Fire Protection (BOF/Board) is required to review and make recommendations to the fire safety element of general plan updates in accordance with Government Code (GC) §65302.5. The review and recommendations apply to those general plans with State Responsibility Area (SRA) (Public Resources Code 4125) or Very High Fire Hazard Severity Zones (VHFHSZ) (GC 51175).

The statutory requirements for the Board review and recommendations pursuant to GC 65302.5 (a)(1) and (2), and (b) are as follows:

- "The draft elements...to the fire safety element of a county’s or a city’s general plan...shall be submitted to the Board at least 90 days prior to... the adoption or amendment to the safety element of its general plan [for each county or city with SRA or VHFHSZ]."

- "The Board shall... review the draft or an existing safety element and report its written recommendations to the planning agency within 60 days of its receipt of the draft or existing safety element...."

- "Prior to adoption of the draft element..., the Board of Supervisors... shall consider the recommendations made by the Board... If the Board of Supervisors...determines not to accept all or some of the recommendations...," the Board of Supervisors... shall communicate in writing to the Board its reasons for not accepting the recommendations.

Methodology for Review and Recommendations: The Board has created a standard list of fire protection evaluation factors and recommendations related to these factors. The factors and recommendations provide civic planners general plan goals and policies for mitigation of fire hazard and risks. The factors and recommendations were developed using CAL FIRE technical documents and input from local fire departments.

The recommendations on the attached list are the Board's general recommendations for any entity. Each entity should evaluate their general plan using the factors and include the appropriate recommendations from the list.
Standard List of General Plan Safety Element Recommendations

1. **General Plan References and Incorporates County or Unit Fire Plan:** □ Yes □ Partial □ No

   **Recommendation:** Identify, reference or create (if necessary) a fire plan for the entity. Plan should incorporate the general concepts and standards from any county fire plan, fire protection agency (federal or state) fire plan, and local hazard mitigation plan.

   **Recommendation:** Ensure fire plans incorporated by reference into the GP contain evaluations of fire hazards, assessment of assets at risk, prioritization of hazard mitigation actions, and implementation and monitoring components.

2. **Land Use Planning:**

2.1 Goals and policies include mitigation of fire hazard for future development. □ Yes □ Partial □ No

   **Recommendation:** Ensure the fire safe development codes used as standards for fire protection for new development in the VHFHSZ portions of the entity’s jurisdiction meet or exceed statewide standards used for State Responsibility Area in 14 California Code of Regulations Section 1270 et seq.

   **Recommendation:** Include policies and recommendations that incorporate fire safe buffers and greenbelts as part of the development planning. Ensure that land uses designated near high or very fire hazard severity zones are compatible with wildland fire protection strategies/capabilities.

2.2 Disclosure of wildland urban interface hazards including Very High Fire Hazard Severity Zones designations and Communities at Risk designations: □ Yes □ Partial □ No

   **Recommendation:** Specify whether the entity has a VHFHSZ designation and include a map of the zones. Clearly indicate any area designated VHFHSZ pursuant GC 51175. Adopt CAL FIRE proposed Fire Hazard Severity Zones including model ordinance terms and conditions developed by the Office of the State Fire Marshal for establishing VHFHSZ areas.

3. **Housing:**

3.1 Incorporation of current fire safe building codes. □ Yes □ Partial □ No

   **Recommendation:** Adopt the International Fire Code Council Urban Interface Model Code for new development in wildland urban interface areas in State Responsibility Areas or local Very
High Fire Hazard Severity Zones. Adopt newly proposed Title 24 CCR Wildland Urban Interface Building Codes.

3.2 Identification of substandard fire safe housing relative to fire hazard area. □ Yes □ Partial □ No

**Recommendation:** Identify plans and actions to improve substandard housing structure conformance with contemporary fire standards in VHFHSZ or SRA. Plans and actions should include structural rehabilitation, occupancy reduction, demolition, reconstruction, community education, and community based solutions.

3.3 Compatibility of development, construction and building standards relative to access, flammability and fire flow. □ Yes □ Partial □ No

**Recommendation:** Ensure existing residential structures, and other “legacy” substandard residential structures, meet current fire safe ordinances pertaining to access, water flow, signing, and vegetation clearing.

3.4 Consideration of occupancy category effects on wildfire protection. □ Yes □ Partial □ No

**Recommendation:** Ensure risks to uniquely occupied structures, such as seasonally occupied homes, multiple dwelling structures, or other structures with unique occupancy characteristics, are considered for appropriate and unique wildfire protection needs.

3.5 Urban development and wildfire encroachment resistance features. □ Yes □ Partial □ No

**Recommendation:** Ensure residential housing zoning provides minimum fire safe standards, particularly in VHSZH or SRA. For example, zone designations that allow less expensive housing should conform to contemporary fire safe building and development standards.

3.6 Fire engineering structures (sprinklers/alarm). □ Yes □ Partial □ No

**Recommendation:** Ensure new development proposals contain specific fire protection plans, actions or referenced codes for fire engineering features for structures in VHFHSZ. Examples include codes requiring automatic sprinklers in VHFHSZ.

4. **Conservation and Open Space:**

4.1 Identification of critical natural resource values relative to fire hazard areas.
□ Yes □ Partial □ No

**Recommendation:** Determine maximum acceptable wildfire size and initial attack suppression success rates for protection of critical natural resources.
4.2 Inclusion of resource management activities to enhance protection of open space (prescribed burning, fuel breaks, vegetation thinning and removal). □ Yes □ Partial □ No

**Recommendation:** Provide vegetation management fire mitigation measures that provide protection of open space natural resources, reduce fire hazards to adjacent assets, and allow for safe fire suppression tactics.

4.3 Mitigation for unique pest, disease and other forest health issues leading to hazardous situations. □ Yes □ Partial □ No

**Recommendation:** Establish goals and policies that address unique pest, disease, exotic species and other forest health issues in open space areas relative to reducing fire hazard.

4.4 Integration of open space into fire safety effectiveness. □ Yes □ Partial □ No

**Recommendation:** Establish goals and policies for reducing the wildland fire hazards within the entity’s boundaries and on adjacent private wildlands, federal lands, vacant residential lots, and greenbelts. Wildland fuels should be treated in those areas to reduce the intensity of fires. Identify goals and policies for engaging adjacent wildland owners regarding hazard mitigation plans on lands with fire hazards that threaten the entity.

4.5 Policies for dedication, construction and maintenance of systematic fire protection improvements in open space. □ Yes □ Partial □ No

**Recommendation:** Establish goals and policies for incorporating, systematic fire protection improvements for open space. Specifics should include standards for adequate access for firefighting, fuel modifications for open space within and on the perimeter of the entity, mitigation planning with agencies managing open space, water sources for fire suppression, and other fire prevention and suppression needs.

4.6 Urban forestry plans relative to fire protection: □ Yes □ Partial □ No

**Recommendation:** Ensure residential areas have appropriate fire resistant landscapes and discontinuous vegetation adjacent to open space or wildland areas.

**Recommendation:** Evaluate and resolve existing laws and local ordinances which conflict with fire protection requirements. Examples include conflicts with vegetation hazard reduction ordinances and listed species habitat protection requirements.

5. **Circulation and Access:**

5.1 Existing and planned transportation system incorporates requirements for designs that minimize wildfire damage to natural resources and minimizes hazards to human life. □ Yes □ Partial □ No
**Recommendation:** Incorporate adequate access for firefighting, especially for existing "legacy" neighborhoods in VHFHSZ, SRA. Goals for standards for access should be consistent to those in 14 CCR 1270.

5.2 Adequacy of existing and future transportation system to incorporate fire infrastructure elements such as turnouts, helispots and safety zones. □ Yes □ Partial □ No

**Recommendation:** Establish goals and policies for transportation system fire infrastructure elements or otherwise reference appropriate supporting documents where these topics are addressed.

5.3 Adequate access to high hazard areas. □ Yes □ Partial □ No

**Recommendation:** Establish goals and policies that delineate high hazard areas, establish adequate access that meets or exceeds standards in 14 CCR 1270 for lands with no structures, and maintaining conditions of access in a suitable fashion for suppression access or public evacuation.

5.4 Standards for evacuation of residential areas in high hazard areas. □ Yes □ Partial □ No

**Recommendation:** Goals and policies should be established to delineate residential evacuation routes and evacuation plans in high fire hazard residential areas.

6. **Hazard Mapping and Fire Safe Regulations:**

6.1 Fire Hazard Mapping Designations □ Yes □ Partial □ No

**Recommendation:** Specify whether the entity has an official VHFHSZ designation and include a map of the zones. Clearly indicate any VHFHSZ pursuant GC 51175. Adopt CAL FIRE proposed Fire Hazard Severity Zones.

6.2 Adopt or incorporate local fire safe ordinances which meet or exceed standards similar to those in 14 CCR § 1270 for State Responsibility Area. □ Yes □ Partial □ No

**Recommendation:** Establish goals and policies for specific ordinances addressing evacuation and emergency vehicle access; water supplies and fire flow; fuel modification for defensible space; and home addressing and signing.

6.3 Geographic specific mitigation measures for fuel modification and fire risk reduction. □ Yes □ Partial □ No

**Recommendation:** Establish goals and policies that identify structures that have adequate fuel modification or other features that provide adequate fire fighter safety when tactics call for protection of a specific asset (i.e. which houses are safe to protect).
6.4 Fuel Modification around homes. □ Yes □ Partial □ No

**Recommendation:** Establish ordinances in VHFHSZ for vegetation fire hazard reduction around structures that meet or exceed the Board of Forestry and Fire Protection's Defensible Space Guidelines, ([http://www.bof.fire.ca.gov/pdfs/Copyof4291finalguidelines9_29_06.pdf](http://www.bof.fire.ca.gov/pdfs/Copyof4291finalguidelines9_29_06.pdf)) for SRA.

6.5 Adequacy of defense zones. □ Yes □ Partial □ No

**Recommendation:** Establish goals and policies for wildfire defense zones for emergency services including fuel breaks, back fire areas, or other staging areas that support safe fire suppression activities.

7. **Emergency Services:**

7.1 Map/description of existing emergency service facilities and areas lacking services: □ Yes □ Partial □ No

**Recommendation:** Include descriptions, maps, and standards for levels of emergency services. Review, develop or incorporate Local Agency Formation municipal services reviews for evaluating level of service, response times, equipments condition levels and other relevant emergency service information.

**Recommendation:** Incorporate goals and policies that establish emergency services consistent with state or national standards.

**Recommendation:** Ensure new development includes appropriate facilities to assist and support wildfire suppression.

7.2 Assessment and projection future emergency service needs: □ Yes □ Partial □ No

**Recommendation:** Establish goals and policies for new development emergency service needs and ensure appropriate levels of service are established consistent with state or national standards.

7.3 Adequacy of training. □ Yes □ Partial □ No

**Recommendation:** Establish goals and policies for emergency service training that meets or exceeds state or national standards.

7.4 Inter-fire service coordination preparedness/mutual aid and multi-jurisdictional fire service agreements. □ Yes □ Partial □ No

**Recommendation:** Adopt the Standardized Emergency Management Systems for responding to large scale disasters requiring a multi-agency response. Ensure and review mutual aid and cooperative agreements with adjoining emergency service providers.
8. **Post Recovery and Maintenance:** The Recovery and Maintenance recommendations address an opportunity for the community and landowners to re-evaluate land uses and practices that affect future wildfire hazards and risk.

8.1 Reevaluate hazard conditions. □ Yes □ Partial □ No

**Recommendation:** Incorporate goals and policies that provide for reassessment of fire hazards following wildfire events. Adjust fire prevention and suppression needs commensurate for both short and long term fire protection needs. Develop burn area recovery plans that incorporate comprehensive recovery and fire safe maintenance.

8.2 Incorporate wildlife habitat/endangered species considerations. □ Yes □ Partial □ No

**Recommendation:** Establish goals and policies for consideration of wildlife habitat/endangered species into long term fire area recovery and protection plans.

8.3 Native species reintroduction. □ Yes □ Partial □ No

**Recommendation:** Incorporate native species habitat needs as part of long term fire protection and fire restoration plans.

8.4 Evaluation of redevelopment. □ Yes □ Partial □ No

**Recommendation:** In High and Very hazardous areas, ensure redevelopment utilizes state of the art fire resistant building standards with 100 foot set backs (when possible) to ensure adequate defensible space is maintained around structures.

8.5 Long term maintenance of fire hazard reduction mitigation projects □ Yes □ Partial □ No

**Recommendation:** Provide polices and goals for maintenance of fire hazard reduction projects, activities, or infrastructure.

9. **Flood and Landslides:** Recommendations for flood and landslides hazards, risks and vulnerabilities relative to past wildfire should be developed to mitigate potential losses to life, human assets and critical natural resources.

9.1 Establish flood and landslide vulnerability areas related to post wildfire conditions.
□ Yes □ Partial □ No

**Recommendation:** Establish goals and policies that address the intersection of flood /landslide/post fire burn areas into long term public safety protection plans. These should include treatment assessment of fire related flood risk to life, methods to control storm runoff in burn areas, revegetation of burn areas, and drainage crossing debris maintenance.
10. **Terrorist Preparedness and homeland security impacts on wildfire protection:**
These recommendations are included to ensure that terrorist preparedness actions do not substantially increase fire risk or unduly restrict emergency response.

10.1 Communication channels during incidences. □ Yes □ Partial □ No

**Recommendation:** Establish goals and policies consistent with the Governor's Blue Ribbon Fire Commission of 2005 for communications and interoperability. Example goals and policies should address fire personnel capability to communicate effectively across multiple frequency bands and update and expansion of current handheld and mobile radios used on major mutual aid incidents.

10.2 Fire prevention barriers. □ Yes □ Partial □ No

**Recommendation:** Identify goals and policies that address vital access routes that if removed would prevent fire fighter access (bridges, dams, etc.). Develop an alternative emergency access plan for these areas.

10.3 Prioritizing asset protection from fire with lack of suppression forces. □ Yes □ Partial □ No

**Recommendation:** Identify and prioritize protection needs for assets at risk in the absence of response forces.

**Recommendation:** Establish fire defense zones that provide adequate fire protection without dependency on air attack.

End Standard Recommendations  (version 8/29/07)
Spencer, Martha

From: Michael A. Eckhard [michael@trendsetterindustries.com]
Sent: Tuesday, September 11, 2007 9:32 AM
To: Spencer, Martha
Subject: General Plan Update Chapter inquiry

I have had some opportunity to examine the General Plan update and I have a concern that I would like to share with you. As part of our General Plan I feel the county should be making more accessible to consumers as part of the increasing emphasis on sustainability and efficiency. Adoption of the following would make solar systems less expensive and therefore more accessible to consumers without costing the county revenue or incurring any expenses.

I strongly suggest adopting:
Adoption of Appendix L of the Uniform Plumbing Code
Adoption of the 2006 Edition of the Uniform Solar Energy Code (from IAPMO)

Please reply and let me know your feelings on this. I will be delighted to discuss this with you by phone or email at your convenience.

Cordially;

Michael A. Eckhard
TrendSetter Industries
1900 Bendixsen Street
Samoa, Ca. 95564
(800) 492-9276 Toll Free
(707) 442-0110 Fax

No virus found in this outgoing message.
Checked by AVG Free Edition.
Attachment D:

Updated Section 1.4
of the 2003 Forest Resources
Technical Background Report
1.4.3 HUMBOLDT COUNTY TRENDS IN TIMBERLAND CONVERSION

When the Timber Production Zone potential was initially applied in Humboldt County in 1977, a total of 1,103,842 acres were identified as possible for TPZ zoning. During the TPZ zoning program, landowners had the opportunity to “contest” the zoning into TPZ by filing a written affidavit that a parcel had a “higher and better use” which was not included as a compatible use in the County’s TPZ Ordinance or that the parcel was not physically suited for timber production. In response to these affidavits, 42,053 acres were not zoned into TPZ. Additionally, as a consequence of Redwood National Park expansion in 1978, an additional 51,115 acres were considered but not zoned into TPZ. Subtracting the opt-out acreage leaves 1,061,789 acres in TPZ.

As of the year 2000-2001, total acreage of TPZ was 983,173 (see Table 2), indicating a loss of 78,616 acres since 1977. A significant change occurred with the expansion of Redwood National Park in 1978 which involved approximately 50,000 acres. As stated above, only approximately 1,000 acres of this has been as a consequence of direct rezones out of TPZ applied for and approved by the Planning Commission and Board of Supervisors. Approximately 910 acres of this were part of the County’s Eureka Community Plan in 1995.

Several other factors have played a role in direct conversion out of TPZ in Humboldt County: public acquisition by State or Federal agencies, land trusts established for conservation purposes, and private (non-profit interest group) acquisitions for purposes of donation to public entities for preservation. The latter category includes groups such as Save-the-Redwoods League, Ancient Forest International, and The Nature Conservancy. Most notable among recent federal acquisitions is that of the Headwaters Forest which resulted in a 7,472 acre preserve managed by the Bureau of Land Management. Additionally, there were additions to Grizzly Creek State Park amounting to 761 acres in 1999 and 691 acres in 2003. A recent U. S. General Accounting Office report entitled Federal Land Acquisitions in California Since January 1994 (GAO, 2000. GAO/RCED-00-239), identified acreage reportedly acquired by all Federal agencies during the previous seven year period. For Humboldt County the full ownership acreage reported during this seven year period was 5,210 acres. This figure does not include acreage that may have been acquired by third parties and donated to a federal agency or the more recent Headwaters Forest and Grizzly Creek transactions.

Other significant timberland conversions occurred as a consequence of the “Redwoods to Sea” and similar programs. In one transaction, this program of the Save-the-Redwoods League and Ancient Forest International resulted in the buyout of 3,800 acres of timberland from the Eel River Sawmills and transfer of ownership to the Bureau of Land Management. There are numerous other smaller purchases by these and other interest groups that have resulted in conversion and transfer to public entities. In 1998, the Save-the-Redwood League purchased a total of 690 acres, including the Hartsook Inn property in Garberville, and, in 2000, the League purchased over 4,785 acres of land statewide. The League’s Master Plan calls for numerous future additions to existing State and Federal redwood forest land holdings throughout Humboldt County though no specific acreages are identified. Efforts of Ancient Forest International are also ongoing for additional purchases, such as the 705 acre “Hole in the Headwaters.”

Continued timber land conversion from TPZ through acquisition by non-profit organizations and donation to public agencies is likely. Unlike direct purchase by State of Federal agencies, which include compensation such as the Headwaters Fund to offset impacts to local government, there is no compensation from these non-profit acquisitions. The acreage involved can be significant and a greater factor in timberland conversion than either direct subdivision or rezoning.
Certificates of Compliance/Determinations of Status. In addition to conventional methods of creating legal parcels (i.e., through subdivisions pursuant to the Subdivision Map Act), certificate of compliance/determination of status projects have sometimes been used to establish new parcels. A Certificate of Compliance is a legal document, which certifies that a parcel of land complies with the Subdivision Map Act. In other words, it is a document that states that a particular parcel of real property has been legally created.

There are a number of different ways to subdivide real property. The most common way is by tract map or parcel map. These processes are recognized by the State of California and by Humboldt County as being legal means of subdividing. However, many parcels were created long before these processes became widely accepted. Generally, if a parcel was created without using a process established by the Subdivision Map Act, yet was created prior to a specific date, then it is considered to be legally created.

The issuance of a Certificate of Compliance simply means that the parcel complies with the Subdivision Map Act. It does not mean that it complies with the Zoning Ordinance, Building Code, General Plan, or any other law or ordinance. Additionally, the issuance of a Certificate of Compliance does not necessarily mean that the lot has an approved means of access. Zoning, building codes, and access are not criteria used to determine the issuance of a Certificate of Compliance. It is feasible that a Certificate of Compliance can be issued for a parcel that is otherwise "unbuildable" or not suitable in terms of minimum size for the applicable zoning, such as TPZ.

Table 8 gives the acreage of TPZ zoned lands involved in Determinations of Status/Certificates of Compliance (DS/CC) for the seven year period 1995 to 2001. Not all of the acreage involved represents timberland or timberland conversions. Many of the large ranch parcels in the county have split zoning with a mix of Agriculture Exclusive and TPZ lands. As some of these ranches change hands, recognition of historic property boundaries occurs. In some cases, this may precede breakup of some large ranch holdings or it may be for purposes of establishing more logical management units. For example, the 1998 acreage includes a 934 acre estate of AE/TPZ land which applied to be broken up by a combination of DS/CC and Lot Line Adjustment to result in partially TPZ zoned parcels of 576 acres, 210 acres and 147 acres (this application was subsequently rescinded due to a agricultural preserve contract). In addition, some industrial timber land owners sometimes use the DS/CC and LLA processes to establish timber management units or for tax structuring.

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Acres</td>
<td>1,453</td>
<td>1,980</td>
<td>297</td>
<td>16 (934)</td>
<td>366</td>
<td>1,617</td>
<td>1,083</td>
</tr>
<tr>
<td>No. Parcels</td>
<td>11</td>
<td>24</td>
<td>11</td>
<td>5 (3)</td>
<td>20</td>
<td>57</td>
<td>28</td>
</tr>
</tbody>
</table>

*Includes parcels with split zoning of AE/TPZ and some pending applications.
As indicated by Table 8A, the number of applications received by the County for Determination of Status/Certificates of Compliance for TPZ lands has increased substantially for the four year period between 2001 to June, 2005. One quarter of all the Certificate of Compliance applications submitted from 1985 - 2000 was on agricultural properties and timberlands, affecting more than 18,000 acres. Between 2001 and 2005 over 67% of all Certificate of Compliance/ Determination of Status applications received by the County has been on agricultural and timberlands, affecting over 53,000 acres. Two large industrial timber companies, Eel River Sawmills and Barnum Timber have submitted applications for DS/CC on over 30,000 acres of TPZ land in the past 4 years.

<table>
<thead>
<tr>
<th>Year</th>
<th>01-02</th>
<th>02-03</th>
<th>03-04</th>
<th>04-05*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Acres</td>
<td>14,861</td>
<td>6,605</td>
<td>12,809</td>
<td>22,230</td>
</tr>
<tr>
<td>No. Parcels</td>
<td>61</td>
<td>27</td>
<td>152</td>
<td>167</td>
</tr>
</tbody>
</table>

*Through June, 2005

Lot Line Adjustments. A lot line adjustment is typically a minor movement of a property line(s) between two or more adjacent parcels. Lot line adjustments are used to correct minor trespasses or to add acreage to a parcel for the owners convenience. In addition, lot line adjustments have been used in combination with the DS/CC process to recognize and totally reconfigure a number of large acreage resource parcels. Lot line adjustments may affect TPZ zoned land in several ways. In some cases the adjustment may result in parcels smaller than 160 acres and require approval of a joint timber management plan. The Subdivision Map Act was revised in 2002 to require that LLA’s involving more than four parcels must now be processed as a subdivision. This has effectively reduced the number of reconfigurations of resource lands by LLA into residential subdivisions.

Table 9 gives the acreage of TPZ zoned lands involved in Lot Line Adjustments (LLAs) for the seven year period 1995 to 2001.

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Acres adjusted between parcels &lt; 160 acres</td>
<td>101</td>
<td>279</td>
<td>1,244</td>
<td>170</td>
<td>73</td>
<td>137</td>
<td>55</td>
</tr>
<tr>
<td>Acres adjusted from &gt; 160 to &lt;160 acre parcel size</td>
<td>0</td>
<td>0</td>
<td>189</td>
<td>337</td>
<td>257</td>
<td>80</td>
<td>0</td>
</tr>
<tr>
<td>Acres adjusted between parcels &gt; 160 acres</td>
<td>478</td>
<td>478</td>
<td>894</td>
<td>3,154</td>
<td>435</td>
<td>1,367</td>
<td>0</td>
</tr>
</tbody>
</table>
For the most part, lot line adjustments have either been minor adjustments between substandard sized parcels (less than 160 acres) or have been reconfiguration of larger resource parcels. In five cases during this seven year period parcels smaller than 160 acres were allowed by lot line adjustment with the preparation and approval of Joint Timber Management Plans. Since 2001, TPZ parcels as small as one and five acres have been approved with Joint Timber Management Plans by the Forestry Review Committee.

Subdivisions. Between 1995 and 2001 there have been only 5 subdivisions that have involved significant areas of TPZ lands. These include: 1) a lot split involving 20 acres of TPZ; 2) five one-acre RS lots split off from 30 acres of TPZ; 3) reconfiguration of AE/TPZ lands from 327 acres to 160 and 167 acres; 4) 14 acres of TPZ split into two lots; and 5) division of a 662 TPZ parcel into parcels of 160 and 402 acres. From 2001 to June, 2005 there have been 8 subdivision applications received that have involved TPZ lands. These included 1) 5 parcels on 42 acres of TPZ/AE; 2) 2 parcels on 77 acres of TPZ; 3) 3 parcels on 75 acres of TPZ/AE; 4) 3 parcels on 309 acres of TPZ/AE; 5) 2 parcels on 173 acres of TPZ; 6) 3 parcels on 118 acres of TPZ/AE; 7) 3 parcels on 25 acres on TPZ land; and 2 parcels on 128 acres on TPZ/AE.

TPZ Zone Reclassifications. There have not been many requests to rezone properties in the County out of Timber Production Zone. In the past seven years there has only been 9 direct rezones affecting TPZ lands, and of these, 7 were rezones from other zones into TPZ. The two rezones out of TPZ during this seven year period involved 10-year phase out of TPZ for a 30 acre parcel and a 20 acre parcel. As noted previously, direct land use conversions by rezone out of TPZ (Timber Production Zone) have been rather limited, on the order of 1,000 acres over the last 25 years, 910 acres of which were part of the County’s Eureka Community Plan in 1995.

Less than 3 Acre Conversion Exemptions. Finally, another process by which timberland conversion occurs is through the “Less than 3 acre Conversion Exemptions” which allow for the ministerial approval of conversion of less than 3 acres for other permitted land uses such as residential development.

Chapter 1 Endnotes

1.4 CONVERSION OF TIMBERLAND

Timberland conversion, the transfer of timberland to other uses, occurs as a result of General Plan amendments and new subdivisions, as well as through the Certificate of Compliance process, which involves recognition of historic parcels that may be substandard to minimum parcel sizes and densities established by the General Plan. One quarter of all the Certificate of Compliance applications submitted since 1985 have been on agricultural properties and timberlands, affecting more than 18,000 acres. Between 2001 and 2005 over 67% of all Certificate of Compliance/Determination of Status applications received by the County has been on agricultural and timberlands, affecting over 53,000 acres. Also, more than one half (53 percent) of all the lot line adjustment applications since 1985 have been on agricultural and timberlands, affecting more than 16,000 acres.

These changes are primarily reflective of the breakup of old family ranches. Timber production on these areas may still be viable; and it is unclear what specific effects this trend has had on the
timber economy. However, forest management practices are generally not enhanced with smaller parcel sizes. Land ownership patterns, for example, are likely to become more complicated with smaller parcel sizes, which may inhibit resource production. Direct land use conversions by rezone out of TPZ (Timber Production Zone) have been more limited, on the order of 1,000 acres over the last 25 years, 910 acres of which were part of the County's Eureka Community Plan in 1995.

An additional conversion issue that has long been a topic of debate is conversion by public acquisition, highlighted most recently by the Headwaters Forest Reserve acquisition, which removed 7,500 acres from timber production. While such conversions maintain the open space values of the lands, they are lost to the economic sector.

Finally, another process by which timberland conversion occurs is through the "Less than 3 acre Conversion Exemptions" which allow for the ministerial approval of conversion of less than 3 acres for other permitted land uses such as residential development.

1.4.1. NATIONAL TRENDS IN TIMBERLAND CONVERSION

Forest Ownnerships are Fragmenting. On a national and global scale there has been several recent trends that have impacted forestland ownership and could potentially be factors in timberland conversions in Humboldt County. On a national level it has been shown that forest ownerships are fragmenting. Statistics presented by Best and Wayburn (2001) demonstrate a continuing shift to smaller, more residential ownerships and the concurrent reduction in the mid-sized, mostly non-industrial ownerships. There are growing numbers of individual ownerships with an increasing number of parcels along the urban-rural interface and in the accessible rural areas, especially along rivers and lakes. Given these trends, it is likely that today more forestland is owned by individuals and families who are less interested in timber harvesting as an important revenue source than was the case in the past. In Humboldt County this trend is manifested in the breakup of family ranches and other large tracts under individual ownership. Often times the breakup may not be by direct subdivision, but could occur through the Determination of Status/Certificate of Compliance process where there are underlying patent parcels.

Individual Landowners are Aging. Another trend in forestland ownership is that individual landowners are aging. As of 1994, an estimated 2.5 million individual forest owners nationwide were 65 years or older and hold 23.5% of the total privately owned forests. An additional 2 million owners were estimated to be between 55 and 64. Many of these individual ownerships will go through some sort of intergenerational transfer in the next 20 years. Often times with such property transfers, tracts can be broken up and parcel sizes reduced. For some of these property transfers, unfunded estate taxes could force some degree of subdivision or unplanned timber harvest in the 1,000 acre plus size class. Additionally, owners in the 500 to 999 acre size class could be affected, depending on timber stocking and value. At current levels of estate tax, single owners of more than 500 acres begin to incur tax liability, exclusive of residential value or other assets and assuming no estate plan is in place. As can be seen in Tables 5 and 6, Humboldt County has numerous property owners in this category, thus representing a situation were further
estate breakup and parcel size reductions can be expected of the next 20 years for non-industrial private timberland property owners.

**Forest Industry is Restructuring.** Again, as reported by Best and Wayburn (2001) much of the 1990s can be characterized as a period during which the forest industry is restructuring. Industry was marginally covering its cost of capital and generating little if any free cash flow; and pulp prices were wildly volatile. The result has been an acceleration in industry consolidation and turnover in U.S. industrial forestland and processing facilities, in an effort to improve stakeholder returns and compete successfully in an increasingly globalized business sector. To compete with low cost producers in Asia and South America, U.S. companies have been upgrading the efficiencies of their processing facilities, and, in the course, many mills have been closed or changed ownership. This has been particularly apparent in Humboldt County, which has seen the closure or sale of numerous major forest product mill facilities: L-P lumber mills (Samoa and Big Lagoon), L-P Samoa Pulp Mill, Eel River Sawmills, Simpson Samoa Pulp Mill, Palco Mills A and B in Scotia, etc. Companies are also seeking out the highest-yielding soils and species worldwide to grow fiber as fast as possible.

Larger companies have taken the course of industrial consolidation to gain efficiencies and greater control over the resource and markets, and a wave of mergers has swept this sector in the last five years. To unlock the increased market value of their forests, many large industrial companies are divesting themselves of these lands or restructuring the ownership in such a way as to gain greater investor value. Virtually all major forest products companies have sold major tracts in recent years. Pulp and paper companies have been net sellers. The majority of lands have been acquired by other industrial timber owners, as well as institutional investors. For example, over three years Georgia-Pacific sold its timberlands completely, with its California holdings bought by a TIMO on behalf of a pension fund, while Louisiana-Pacific has sold all of its California holdings, with much of this property being acquired by Simpson Timber Company. It is unknown at this time what the long term effects of this widespread restructuring might be on timberland conversion. There is a potential that changing ownerships and decreased interest in maintaining less productive soils and species could ultimately result in some conversions.

**Financial Ownership of Forestland Is on the Rise.** Another trend in forest ownership apparent in the 1990s is that financial ownership of forestland is on the rise. Forestland is evolving into a financial asset, owned for its value as a portion of a diversified investment portfolio. This type of ownership is increasing as investors seek greater tax efficiency and liquidity of their holdings. Another reason behind this trend is due to investment by pension funds, which are tax-exempt investors. Pension funds are the largest financial owners of forest lands in the United States. With the growing investment by pension funds, it is likely that financial ownership of private forests in the U.S. will accelerate. Many of the forest lands from which industrial corporations have divested themselves have gone into financial ownerships. There is no guarantee that the demands of the capital markets for return form these forests will be any different than the demands experience by the forest industry. Hence, these owners would have similar management perspectives to other large forest owners such as forest products companies. In reviewing the 40 largest landowners in Humboldt County, it is evident that the largest forest land ownerships remain in the hands of industrial timber operators, Tribes, family ranches or individual ownerships.
1.4.2. STATE TRENDS IN TIMBERLAND CONVERSION

A recent study of Timberland Conversions in California from 1969 to 1998 was completed by Tian-Ting Shih (2002) of the California Department of Forestry (Technical Working Paper 1-01-02). Based on a 1994 U.S. Forest Service Inventory and Analysis estimate, approximately 7.4 million acres of timberland statewide are in private ownership and about 5.5 million acres of that total is zoned for timber production (TPZ). The remaining 2.9 million acres are not zoned TPZ but are treated as Timberland for purposes of forest practice regulation requiring conversion permits. Figure 8 shows the approximate location of private timberlands and TPZ lands in Humboldt County.

Under CDF’s regulations, “conversion” from timber growing to other land uses may occur on land that is zoned for timber production or land that is still timberland but which is not zoned for timber production. Within non-TPZ timberlands, under Section 1100(g) of the California Code of Regulations (CCR), timberland conversion means transforming timberland to a non-timber growing use through timber operations where: future timber harvesting will be prevented; stocking requirements will not be met within five years; or there is a clear intent to divide timberland into ownerships of less than three acres (requires a timberland conversion permit).

Shih’s analysis divides the state into three regions, with Humboldt County in the Coast region consisting of the Northern and central coast counties of Alameda, Colusa, Contra Costa, Del Norte, Humboldt, Lake, Marin, Mendocino, Napa, San Francisco, San Mateo, Santa Clara, Santa Cruz, Solano, Sonoma, Yolo, and western Trinity County. Over the past 30 years (1969-1998), 45,345 acres or 40 percent of timberlands converted in California were in the Coast region with an average of 259 acres per conversion. More recently (last two decades) the average acreage of timberland conversion permits issued was around 50 acres each year for the Coast region. During the first decade (1968-1977) 96 percent of the conversions were for grazing lands. More recently, conversions for subdivision development shifted from four percent during the first decade to 24 percent for the last decade. By acreage, more than half of timberland conversion statewide was used for subdivision development during the last two decades.

Another large factor in conversion of timberland in the region has been for the purpose of conversion to vineyards. Between 1991 and 1998, a total of 1,186 acres were converted to vineyards, with the bulk of these conversions in Mendocino (32%), Sonoma (30%) and Napa (17%) counties. Timberland conversion to vineyards in Humboldt County, however, has been minimal so far, as most vineyard development here has been on non-timbered lands and there are fewer locations (notably Willow Creek, Briceland, and Myers Flat) in the county suitable for commercial production.

Statewide, from 1979 to 1998 only 36 out of 344 timberland conversions (direct rezone out of TPZ) were conducted on TPZ zoned land, and accounted for only 20 percent of the total timberland conversion acreage. Within these rezoning acreages, 7 percent were converted for subdivision development, 8 percent for recreation, and the remaining 85 percent for other land uses. This is in contrast to the picture for Humboldt County, where direct land use conversions by rezone out of TPZ have been more limited, on the order of 1,000 acres over the last 25 years, 910 acres of which were part of the County’s Eureka Community Plan in 1995 to provide for more residential development.
Since most timberland conversions are conducted on non-industrial private land, timberland converted at historic rates has not significantly impacted California's timber supply, but has caused concerns when timberland conversions occurred around urban areas for subdivision and vineyard development. As reported by Shih, with California's large population and economic growth and public policies on land use unchanged, the overall trend is expected to rise for the next decade.

1.4.3 HUMBOLDT COUNTY TRENDS IN TIMBERLAND CONVERSION

When the Timber Production Zone potential was initially applied in Humboldt County in 1977, a total of 1,103,842 acres were identified as possible for TPZ zoning. During the TPZ zoning program, landowners had the opportunity to "contest" the zoning into TPZ by filing a written affidavit that a parcel had a "higher and better use" which was not included as a compatible use in the County's TPZ Ordinance or that the parcel was not physically suited for timber production. In response to these affidavits, 42,053 acres were not zoned into TPZ. Additionally, as a consequence of Redwood National Park expansion in 1978, an additional 51,115 acres were considered but not zoned into TPZ. Subtracting the opt-out acreage leaves 1,061,789 acres in TPZ.

As of the year 2000-2001, total acreage of TPZ was 983,173 (see Table 2), indicating a loss of 78,616 acres since 1977. A significant change occurred with the expansion of Redwood National Park in 1978 which involved approximately 50,000 acres. As stated above, only approximately 1,000 acres of this has been as a consequence of direct rezones out of TPZ applied for and approved by the Planning Commission and Board of Supervisors. Approximately 910 acres of this were part of the County's Eureka Community Plan in 1995.

Several other factors have played a role in direct conversion out of TPZ in Humboldt County: public acquisition by State or Federal agencies, land trusts established for conservation purposes, and private (non-profit interest group) acquisitions for purposes of donation to public entities for preservation. The latter category includes groups such as Save-the-Redwoods League, Ancient Forest International, and The Nature Conservancy. Most notable among recent federal acquisitions is that of the Headwaters Forest which resulted in a 7,472 acre preserve managed by the Bureau of Land Management. Additionally, there were additions to Grizzly Creek State Park amounting to 761 acres in 1999 and 691 acres in 2003. A recent U. S. General Accounting Office report entitled Federal Land Acquisitions in California Since January 1994 (GAO. 2000. GAO/RCED-00-239), identified acreage reportedly acquired by all Federal agencies during the previous seven year period. For Humboldt County the full ownership acreage reported during this seven year period was 5,210 acres. This figure does not include acreage that may have been acquired by third parties and donated to a federal agency or the more recent Headwaters Forest and Grizzly Creek transactions.

Other significant timberland conversions occurred as a consequence of the "Redwoods to Sea" and similar programs. In one transaction, this program of the Save-the-Redwoods League and Ancient Forest International resulted in the buyout of 3,800 acres of timberland from the Eel River Sawmills and transfer of ownership to the Bureau of Land Management. There are numerous other smaller purchases by these and other interest groups that have resulted in conversion and transfer to public entities. In 1998, the Save-the-Redwood League purchased a total of 690 acres, including the Hartsock Inn property in Garberville, and, in 2000, the League purchased over 4,785 acres of land statewide. The League's Master Plan calls for numerous future additions to existing State and
Federal redwood forest land holdings throughout Humboldt County though no specific acreages are identified. Efforts of Ancient Forest International are also ongoing for additional purchases, such as the 705 acre “Hole in the Headwaters.”

Continued timber land conversion from TPZ through acquisition by non-profit organizations and donation to public agencies is likely. Unlike direct purchase by State of Federal agencies, which include compensation such as the Headwaters Fund to offset impacts to local government, there is no compensation from these non-profit acquisitions. The acreage involved can be significant and a greater factor in timberland conversion than either direct subdivision or rezoning.

Certificates of Compliance/Determinations of Status. In addition to conventional methods of creating legal parcels (i.e., through subdivisions pursuant to the Subdivision Map Act), certificate of compliance/determination of status projects have sometimes been used to establish new parcels. A Certificate of Compliance is a legal document, which certifies that a parcel of land complies with the Subdivision Map Act. In other words, it is a document that states that a particular parcel of real property has been legally created.

There are a number of different ways to subdivide real property. The most common way is by tract map or parcel map. These processes are recognized by the State of California and by Humboldt County as being legal means of subdividing. However, many parcels were created long before these processes became widely accepted. Generally, if a parcel was created without using a process established by the Subdivision Map Act, yet was created prior to a specific date, then it is considered to be legally created.

The issuance of a Certificate of Compliance simply means that the parcel complies with the Subdivision Map Act. It does not mean that it complies with the Zoning Ordinance, Building Code, General Plan, or any other law or ordinance. Additionally, the issuance of a Certificate of Compliance does not necessarily mean that the lot has an approved means of access. Zoning, building codes, and access are not criteria used to determine the issuance of a Certificate of Compliance. It is feasible that a Certificate of Compliance can be issued for a parcel that is otherwise "unbuildable" or not suitable in terms of minimum size for the applicable zoning, such as TPZ.

Table 8 gives the acreage of TPZ zoned lands involved in Determinations of Status/Certificates of Compliance (DS/CC) for the seven year period 1995 to 2001. Not all of the acreage involved represents timberland or timberland conversions. Many of the large ranch parcels in the county have split zoning with a mix of Agriculture Exclusive and TPZ lands. As some of these ranches change hands, recognition of historic property boundaries occurs. In some cases, this may precede breakup of some large ranch holdings or it may be for purposes of establishing more logical management units. For example, the 1998 acreage includes a 934 acre estate of AE/TPZ land which applied to be broken up by a combination of DS/CC and Lot Line Adjustment to result in partially TPZ zoned parcels of 576 acres, 210 acres and 147 acres (this application was subsequently rescinded due to a agricultural preserve contract). In addition, some industrial timberland owners sometimes use the DS/CC and LLA processes to establish timber management units or for tax structuring.

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Acres</td>
<td>1,453</td>
<td>1,980</td>
<td>297</td>
<td>16 (934)</td>
<td>366</td>
<td>1,617</td>
<td>1,083</td>
</tr>
<tr>
<td>No. Parcels</td>
<td>11</td>
<td>24</td>
<td>11</td>
<td>5 (3)</td>
<td>20</td>
<td>57</td>
<td>28</td>
</tr>
</tbody>
</table>

*Includes parcels with split zoning of AE/TPZ and some pending applications.

As indicated by Table 8A, the number of applications received by the County for Determination of Status/Certificates of Compliance for TPZ lands has increased substantially for the four year period between 2001 to June, 2005. One quarter of all the Certificate of Compliance applications submitted from 1985 - 2000 was on agricultural properties and timberlands, affecting more than 18,000 acres. Between 2001 and 2005 over 67% of all Certificate of Compliance/ Determination of Status applications received by the County has been on agricultural and timberlands, affecting over 53,000 acres. Two large industrial timber companies, Eel River Sawmills and Barnum Timber have submitted applications for DS/CC on over 30,000 acres of TPZ land in the past 4 years.

Table 8a. Determinations of Status/Certificates of Compliance for TPZ & TPZ/AE* zoned lands between 2001 through June 2005.

<table>
<thead>
<tr>
<th>Year</th>
<th>01-02</th>
<th>02-03</th>
<th>03-04</th>
<th>04-05*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Acres</td>
<td>14,861</td>
<td>6,605</td>
<td>12,809</td>
<td>22,230</td>
</tr>
<tr>
<td>No. Parcels</td>
<td>61</td>
<td>27</td>
<td>152</td>
<td>167</td>
</tr>
</tbody>
</table>

*Through June, 2005

Lot Line Adjustments. A lot line adjustment is typically a minor movement of a property line(s) between two or more adjacent parcels. Lot line adjustments are used to correct minor trespasses or to add acreage to a parcel for the owners convenience. In addition, lot line adjustments have been used in combination with the DS/CC process to recognize and totally reconfigure a number of large acreage resource parcels. Lot line adjustments may affect TPZ zoned land in several ways. In some cases the adjustment may result in parcels smaller than 160 acres and require approval of a joint timber management plan. The Subdivision Map Act was revised in 2002 to require that LLA's involving more than four parcels must now be processed as a subdivision. This has effectively reduced the number of reconfigurations of resource lands by LLA into residential subdivisions.

Table 9 gives the acreage of TPZ zoned lands involved in Lot Line Adjustments (LLAs) for the seven year period 1995 to 2001.

Table 9. Lot Line Adjustments of TPZ zoned lands or partially TPZ zoned lands.

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Acres adjusted between parcels &lt; 160 acres</td>
<td>101</td>
<td>279</td>
<td>1,244</td>
<td>170</td>
<td>73</td>
<td>137</td>
<td>55</td>
</tr>
<tr>
<td>Acres adjusted from &gt; 160 to &lt;160 acre parcel size</td>
<td>0</td>
<td>0</td>
<td>189</td>
<td>337</td>
<td>257</td>
<td>80</td>
<td>0</td>
</tr>
<tr>
<td>--------------------------------------------------</td>
<td>---</td>
<td>---</td>
<td>-----</td>
<td>-----</td>
<td>-----</td>
<td>----</td>
<td>---</td>
</tr>
<tr>
<td>Acres adjusted between parcels &gt; 160 acres</td>
<td>478</td>
<td>478</td>
<td>894</td>
<td>3,154</td>
<td>435</td>
<td>1,367</td>
<td>0</td>
</tr>
</tbody>
</table>

For the most part, lot line adjustments have either been minor adjustments between substandard sized parcels (less than 160 acres) or have been reconfiguration of larger resource parcels. In five cases during this seven year period parcels smaller than 160 acres were allowed by lot line adjustment with the preparation and approval of Joint Timber Management Plans. Since 2001, TPZ parcels as small as one and five acres have been approved with Joint Timber Management Plans by the Forestry Review Committee.

Subdivisions. Between 1995 and 2001 there have been only 5 subdivisions that have involved significant areas of TPZ lands. These include: 1) a lot split involving 20 acres of TPZ; 2) five one-acre RS lots split off from 30 acres of TPZ; 3) reconfiguration of AE/TPZ lands from 327 acres to 160 and 167 acres; 4) 14 acres of TPZ split into two lots; and 5) division of a 662 TPZ parcel into parcels of 160 and 402 acres. From 2001 to June, 2005 there have been 8 subdivision applications received that have involved TPZ lands. These included 1) 5 parcels on 42 acres of TPZ/AE; 2) 2 parcels on 77 acres of TPZ; 3) 3 parcels on 75 acres of TPZ/AE; 4) 3 parcels on 309 acres of TPZ/AE; 5) 2 parcels on 173 acres of TPZ; 6) 3 parcels on 118 acres of TPZ/AE; 7) 3 parcels on 25 acres on TPZ land; and 2 parcels on 128 acres on TPZ/AE.

TPZ Zone Reclassifications. There has not been a lot of requests processed to rezone properties in the County out of Timber Production Zone. In the past seven years there has only been 9 direct rezones affecting TPZ lands, and of these, 7 were rezones from other zones into TPZ. The two rezones out of TPZ during this seven year period involved 10-year phase out of TPZ for a 30 acre parcel and a 20 acre parcel. As noted previously, direct land use conversions by rezone out of TPZ (Timber Production Zone) have been rather limited, on the order of 1,000 acres over the last 25 years, 910 acres of which were part of the County’s Eureka Community Plan in 1995.

Less than 3 Acre Conversion Exemptions. Finally, another process by which timberland conversion occurs is through the “Less than 3 acre Conversion Exemptions” which allow for the ministerial approval of conversion of less than 3 acres for other permitted land uses such as residential development.

Chapter 1 Endnotes
Attachment E:

Written comments submitted by Farm Bureau
On July 3, 2007
Martha Spencer, Senior Planner
Community Development Services
County of Humboldt
3015 H Street
Eureka, CA 95503

Dear Ms. Spencer:

The Humboldt County Farm Bureau has reviewed the Natural Resource / Agricultural Section of the General Plan and we have the following general comments:

**Land Use-Natural Resources** - *'No Net Loss' of privately owned lands through purchase by Federal or State Government.*
Resolution 92-35 adopted by the Board of Supervisors in part provides:

> ‘...the Humboldt County Board of Supervisors goes on record as supporting the concept of “no net loss of privately owned lands” coupled with the concept that the acquisition of any lands by State and Federal Government shall be offset by lands of equal dollar value sold back to the private sector by the government with “no net loss of revenue” to the government to be created by the transactions.’

This or a similar policy needs to be incorporated into the Natural Resources Section of the General Plan.

**Entitlements**: There is a need to adequately define or describe what the term ‘entitlement’ means. We keep hearing about the 17-20,000 ‘entitlements’
located within the Rural Areas of the County. As a result of this perception of entitlement, various additional restrictions or programs meant to reduce or eliminate the impacts associated with the exercise of these impacts are being considered or proposed. We would like to know upon what bases the County is making the determination of the number of entitlements being stated.

If the total number of entitlements is based upon the number of potentially certifiable ‘patent parcels’ under the Subdivision Map Act, then this should be stated. If the number is based on some projection of a level of development that could potentially be subdivided under the zoning (with or without regard to constraints) then this should be stated.

It is our understanding that a Certificate of Subdivision Compliance, processed under the Subdivision Map Act, specifically provides that the development (structures, roads, etc.) is not automatically authorized with the issuance of the Certificate. The sale, lease or financing of the certified parcel is authorized (assuming the Certificate is not conditional).

Since the patent parcels were originally issued prior to the time of regulation by the state or local government, we do not see how the County can now administratively make the determination that the parcel was created in conformance with the then existing laws (there were none).

**Flood:** We would like to suggest that the FEMA Survey regarding high water determination which identifies the location of the flood areas should be reviewed by the county to verify it’s accuracy. This mapping project should be coordinated by the county and a final product of corrected maps be developed as needed.

**Alternative D- Humboldt County General Plan Volume I Framework Plan:**

It is noted that a couple of the most substantial implementation measures found within Chapter 5-Implementation of the Framework Plan (adopted December 1984) were programs to: amend the zoning and subdivision ordinances of the County to make consistent with and implement the Framework Plan Policies (especially as they relate to the lands outside of the Community Planning Areas); the application of the new ordinances (including zone map changes) to the rural areas of the County; and the completion of the update of the balance of the Community Plans.
To date, the three implementation measures have not been accomplished. It is not known/knowable as to what would have happened to the rural lands over the hiatus of 23 years.

There is a need to compare the alternatives that are being proposed to the adopted Plan and its goals, policies, and standards. In this way the present language may be viewed in the context of the proposed changes. The format is use during the current process does not readily lend itself to this comparison (in fact it is very confusing or unnecessary difficult to review).

In closing, the Farm Bureau would like to request that the County cross reference the chapters to clarify the effects each proposed option would incur. Furthermore, we suggest the county continue to develop a complete General Plan Draft to enable us to review the document in its entirety. This way we can determine how specific rules in one section will effect the other sections. And finally, we would like to request a complete list of definitions to allow us to understand the intent of the document.

Thank you for allowing the Farm Bureau to provide comments and we look forward to working with you on this project in the future.

Sincerely,

Jim Regli
President
Attachment F:

"No Net Loss" Resolution, No. 92-35
RESOLUTION NO. 92-35

RESOLUTION REGARDING "NO NET LOSS"
OF PRIVATELY OWNED LANDS THROUGH
PURCHASE BY FEDERAL OR STATE GOVERNMENT

WHEREAS, the membership of the Humboldt-Del Norte Cattlemen's Association is drawn from men and women dependent upon and committed to the wise stewardship of natural resources; and

WHEREAS, the economy and the way of life of our Community, State and Nation is dependent upon private sector ownership and management of these natural resources; and

WHEREAS, environmental concerns continue to generate increasing pressure on Government to purchase and remove productive lands from production; and

WHEREAS, it is becoming apparent that a policy for setting priorities is critical to minimize fiscal pressures at all levels of government created by these acquisitions;

NOW, THEREFORE, BE IT RESOLVED that the Humboldt County Board of Supervisors goes on record as supporting the concept of "no net loss of privately owned lands" coupled with the concept that the acquisition of any lands by State and Federal Government shall be offset by lands of equal dollar value sold back to the private sector by the government with "no net loss of revenue" to the government to be created by the transactions.

BE IT FURTHER RESOLVED that copies of this resolution be sent to the California Cattlemen's Association, appropriate producer organizations, elected officials and the news media.

(E-3)
Adopted on motion by Supervisor Neely, second by Supervisor Sparks, and the following vote:

AYES: Supervisors Dixon, Pritchard, Neely, and Sparks
NAYS: Supervisor Fulkerson
ABSENT: None
ABSTAIN: None

STATE OF CALIFORNIA )
County of Humboldt ) ss

I, J. BRUCE RUPP, Clerk of the Board of Supervisors, County of Humboldt, State of California, do hereby certify the foregoing to be a full, true, and correct copy of the original made in the above-entitled matter by said Board of Supervisors at a meeting held in Eureka, California as the same now appears of record in my Office.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the Seal of said Board of Supervisors.

J. BRUCE RUPP

Clerk of the Board of Supervisors of the County of Humboldt, State of California.

By Lora Frediani, Deputy
March 25, 1992

(E-3)