

Supervisor Estelle Fennel, Chairperson
Humboldt County Board of Supervisors
825 5th Street, Room 111
Eureka, CA 95501

March 23, 2015

RE: Comments on Appendix B Glossary and Definitions of the Humboldt County General Plan Update

Dear Chairperson Fennel and Supervisors,

Thank you for the opportunity to participate in the Humboldt County General Plan Update process. With this letter we are submitting written comments on Appendix B Glossary and Definitions of the draft General Plan Update.

Comments provided by Green Diamond Resource Company (Green Diamond) on Appendix B are specific to those terms and definitions associated with forestry and natural resource management. Many of these terms are used and defined in the California Forest Practice Rules and Act. If it is the intent of the Board of Supervisors that these terms and definitions are to be consistent with the California Forest Practice Rules and Act, Green Diamond would recommend that the Board of Supervisors request the Forest Review Committee (FRC) review the terms and definitions to ensure consistency with the Forest Practice Rules and Act. The following is a list of defined terms included in Appendix B which should be considered for further review by the FRC:

California Department of Forestry and Fire Protection (CAL FIRE): An agency of the State of California responsible for the administration of state regulations of the growing and harvesting of timber and the ~~provision of fire protection services to rural areas outside of established fire districts~~ and the agency with financial responsibility for preventing and suppressing wildfires within State Responsibility Area (SRA), as defined by Public Resources Code Section 4125-4137.

California Forest Practices Act: That portion of California state law (~~PRC §~~ Public Resources Code Section 4511 ~~et seq.~~ and following) which establishes regulations for the growth, harvesting, management, and restocking of timberlands.

Ecosystem Services are the contributions that a biological community and its habitat provide to our day-to-day lives (National Oceanic and Atmospheric Administration). Examples of ecosystem services include basic services - provisioning services like the delivery of food, fresh water, wood and fiber, and medicine - and services that are less tangible and harder to measure but equally critical: regulating services like carbon sequestration, erosion control, and pollination; cultural services like recreation, ecotourism, and educational and spiritual values; and supporting services like nutrient cycling, soil formation, and primary productivity (United States Department of Agriculture).

Forestland: Resource land which is currently producing (or, in some cases, capable of producing) a forest.

Forest Practices Act: See "California Forest Practices Act"

Improvement in Forest Health and Productivity. Significant improvement can be addressed with reasonable and feasible measures as described in the subdivision application. Examples of typical forest management measures that will be applicable to this definition are:

- Silvicultural practices that are used to increase conifer stocking, species distribution tree growth, and reduce the spread of forest pests and disease.
- Measures applied to roads to reduce sediment inputs.
- Stream or upland, fisheries or wildlife enhancement projects.
- Activities related to improved access for fire suppression.
- Activities related to fire prevention and reduction of the spread of wildfire.
- Protection of archeological and historic features.
- Continued maintenance of past projects that support the above list.

Joint Timber Management Plan: Provides for the management and harvesting of timber by the original and any subsequent owners, and recorded as a deed restriction on all newly created parcels smaller than 160 acres in the Timberland Production Zone.

Resource Lands: Properties primarily used for natural resource production which also provide ecological services. Examples include, but are not limited to, timberland and farmland.

Special Treatment Area Standards: Those criteria and requirements found in Title 14, Chapter 4 of the California Code of Regulations.

Timber Harvest: The cutting and removal of timber or other solid wood forest products from timberlands for commercial purposes, together with all of the work incidental to the harvest including, but not limited to: construction and maintenance of roads, fuel breaks, fire breaks, stream crossings, landings, skid trails, beds for the falling of trees, and fire hazard abatement.

Timberland: Privately owned land, or land acquired for state forest purposes, which is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, and which is capable of growing and average annual volume of wood fiber of at least 15 cubic feet per acre (per 51104(f) of the California Timberland Productivity Act of 1982).

Timberland Conversion Permit: A permit issued by the California Department of Forestry and Fire Protection to authorize the conversion of an area presently recognized as timberland to non-timberland uses. Timberland Conversion Permits are routinely sought for land clearance and grading associated with building sites, the development of access and utility facilities, or to establish fields for cultivation.

Timber Management: The cutting and/or removal of timber, other solid forest wood products, or other vegetation from timberlands for the purpose of improving the productivity of commercial species on the site together with all of the work incidental to this activity, such as construction and maintenance of roads, fuel breaks, fire breaks, stream crossings, and fire hazard abatement. Timber management activities include, but are not limited to: pre-commercial thinning, removal of non-preferred species (release), pruning, site preparation, protection practices, and incidental follow-up treatments. Pruning, protection practices (including such activities as placement of protective devices around trees and trapping), and incidental follow up treatments do not constitute development as defined by the 1976 Coastal Act. (See definition of "Development").

Timber Products Processing: Commercial processing of raw wood and wood products, including sawmills, lumber mills and plywood mills, but not including pulp mills.

Timber Site Classes: In California, a classification system of timberland valuation and tree-growing potential describing five general site classes (I – V) within three general forest types: redwoods, whitewoods (Douglas fir), and ponderosa pine. Site I denotes areas having the highest timber productivity while Site V denotes areas as having the lowest timber productivity.

Timber Site III (Good): "Good" Site III land is Timber Site Class III (either redwood or whitewood) land that has not been physically damaged to a point where it is unlikely that a commercial crop of timber can reasonably be expected to be grown on the area. Site III refers to areas designated by California Department of Forestry Soil Vegetation Maps.

Timber Production Zone (TPZ): As established under the Timberlands Preservation Act (~~CGC~~ California Government Code Section 51113), a zoning district to designate and set standards in areas so designated for the growth, harvesting, and production of timber, timber products, and other compatible uses.

Thank you for your consideration of our comments.

Sincerely,



Craig A. Compton
Manager, Land Management and Business Development

CC: Board of Supervisors: Rex Bohn, Mark Lovelace, Virginia Bass, Ryan Sundberg
Planning Department: Kevin Hamblin, Rob Wall, Michael Richardson