



May 16, 2014

Humboldt County Board of Supervisors
825 Fifth Street, Room 111
Eureka, CA 95501

Re: Open Space Chapter of the Conservation and Open Space Element of the County's General Plan Update

Dear Supervisors,

On behalf of the board, staff, and members of the Northcoast Environmental Center and Humboldt Baykeeper, we submit these comments on the Open Space chapter of the Conservation & Open Space Element of the County's General Plan Update (GPU).

Maintaining Humboldt County's open space is very important to our organizations for a variety of reasons. Clean air, clean water, scenic beauty, recreation, enjoyment of the natural world, nature study, and wildlife habitat are some of the open space values that contribute to the quality of life of Humboldt County residents while attracting visitors to the area.

Trails, including completion of the Coastal Trail in particular, are a high priority for a broad cross-section of Humboldt County residents. Trail access provides opportunities for recreational hiking and biking; promotes public health and safety in rural and urban/suburban communities; and provides safe and practical transportation routes that will help the County meet its greenhouse gas reduction goals by reducing dependency on automobiles for transportation.

CO-G4 Parks and Recreation

We strongly support reinstating the language that was removed by the current Planning Commission: "and a Countywide Trail System that meets future recreational and non-motorized transportation demands."

As you know, the goal of a Countywide Trail System is extremely important to many of your constituents, but it is also important for securing state and federal grant funding that is critical for trail planning and construction. In addition, PRC §5076 states:

“In developing the open-space element of a general plan as specified in subdivision (e) of Section 65302 of the Government Code, every city and county shall consider demands for trail-oriented recreational use and shall consider such demands in developing specific open-space programs. Further, every city, county, and district shall consider the feasibility of integrating its trail routes with appropriate segments of the state system.”

Trails for transportation purposes may be addressed in the Circulation Element but removing this goal from the Open Space Element is insufficient for the above reasons. We believe that the County General Plan should be clear that trails are a priority for our region.

CO-P1xx Open Space Acquisition/Community Forests

We support reinstating the original language. We disagree with the Planning Commission’s recommendation to replace “shall seek” with “may consider” opportunities to acquire high-value open space lands, including community forests, and open space conservation easement. As with the Countywide Trail System, the original language more appropriately reflects strong support within the community for such acquisition, and will assist in obtaining critical grant funding necessary for such acquisition. We support the addition of the phrase, “from willing sellers,” but the phrase “at market price” should be stricken, since the possibility of donations and bequests should be allowed if such opportunities should arise.

CO-P4 Greenbelts

We continue to support the inclusion of greenbelt overlay zones, without which this policy is unlikely to be implemented. Greenbelts between existing communities (e.g., McKinleyville/Fieldbrook and Bayside/Indianola) will ensure that the forests and farms adjacent to our communities will continue to provide open space values that make Humboldt County such a desirable place to live.

Reinstate Stronger Language Removed by the Planning Commission

The Planning Commission’s recent review of this section of the County GPU involved replacing “shall” with “should” or “may,” with the overall effect of watering down many goals and policies. Specifically, we urge you to reinstate the 2012 Planning Commission versions of the following:

- **CO-G3 Conservation and Open Space Program:** Reinstate “implement” rather than “encourage.”
- **CO-G5 Open Space and Residential Development:** Reinstate “minimizes exposure to public safety hazards, and minimizes the cost of providing public services” and remove “while allowing compatible uses.”

CO-Px1 Transfer of Development Rights Program

We support the recently recommended changes to the 2012 version of this policy since it further clarifies the original intent to research and develop a program to transfer development rights as a means of protecting resource lands and open space.

We appreciate the opportunity to comment on the important decisions before you.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Dan Ehresman', with a long horizontal flourish extending to the right.

Dan Ehresman, Executive Director
Northcoast Environmental Center

A handwritten signature in black ink, appearing to read 'Jennifer Kalt', written in a cursive style.

Jennifer Kalt, Director
Humboldt Baykeeper