

Added PC

Hand out

Northern California Association of Home Builders

July 14, 2014

Rex Bohn, Chairperson, and
Humboldt County Board of Supervisors
825 Fifth Street
Eureka, California 95501

Subject: Mineral Resources Element of the GPU

Dear Chair Bohn and Members of the Board,

The NCHB does not support any additional regulations on the Mineral Resource industry in Humboldt County, and therefore supports the comments submitted on behalf of Mercer Fraser Company, Eureka ready Mix and other industry representatives. We respectfully request you implement their suggested revisions and requested modifications to the Mineral Resources section of the General Plan Update.

The NCHB is concerned that the proposed policy language that dictates extraction and exporting quantities of sand, gravel and rock in and from Humboldt County will directly dictate the affordability of housing, commercial and other construction in Humboldt County, both private and public. Sand, gravel and rock are base materials for road grading, fill and concrete used in construction, both private and public. Any regulations put on this industry other than those that are already in effect through the State and Federal regulations, (SMARA and the SMARA Guidelines) would be duplicative and potentially crippling to this County's economic viability. For example:

- Rock quarry owners, usually ranchers and timber land owners, regularly have to rely on using the proceeds from their rock quarries to supplement their incomes.
- The construction industry suffers higher prices due to lower product availability, thereby directly affecting housing affordability.
- The County Public Works Department relies on immediate access from quarry owners to aggregate when it needs sand, gravel and rock for road and highway repairs, slide repairs and slope stabilization. It too, would suffer higher costs due to lower availability.
- The County Economic Development Department is in support of renovating the local railroads to have future product transport potential for all goods leaving and entering the County. Adding regulatory costs would affect the availability of gravel, rock and sand, and would threaten the likelihood of railroad track beds, tunnels etc. ever being constructed or repaired in this County.

Humboldt County should stay out of the mining business. Relevant mining issues are currently governed by other State agencies and all extraction project applications go through a rigorous review for transportation, cultural resources, reclamation, water quality, and other environmental issues and must comport with CEQA and SMARA and the SMARA guidelines. Leave the current policies in place; do not add more burdens to the mining community.

Aggregates are literally the building blocks of the construction industry. Adding costs and duplicating regulations ultimately raises the cost of every commercial, residential, and public

project built. Some of the proposed policies may have severe, negative long-term economic impacts on the mining community including the County Public Works Roads Division, other Counties with in the transport vicinity, and the construction industry at large. The NCHB does not support any additional regulations on the Mineral Resource industry in Humboldt County, and therefore supports the comments submitted on behalf of Mercer Fraser Company, Eureka ready Mix and other industry representatives. We respectfully request you implement their suggested revisions and requested modifications to the Mineral Resources section of the General Plan Update. Thank you for your consideration.

For the NCHB,

Julie Williams

Advocate

Addition PC
Handed at
meeting

General Plan Hearing, July 14, 2014
Chapter 10.3 Biological Resources

I am speaking in support of the current language in this chapter pertaining to invasive plant species and their control, specifically BR-P9 and BR-S13.

Policy BR-9 and Standard BR-S13 are consistent with Goals and Policies of this chapter related to **Threatened and Endangered Species, Sensitive and Critical Habitat, and Benefits to Biological Resources** those fish and wildlife habitats protected to generate public, economic and environmental benefits.

Invasives are an issue of landscape degradation for all undeveloped zones in this plan and across multiple land uses; timberlands and such invasive species as pampas grass and scotch broom can dominate post-harvest settings and exclude tree seedling growth; agricultural lands and yellow starthistle, tansy ragwort or spotted knapweed can dominate the fields and take up all the water to the exclusion of anything else; salt marshes of Humboldt Bay and the invasive spartina which displaces the native marsh species integral to the aquatic life of the bay; riverine and riparian systems and japanese knotwood or purple loosestrife halting channel processes of scour and deposition, both inherent to these systems... **In all of these zones invasives species are a threat to the value of the land whether it be for agriculture purposes or riparian function. Policies which support control are integral to biological resources integrity—the focus of this chapter.**

Specifically on the relationship of invasive plant species language in the plan to the goals and policies for Threatened and Endangered Species And Sensitive and Critical Habitat...

Of the California coastline, roughly 20% supports coastal dunes. Of those most have been degraded by invasive plant species. Due to a long history of restoration dating back to the 1970s the North Spit of Humboldt Bay has within its span the most intact and rare coastal dune system on the west coast associated with the Lanphere Unit of the Humboldt Bay Wildlife Refuge. Years of removing invasive plant species on other parts of the spit by BLM, Friends of the Dunes and Manila Community Services District are making a difference, providing connectivity of native plant communities and habitats across multiple land ownerships. Components of intact and restored coastal dune systems include:

- geomorphic processes that are alive and well, allowing for the development of a series of dunes, dune ridges and swales (freshwater wetlands)
- dunes, dune ridges and swales support an array of plant communities- Northern Foredune Grassland, closest community to the ocean, which is ranked by the State as the rarest of communities- global (G1) = **critically imperiled** and Northern Foredune/Dune Mat community ranked G3/S3, = a setting that is **vulnerable**.
- instead of one or two dominating invasive plant species,—european beachgrass and yellow bush lupine—which others have erroneously claimed provide habitat for native species, intact systems support approximately 30 different vascular