

**HUMBOLDT** 21st  
Century

A topographic map of Humboldt County, California, showing elevation contours and terrain. The map is oriented vertically and is the central focus of the cover page.

# GENERAL PLAN

**Humboldt County General Plan Update  
Final Environmental Impact Report**

**SCH# 2007012089**

**September 25, 2017**

HUMBOLDT COUNTY BOARD OF SUPERVISORS

First District: Rex Bohn  
Second District: Estelle Fennell  
Third District: Mike Wilson  
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HUMBOLDT COUNTY PLANNING COMMISSION

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HUMBOLDT COUNTY PLANNING AND BUILDING DEPARTMENT

John Ford, Planning Director

PROJECT STAFF

Joel Ellinwood County Counsel  
Michael Richardson: Supervising Planner  
John Miller: Senior Planner  
Michael Wheeler: Senior Planner  
Lisa Shikany Senior Planner  
Jerry von Dohlen: GIS Analyst

Note: The GPU has been years in the making, and there are many former Supervisors, Planning Commissioners and project staff not listed above that also contributed to this EIR.

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# Chapter 1. Introduction

## 1.1. Purpose of Final EIR

This document, together with the Revised Draft Environmental Impact Report (RDEIR), is the Final Environmental Impact Report (Final EIR) for the Humboldt County General Plan Update (State Clearinghouse Number 2007012089). The RDEIR identified the likely environmental consequences of the project and recommended mitigation measures to reduce or eliminate significant impacts. This document responds to public comments on the RDEIR, revises the RDEIR as necessary, and provides a Mitigation Monitoring and Reporting Program (MMRP) for the project.

According to the California Environmental Quality Act (CEQA) (as amended January 1, 2016), lead agencies are required to consult with public agencies having jurisdiction over a proposed project and to provide the general public with an opportunity to comment on the RDEIR. For this project, Humboldt County is the lead agency. This document has been prepared to respond to comments received on the RDEIR and to clarify any errors, omissions, or misinterpretations of the analysis or findings in the RDEIR.

This document, together with the RDEIR, will constitute the Final EIR if Humboldt County certifies the Final EIR as complete and adequate under CEQA.

## 1.2. Environmental Review Process

The RDEIR was made available for public review from April 19 through June 30, 2017. The general public was advised of the availability of the RDEIR through notification via email and Notices of Availability mailed to neighbors of the project site. Public agencies and interest groups were also notified by mail. The RDEIR was posted on the County's website on April 29, 2016.

During the public review period on the RDEIR, written comments were made. A copy of written comments on the RDEIR and responses to the comments can be found in Chapter II of this document.

The Final EIR will be presented to the Humboldt County Board of Supervisors at its meeting scheduled for October 10, 2017 in the Board of Supervisors Chamber, Humboldt County Courthouse, 825 Fifth Street, Eureka, California 95501. Before acting on the project, the Board of Supervisors must certify the Final EIR and adopt the MMRP (see Chapter IV of this document). In addition, the Board of Supervisors must make the necessary findings for the adoption of mitigation measures associated with the project.

## 1.3. Report Organization

This document consists of the following chapters:

- *Chapter I: Introduction.* This chapter includes a discussion of the purpose and organization of the Final EIR.
- *Chapter II: Comment Letters and Responses for the RDEIR.* This chapter contains the names of individuals and agencies commenting on the RDEIR and reproductions of letters and emails received on the RDEIR. The comments are numbered in the margins of the comment letters and responses are keyed to the comment numbers. Where revisions to the RDEIR are appropriate, these are summarized and the actual text changes are shown in Chapter III.
- *Chapter III: RDEIR Text Changes.* This chapter contains corrections or clarifications that have been made based on comments received on the RDEIR or for other reasons. The changes show language that has been added to or deleted from the RDEIR. Underlined text represents language that has been added to the RDEIR; text in ~~strikeout~~ has been deleted from the RDEIR.
- *Chapter IV: Mitigation Monitoring and Reporting Program.* This chapter identifies mitigation measures referenced in the EIR as necessary to avoid or reduce the project's potentially significant impacts and provides a program for implementation and monitoring of these measures. The timing and entity responsible for monitoring are identified.

# Chapter 2. Comment Letters and Responses for the RDEIR

This chapter includes a reproduction of each comment letter (including emails) that addressed the RDEIR and was received during the public review period. Each letter is followed by responses to comments made in the letter.

COMMENT NUMBER

## A. State and Regional Agency Comments

- 1. California Department of Transportation ..... A1-1 to A1-5
- 2. Regional Water Quality Control Board..... A2-1 to A2-2
- 3. State of California, Governor’s Office of Planning and Research  
And Division of Oil Gas and Geothermal Resources ..... A3-1 to A3-2

## B. Local Agency Comments

- 1. Humboldt County Association of Governments..... B1-1 to B1-46

## C. Public and Public Interest Group Comments

- 1. Coalition for Responsible Transportation Priorities.....C1-1 to C1-4
- 2. Marissa D’ Arpino.....C2-1to C2-16
- 3. Mercer Fraser..... C3-1
- 4. Humboldt Coalition for Property Rights... ..... C4-1 to C4-23
- 5. Kent Sawatzky... ..... C5-1
- 6. Food Fiber and Flowers... .....C6-1 to C6-2
- 7. Green Diamond Resource Company... ..... C7-1 to C7-34
- 8. Steven S. Madrone.....C8-1

## **A. State and Regional Agency Comments**



## Letter A1 California Department of Transportation

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 1, P.O. BOX 3700  
 PHONE (707) 441-4693  
 FAX (707) 445-6314  
 TTY 711  
 www.dot.ca.gov



*Making Conservation  
 a California Way of Life.*

June 30, 2017

1-HUM-General  
 SCH# 2007012089  
 Humboldt GPU DEIR

Mr. Michael Richardson Supervising Planner  
 Community Development Department  
 County of Humboldt  
 3015 H Street  
 Eureka, CA 95501

Dear Mr. Richardson:

Thank you for including Caltrans in the environmental review process for the Recirculated Draft Environmental Impact Report (RDEIR) for the Humboldt County General Plan Update (GPU). The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Caltrans Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans through the lens of our mission and state planning priorities of infill, conservation, and travel efficient development. To ensure a safe and efficient transportation system, we encourage early consultation and coordination with lead agencies and project proponents on all development projects that utilize the multimodal transportation network. We provide these comments consistent with the State's smart mobility goals that support a vibrant economy and build communities, not sprawl. The following comments are in response to the Draft EIR for the Humboldt County GPU.

Caltrans' mission and vision, as well as a number of goals and policies, have been revised to better reflect recent legislation including the following:

Assembly Bill (AB) 857, **Infrastructure Planning: Priorities and Funding** (2002), requires the State to adopt consistent planning and capital spending priorities. It establishes three priorities that encourage all state agencies to promote infill development within existing communities, protect environmental and agricultural resources, and encourage efficient development patterns overall.

Assembly Bill 32, **The California Global Warming Solutions Act of 2006**, mandates a reduction of Greenhouse Gas (GHG) emissions most responsible for climate change. Nearly 40 percent of emissions in California come from the transportation sector.

The **Sustainable Communities and Climate Protection Act of 2008**, or Senate Bill (SB) 375, legislation that required regions throughout California to improve their long-term Regional Transportation Plans (RTPs) to reflect more efficient land use, improved transportation, and

A1-1

reduced GHG emissions.

Assembly Bill 1358 (2008), the California **Complete Streets Act**, requires that the legislative body of a city or county, upon any substantive revision of the circulation element of the general plan, modify the circulation element to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban, or urban context of the general plan.

Senate Bill 391 (2009), **California Transportation Plan**, adds new requirements to meet California's climate change goals under Assembly Bill 32. SB 391 requires the state's long-range transportation plan (California Transportation Plan) to identify the "statewide integrated multimodal transportation system" needed to reduce greenhouse gas emissions from current levels by 2020, and 80-percent below the 1990 levels by 2050.

Senate Bill 743 (2013), "**The Kings Arena Bill**", exempted the Sacramento Kings Arena from CEQA compliance and attempts to promote infill development through a change in how determinations of significance are measured for transportation impacts under CEQA. New housing, commercial and office uses located within Transit Priority Areas are now exempt from CEQA. Outside of Transit Priority Areas, the Governor's Office of Planning and Research has the discretion to identify new measures of significance for determining transportation impacts under CEQA, which is expected to include Vehicle Miles Traveled (VMT).

In April of 2015, Governor Brown issued **Executive Order (EO) B-30-15** establishing a California GHG reduction target of 40 percent below 1990 levels by the year 2030, which is a mid-term goal that is consistent with California's existing long-term commitment to reduce emissions 80 percent under 1990 levels by 2050. In addition, the Governor is committed to reduce by one-half current petroleum use in cars and trucks; and manage farm and rangelands, forests and wetlands to store more carbon.

In 2016, Caltrans completed California Transportation Plan 2040, which establishes a new model for developing ground transportation systems, consistent with the above-referenced legislation:

*[Regional] plans represent a shift in long-term planning away from simply a list of transportation projects and towards a strategy for sustainable growth. Their plans value efficient land use by proposing to locate more housing closer to job centers; they recognize consumer demand by proposing to invest in numerous modes of transportation—roads, public transit, walking, and biking facilities. They value taxpayer investments by proposing to spend more on taking care of our existing assets before building more. Regions have adopted growth plans, and will soon begin revising them, to deliver the more sustainable transportation system now required by California law.*

A1-1

Over the next 25 years, California will be working to improve transit, reduce long-run repair and maintenance costs of roadways, developing a comprehensive assessment of climate-related vulnerabilities, and improving the efficiency of operations on existing facilities using transportation demand management and new technologies rather than continuing to expand capacity on existing roadways.

A1-1

We request that the Humboldt County General Plan Update strive to address transportation challenges including: transportation needs of demographic groups, specifically the youth, the aging, and low-income groups or areas that qualify for State “disadvantaged” or “severely disadvantaged” status. Suggested methods for providing a more robust transportation system include the expansion of transit capacity, frequency, and connectivity; higher proportion of funding for walking and biking projects; greater focus on more efficient land uses and denser development near transit; support for streamlined CEQA review of infill projects; and greater coordination between government and stakeholders.

A1-2

We agree with and support the County’s determination of significant and unavoidable VMT impacts within the Circulation Element of the RDEIR. With respect to VMT impacts, we have the following comments:

- Increasing VMT, whether on a per capita basis or as an absolute value, is inconsistent with State efforts to reduce GHG. County land use decisions have the potential to impact State efforts to reduce VMT on State highways.
- The “Area of Known Controversy” related to dispersed versus compact development in the General Plan Update could lead to significant impacts as a contributing factor to increasing VMT.
- Without existing or proposed Measures of Effectiveness (MOEs) for reducing VMT, we request that the County, through the implementation of the General Plan, seek to maintain consistency between the Circulation Element of the General Plan, California Transportation Plan 2040, the Regional Transportation Plan developed by Humboldt County Association of Governments (HCAOG), the Regional Transportation Planning Agency (RTPA) for Humboldt County.

A1-3

We request that the County work with Caltrans and HCAOG to establish meaningful VMT reduction strategies.

Page 3.5-9 of the Transportation Section of the Revised Draft Environmental Impact Report describes State Route 299 as a California Legal Network Highway that allows STAA (Surface Transportation Assistance Act) trucks. Please note that with the completion of the Buckhorn Grade projects in Shasta County last fall, SR 299 is in the process of being designated an STAA Terminal Access Route.

A1-4

Also on page 3.5-9 of the Transportation Section is a discussion of the Caltrans project through

A1-5

Richardson Grove State Park. We request that the RDEIR's description of the project be revised for clarity. Instead of attributing the controversy to the removal of trees (no old growth trees will be removed), the controversy can be attributed to "road improvements within a grove of old growth redwood trees, as well as concerns regarding growth inducing impacts."

A1-5

Caltrans requests to participate in the County's update of the Local Coastal Program in an effort to coordinate long-range planning efforts for adapting to Sea Level Rise. Caltrans District 1 is interested in the Humboldt Bay Area Plan and other planning areas where State highway facilities are vulnerable to the effects of Climate Change.

Caltrans offers a number of planning grants to assist the County in working to further State goals and initiatives recently established through legislation. Please visit the Caltrans Division of Transportation Planning web page, which includes a tab for grant programs:  
<http://www.dot.ca.gov/transplanning/index.html>.

A1-6

## Responses to California Department of Transportation - Letter A1

**Comment A1-1:** This comment states the GPU should strive to address transportation challenges. Suggestions include improved transit, increased funding for walking and bicycling projects, denser land uses near transit, streamlining CEQA review of infill projects, and improved coordination among stakeholders including government.

**Response to Comment A1-1:** Comment noted. These are all desirable goals of the GPU but the comment does not address the RDEIR.

**Comment A1-2:** This comment states the GPU should strive to address transportation challenges. Suggestions include improved transit, increased funding for walking and bicycling projects, denser land uses near transit, streamlining CEQA review of infill projects, and improved coordination among stakeholders including government.

**Response to Comment A1-2:** Comment noted. These are all desirable goals of the GPU but the comment does not address the RDEIR.

**Comment A1-3:** Caltrans agrees that VMT impacts are significant and unavoidable. However, they assert this is inconsistent with State efforts to reduce VMT. The “dispersed vs. compact development” contributes to increased VMT. They state there should be consistency among the General Plan Circulation Element, the California Transportation Plan 2040, and the Regional Transportation Plan developed by HCAOG. Finally, they recommend the County work with Caltrans and HCAOG to develop VMT reduction strategies.

**Response to Comment A1-3:** Comment noted. The DEIR concludes the patterns of development in the County are well-established and will not change substantially due to the very modest growth projections for the GPU. Indeed, the County shares the concerns of Caltrans and HCAOG to reduce VMT, in part through consistency with goals of, and cooperation with, all applicable agencies.

**Comment A1-4:** This comment states that recent projects on SR 299 at the Buckhorn Grade are resulting in enhanced STAA designation status that should be reflected.

**Response to Comment A1-4:** The text of the second paragraph on page 3.5-9 of the RDEIR is revised to reflect this upgraded status as follows:

“Additionally, there is an economic effect on transportation costs due to the limitations on large STAA truck sizes on both U.S. 101 at Richardson Grove and on State Route 299 at Buckhorn Grade. Because of the restrictions on the length of trucks that can travel this route into the County, goods often need to be transferred to smaller trucks, which increase the transportation cost of goods shipped to and from the County. With completion of the Buckhorn Grade projects in Shasta County in 2016, State Route 299 is in the process of being designated an STAA Terminal Access Route. State Route 299 from Arcata to Trinity County is considered a California Legal Network highway and allows that will allow STAA trucks.”

**Comment A1-5:** In this comment, Caltrans request that the description of the reason for controversy surrounding an improvement project in Richardson Grove State Park be revised so that the controversy is attributed to “road improvements within a grove of old redwood trees, as well as concerns regarding growth inducing impacts.”

**Response to Comment A1-5:** The text of the third paragraph on page 3.5-9 of the RDEIR is revised to reflect the suggested language:

“ Caltrans has completed a Final EIR (SCH # 2009012070) for a project to provide access for larger trucks on U.S. 101 through Richardson Grove State Park near the Humboldt County line. The proposed project extends from post mile (Humboldt) 1.1 to post mile (Humboldt) 2.2 and would include minor realignments and widening of the existing roadway, culvert improvements, and repaving the roadway. This project has been controversial because it involves ~~road improvements and the removal of trees within a State Park~~ road improvements within a grove of old growth redwood trees, as well as concerns regarding growth inducing impacts.

**Comment A1-6:** Caltrans requests to participate in the County's update of the Local Coastal Program in an effort to coordinate long-range planning efforts for adapting to Sea Level Rise. Caltrans District 1 is interested in the Humboldt Bay Area Plan and other planning areas where State highway facilities are vulnerable to the effects of Climate Change. Caltrans offers a number of planning grants to assist the County in working to further State goals and initiatives recently established through legislation.

**Response to Comment A1-6:** Comment noted. The County is committed to working collaboratively with CalTrans to mitigate the impacts of sea level rise on its facilities.

## Regional Water Quality Control Board - Letter A2



## North Coast Regional Water Quality Control Board

June 29, 2017

Mr. Michael Richardson  
 Humboldt County Community Development Services  
 3015 H Street  
 Eureka, CA 95501

Dear Mr. Richardson:

Subject: Comments on the General Plan 2017 DEIR, SCH No. 2007012089

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the 2017 General Plan Amendment and tentative language adopted by the Humboldt County Board of Supervisors (Board of Supervisors). The North Coast Regional Water Quality Control Board (Regional Water Board) is a responsible State agency with jurisdiction over the quality of groundwater and surface waters (including wetlands) and the protection of the beneficial uses of those waters.

Regional Water Board staff reviewed the tentative language adopted by the Board of Supervisors and the DEIR dated April 2017 for the General Plan, and offer the following comments. The general comments are listed below. In the case of specific suggested language related to climate change, which we hope the Board will consider, we have identified it in ~~strikeout~~ / underline in the attached documents: Chapters 9, 11, 14, and 15 of the 'Chapters Tentatively Approved by the Board of Supervisors (2015) showing edits From Planning Commission Draft (2012)'.

#### GENERAL COMMENTS

The Regional Water Board would like to be viewed as a partner with the County in water quality protection. We have worked closely with the County on a project-by-project basis in the past and we look forward to continuing to do so.

Regional Water Board staff shares the concerns of the California Department of Fish and Wildlife (CDFW) related to aquatic species and habitat and supports their recommendations. Below is a list of the general categories our agency is concerned about as they relate to water quality and beneficial uses. Regional Water Board authorities and that of CDFW coincide with respect to several of these important issues.

- Surface water and groundwater
- Aquatic species and wildlife
- Riparian and instream habitat

A2-1

- Watershed planning
- Wetlands
- Water supply
- Storm water
- Low Impact Development
- Cannabis-related impacts

### Climate Change

The issue of climate change will likely evolve and change over the timeframe addressed in this General Plan. Regional Water Board staff encourage Humboldt County to proceed with due diligence to address issues related to climate change that can affect any number of water quality and beneficial uses. The County should consider the following:

- Climate change is a risk multiplier when it comes to water quality conditions. That is, existing water quality impacts and landscape vulnerabilities are likely to worsen under future altered climatic conditions.
- Forward thinking and planning is essential to reducing risks associated with potential climate change impacts. Climate change adaptation plans should be incorporated into the County's General Plan.
- Numerous mitigation measures appropriate to adapt to changing climatic conditions have multiple environmental benefits (e.g. forest retention for carbon sequestration may reduce erosion and subsequent sediment discharge from hillslopes). Use of such measures should be a high priority now and in the future.
- The County is advised to conduct and/or participate with Cities to conduct a comprehensive climate change assessment specific to the potential effects of drought, high intensity winter storms, and sea level rise (SLR) on wastewater infrastructure. The effect of such altered conditions should be assessed with respect to wastewater treatment facilities, sewerage collection systems, disposal areas, and vulnerable areas serviced by onsite waste treatment systems (OWTS). Vulnerable areas of most concern include floodplains and the low gradient areas (e.g., diked and drained wetlands) surrounding Humboldt Bay.

A2-2



## Responses to Regional Water Quality Control Board (RWQCB) - Letter A2

**Comment A2-1:** The comment begins with general statements, “The Regional Board would like to be viewed as a partner with the County in water quality protection...Regional Board staff shares the concerns with CDFW related to aquatic species and habitat and supports their recommendations.” The comment lists issues shared in common with CDFW including surface water and groundwater.

**Response to Comment A2-1:** Comment noted. CDFW did not comment on the DEIR, but their recommendations and suggestions over the years have been incorporated into the GPU, which is supported by the RWQCB.

**Comment A2-2:** The comment encourages the County to “proceed with due diligence to address issues related to climate change that can affect any number of water quality and beneficial uses.” The comment identifies considerations and issues for developing a climate change adaptation strategy.

**Response to Comment A2-2:** Comment noted. The considerations raised by the RWQCB will be relevant for development of the County’s Climate Action Plan which will be developed through Implementation Measure AQ-IM3:

“**AQ-IM3. County-wide Climate Action Plan.** Develop and implement a Climate Action Plan that effectively mitigates the carbon emissions attributable to this Plan, consistent with the requirements of the state Global Warming Solutions Act and subsequent implementing legislation and regulations.”

Letter A3 - State of California, Governor's Office of Planning and Research and Division  
of Oil Gas and Geothermal Resources



EDMUND G. BROWN JR.  
GOVERNOR

June 8, 2017

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE OF PLANNING AND RESEARCH  
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX  
DIRECTOR

Michael Richardson  
Humboldt County Planning Division  
3015 H Street  
Eureka, CA 95501

Subject: Humboldt County General Plan Update  
SCH#: 2007012089

Dear Michael Richardson:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on June 7, 2017, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

A3-1

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2007012089  
**Project Title** Humboldt County General Plan Update  
**Lead Agency** Humboldt County

**Type** EIR Draft EIR  
**Description** The project consists of updating the Humboldt County General Plan (referred to as the proposed General Plan Update or GPU for purposes of this EIR). A complete project description is in chapter 2 of this EIR, but in Summary, the GPU is intended to be a comprehensive update of the County's current 1984 General Plan. The General Plan expresses the community's goals for the distribution of future land uses for approximately the next 20 years, both public and private, and establishes policies, standards and implementation measures for future development. It reviews and revises the basic assumptions regarding population projections and future land use demand and proposes land use designations and diagrams (maps), together with policies to meet that demand in a manner consistent with State law.

**Lead Agency Contact**

**Name** Michael Richardson  
**Agency** Humboldt County Planning Division  
**Phone** 707-268-3723 **Fax** 707 268-3792  
**email**  
**Address** 3015 H Street  
**City** Eureka **State** CA **Zip** 95501

**Project Location**

**County** Humboldt  
**City**  
**Region**  
**Lat / Long**  
**Cross Streets**  
**Parcel No.**  
**Township** **Range** **Section** **Base** HB&M

**Proximity to:**

**Highways**  
**Airports**  
**Railways**  
**Waterways**  
**Schools**  
**Land Use** update to GP

**Project Issues** Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Landuse; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply; Aesthetic/Visual; Coastal Zone; Economics/Jobs; Forest Land/Fire Hazard; Schools/Universities; Septic System; Sewer Capacity; Solid Waste; Vegetation; Wetland/Riparian; Growth Inducing; Cumulative Effects; Agricultural Land

**Reviewing Agencies** Resources Agency; Department of Conservation; Department of Fish and Wildlife, Region 1E; Department of Parks and Recreation; Department of Water Resources; Caltrans, District 1; Regional Water Quality Control Board, Region 1; Native American Heritage Commission

**Date Received** 04/21/2017 **Start of Review** 04/24/2017 **End of Review** 06/07/2017

A3-1



State of California • Natural Resources Agency  
Department of Conservation  
**Division of Oil, Gas, and Geothermal Resources**  
Northern District – Sacramento  
801 K Street • MS 18-05  
Sacramento, CA 95814  
(916) 322-1110 • FAX (916) 445-3319

Edmund G. Brown Jr., Governor  
Kenneth A. Harris Jr., State Oil and Gas Supervisor

CLEAR  
6-7-17  
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June 6, 2017

Governor's Office of Planning & Research

JUN 06 2017

STATE CLEARINGHOUSE

State Clearinghouse  
PO Box 3044  
Sacramento, CA 95812-3044

Subject: CEQA project: SCH #2007012089  
Lead Agency: Humboldt County  
Project Title: Humboldt County General Plan Update

Ladies/Gentlemen:

The Division of Oil, Gas, and Geothermal Resources (Division) oversees the drilling, operation, maintenance, and plugging and abandonment of oil, natural gas, and geothermal wells. Our regulatory program emphasizes the wise development of oil, natural gas, and geothermal resources in the state through sound engineering practices that protect the environment, prevent pollution, and ensure public safety. Northern California is known for its rich gas fields and Humboldt County for one of the first oil fields in California at Petrolia.

From the California Office of Historic Preservation:

"California's first drilled oil wells that produced crude to be refined and sold commercially were located on the North Fork of the Mattole River approximately three miles east of here. The old Union Mattole Oil Company made its first shipment of oil from here, to a San Francisco refinery, in June 1865. Many old well heads remain today."

The Division maintains digital production data dating back to 1977. From the years 1977 to 2016 64,232,699 (Mcf) of natural gas was produced from gas wells located in Humboldt County (Figure 1). Currently there are two active fields and one idle field in Humboldt County (Figures 2 and 3). Tompkins Hill Gas Field, located approximately 1-mile north of Fortuna, has 22 active wells and 17 idle wells. The Grizzly Bluff Gas Field located near Ferndale has 3 active wells and 7 idle wells. The Petrolia Gas field has 3 idle wells that are shut in and not producing gas. We do not have any records of the oil production.

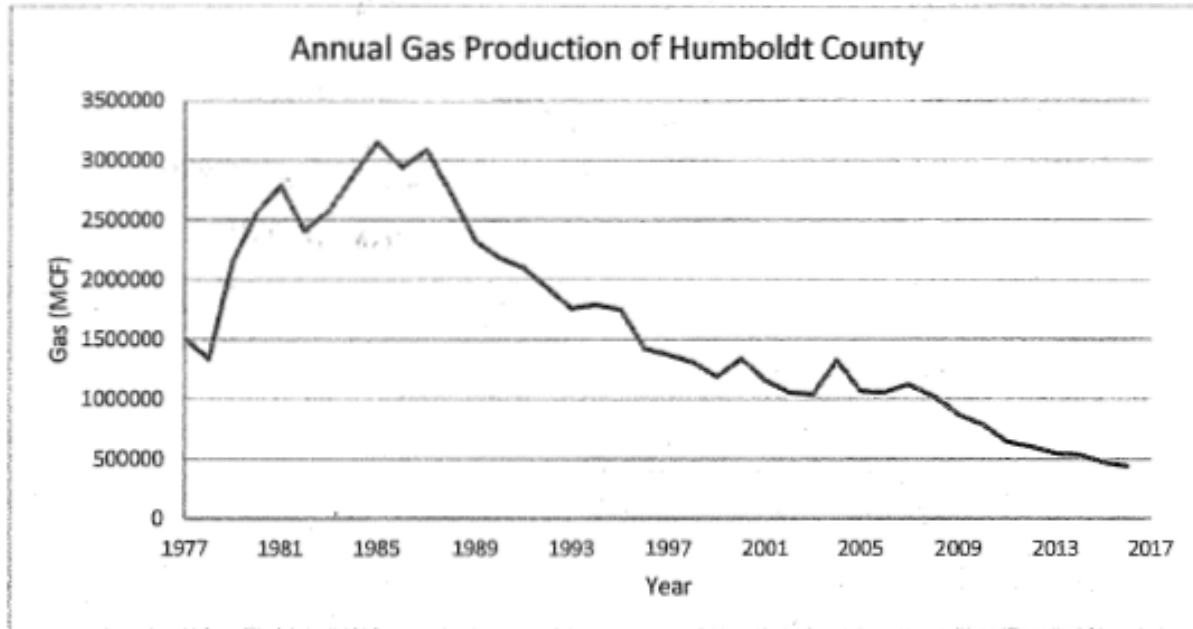
Data for wells located on private and public land shown on the maps can be found at the Division's websites:

<http://maps.conservation.ca.gov/doggr/wellfinder/#close>

<https://secure.conservation.ca.gov/WellSearch>

A3-2

State Clearinghouse  
 CEQA project: SCH#2007012089  
 June 6, 2017  
 Page 2



**Figure 1** Annual production of natural gas from Humboldt County 1977-2016.

Permitting agency(s) and property owner(s) should be aware of, and fully understand, that significant and potentially dangerous issues may be associated with development near oil and gas wells. These issues are non-exhaustively identified in the following comments, and are provided by the Division for consideration by the permitting agency, in conjunction with the property owner and/or developer, on a parcel-by-parcel or well-by-well basis.

1. Maintaining sufficient access to an oil or gas well may be generally described as maintaining "rig access" to the well. Rig access allows a well servicing rig and associated necessary equipment to reach the well from a public street or access way, solely over the parcel on which the well is located. A well servicing rig, and any necessary equipment, should be able to pass unimpeded along and over the route, and should be able to access the well without disturbing the integrity of surrounding infrastructure.
2. The Division recommends that a permitting agency consider the use of surface mitigation measures as a condition for project approval, if and when appropriate. Examples of surface mitigation measures include venting systems for wells, venting systems for parking lots, patios, and other hardscape, methane barriers for building foundations, methane detection systems, and collection cellars for well fluids. The Division **does not** regulate the design, installation, operation, or adequacy of such measures. The Division recommends that such surface mitigation measures are designed, installed, and operated by qualified engineers. The permitting of surface mitigation measures falls under the jurisdiction of the permitting agency.
3. If during the course of development of a parcel any unknown well(s) is discovered, the Division should be notified immediately so that the newly discovered well(s) can be incorporated into the records and investigated.

State Clearinghouse  
CEQA project: SCH #2007012089  
June 6, 2017  
Page 3

4. The Division recommends that any soil containing significant amounts of hydrocarbons to be disposed of in accordance with local, state, and federal laws. Please notify the appropriate authorities if soil containing significant amounts of hydrocarbons is discovered during development.
5. The Division recommends that any wells found in the course of this project and any pertinent information obtained after the issuance of this letter, be communicated to the appropriate county recorder for inclusion in the title information of the subject real property. This is to ensure that present and future property owners are aware of (1) the wells located on the property, and (2) potentially significant issues associated with any improvements near oil or gas wells.

No well work may be performed on any oil or gas well without written approval from the Division in the form of an appropriate permit. This includes, but is not limited to, mitigating leaking fluids or gas from abandoned wells, modifications to well casings, and/or any other re-abandonment work. (NOTE: the Division regulates the depth of any well below final grade (depth below the surface of the ground). Title 14, Section 1723.5 of the California Code of Regulations states that all well casings shall be cut off at least 5 feet but no more than 10 feet below grade. If any well needs to be lowered or raised (i.e. casing cut down or casing riser added) to meet this grade regulation, a permit from the Division is required before work can start.)

To reiterate, the permitting agency, property owner, and/or developer should be aware of, and fully understand, that the above comments are made by the Division with the intent to encourage full consideration of significant and potentially dangerous issues associated with development near oil or gas wells.

Thank you for the opportunity to comment on this project.

Sincerely,

*Charlene L Wardlow*

Charlene L Wardlow  
Northern District Deputy

A3-2

**Responses to State of California, Governor's Office of Planning and Research and Division of Oil Gas and Geothermal Resources - Letter A3**

**Comment A3-1:** The Office of Planning and Research documents their referral process for the DEIR that was submitted to them April 21, 2017. Their review period began April 24, 2017 and ended June 7, 2017.

**Response to Comment A3-1:** Comment noted. The Board of Supervisors continued to accept comments on the DEIR through June 30, 2017.

**Comment A3-2:** The comment provides information about the records maintained by the Division of Oil, Gas and Geothermal Resources, and provides information to permitting agencies and property owners about permitting new oil, gas and geothermal resource extraction operations, and treatment of inadvertent discovery of existing unknown wells.

**Response to Comment A3-2:** Comment noted. The County's permitting process for new gas and oil wells includes referrals to the Division of Oil, Gas and Geothermal Resources for comments. In this way, the County helps inform applicants and nearby property owners of significant and potentially dangerous issues associated with development near oil or gas wells consistent with the recommendations from the Division.

**B. LOCAL AGENCY COMMENTS**



Letter B1 - Humboldt County Association of Governments



MEMO

DATE: June 30, 2017  
 TO: John Miller, Senior Planner, Humboldt County Planning & Building  
 FROM: Oona Smith, Senior Planner, HCAOG  
 RE: County GPUP-RDEIR (May 2017) Proofreading & Comments

Page #	Draft Version	Suggested Edit	
3.5-4	S.R. 211 is a short two-lane highway that extends from U.S. 101 to the City of Ferndale, <u>crossing the Eel River over historic Fernbridge.</u>	crossing historic Fernbridge over the Eel River	B1-1
3.5-5	...as part of the <u>2008</u> Regional Transportation Plan (see Humboldt County Regional Transportation Plan, 2008, Table HR1, Significant Roadway and the discussion on Page HR-1):...	See current 2014 RTP ("VROOM"). (Which is also now being updated – ETA Dec. 2018.)	B1-2
3.5-6	<u>Redwood Transit System.</u> In addition to the mainline route serving US 101, a separate route...	add: Tish Non-Village service. There is also Fortuna Transit, provided for seniors and persons with a disability.	B1-3
3.5-7	<b>Non-Motorized Transportation</b> (paragraph 2) Such obstructions and impediments can force pedestrians on foot <u>or who use</u> wheelchairs onto road shoulders, and into parking and bike lanes.	"or those who use..." or "or people who use..."	B1-4
3.5-7	While equine use does not constitute a <u>significant</u> portion of daily commuter travel in Humboldt County,	perceivable or noticeable or detectable	B1-5
3.5-8	...street crossings that pose pedestrian travel impediments, especially to the mobility-impaired. <u>Most facilities</u> dedicated for bicycle use are in the...	mobility-impaired. ¶ <i>{new paragraph}</i> Most facilities dedicated for bicycle use are in the...	B1-6
3.5-8	The Elk River Hikshari' Trail <u>(is a</u> multiple-use, paved trail that runs between Truesdale Avenue (just south of the Bayshore Mall)	remove opening parenthesis	B1-7
3.5-8	Humboldt County <u>is</u> the lead agency in the Humboldt People Powered Pathways (HP3) funding proposal to the federal government. The HP3 proposal <u>seeks</u> transportation funding to implement local jurisdiction's plans for improving active transport systems and programs. The HP3 plan identifies approximately 25 active transport planning, implementation programs, and partnerships that identify <u>\$50</u> non-motorized transportation projects located across the Coun	is? present tense?  sought?  \$50 million worth of?	B1-8
3.5-9	Caltrans has completed a Final EIR (SCH # 2009012070) for a project to provide access for larger trucks on U.S. 101 through Richardson Grove State Park near the Humboldt County line.	Completed and EIR Addendum, FONSI, and NOD in May 2017. dot.ca.gov/dist1/d1projects/Richardson_grove	B1-9
3.5-10	...the only airport in the County with scheduled passenger flights, and passenger enplanements are		B1-10

Page #	Draft Version	Suggested Edit	
	expected to increase from 98,453 in 204 to 167,000 in 2024 (Arcata-Eureka Airport Master Plan Report, Chapter 2 Airport Role and Activity)	typo: 2004 add comma after Chapter 2	B1-10
3.5-11	Any other area that requires dredging is the responsibility of local <u>governments, in this area that is the Harbor District.</u>	...governments; in this area the Harbor District is that agency.	B1-11
3.5-12	Implementation of the proposed General Plan Update would increase the amount of traffic on roadways and could increase the potential for conflict with agricultural vehicles.	<i>Move to analysis section</i>	B1-12
3.5-12	...found that <u>Pedestrian</u> and bicycle safety is generally poor in Humboldt <u>County when compared to</u> other rural counties. There are substantially higher bicycle injuries and fatality rates in Humboldt County than all other rural areas in California. Bicycle injury and fatality rates are also significantly higher than the state average, particularly for youth and the <u>05-24 age groups</u> . In spite of this, bicycle and pedestrian injuries and fatalities are decreasing in Humboldt County.	pedestrian ...County compared to...  ...and the 15-24? age groups?	B1-13
3.5-13	...are to support the <u>Regional</u> transportation planning process <sup>4</sup> , to evaluate potential improvements...	regional	B1-14
3.5-14	...volume to capacity ratio...	volume-to-capacity	B1-15
3.5-14	...the volume <u>to capacity</u> ratio is used to measure LOS.	volume-to-capacity	B1-15
3.5-14	<b>2010 Scenario</b> The transportation analysis <u>zones</u> cover the entire County and each <u>city and</u> include existing and projected future population and employment levels.	and each city, and <i>?The zones include pop and emp levels?</i>	B1-16
3.5-14	<b>2028 Scenario</b> ... <u>worse-case</u> scenario.	worst?	B1-17
3.5-15	As shown, the forecast <u>18 year</u> and 30-year growth...	18-year	B1-17
3.5-18	There are no are no adopted plans, ordinances or policies	There are no <del>are no</del> adopted plans,...	B1-18
3.5-18 to 19	The Eureka Community Plan contains a general goal that does not include an MOE: Policy <u>4220.1</u> "the County shall strive to maintain a Level of Service of C or better on arterials in the Planning Area. The acceptable level of service goal will be consistent with the financial resources available and the limits of technical <u>feasibility</u> . Plans adopted by HCAOG do not contain required MOEs or LOSs.	... 4220.1, "the...  <i>feasibility." {end quote here?}</i>	B1-19
3.5-19	The County General Plan Update seeks to reduce vehicle miles traveled per person by <u>providing</u> balanced transportation opportunities, <u>whereby</u> the needs of motorized vehicles, public transit, bicyclists, and pedestrians are <u>considered</u> during land use and transportation planning.	Awk: the provision and the consideration seems backwards—?	B1-20
3.5-19	Policy C-P2, Consideration of Land Uses in Transportation Decision Making, <u>notes</u> that a comprehensive planning approach be utilized that	<del>notes</del> <u>mandates</u> or <u>stipulates</u> <i>Policy C-P2 doesn't consider what</i>	B1-21

Page #	Draft Version	Suggested Edit	
	considers the <u>transportation consequences of land use changes to avoid</u> operational and economic impacts.	<i>consequences land use changes will have on transportation (as this awkwardly states); it directs the County to decide on transportation projects based on existing and planned future land development. General Plan (Jan. 3, 2017): C-P2. Consideration of Land Uses in Transportation Decision Making. Transportation decisions shall be based on a comprehensive planning approach that considers existing land uses, principally permitted land uses and future land development as proposed in adopted County plans and plans of other governmental agencies.</i>	B1-21
3.5-20	Table 3.5-7 lists only one road in the City of Eureka, that would be affected by the implementation of General Plan Update, and countywide growth expected to occur <u>during planning</u> period, that is the responsibility of Caltrans.	<i>{awfully complicated syntax} add comma or delete comma: ...one <u>road</u>, in the City of <u>Eureka</u>, that would be affected by the implementation of General Plan Update, and countywide growth expected to occur during <u>the</u> planning...</i>	B1-22
3.5-20	development for each <u>affect</u> jurisdiction. <u>Policy C-P5, Level of Service Criteria</u> , requires that the County shall strive to maintain level of service “C” on all roads and intersections except U.S. 101, where level of service D is acceptable, and advises that the County should not adversely affect Level of Service and/or Quality of Service for other modes of transportation, if possible. This policy compliments policies contained in the City of Eureka General Plan. <u>Policy C-P6, Jurisdictional Coordination and Integration</u> , furthers the level of service standard consistency between the County...	affected  <i>Still relying on LOS?</i>	B1-23
3.5-20	Policy C-P7, Joint Use of Traffic Models, <u>encourages</u> the County-Wide Transportation Plan (CWTP) and projects...to use area-wide travel demand models.	<i>How do you encourage a plan to use TDM?</i>	B1-24
3.5-20	Mitigation 3.5.3.1.a ...with new large scale development...	large-scale	B1-25
3.5-23	3. Consider widening the curbs to provide additional travel lanes, bike lanes, 2WLTL, medians, parking lanes, and sidewalks, all as needed to meet demands.	<i>You’d have to widen <u>in between</u> curbs, no? (i.e., widen the ROW. Widening the curb will only provide additional sidewalk; it will narrow all the other lanes)</i>	B1-26
3.5-23	C-Px. Countywide Traffic Impact Fee Program. In coordination with the cities within the County, <u>shall develop</u>	typo (missing subject)	B1-27
3.5-24	Conclusion ...fall to LOS “D/E”; therefore, implementation of the General Plan Update would result	<i>This is inconsistent with SB 743.</i>	B1-28

Page #	Draft Version	Suggested Edit
	in a potentially significant impact.	
3.5-25	...Kmart <u>Traffic Signal</u> to Washington Street, Broadway has a TWLTL. The Broadway corridor is approximately 3 miles in length.	traffic signal
3.5-25	(City of Eureka General Plan Update Mobility Policy <u>Paper</u> )	Paper)
3.5-25	...would <u>reduce the</u> LOS of the U.S. 101 Broadway corridor <u>at or below</u> "D," which is the General Plan update LOS standard...	reduce <u>to</u> the at or <u>to</u> below
3.5-26	Mitigation Measure <u>3.5.3.1.d</u> , impacts related to the future capacity of U.S 101 would be reduced and LOS D is considered acceptable on U.S. 101.	3.5.3.2.d
3.5-26	Main Street and Fortuna Blvd (North and South) in Fortuna <u>are the former alignment of</u> U.S. 101, prior to the construction of the freeway along the western edge of the City.	... <u>were the formerly alignment</u> U.S. 101...
3.5-26	Intersection improvements at 12th and <u>Main also</u> required. After mitigation, these intersections will drop to D. <u>Policy TC-1.2 says</u> LOS D is acceptable on Main Street.	...Main <u>are</u> also... <u>Fortuna General Plan Policy TC-1.2 says...</u>
3.5-26	See the discussion of Impact <u>3.5.3.2.-4</u> above for a discussion of General Plan	Wrong #
3.5-26	<u>improvements</u> , typically include <u>the addition of</u> travel lanes, and this would mean adding lanes to areas that are largely built out, <u>leaving little</u> available space to create new lanes without taking land from adjacent <u>properties. or degrade</u> the desired downtown amenities in the area. <i>{This is a really looong sentence.}</i>	<del>improvements,</del> <i>(delete comma)</i> typically include <u>adding</u> travel lanes, and this would mean adding lanes to areas that are largely built out, <u>where there is</u> little available space to create new lanes without taking land from adjacent <del>properties.</del> <i>(delete period)</i> or degrading <del>the desired</del> downtown amenities in the area. <i>{You don't really degrade desired (i.e. non-existing) amenities. Do you mean desirable?}</i>
3.5-27	...Kenmar Road/U.S. 101 North Ramps...	...Kenmar Road/U.S. 101 north ramps...
3.5-27	See the discussion of Impact <u>3.5.3.2.-4</u> above for a discussion of General Plan Update Circulation Element policies relating to minimum LOS standards and jurisdictional coordination. In particular, the General Plan Update Circulation Element includes the following policy relating to minimum LOS standards, C-P5, Level of Service Criteria, which strives to maintain a LOS "C" on all roadway segments, except for any portion of U.S. 101, where Level of Service D would be acceptable. See Impact <u>3.5.3.12.c-1</u> above, for a discussion of how Policies C-P6 Jurisdictional Coordination and Integration, and C-P7 Joint Use of Traffic Model, lessen potential impacts.	Policy #

B1-29

B1-30

B1-31

B1-32

B1-33

B1-34

B1-35

B1-36

B1-37

B1-38

Page #	Draft Version	Suggested Edit	
3.5-28	...that could <u>Conflict</u> with an...	...that could conflict with an...	B1-39
3.5-28	c) Conflict with an applicable congestion management program,...	b)	B1-40
3.5-29	Mitigation Measure <u>3.5.3.2.a</u> will add...	Policy C-IMX7	B1-41
3.5-30	...has established airport land use compatibility plans for each airport, except <u>Samoa Field</u> .	and Hoopa?	B1-42
3.5-30	...Humboldt County Airport contains of future airport operations <u>forecasts</u> .	contains <u>forecasts</u> of future airport operations.	B1-43
3.5-31	Aviation <u>Systems</u> Element. Samoa Field, Hoopa Airport, and Shelter Cove Airport are not anticipated to experience increases in aircraft operations in the next 20 years. The airport master plans identify the improvements <u>if any that</u> may be required to accommodate future aircraft operations.	System  ,if any, that...	B1-44
3.5-32	<b>Analysis of Relevant General Plan Update Policies</b> ...Circulation Element contains policies to ensure that roadway design <u>reduces</u> roadway safety hazards and <u>accommodate</u> multi-modal <u>users</u> .	accommodates "multi-modal users" — It is better policy to accommodate <i>multi-modes</i> . That way you also accommodate the hypothetical users who use only a single mode.	B1-45
	The Circulation Element includes policies and standards <u>that that</u> relate to	that <del>that</del>	B1-46

## Responses to Humboldt County Association of Governments - Letter B1

**Comment B1-1:** This comment suggests that a sentence relating to State Route 211 in the environmental setting be revised for clarity.

**Response to Comment B1-1:** To provide additional clarity regarding State Route 211, the discussion of State Highways/Routes on Page 3.5-4 of the RDEIR is revised as follows:

- S.R. 211 is a short two-lane highway that extends from U.S. 101 to the City of Ferndale, crossing historic Fernbridge over the Eel River ~~over historic Fernbridge~~.

**Comment B1-2:** This comment identifies an error in the reference to the current Humboldt County Regional Transportation Plan, which should be 2014 and not 2008.

**Response to Comment B1-2:** To correct the reference to the discussion of Regionally Significant Streets and Roadways in the Humboldt County Regional Transportation Plan, the text at the top of Page 3.5-5 of the RDEIR is revised as follows:

"In addition, Humboldt County has identified the following roads as Regionally Significant Streets and Roadways as part of the ~~2008~~2014 Regional Transportation Plan (see HCAOG 20-Year Humboldt County Regional Transportation Plan, 2014, 2008 Table HR Streets-1 Regionally, Significant Roadways and the discussion on page HR 4 of the "Existing Roadway System" from page 24 to 28):"

**Comment B1-3:** The comment adds missing information regarding the following transit service providers: Tish Non-Village service and Fortuna Transit.

**Response to Comment B1-3:** To supplement the information regarding transit service providers, the discussion after the heading "Redwood Transit System" on Page 3.5-6 of the RDEIR is revised as follows:

**Redwood Transit System.** The Redwood Transit System (RTS) consists of "mainline" commuter service along the U.S. 101 corridor from Scotia to Trinidad. Regular commute service is available to McKinleyville, as well as regional service to the California Redwood Coast – Humboldt County Airport. Although some trips serve the entire corridor, most trips provide service only along shorter sections of the route. Service was recently added to southern Humboldt, now connecting Garberville, Redway, Phillippsville, Miranda, Myers Flat, and Weott with the Humboldt Bay area. In addition to the mainline route serving U.S. 101, ~~a separate route~~ Tish Non-Village service provides service between Willow Creek and various locations in Arcata and McKinleyville.

and...

**Fortuna Transit.** The City of Fortuna operates Fortuna Transit, which provides transportation within the City limits to seniors or persons with a disability.

**Comment B1-4:** The comment suggests edits to a sentence relating to the American with Disabilities Act (ADA) for Non-Motorized Transportation to improve readability. To clarify a statement regarding the American with Disabilities Act (ADA),

**Response to Comment B1-4:** Page 3.5-7 of the RDEIR is revised as follows:

“Pedestrian facilities, primarily sidewalks and crosswalks, are also most commonly provided in the urban areas. Most pedestrian facilities were constructed prior to the American with Disabilities Act (ADA) and are therefore not compliant. Compliance issues include inadequate sidewalk width, excessive cross-slope, inadequate curb ramps at intersections, and obstacles in the sidewalk. Such obstructions and impediments can force pedestrians on foot or those who use wheelchairs onto road shoulders, and into parking and bike lanes. Over time, the County Department of Public Works is upgrading pedestrian facilities to be ADA compliant.”

**Comment B1-5:** The comment recommends a better word choice to describe the proportion of commuters using horses.

**Response to Comment B1-5:** To clarify a statement regarding equine commuters, the paragraph at the top of Page 3.5-7 of the RDEIR is revised as follows:

“Rural areas and small communities do not often have pedestrian facilities that are separated from the roadway. Pedestrians and bicyclists frequently utilize roads in Humboldt County that lack sidewalks and/or bicycle lanes. As a result, sharing of roadways by pedestrians, car and truck drivers, bicyclists, and even equestrians, is common in many rural areas. While equine use does not constitute a ~~significant~~ detectable portion of daily commuter travel in Humboldt County, equestrian trails can be a significant recreational resource. A number of community and public land trail systems provide transportation and recreation opportunities; however, most of the facilities dedicated exclusively for non-motorized use are provided only in urban areas of the County.”

**Comment B1-6:** The comment identifies a missing space between paragraphs.

**Response to Comment B1-6:** To correct paragraph spacing, the second paragraph from the top of Page 3.5-8 of the RDEIR is revised as follows:

Pedestrian facilities are most commonly found in the County’s seven cities and larger unincorporated communities. Sidewalks and pathways of varying width are found in commercial areas, residential neighborhoods, and near schools. In many cases, existing sidewalks meet only the minimum ADA standards and often are obstructed by utility poles, signposts, and other obstacles. There are also sidewalk gaps, uncontrolled intersections, and street crossings that pose pedestrian travel impediments, especially to the mobility-impaired.

Most facilities dedicated for bicycle use are in the urban and suburban areas of the County, with bicycle lanes in place in Eureka, Arcata, McKinleyville and Fortuna. The City of Arcata provides the most interconnected system of bicycle lanes/routes that facilitates access to and from a number of trip-generating areas. In Eureka, the bike lane/route system includes both north-south and east-west lanes; however, not all trip generating areas are connected. Fortuna has limited systems of bike lanes and designated routes.

**Comment B1-7:** The comment identifies an open parenthesis at the top of Page 3.5-8.

**Response to Comment B1-7:** To the open parenthesis, the last paragraph from the top of Page 3.5-8 of the RDEIR is revised as follows:

“The Elk River Hikshari’ Trail (is a multiple-use, paved trail that runs between Truesdale Avenue (just south of the Bayshore Mall) 1.5 miles south to the Pound Road Park & Ride lot, off the Herrick Avenue and Highway 101 interchange.”

**Comment B1-8:** The comment identifies outdated references to the Humboldt People Powered Pathways (HP3) non-motorized funding proposal.

**Response to Comment B1-8:** To revise the references to the HP3 proposal, the first paragraph of Page 3.5-9 of the RDEIR is revised as follows:

“In conjunction with other cities and counties across the nation, Humboldt County is was the lead agency in a funding proposal to the federal government in 2009, called the Humboldt People Powered Pathways (HP3) funding proposal to the federal government. The HP3 proposal seeks sought transportation funding to implement local jurisdiction’s plans for improving active transport systems and programs as part of 2010 Campaign for Active Transportation. The Campaign for Active Transportation was a national effort aimed at the inclusion of a program that provides funding for non-motorized systems (vs. singular projects) as a permanent program in the federal transportation legislation reauthorization. The HP3 plan identifiesd approximately 25 active transport planning, implementation programs, and partnerships that identify related to approximately \$50 million of non-motorized transportation projects located across the County. Although the HP3 funding proposal was unsuccessful, a number of the individual projects included in the proposal have since been funded and the interagency coordination to improve active transport systems and programs continues.”

**Comment B1-9:** The comment provides updates to references to the Caltrans Richardson Grove project.

**Response to Comment B1-9:** To revise the references to the Caltrans Richardson Grove project, the second paragraph from the bottom of Page 3.5-9 of the RDEIR is revised as follows:

“Caltrans has completed a Final EIR (SCH # 2009012070) and Addendum to the EIR, a Finding of no Significant Impact, and a Notice of Determination in May 2017 (see project web page at [http://www.dot.ca.gov/dist1/d1/projects/richardson\\_grove/](http://www.dot.ca.gov/dist1/d1/projects/richardson_grove/)) for a project to provide access for larger trucks on U.S. 101 through Richardson Grove State Park near the Humboldt County line. The proposed project extends from post mile (Humboldt) 1.1 to post mile (Humboldt) 2.2 and would include minor realignments and widening of the existing roadway, culvert improvements, and repaving the roadway. This project has been controversial because it involves road improvements and the removal of trees within a State Park as well as concerns regarding growth inducing impacts.”

**Comment B1-10:** The comment corrects a missing number in a reference to a year in a sentence regarding scheduled passenger flights.



**Response to Comment B1-10:** To correct a missing number in a sentence regarding scheduled passenger flights, the first paragraph from the bottom of Page 3.5-10 of the RDEIR is revised as follows:

“Air travel is a growing transportation option in Humboldt County with passenger enplanements at California Redwood Coast – Humboldt County, the only airport in the County with scheduled passenger flights, and passenger enplanements are expected to increase from 98,453 in 2004 to 167,000 in 2024 (Arcata-Eureka Airport Master Plan Report, Chapter 2, Airport Role and Activity Forecasts). Several daily flights are provided, connecting Humboldt County with San Francisco and Portland, Oregon. The airport continues to work to add more flights to more destinations.”

**Comment B1-11:** The comment suggests a clarification for a confusing sentence regarding annual maintenance dredging of Humboldt Bay.

**Response to Comment B1-11:** To clarify the description of annual maintenance dredging of Humboldt Bay, the third from the last paragraph from the bottom of Page 3.5-11 of the RDEIR is revised as follows:

Annual maintenance dredging of Humboldt Bay is vital to maintaining safe and navigable access. Federal channels in Humboldt Bay are dredged by the U.S. Army Corps of Engineers. Any other area that requires dredging is the responsibility of local governments; in this area ~~that is the Harbor District~~ is that agency.

**Comment B1-12:** The comment recommends that a sentence in the environmental baseline section under road safety describing an effect of implementing the General Plan Update be moved to the impact analysis section.

**Response to Comment B1-12:** To address the misplaced statement, the third from the last paragraph from the bottom of Page 3.5-12 of the RDEIR is revised as follows:

“The operation of agricultural vehicles on roadways may also affect traffic on rural roadways in the unincorporated area. Agricultural activities are an important element of the local economy and agricultural vehicles operate regularly on County roadways. Agricultural vehicles are slow moving vehicles and considered incompatible with other motorists. ~~Implementation of the proposed General Plan Update would~~ increases in the amount of traffic on roadways and could increase the potential for conflict with agricultural vehicles.”

**Comment B1-13:** The comment recommends that a misplaced capital letter and a sentence be clarified and asks that a reference to persons between the ages of 5 and 24 be clarified.

**Response to Comment B1-13:** In researching the source of the reference, the web address was found to have been changed. To address the misplaced statement and correct the website reference, the second from the last paragraph from the bottom of Page 3.5-12 of the RDEIR is revised as follows:

“Another factor that can impact roadway safety is the incompatibility of some unincorporated area roadway and highway facilities with multi-modal transportation uses. Many existing roadways and intersections in the County do not contain pedestrian or bicycle facilities. Humboldt County Transportation-

Disadvantaged Populations Report, 2006," (<http://www.naturalresourceservices.org/TDP.html> [http://www.nrsrcaa.org/path/pdfs/HumCoTDPReport5\\_06.pdf](http://www.nrsrcaa.org/path/pdfs/HumCoTDPReport5_06.pdf)) found that pedestrian and bicycle safety is generally poor in Humboldt County when compared to other rural counties. There are substantially higher bicycle injuries and fatality rates in Humboldt County than all other rural areas in California. Bicycle injury and fatality rates are also significantly higher than the state average, particularly for youth and the ages ~~05 five to~~ 24 age groups. In spite of this, bicycle and pedestrian injuries and fatalities are decreasing in Humboldt County."

**Comment B1-14:** The comment recommends that a misplaced capital letter be corrected.

**Response to Comment B1-14:** To address the misplaced statement, the second from the last paragraph on Page 3.5-13 of the RDEIR is revised as follows:

"The traffic impacts resulting from General Plan Update land uses were evaluated by TJKM Transportation Consultants using the latest Humboldt County Travel Demand Model. The Humboldt County Travel Demand Model was updated in 2013 by the Humboldt County Association of Governments (HCAOG) and the California Department of Transportation (Caltrans) to forecast travel patterns in both rural and urbanized portions of Humboldt County. The main purposes of the Humboldt County Travel Demand Model are to support the ~~r~~Regional transportation planning process<sup>1</sup>, to evaluate potential improvements to the roadway system, and evaluate the impacts of land use changes in the County. The model also includes limited transit and non-motorized analysis capabilities. The base year for the model is 2010, with a forecast year of 2040."

**Comment B1-15:** The comment suggests that the phrase "volume to capacity" be revised to add hyphens.

**Response to Comment B1-15:** Although adding hyphens may be correct grammar, this phrase is in common usage with and without hyphens and the Transportation Research Board's Highway Capacity Manual, an authoritative source for methodologies used to calculate ratios of volume to capacity for transportation facilities, does not use hyphens in this phrase. Therefore, no further response is required under CEQA.

**Comment B1-16:** The comment suggests that the description of transportation analysis zones is confusing.

**Response to Comment B1-16:** To address this possible confusion, the second from the second sentence below the heading "2010 Scenario" Page 3.5-14 of the RDEIR is revised as follows:

"The transportation analysis zones cover the entire County and each city, and include contain data representing existing and projected future population and employment levels."

**Comment B1-17:** The comment suggests that the phrase "worse-case" should be corrected to read "worst-case." The comment also suggests that the phrase "18 year" be corrected to add a hyphen.

**Response to Comment B1-17:** To correct this grammar error, the second to last sentence in the last paragraph on Page 3.5-14 of the RDEIR is revised as follows:

“Consequently, an interim year (2028) scenario was developed using the 2028 population from the DOF and 2028 employment from Caltrans 2015 Economics Forecasts, and analyzed as a worst-case scenario.”

To correct the hyphen, the first sentence in the first paragraph on Page 3.5-15 of the RDEIR is revised as follows:

“As shown, the forecast 18-year and 30-year growth in both households and employment is relatively modest.”

**Comment B1-18:** The comment recommends that repeated words in a sentence be deleted.

**Response to Comment B1-18:** To correct this grammar, the first sentence in the second paragraph on Page 3.5-18 of the RDEIR is revised as follows:

“There are no ~~are no~~ adopted plans, ordinances or policies establishing measures of effectiveness for the performance of the circulation system in Humboldt County.”

**Comment B1-19:** The comment recommends that a policy from the Eureka Community Plan be placed in quotes.

**Response to Comment B1-19:** To ensure that the reader knows that this policy is quoted verbatim, the second sentence in the second paragraph on Page 3.5-19 of the RDEIR is revised to add quotes as follows:

“The Eureka Community Plan contains a general goal that does not include an MOE: Policy 4220.1, ‘the County shall strive to maintain a Level of Service of C or better on arterials in the Planning Area. The acceptable level of service goal will be consistent with the financial resources available and the limits of technical feasibility.’”

**Comment B1-20:** The comment suggests that the wording of a sentence relating to a goal of the General Plan Update to reduce vehicle miles traveled should be revised for clarity.

**Response to Comment B1-20:** To clarify the reference to Circulation Element goals, the second sentence in the third to last paragraph on Page 3.5-19 of the RDEIR is revised as follows:

“Due to already established auto-oriented land use patterns, the private automobile would likely continue to be the dominant mode of transport in Humboldt County. The General Plan Update seeks to reduce vehicle miles traveled per person by considering the needs of motorized vehicles, public transit, bicyclists, and pedestrians during land use and transportation planning and by providing balanced transportation opportunities, ~~whereby the needs of motorized vehicles, public transit, bicyclists, and pedestrians are considered during land use and transportation planning.~~”

**Comment B1-21:** The comment points out that Policy C-P2, Consideration of Land Uses in Transportation Decision Making, is mischaracterized and states that it directs the County to decide on transportation projects based on existing and planned future developments.

**Response to Comment B1-21:** To correct the description of Policy C-P2, the second sentence in the first paragraph on Page 3.5-20 of the RDEIR is revised as follows:

"Policy C-P2, Consideration of Land Uses in Transportation Decision Making, ~~notes~~ requires that a comprehensive planning approach be ~~utilized~~ used in transportation decision making, that considers ~~the transportation consequences of land use changes to avoid operational and economic impacts existing and proposed land uses.~~"

**Comment B1-22:** The comment states that complicated syntax is used to describe Table 3.5-7 and suggests a revision.

**Response to Comment B1-22:** To improve the description of Table 3.5-7, the first sentence in the third paragraph on Page 3.5-20 of the RDEIR is revised as follows:

"Table 3.5-7 lists only one road in the City of Eureka, that would be affected by the implementation of General Plan Update, and countywide growth expected to occur during the planning period, ~~that~~ which is ~~the responsibility under the jurisdiction~~ of Caltrans and not Humboldt County."

**Comment B1-23:** The comment correctly states that in the description of Policy IS-P7, Mitigation of Cross-jurisdictional Impacts, "affected" should be used rather than "affect" and asks if the County is still relying on Level of Service as a transportation metric, likely relating to the future implementation of Senate Bill 743 substituting vehicle miles traveled for level of service as the metric of transportation impact across the state.

**Response to Comment B1-23:** For a response to the comment relating to the use of LOS rather than VMT, see response to comment C1-1 on page 2-43. To improve the description of Policy IS-P7, Mitigation of Cross-jurisdictional Impacts, the third sentence in the third paragraph on Page 3.5-20 of the RDEIR is revised as follows:

"Community Infrastructure and Services Element Policy IS-P7, Mitigation of Cross-jurisdictional Impacts, directs the County to work with cities to mitigate impacts associated with new development for each affected jurisdiction."

**Comment B1-24:** The comment indicates that in the description of Policy C-P7, Joint Use of Traffic Models, is confusing.

**Response to Comment B1-24:** To improve the description of Policy C-P7, the last sentence in the third paragraph on Page 3.5-20 of the RDEIR is revised as follows:

"Policy C-P7, Joint Use of Traffic Models, encourages the use of area-wide travel demand models in the preparation of the County-Wide Transportation Plan (CWTP) and in evaluating projects with potentially significant transportation impacts ~~to use area-wide travel demand models.~~"

**Comment B1-25:** The comment corrects grammar in the introduction to Mitigation 3.5.3.1.a.

**Response to Comment B1-25:** The following edits area made to correct the grammar in the introduction to Mitigation 3.5.3.1.a,

“Mitigation 3.5.3.1.a. The following policies shall be added to the Circulation Element and would require the implementation of transportation demand management programs with new larger-scale development in the unincorporated area.”

**Comment B1-26:** The comment corrects grammar in Section F(3) of implementation measure C-IMX7, Congestion Relief Planning and Implementation Program, of Mitigation Measure 3.5.3.2.a.

**Response to Comment B1-26:** The following edits are made to clarify C-IMX7, Congestion Relief Planning and Implementation Program of Mitigation Measure 3.5.3.2.a:

“3. Consider widening the ~~curbs roadway/right-of-way~~ to provide additional travel lanes, bike lanes, 2WLT, medians, parking lanes, and sidewalks, all as needed to meet demands.”

**Comment B1-27:** The comment identifies a missing word in policy C-Px. Countywide Traffic Impact Fee Program, of Mitigation Measure 3.5.3.2.a.

**Response to Comment B1-27:** The following edit is made to correct the wording of C-Px. Countywide Traffic Impact Fee Program, of Mitigation Measure 3.5.3.2.a:

“C-Px. Countywide Traffic Impact Fee Program. In coordination with the cities within the County, ~~shall~~ develop and implement a countywide traffic impact fee program that addresses impacts on major roads resulting from development in cities and unincorporated areas. Adopt this fee within one year of the adoption of the General Plan Update. A traffic impact fee is currently being evaluated for the Greater Eureka Area, encompassing the Eureka urbanized area.”

**Comment B1-28:** The comment asks if the conclusion for Impact 3.5.3.2.-1, Unacceptable LOS on U.S. 101 Between S.R. 255 in Arcata and 6th Street in Eureka, using Level of Service as a transportation metric is consistent with Senate Bill 743.

**Response to Comment B1-28:** For a response to the comment relating to the use of LOS rather than VMT, see response to comment C1-1 on page 2-43.

**Comment B1-29:** The comment notes that the words “Traffic Signal” are incorrectly capitalized in the second paragraph of Impact 3.5.3.2-2: Unacceptable LOS on U.S. 101/Broadway, City of Eureka, on page 3.5-25.

**Response to Comment B1-29:** The following edit is made to the third sentence in the second paragraph of Impact 3.5.3.2-2:

“From approximately 800 feet south of the Kmart ~~T~~traffic ~~S~~signal to Washington Street, Broadway has a TWLTL.”

**Comment B1-30:** The comment notes that an end parenthesis is missing in the third paragraph of Impact 3.5.3.2-2: Unacceptable LOS on U.S. 101/Broadway, City of Eureka, on page 3.5-25.

**Response to Comment B1-30:** The following edit is made to the final sentence in the third paragraph of Impact 3.5.3.2-2:

“While limited relief could be achieved through optimized signal timing, changes in traffic patterns occur routinely and signal timing should therefore be modified as necessary to reflect such changes (City of Eureka General Plan Update Mobility Policy Paper (<http://www.eureka2040gpu.com/Links/pdfs/Mobility%20Policy%20Paper%203-23-15.pdf>)).”

**Comment B1-31:** The comment suggests that inappropriate wording is used to describe the conclusion to Impact 3.5.3.2-2: Unacceptable LOS on U.S. 101/Broadway, City of Eureka.

**Response to Comment B1-31:** The following edit is made to the final paragraph of Impact 3.5.3.2-2 on page 3.5-26:

“The traffic model projects that buildout of the General Plan Update, in conjunction with the implementation of city general plans within the County, would result in traffic levels that would reduce the LOS of the U.S. 101 Broadway corridor ~~at or below~~ to LOS “D<sub>7</sub>” or below, which is the General Plan update LOS standard and the LOS concept established by Caltrans for this facility. Therefore, this would be a potentially significant impact.”

**Comment B1-32:** The comment notes that an incorrect reference to another mitigation measure is made in the paragraph below the heading “Level of Significance after Mitigation” of Impact 3.5.3.2-2: Unacceptable LOS on U.S. 101/Broadway, City of Eureka, on page 3.5-26.

**Response to Comment B1-32:** The following edit is made to the Analysis paragraph of Impact 3.5.3.2-2 on page 3.5-26:

“However, with implementation of Mitigation Measure 3.5.3.2.d, impacts related to the future capacity of U.S. 101 would be reduced and LOS D is considered acceptable on U.S. 101.”

**Comment B1-33:** The comment suggests a correction to a poorly worded sentence in the second paragraph of Impact 3.5.3.2.-3: Unacceptable LOS on Main St, Between 7th St and 13th Street, Fortuna on page 3.5-26.

**Response to Comment B1-33:** The following edit is made to the first sentence of the second paragraph of Impact 3.5.3.2.-3 on page 3.5-26:

“Main Street and Fortuna Boulevard (North and South) in Fortuna ~~are~~ were the formerly alignment of U.S. 101, prior to the construction of the freeway along the western edge of the City.

**Comment B1-34:** The comment suggests corrections and clarifications to last two sentences in the second paragraph of Impact 3.5.3.2.-3: Unacceptable LOS on Main St, Between 7th St and 13th Street, Fortuna on page 3.5-26.

**Response to Comment B1-34:** The following edit is made to the last two sentences of the second paragraph of Impact 3.5.3.2.-3 on page 3.5-26

“The City of Fortuna General Plan Draft EIR determined that no additional lanes would be needed in this area, however it states that the 9th Street and Main Street and 12th Street and Main Street intersections will drop to F in 2030, and includes a mitigation measure for a signalized new left-turn lane to east and west approaches to the 9th Street and Main Street intersection. Intersection improvements at 12th and Main are also required. After mitigation, these intersections will drop to D. Fortuna General Plan Policy TC-1.2 says LOS D is acceptable on Main Street.”

**Comment B1-35:** The comment identifies an incorrect section reference at the top of page 3.5-27 in the “Analysis of Relevant General Plan Update Policies” of Impact 3.5.3.2.-3.

**Response to Comment B1-35:** The following edit is made to make the correct the reference Impact 3.5.3.2.-1 at the bottom of page 3.5-26:

“See the discussion of Impact 3.5.3.2.-41 above for a discussion of General Plan Update Circulation Element policies relating to minimum LOS standards and jurisdictional coordination.”

**Comment B1-36:** The comment suggests edits to improve the readability of a sentence in the Conclusion of Impact 3.2.3.2-3.

**Response to Comment B1-36:** The following edit is made to improve the readability of a sentence in the Conclusion of Impact 3.2.3.2:

“Based on the travel demand model, growth projected to occur during General Plan Update planning period in conjunction with the growth in the cities within the County would reduce the LOS of the segments of Main Street in Fortuna, between 7th Street and 13th Street to LOS D. However, any mitigation involving capacity improvements, typically include ~~the addition of~~ travel lanes, and this would mean adding lanes to areas that are largely built out, leaving where there is little available space to create new lanes without taking land from adjacent properties. or degrading the desired downtown amenities in the area. Therefore, this impact would be significant and unavoidable.”

**Comment B1-37:** The comment notes that the words “North Ramps” and “South Ramps” are incorrectly capitalized in the second to last paragraph of Impact 3.5.3.2-4: Unacceptable LOS on Kenmar Road between U.S. 101 NB Ramps and S. Fortuna Blvd, Fortuna, on page 3.5-27.

**Response to Comment B1-37:** The following edit is made to the second to last paragraph of Impact 3.5.3.2-4:

“The Fortuna General Plan EIR identifies the following mitigation programs that will improve the operation of this segment and related intersections: South Fortuna

Boulevard-Ross Hill Road/Kenmar Road - implement right-turn overlap phasing on both Kenmar Road approaches; Kenmar Road/Eel River Drive – the northbound Eel River Drive approach will need to be widened to provide a right-turn lane; Kenmar Road/U.S. 101 North Ramps – signalize and operate with permitted left-turn phasing (no additional lanes would be needed); Kenmar Road/U.S. 101 South Ramps – signalize, add a right-turn lane on the eastbound approach and operate with permitted left-turn phasing. Upon implementation of these improvements this segments and associated intersections would operate at LOS “C” or better.”

**Comment B1-38:** The comment identifies an incorrect section reference is made at the bottom of page 3.5-27 in the “Analysis of Relevant General Plan Update Policies” of Impact 3.5.3.2-4.

**Response to Comment B1-38:** The following edit is made to correct the reference to Impact 3.5.3.2-4 at the bottom of page 3.5-27:

“See the discussion of Impact 3.5.3.2-4 -1 above for a discussion of General Plan Update Circulation Element policies relating to minimum LOS standards and jurisdictional coordination. In particular, the General Plan Update Circulation Element includes the following policy relating to minimum LOS standards, C-P5, Level of Service Criteria, which strives to maintain a LOS “C” on all roadway segments, except for any portion of U.S. 101, where Level of Service D would be acceptable. See Impact 3.5.3.4-~~1~~ -1 above, for a discussion of how Policies C-P6 Jurisdictional Coordination and Integration, and C-P7 Joint Use of Traffic Model, lessen potential impacts.”

**Comment B1-39:** The comment notes that the word “Conflict” is incorrectly capitalized in the first paragraph of Impact 3.5.3.3 Regional Level of Service Standard, on page 3.5-28.

**Response to Comment B1-39:** The following edit is made to the first paragraph of Impact 3.5.3.3:

“Implementation of the General Plan Update would generate levels of development that result in increased traffic volumes on roads within the County that could ~~C~~conflict with an applicable regional level of service standard.”

**Comment B1-40:** The comment identifies an incorrect reference to Appendix G of the CEQA Guidelines in the middle of page 3.5-28 of Impact 3.5.3.3 Regional Level of Service Standard.

**Response to Comment B1-40:** The following edit is made to make the correct Appendix G to the CEQA Guidelines reference in Impact 3.5.3.3 in the middle of page 3.5-28:

“~~e)b)~~ Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.”

**Comment B1-41:** The comment suggests that an additional reference should be made in the discussion of “Mitigation” in Impact 3.5.3.3 Regional Level of Service Standard to



identify the new implementation measure number that is added by Mitigation Measure 3.5.3.2.a, which addresses this impact topic.

**Response to Comment B1-41:** The reference in the mitigation discussion in Impact 3.5.3.3 clearly identifies Mitigation Measure 3.5.3.2.a, which contains new implementation measure C-IMX7. No changes to the RDEIR are required.

**Comment B1-42:** The comment suggests that a reference should be made to the Hoopa Airport in the third paragraph under Impact 3.5.3.4: Air Traffic.

**Response to Comment B1-42:** The sentence states that “The Humboldt County Airport Land Use Commission has established airport land use compatibility plans for each airport, except Samoa Field.” The 1993 Airport Land Use Compatibility Plan, Humboldt County Airports states in the section titled “Function and Authority” on page 1-1 that “(t)he (Airport Land Use Compatibility Plan, Humboldt County Airports) pertains to the land uses surrounding the following airports” and specifically lists Hoopa Airport but does not list Samoa Field. Therefore, the statement that the Airport Land Use Compatibility Plan, Humboldt County Airports establishes airport land use compatibility plans for Hoopa Airport and not Samoa is correct. No changes to the RDEIR are required.

**Comment B1-43:** The comment suggests edits to improve the readability of a sentence in the first full paragraph of Impact 3.5.3.4: Air Traffic on page 3.5-31.

**Response to Comment B1-43:** The following edit is made to improve the readability of the first sentence of the last paragraph on page 3.5-30 under Impact 3.5.3.4: Air Traffic:

“The Arcata-Eureka Airport Master Plan Report (September 2005) for the California Redwood Coast – Humboldt County Airport contains forecasts of future airport operations forecasts.”

**Comment B1-44:** The comment suggests two edits to correct a reference to the Regional Transportation Plan and to improve the readability of a sentence in the last paragraph under Impact 3.5.3.4: Air Traffic at the top of page 3.5-31.

**Response to Comment B1-44:** The following edit is made to the first paragraph on page 3.5-31 under Impact 3.5.3.4: Air Traffic:

“Aircraft operations at the Dinsmore, Garberville, Murray Field, and Rohnerville airports are expected to increase by between 15 and 18 percent between 2010 and 2025 according to Table AS3 Aviation Activity Forecast – Annual Operations, of the Regional Transportation Plan Aviation Systems Element. Samoa Field, Hoopa Airport, and Shelter Cove Airport are not anticipated to experience increases in aircraft operations in the next 20 years. The airport master plans identify the improvements, if any, that may be required to accommodate future aircraft operations.”

**Comment B1-45:** The comment suggests a grammar edit to the last sentence in the first paragraph under “Analysis of Relevant General Plan Update Policies” of Impact 3.5.3.5: Road Safety on page 3.5-32.

**Response to Comment B1-45:** The following edit is made to the above referenced sentence of Impact 3.5.3.5: Road Safety on page 3.5-32:

“... The Circulation Element contains policies to ensure that roadway design reduces roadway safety hazards and accommodates multi-modal users.”

**Comment B1-46:** The comment suggests a grammar edit to the first sentence of the second paragraph under “Analysis of Relevant General Plan Update Policies” of Impact 3.5.3.5: Road Safety on page 3.5-32.

**Response to Comment B1-46:** The following edit is made to the above referenced sentence of Impact 3.5.3.5: Road Safety on page 3.5-32:

“The Circulation Element includes policies and standards that ~~the~~ relate to safe circulation facilities for all transportation modes...”

**C. PUBLIC AND PUBLIC INTEREST GROUP COMMENTS**

## Letter C1 Coalition for Responsible Transportation Priorities



May 29, 2017

John Miller  
 County of Humboldt  
 Planning and Building Department  
 3015 H Street  
 Eureka, CA 95501  
 via email: [gpu@co.humboldt.ca.us](mailto:gpu@co.humboldt.ca.us)  
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**RE: Comments on Proposed Revised Draft Environmental Impact Report (RDEIR) for Draft Humboldt County General Plan**

Mr. Miller:

The Coalition for Responsible Transportation Priorities (CRTP) is an organization whose mission is to promote transportation solutions that protect and support a healthy environment, healthy people, healthy communities and a healthy economy on the North Coast of California. CRTP appreciates the opportunity to comment on the proposed Revised Draft Environmental Impact Report (RDEIR) for the County's General Plan Update (GPU). Our comments are as follows:

*Level of Service & Vehicle Miles Traveled*

The use of vehicular Level of Service (LOS) as a primary tool for assessing transportation impacts of the GPU leads is extremely problematic. LOS is an outdated metric which is increasingly recognized as leading to unintended consequences when used to measure the impacts of development and to determine appropriate mitigation. One researcher succinctly summarizes: "The use of LOS is often criticized for its bias towards automobiles at the expense of bicycling, transit, and walking, and it complicates smart growth or compact development."<sup>1</sup> We agree with this criticism.

Furthermore, the use of LOS and other measures of automobile congestion to assess transportation impacts leads to mitigation measures which add automobile capacity to the road system. This tendency can be seen in the list of circulation system improvements in Table 3.5-6 of the RDEIR, which consists of additional roadway construction projects meant to relieve congestion. However, there is a growing consensus in transportation planning that adding capacity induces new travel and does not reduce congestion. We highly recommend that the

<sup>1</sup> Henderson, Jason. 2011. "Level of service: the politics of reconfiguring urban streets in San Francisco, CA." *Journal of Transport Geography* 19(6): 1138-1144.

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C1-1



literature on induced travel be carefully reviewed and considered. A recent policy brief for the National Center for Sustainable Transportation, appropriately titled “Increasing Highway Capacity Unlikely to Relieve Traffic Congestion,” contains a concise summary.<sup>2</sup>

The fact that the RDEIR considers “unacceptable LOS on roadways in the County” (Impact 3.5.3.2) to be a potentially significant impact of the GPU leads to counterproductive and internally inconsistent mitigation measures. Other than some Transportation Demand Management (TDM) strategies which the RDEIR itself admits would be difficult to implement effectively (p.3.5-21), these mitigation measures are designed to decrease congestion—i.e., increase speed of travel—by adding capacity, and will therefore induce additional vehicle miles traveled (VMT). This is an inevitable result of any project which decreases congestion by adding capacity, because the increased speed of travel resulting from such projects is what actually induces additional VMT.<sup>3</sup> Meanwhile, increased VMT is considered a significant and unavoidable impact of the GPU. This internal inconsistency within the RDEIR should be addressed by replacing LOS with VMT as the primary vehicular impact measure.

C1-1

The RDEIR shows that Humboldt County already has a high VMT per capita and that the GPU will exacerbate this problem. Tables 3.5-4a and 3.5-4b project VMT to increase at nearly twice the rate of population increase through 2040, and at nearly three times the rate in the near term (through 2028). At p.3.5-19, the RDEIR attributes not only current high VMT but future disproportionate VMT growth to “already established auto-oriented land use patterns.” However, this defies common sense. Existing land use patterns influence but do not dictate the pattern of future development—that is in large part the purpose of the GPU. Similarly, there is no fixed correlation between “levels of development” and VMT, as implied on p.3.5-19 of the RDEIR. Rather, it is the type and pattern of development which determines the impacts on VMT.

C1-2

In this case, a review of the GPU’s proposed land use maps and circulation system improvements make it clear that increased VMT will be the result of growth planned largely for the outskirts of population centers—in other words, sprawl. But instead of proposing to mitigate increased VMT by modifying the land use planning in the GPU which causes it, the only proposed mitigation measure which even mentions land use limits itself to the consideration of

<sup>2</sup> Handy, Susan. October 2015. “Increasing Highway Capacity Unlikely to Relieve Traffic Congestion.” National Center for Sustainable Transportation. Available online at [http://www.dot.ca.gov/newtech/researchreports/reports/2015/10-12-2015-NCST\\_Brief\\_InducedTravel\\_CS6\\_v3.pdf](http://www.dot.ca.gov/newtech/researchreports/reports/2015/10-12-2015-NCST_Brief_InducedTravel_CS6_v3.pdf).

<sup>3</sup> Cervero, Robert. 2003. “Road Expansion, Urban Growth, and Induced Travel: A Path Analysis.” *Journal of the American Planning Association* 69(2): 145-163.



*future* land use decision making. In other words, the RDEIR adopts an aspirational and largely unenforceable mitigation measure in place of a concrete and meaningful one.

Additionally, Proposed GPU Policy C-P5, establishing a minimum LOS for county roadways, is likely to ensure additional capacity increases and thus VMT increases for the life of the General Plan. An effective mitigation measure for increased VMT would be removal of Policy C-P5.

VMT is used as a “measure of congestion” in the RDEIR (p.3.5-20) and the discussion of VMT impacts beginning at p.3.5-18 is largely limited to congestion, but it is a much more meaningful indicator than that. The California Governor’s Office of Planning and Research (OPR) is currently in the process of implementing SB 743 (2013) by replacing LOS in the CEQA Guidelines with VMT. As OPR notes in its latest proposal, “vehicle miles traveled directly relates to emissions of air pollutants, including greenhouse gases, energy usage, and demand on infrastructure, as well as indirectly to many other impacts including public health, water usage, water quality and land consumption.”<sup>4</sup> While the amendments to the CEQA Guidelines are not yet in effect, the current draft and supporting analysis are instructive, and it would behoove the RDEIR to follow the draft to the greatest extent possible.

C1-2

In sum, the RDEIR should shift its focus away from LOS impacts. Further, the conclusion that increased VMT is an unavoidable impact of the GPU is not supportable. Reasonable mitigation measures which modify the GPU’s proposed policies, land use maps and circulation improvements while still accommodating population growth and achieving the GPU’s other goals could effectively mitigate VMT increases and must be adopted, as opposed to the speculative and unenforceable mitigation measures currently proposed.

#### *Active Transportation & Transit*

In summarizing the benefits and costs of different transportation modes, the RDEIR lists only “travel time, effort, convenience, and expense” (p.3.5-1), leaving out such critical considerations as safety, health, and greenhouse gas (GHG) emissions. It is thus perhaps unsurprising—but nevertheless unacceptable—that modes which may take more time but which promote greater health and safety and lower GHG emissions such as walking, bicycling and transit are given substantially less serious consideration than automobiles in the RDEIR. For example, the list of “issues affecting the County road system” (p.3.5-2) does not include anything about the capacity, safety or effectiveness of the road system for non-vehicular users. This is despite the fact that the document discusses in some detail how deficient the County’s

C1-3

<sup>4</sup> Governor’s Office of Planning and Research. January 2016. Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA. Available online at [https://www.opr.ca.gov/docs/Revised\\_VMT\\_CEQA\\_Guidelines\\_Proposal\\_January\\_20\\_2016.pdf](https://www.opr.ca.gov/docs/Revised_VMT_CEQA_Guidelines_Proposal_January_20_2016.pdf).



current bicycle and pedestrian infrastructure is, and the County's high rate of serious accidents involving bicyclists and pedestrians is also separately identified and discussed (p.3.5-12).

Furthermore, while vehicular travel impacts are extensively and quantitatively measured and discussed, and the GPU's proposed Policy C-P25 directs the County to adopt objective bicycle and pedestrian LOS/Quality of Services standards for County roads, the RDEIR makes no attempt to use any such standards to identify or measure the GPU's impacts on active transportation.

Without such objective measures, it is unclear how the RDEIR can come to conclusions such as that the GPU would increase walking and bicycling trips (p.3.5-31). It is important to note, however, that since the RDEIR *does* show that the GPU will result in increased vehicular trips regardless of whether bicycle and pedestrian trips will increase, the "hazards to roadway users" identified at this point in the RDEIR are real. Vehicles are the primary type of roadway users which pose a safety hazard.

In fact, the increase in vehicle trips and VMT creates a serious risk of decreased safety for all roadway users and a significant impact under CEQA. The RDEIR concludes on p.3.5-33 that safety impacts would be less than significant on the basis of the GPU's proposed goals and policies to promote safe multimodal transportation and encourage better design for bicycle, pedestrian and transit infrastructure. However, these aspirational policies do not outweigh the safety threat of additional VMT. Furthermore, the GPU's prioritization of the convenience of vehicular road users over the safety of non-vehicular road users is made clear by the use of the vague and permissive words "should" and "if possible" in proposed Policy C-P5, which states that road improvements to address congestion "should not adversely affect Level of Service and/or Quality of Service for other modes of transportation, if possible." This analysis applies equally to the RDEIR's conclusion that impacts to the performance or safety of bicycle, transit and pedestrian facilities will be less than significant.

In sum, the RDEIR must provide greater attention and analysis to non-vehicular transportation impacts. Furthermore, conclusions that the roadway safety and multimodal safety and performance impacts of the GPU are less than significant are not supportable and must be revisited.

#### *Outdated Analysis and Trucking Impacts*

The GPU process has taken many years, and we understand the difficulty of keeping the analyses in the RDEIR up to date. Nevertheless, it is not acceptable for the RDEIR to rely on documents and analyses which are substantially outdated and reflect conditions which no longer prevail. For example, the RDEIR explicitly relies on a reports from 2002 and 2008 to describe "existing transportation system conditions" (p.3.5-1). At p.3.5-5, the RDEIR also relies

C1-3

C1-4



on the County's 2008 Regional Transportation Plan (RTP) for a list of "regionally significant streets and roadways," despite the fact that the RTP was completely overhauled in 2014. Characterizing current conditions based on documents which are 15 years old and 9 years old, respectively, and categorically out of date, simply cannot lead to supportable impact assessment.

One glaring example of outdated analysis is the claim that Humboldt County is "dependent on logging and heavy commercial truck traffic to sustain its economy" (p.3.5-5). While logging and truck transportation still play a role in the local economy, the County can no longer be said to depend on them. The most recent Census data (2015) show that the entire forestry & agriculture sector provides only 2.3% of the County's payroll and 1.6% of its employment. Even adding this sector to manufacturing, wholesale, transportation and warehousing—the other main industries dependent on heavy trucks—produces only 16% of the payroll and 13% of the employment.

The RDEIR recognizes that "a key concern for the County is the impact of heavy truckloads on deteriorating County roads" (p.3.5-9), but provides no analysis of the GPU's impact on truck traffic or County road maintenance and repair. Indeed, the word "truck" appears only once in the entire Section 3.5.3 on transportation impacts and mitigation measures, and there is no discussion at all of the GPU's impacts on efforts to maintain and repair County roads. This lack may be partly explained by the incorrect assumption that the County is still heavily dependent on industries like logging—and that therefore there is no reasonable way to limit or control heavy truck traffic. Regardless, the RDEIR must be amended to include an analysis of truck traffic and maintenance/repair impacts, along with any needed mitigation.

Thank you for your consideration of our comments.

Sincerely,

Colin Fiske  
Campaign Coordinator  
Coalition for Responsible Transportation Priorities  
colin@transportationpriorities.org

C1-4



## Responses to Coalition of Responsible Transportation Priorities - Letter C1

**Comment C1-1:** This comment asserts the General Plan Update RDEIR's usage of LOS as a primary assessment tool is inappropriate, and that LOS should be replaced with VMT.

**Response to Comment C1-1:** The RDEIR uses both level of service (LOS) and vehicle miles traveled (VMT) as assessment tools. The use of VMT as a travel metric was emphasized by SB 743, which in 2013 was enacted to facilitate/simplify CEQA approvals of infill development projects in urban areas with strong transit services. Specific guidelines to modify CEQA procedures are currently being promulgated by the Office and Planning and Research. OPR's proposed guidelines summarize the intent this way:

"Substantively, a focus on vehicle miles traveled will facilitate the production of badly-needed housing in urban locations. It will also facilitate transit projects and better uses of existing infrastructure as well as bicycle improvements. As a result, people will have better transportation options. It also means that CEQA will no longer mandate roadways that focus on automobiles to the exclusion of every other transportation option. It will no longer mandate excessive, and expensive, roadway capacity."<sup>1</sup>

The degree to which this legislative intent meshes with existing and planned conditions in Humboldt County can be argued. The guidelines clearly target urbanized areas in California and many of its features and recommendations do not seem have application to rural counties. For example, most of the important roadways in Humboldt County have two lanes as their ultimate planned width. The exceptions include some state highways and a few urban arterials. Humboldt County agencies have no plans for massive roadway widening or other capacity-increasing efforts. Table 3.5-6 lists 43 potential circulation system improvements, all two-lane local or collector streets, whose purpose is to enable the roadway system to accommodate the increased travel demand from General Plan Update development without causing unacceptable traffic congestion. In many cases, these are "missing links" in the roadway system whose need will arise as anticipated development projects occur.

Using LOS as a metric, the GPU identifies only four projects with unacceptable future conditions for which mitigation measures are investigated: US 101 north of Eureka, U.S. 101 in Eureka between 6th Street and Herrick Avenue, and sections of Main Street and Kenmar Road in Fortuna. Widening is considered impractical for the Fortuna projects. The two remaining projects recommended by the GPU are safety and operational improvements on the two sections of U.S. 101 in and near Eureka that are not classified as capacity-enhancing projects. It can be seen that the use of LOS instead of VMT has not produced any widening or capacity-enhancing projects in the County.

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<sup>1</sup> Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA, Governor's Office of Planning and Research, January 20, 2016

One important non-CEQA use of LOS in the analysis of new development projects enables the reviewing agencies to ensure that necessary nearby transportation improvements are identified and enacted. A VMT project analysis provides no value in these circumstances.

Because of these issues, it is appropriate for Humboldt County to continue to use both LOS and VMT as transportation assessment tools.

**Comment C1-2:** In support of the concept that VMT is a better indicator to measure transportation impacts, the RDEIR should propose and support measures that mitigate VMT increases described in the text. The Office of Planning and Research proposed guidelines to evaluate transportation impacts should be followed.

**Response to Comment C1-2:** In addition to responses to comment T1-2, it should be noted that the only factors related to increased VMT are; 1) number of vehicular trips, 2) trip length, and 3) induced travel resulting from higher speeds due to improved roadway capacity. The commenter argues that land use patterns should be more compact so that trips would be fewer and shorter. However, with the minimal growth forecasted for the County, there would hardly be the ability to realign existing and future land uses to achieve such a scenario. The earlier response also points out that there are essentially no capacity enhancing projects expected in the County during the life of the GPU, eliminating induced travel as a significant factor. Also, most would argue that "sprawl" is not an applicable description of the consequences of adoption of the Humboldt County GPU.

The references to VMT increasing at a faster rate than population and employment are partly explainable by the lack of precision inherent in estimating both current and future VMT. A variety of approaches and models are possible, all of which rely on assumptions and qualitative assessments.

**Comment C1-3:** The RDEIR should focus on non-vehicular travel including transit, walking and bicycle trips. The document should develop measures to identify or measure impacts on active transportation. Conclusions that roadway safety and multimodal safety and performance impacts of the GPU are less than significant are not supportable.

**Response to Comment C1-3:** The GPU document itself has 22 (out of 78 total) proposed goals and policies, standards and implementation measures that directly relate to active transportation – transit, walking and bicycling. These policies make it clear that the County is intent on promoting active transportation as it reviews development applications and as it develops infrastructure improvement projects. Contrary to the comment, implications that roadway safety and other features related to active transportation create significant impacts are not supported by the comment.

**Comment C1-4:** The RDEIR relies on outdated trucking statistics that do not reflect the County's diminished activities in forestry and agriculture. The impacts of truck traffic should be reanalyzed and appropriate mitigation measures should be developed.

**Response to Comment C1-4:** The commenter seems to make contradictory statements and requests: The description of truck activity in the RDEIR is outdated and overstated but the document should be revised to include an analysis of truck impacts and mitigation measures. The observation that the GPU process has taken many years to analyze possibly accounting for outdated information may be correct. However, to the same extent it may overestimate truck activity, it also overestimates negative truck impacts on the roadway system.

Letter C2 Marissa D’Arpino

PO Box 898  
Blue Lake, CA 95525  
June 9, 2107

County of Humboldt  
Humboldt County Planning and Building Department  
Michael Richardson, Supervising Long Range Planner  
mrichardson@co.humboldt.ca.us

RE: Public Comment on Revised Draft Environmental Impact Report (SCH# 2007012089 dated April 19, 2017)

- 1. What is the real impact of the County negligently not upholding the 1984 version of the Constitution? What will the impact be with this one and all of it supposed mitigations (when the County doesn’t enforce its policies, standards, and implementation measures)? C2-1
- 2. What is the real impact to the draft EIR information and conclusions by using reports and reviews that are old (some written over a decade ago)? C2-2
- 3. What is the real impact when the County is known for its culture of lawlessness (individuals not following the laws and no one filing formal complaints – by the way, where can one find the County’s complaint form and information)? C2-3
- 4. Housing: New Home Construction (p 2-5) – does this include all of the illegal building and illegal subdivisions (and that haven’t been abated and have only increased)? C2-4
- 5. Population Growth: (p 2-6) – does this include the full- and part-time people related to the marijuana industry (that has exploded over the last decade and that will increase with the new Humboldt laws)? C2-5
- 6. How does this GPU’s guiding principles (p 2-14) “preserve and enhance ...and the quality of life,” have a “...balance approach to protect natural resources...,” “...utilize common sense” particularly in the Titlow Hill area where the County has known numerous illegal activities for decades and has yet to abate them (notices of nuisance were sent out for some, but not all and now there are possibly only three families in the area who live there legally and who are not growing marijuana) and where proposed land use / zoning / marijuana growing changes will only allow more negative impact to those families? C2-6
- 7. Where is the Titlow Hill area (p 3.2-17 and 18)? The County did extensive research and reporting in relationship to its lawsuit against Bareilles. County even states that in Schmook and Villa that nothing abated. C2-7
- 8. How were the Redwood Creek housing units calculated (p 3.7-38)? Projected legal housing only? If yes, then the quantity is way too low and there will be no addresses for emergency services, nor accessible roads or driveways. C2-8
- 9. What are the real impacts to air quality (p 3.12-2) where all of the surrounding roads are dirt and there a numerous illegal subdivisions (Titlow Hill area)? C2-9
- 10. How can the County make certain assertions about air quality when it has no monitoring systems in eastern Humboldt (p 3.12-3) where the sky becomes dark and the air crunchy when there are forest fires and everything near dirt roads becomes covered with dust? C2-10
- 11. Why are farming operations, off-road equipment, etc. listed multiple times with different numbers in Table 3.12-3. Annual PM10 emissions estimated percent contribution by source (p 3.12-5)? C2-11
- 12. How can the assumptions about the daily activity on unpaved roads be true (p 3.12-6) when areas where there are marijuana growing (activities go through fall, increase when their trimmers come, and all of them go back and forth / back and forth along the roads multiple times a day and night)? C2-12
- 13. What does the County think about having odors (especially marijuana) for visitors and legal residents (p 3.12-7)? What is the cost to property owners if they are surrounded for miles by marijuana growers/processors? What is the negative impact on their property rights and ability to enjoy their own C2-13

properties (especially when the problems did not exist when their properties were purchased)? The County also claims that it has “unknown” odor causing sites (p 3.12-16), but they are well aware of thousands of marijuana growing and production sites.

C2-13

14. How does “Reduce Length and Frequency of Vehicle Trips,” (p 3.13.-19 ) happen when the County is proposing to increase the quantity of parcels, number of businesses, etc. in unincorporated areas (and farther from the coast)? Here and elsewhere, where is the County going to come up with the money to implement and support these activities (the County already says that they don’t have resources for the current laws on the books)?

C2-14

15. What laws does the County have or propose to mitigate light pollution that can be seen for miles and negatively impact a person’s ability to enjoy the night sky and negatively impact wildlife (p 3.16-4)? Just in the last year, there are several new and large greenhouses just in the Titlow Hill area.

C2-15

There are over a hundred more pages to read and review (out of the 582 total), so I’m going to let my general statements at the beginning of this public comment stand for the rest of the pages. It would be meaningful to understand how many public comments (separated by general public, government agencies, legal entities, real estate/development businesses, etc.) continue to be participate in this process since it has be going on for over a decade (and how this compares to other counties).

C2-16

Sincerely,

Marisa D’Arpino

## Responses to Marisa D'Arpino - Letter C2

**Comment C2-1:** The comment questions the “real impact” of not adhering to the current General Plan and what the impact would be if the County doesn’t enforce the General Plan Update policies, standards, and implementation measures in the future.

**Response to Comment C2-1:** This comment expresses an opinion about the implementation of the current Humboldt County General Plan, a baseline condition, and speculates that the implementation of the proposed General Plan Update will not occur. The comment does not address specific impacts or mitigation measures in the RDEIR. Therefore, no further response is required under CEQA.

**Comment C2-2:** The comment questions what the “real impact” is of the RDEIR relying on background reports that, in some cases, are over ten years old.

**Response to Comment C2-2:** The comment does not identify specific background reports of concern or impacts or mitigation measures that may be affected by such information. Section 3.0, Baseline Environmental Conditions Assumed in the RDEIR, describes the environmental setting information contained in the RDEIR. In addition, the Environmental and Regulatory Setting of each impact topic in the RDEIR describes the specific environmental setting information relied upon in that section of the RDEIR and the information that has been updated since release of the Notice of Preparation on January 22, 2007, or the Draft Environmental Impact Report, April 2, 2012. The comment does not address specific impacts or mitigation measures in the RDEIR. Therefore, no further response is required under CEQA.

**Comment C2-3:** The comment questions the “real impact” of “individuals not following the laws.”

**Response to Comment C2-3:** The RDEIR discusses the following illegal or unpermitted activities in the description of the environmental baseline and analysis portions of the following RDEIR Chapters: cannabis cultivation, grading, land division (Chapter 3.2, Agricultural and Timber Resources); stream diversions, dumpsites (Chapter 3.3, Utilities and Services Systems); accidental spills and illegal disposal of hazardous waste (Chapter 3.7, Hazards and Hazardous Materials); water diversions (Chapter 3.10, Hydrology and Water Quality); water diversions, homeless encampments, trash dumping, and illegal filling (Chapter 3.11, Biological Resources); PM10 emissions and the extent to which this may be attributable to travel to and from remote unpermitted illegal cannabis cultivation sites (Chapter 3.12, Air Quality); illegal billboards (Chapter 3.16, Scenic Resources). The RDEIR is intended to disclose the possible environmental impacts from approving the policies, standards, and implementation measures in the General Plan Update and the population growth that is projected to occur during the General Plan Update planning period. The comment does not address specific impacts or mitigation measures in the RDEIR. Therefore, no further response is required under CEQA.

**Comment C2-4:** The comment asks if Table 2.1-4, Humboldt County Changes in Housing Units 1995-2015, includes "all of the illegal building and illegal subdivisions (and that haven't been abated and have only increased)."

**Response to Comment C2-4:** Table 2.1-4 contains data from the State Department of Finance that is benchmarked to the US Census. Humboldt County cannot verify whether or not Census data may include some or all housing units that were constructed without building permits. The comment does not address specific impacts or mitigation measures in the RDEIR. Therefore, no further response is required under CEQA.

**Comment C2-5:** The comment asks if Table 2.1-5, Humboldt County Population Growth Forecasts, includes "the full- and part-time people related to the marijuana industry."

**Response to Comment C2-5:** Table 2.1-5 includes data from the State Department of Finance that is benchmarked to the US Census. Humboldt County cannot verify whether or not Census and Department of Finance estimates include some or all "the full- and part-time people related to the marijuana industry." The comment does not address specific impacts or mitigation measures in the RDEIR. Therefore, no further response is required under CEQA.

**Comment C2-6:** The comment asks about the effect of the General Plan Update Guiding Principles to "preserve and enhance ...and the quality of life," have a "...balance approach to protect natural resources..." " ...utilize common sense," particularly in relation to the Titlow Hill area.

**Response to Comment C2-6:** According to Section 1.4 of the General Plan Update, the Guiding Principles "provide a statement of community values and of the overall objectives of the General Plan" and "have been used to guide the drafting of the goals and policies in each plan element, to create a vision for the future, and to serve as the basis for evaluating future amendments." The RDEIR is intended to disclose the possible environmental impacts from approving the policies, standards, and implementation measures in the General Plan Update and the population growth that is projected to occur during the General Plan Update planning period. The comment does not address specific impacts or mitigation measures in the RDEIR. Therefore, no further response is required under CEQA.

**Comment C2-7:** The comment appears to ask how the Titlow Hill area "in relationship to its lawsuit against Bareilles" is addressed in the discussion of the trends relating to the increased monetary valuation of resource lands for rural residential purposes rather than resource production uses of the Agricultural and Timber Resources – Environmental and Regulatory Setting, found on pages 3.2-17 and 18 of Chapter 3.2, Agricultural and Timber Resources.

**Response to Comment C2-7:** Humboldt County Planning and Building recently issued a request for proposals to prepare an environmental impact report for Titlow Hill General Plan Amendment, Zone Reclassification, and Subdivision Application. The concerns addressed by the commenter would be best addressed in the environmental review of

that project. The comment does not address specific impacts or mitigation measures in the RDEIR. Therefore, no further response is required under CEQA.

**Comment C2-8:** The comment asks how the Redwood Creek housing units were calculated in Table 3.7-6. Housing Units Projected within High Fire Hazard Severity Areas.

**Response to Comment C2-8:** The methodology used to distribute the 1,721 dwelling units projected to be developed within the unincorporated area during the planning period can be found in Appendix T - Assumptions Used in the Development Projections. The comment does not address specific impacts or mitigation measures in the RDEIR. Therefore, no further response is required under CEQA.

**Comment C2-9:** The comment asks about the “real impacts” to air quality of dirt roads that are related to illegal subdivisions in the Titlow Hill area in particular.

**Response to Comment C2-9:** The discussion of “Criteria Air Pollutants” beginning on page 3.12-4 and Table 3.12-3, Annual PM10 emissions estimated percent contribution by source, discloses the annual PM10 emissions estimated percent contribution from unpaved road dust. Page 3.12-9 of Chapter 3.12, states that “Air Quality Attainment Plan or the General Plan Update policies, standards, or implementation measures. The potential impact of permitting cannabis cultivation sites in remote areas accessed by unpaved roads will be examined in a separate EIR to be prepared prior to the adoption of future land use ordinances for permitting cannabis activities authorized by the Medical Cannabis Regulation and Safety Act (Bus. & Prof. Code § 19300, et. seq., etc.) or the Adult Use of Marijuana Act (Prop. 64 (2016); Bus. & Prof. Code § 26000, et. seq., etc.” The comment does identify specific additional impacts or mitigation measures in the RDEIR. Therefore, no further response is required under CEQA.

**Comment C2-10:** The comment asks how assertions about air quality, in particular those impacts relating wildland fire and dirt roads, can be made without air quality monitoring stations in eastern Humboldt County.

**Response to Comment C2-10:** All air quality data in the RDEIR is from the California Air Resources Board. Impact 3.12.4.1, Conflict with Air Quality Plan, Violate Air Quality Standard, Increase Criteria Pollutant in Non-Attainment Status, discloses impacts relating to criteria pollutants such as unpaved road dust and concludes that “(b)ecause the County is in nonattainment status for PM10, increases in PM10 emissions that could increase exceedances are significant. Implementation of the proposed General Plan Update would result in a cumulatively considerable net increase in PM10 emissions. Although applying the General Plan Update policies and standards would reduce impacts that might otherwise be greater, the impacts remain significant and unavoidable.” The comment does identify specific additional impacts or mitigation measures in the RDEIR. Therefore, no further response is required under CEQA.

**Comment C2-11:** The comment asks why farming operations and off-road equipment, etc. are listed multiple times with different numbers in Table 3.12-3, Annual PM10 emissions estimated percent contribution by source.



**Response to Comment C2-11:** These data are compiled by the California Air Resources and presented in this format. Off-road vehicles are likely used for other activities in addition to farming operations. The comment does not address specific impacts or mitigation measures in the RDEIR. Therefore, no further response is required under CEQA.

**Comment C2-12:** The comment questions the validity of assumptions regarding the use of unpaved roads, especially relating to marijuana operations.

**Response to Comment C2-12:** Environmental effects relating to PM10 (road dust) are addressed in Impact 3.12.4.1, Conflict with Air Quality Plan, Violate Air Quality Standard, Increase Criteria Pollutant in Non-Attainment Status. See response to comment C-1-9 and C-1-10 for a discussion of the RDEIR conclusions regarding PM10. The comment does not address specific impacts or mitigation measures in the RDEIR. Therefore, no further response is required under CEQA.

**Comment C2-13:** The comment expresses concerns about existing sources of objectionable odors, especially relating to marijuana cultivation and refers to a statement on page 3.12-16 about “unknown odor causing sites.”

**Response to Comment C2-13:** Existing sources of odors within the unincorporated area are described on page 3.12-7 under the headings “Odors” and “Sensitive Receptors.” The RDEIR analyzes potential new sources of objectionable odors in Impact 3.12.4.3, Objectionable Odors, and states on page 3.12-16 that “It is unknown at this point what types and locations of specific establishments could be developed under implementation of the Draft General Plan, and it is possible that some uses (e.g., wastewater treatment plants) could have the potential to produce odors.” The comment does not address specific impacts or mitigation measures in the RDEIR. Therefore, no further response is required under CEQA.

**Comment C2-14:** The comment questions how General Plan Update Policy AQ-P1, Reduce Length and Frequency of Vehicle Trips, will be accomplished “when the County is proposing to increase the quantity of parcels, number of businesses, etc. in unincorporated areas.”

**Response to Comment C2-14:** The analysis in “Land Use and Circulation Elements” on page 3.13-21 is related to this question and states that “(n)onetheless, as described above, the project will generate increased daily vehicle trips at buildout.” The RDEIR concludes that the proposed General Plan update would exceed an adopted Greenhouse Gas significance threshold. The comment does not address specific impacts or mitigation measures in the RDEIR. Therefore, no further response is required under CEQA.

**Comment C2-15:** The comment asks how light pollution is proposed to be mitigated, in particular impacts relating to existing greenhouses with lights.

**Response to Comment C2-15:** Impact 3.16.3.3, Sources of Light and Glare, analyzes whether implementation of the General Plan Update could result in increased development that would be new sources of light that could affect day or nighttime

views. The RDEIR concludes that light and glare impacts from increased development are potentially significant and incorporates a Mitigation 3.16.3.3.a, which would add a new program to the Scenic Resources Chapter of the Conservation and Open Space Element to amend the Zoning Regulations to include lighting design guidelines for discretionary projects. Humboldt County Planning and Building Department issued a Notice of Preparation of a Draft Environmental Impact Report on April 4, 2017, for Amendments to Humboldt County Code Regulating Commercial Cannabis Activities. The County acknowledges that new unpermitted cannabis cultivation in greenhouses that uses lights during some or all of the plant production cycle has caused significant new sources of light across the landscape. The concerns expressed by the commenter that relate to cannabis production are discussed in the environmental review of that project. The comment does not address specific impacts or mitigation measures in the RDEIR. Therefore, no further response is required under CEQA.

**Comment C2-16:** This comment notes the number of pages that comprise the RDEIR and indicates that the commenter would be interested in learning how many commenters continue to participate in the General Plan Update process.

**Response to Comment C2-16:** Public comments that have been received throughout the General Plan Update process, including RDEIR comments, are available on the General Plan Update webpage at <http://humboldt.gov/577/Public-Comments>. The comment does not address specific impacts or mitigation measures in the RDEIR. Therefore, no further response is required under CEQA.

Letter C3 Mercer Fraser



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June 20, 2017

Michael Richardson  
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 Advance Planning Division  
 County of Humboldt  
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 Eureka, CA 95501  
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**Re: Mercer Fraser Company / General Plan Update – Revised Draft EIR**

Dear Mr. Richardson:

On behalf of the Mercer Fraser Company (“Mercer Fraser”), we thank you for the opportunity to comment on the Revised Draft Environmental Impact Report (“EIR”) for the Board of Supervisors Draft of the County’s General Plan Update (“Draft GPU”). The purpose of this letter is to voice our opposition to a suggestion in the EIR that changes be made to the Draft GPU’s current definition of wetlands.

This letter will discuss the Draft GPU’s current definition of wetlands and then discuss the EIR’s suggested changes to that definition.

**Draft GPU Definition of Wetlands**

Prior to adoption of the current Draft GPU, Mercer Fraser submitted letters on May 30, and July 9, 2014 requesting the Board to adopt a wetlands definition that aligns with the US Army Corps of Engineers (the “Corps”) wetlands delineation standards. As Mercer Fraser indicated in its May 30 and July 9 letters, the Corps has exclusive jurisdiction over wetlands delineation in California.

On September 8, 2014, in response to the comments of Mercer Fraser and others, the Board approved the Draft GPU’s current definition of wetlands. This definition is found in standard BR-S11 of the Conservation and Open Space Element:

**BR-S11. Wetlands Defined.** The County considers wetlands as lands transitional between terrestrial and aquatic systems where the water table is usually at or near the surface or the land is covered by shallow water. Wetlands must have all of the following three attributes: (1) at least periodically, the land supports hydrophytes, (2) the substrate is predominantly undrained hydric soil, and (3) the substrate is non-soil and is saturated with water or covered by shallow water at some time during the growing season of each year.

C3-1

Mr. Michael Richardson  
 Mercer Fraser Company – General Plan Update : RDEIR  
 June 20, 2017

(See Exhibit A.)

The above language is acceptable because it aligns with the Corps' delineation standards for wetlands.

We will now discuss the changes that the EIR suggests be made to BR-S11. These changes conflict with both the Board's prior directions and the Corps' standards.

### **The EIR's Suggested Changes to the GPU's Wetlands Definition<sup>1</sup>**

The EIR claims that the current Draft GPU language for BR-S11 is problematic because "areas cannot logically have both hydric soil substrate and non-soil substrate at the same time." However, the changes suggested in the EIR are not necessary and conflict with the Corps' wetlands delineation standards.

In "Mitigation Measure 3.11.3.2" the EIR suggests the following change to the text of BR-S11:

BR-S11. Wetlands Defined. The County considers wetlands as lands transitional between terrestrial and aquatic systems where the water table is usually at or near the surface or the land is covered by shallow water. ~~Wetlands must have all of the following three attributes: (1) at least periodically, the land supports hydrophytes, (2) the substrate is predominantly undrained hydric soil, and (3) the substrate is non-soil and is saturated with water or covered by shallow water at some time during the growing season of each year.~~ **An area is wetland if, under normal circumstances, (1) the area has continuous or recurrent saturation of the upper substrate caused by groundwater, or shallow surface water, or both; (2) the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and (3) the area's vegetation is dominated by hydrophytes or the area lacks vegetation.**

(emphasis added) (See Exhibit B.)

The changes above are not necessary because there is no logical flaw in the current language of BR-S11. The substrate can contain hydric soil as well as non-soil saturated with water or covered by shallow water in the same area.

More importantly, by indicating that wetlands can lack vegetation, the wetlands definition suggested in the EIR conflicts with the Corps standards. Unlike the language suggested above, the Corps standards require that wetlands "under normal circumstances...support, a prevalence of vegetation" adapted for water saturated soil. (See *Wetlands Delineation Manual*, US Army Corps of Engineers (1987) at pages 9-10, attached hereto as Exhibit C.)

<sup>1</sup> In the second paragraph of page 3.11-14 of the EIR, a statement is made that the County must follow the identification and classification policies of the California Department of Fish and Wildlife ("DFW") in its wetland delineation policies. As we outlined in our July 9, 2014 letter to the Board, the Corps and not the DFW has exclusive authority over wetlands delineation.

Mr. Michael Richardson  
*Mercer Fraser Company – General Plan Update : RDEIR*  
June 20, 2017

The wetlands definition currently found in BR-S11 more accurately aligns with the Corps' wetlands standards related to vegetation. Similar to the Corps' standards, the current version of BR-S11 requires that an area support hydrophytes (water adapted plants), at least periodically, in order for a positive wetlands determination to be made. The current language of BR-S11 also aligns with the Corps' wetlands characteristics related to hydrology and soil.

The changes suggested by the EIR are not necessary and conflict with the Corps' current wetlands delineation standards. The County should retain the current language found in BR-S11 of the Draft GPU.

### CONCLUSION

We appreciate the opportunity to comment on the EIR and trust that the County will find the above comments helpful in the GPU process. Please do not hesitate to contact me if you have any questions.

Very truly yours,  
HARRISON, TEMBLADOR, HUNGERFORD &  
JOHNSON 

C3-1

## Exhibit A

1. Slopes will be temporarily stabilized by slope seeding and/or planting of fast germinating seeds, such as barley or rye grass, and mulched with protective coverings such as natural or chemical stabilizations, and
2. Runoff from the site will be temporarily detained or filtered by berms, vegetated filter strips, and/or catch basins to prevent the escape of sediment from the site. Drainage controls are to be maintained as long as necessary to prevent erosion throughout construction.

### Wetlands and Other Wet Areas

**BR-S10. Development Standards for Wetlands.** Development standards for wetlands shall be consistent with the standards for Streamside Management Areas, as applicable except that the widths of the SMA for wetlands are as follows:

- seasonal wetlands = 50 ft.
- perennial wetlands = 150 ft.

and the setback begins at the edge of the delineated wetland. Buffers may be reduced based on site specific information and consultation with the California Department of Fish and Wildlife. No buffer shall be required for man-made wetlands except wetlands created for mitigation purposes.

**BR-S11. Wetlands Defined.** The County considers wetlands as lands transitional between terrestrial and aquatic systems where the water table is usually at or near the surface or the land is covered by shallow water. Wetlands must have all of the following three attributes: (1) at least periodically, the land supports hydrophytes, (2) the substrate is predominantly undrained hydric soil, and (3) the substrate is non-soil and is saturated with water or covered by shallow water at some time during the growing season of each year.

### Other Sensitive and Critical Habitats

#### Oak Woodlands

**BR-S12. Discretionary Review within Oak Woodlands.** Discretionary projects which may result in a significant effect on oak woodlands shall evaluate and mitigate any impacts, consistent with the provisions of CEQA, specifically Public Resources Code Section 21063.4.

#### Invasive Plant Species

**BR-S13. Principally Permitted Accessory Use.** Invasive plant species management and control measures shall be considered a principally permitted accessory use in all zones, except in the Coastal Zone.

### 10.3.5 Implementation Measures

**BR-IM1. Biological Resource Maps.** The County shall maintain the best available data in the form of GIS maps for the location and extent of wetlands, critical habitats, streamside management areas, rookeries, and ranges of species identified in the California Natural Diversity Database.

## Exhibit B



In working with County Planning and Building Department staff, builders, developers, and environmental consultants to prevent the loss of wetlands and wetland habitat values, CDFW determined there is a strong interest and need for a wetland mitigation bank in the Humboldt Bay-Eel River Delta area. While it is CDFW's policy to provide for the protection, preservation, restoration, enhancement and expansion of natural wetland habitat, CDFW finds that in certain limited instances, utilization of a local wetland bank may be the most environmentally sound, feasible, and cost-effective approach to mitigate for impacts to wetlands. CDFW therefore recommended the County consider working with local, state, and federal agencies and private stakeholders to promote or facilitate developing a wetland bank for the Humboldt Bay-Eel River Delta area. CDFW is willing to provide technical support for the creation of a local wetland bank. The Board of Supervisors incorporated this recommendation into the GPU with Implementation Measure BR-IMx2 - Wetlands Bank.

Under Standard BR-S11, Wetlands Defined, the County must follow the identification and classification policies of the California Department of Fish and Wildlife which considers wetlands as lands transitional between terrestrial and aquatic systems where the water table is usually at or near the surface or the land is covered by shallow water. In Standard BR-S11, wetlands must have the following three attributes: (1) at least periodically, the land supports hydrophytes, (2) the substrate is predominantly undrained hydric soil, and (3) the substrate is non-soil and is saturated with water or covered by shallow water at some time during the growing season of each year. This definition does not work well because areas cannot logically have both hydric soil substrate and non-soil substrate at the same time.

### **Conclusion**

Through implementation of General Plan Update policies, standards, and implementation measures the County will assess development impacts on wetlands and associated sensitive habitats, as part of the review process for discretionary permits, as well as to protect water quality. As discussed above, the definition of wetland contains a logical flaw, and needs to be revised.

### **Mitigation**

The following implementation measure below shall be fulfilled to help address the potential impacts related to the definition of wetlands in the General Plan Update. Alternative language is presented below that would correct the existing logical flaw in Standard BR-S11.

**Mitigation Measure 3.11.3.2.** Replace BR-S11 with the below definition of wetlands:

**BR-S11. Wetlands Defined.** The County considers wetlands as lands transitional between terrestrial and aquatic systems where the water table is usually at or near the surface or the land is covered by shallow water. ~~Wetlands must have all of the following three attributes: (1) at least periodically, the land supports hydrophytes, (2) the substrate is predominantly undrained hydric soil, and (3) the substrate is non-soil and is saturated with water or covered by shallow water at some time during the growing season of each year.~~ An area is wetland if, under normal circumstances, (1) the area has continuous or recurrent saturation of the upper substrate caused by groundwater, or shallow surface water, or both; (2) the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and (3) the area's vegetation is dominated by hydrophytes or the area lacks vegetation.

### **Level of Significance After Mitigation**

With the above revision to Standard BR-S11 and continued implementation of existing federal and state regulations, and proposed new policies and implementation measures of the General Plan Update regarding protection of wetlands, impacts to federally protected wetlands would be **less than significant**.

### **Impact 3.11.3.3. Wildlife Corridors and Nursery Sites**

Implementation of the General Plan Update would result in additional development that could interfere with the movement of native resident or migratory fish or wildlife species or with their migratory wildlife corridors, or impede the use of native wildlife nursery sites.

This impact analysis addresses item "d" of the significance standards listed in Appendix G of the CEQA Guidelines as provided in Section 3.11.2 above. Pursuant to these standards, the proposed County General Plan Update would have a significant impact if it would:

- a) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Development and land use activities consistent with the General Plan Update could result in a reduction in existing habitat, could contribute to further fragmentation of remaining natural areas, and could substantially interfere with the movement of native fish and wildlife species. These include potential impacts to special-status species, sensitive natural communities, and streams and wetlands, as well as more general wildlife habitat resources.

Roosevelt Elk habitat and deer winter range are mapped on the Biological Resources maps that identify important wildlife corridors. Within the coastal zone, a Roosevelt Elk Habitat combining zone is applied to lands which contain elk corridors, and calls for their protection.

Streams tend to serve as important movement corridors for terrestrial and aquatic wildlife, and protection of areas that qualify as SMAs is essential to protecting existing habitat functions and values. Forested areas and native woodlands also tend to provide important habitat resources to wildlife.

A substantial amount of development could occur in the unincorporated areas as a result of buildout of the General Plan Update land use designations at specified minimum parcel sizes, despite many site specific constraints that may exist. A portion of this development would occur on parcels containing SMAs.

Discretionary development that would occur under the General Plan Update would be sited and designed to avoid impacts to the movement of native resident migratory fish or wildlife species and to avoid established native resident or migratory corridors and wildlife nursery sites. Such areas are identified in biological resource maps, Humboldt County GIS layers, and the California Natural Diversity Database. The County uses these tools to assess whether or not new development would potentially impact the movement of wildlife, and to ensure that such impacts would be avoided through project design, siting, and conditions of approval.

## Exhibit C



**US Army Corps  
of Engineers**  
Waterways Experiment  
Station

Wetlands Research Program Technical Report Y-87-1 (on-line edition)

# Corps of Engineers Wetlands Delineation Manual

by Environmental Laboratory



## Part II: Technical Guidelines

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24. The interaction of hydrology, vegetation, and soil results in the development of characteristics unique to wetlands. Therefore, the following technical guideline for wetlands is based on these three parameters, and diagnostic environmental characteristics used in applying the technical guideline are represented by various indicators of these parameters.

25. Because wetlands may be bordered by both wetter areas (aquatic habitats) and by drier areas (nonwetlands), guidelines are presented for wetlands, deepwater aquatic habitats, and nonwetlands. However, procedures for applying the technical guidelines for deepwater aquatic habitats and nonwetlands are not included in the manual.

### Wetlands

26. The following definition, diagnostic environmental characteristics, and technical approach comprise a guideline for the identification and delineation of wetlands:

- a. *Definition.* The CE (*Federal Register* 1982) and the EPA (*Federal Register* 1980) jointly define wetlands as: Those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas.
- b. *Diagnostic environmental characteristics.* Wetlands have the following general diagnostic environmental characteristics:
  - (1) *Vegetation.* The prevalent vegetation consists of macrophytes that are typically adapted to areas having hydrologic and soil conditions described in a above. Hydrophytic species, due to morphological, physiological, and/or reproductive adaptation(s), have the ability to grow, effectively compete, reproduce, and/or persist in anaerobic

soil conditions.<sup>1</sup> Indicators of vegetation associated with wetlands are listed in paragraph 35.

- (2) *Soil.* Soils are present and have been classified as hydric, or they possess characteristics that are associated with reducing soil conditions. Indicators of soils developed under reducing conditions are listed in paragraphs 44 and 45.
- (3) *Hydrology.* The area is inundated either permanently or periodically at mean water depths  $\leq 6.6$  ft, or the soil is saturated to the surface at some time during the growing season of the prevalent vegetation.<sup>2</sup> Indicators of hydrologic conditions that occur in wetlands are listed in paragraph 49.

- c. *Technical approach for the identification and delineation of wetlands.* Except in certain situations defined in this manual, evidence of a minimum of one positive wetland indicator from each parameter (hydrology, soil, and vegetation) must be found in order to make a positive wetland determination.

## Deepwater Aquatic Habitats

27. The following definition, diagnostic environmental characteristics, and technical approach comprise a guideline for deepwater aquatic habitats:

- a. *Definition.* Deepwater aquatic habitats are areas that are permanently inundated at mean annual water depths  $>6.6$  ft or permanently inundated areas  $\leq 6.6$  ft in depth that do not support rooted-emergent or woody plant species.<sup>3</sup>
- b. *Diagnostic environmental characteristics.* Deepwater aquatic habitats have the following diagnostic environmental characteristics:
  - (1) *Vegetation.* No rooted-emergent or woody plant species are present in these permanently inundated areas.
  - (2) *Soil.* The substrate technically is not defined as a soil if the mean water depth is  $>6.6$  ft or if it will not support rooted emergent or woody plants.

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<sup>1</sup> Species (e.g., *Acer rubrum*) having broad ecological tolerances occur in both wetlands and non-wetlands.

<sup>2</sup> The period of inundation or soil saturation varies according to the hydrologic/soil moisture regime and occurs in both tidal and nontidal situations.

<sup>3</sup> Areas  $\leq 6.6$  ft mean annual depth that support only submergent aquatic plants are vegetated shallows, not wetlands.

### Responses to Mercer Fraser - Letter C3

**Comment C3-1:** The comment questions whether Mitigation Measure 3.11.3.2 is necessary. The commenter does not consider the definition of wetlands straw-voted by the Board to be flawed in the first place, and secondly, does not consider the replacement language in the mitigation measure to be an improvement because it conflicts with the Corps' current wetland definition.

**Response to Comment C3-1:** This mitigation is proposed to address the definition of wetlands straw-voted by the Board which contains the language that a wetland is an area that both contains substrate that is "predominantly undrained hydric soil" and at the same time, the substrate is "non-soil". While there may conceivably be circumstances where wetlands are both soil and non-soil at the same time, this language seems to be contradictory on its face, and is therefore unnecessarily confusing to the users of the GPU.

To clarify Standard BR-S11 consistent with the commenters request to be consistent with the US Army Corps definition of wetlands, which is also the intent of the wording straw-voted by the Board, Mitigation Measure 3.11.3.2 in the DEIR is revised to substitute the Corps' definition of wetlands into BR-S11:

"Mitigation Measure 3.11.3.2. Replace BR-S11 with the below definition of wetlands:

**BR-S11. Wetlands Defined.** The County shall follow the US Army Corps of Engineers Wetland Delineation manual in the identification and classification of wetlands which considers wetlands as those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs and similar areas. lands transitional between terrestrial and aquatic systems where the water table is usually at or near the surface or the land is covered by shallow water. Wetlands must have all of the following three attributes: (1) at least periodically, the land supports hydrophytes, (2) the substrate is predominantly undrained hydric soil, and (3) the substrate is non-soil and is saturated with water or covered by shallow water at some time during the growing season of each year. An area is wetland if, under normal circumstances, (1) the area has continuous or recurrent saturation of the upper substrate caused by groundwater, or shallow surface water, or both; (2) the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and (3) the area's vegetation is dominated by hydrophytes or the area lacks vegetation."

Letter C4 Humboldt Coalition for Property Rights

**Humboldt County General Plan Update  
Revised Draft Environmental Impact Report (RDEIR)**

Review of RDEIR for Inconsistencies and Conflicts

Compiled on behalf of Humboldt Association of Realtors,  
Humboldt Coalition for Property Rights,  
and North California Association of Home Builders



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## I. Concerns regarding the RDEIR's treatment of cannabis cultivation and the CMMLUO

Beginning on Page 3.2-7, the RDEIR discusses the existence, historical basis, and potential impacts of the commercial cannabis industry in Humboldt County. Though the discussion of cannabis cultivation goes on for some length, the RDEIR goes on to state that “the environmental impacts of the future regulatory program will be evaluated in a separate environmental document, and are therefore not discussed any further in this EIR” (RDEIR Page 3.2-9).

RDEIR Page 1-2, section 1.1.1. Paragraph 2., Tiering and Required approvals, states:

“This Program EIR is a first-tier environmental document that assesses and documents the broad environmental impacts that can be expected to occur from the adoption and implementation of the General Plan Update...”

It is our position that failure to more adequately address the broad environmental impacts of illegal cannabis cultivation, regulated commercial cannabis production, and the impact of the CMMLUO is a flaw in the RDEIR that violates the California Environmental Quality Act's guidelines pertaining to the requirements of a General Plan's EIR.

The RDEIR does not analyze and discuss the “significant broad environmental impacts” due to recent changes in the zoning maps and ordinance(s) that accommodated the cannabis industry in the CMMLUO. Similarly, the RDEIR does not analyze and discuss the economic and equitable impacts of the net loss of industrial zoned lands for commercial and industrial uses other than for the cannabis industry.

In several sections in the document, the RDEIR does discuss some of the impacts that will arise due to advancement of the CMMLUO, and which are already present due to historical cannabis cultivation activity. For example, Beginning on page 3.2-7, the RDEIR states:

“New roads have been bulldozed into the landscape without permits or proper design to prevent erosion. Traffic on unpaved roads is estimated to contribute as much as 60% of Humboldt County's PM<sub>10</sub>, the only criteria air pollutant for which the County exceeds established standards.”

The County lightly touches on the effects of the cannabis cultivation, and by extension the CMMLUO, is having on resources lands. This acknowledgment of the implications of cannabis cultivation is appreciated.

However, what is conspicuously missing from the RDEIR is the discussion of its impacts with respect to *each chapter of the GPU*.

Despite the awareness of those impacts, the document states that there will not be discussion and analysis here in this RDEIR on CMMLUO, rather there is to be a separate EIR for the CMMLUO that provides mitigation via an outside agency's Environmental Review and its mitigation measures.

There are goals, policies, standards and implementation measures regarding medical cannabis

C4-1

cultivation in the General Plan. There has to be discussion and analysis of it in this RDEIR for the General Plan per CEQA. If not rectified, the decision makers and the public are provided with an inaccurate and incomplete analysis.

C4-1

In addition, the Notice of Preparation that was issued in 2007 is now severely out of date, particularly in relation to existing environmental conditions on the ground. The impacts of cannabis cultivation in Humboldt County have increased exponentially over the past decade, and particularly over the last five to seven years. It is our concern that the RDEIR's discussion of cannabis impacts is inadequate because it is derived from a baseline that was established over a decade ago.

RDEIR Page 1-3. Section 1.3.1., Scoping the Issues to be Discussed in the EIR, states:

C4-2

The County distributed a Notice of Preparation (NOP) (Appendix P) to numerous agencies to let them know an EIR was being prepared for the GPU, and asking the agencies for comments on what should be included in the EIR.

The NOP was circulated in 2007, and the formal comment period for that first GPU NOP was from January 22, 2007 to February 22, 2007. This period was prior to the Humboldt County Planning Commission had making its recommendations on the GPU, and nine years prior to the Humboldt County Board of Supervisors' review of the GPU. This process created inconsistencies as well as confusion about which of the various drafts formed the actual basis for the environmental analysis.

## II. Concerns regarding proposed changes to General Plan Standard BRS-11, Wetlands Defined

In 2014, following significant debate and public input, the Board of Supervisors voted upon the language of Standard BRS-11, Wetlands Defined, and arrived at the following definition:

**BR-S11. Wetlands Defined.** ~~The County shall follow the identification and classification policies of the Department of Fish and Game which considers wetlands as lands transitional between terrestrial and aquatic systems where the water table is usually at or near the surface or the land is covered by shallow water. Wetlands must have one all of or more of the following three attributes: (1) at least periodically, the land supports hydrophytes, (2) the substrate is predominantly undrained hydric soil, and (3) the substrate is non-soil and is saturated with water or covered by shallow water at some time during the growing season of each year. Straw Vote: 4-1 (Lovelace) 9-8-14 (RDEIR Appendix A, Pg. A-78)~~

The RDEIR proposes the following changes to the language, which appears thusly on Page 3.11-14:

**Mitigation Measure 3.11.3.2.** Replace BR-S11 with the below definition of wetlands:

**"BR-S11. Wetlands Defined.** The County considers wetlands as lands transitional between terrestrial and aquatic systems where the water table is usually at or near the surface or the land is covered by shallow water. ~~Wetlands must have all of the following three attributes: (1) at least periodically, the land supports hydrophytes, (2) the substrate is predominantly undrained hydric soil, and (3) the substrate is non-soil and is saturated with water or covered by shallow water at some time during the growing season of each year.~~ An area is wetland if, under normal circumstances, (1) the area has continuous or recurrent saturation of the upper substrate caused by groundwater, or shall allow surface water, or both; (2) the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and (3) the area's vegetation is dominated by hydrophytes or the area lacks vegetation."

The logical reasoning for the change, that "This definition does not work well because areas cannot logically have both hydric soil substrate and non-soil substrate at the same time" (RDEIR 3.11.3.1., Pgs. 3.11-12), is incorrect. An example of a situation in which hydric soil substrate and non-soil substrate can coincide is sand.

Furthermore, the proposed changes stand to have a significant impact on the identification of wetlands in Humboldt County, and a significant impact on the economic viability of commercial, industrial, or residential uses that center on areas which would potentially be re-classified as wetlands under the proposed changes. The proposed language creates ambiguity and the potential for interpretation of the term "wetlands" that is not in keeping with the intent of the Board of Supervisors as reflected by their straw vote from September 9, 2014. We suggest refraining from making any changes to the language approved by the Board of Supervisors, as the proposed modification amends what has been previously agreed upon without public discussion or input.

C4-3

### III. Concerns regarding RDEIR's evaluation of economic and social effects

Section 21083(c) of CEQA guidelines requires an agency to determine that a project may have a significant effect on the environment if it will cause substantial adverse effects on human beings, either directly or indirectly. The RDEIR largely ignores vetting the vast majority of policies, goals, and implementation measures contained within the proposed General Plan with considerations given to social or economic impacts.

A 2015 ruling by the CA Supreme Court in *California Building Industry Assoc. v. Bay Area Air Quality Management District* (Dec. 17, 2015) *Cal.4th* does establish that “CEQA generally does not require an analysis of how existing environmental conditions will impact a project’s future users or residents.” (2016 CEQA State Guidelines Pg. Xxiv). However, that ruling applies only to existing conditions, and not to conditions which may be created as a result of the implementation of the proposed General Plan.

C4-4

Further, leeway is sometimes given to the lead agency preparing an EIR to determine whether analyzing impacts of a social or economic nature is necessary. This may have been the position taken in the preparation of this specific RDEIR document. However, due to the exhaustive number of policies and new regulations contained within the proposed General Plan which stand to have extremely significant impacts on the social and economic fabric of Humboldt County, failure to address those potential impacts is in conflict with the intent of both the proposed General Plan and EIR.

Furthermore, the Section 21083(c), as discussed in *CBLA v. BAAQMD*, is still codified in the language presented in the most up-to-date CEQA State guidelines.

#### a. Absence of analysis of the Economic Development element

A majority of policies, goal, implementation measures, etc., contained within the General Plan's Economic Development element undoubtedly stand to have far-reaching effects on both the environment and on the human residents of Humboldt County.

The RDEIR states that the Economic Development element is an optional element. We wish to note that a number of optional elements in the GPU are fully analyzed in the RDEIR – this creates an inconsistency in the approach to the General Plan and seems to conflict with the notion that an EIR should examine all facets of a General Plan that have potential for significant environmental impacts.

C4-5

In keeping with 21083(c), in which CEQA requires an agency to determine that a project may have a significant effect on the environment if it will cause substantial adverse effects on human beings, either directly or indirectly, we were anticipating a section which would examine potential impacts of the GPU on industrial and commercial growth. We were similarly anticipating an entire section on jobs, commercial uses and industrial uses to be in this section, or at least within this document as is required by CEQA. Jobs, or the lack of them, resulting from the regulatory zoning constraints on available develop-able lands directly and significantly impacts people and their families.

*b. Analysis of regulatory constraints*

A number of policies in the proposed General Plan would place regulatory constraints on both private and public lands. Whether the reasoning behind creating these regulatory constraints is sound or not, the RDEIR fails to address how these regulatory constraints may or may not impact the environment, the economy, or the people of Humboldt County.

From RDEIR Page 2-23, Section 2.5:

“The resulting developable acreage is shown in Table 2.5-1. Approximately 1,491,900 acres will therefore likely remain in open space, resource production, and recreational uses, with little or no development. There remains 748,861 acres of vacant and underdeveloped area available for development without these physical constraints. That area could theoretically provide for as many as 38,972 additional dwelling units in the unincorporated area of the County if developed at the full density allowed for each land use designation as proposed in the GPU. The GPU provides ample room for future development, even without the areas with significant physical constraints.”

C4-6

The above statement holds that County policy under the proposed plan would allow for a significantly larger number of new dwelling units than the RDEIR anticipates and accounts for. Per CEQA, the County must address the potential impacts of the GPU, particularly when those impacts would be explicitly allowed and/or created by the implementation of the General Plan. County policy pertaining to land use, zoning, and development regulations will be the direct cause of these foreseeable impacts.

Conversely, assuming that the apparently conflicting statements and tables in the RDEIR are a correct measure of available developable land within Humboldt County, the general plan does not allow for this level of development. There is an insufficient amount of appropriately zoned land for the theoretical 38,972 additional dwelling units, and there is similarly an inadequate amount of land zoned for the commercial and industrial services that would be required to support the families residing in those new dwelling units.

A further illustration of the RDEIR's failure to examine regulatory constraints can be found in the discussion in RDEIR Section 3.16, Scenic Resources, particularly with regards to limitations on development that would impinge upon “scenic” vistas. This excerpt from 3.16 Pg. 3.16-7 demonstrates the potential problems:

The General Plan Update land use diagram largely maintains existing resource and open space land use designations, which would serve to limit the development of forested and agricultural open space lands. In addition, in Conservation and Open Space Element, Scenic Resources, Policy SR-P1, Development in Identified Scenic Viewsheds, in combination with Implementation Measure SR-IM1, Mapping of Scenic Areas and Scenic Highways, would identify and map scenic areas and allow development within such lands only in a manner consistent with natural slopes and contours. Scenic viewsheds are not currently identified or mapped, and would be mapped as part of a public process as an implementation of the General Plan Update. Standard SR-S1, Development in Mapped Scenic Areas, requires that discretionary and ministerial development avoid visual disturbance of natural contours, hilltops, tree lines, forest landscapes, bluffs and rock outcroppings, to the maximum extent feasible. It further requires that roads and public utility corridors be as narrow as feasible and follow natural contours, natural features disturbed by construction be restored as close to natural condition as feasible, and prohibits new off-premise

C4-7

billboards.

A number of issues arise from the implications of this text with regards to regulatory constraint. If the concepts described are proposed to apply to private property, this would represent a significant regulatory burden. It would lead to significant angst for private property owners, substantial new costs on new development, would economically encumber many tens of thousands of acres in Humboldt County, and would be inconsistent with goals stated in both the Economic Development and Conservation and Open Space elements (ED-G1, ED-G2, CO-G1).

C4-8

There is no analysis of this concept that justifies such an encumbrance for private landowners. In viewing the full text of the chapter, it seems that free rein is granted to the County to designate an alarmingly significant amount of land as “scenic” without providing any basis for how the process of designating and mapping “scenic” areas would occur. This improper delegation of authority is not analyzed whatsoever for its potential social and economic impacts.

Further, no definition of terms that are crucial to the reading of this section are provided in either the proposed General Plan or in the RDEIR. Without definitions for key terms herein (e.g., “identified scenic view shed”, “visual disturbance of natural contours”, “hilltops”, “tree lines”, “forest landscapes”, “bluffs and rock outcroppings”), it is impossible to understand the scope or impacts of the proposed goals, policies, standards and implementation measures. There is a lack of quantifiable measures by which to analyze the impacts of such a policy.

*c. Water capacity for industrial and commercial uses*

There is a conspicuous lack of discussion regarding wastewater and water capacity for industrial and commercial uses and development. The RDEIR discusses the capacity available for newly constructed dwelling units at length and in great detail; however, the omission of the same discussion with regards to industrial and commercial uses continues a trend of minimizing concern for industrial and commercial uses.

C4-9

The RDEIR's discussion of water and wastewater capacity occurs on RDEIR Pages 3.3-42, -55. Although text within those pages generally acknowledges the potential for increased need for water capacity for commercial or industrial use, the lack of detail in those discussions is blatant when compared to similar discussions with regards to residential dwelling units.

#### **IV. Concerns regarding RDEIR's discussion of maximum build-out potential and densities**

##### *a. Projected build-out density*

The RDEIR states that “The estimated maximum feasible housing development potential of the General Plan Update land uses is far greater (38,972 housing units) than can reasonably be expected to be developed within the planning period of the General Plan (2016-2040)” (RDEIR 2-23). It also provides: “The proposed General Plan Update (GPU) establishes land use patterns and policies to guide development in a manner consistent with State law. The GPU has a 20 - 25 year planning horizon and there is more than enough allocated land use to meet projected demands for residential, commercial, and industrial uses during this period.” (RDEIR 2-9).

The fundamental assumption of the law is that general plans guide for future development within the plan area for a given plan period. There is no analysis or discussion in this RDEIR as to how the maximum growth levels stated above can be accommodated in an environmentally balanced way if the community or the populace of a given area experiences growth. Discussion of the General Plan should not be limited to projected levels of growth, but rather on the potential maximum build-out density. Though it may seem far-fetched at this point in time, growth to that level is possible. According to the RDEIR, the County's own policies, land use designations, and zoning allow for the maximum build-out to occur. The RDEIR must analyze the level of growth that the acreage in the county allows.

Furthermore, Table 2.5-1 shows that the anticipated need for housing units in the County's unincorporated areas at peak projected population is 1,721 units. In addition to concerns stated above regarding the need to account for increased or maximum potential growth should it occur, it is also highly likely that a significant number of those anticipated 1,721 units needed by 2028 have already been constructed without the knowledge of the County of Humboldt, primarily as result of cannabis cultivation in unincorporated areas and the construction of dwelling units and structures related to the support of those activities. While this is not an issue that the RDEIR or County need address directly, it underscores the danger of assumption when considering anticipated build-out levels.

##### *b. Acreage for industrial and commercial use*

Table 3.7-5 lists a total acreage of land planned for industrial uses by community planning areas for the IG and IR plan designations. However, that total only reflects the inland areas of the County. This is noteworthy, because in Section 3.4, Public Services, the RDEIR claims that there is sufficient land zoned for commercial and industrial uses in the County, but also states that the majority of that land is located in and around Humboldt Bay and/or the coastal zone.

The inconsistency arises when one considers that the RDEIR does not otherwise address any of the areas located in the coastal zone, instead deferring discussion of those areas to the Local Coastal Plan, yet opts to include them in its inventory of industrial and commercial land. If those areas are included in the General Plan or the RDEIR as areas that will likely undergo future development, they need be addressed and the impacts of that development accounted for.

C4-10

C4-11



A further illustration of the complexity and conflicting statements regarding the coastal zone can be found in Mitigation Measure 3.10.3.4.a (RDEIR pg. 3.1-35), which reads:

**Mitigation 3.10.3.4.a.** The following Safety Element implementation measure shall be added to require the County address new development in tsunami hazard areas:

**S-S7. Tsunamis.** *New development below the level of the 100-year tsunami run-up elevation shall be limited to public access, boating, public recreation facilities, agriculture, wildlife management, habitat restoration, and ocean intakes, outfalls, pipelines, and dredge spoils disposal.*

C4-12

While assuming that the above mitigation measure does not preclude private development in the tsunami run-up zone entirely, but rather would require such development to occur at elevation above the run-up elevation, this mitigation measure clearly illustrates an intent in the RDEIR to regulate activity in the coastal zone. However, the intent and attention to the coastal zone is not consistent throughout the RDEIR.

c. Cumulative Impacts

As an extension of the RDEIR's focus on an estimated need for development as compared to the maximum possible level of build-out density, section 5.2 of the RDEIR, Cumulative Impacts, also vastly underestimates the potentially massive impacts on public services that the General Plan may stand to produce.

The discussions of Impact 3.3.3 - Utilities and Services, Impact 3.3.3.2 - Water supply, Impact 3.4.3.1 - Schools, Impact 3.4.3.2 - Fire Protection, and Impact 3.4.3.3. - Law Enforcement are all based on the assumption of the RDEIR that relatively low-levels of development will occur. While this may be true, the fact is that the proposed General Plan's potential development impacts would leave all of these services woefully unable to cope with higher level of service demands.

C4-13

## V. Numerical and Table Inconsistencies

### *a. Available water and wastewater connections*

The primary numerical inconsistencies identified within the RDEIR revolve around numerical differences in values set forth in narrative text and corresponding tables. The most prevalent inconsistency of that nature occurs in the RDEIR's discussion of the current and projected capacity of a number of Community Service Districts in various areas of Humboldt County.

For example, RDEIR Table 3.3-1 shows that the Loleta Community Services District has 258 water connections, and that there are an additional 56 water connections available. However, narrative text in the RDEIR found on page 3.3-15, "Loleta Community Services District," cites a 2008 LAFCo report which states that "The [Loleta Community Services] District believes that they can supply an additional 60-70 (40 to 50 based on Building Permit data as of 2016) homes." This apparent inconsistency in numbers is confusing, especially when one considers that the RDEIR does not mention the number of available connections for certain CSD's at all in the narrative text pertaining to those CSD's.

C4-14

For example, Table 3.3-1 and Table 3.3-2 show that additional water and wastewater connections are available for a number of CSD's which are not reflected in the narrative text of the RDEIR.

To illustrate, Table 3.3-2 shows that the Garberville CSD has 353 existing wastewater connections, and that there are an additional 180 connections available. However, the RDEIR does not explicitly state that there are additional connections available for Garberville. The inconsistency between the numbers presented in Table 3.3-1 and Table 3.3-2 and as presented in corresponding narrative text, in addition to the inconsistency in which the capacity of individual CSD's, is confusing.

These two issues with consistency between RDEIR text and tables concerning the carrying capacity of water and wastewater districts apply to the following:

Garberville CSD, Weott CSD, Loleta CSD, Riverside CSD, Scotia CSD, Orleans CSD, Willow Creek CSD, Hydesville CWD, Orick CSD, Fieldbrook/Glendale CSD, RID (Shelter Cove), and Manila CSD.

### *b. Total available acreage*

Table 3.2-3 shows total number of available acreage for lands designated T, AE, and AG. The table shows there are 897,026 available T-designated acres, 76,311 available AE-designated acres, and 377,838 available AG-designated areas, for a total of 1,351,175 available acres.

C4-15

Those numbers are inconsistent as compared to tables 3.2-4 through 3.2-15, which provide total available acreage for lands designated T, AE, or AG, in specific and smaller geographic areas located in Humboldt County.

The totals for tables 3.2-4 through 3.2-15 show there are 893,840 available T-designated acres, 113,608 available AE-designated acres, and 381,846 available AG-designated acres, for a total of 1,389,294 available acres. This represents a 38,119 acre discrepancy between the tables.

C4-15

*c. Acreage for industrial use*

RDEIR page. Table 3.7-5 (pp 7-21, -22) lists a total of land planned for industrial uses by community planning areas for the IG and IR plan designations. However, that total only reflects the inland areas of the county. This is noteworthy, because in section 3.4, Public Services, the RDIER makes the claim that there is sufficient land zoned commercial/industrial in the county – primarily in and around Humboldt Bay and/or in the coastal zone.

C4-16

Further, the industrial acreages shown in Table 3.7-5 are inconsistent with those shown in Table 2.5-1 on page 2-24.

*d. Incorrect table provided*

RDEIR Pg. 3.7-21 through 3.7-23 contain numerous incorrect references to Table 3.7-4 Land Planned for Industrial Uses. Table 3.7-4 appears on 3.7-16 and is titled Summary of Humboldt County Risk Assessment. We assume that the incorrect references to Table 4.7-4 contained in RDEIR Pgs. 3.7-21 through 3.7-23 are meant to reference Table 3.7-5, found on Pg. 3.7-21.

C4-17

## VI. Mitigation Measures which do not meet CEQA/State EIR requirements

Paragraph 4 of the RDEIR, Page 1-2, Section 1.1.1 states:

All mitigation measures in the certified EIR will be incorporated into future actions carrying out the General Plan. To assist in the implementation of the General Plan Update, this EIR contains recommendations for some of the analysis that will be needed in the future. For example, this EIR establishes performance measures that would be applied for future projects when the County Issues permits and approvals required for those projects.

Of concern is that some of the “mitigation measures” listed throughout this Program EIR do not meet the criteria for mitigation as laid out in CEQA. Mitigation measures must be measurable or quantitative measures attainable in a reasonable time frame, and no mitigation can be deferred to another report or future action. Many of the “mitigation measures” in the RDEIR call for deferral or stipulate that future yet unspecified action will be taken to accomplish their mitigation goals.

In a number of instances, some items identified as “mitigation measures” are similar in wording to goals, policies, standards or implementation measures that were formally rejected by the planning commission in their review of the draft general plan update.

There is absolutely no objection to presenting the “mitigation” items in question which are currently identified as mitigation measures, but would more appropriately be identified as new or modified goals, policies, standards or implementation measures, to the Board of Supervisors for consideration and re-circulation; however, they should not be identified as mitigation.

In other instances, impacts are lacking mitigation measures where they require one. This often results from either relying on the efforts of other agencies or underestimating the level of significance to which an impact rises.

The following impacts lack mitigation measures: 3.3.3.1, 3.3.3.3, 3.4.3.1, 3.4.3.2, 3.4.3.3, 3.11.3.1, 3.11.3.3, 3.12.4.3, 3.13.4.1, 3.14.3.2, 3.15.3.2, 3.17.4.1, 3.17.4.2

The following items are mitigation measures which do not comply with CEQA requirements: 3.5.3.1a, 3.5.3.2a, 3.11.3.2, 3.11.3.5, 3.15.3.1, 3.15.3.1a, 3.16.3.1, 3.16.3.2, and 3.16.3.3a

The items which do not comply with CEQA requirements are shown, in full, in Appendix A of this document.

C4-18

## VII. Policies lacking Implementation Measures

There are a number of policies present in the General Plan that lack implementation measures which explicitly demonstrate the manner in which the aim of the policy is to be carried out. This is a defect per the state guidelines which dictate the requirements of a General Plan.

As it pertains to the RDEIR, it is our concern that policies which may have future impacts but lack implementation measures are difficult to evaluate from an EIR standpoint as there is no indication of what the impacts of carrying out that stated policy goal may be.

For example, consider Urban Lands - Policy P2:

**“UL-P2. Streamlined Subdivision Approval.** The County shall streamline the approval process for subdivisions located in designated Housing Opportunity Zones within Urban Development Areas.”

Without an implementation measure to accompany this policy, it is impossible to gauge whether the method by which the County shall streamline the approval process for the type of subdivision referenced above will have an impact at all, let alone whether that impact is significant.

Again, with regards to the RDEIR, the evaluation of UL-P2 is inadequate because the RDEIR has no stated or implied potential impact(s) arising from implementation which it can address.

Below is a list of all policies we were able to locate; potentially, there are policies which lack implementation measures which we did not identify remaining in the General Plan.

Policies lacking implementation measures:

GP-P10, UL-P2, UL-P9, UL-P11, UL-P15, UL-P17, UL-P18, UL-P19, UL-P20, UL-P21, UL-P21, RL-P1, RL-P2, RL-P3, RL-P4, RL-P6, RL-P7, AG-P2, AG-P7, AG-P9, AG-P11, AG-P12, AG-P13, AG-P14, AG-Px, AG-Pxx, FR-P8, FR-P9, FR-PX, FR-PX2, FR-P11, FR-P14, FR-PX3, FR-P16, FR-P19, IS-PX, IS-P20, IS-P21, C-P4, C-P5, C-P8, C-PX, C-P9, C-P10, C-P13, C-P17, CP-19, C-P27, C-P28, C-P30, C-P32, C-P35, C-P36, C-P?, C-P38, C-P39, C-P40, C-P41, C-P42, C-P44, C-P45, C-P47, C-PX8, ED-P3, ED-P7, ED-P8, ED-P9, ED-P10, ED-P11, ED-P18, ED-P5X, BR-P4, BR-P6, BR-P9, SR-PX, SR-P1, SR-PXX, WR-P1, WR-P2, WR-P4, WR-P5, WR-P6, WR-XX, WR-Px1, WR-P8, WR-P10, WR-P11, WR-P12, WR-Px7, WR-P18, WR-P20, WR-P25, WR-P27, WR-P28, WR-P29, WR-P29x, WR-P31, WR-P32, WR-P33, WR-P33, WR-P34, WR-P40, CO-P1x, CO-P1xx, CO-P4, CO-P7, CO-Px4, N-P1, N-P4, S-P1, S-P2, S-PX7, S-P6, S-P7, S-P8, S-PX1, S-P11, S-PX2, S-PX3, S-PX4, S-P13, S-P25, S-P26, S-P30, E-P2, E-P7, E-P9, E-P9x, E-P10, E-P13, E-P14, E-P15, E-PX2, E-PX3, AQ-P1, AQ-P2, AQ-P4, AQ-P5, AQ-P6, AQ-P7, AQ-P8, AQ-Px, AQ-P11, AQ-P12, AQ-P13, AQ-P15, H-P3, H-P6, H-P7, H-P10, H-P12, H-P13, H-P29, H-P30, H-P31.

C4-19

### **VIII. Concerns regarding the lack of an Implementation Action Plan**

Per Government Code Section 65564, *“Every local open-space plan shall contain an action program consisting of specific programs which the legislative body intends to pursue in implementing its open-space plan.”*

The County has yet to produce an Implementation Action Plan. The general plan includes a placeholder for such a plan, but the failure to circulate the implementation action plan for public review renders the general plan update process inadequate. The public must be given the opportunity to evaluate the implementation action plan in light of the GPU and to provide comments on the implementation action plan. Until the implementation action plan is complete and provided for public review, the County cannot approve the GPU.

A thorough implementation action plan includes the following:

- The specifics of the mitigation measure and how it will be designated and implemented.
- Identify measurable performance standards by which the success of the mitigation can be determined.
- Provide for contingent mitigation if monitoring reveals that the success standards are not satisfied.
- Identify the agency, organization or individual responsible for implementing the measure.
- Identify the specific locations of the mitigation measure.

C4-20

## IX. Miscellaneous Issues

- A significant number of items in this RDEIR state certain policies, goals, implementation measures, etc., are to be given “priority” consideration, or are a “priority” of the plan. However, per the ruling of *Sierra Club v. Bd. Of Supervisors (1981) 126 Cal.App.3d 698, 704*, all sections, policies, goals, etc., of a plan must stand on equal footing and cannot be prioritized over or subverted by any other item of the plan. This is not to say that the word “priority” is impermissible as a whole, but is inappropriate in places which attempt to give priority to a policy, goal, or proposed action at the expense of another. A suggestion would be to simply alter the word “priority” to a similar descriptor, such as the word “focus”. C4-21
- A number of references are made to the Ridgewood Village Draft EIR, notably on page 3.4-18; it is our understanding that this document cannot be relied on in the RDEIR in any manner because the EIR for that project was never accepted or certified by the County of Humboldt. C4-22
- RDEIR Chapter 4, Evaluation of Plan Alternatives, does not address General Plan Alternative C. The beginning of Chapter 4 discusses the RDEIR's reasoning for precluding Alternative C; however, in light of CEQA requirements regarding discussion of plan alternatives, this seems to be a deficiency. C4-23

## APPENDIX A – RDEIR REVIEW

### Mitigation Measures which do not meet CEQA Requirements

**Mitigation 3.3.3.2.a.:** The following implementation measure shall be added to the Water Resources Element to ensure that water supply and availability is fully characterized within each watershed where such information is not adequately known:

**WR-IMx. Water Supply Evaluation and Monitoring.** Conduct watershed level evaluations within two years after the adoption of the General Plan Update to determine the long term surface and groundwater supply, including seasonal, average, dry year, and multiple dry year supplies, and beneficial uses of water to determine an estimate of the quantity of water available for future development. Work with water and wastewater related special districts, regulators, and other appropriate organizations to monitor watershed conditions.

**Mitigation 3.5.3.1.a.** The following policies shall be added to the Circulation Element and would require the implementation of transportation demand management programs with new larger scale development in the unincorporated area.

***C-P3. Consideration of Transportation Impacts in Land Use Decision Making.*** Decisions to change or expand the land use of a particular area shall include an analysis of the impacts to existing and proposed transportation facilities and services so as to minimize or avoid significant operational, environmental, economic, and health-related consequences.

***C-Px9. Regional Transportation Demand Management Funding.*** Encourage HCAOG to seek funding to support transportation demand management planning and to promote strategies that can lower the demands made on the road and highway system, reduce energy consumption, and improve air quality.

***C-Px10. Transportation Demand Management Programs.*** Require residential subdivisions and multifamily development that would result in fifteen or more dwelling units, and non-residential development that would employ greater than ten persons, and that require a discretionary permit, to comply with County transportation demand management programs.

***C-IMX6. Transportation Demand Management.*** Amend the Zoning Regulations to include criteria for the development and implementation of transportation demand management programs as required by this Plan.



**Mitigation Measure 3.5.3.2.a.** Amend existing policies and add the following implementation measure to the Circulation Element that establishes a multi-faceted program to lessen impacts relating to traffic congestion:

***C-Px. Countywide Traffic Impact Fee Program.** In coordination with the cities within the County, shall develop and implement a countywide traffic impact fee program that addresses impacts on major roads resulting from development in cities and unincorporated areas. Adopt this fee within one year of the adoption of the General Plan Update. A traffic impact fee is currently being evaluated for the Greater Eureka Area, encompassing the Eureka urbanized area.*

**Mitigation Measure 3.11.3.2.** Replace BR-S11 with the below definition of wetlands:

**“BR-S11. Wetlands Defined.** The County considers wetlands as lands transitional between terrestrial and aquatic systems where the water table is usually at or near the surface or the land is covered by shallow water. Wetlands must have all of the following three attributes: (1) at least periodically, the land supports hydrophytes, (2) the substrate is predominantly undrained hydric soil, and (3) the substrate is non-soil and is saturated with water or covered by shallow water at some time during the growing season of each year. An area is wetland if, under normal circumstances, (1) the area has continuous or recurrent saturation of the upper substrate caused by groundwater, or shallow surface water, or both; (2) the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and (3) the area’s vegetation is dominated by hydrophytes or the area lacks vegetation.”

**Mitigation Measure 3.11.3.5.a.** To avoid impacts to established Habitat Conservation Plan areas through direct conversion to other uses, the following policy shall be added to the Conservation and Open Space Element, Biological Resources section that states the following:

***BR-IM1. Biological Resource Maps.** The County shall maintain the best available data in the form of GIS maps for the location and extent of wetlands, critical habitats, streamside management areas, Habitat Conservation Plan Areas, rookeries, and ranges of species identified in the California Natural Diversity Database.*

**Mitigation Measure 3.12.4.2:** Add Implementation Measure AQ-IM7 to the Draft General Plan as follows:

**AQ-IM7.** Regulate the location and operation of land uses to avoid or mitigate harmful or nuisance levels of air emissions to the following sensitive receptors: residential uses, hospitals and nursing/convalescent homes, hotels and lodging, schools and day care centers and neighborhood parks. New development shall follow the recommendations for siting new sensitive land uses consistent with the ARB’s recommendation as shown in Table 3.12-4.

**Mitigation 3.15.3.1.a.** In order to protect existing parkland from deterioration that could result from development pursuant to the General Plan Update, the following Policies and Implementation Measures shall be added to the Community Infrastructure and Services Element:

**IS-Px. Parks Master Plan.** *In cooperation with other park service providers, the County shall establish and maintain a Parks Master Plan that would assess current facilities within each inland and coastal planning area, determine appropriate locations for new facilities, and identify funding options.*

**IS-Sx. Interim Parks and Recreation Standards.** *Parks and recreation standards contained in the Government Code Section 66477 shall be used as the standard for parkland dedication in the review of divisions of land for which a tentative map is required pursuant to Section 66426, until such time that the County has established parks and recreation standards for new development that differentiate between urban and rural settings; specify acreage of park land of 3 acres per 1,000 residents; and specify land dedication, in-lieu fee, or other mechanisms to fund park and recreation improvements and funding for operation and maintenance.*

**Mitigation 3.16.3.1.a.** Standard SR-SXXX, Scenic Highway Map, shall be added to the General Plan Update to reduce potential adverse impacts to scenic highways that could be caused by ministerial projects until SR-IM1, Mapping of Scenic Areas and Scenic Highways, is implemented:

**SR-SXXX. Scenic Highway Map.** *Until such time as a General Plan Scenic Highway Roadway Map is prepared and adopted, Humboldt County Highways listed in Sections 263.1 through 263.8 of the California Streets and Highways Code shall be considered to be Scenic Highways pursuant to Policy SR-P3, Scenic Highway Protection, and the County shall address the potential for significant impacts to scenic resources during ministerial and discretionary permit review.*

**Mitigation 3.16.3.2.a.** The following policy would lessen potential impacts to natural amenities that are important to visual character:

**BR-Px. Landmark Trees.** *Establish a program to identify and protect landmark trees, including trees that exhibit notable characteristics in terms of their size, age, rarity, shape or location.*

**Mitigation 3.16.3.3.a** . In order to minimize light trespass, light pollution, and glare, new development and projects that would make significant parking lot improvements or add new lighting would be required to prepare a lighting plan. The following new program would need to be added to the Scenic Resources Chapter of the Conservation and Open Space Element:

***SR-IMX Lighting Design Guidelines.*** Amend the Zoning Regulations to include lighting design guidelines for discretionary projects. Require new development and projects that would make significant parking lot improvements or add new exterior lighting to submit a lighting plan consistent with these guidelines. Lighting design guidelines should address:

***A. Intensity*** – Acceptable standards shall be defined for various land uses and development types specifying the maximum allowable total lumens per acre.

***B. Directional Control*** – Standards shall be developed to minimize the upward transmission and intensity of light at various distances from its source through the use of full-cutoff lighting, downward casting, shielding, visors etc.

***C. Signage*** – Standards with respect to illuminated signs shall be developed that prohibit or limit the size, spacing, design, upward transmission of light, and hours of operation. In addition, signs should be white or light colored lettering on dark backgrounds.

***D. Night Lighting*** – Hours of operation for various uses shall be specified in order to prohibit all night lighting except when warranted for public safety reasons. On demand lighting shall be encouraged.

***E. Incentives*** – The County shall develop incentives for residents and businesses encouraging the conversion of existing lighting sources to compliant ones.

***F. Enforcement*** – These standards shall be incorporated into the County Development Code and design review process for new development.

## APPENDIX B – RDEIR REVIEW

### Policies lacking Implementation Measures

#### Chapter 4. Land Use

<p><b>GP-P10. Conversion of Resource Lands.</b> Parcels of timber site quality III or higher and prime agricultural lands suitable for resource production should not be included within Urban Expansion Areas unless the County makes a finding that there are no alternatives to increase the Urban Expansion Area on lands less suitable for resource production.</p>
<p><b>UL-P2. Streamlined Subdivision Approval.</b> The County shall streamline the approval process for subdivisions located in designated Housing Opportunity Zones within Urban Development Areas.</p>
<p><b>UL-P9. Historic Structures.</b> <u>Retain and restore significant</u> historic resources to serve as focal points of neighborhoods and communities.</p>
<p><b>UL-P11. Natural Amenities.</b> Encourage <u>the incorporation</u> of natural amenities (i.e. landmark trees and rock outcroppings) into <u>their design new project designs</u>.</p>
<p><b>UL-P17. High Density Uses Near Parks.</b> The County shall consider planning higher density mixed-uses and/or commercial uses adjacent to parks to promote park use and safety.</p>
<p><b>UL-P18. Traffic Calming.</b> Traffic calming measures which emphasize pedestrian safety and convenience should be considered for all urban roadway designs. Possible traffic calming measures include chicanes, curb extensions, street trees and traffic circles.</p>
<p><b>UL-P19. Underground Utilities.</b> Encourage and assist in undergrounding existing utilities.</p>
<p><b>UL-P20. Landscaping.</b> All designs shall use landscaping to enhance the appearance of neighborhoods, control erosion, conserve water, improve air quality and improve pedestrian and vehicular safety.</p>
<p><b>UL-P21. Marijuana Cultivation.</b> Cultivation of medical marijuana shall be regulated by ordinance to provide for the health, safety, and welfare of the community but shall not interfere with a patient's right to medical marijuana.</p>
<p><b>RL-P1. Compatible with Resource Production.</b> Planned development on rural residential lands adjacent to designated agricultural and timberlands shall be compatible with agriculture and timber production</p>
<p><b>RL-P2. Water Withdrawal.</b> Cumulative impacts of water withdrawal from surface and groundwater sources and cumulative impacts from on-site sewage disposal systems shall be assessed during the zoning and subdivision, and, in critical watersheds, any other discretionary review of development in all areas designated for rural residential development</p>

<p><b>RL-P3. Rural Commercial Uses.</b> New tourist, commercial, and retail outlets shall be located within the Rural Community Center land use designation or designated Community Planning Areas or other existing developed areas with development of a similar nature, unless the use meets rural cottage industry standards or is characteristic of, and compatible with, a rural setting.</p>
<p><b>RL-P4. Fire Safety Hazards.</b> Support implementation of State Responsibility Area Fire Safe Standards and Wildland-Urban Interface Building Codes for new development and voluntary programs for fuels reduction, dwelling fire protection and creation of defensible space for existing development.</p>
<p><b>RL-P6. Rural Development in the King Range.</b> All development within the boundaries of the King Range National Conservation Area shall be consistent with the Bureau of Land Management's Management Plan.</p>
<p><b>RL-P7. Clustered Rural Residential Development.</b> Clustered rural residential development is encouraged on rural lands suitable for development consistent with planned densities. Density bonuses may be provided where significant permanent land dedications are secured.</p>
<p><b>AG-P2. Support Voluntary Purchase of Development Rights.</b> The County shall support the voluntary purchase of development rights to provide income to farm operations and limit the intrusion of residential development into agricultural lands.</p>
<p><b>AG-P7. Agricultural Production in Conservation Areas.</b> The County shall support continued agricultural production on lands placed into conservation easements or acquired by public agencies for conservation purposes. Enforceable provisions contained in terms of sale, deeds and conservation easements shall require continued management for agricultural production.</p>
<p><b>AG-P9. Predator Control.</b> Support predator control programs that comply with federal, state and local laws in order to reduce livestock and other agricultural production losses.</p>
<p><b>AG-P11. Support Vegetative Management Programs.</b> Support vegetation management programs (controlled burning, etc.) when it is found that they improve the availability and quality of rangeland for livestock and wildlife, reduce the hazard of disastrous wildfires, and increase water quality and quantity.</p>
<p><b>AG-P12. Advice from Agricultural Community.</b> Seek advice from organizations and affected individuals within the agricultural community for any future evaluation of land areas needed for urban development or for any consideration of requests by Humboldt's Local Agency Formation Commission (LAFCo) to change spheres of influence or urban service boundaries next to or near agricultural lands.</p>
<p><b>AG-P13. Agricultural Zoning and Parcel Size.</b> Utilize Agricultural Exclusive (AE) and Agricultural Grazing (AG) land use classifications to ensure appropriate parcel sizes and land use for continuing availability of the necessary agricultural land base.</p>
<p><b>AG-P14. Residential Uses on Timberland Production Zone (TPZ) Lands within Agricultural Preserves.</b> Residential uses on TPZ lands within agricultural preserves shall be consistent with the requirements of the Williamson Act and local Williamson Act Guidelines.</p>

<p><b>AG-Px. Compliance with Regulations.</b> The County shall place a priority on abatement of violations that result in agricultural land conversion, loss of agricultural productivity or conflicts with neighboring agricultural operations.</p>
<p><b>AG-Pxx. Protect Productive Agricultural Soils.</b> Development on lands planned for agriculture (AE, AG) shall be designed to the maximum extent feasible to minimize the placement of buildings, impermeable surfaces or non-agricultural uses on land as defined in Government Code Section 51201(c) 1- 5 as prime agricultural lands.</p>
<p><b>FR-P8. Protection of High Quality Timberlands.</b> Timberlands planned and zoned for timber production should be retained for timber production, harvesting and compatible uses, and reclassification of the Timberland Production Zones (TPZ) shall be done in accordance with the statutory requirements.</p>
<p><b>FR-P9 Residential Construction on TPZ Zoned Parcels.</b> Recognize the right to construct a residence and accessory buildings under a ministerial permitting process County standard consistent with other Elements of the General Plan when the use does not detract from the growing and harvesting of timber and associated compatible uses.</p>
<p><b>FR-PX Secondary Residential Construction on TPZ Zoned Parcels.</b> Second residential units may be allowed on TPZ parcels greater than 160 acres; and, may be allowed on TPZ parcel less than 160 acres as a conditional use only in the area already converted, intended to be converted, or that does not meet the definition of timberlands. Seconds units may be allowed on TPZ parcels less than 40 acres within Community Planning Areas.</p>
<p><b>FR-PX2 Landowner-initiated Rezoning of TPZ Parcels.</b> Landowner-initiated rezoning of TPZ parcels shall be done according to state law (Section 51120 of the Government Code).</p>
<p><b>FR-P11. Lot Line Adjustments.</b> Lot line adjustments of TPZ parcels may be approved in order to consolidate logical timberland management units or facilitate clustered residential development. Such adjustments shall be in keeping with the spirit and intent of TPZ and shall not result in a net reduction of the area of TPZ available for forest management unless a finding is made by the Board of Supervisors that it is in the public interest.</p>
<p><b>FR-P14. Public Utilities on TPZ Lands.</b> Where feasible avoid locating federal, state, or local public improvements and utilities in TPZ where the project or land acquisition will have a significant adverse affect on the production of timber or ecosystem services.</p>
<p><b>FR-PX3. Transfer of Development Rights (TDR) Program.</b> Research and develop, if feasible, a voluntary Transfer of Development Rights program as a method of protecting larger tracts of resource lands based on community input.</p>
<p><b>FR-P16. Compatible Uses.</b> Lands adjacent to areas designated as Timberlands should be planned for uses compatible with timber management, including timber harvesting activities.</p>
<p><b>FR-P19. Maintain Public Roads.</b> The County shall maintain public roads and drainage facilities to support log and forest products transportation.</p>

**Chapter 5. Infrastructure**

<p><b>IS-PX. Out of Area Service to Address Threats to Public Health.</b> Encourage the Humboldt LAFCo to amend its policies and procedures to allow local agencies to provide new or extended services outside jurisdictional boundaries and outside spheres of influence to respond to existing or impending threats to the public health or safety, consistent with Government Code 56133, without requiring an annexation agreement.</p>
<p><b>IS-P20. On-Site Sewage Disposal Requirements.</b> Maintain regulations governing construction and maintenance of on-site sewage disposal systems to protect health and safety and to reflect changes in state law and advances in treatment technologies. Recognize and allow the use of alternative onsite sewage disposal systems that meet state standards.</p>
<p><b>IS-P21. Parks and Recreation Service in Urban Development Areas.</b> Encourage and support special districts to provide neighborhood parks and recreation services within Urban Development Areas.</p>

**Chapter 7. Circulation**

<p><b>C-P4. Mitigation Measures.</b> Development with potentially significant circulation impacts as determined by CEQA review shall may be conditioned to proportionally mitigate such impacts through payment of impact fees, construction of on- and off-site improvements and dedication of rights-of-way or a combination of impact fees, improvements and dedications.</p>
<p><b>C-P5. Level of Service Criteria.</b> The County shall strive to maintain Level of Service C operation on all roadway segments and intersections, except for of U.S. 101, where Level of Service D shall be acceptable. Level of Service improvements for automobiles should not adversely affect Level of Service and/or Quality of Service for other modes of transportation, if possible.</p>
<p><b>C-P8. Coordination Between County Agencies.</b> County Public Works shall coordinate with Community Development Services and consider suggestions from other county departments to encourage uniform implementation of the Circulation Element and County-Wide Transportation Plan.</p>

<p><b>C-Px. Circulation Planning for Bicycles, Pedestrians and Transit.</b> Circulation planning and project review shall include an assessment for bicycle, pedestrian and public transit access.</p>
<p><b>C-P9. Acceptance of Roads into the County Maintained Road System.</b> Circulation Element roads, as specified by the County-Wide Transportation plan shall be recommended to the Board of Supervisors for inclusion into the County Maintained Road System. Other roads shall not be recommended for acceptance into the County Maintained Road System unless an exception for public interest is supported by Public Works and adequate funding for the future maintenance of the road and its associated facilities is provided.</p>
<p><b>C-P10. Rail Rights-of-Ways</b> All Contiguous rail rights-of-way currently held by the North Coast Railroad Authority, and those along the former Annie and Mary Railroad rail corridor between Arcata and Blue Lake shall be planned Railroad in the Land Use Element.</p>
<p><b>C-P13. Prioritization of Investments.</b> Use objective criteria consistent with this Plan that can be applied uniformly and countywide to prioritize transportation capital and maintenance expenditures. Work to reduce overall deferred maintenance liability. Subject to state law, maintenance of existing roads shall be a <u>priority</u>.</p>
<p><b>C-P17. Highway Improvements.</b> Encourage state and federal highway improvements that promote safety and connectivity for all users, especially for communities with highway arterials.</p>
<p><b>C-P19. Best Management Practices for Road Grading.</b> New development subject to The County shall periodically update its grading ordinance shall-use to assure it is using best management practices prevent soil erosion and minimize impacts to watersheds from grading activities.</p>
<p><b>C-P27. Right-of-Way Design Standards.</b> The County shall develop and include in the County-Wide Transportation Plan rRight-of-way design standards shall incorporate the needs of all users consistent with urban, suburban, rural or remote community character. The County shall develop incentives for development of multi-modal facilities to offset any potential loss of developable land.</p>
<p><b>C-P28. Landscape Buffer Strips.</b> The County Wide Transportation Plan shall provide landscape buffer strip standards as part of the road cross-section standards and according to the context of urban, suburban, rural and remote. Landscape buffer strips should be used, where feasible, to segregate pedestrian walkways from arterial and collector roadways.</p>
<p><b>C-P30. On-Street Parking.</b> Design on-street parking to minimize conflicts with <u>all users</u> consistent with the <u>County-Wide Transportation Plan</u>. Where appropriate, creative on-street parking arrangements such as parking pockets or bays shall be considered to improve design flexibility.</p>



<p><b>C-P32. Traffic Calming.</b> Use traffic calming measures, where <u>feasible and appropriate</u>, as a means of improving safety for <u>all users</u>. Traffic calming measures <u>may</u> include, but are not limited to, roundabouts, chicanes, curb extensions, and traffic circles.</p>
<p><b>C-P35 Preservation of Railroad Right-of-Ways.</b> The County shall work to preserve railroad rights-of-way as a contiguous corridor <u>for rail and other public transportation uses</u>.</p>
<p><b>C-P36. Develop a Regional Trails System.</b> Support efforts to establish and connect regional trails, pThere is no implementation measure to illustrate how GP-10 would be implemented particularly in the greater Humboldt Bay and lower Mad River area, Eel River Valley, along the Avenue of the Giants and in the Klamath-Trinity area. The System should include the California Coastal Trail system and consist of multi-use trails where feasible.</p>
<p><b>C-P37. Encourage Bicycle and Pedestrian-Friendly development:</b> Incentives should be given to developers who provide non-motorized facilities that connect neighborhoods in a design appropriate to the character of those neighborhoods.</p>
<p><b>C-P38. Channel Maintenance.</b> Support continued maintenance of harbor channels to provide deep water access to existing and planned port facilities.</p>
<p><b>C-P39. Commercial Fishing Facilities.</b> Support the improvement and modernization of facilities that provide support and access to markets for the commercial fishing industry.</p>
<p><b>C-P40. Public Infrastructure Supporting Private Investment.</b> Support investments in public infrastructure that increase readiness and facilitate private initiatives and investment into port enterprises such as marine-dependent industrial use, boat building and repair facilities, fleet service facilities, tourism, recreation, and fish processing facilities.</p>
<p><b>C-P41. Marine Transportation.</b> Encourage marine transport options, <u>and associated facilities</u>.</p>
<p><b>C-P42. Re-establishing Regional Rail Service.</b> Support and encourage rail service in and out of the county and connected to other parts of the state <u>and the national rail system</u>. Public investment to re-establish regional rail service should be contingent on a private or public demand for sustained rail service and an analysis of net benefits to the County's economy, transportation systems, and environment.</p>
<p><b>C-P44. Expansion of Airline Service.</b> The County shall work to sustain and expand commercial passenger airline and freight service to and from the County consistent with the Airport Master Plan and the economic development goals of the County.</p>

<p><b>C-P45. Commercial Areas.</b> <i>Where feasible,</i> commercial projects should be encouraged to develop inter-connecting traffic features with other commercial projects.</p>
<p><b>C-P47. Frontage Improvements.</b> As properties are developed, all road frontages of the property shall be improved to the appropriate standard for the road according to the County-Wide Transportation Plan. Exceptions may be granted by the Planning Commission. Current standards will be used in evaluating frontage improvements until they are superseded by the approved Countywide Transportation Plan.</p>
<p><b>C-PX8. Discretionary Road Funds:</b> First priority for discretionary road funds shall be used to address deferred maintenance.</p>

**Chapter 8. Housing**

<p><b>H-P3. Development of Properties in the Residential Land Inventory.</b> The County shall encourage development of parcels in the residential land inventory for the current planning period at targeted residential density.</p>
<p><b>H-P6. Flexibly Apply Development Standards to Low Income Housing.</b> The County shall support the flexible application of development standards through a streamlined permit process for housing for lower income affordability categories and special needs populations.</p>
<p><b>H-P7. Use of Surplus County-owned Property.</b> The County shall consider using surplus County owned property for development or financing of housing for low income and special need populations. County-owned parcels developed with affordable housing shall be in close proximity to commercial areas and connected to them by pedestrian facilities and public transit</p>
<p><b>H-P10. Contributions to Infrastructure and Service Development.</b> Market-rate housing pays its fair share of infrastructure and public service costs. Housing that has long-term affordability covenants and restrictions that require units to be available to, and occupied by, persons or families of low, very low or extremely low income at affordable housing costs for at least 20 years may be eligible for subsidies to pay for applicable infrastructure and public service costs.</p>
<p><b>H-P12. Residential Subdivision Permit Process.</b> The County shall maintain an efficient, streamlined and predictable permitting process designed for residential subdivisions that meet the goals and policies of this Element.</p>
<p><b>H-P13. Expedited Residential Subdivision Review in Housing Opportunity Zones.</b> The County shall streamline environmental review of residential subdivisions in Housing Opportunity Zones by establishing standardized maximum thresholds of significance.</p>

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<p><b>H-P29. Reduce and Avoid Impacts to Biological Resources.</b> Consistent with the mitigation measures in the Supplemental Environmental Impact Report (SCH#2009022077) the County shall refer all building permit applications that would result in the withdrawal of water from perennial streams or rivers, or from wells within 100' of a perennial stream or river, or from springs within 100' of a perennial stream or river to the Department of Fish and Wildlife (DF&amp;W) for comments and recommendations.</p>
<p><b>H-P30. Conservation of Affordable Housing Damaged or Displaced by Indoor Marijuana Grows.</b> The County shall earmark a minimum twenty percent (20%) of the net revenue from any future excessive energy tax toward programs for conservation of affordable housing.</p>
<p><b>H-P31. Maintaining an Adequate Land Inventory.</b> Unless written findings are made pursuant to Government Code 65863 supported by substantial evidence, the County shall not allow a reduction in residential units in the residential land inventory below that specified in the current Regional Housing Need Allocation</p>

**Chapter 9. Economic Development**

<p><b>ED-P3. Affordable Housing.</b> Promote housing <del>at-a-price-commensurate</del> with income levels as reflected in the County Regional Housing Needs Allocation and a transportation system to provide efficient connectivity between housing and places of employment to minimize commute travel times and distances.</p>
<p><b>ED-P7. Broadband Internet.</b> Support broadband improvements necessary to maintain the County's business competitiveness and serve remote communities.</p>
<p><b>ED-P8 Public Infrastructure.</b> Assist local service providers in the pursuit of state and federal funding and development of land use assessment, rates and connection fee programs to upgrade and enhance <u>infrastructure, including water, wastewater and recreational</u> facilities.</p>
<p><b>ED-P9. Freight Mobility.</b> <u>Support pursuit of</u> financial and technical solutions to <u>improve</u> interstate truck <u>and rail</u> access.</p>
<p><b>ED-P10. Rail.</b> Support protection for the NCRA right-of-way and assets to preserve the ability to re-open the line in response to a demand for rail service.</p>

<p><b>ED-P11. Port Development.</b> Support efforts to maintain and develop the port for <u>shipping</u>, the fishing industry, <u>aquaculture</u>, <u>renewable energy</u>, <u>coastal-dependent</u> and <u>and-associated</u> industries.</p>
<p><b>ED-P18. Higher Education.</b> Support College of the Redwoods and Humboldt State University education and training programs that provide residents with the skills and knowledge to qualify for living wage careers and enhance the competitive edge of the industries in our region. Support K-12 educational programs that prepare students for careers in regional industries.</p>
<p><b>ED-P5X. Telecommuting and Workforce Development.</b> Promote and seek resources to ensure that the county has a broadband infrastructure that encourages economic and workforce development and promotes telecommuting.</p>

**Chapter 10. Conservation and Open Space**

<p><b>CO-P1x. Transfer of Development Rights.</b> Research and develop, if feasible, a voluntary transfer of development rights program as a method of protecting resource lands and open space based on community input.</p>
<p><b>CO-P1xx. Open Space Acquisition.</b> The County seek consider opportunities to acquire high value open space lands, including community forests, and open space conservation easements from willing sellers.</p>
<p><b>CO-P4. Community Separation.</b> Maintain separation of urbanized communities through appropriate land use designations and zoning density. Avoid merging urban development boundaries of adjacent communities.</p>
<p><b>CO-P7. Encourage Private Outdoor Recreation.</b> Encourage private acquisition, development, and management of compatible outdoor recreational services and facilities as a means to generate economic returns for the landowner from conservation and open space lands where such recreational uses <del>do not reduce</del> do not significantly detract from the agricultural capability or timber productivity of lands planned and zoned for agriculture or timber.</p>
<p><b>CO-Px4. Public Recreation.</b> Support acquisition, development and management of parklands and trails primarily in locations that are highly accessible to the public in order to serve the outdoor recreation and ADA needs of current and future residents, and where such uses do not reduce the agricultural capability, timber productivity and ecological services on open space lands.</p>

<p><b>BR-P4. Development within Stream Channels.</b> Development within stream channels shall be permitted when there is no lesser environmentally damaging feasible alternative, and where the best feasible mitigation measures have been provided to minimize adverse environmental effects. Development shall be limited to essential, non-disruptive projects as listed in Standard BR-S6 -Development within Stream Channels.</p>
<p><b>BR-P6. Development within Streamside Management Areas</b> Development within Streamside Management Areas shall only be permitted where mitigation measures (Standards BR-S8 - Required Mitigation Measures, S9 - Erosion Control, and S10 - Development Standards) have been provided to minimize any adverse environmental effects, and shall be limited to uses as described in Standard BR-S7 - Development within Streamside Management Areas.</p>
<p><b>BR-P9. Invasive Plant Species.</b> The County shall cooperate with public and private efforts to manage and control noxious and exotic invasive plant species. The County shall recommend measures to minimize the introduction of noxious and exotic invasive plant species in landscaping, grading and major vegetation clearing activities.</p>

<p><b>SR-PX Working Landscapes.</b> Recognize the scenic value of resource production lands.</p>
<p><b>SR-P1. Development in Mapped Scenic Areas.</b> In mapped scenic areas, new discretionary and ministerial development shall be consistent with and subordinate to natural contours, hilltops, tree lines, bluffs and rock outcroppings. Visible disturbance and interruption of natural features shall be minimized to the extent feasible.</p>
<p><b>SR-PXX Vandalism of billboards.</b> If vandalism of legal nonconforming billboards requires repair or reconstruction, the billboard shall not lose its legal, nonconforming status, consistent with Humboldt County Zoning Code.</p>

**Chapter 11. Water Resources**

<p><b>WR-P2. Protection for Existing Surface and Groundwater Uses.</b> Impacts on existing Basin-Plan beneficial water uses shall be considered and mitigated during discretionary review of land use permits shall include mitigations for significant surface or groundwater resource impacts.</p>
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<p><b>WR-P4.Critical Municipal Water Supply Areas.</b> The Board of Supervisors shall designate <del>all or portions of watersheds</del> specific municipalities as “Critical Water Supply Areas” if cumulative impacts from land uses within the area have the potential to significantly impact the quality or quantity of municipal water supplies. Water resources within Critical Water Supply Areas shall be protected by the application of specific standards for such areas.</p>
<p><b>WR-P5.Critical Watershed Water Supply Areas.</b> The Board of Supervisors shall designate <del>all or portions of watersheds as</del> “Critical Water Supply Areas” <del>Watersheds</del> if cumulative impacts from <del>existing or planned</del> land <del>and water resource</del> uses within the area have been found via CEQA review to have the potential to possibly create significant environmental impacts to threatened or endangered species including Chinook salmon, Coho salmon or steelhead. <del>Land and</del> Water resources within Critical Water Supply Areas <del>Watersheds</del> shall be protected by the application of specific standards for such areas to avoid the unauthorized take of threatened or endangered species.</p>
<p><b>WR-P6. Subdivisions Water Supply for Residential Development.</b> Any subdivision of land for residential development shall be conditioned to require evidence of sufficient water supply during normal and drought conditions to meet the projected demand associated with the proposed subdivision for residential development. Sufficient water supply shall include the requirements of the proposed subdivision and existing and planned future uses. Written service letters from a public water system written in conformance with this policy is sufficient evidence. Subdivisions to be served through on-site water supplies or private water systems must provide evidence of sufficient water supply to the County Department of Environmental Health.</p> <p><b>There is no implementation measure to illustrate how GP-P10 would be implemented.</b></p>
<p><b>WR-Pxx. Funding.</b> Coordinate with local, state and federal agencies, and conservation and watershed restoration related organizations, to identify and obtain sources of funding for water quality enhancement, fish passage projects, stormwater <b>pollution management, and water conservation efforts.</b></p>
<p><b>WR-PxI.</b> Requirements for Water Storage in Flow Impaired Low Water Supply Areas, Watersheds. New development not served by a public water system that seeks to rely upon surface water shall install water storage capable of providing 100 percent of the necessary water storage volume for the summer low-flow season (e.g. July-August-September). A forbearance agreement prohibiting water withdrawals during low-flow season shall be included as a performance standard for the project.</p>

<p><b>WR-P8. Erosion and Sediment Discharge.</b> Ministerial and discretionary projects requiring a grading permit shall comply with performance standards adopted by ordinance in the County Grading Ordinance and/or conditioned to minimize erosion and discharge of sediments into surface runoff, drainage systems, and water bodies consistent with best management practices, adopted Total Maximum Daily Loads (TMDLs), and non-point source regulatory standards.</p>
<p><b>WR-P10. Project Design.</b> Development should be designed to compliment and minimize significant adverse impacts to not detract from the function of rivers, streams, ponds, wetlands, and their setback areas.</p>
<p><b>WR-P11. Small and Micro Hydroelectric.</b> , If during a CEQA review for a Conditional Use Permit for a small hydroelectric development (where less than 5 kilowatts of power is generated) that includes plans for an off-site power destination/use, the potential for impacts to surface water flows, aquatic species, and habitat are discovered, such impacts shall be adequately mitigated to be in conformity with state and federal permits and standards.</p>
<p><b>WR-P12. Groundwater Quality Protection.</b> Commercial and industrial discretionary uses shall be evaluated for their potential to contaminate groundwater resources, and mitigated as necessary.</p>
<p><b>WR-Px7. Rain Catchment Systems.</b> Encourage the installation of rain catchment systems to support domestic and outdoor water needs during low-flow summer months.</p>
<p><b>WR-P18. Watershed and Community Based Efforts.</b> Support the efforts of local community watershed groups to promote water conservation and restoration.</p>
<p><b>WR-P20. State and Federal Watershed Initiatives.</b> Support Acknowledge implementation of state and federal watershed initiatives such as the Total Maximum Daily Loads (TMDLs), the North Coast Regional Water Quality Control Board's (NCRWQCB) Watershed Management Initiative, the National Marine Fisheries Services and Department of Fish and Game coho recovery plans and the California Non-Point Source Program Plan.</p>



<p><b>WR-P25. New Water Diversion Projects.</b> Review and make recommendations on significant new water diversion projects to ensure that they do not reduce the replenishment rate of in-stream gravel, taking into account the impact the projects would have on local mineral supplies in Humboldt County.</p>
<p><b>WR-P27. County Needs.</b> Any consideration of exporting additional water resources shall place primary priority upon the benefit of and need for the water resources in the county and shall ensure that water needed by water users and natural resources will not be exported outside the county.</p>
<p><b>WR-P28. Public Trust Resources and Interests.</b> The County should support shall advocate that dam relicensing projects by the P.U.C. , the F.E.R.C., and the State Water Resources Control Board balance redress the historical over-emphasis on development values (electric power, flood control, and water supply) with at the expense of non-developmental values (environmental resource protection, habitat restoration, and water quality).</p>
<p><b>WR-P29.Public Input.</b> The County shall advocate for the relicensing applicant to sponsor a participatory process involving all affected stakeholders prior to the submittal of a final relicensing application to the Federal Energy Regulatory Commission.</p>
<p><b>WR-P29x Implementation of NPDES Permit.</b> Implement and comply with the National Pollutant Discharge Elimination Systems (NPDES) Permit issued by the State Water Resources Control Board to the designated portions of the County.</p>
<p><b>WR-P31. Downstream Stormwater Peak Flows.</b> Peak downstream stormwater discharge shall not exceed the capacity limits of off-site drainage systems or cause downstream erosion, flooding, habitat destruction, or impacts to wetlands and riparian areas. New development shall demonstrate that post-development peak flow discharges will mimic natural flows to watercourses and avoid impacts to Beneficial Uses of Water.</p>

**WR-P32. New Drainage Facilities.** Where it is necessary to develop additional drainage facilities, they shall be designed to be as natural in appearance and function as is feasible. All drainage facilities shall be designed to maintain maximum natural habitat of streams and their streamside management areas and buffers. Detention/retention facilities shall be managed in such a manner as to avoid reducing stream flows during critical low-flow periods.

**WR-P33. Restoration Projects.** The County shall encourage restoration projects aimed at reducing erosion and improving habitat values in Streamside Management Areas and wetlands while maintaining Agricultural Resource values.

**WR-P34. Commercial and Industrial Activities.** For commercial and industrial development, the need for drainage facilities shall be as a result of a referral by the Land Use Division of Public Works and installed/constructed on a case by case basis to the satisfaction of the Land Use Division of Public Works per the County Grading, Subdivision and LID ordinances. No such requirements are to be applied to forests or ranchlands.

**WR-P40. Fish Passage Designs.** Work with federal and state agencies and local watershed restoration groups to retrofit existing drainage and flood control structures and design new structures to facilitate fish and other wildlife passage in partnership with federal and state agencies.

### **Chapter 13. Noise**

**N-P1. Minimize Noise from Stationary and Mobile Sources.** Minimize stationary noise sources and noise emanating from temporary activities by applying appropriate standards for average and short-term noise levels during permit review and subsequent monitoring.

**N-P4. Protection from Excessive Noise.** Protect persons from existing or future excessive levels of noise which interfere with sleep, communication, relaxation, health or legally permitted use of property.

## **Chapter 14. Safety**

<p><b>S-P1. Reduce the Potential for Loss.</b> Plan land uses and regulate new development to reduce the potential for loss of life, injury, property damage, and economic and social dislocations resulting from natural and manmade hazards, including but not limited to, steep slopes, unstable soils areas, active earthquake faults, wildland fire risk areas, airport influence areas, <u>military operating areas</u>, flood plains, and tsunami run-up areas.</p>
<p><b>S-P2. Coastal Zone Hazards.</b> Development within the coastal zone shall minimize risks to life and property in areas of high geologic, <u>tsunami</u>, flood, and fire hazard; assure stability and structural integrity; and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding areas or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.</p>
<p><b>SPX7. Military Operating Areas.</b> Provide notification and project information to the military for discretionary development projects within <u>military airspace</u> operating areas as may be required by the California Government Code.</p>
<p><b>S-P6. Structural Hazards.</b> The County shall protect life and property by applying and enforcing state adopted building codes and Alquist-Priolo requirements to new construction.</p>
<p><b>S-P7. Improved Information.</b> Encourage and support more detailed scientific analysis of Cascadia Subduction Zone earthquake risks, probabilities, and anticipated effects.</p>
<p><b>S-P8. Earthquake Mitigation Planning.</b> The potential for a local earthquake in excess of magnitude 9.0 (Richter scale) shall be considered in disaster planning, risk assessment, and pre-disaster mitigation efforts.</p>
<p><b>S-PX1. Site Suitability.</b> New development may be approved only if it can be demonstrated that the proposed development will neither create nor significantly contribute to, or be impacted by, geologic instability or geologic hazards.</p>
<p><b>S-P11. Flood Plains.</b> Agricultural lands that are in mapped floodplains shall be retained for use in agriculture.</p>

**S-PX2. Prohibition of Residential Subdivisions within Floodplain.** The creation of new parcels that increase residential density wholly within the 100 year floodplain, as identified in the most recent FEMA flood insurance rate maps, shall be prohibited unless the Board of Supervisors makes specific findings that the potential for loss of life and property can be reduced to less than significant levels.

**S-PX3. Construction Within Special Flood Hazard Areas.** Construction within a floodplain identified as the 100-Year Flood Boundary on FEMA's Flood Insurance Rate Map shall comply with the County's Flood Damage Prevention Regulations. Fill in the floodplain shall only be allowed if it can be demonstrated that the fill will not have cumulative adverse impacts on or off site and such fill shall not be detrimental to productive farm land, and is otherwise in conformance with the County's Flood Damage Prevention Regulations

**S-PX4. Development on, or Adjacent to, Coastal Bluffs and Beaches.** Allow development in areas immediately adjacent to coastal bluffs and beaches only if it can be demonstrated by a certified engineering geologist that wave action, storm swell, tsunami inundation, and projected sea level rise using the best available scientific information and at the time of review, are not a hazard to the proposed development.

**S-P13. Subdivision Design in High and Very High Fire Hazard Zones.** Subdivisions within State Responsibility Area (SRA) high and very high fire severity classification areas shall explicitly consider designs and layout to reduce wildfire hazards and improve defensibility; for example, through clustering of lots in defensible areas, irrigated green belts, water storage, perimeter roads, roadway layout and design, slope development constraints, fuel modification plans, and vegetation setbacks.

**S-P25. Hazardous Industrial Development.** Hazardous industrial development may be permitted when:

A. It includes mitigation measures sufficient to offset increased risks to adjacent human populations and the environment; and,

Increased risks to adjacent human populations and the environment have been adequately mitigated by approved disaster response plans. (See definition of "hazardous industrial development" in Standards Section below).

**S-P26. Hazardous Waste.** Eliminate the use of toxic materials within Humboldt County, where feasible, and require the reduction, recycling, and reuse of such materials, to the greatest extent possible, where complete elimination of their use is not feasible. Require new development which may generate significant quantities of hazardous wastes to provide a plan for disposal which emphasizes on-site treatment, neutralization, and recycling.

**S-P30. Tsunami Ready Program.** The County shall support efforts of low-lying coastal communities to attain Tsunami Ready™ status, as developed by the National Weather Service.

## **Chapter 12. Energy**

**E-P2. Oil and Gas Development.** Oil and gas development shall be permitted consistent with the following:

- A. The development is performed safely and is consistent with the geologic conditions of the well site.
- B. New or expanded facilities related to such development are consolidated, to the maximum extent feasible and legally permissible, unless consolidation will have adverse environmental consequences and will not significantly reduce the number of producing wells, support facilities, or sites required to produce the reservoir economically and with minimal environmental impacts.
- C. Such development will not cause or contribute to subsidence hazards unless it is determined that adequate measures will be undertaken to prevent damage from such subsidence. Hydraulic fracturing for release and recovery of hydrocarbons is prohibited.

**E-P7. County Government Energy Consumption.** The County government shall reduce building and transportation energy consumption by implementing energy conservation measures and purchasing renewable energy and energy efficient equipment and vehicles whenever cost-effective. Conservation and renewable energy investments should be planned and implemented in accordance with performance-based action plans and County Greenhouse Gas Emission Reduction goals.

**E-P9. Electrical Transmission.** Promote PG&E funded capacity upgrades to electric distribution lines to facilitate distributed renewable energy production and electricity export from the county.

**E-P9x. Electricity Buyback.** Support revisions to the electricity buyback program that encourages more distributed local generation and more equitably compensates such generation.

**E-P10. Transportation Management Plans.** Major commercial, business, or industrial, facility developments shall be required to submit a transportation management plan that addresses energy conservation measures such as connectivity to alternative transportation modes; preferential parking for carpools, vanpools, motorcycles, mopeds, and bicycles; shuttle services; alternative fueling stations; transit passes; bike lockers; and locker-room facilities. Develop incentives for projects not deemed as major that incorporate such energy conservation measures.

<p><b>E-P13. Water Efficiency.</b> Promote the efficient use of water in residences, businesses, industries, and agriculture.</p>
<p><b>E-P14. Incentives for Using Alternative Energy.</b> Encourage the use of renewable energy and environmentally preferable distributed energy generation systems in the county.</p>
<p><b>E-P15. Wind Renewable Energy Overlay Zones.</b> Develop renewable <del>develop</del> a wind energy overlay zones based on community input to protect <del>potential-wind-energy</del> the unique value of sites that are identified as having substantial wind renewable energy potential and/or will be critical for renewable energy infrastructure while still allowing uses permitted in the underlying zone.</p>
<p><b>E-PX2. Sustainable Biomass Energy Production.</b> Coordinate with local agencies, communities, and landowners to develop biomass energy plans that are consistent with forest management, hazardous fuels reduction, and restoration needs and priorities.</p>
<p><b>E-PX3 Residential Design “for Solar Access”.</b> Proposed single-family residential structures should be designed to maximize solar access, energy conservation and passive solar energy generation. Solar access potential should be evaluated based on each climate zone within the County as established by the National Weather Forecast Center in Eureka.</p>

## **Chapter 15. Air Quality**

<p><b>AQ-P1. Reduce Length and Frequency of Vehicle Trips.</b> Reduce the length and frequency of vehicle trips through land use and transportation policies by encouraging mixed-use development, compact development patterns in areas served by public transit, and active modes of travel.</p>
<p><b>AQ-P2. Reduce Localized Concentrated Air Pollution.</b> Reduce or minimize the creation of “hot spots” or localized places of concentrated automobile emissions.</p>
<p><b>AQ-P3. Fireplace and Woodstove PM<sub>10</sub> Emissions.</b> Support incentives to minimize emissions from fireplaces and woodstoves.</p>
<p><b>AQ-P4. Construction and Grading Dust Control.</b> Dust control practices on construction and grading sites shall achieve compliance with NCAQMD fugitive dust emission standards.</p>

<p><b>AQ-P5. Air Quality Impacts from New Development.</b> During environmental review of discretionary permits, reduce emissions of air pollutants from new commercial and industrial development by requiring feasible mitigation measures to achieve the standards of the NCAQMD.</p>
<p><b>AQ-P6. Buffering Land Uses.</b> During environmental review of discretionary commercial and industrial projects, consider the use of buffers between new sources of emissions and adjacent land uses to minimize exposure to air pollution.</p>
<p><b>AQ-P7. Interagency Coordination.</b> “Coordinate with the NCAQMD early in the permit review process to identify expected regulatory outcomes and minimize delays for projects involving: . . . “</p>
<p><b>AQ-P8. Reduce Air Quality Impacts from Wildfires.</b> Support and encourage fire suppression of wildfires that may have an acute air quality health impact on local population centers.</p>
<p><b>AQ-Px. Review of Projects for Greenhouse Gas Emission Reductions.</b> The County shall evaluate the GHG emissions of new large scale residential, commercial and industrial projects <u>for compliance with state regulations</u> and require feasible mitigation measures to minimize GHG emissions.</p>
<p><b>AQ-P11. Forest Sequestration and Biomass Energy.</b> Provide incentives for increased carbon sequestration on forest lands and encourage the reduction of smoke production through the utilization of excess forest biomass for sustainable energy generation and other uses.</p>
<p><b>AQ-P12. Solar Electric System Capacity.</b> Encourage and provide incentives to increase solar-electric capacity in residential, commercial, and industrial sectors.</p>
<p><b>AQ-P13. Energy Efficient Building Design.</b> Encourage and provide incentives for construction of buildings and energy saving measures beyond Title 24 requirements for residential and commercial projects.</p>
<p><b>AQ-P15. Preservation and Replacement of On-site Trees.</b> Projects requiring discretionary review should preserve large trees, where possible, and mitigate for carbon storage losses attributable to significant removal of trees.</p>

## Responses to Humboldt Coalition for Property Rights - Letter C4

**Comment C4-1:** This comment states that the RDEIR fails to adequately address the environmental impacts of “illegal cannabis cultivation” and “regulated commercial cannabis production” relating to the Commercial Medical Marijuana Land Use Ordinance, and the RDEIR does not “analyze and discuss the economic and equitable impacts of the net loss of industrial zoned lands for commercial and industrial uses other than for the cannabis industry.”

**Response to Comment C4-1:** Illegal cannabis cultivation is addressed in the environmental baseline sections of Chapter 3.2, Agricultural and Timber Resources, Chapter 3.3 Utilities and Services Systems, and Chapter 3.12, Air Quality of the RDEIR. Regulated commercial cannabis production is described in the environmental baseline discussion of Chapter 3.2, Agricultural and Timber Resources.

As quoted in this comment, this “Program EIR is a first-tier environmental document that assesses and documents the broad environmental impacts that can be expected to occur from the adoption and implementation of the General Plan Update.” Other than Policy UL-P21, Cannabis Cultivation, and Implementation Measure UL-IM15, Cannabis Cultivation and Dispensary Ordinance, there are no other policies, standards, or implementation measures in the GPU that relate to cannabis cultivation, processing, or manufacturing. The significance of the production and sale of medicinal and illicit cannabis to Humboldt County’s economy is discussed in the Economic Development Element. In addition, Housing Element Policy H-P30, Conservation of Affordable Housing Damaged or Displaced by Indoor Marijuana Grows, directs the County to earmark revenue from any future excessive energy tax toward programs for conservation of affordable housing. However, the Housing Element is included in the GPU for reference purposes, but is not considered in the RDEIR as it was evaluated in a separate environmental document.

UL-P21 and UL-IM15 were recommended by the Planning Commission in 2012, prior to changes in state law relating to commercial medical or recreational cannabis, and specify that medical cannabis cultivation shall be regulated by ordinance that protects the health, safety and welfare and that ensures the cultivation and dispensing sites are compatible with neighboring uses. In 2016, Humboldt County approved the Commercial Medical Marijuana Land Use Ordinance, largely implementing UL-P21 and UL-IM15, referenced on Page 3.2-8, of Chapter 3.2, Agricultural and Timber Resources. The environmental impacts of the Commercial Medical Marijuana Land Use Ordinance were analyzed in the Mitigated Negative Declaration for Medical Marijuana Land Use Ordinance – Phase IV – Commercial Cultivation of Cannabis for Medical Use (SCH Number: 2015102005).

Section 3.0, Baseline Environmental Conditions Assumed in the RDEIR, states that “comprehensive and reliable data regarding baseline conditions related to the pervasive and unregulated development of illicit cannabis cultivation in Humboldt



County is still not available. Although this RDEIR attempts to summarize some of the data that is available in Chapter 3.2 - Agriculture and Timber Resources, future regulation of cannabis cultivation, processing, manufacturing, or distribution is not within the scope of the draft GPU and potential impacts of such a regulatory program are not analyzed in this RDEIR." The County of Humboldt is in the process of developing a separate Environmental Impact Report for ordinances regulating commercial cannabis industry development in accordance with rapidly evolving state and federal law." Humboldt County has initiated a project to amend the Humboldt County Code regulating cannabis land use activities. An Environmental Impact Report (EIR) is currently being prepared by Humboldt County to evaluate the environmental effects of proposed changes to the County's Commercial Cannabis Land Use Ordinances (SCH Number: 2017042022).

The comment also states that the RDEIR does not analyze and discuss the economic and equitable impacts of the net loss of industrial zoned lands for commercial and industrial uses other than for the cannabis industry. According to CEQA Guidelines Section 15382, "(a)n economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant."

For the comment relating to the environmental impacts of "illegal cannabis cultivation" and "regulated commercial cannabis production," the RDEIR is intended to disclose the possible environmental impacts from approving the policies, standards, and implementation measures in the General Plan Update and the population growth that is projected to occur during the General Plan Update planning period. This comment does not address specific impacts or mitigation measures in the RDEIR. Therefore, no further response is required under CEQA. Regarding economic and equitable impacts of the net loss of industrial zoned lands for commercial and industrial uses other than for the cannabis industry, the comment does not identify physical change that could have an effect on the environment.

**Comment C4-2:** This comment states that the Notice of Preparation (NOP) was circulated in 2007, and is now out of date particularly for cannabis impacts. The comment also states that the NOP was circulated prior to the recommendations of the Planning Commission in 2012 and the tentative approval by the Board of Supervisors of the draft General Plan Update in 2016, which could create confusion for the public.

**Response to Comment C4-2:** See response to comment C2-2 for a discussion of how the RDEIR addresses the environmental setting information contained in the RDEIR and the information that has been updated since release of the Notice of Preparation on January 22, 2007, and the Draft Environmental Impact Report, April 2, 2012.

Regarding the date of the NOP and potential confusion regarding the project that is under review, RDEIR Section 1.3.1, Scoping the Issues To Be Discussed in the EIR, describes the NOP and scoping process, the review of the General Plan Update by the Planning Commission from 2007 to 2012, and the review of the General Plan Update by the Board of Supervisors from 2012 through 2017 and concludes with the statement that

“(t)he Board of Supervisors held 66 public hearings on the Project and Plan alternatives from June, 2012 through March, 2016, to take straw votes and refine the Planning Commission Approved Draft GPU, resulting in the Board of Supervisors 2016 Markup Draft which is the Project being considered in this EIR.” RDEIR Section 1.3.2, Prepare and Distribute Revised Draft Program EIR, states that the RDEIR was prepared “to address the changes to the Project made by the Board of Supervisors since June, 2012, and to address the comments made on the 2012 Draft EIR for the Planning Commission Approved Draft” and that the RDEIR “also incorporates significant new information which became available after 2012.” Chapter 2, Project Description, clearly indicates in the introduction that the RDEIR analyzes the Board of Supervisors Markup Draft from October 19, 2015, and that the Board of Supervisors made modifications, additions, and deletions to that draft plan recommended by the Planning Commission.

**Comment C4-3:** This comment expresses dissatisfaction with proposed Mitigation Measure 3.11.3.2 which proposes new language for Standard **BR-S11. Wetlands Defined**. The comment claims the proposed new language is unnecessary and will cause confusion.

**Response to Comment C4-3:** See Response to Comment C3-1 above.

**Comment C4-4:** This comment references California Public Resources Code Section 21083(b) and 21083 (b)(3), which state that “(t)he guidelines shall specifically include criteria for public agencies to follow in determining whether or not a proposed project may have a “significant effect on the environment...and... shall require a finding that a project may have a “significant effect on the environment” if “...” (t)he environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly.” The comment further states that the RDEIR does not analyze the social and economic impacts of the majority of GPU policies, goals, and implementation measures.

**Response to Comment C4-4:** The RDEIR evaluates the environmental impacts expected to occur from adoption and implementation of the General Plan Update. Analysis of the social and economic impacts of the GPU is not required by CEQA. The comment does not identify environmental effects of the GPU that will cause substantial adverse effects on human beings. Therefore, no further response is required under CEQA.

**Comment C4-5:** This comment suggests that the majority of the policies, goals and implementation measures of the Economic Development Element stand to have effects on the environment and human residents.

**Response to Comment C4-5:** The RDEIR project description describes the Economic Development Element as one of six optional elements included in the GPU that outlines the County’s economic development strategy and provides relevant supporting policies, and generally describes the policies at the top of Page 2-20. Policies within the Economic Development Element generally promote and support a stable, and growing local economy, seek to acquire funding for infrastructure and workforce training, and to plan for demographic changes and an appropriate supply of industrial and commercial land. The RDEIR analyzes reasonably foreseeable environmental effects

that are related to the Economic Development Element in terms of population and employment growth during the planning period, planned land uses, and infrastructure. The RDEIR also analyzes how relevant General Plan Update policies would lessen potential environmental effects of the GPU. Chapter 3.7, Hazards and Hazardous Materials references Policy ED-P16, Brownfields, in Impact 3.7.4.1: Hazardous Materials, and how it would direct the County to pursue and distribute funding and technical assistance to assess, clean up, and reuse Brownfields as well as streamline the regulatory review for proposed development in commercial and industrial zoned Brownfields. This comment does not address specific impacts or mitigation measures in the RDEIR. Therefore, no further response is required under CEQA.

**Comment C4-6:** This comment states that a number of GPU policies would place regulatory constraints on both private and public lands and the RDEIR fails to address how these regulatory constraints may or may not impact the environment, the economy, or the people of Humboldt County. The comment also refers to Project Description Section 2.5, Proposed Plan Estimated Maximum Feasible Development Potential, and states that the GPU “would “allow for a significantly larger number of new dwelling units than the RDEIR anticipates and accounts for.”

**Response to Comment C4-6:** Table 2.5-1, General Plan Update Acreage of Land Use Designations, Estimated Maximum Feasible Housing Development Potential and Projected Development 2016 – 2040, shows the acreage of each land use designation within the unincorporated area and excludes areas subject to physical constraints (100-year flood zones, Alquist-Priolo earthquake fault zones, wetlands, streamside management areas, areas with slopes greater than 30 percent, and areas with known history of landslide activity) to identify total vacant developable acres. The discussion in Section 2.5 states that these areas could theoretically provide for as many as 38,972 additional dwelling units in the unincorporated area of the County if developed at the full density allowed for each land use designation as proposed in the GPU.

The discussion in Section 3.0-1, Growth Assumptions under the General Plan associated with the Planning Area & Period, states that, “(t)he estimated maximum feasible housing development potential of the General Plan Update land uses is far greater (38.972 housing units) than can reasonably be expected to be developed within the planning period of the General Plan (2016-2040).” “(T)he most recent population projections for Humboldt County from (California Dept. of Finance) reveal that Humboldt County’s population is projected to grow fairly slowly in the coming years, and reach a peak population in 2028 of 141,441 persons, and then it is projected to start to decline to 138,307 persons in 2040, at the end of the planning period. The project Description states that “if the unincorporated share of total county housing remains constant at approximately 53 percent with the same vacancy rate, a projected 1,721 new dwelling units will be needed to be to support the peak population level in the unincorporated area of the County,” according to the California Dept. of Finance, 2014.

The Project Description further states that “This Revised Draft Environment Impact Report evaluates the impacts associated with the growth expected during the planning horizon lasting until 2040. The peak impacts will be realized in the year 2028 when

population reaches 141,441. The years between 2028-2040 will see a decline in the population. The EIR uses the population in 2028 as the point at which the maximum level of impacts will be realized. This RDEIR does not analyze buildout of all allocated land use within the county because based upon foreseeable population trends buildout of all land uses is highly speculative and is not projected to occur within the next 100 years." The RDEIR analyzes the environmental effects of reasonably foreseeable development and does not analyze speculative impacts that could occur as a result of theoretical buildout if all land were developed at the full density allowed for each land use designation as proposed in the GPU. Analysis of the theoretical buildout in the EIR could lead to new mitigation measures such as impact fees and additional regulatory requirements on new development needed to address the buildout that would occur beyond the timeframe of the GPU.

Regarding the comment that the RDEIR fails to address how these regulatory constraints may or may not impact the environment, the economy, or the people of Humboldt County, the EIR analyzes the regulatory constraints of the GPU on the environment. Analysis of social and economic impacts is not required by CEQA. This comment does not address specific impacts or mitigation measures in the RDEIR. Therefore, no further response is required under CEQA.

**Comment C4-7:** This comment states that Scenic Resources policies, especially relating to scenic vistas, create regulatory constraints and that there is no analysis of this concept, which could result in potential social and economic impacts. This comment excerpts a discussion of GPU policies from the Analysis of Relevant General Plan Update Policies from Impact 3.16.3.1: Adverse effect on Scenic Vistas and Scenic Resources.

**Response to Comment C4-7:** The analysis of adverse effect on Scenic Vistas and Scenic Resources concludes that the impact of the GPU, even after the implementation of a mitigation measure, is significant and unavoidable. This comment suggests the EIR should consider economic and social impacts of the GPU, which is not a requirement of CEQA. The comment does not address specific impacts or mitigation measures in the RDEIR. Therefore, no further response is required under CEQA.

**Comment C4-8:** The comment objects to the lack of justification for scenic resource protection measures in the GPU.

**Response to Comment C4-8:** This comment suggests the EIR should consider economic and social impacts of the GPU, which is not a requirement of CEQA. The comment does not address specific impacts or mitigation measures in the RDEIR. Therefore, no further response is required under CEQA.

**Comment C4-9:** This comment suggests that the analysis of water and wastewater capacity omits commercial and industrial uses and continues a trend of minimizing concern for industrial and commercial uses.

**Response to Comment C4-9:** The analysis of available service connections for water and wastewater systems in Chapter 3.3 Utilities and Services Systems is based on the Community Infrastructure & Services Technical Report, July 2008, and information and capacity updates provided by services providers and Local Agency Formation

Commission Municipal Service Reviews. The presentation of water and wastewater capacity if based on the Community Infrastructure & Services Technical Report format, which generally used average usage rates per connection and peak usage rates per connection source capacity, storage capacity, and distribution system standards are set forth in the Waterworks Standards regulations, outlined in the California Code of Regulations and the permit requirements from the Regional Water Quality Control Board – or an average usage per connection regardless of land use type. Available capacity could be used by new residential, commercial, or industrial development. This comment does not address specific impacts or mitigation measures in the RDEIR. Therefore, no further response is required under CEQA.

**Comment C4-10:** This comment states that the GPU would allow for a significantly larger number of new dwelling units than the RDEIR analyzes. This comment also states that the 1,721 housing units that are needed to accommodate projected population growth with the unincorporated have already been constructed without the County's knowledge, or without permits.

**Response to Comment C4-10:** See response to comment C4-6 above for a discussion of the environmental effects of reasonably foreseeable development versus speculative impacts that could occur as a result of theoretical buildout if all land were developed at the full density allowed for each land use designation as proposed in the GPU. See response to comment C2-4 above for a discussion of illegal building and illegal subdivisions. This comment does not address specific impacts or mitigation measures in the RDEIR. Therefore, no further response is required under CEQA.

**Comment C4-11:** This comment notes that Table 3.7-5, Land Planned for Industrial Uses, on Page 3.7-21 shows land planned for industrial uses within inland Community Planning Areas and not with Coastal Zone Areas. The comment further states that Section 3.4, Public Services, "claims that there is sufficient land zoned for commercial and industrial uses in the County, but also states that the majority of that land is located in and around Humboldt Bay and/or the coastal zone." The comment suggests that the RDEIR is inconsistent because "does not otherwise address any of the areas located in the coastal zone, instead deferring discussion of those areas to the Local Coastal Plan, yet opts to include them in its inventory of industrial and commercial land."

**Response to Comment C4-11:** The discussion above Table 3.7-5 states that "Including the coastal zone area, which is not the subject of this EIR, there are over 3,370 acres of land planning for industrial purposes. Approximately 48 percent of that land is within the coastal zone, almost all of which is within the Humboldt Bay Area coastal planning area."

References to "commercial and industrial" in Section 3.4, Public Services, are contained in Impact 3.4.3.2. Fire Protection, and are used to describe the distribution of new development across the unincorporated area to accommodate project peak population and commercial/industrial employment growth. This analysis does not suggest that "that there is sufficient land zoned for commercial and industrial uses" as suggested in the comment, rather this analysis reports that "3.1 million square feet of commercial and industrial building (will be needed) to accommodate projected new

employment by 2040. Although new construction would be distributed across the unincorporated area, 89 percent of housing units and 92 percent of commercial and industrial square footage are projected to be developed within the more urbanized community plan and coastal zone areas. Almost 60 percent of new housing units are projected to be located within the communities around the Humboldt Bay, including the residential areas of Cutten, Ridgewood, and McKinleyville. Approximately 50 percent of commercial and industrial square footage is projected to be located within the communities around the Humboldt Bay, two-thirds of which would occur in the industrial areas along the Samoa Peninsula and Fields Landing.” (Page 3.4-17)

Although the comment does not identify a new impact or the need for a new mitigation measure, it would be appropriate to modify Table 3.7-5, Land Planned for Industrial Uses in the EIR, to include industrial land within the Coastal Zone, given that the narrative discloses the proportion of industrial land within the Coastal Zone. The following edits are made to Table 3.7-5, Land Planned for Industrial Uses, Impact 3.7.4.1: Hazardous Materials, on Pages 3.7-21 and 3.7-22 to include industrial land in the Coastal Zone (underlined):

Community Planning Area	Acres by Land Use Designation					Total
	IG	IR	MB	MC	MG	
Arcata	66.3	13.4				79.7
Avenues-Myers Flat	12.9					12.9
Avenues-Stafford-Redcrest	45.3					45.3
Blue Lake	231.1	218.3				449.4
Carlotta/Hydesville	30.7	35.0				65.7
<u>Eel River (CZ)</u>	<u>90.6</u>	-	-	-	-	<u>90.6</u>
Fieldbrook-Glendale	75.2	4.2				79.4
Fortuna	148.6					148.6
Garberville/Redway/Benbow	112.2	51.2				163.4
<u>Humboldt Bay (CZ)</u>	<u>475.8</u>	-	<u>11.9</u>	<u>970.6</u>	<u>14.4</u>	<u>1,472.7</u>
McKinleyville	119.7	2.1				121.8
<u>McKinleyville (CZ)</u>	-	-	<u>34.1</u>	-	-	<u>34.1</u>
<u>North Coast (CZ)</u>	<u>60.7</u>	-	-	-	-	<u>60.7</u>
Orick		20.2				20.2
Orleans	37.1					37.1
Rio Dell/Scotia	282.3					282.3
Willow Creek	65.5	19.9				85.4
Outside CPAs	129.3	17.4		0.1	0.6	147.3
<b><u>Total</u></b>	<b><u>1,983.3</u></b>	<b><u>381.7</u></b>	<b><u>46.0</u></b>	<b><u>970.8</u></b>	<b><u>15.0</u></b>	<b><u>3,396.7</u></b>

**Comment C4-12:** This comment suggests that the RDEIR is inconsistent because Mitigation 3.10.3.4.a in Impact 3.10.3.4: Housing within a 100-year Flood Hazard Area or Expose People or Structures to Flooding from Levee or Dam Failure, Tsunami, or Mudflow addresses the Local Coastal Program.

**Response to Comment C4-12:** The analysis in Impact 3.10.3.4 states that “(t)sunami inundation areas lie almost exclusively within the Coastal Zone, where they are addressed as part of the Hazards section of the certified Local Coastal Program and the Coastal Act.” A review of the Humboldt County Web GIS shows that tsunami evacuation areas extend outside the Coastal Zone in a number of areas and as mapping of the 100-year tsunami run-up elevation in concert with sea level rise mapping are revised, Mitigation 3.10.3.4.a may affect more non-Coastal Zone areas. This comment does not identify additional impacts or the need for additional mitigation measures in the RDEIR. Therefore, no further response is required under CEQA.

**Comment C4-13:** This comment suggests that the focus of the RDEIR on the “estimated need for development as compared to the maximum possible level of build-out density” in Chapter 5. Other CEQA Considerations, 5.2 Cumulative Impacts, “vastly underestimates the potentially massive impacts on public services that the General Plan may stand to produce.”

**Response to Comment C4-13:** Response to comment C4-6 describes how the RDEIR analyzes the environmental effects of reasonably foreseeable development and does not analyze speculative impacts that could occur as a result of theoretical buildout if all land were developed at the full density allowed for each land use designation as proposed in the GPU. The CEQA Guidelines Section 15130(b) states that “(t)he discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence.” Section 5.2 Cumulative Impacts relies on projected population growth countywide by the State of California, Department of Finance, and the cumulative environmental effects which may reasonably be expected to occur during the 24-year planning period of the GPU, 2016-2040. As stated in the response to comment C4-6 above, this RDEIR does not analyze buildout of all allocated land use within the county because based upon foreseeable population trends buildout of all land uses is highly speculative and is not projected to occur within the timeframe of the GPU.

**Comment C4-14:** This comment states that there are inconsistencies between the narrative discussion of water and wastewater providers in Chapter 3.3 Utilities and Services Systems and the tables that summarize available water and wastewater connections. The example provided by the commenter states that “RDEIR Table 3.3-1 shows that the Loleta Community Services District has 258 water connections, and that there an additional 56 water connections available.

The comment further states that “Table 3.3-2 shows that the Garberville CSD has 353 existing wastewater connections and that there are an additional 180 connections available. However, the RDEIR does not explicitly state that there are additional connections available for Garberville. The inconsistency between the numbers presented in Table 3.3-1 and Table 3.3-2 and as presented in corresponding narrative text... is confusing.”

The comment further lists twelve water and wastewater service providers and states that the RDEIR text and tables contain issues with consistency.

**Response to Comment C4-14:** narrative text in the RDEIR found on page 3.3-15, "Loleta Community Services District," cites a 2008 LAFCo report which states that "The [Loleta Community Services] District believes that they can supply an additional 60-70 (40 to 50 based on Building Permit data as of 2016) homes."

The RDEIR is "a substantial revision of the Draft EIR for the County of Humboldt GPU that was originally circulated for public comment between April 2, 2012 and June 15, 2012" (Section 1.1, Purpose of the EIR). Table 3.3-8, Projected Housing Units (2028) by Water Service Provider, is a substantial revision of the Draft EIR Table 3.3-9, Allowable Development by Water Service Provider. For the Loleta CSD, there were an estimated 239 existing water service connections in 2012 and an estimated 75 available water service connections. Between 2012 and 2016, there were 19 approved building permits with the boundaries of the Loleta CSD. As a result, the estimated existing water service connections was increased from 239 to 258 and available connects was reduced from 75 to 56.

The narrative for the Loleta CSD was updated based on the best available information to add a statement from the LAFCo Municipal Service Review regarding the District's ability to supply water to additional developments. The methodology described in this paragraph was used to update the narrative descriptions of water and wastewater service providers as well as the estimated existing water and wastewater service connections and estimated available water and wastewater service connections for each service provider.

In response to the Garberville SD comment, the RDEIR states on Page 3.3-39: "Garberville SD. Approximately three housing units are projected to be developed within Garberville by 2028, which is fraction of the 180 additional connections that are estimated to be available." There does not appear to be any inconsistency between the text and the tables in this instance.

In response to the comment that text and tables contain issues with consistency in discussion of twelve other CSD's, the comment does not identify any inconsistencies. This comment does not identify additional impacts or the need for additional mitigation measures in the RDEIR. Therefore, no further response is required under CEQA.



**Comment C4-15:** This comment states that Tables 3.2-4 through 3.2-15, which display Resource Land by Planning Watershed, do not equal the totals a land planned T, AE, and AG in Table 3.2-3, Countywide Resource Land.

**Response to Comment C4-15:** The following edit is made to Table 3.2-3 of Impact 3.2.3.1: Convert Farmland or Forest Land:

**Table 3.2-3. Countywide Resource Land.**

Land Use Designation	Framework General Plan		Proposed General Plan Update	
	Acres	Max Buildout (Units)	Acres	Max Buildout (Units)
T	899,717	19,876	897,026	19,398
	899,700	19,892	893,840	
AE	59,465	1,925	76,311	2,181
	59,464		113,608	2,179
AG	409,722	18,041	377,838	17,201
	409,720		381,846	
<b>Total</b>	<del>1,368,904</del> <b>1,368,884</b>	<del>39,842</del> <b>39,858</b>	<del>1,351,175</del> <b>1,389,294</b>	<del>38,780</del> <b>38,778</b>

This comment does not identify additional impacts or the need for additional mitigation measures in the RDEIR.

**Comment C4-16:** This comment states that Table 3.7-5, Land Planned for Industrial Uses, lists land planned for industrial uses by community planning areas, but only reflects the inland areas of the county. The comment also states that total industrial acreages in Table 3.7-5 are not consistent with Table 2.5-1, General Plan Update Acreage of Land Use Designations, Estimated Maximum Feasible Housing Development Potential and Projected Development 2016 – 2040.

**Response to Comment C4-16:** See response to comment C4-11 for the response to concerns regarding Table 3.7-5, Land Planned for Industrial Uses.

For the comment regarding a potential inconsistency between Table 3.7-5, Land Planned for Industrial Use, and Table 2.5-1, General Plan Update Acreage of Land Use Designations, Estimated Maximum Feasible Housing Development Potential and Projected Development 2016 – 2040, Table 3.7-5 is intended to only show land planned for industrial purposes within Community Planning Areas whereas Table 2.5-1 shows all industrial land. It should be noted that as a result of comment C4-11, Table 3.7-5 is revised to include industrial land in the coastal zone. This comment does not identify additional impacts or the need for additional mitigation measures in the RDEIR. Therefore, no further response is required under CEQA.

**Comment C4-17:** This comment identifies two incorrect references to Table 3.7-4 on pages 3.7-21 and 3.7-22. The incorrect references contain the correct table name, Land Planned for Industrial Uses, but the wrong table number.

**Response to Comment C4-17:** The following edits are to be made to the first sentence of the last paragraph on page 3.7-21 and to the first sentence of the last paragraph on 3.7-22 in the discussion of Impact 3.7.4.1: Hazardous Materials:

“Table 3.7-~~54~~ below displays how much land is planned for industrial uses in Humboldt County. Including the coastal zone area, which is not the subject of this EIR, there are over 3,370 acres of land planning for industrial purposes.”

“Table 3.7-~~54~~, Land Planned for Industrial Uses, identifies the acres within each community planning area that are planned for industrial uses.”

**Comment C4-18:** This comment states that “that some of the “mitigation measures” listed throughout this Program EIR do not meet the criteria for mitigation as laid out in CEQA.” The comment further states that “(t)here is absolutely no objection to presenting the “mitigation” items in question which are currently identified as mitigation measures, but would more appropriately be identified as new or modified goals, policies, standards or implementation measures, to the Board of Supervisors for consideration and re-circulation; however, they should not be identified as mitigation” and that “In other instances, impacts are lacking mitigation measures where they require one. This often results from either relying on the efforts of other agencies or underestimating the level of significance to which an impact rises.”

**Response to Comment C4-18:** The proposed project is the adoption and implementation of the GPU, a comprehensive amendment to the County General Plan. The Governor’s Office of Planning and Research General Plan Guideline, Chapter 3, Preparing and Amending the General Plan, state that “CEQA requires that general plan policies and the implementation program reflect the mitigation measures identified in the plan’s EIR. In addition, the jurisdiction must adopt a mitigation monitoring or reporting program to ensure that mitigation measures are implemented (Public Resources Code §21081.6(b)).” In response to this requirement, mitigation measures contained with the RDEIR are structured as new or modified General Plan policies, standards, or implementation measures so that they can be integrated into the General Plan and therefore properly reflecting the GPU EIR.

CEQA Guidelines Section 15097 states that “(w)here the project at issue is the adoption of a general plan, specific plan, community plan or other plan-level document (zoning, ordinance, regulation, policy), the monitoring plan shall apply to policies and any other portion of the plan that is a mitigation measure or adopted alternative. The monitoring plan may consist of policies included in plan-level documents. The annual report on general plan status required pursuant to the Government Code is one example of a reporting program for adoption of a city or county general plan.” The GPU implementation action plan that is to be prepared as part of the GPU adoption package, with the final EIR, will contain the GPU goals, policies, standards, and implementation measures and will identify the timeline for implementation, responsible party, and the cost of implementation (if the responsible party is a County department).

The mitigation monitoring and reporting program for the RDERI will be identical to the portions of the implementation action plan that address policies, standards and implementation programs that are integrated into the General Plan by action of the Board of Supervisors.

Regarding the comment that the listed Impacts lack mitigation measures, where RDEIR impact analyses lack mitigation measures, either: (1) the impact was determined to be less than significant, or (2) the impact was determined to be significant and that no feasible mitigation measures were identified, beyond the policy, standards, and implementation measures of the GPU. The following table lists each of the Impact items Identified as lacking mitigation measures and the corresponding conclusion contained in the RDEIR and proposed mitigations measures, if any.

Impact Items Identified as Lacking Mitigation Measures

Impact	Conclusion
Impact 3.5.3.1 – Increase in Vehicle Miles Traveled	Mitigation 3.5.3.1.a included Impact remains significant unavoidable after mitigation
Impact 3.3.3.3. New Storm Water Drainage Facilities	Less Than significant
Impact 3.4.3.1. Schools	Less Than significant
Impact 3.4.3.2. Fire Protection	Less Than significant
Impact 3.4.3.3. Law Enforcement	Less Than significant
Impact 3.11.3.1 Sensitive Species and Sensitive Habitat Areas	Less Than significant
Impact 3.11.3.3. Wildlife Corridors and Nursery Sites	Less Than significant
Impact 3.12.4.3 Objectionable Odors	Less Than significant
Impact 3.13.4.1. Greenhouse Gas Emissions	Significant and Unavoidable None identified beyond the Climate Action Plan
Impact 3.14.3.2. Archaeological and Paleontological Resources	Less Than significant
Impact 3.15.3.2. Construction of New Recreational Facilities	Less Than significant
Impact 3.17.4.1: Land uses or development patterns cause wasteful, inefficient, or unnecessary consumption of energy	Significant and Unavoidable None identified beyond Comprehensive Action Plan for Energy and Climate Action Plan
Impact 3.17.4.2: Land Uses require or result in the construction of new or expanded energy production or transmission facilities, the construction of which could cause significant environmental effects	Less Than significant

**Comment C4-19:** This comment states that a number of policies lack implementation measures and that the commenter is concerned that policies “which may have future impacts but lack implementation measures are difficult to evaluate from an EIR standpoint as there is no indication of what the impacts of carrying out that stated policy goal may be.” Also included with the comment is a list of policies that the commenter has determined lack implementation measures.

**Response to Comment C4-19:** The RDEIR assesses and documents the broad environmental impacts that can be expected to occur from the adoption and implementation of the General Plan Update during the planning period to 2040, as more fully explained in Chapter 2 – Project Description. Each section of Chapter 3, Environmental Setting and Impacts, further describes the potential impacts of the GPU and how GPU policies, standards, and implementation measures may lessen potential impacts. Where the lack of a policy, standard, or implementation measure would result in a significant environmental effect, a mitigation measure is proposed that that specifies an appropriate policy, standard, or implementation measure. Lack of an implementation measure in and of itself is not a significant environmental effect.

The documents that will accompany the adoption of the GPU will include an Implementation Action Plan, which is identified as Appendix A to the GPU. The Implementation Action Plan will identify how each policies and standard will be implemented and identify the priority, timing, resources needed, and cost of each implementation. This comment does not address specific impacts or mitigation measures in the RDEIR. Therefore, no further response is required under CEQA.

**Comment C4-20:** This comment identifies that the Draft GPU lacks an Implementation Action Plan.

**Response to Comment C4-20:** See response to comment C4-19 above which describes the content and timing of the GPU and the Implementation Action Plan. This comment does not address specific impacts or mitigation measures in the RDEIR and as a result, no further response is required under CEQA,

**Comment C4-21:** This comment states that certain GPU policies, goals, implementation measures, etc., are to be given “priority” consideration, or are a “priority” of the plan. References to priorities in the RDEIR relate to the wording of specific goals, policies, or implementation measures in the GPU.

**Response to Comment C4-21:** This comment does not address specific impacts or mitigation measures in the RDEIR. Therefore, no further response is required under CEQA.

**Comment C4-22:** This comment states that a number of references are made to the Ridgewood Village Draft EIR, which cannot be relied upon because it was not certified.

**Response to Comment C4-22:** The RDEIR does not rely on the Ridgewood Village Draft EIR for mitigation, only to assist in characterizing the types of impacts that may result from the construction of a fire station. The Ridgewood Village Draft EIR identified

potentially significant environmental effects in a number of areas which are listed on Page 3.4-18 of the RDEIR. The RDEIR describes how the GPU policies, standards, and implementation measures could lessen the potential impacts of a fire station, if one were to be constructed.

**Comment C4-23:** This comment states that Chapter 4, Evaluation of Alternatives, does not address GPU Plan Alternative C, "which seems to be a deficiency."

**Response to Comment C4-23:** Page 4-4 of the RDEIR explains why Alternative C was not analyzed as a CEQA alternative:

"(Alternative C) is rejected from further consideration in this EIR because it increases environmental impacts compared to the Project, and because CEQA only requires evaluation of alternatives in the EIR that would reduce or eliminate environmental impacts of the Project."

This comment does not address specific impacts or mitigation measures in the RDEIR. Therefore, no further response is required under CEQA.

Letter C5 Kent Sawatzky

7-25-17

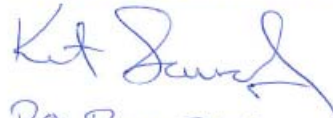
OBJECTION OR CONCERNS REGARDING  
THE GENERAL PLAN UPDATE EIR.

THE EIR FAILS TO ADDRESS THE FACT  
THAT MARIJUANA IS A SCHEDULE I SUBSTANCE  
ACCORDING TO THE FEDERAL GOV.

THE GENERAL PLAN ALLOWS, FACILITATES, AND  
ENABLES TAXATION OF A FEDERAL CRIMINAL  
ACT WITHOUT ADDRESSING THE CONSEQUENCES  
OF DOING SO, INCLUDING BUT NOT  
LIMITED TO ENVIRONMENTAL, SOCIOLOGICAL,  
HEALTH, AND COSTS RELATED TO THE ABOVE.

C5-1

Kent Sawatzky



P.O. Box 765

BLUE LAKE CA 95525

707-CCB-5288

707-496-7454



**Responses to Kent Sawatzky - Letter C5**

**Comment C5-1:** The commenter states the RDEIR fails to address the environmental, sociological, health and costs related to the GPU, which “allows, facilitates, and enables taxation of a federal criminal act.”

**Response to Comment C5-1:** See response to comment C4-1 above.

Letter C6 Food Fiber and Flowers



Humboldt County Planning and Building Department  
 3015 H Street  
 Eureka, CA. 85501  
 Attn: Michael Richardson

P.O. Box 624, Fortuna, CA. 95540

**Directors:**

Dave Feral  
 Feral Family Farm

Paul Giuntoli  
 Warren Creek Farm

Portia Bramble

John Gary  
 Organic Matters Ranch

Clif Clendenen  
 Clendenen's Cider Works

Kevin & Melanie Cunningham  
 Shakefork Community Farm

Erin Derden-Little

Jacque and Amy Newkom  
 Newkom Family Farm

Mel Kreb  
 Flood Plain Produce

Martha Spencer MS  
 Natural Resource Planner

Jared Zystro Phd  
 Plant Breeder and Geneticist

John LaBoyteaux  
 Camp Grant Family Farm

RE: GPU—RDEIR

Dear Michael:

This group of local industry experts and representatives believes that Humboldt County planning policies, both past and present, have never recognized the unique and diverse agricultural productivity of inland regions of the County as compared to the well known dairy lands around Humboldt Bay.

A mountainous and forested county, Humboldt has multiple agricultural districts, with excellent agricultural soils where much of the regions' food production is currently taking place. These areas are different from the well known dairy lands around Humboldt Bay. These inland areas have a longer growing season, support a wide diversity of crops, and have developed their own transportation systems and market opportunities.

Walk down the line at multiple farmers markets throughout the County and note where the farms are located. Orleans, Willow Creek, Blue Lake, Jacoby Creek, Carlotta, the Van Duzen, Mid-Eel, and Mattole Valleys, Ettersburg, Phillipsville, Garberville and more. The fertile lands in these areas are sought by the farmers raising the wide variety of crops that support a vibrant local food system. Some farmers in these areas also export crops to out of County markets.

Focused mostly on timber, dairy and cattle, neither the 1984 Framework Plan nor the GPU recognizes these areas for their unique and important agricultural contribution to the County. While the 60 acre minimum parcel for AE lands is universally supported by Humboldt agriculture, most all of the agricultural conversions, through land use designation changes in the GPU, are located in these more inland agricultural districts.

The new "Residential Agriculture" designation, like its predecessors "Agricultural Rural" and "Agriculture Suburban" is a residential designation. These designations are intended to provide first for residential development and do not recognize the unique value and productivity of prime agricultural soils. Retaining those soils in units large enough to sustainably support a wide range of agricultural crops, is not the purpose of these designations.

C6-1



On existing smaller parcels of prime soil, allowing two residential units by right within a three acre curtilage may remove agriculture from the parcel entirely. Agricultural parcels cannot be equated with TPZ parcels which are generally larger overall.

Food, Fiber and Flowers requests, as an implementation measure in the GPU, that the County identify and inventory prime agricultural soil parcels within the agricultural districts listed above and any other unique locations throughout the County.

Thank you.

John LaBoyteaux

C6-2

## Responses to Letter C6 - Food Fiber and Flowers

**Comment C6-1:** The commenter describes the agriculture industry in the County and concludes that the GPU does not recognize the highly productive agricultural areas for their unique and important agricultural contributions to the County. He states the new GPU land use designations are contributing to the conversion of these areas away from productive agricultural use. Specifically, the Residential Agriculture designation does not “recognize the unique value and productivity of prime agricultural soils. Retaining these soils in units large enough to sustainably a wide range of agricultural crops, is not the purpose of these designations.”

**Response to Comment C6-1:** The comment expresses objection to the application of the RA designation to areas with prime agricultural soils. This comment does not address specific impacts or mitigation measures in the RDEIR. Therefore, no further response is required under CEQA.

**Comment C6-2:** The commenter expresses concern that the allowance of two residential units by right within a three-acre curtilage on small parcels with prime soils may preclude use of smaller parcels for agriculture. The commenter goes on to request an implementation measure be added to the GPU to inventory prime agricultural soil parcels “within the agricultural districts listed above and any other unique locations throughout the County.”

### Response to Comment C6-2:

The comment requests an implementation measure be added to the GPU. This comment does not address specific impacts or mitigation measures in the RDEIR and thus, no further response is required under CEQA. The establishment of an inventory of parcels that contain prime agricultural soils is a proposal related to the General Plan itself rather than the GPU EIR, and could be considered as an implementation measure to be added to the Plan.

Letter Green Diamond Resource Company



California Timberlands Division
P.O. Box 1089
Arcata, California
95521-1089

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F (707) 668-3710
gdrco@diamond.com

June 29, 2017

Via Hand Delivery and Email

Michael Richardson, Senior Planner
County of Humboldt
Planning and Building Department
3015 H Street, Eureka, CA 95501
Email: mrichardson@co.humboldt.ca.us



Re: Green Diamond Resource Company comments; Revised Draft EIR and the Appendices for the Humboldt County General Plan Update.

Dear Mr. Richardson,

With this letter Green Diamond Resource Company, a Washington corporation ("GDRCo"), respectfully submits comments regarding the Humboldt County General Plan Update Revised Draft EIR (RDEIR) and the Appendices. GDRCo's comments are specific to the project analyzed in the RDEIR, described on page 2-1 of the RDEIR in Chapter 2. Project Description, as follows:

"The project analyzed in this recirculated and revised draft Environmental Impact Report (RDEIR) is the proposed Humboldt County General Plan (referred to as the proposed General Plan Update (GPU)). The text reflects the Board of Supervisors Markup Draft from October 19, 2015. The proposed General Plan includes goals, policies, standards, implementation measures, and land use maps as recommended by the Planning Commission. This draft, reviewed by the Planning Commission, was evaluated in the April 2, 2012 Draft Environmental Impact Report. During public hearings between June, 2012 and March, 2016, the Board of Supervisors has made modifications, additions, and deletions to that draft. The RDEIR is focused on environmental effects which may reasonably be expected to occur during the 24-year planning period of the GPU, 2016-2040, as detailed in subchapters 2.1 and 2.5 below."

Furthermore, as discussed in detail below, GDRCo's comments are submitted based upon the opinion and position that the RDEIR, the Natural Resources and Hazards Report (Sept. 2002 draft) (Appendix D to the RDEIR), and the Forest Resources Report (Oct. 2003 draft) (Appendix F to the RDEIR) all incorrectly characterize the process of recognizing and/or determining the scope and extent of "legal parcels" and/or adjusting parcel boundaries (without creating "new" parcels) under the California Subdivision Map Act (California Government Code §§ 66410, et seq.) as acts of "conversion" and/or "subdivision" of timberlands. Specifically, the RDEIR and cited Reports conclude, without support or justification, that the Determination of Status process, the Certificates of Compliance process, the recognition of Patent Parcels, and Lot Line Adjustments under the Subdivision Map Act constitute a conversion and/or subdivision of timberlands for purposes of assessing environmental impacts. As discussed in detail in Attachment A to these Comments and the legal opinion appended as Attachment B, these conclusions and the general commentary on the subject included in the RDEIR are not supported by substantial evidence, materially contradict the conclusions reached in studies commissioned and cited as support for the RDEIR, and misstate the findings reached by California resource agencies when reviewing the issue.

C7-1

Lastly, GDRCo has submitted requests for land use designation changes throughout the General Plan Update process. In reviewing the Map Book (Appendix F to the RDEIR - Planning Commission Draft) and the associated County GIS land use maps, many of these land use designation changes have been incorporated but some discrepancies remain, and those are identified in these Comments. Specifically, Attachment C to these Comments summarizes the discrepancies identified and provides what GDRCo believes to constitute the correct land use designation changes for each affected parcel based upon the Board of Supervisors' Draft General Plan Update and previous work during the Update process.

C7-2

Sincerely,

Green Diamond Resource Company

By:   
Neal D. Ewald  
Senior Vice President, California Operations

### Attachment A

GDRCo Comment	Page	Comment
#1	3.2-11	<p>Beginning with the second paragraph on page 3.2-11, the RDEIR makes an unsubstantiated statement regarding timberland “conversion”. Specifically, the RDEIR characterizes the Determination of Status and Certificate of Compliance process established for recognizing legal parcels of land under the California Subdivision Map Act (California Government Code §§ 66410, et seq.) (the “Subdivision Map Act”) to constitute acts of “converting” and/or “subdividing” timberlands. This is incorrect and a misstatement of fact. The incorrect characterization of what constitutes “timberland conversion” is repeated in multiple locations in the RDEIR and portions of the RDEIR materially misstate the reports cited in support of the discussion regarding Forest and Agricultural resources.</p> <p>Although GDRCo acknowledges that timberland conversion can certainly occur as part of new subdivisions and associated zoning reclassifications and General Plan amendments, timberland conversion does not occur through the Certificate of Compliance process. The Certificate of Compliance process is simply the procedure to determine the baseline parcel status of units of land, subject to conveyance in compliance with the Subdivision Map Act, nothing more. Recognition of a legal parcel under the Subdivision Map Act is not a “subdivision”, to the contrary it is recognition of a legal unit of land which pre-existed adoption of the Act (adopted and made effective on March 1, 1975) and, for purposes of RDEIR evaluation, constitute a baseline condition. Issuance of a Certificate of Compliance in no way affects the zoning assigned to the recognized parcel or the permitted principal and conditional uses attendant to that zone classification. Any substantive change in the principal and conditionally permitted uses of the parcel requires a discretionary zoning reclassification and accompanying General Plan amendment.</p> <p>Furthermore, and of substantial significance, the conversion of timberland to a use other than growing timber requires, prior to conversion, a Timberland Conversion Permit approved by the California Department of Forestry and Fire Protection (“CAL FIRE”) or, if eligible, a Less Than 3 Acre Conversion Exemption (likely affecting only a portion of a parcel) accepted by CAL FIRE.</p> <p>The general commentary included in the RDEIR equating issuance of Certificates of Compliance and recognition of legal parcels/units of land under the Map Act with “timberland conversion” should be revised and/or removed as it does not accurately depict what a Certificate of Compliance is and the process does not directly result in the conversion of agricultural land or timberland. As discussed in greater detail below, these presumptions included in the RDEIR are not supported by substantial evidence or the studies cited in support of the conclusions.</p>
#2	3.2-11	<p>Beginning with the third paragraph on page 3.2-11, the RDEIR contains an incorrect statement that a Certificate of Compliance results in a change in “land use”. Again,</p>

C7-3

C7-4

		<p>changes in land use may only be achieved through either a General Plan Amendment and accompanying zoning change or through the General Plan Update process. The language regarding Certificates of Compliance should be removed as it does not accurately depict the circumstances under which a change in land use may occur. As the County is well aware, the Certificate of Compliance process on agricultural lands and timberlands routinely yields the identification of parcels containing substantial acreage volume, oftentimes in increments equal to the entirety of the original United States Patent. There is no basis to conclude the parcel recognition, in and of itself, constitutes a “conversion” of pre-existing land uses and the County has not identified substantial evidence to reach this conclusion.</p>	C7-4
#3	3.2-11	<p>Beginning with the fourth paragraph on page 3.2-11, the RDEIR again makes a reference to conversion of agricultural lands and timberlands.</p> <p>The conversion of timberland to a use other than growing timber requires, prior to conversion, a Timberland Conversion Permit approved by CAL FIRE or, if eligible, a Less Than 3 Acre Conversion Exemption accepted by CAL FIRE.</p> <p>To the extent that the statement provided in the RDEIR relies upon the incorrect assumption that the Certificate of Compliance process results in conversion of agricultural lands and timberland it is not supported and should be revised or removed accordingly.</p>	C7-5
#4	3.2-12	<p>The information and discussion appearing in the first paragraph regarding County parks and community parks appears to exclude the 1,000 acre (+/-) McKay Community Forest acquired by the County of Humboldt in August, 2014. If the Community Forest acreage is omitted, the County park acreage recited in the RDEIR does not represent current conditions and should be revised accordingly.</p>	C7-6
#5	3.2-12	<p>Beginning with the third paragraph, the information provided regarding the County’s timber industry does not reflect current conditions. According to the California State Board of Equalization, between 2010 and 2015, the total value for Humboldt County’s timber harvest has fluctuated between approximately \$68 million and \$71 million, with a high of \$81 million in 2014. This information should be revised to represent current conditions. (Supporting information for these statistics is enclosed as Attachment D.)</p>	C7-7
#6	3.2-14	<p>Under the topic “Timberland Conversion” appearing on page 3.2.-14, the commentary regarding the existence of multiple viewpoints of “timberland conversion” depending on how the terms is defined and in what context the term is used is unsubstantiated and misleading. The operative definition provided in the RDEIR and recognized in the timber industry for “Timberland Conversion” is that appearing in the California Forest Practices Act and implementing Regulations (California Code of Regulations Title 14, Article 7). This is the only definition that should be used in the context of discussing Timberland Conversion in the RDEIR or anywhere else in conjunction with the Humboldt County General Plan Update.</p> <p>The conversion of timberland to a use other than growing timber requires, prior to conversion, a Timberland Conversion Permit approved by CAL FIRE or, if eligible, a Less Than 3 Acre Conversion Exemption accepted by CAL FIRE.</p>	C7-8



	<p><i>on agricultural and timberlands, affecting more than 16,000 acres.</i></p> <p><i>These changes are primarily reflective of the breakup of old family ranches. Timber production on these areas is likely still viable; therefore, these changes are not deeply significant with respect to the timber economy. 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.</i></p> <p><i>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.</i></p> <p><i>Subsequently, the Forest Resources Chapter of the Natural Resources and Hazards Report prepared by the Department of Community Development Services incorrectly references Certificates of Compliance and Lot Line Adjustments as a means of "converting" timberland to other uses. The Department of Community Development Services reached this conclusion in direct contradiction to the finding by Dyett &amp; Bhatia that "Timber production on these areas [i.e., parcels recognized under the Certificate of Compliance process] is likely still viable; therefore, these changes are not deeply significant with respect to the timber economy". (The operative sentence from the actual Dyett &amp; Bhatia Report is highlighted in yellow above).</i></p> <p><i>Of note, the Forest Resources and Policies (October 2003 Draft, revised, April 2006), subsequently prepared by the Humboldt County Department of Community Development Services, relied upon the Natural Resources and Hazards report prepared by Dyett &amp; Bhatia. The Forest Resources and Policies report provided the following discussion regarding timberland conversion beginning on page 1-16 under Section 1.4; Conversion of Timberlands:</i></p> <p><b>1.4 CONVERSION OF TIMBERLAND</b></p> <p><i>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. 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.</i></p> <p><i>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</i></p>
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C7-10



		<p><i>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.</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p>As the highlighted text makes clear, the Forest Resources and Policies Report incorrectly references Certificates of Compliance and Lot Line Adjustments as a means of converting timberland and materially misstates the findings of the Natural Resources and Hazards Report prepared by Dyett &amp; Bhatia, 2002. The County's conclusion that changes in ownership by issuance of Certificates of Compliance "primarily reflective of the breakup of old family ranches" creates "unclear" effects on the timber economy contradicts the retained consultant's conclusion that any changes are not deeply significant.</p> <p>Finally the first sentence of the second chapter of the RDEIR at page 3.2-15 uses the same sentence in discussing timberland conversion in the context of changes in land management priorities. As stated in GDRCo comment #7, above, the use of the term conversion is misused in the context of discussing land management priorities and assumptions regarding parcel size, market conditions or ownership values are not supported and thus have not basis for inclusion in the RDEIR.</p> <p>Although GDRCo recognizes that there is no opportunity to revise any of the Background Reports used as part of the RDEIR, it does illustrate the importance of using the correct terminology in the correct context in a consistent manner throughout the process. Also, any discussion in the RDEIR should recite the actual conclusions of the retained consultants included in the supporting materials.</p>
<p>#9</p>	<p>3.2-15</p>	<p>The last paragraph on page 3.2-15 entitled "<b>Conversion from Fragmentation</b>" is entirely misleading, incorrect, and not substantiated by the material cited or the text in this section of the RDEIR. Moreover, the discussion materially omits the relevant discussion points and parcel size distinctions included in the cited CAL FIRE Fire and Resource Assessment Program's (FRAP) Forest and Range 2003 Assessment rendering the entire discussion in the RDEIR misleading and without proper context.</p> <p>Specifically, although the CAL FIRE Fire and Resource Assessment Program's (FRAP) Forest and Range 2003 Assessment, cited in the RDEIR, does include consideration of "fragmentation" and "parcelization" and the potential impacts that may consequently occur on agricultural and forest resources, the 2003 FRAP Assessment does not make a direct correlation between "parcelization" and "conversion" as does the title of this section. Of substantial import, although the RDEIR provides a definition of "parcelization", per the 2003 FRAP Forest and Range 2003 Resource Report at the foot of page 3.2-15 along with the FRAP definition of "rural residential" as being a housing</p>

C7-10

C7-11

		<p>Assessment appears to provide an appropriate definition.</p> <p>Again, it must be noted that, based on historic experience factors, the Certificate of Compliance process in Humboldt County routinely yields the identification of parcels substantially greater in size than 20 acres.</p>	C7-11
#10	3.2-16	<p>In the second paragraph of page 3.2-16 as part of its “parcelization” discussion the RDEIR references a study prepared by the North Coast Regional Land Trust (NRLT). However, the NRLT study does not utilize the term “parcelization” anywhere in the report. The NRLT report does use the term “subdivision” which is much more narrowly defined. However, the NRLT report fails to provide any data to substantiate that approximately 35,000 acres of forestland was subdivided in Humboldt County, as defined by the Subdivision Map Act. If, in fact, the approximate 35,000 acres simply changed hands as a result of a change in ownership, the report is overreaching and materially misleading in referring to the 35,000 acres as being subdivided.</p> <p>Furthermore, both the RDEIR and the NRLT report failed to consider the economic effects of variations in log prices and market demand which play a critical role in a landowner’s decision to harvest timber.</p> <p>Any discussion regarding the NRLT report in the RDEIR should be limited to terminology and/or the data utilized in the NRLT report. If in fact the approximate 35,000 acres referenced in the NRLT as being subdivided actually represents a change in ownership, the RDEIR should not rely on the NRLT report and any assumptions in the report regarding decreased timber harvest on these lands should be reconciled with market influences during the limited time period considered in the report.</p>	C7-12
#11	3.2-16	<p>The first sentence, third paragraph of page 3.2-16 misrepresents what a patent parcel is and incorrectly states that the existence of patent parcels affects “fragmentation” of land. The balance of the paragraph more accurately explains what a patent parcel is and the process by which it can be determined whether a patent parcel, or any parcel, is considered a separate legal parcel.</p> <p>Legal parcels, whether they are unaltered patent parcels or parcels created in conformance with the Subdivision Map Act, are the means by which property is held (owned). GDRCo does support retaining the rights of property ownership to the extent they exist. Any “fragmentation” of the forest resource land base in Humboldt County occurs as a result of external factors (economic, social, or other), not based upon the existence of patent parcels the vast majority of which substantially exceed 20 acres in size—which generally results in no fragmentation as concluded in the CAL FIRE 2003 FRAP Forest and Range 2003 Resource Report.</p> <p>The first sentence of the paragraph should be removed from the RDEIR as it misrepresents what a patent parcel is and incorrectly states that the existence of patent parcels creates fragmentation of land.</p>	C7-13
#12	3.2-17	<p>In the second paragraph, first two sentences on page 3.2-17 the RDEIR fails to explain that the change in ownership pattern for industrial timberland owners during the period from</p>	C7-14

		<p>2001 to 2008 was largely a result of companies closing sawmills due to a lack of timber supply from the US Forest Service. Many of these companies were heavily reliant upon timber from the US Forest Service and when sawmills closed all assets were typically liquidated, including timberland holdings.</p> <p>This information should be revised to further explain or substantiate the change in timberland ownership during this time period.</p>	C7-14
#13	3.2-17	<p>In the second paragraph, last sentence on page 3.2-17, a misleading statement appears regarding the recognition of patent or legal parcels. The recognition of patent or legal parcels (i.e. Certificates of Compliance) does not in and of itself serve as a legal mechanism to break up large ranches and timberland and has no impact on the permitted and/or conditionally permitted uses of land based on zoning classifications.</p> <p>A Certificate of Compliance relates only to issues of compliance or noncompliance with the Subdivision Map Act and local ordinances enacted pursuant thereto. A Certificate of Compliance does not certify that the real property for which the certificate has been issued is suitable for development in accordance with existing or future regulations nor does issuance of a Certificate of Compliance in any way permit uses of land not allowed by its zoning classification. Certificates of Compliance can be used to assist in valuing conservation easements, for financing purposes, or for matters pertaining to title and any restraint on their issuance violates the Subdivision Map Act and creates an unlawful restriction on the alienation of land.</p> <p>This information should be revised to state that landowners may elect to sell individual patents or legal parcels upon receipt of a Certificate of Compliance.</p>	C7-15
#14	3.2-17	<p>Beginning with the fourth paragraph and continuing through the third paragraph on page 3.2-18, the discussion of a previous proposal by MAXXAM Corporation is outdated and irrelevant as it was never a project, never came to fruition and any land use planning based on this artifact is unsupported and entirely speculative. The discussion regarding other land sales and any reference to illegal activities by the sellers or purchasers of property is irrelevant as these are issues related to enforcement and not the current Framework Plan or the proposed General Plan Update.</p>	C7-16
#15	3.2-18	<p>The fourth paragraph on page 3.2-18 contains a false narrative perpetuated throughout Section 3.2 that an individual timberland patent or legal parcel, when sold, is converted and no longer suitable for timber production. While it is acknowledged that there is an economy of scale related to the size of timberland holdings, and the corresponding management of same, the conveyance of an individual patent or legal parcel does not constitute conversion (as defined by CAL FIRE) nor does it constitute detrimental fragmentation, per se, as evaluated by the 2003 FRAP Forest and Range 2003 Resource Report referenced above. Therefore, the timber producing capabilities of timberlands are not necessarily lost as a result of the sale of an individual patent or legal parcel and the RDEIR discussion on this point is entirely speculative and unsupported.</p> <p>The conversion of timberland to a use other than growing timber requires, prior to conversion, a Timberland Conversion Permit approved by CAL FIRE or, if eligible, a Less</p>	C7-17

		<p>Than 3 Acre Conversion Exemption accepted by CAL FIRE.</p> <p>It is important to note that GDRCo’s ownership in Humboldt County represents hundreds of real estate transactions, both purchases and sales, beginning in approximately 1956. In other words, the GDRCo ownership did not always look as it does today. When acquired these lands had economic value not only as timberland but also as individual parcels. It is of importance to GDRCo that economic value is maintained for resource lands, especially to the extent that these lands had a certain economic value when acquired.</p> <p>If the County intends to accurately assess if resource lands are adequately protected, there must first be a comprehensive revision of Section 3.2 to more narrowly define what constitutes conversion of timberland, and what constitutes “fragmentation” or “parcelization” with detrimental effects on timber resources and ecology. Again, the 2003 FRAP Forest and Range 2003 Resource Report acknowledges 20 acre parcels as a defining mechanism, recognizing continued timber productivity and ecological benefits of parcels 20 acres or greater. The false narrative that Certificates of Compliance, Determinations of Status, and even the sale of individual patents or legal parcels constitute “conversion” of timberland with detrimental environmental effects should be removed from the discussion of timberland resources in Section 3.2. The discussion is not defined, has no definitional reference points, and is thus vague and in violation of EIR requirements under CEQA. (See Attachment B appended hereto).</p>	C7-17
#16	3.2-19	<p>The first paragraph of page 3.2-19 states that the General Plan Update (i.e. the Project) “...could include new policies which could facilitate conversion of farmland or forest land” is extremely speculative and unsupported. In the context of assessing Impacts and Mitigation Measures, only those policies which are included as part of the General Plan Update as presented in this RDEIR can be considered and/or evaluated. This language should be deleted from the RDEIR.</p>	C7-18
#17	3.2-19	<p>The fourth paragraph, last sentence of page 3.2-19 is misleading in that conversion of timberland does not directly result from the subdivision or the sale of individual patents or legal parcels.</p> <p>The subdivision of TPZ zoned lands is allowed down to a 40-acre minimum parcel size with an approved JTMP. The intent of a JTMP is to ensure that timber management is still viable subsequent to a subdivision being approved. The County should recognize that the conversion of timberland to a use other than growing timber requires, prior to conversion, a Timberland Conversion Permit approved by CAL FIRE or, if eligible, a Less Than 3 Acre Conversion Exemption accepted by CAL FIRE.</p> <p>Again, the sale of an individual patent or legal parcels does not in and of itself constitute conversion of timberland. As previously stated, the term Timberland Conversion should be limited to that which is provided in the Forest Practice Act (Title 14, Article 7).</p> <p>This sentence should be removed from the RDEIR.</p>	C7-19
#18	3.2-32	<p>Under the heading “Trinidad Planning Watershed, Changes from T” on page 3.2-32, the 42 acres referenced as being east of Big Lagoon is believed to be GDRCo property for</p>	C7-20

		<p>which GDRCo submitted a change in land use designation. GDRCo had initially made a request to have the land use designation changed from T to RE so that the land use would conform with what was an existing residential use. GDRCo no longer provides residential use of this approximately 42 acre property and subsequently requested that the land use be changed from T to CR, which was approved by the Board of Supervisors and is reflected in the current land use maps.</p> <p>Information provided under the Trinidad Planning Watershed, Changes from T should be revised to describe the change in land use for the approximately 42 acre property located east of Big Lagoon as changing from T to CR.</p>	
#19	3.2-34	<p>The last paragraph of page 3.2-34 contains the title <b>“Conversion as a result of increased parcelization and subsequent development”</b> which is materially misleading and unsubstantiated by the subsequent content.</p> <p>As previously stated, selling individual patents or legal parcels does not constitute conversion, nor does it constitute a change in parcel size. Patents and/or legal parcels can form the basis in which real property interests are held, with larger ownerships being comprised of multiple patents and/or legal parcels. While such properties may change ownership they are still available for resource production and it is up to the individual landowner and applicable zoning regulations as to how those resources are used and managed.</p> <p>The conversion of timberland to a use other than growing timber requires, prior to conversion, a Timberland Conversion Permit approved by CAL FIRE or, if eligible, a Less Than 3 Acre Conversion Exemption accepted by CAL FIRE.</p> <p>The term <b>“conversion”</b> should be removed from the subsection title—the RDEIR wholly fails to provide any definition to what constitutes actual <b>“fragmentation”</b> or what sized parcels cause these concerns and general commentary of this nature is not appropriate in an EIR.</p>	
#20	3.2-35	<p>In the first paragraph on page 3.2-35 regarding the density standard for patents and legal parcels it should be recognized that one dwelling unit per parcel is allowed regardless of whether the acreage meets the minimum parcel size (i.e. 160 acres for TPZ).</p> <p>Patents were originally established based upon the Public Land Survey System (PLSS) resulting in patents averaging approximately 160 acres +/- in size, upwards to 640 acres. The fact that a patent parcel is less than 160 acres should not be a basis for nonconformance. Furthermore, the Subdivision Map Act provides a process to recognize existing legal parcels with the understanding that said recognition does not constitute subdivision.</p> <p>Patents and/or legal parcels can form the basis in which real property interest are held, with larger ownerships being comprised of multiple patents and/or legal parcels. Selling individual patents or legal parcels does not constitute subdivision, nor does it violate the Subdivision Map Act. It is misleading for the County to insinuate that the compliance with the Subdivision Map Act is somehow being avoided through the recognition, sale or</p>	

C7-20

C7-21

C7-22

		<p>purchase of patents and/or legal parcels.</p> <p>This paragraph should be removed.</p>	C7-22
#21	3.2-35	<p>The discussion in the second paragraph on page 3.2-35 regarding patent parcels is both speculative and subjective. The Determination of Status process, as provided for by the Subdivision Map Act, is the only accurate means of establishing the number unaltered and altered patent parcels and defining base units of land. The last sentence in this paragraph should be revised to specify that any unaltered or altered patent parcel found to be in conformance with the Subdivision Map Act Determination of Status process would retain its historic rights. Any other assumption is contrary to law.</p>	C7-23
#22	3.2-35	<p>The discussion in the third paragraph on page 3.2-35 comingles the Determination of Status process (i.e. Certificates of Compliance) and development criteria which are not mutually exclusive.</p> <p>A Certificate of Compliance relates only to issues of compliance or noncompliance with the Subdivision Map Act and local ordinances enacted pursuant thereto. A Certificate of Compliance does not certify that the real property for which the certificate has been issued is suitable for development in accordance with existing or future regulations.</p> <p>The information provided in this paragraph should be revised to clearly state that the Determination of Status process is not contingent upon development criteria.</p>	C7-24
#23	3.2-35	<p>The first paragraph under “Other changes that could result in Conversion of Farmland or Forestland” on page 3.2-35 and discussion regarding conversion as used in the subsection title should be limited to the definition of Timberland Conversion as provided in the Forest Practice Act (Title 14, Article 7).</p>	C7-25
#24	3.2-36	<p>The third paragraph, first sentence of page 3.2-36 contains a general statement without sufficient facts to support the conclusion. Conflicts may occur however it must be recognized that timber harvesting is a relatively short-lived event with short term disruptions as compared to ongoing timber management activities and, as the 2003 FRAP Forest and Range 2003 Resource Report and updates clearly recognize, any “conflicts” greatly diminish on parcels in excess of 20 acres in size. Again the use of the term conversion should be limited to the definition of Timberland Conversion as provided in the Forest Practice Act (Title 14, Article 7).</p>	C7-26
#25	3.2-36	<p>The third paragraph, third sentence of page 3.2-36 should be changed as follows: the term “limiting incompatible uses” should be further clarified to state “limiting incompatible uses consistent with Government Code 51100-51104”.</p>	C7-27
#26	3.2-39	<p>The sixth paragraph, first sentence on page 3.2-39, regarding the use of the term “parcelization”, is again misleading. Neither the RDEIR nor the Board of Supervisors’ approved draft General Plan Update provides any definition for “parcelization”. If the term, as used in the first sentence of the sixth paragraph on page 3.2-39 of the RDEIR assumes that a Certificate of Compliance constitutes parcelization, then this is a false and</p>	C7-28

		<p>misleading statement and should be revised accordingly. Likewise, every conveyance of land constitutes a “parcelization” to some extent—the purpose of the EIR is analyze detrimental environmental effects, without evaluating parcel size relative to any discussion of “parcelization” and/or “fragmentation” renders the entire narrative vague and unsupported.</p>	C7-28
#27	3.2-39	<p>In the sixth paragraph, starting with the third sentence on page 3.2-39 and continuing onto page 3.2-40, the discussion assumes that the non-implementation of the Merger Ordinance will cause the “conversion” or “loss” of timberlands to rural residential uses. This assumption is entirely unsupported and the narrative in the RDEIR lacks context. Again, the 2003 FRAP Forest and Range 2003 Resource Report does provide context in this regard (i.e., recognizing density at less than 20 acres to cause fragmentation concerns), but the RDEIR makes no effort to define “parcelization” or “fragmentation” in a meaningful, substantive manner. The narrative is vague, unsupported and should be stricken.</p> <p>As previously stated, selling individual patents or legal parcels does not constitute conversion, nor does it constitute a change in parcel size. Patents and/or legal parcels can form the basis in which real property interest are held, with larger ownerships being comprised of multiple patents and/or legal parcels. While such properties may change ownership they are still available for resource production and it is up to the individual landowner as to how those resources are managed.</p> <p>The conversion of timberland to a use other than growing timber requires, prior to conversion, a Timberland Conversion Permit approved by CAL FIRE or, if eligible, a Less Than 3 Acre Conversion Exemption accepted by CAL FIRE.</p> <p>The fourth sentence of the sixth paragraph on page 3.2-39 should be deleted as it is not adequately substantiated.</p>	C7-29
#28	3.2-40	<p>The first paragraph on page 3.2-40 contains information that is misleading because the term “conversion” infers that the timber growing capacity of resource production lands is lost if used in conjunction with rural residential purposes. This gross generalization gives no consideration to parcel size and fails to recognize that these parcels likely retain the land use and zoning that support resource production and can provide ecological benefits as well, as expressly concluded in the 2003 FRAP Forest and Range 2003 Resource Report for parcels 20 acres or greater.</p> <p>As previously stated, selling individual patents or legal parcels does not constitute conversion, nor does it constitute a change in parcel size. Patents and/or legal parcels can form the basis in which real property interests are held, with larger ownerships being comprised of multiple patents and/or legal parcels. While such properties may change ownership they are still available for resource production and it is up to the individual landowner as to how those resources are managed.</p> <p>The conversion of timberland to a use other than growing timber requires, prior to conversion, a Timberland Conversion Permit approved by CAL FIRE or, if eligible, a Less Than 3 Acre Conversion Exemption accepted by CAL FIRE.</p>	C7-30

		<p>The finding provided here that there is a <b>significant unavoidable impact</b> is unsubstantiated and inaccurate if the County presumes (as the RDEIR text implies) that “conversion” occurs as a result of either the sale of individual patents/legal parcels or the residential use of timber resource lands. This implicit finding relies upon a false narrative without any context and should be re-evaluated by limiting the use of the term “conversion” in a manner that is consistent with the Forest Practice Act.</p>	C7-30
#29	3.2-40	<p>Fourth paragraph, first sentence; T as used at the end of this sentence should be revised to be TPZ.</p>	C7-31
#30	3.3-55	<p><b>Mitigation 3.3.3.2.a.</b>; It should be recognized that the mitigation proposed is an onerous undertaking and it is likely unrealistic that such an evaluation could be completed within a two-year timeframe. The County, under current State regulations, is required to evaluate critical watersheds.</p> <p>If <b>Mitigation 3.3.3.2.a.</b> is adopted the sole cost of completing said evaluation should be the responsibility of the County, not individual project applicants, and any failure on the part of the County to complete the evaluation within the specified two-year timeframe should not result in a de facto moratorium on development or any other project in a given watershed.</p>	C7-32
#31	3.11-17	<p><b>Impact 3.11.3.5. Habitat Conservation Plans</b>; suggest the first sentence under this subchapter be revised as follows:</p> <p><i>“Implementation of the General Plan Update <u>could</u> result in additional development that conflicts with adopted habitat conservation plans”.</i></p> <p>This suggested change is relevant considering that an HCP may provide for limited land use changes and therefore be an absolute conflict.</p>	C7-33
#32	3.11-18	<p>First paragraph, beginning with the fourth sentence; the information provided in the RDEIR herein is misleading and hyperbolic.</p> <p>As stated in Chapter 2 of the RDEIR, “The RDEIR is focused on the environmental effects which may reasonably be expected to occur during the 24-year planning period of the GPU, 2016-2024, as described in subchapters 2.1 and 2.5 below”. Table 2.5-1 on page 2-24 of the RDEIR provides the estimated number of dwelling units by land use designation that will be required to accommodate the estimated maximum feasible housing development and potential and projected development from 2016 to 2040. For lands planned T or TC the estimate provided is 44 housing units assuming that peak demand occurs in 2028. The discussion provided on page 3.11-17, under “<b>Analysis of Relevant General Plan Update Policies</b>”, should be limited to the scope of the Project as described in the RDEIR. The discussion which refers to the theoretical construction of as many as “20,000 dwelling units” on lands planned Timberlands (T) is completely hyperbolic and irrelevant as the analysis of relevant General Plan Update policies related to land planned T. Specifically, in order to maintain internal consistency, the number of dwelling units on lands zoned T considered in the RDEIR should be limited to the estimated 44 units as</p>	C7-34



		<p>identified in the RDEIR. The “20,000” unit assumption is entirely misplaced and without support. Furthermore, the presumption, as framed, violates accepted EIR scoping and project description standards under CEQA. (See legal opinion appended as Attachment B).</p> <p>The discussion provided under <b>Analysis of Relevant General Plan Update Policies</b> regarding the planned densities and theoretical maximum buildout of lands planned T to “20,000 units” should be removed as it is outside the scope of the Project as described in the RDEIR and it is not substantiated by any analysis elsewhere in the RDEIR.</p>
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C7-34

## **Attachment B**

### **Legal Opinion**

CLIFFORD B. MITCHELL (1927 - 2010)  
 PAUL A. BRISSO  
 NANCY K. DELANEY  
 JOHN M. VRIEZE  
 WILLIAM F. MITCHELL  
 RUSSELL S. GANS  
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EMERY F. MITCHELL (1896 - 1991)  
 WALTER J. CARTER (1949 - 1993)  
 R.C. DEDEKAM (1929 - 2011)

June 29, 2017

Craig Compton  
 Manager, Land Management & Business Development  
 Green Diamond Resource Company  
 P.O. Box 1089  
 Arcata, CA 95518

Re: Humboldt County General Plan Update Revised Environmental Impact  
 Report (dated April 19, 2017)

Dear Mr. Compton:

You requested that our law office review pertinent portions of the Humboldt County General Plan Update Revised Draft Environmental Impact Report (dated April 19, 2017) (the "RDEIR") prepared in accord with the California Environmental Quality Act ("CEQA") and provide a legal analysis and response to the following questions:

1. Does issuance of a Certificate of Compliance under the California Subdivision Map Act (California Government Code § 66410, et seq.) on real property parcels zoned for timber production ("TPZ"), timberland ("T"), or any form of agriculture (principally agriculture (AG) and/or agriculture exclusive (AE)) enable or entitle the owner of real property to "convert" the use(s) made of the property to something other than uses principally or conditionally permitted by the parcel's zoning classification?
2. Do the general references and discussion points contained in the RDEIR related to the "conversion", "parcelization" and/or "fragmentation" of timberlands and agricultural lands in the Agricultural and Timber Resources Chapter (Chapter 3.2) and elsewhere in the RDEIR satisfy requirements applicable to Environmental Impact Report preparation under the California Environmental Quality Act?

Each of these questions is answered, in turn, as follows:

**1. Certificate of Compliance Issuance Does Not Constitute Timberland Conversion**

The RDEIR repeatedly and erroneously equates the issuance of Certificates of Compliance under the California Subdivision Map Act (Calif. Government Code § 66410, et seq.) as a form of timberland or agricultural land “conversion.” Specifically, the discussion commences at page 3.2-11 of the RDEIR as follows: “[i]n addition to conversion occurring because of General Plan amendments and new subdivisions, resource lands may be converted 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.”

This “presumption” is not supported by substantial evidence, and it is contrary to established law. The issuance of a Certificate of Compliance does not, by itself, affect land use designations, zoning designations, or parcel size. (*See Gov. Code, § 66499.35* [Certificates of Compliance “relate[] *only to issues of compliance or noncompliance with the Subdivision Map Act and local ordinances enacted pursuant thereto.* The parcel described herein may be sold, leased, or financed without further compliance with the Subdivision Map Act or any local ordinance enacted pursuant thereto. *Development of the parcel may require issuance of a permit or permits, or other grant or grants of approval.*” (Emphasis added)].) The effect of a certificate is *limited* to legitimizing divisions of property that have *already occurred*. (*Save Mount Diablo v. Contra Costa County* (2015) 240 Cal.App.4th 1368, 1389, review denied (Jan. 20, 2016).)

Timberland conversion is an established, technical term. As the RDEIR appropriately recites, the recognized definition of the term “Timberland Conversion” appears in the California Forest Practices Act (“FPA”) and implementing regulations. (*See RDEIR at p. 3.2-14, citing Calif. Code of Regulations (“CCR”) Title 14, Article 7.*) In pertinent part, “Timberland Conversion” is defined as follows:

- (g) “Timberland Conversion”:
  - (1) Within non-Timberland Production Zone (TPZ) timberland, transforming timberland to a non-timber growing use through timber operations where:
    - (A) Future timber harvests will be prevented or infeasible because of land occupancy and activities thereon; or

- (B) Stocking requirements of the applicable district forest practice rules will not be met within five years after completion of timber operations; or
  - (C) There is a clear intent to divide timberland into ownerships of less than three acres (1.214 ha.).
- (2) Within TPZ lands, the immediate rezoning of TPZ lands, whether timber operations are involved or not except as exempt from a timberland conversion permit under 14 CCR 1104.1.

(14 CCR § 1100(g).)

Timberland conversion is *only* accomplished by way of a Timberland Conversion Permit or, if eligible, a Less Than 3 Acre Conversion Exemption, each of which the California Department of Forestry (“CAL FIRE”) has jurisdiction. (See Calif. Code of Regulations Title 14, Article 7.) The RDEIR seems to acknowledge this fact by correctly noting that the “Forest Practices Act . . . provides a legal definition of ‘timberland conversion’” and that such conversions are only accomplished through the issuance of permits or exemptions. (RDEIR pg. 3.2-14.) Nevertheless, the RDEIR then confuses the concept by assuming “another type of ‘conversion’ that is more difficult to define and track is the change in land management priorities based upon parcel size, market conditions and ownership values.” (RDEIR pg 3.2-15.) The RDEIR then proceeds with a lengthy narrative about assumed “conversion” caused by “[f]ragmentation and ‘parcelization’” of timberlands and further equates “conversion” with Certificate of Compliance and/or Conditional Certificate of Compliance issuance under the Subdivision Map Act. (RDEIR, pgs. 3.2-15-3.2-16.)

Despite the general commentary in the RDEIR, nothing about Certificate of Compliance issuance, Lot Line Adjustments or other non-divisional parcel adjustments “converts” any existing uses of land or create an entitlement to additional uses of land. The false narrative that Certificates of Compliance, Determinations of Status, and even the sale of individual patents or legal parcels constitute “conversion” of timberland or agricultural lands with detrimental environmental effects should be removed from the discussion of agricultural and timber resources in Chapter 3.2 of the RDEIR. There is no basis in law to equate Certificates of Compliance or legal parcel recognition as a form of timberland and/or agricultural land “conversion”. Moreover, as discussed immediately below, the assumption that “conversion” occurs as a result of the Certificate of

Compliance process is not supported by substantial evidence and is thus an improper consideration in the RDEIR.

2. **The RDEIR Discussion Regarding “Fragmentation” and “Parcelization” of Timberland Is Vague, Undefined and Not Supported by Substantial Evidence as Required by CEQA.**

It is well established that the findings in an Environmental Impact Report must be supported by “substantial evidence.” (Cal. Code Regs., tit. 14, § 15384.) “Substantial evidence” means “enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached.” (*Id.*) “Substantial evidence” does not include “argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate.” (*Id.*; see also Pub. Resources Code, § 21080(e)(2) and *Sierra Club v. California Dept. of Forestry and Fire Protection* (2007) 150 Cal.App.4th 370, 381.)

Of consequence, the RDEIR contains a protracted discussion about alleged “fragmentation” and “parcelization” of timberlands and agricultural lands and presumed adverse environmental consequences associated with these potential practices. (RDEIR at pgs. 3.2-15 through 3.2-18.) Rendering the discussion entirely vague and without context, the RDEIR makes no attempt to independently define the terms “fragmentation” or “parcelization”. Further complicating the confusion, in support of the discussion about “parcelization” the RDEIR cites the 2003 CAL FIRE and Resource Assessment Program’s (FRAP) Forest and Range 2003 Assessment. (RDEIR at p. 3.2-15, fn. 1.) The RDEIR’s reference to the 2003 Assessment is entirely misleading and without proper context, however, because the RDEIR materially omits the relevant discussion points and parcel size distinctions included in the 2003 Assessment.

Specifically, although the FRAP Forest and Range 2003 Assessment does include consideration of “fragmentation” and “parcelization” and the potential impacts that may consequently occur on agricultural and forest resources, nothing in the Assessment establishes any correlation to the history of the Certificate of Compliance process in Humboldt County recited in the RDEIR. Rather than provide support, the FRAP Forest and Range Assessment actually contradicts any such conclusion. Without justification, the RDEIR completely omits the discussion appearing in the FRAP Forest and Range 2003 Assessment regarding the *decrease/lack* of parcelization/fragmentation concerns associated with timberland and resource parcels 20 acres or greater. The following is an

excerpt from the 2003 FRAP Assessment which includes the identification of a category above “rural residential parcels (sized 20 acres or less)” which is described as “working/private parcels (sized 20 acres or greater)”, and recites the decreased fragmentation or “conversion” concerns associated with this larger parcel classification:

***Working/Private***

*Working/Private landscapes are those lands in private ownership with sparse housing density (less than one unit per 20 acres). They are used for a variety of purposes with commodity production often as the primary focus. These areas, where the role of private investment for production of energy, lumber, and livestock is coupled with supportive policy tools can potentially play the biggest role in maintaining lands in an unfragmented condition. In addition, these areas still provide for habitat restoration or management, recreation, and dispersed living space. These areas provide significant traditional ecosystem services as complements to the primary revenue producing management goals.*

As the 2003 FRAP Forest and Range Assessment clearly indicates, parcels with a housing density of one unit per 20 acres or greater **do not** constitute “fragmentation”, and, to the contrary, may play an important role in maintaining lands in an unfragmented condition and “provide significant traditional ecosystem services as complements to the primary revenue producing management goals”, as the Assessment concludes.

It should be noted that a subsequent FRAP Forest and Range Assessment was completed in 2010, and a FRAP Forest and Resource Assessment for 2015 is in the process of being completed. The FRAP 2010 Forest and Range Assessment provides updated definitions for both “parcelization” and “fragmentation” as follows:

***Parcelization:*** *The process of land ownership being broken into increasingly smaller tracts; by definition in the Assessment, housing density of one or more units per 20 acres and less than one unit per acre.*

***Fragmentation:*** *The process by which a contiguous land cover, vegetative community, or habitat is broken into smaller patches within a mosaic of other forms of land use/land cover, e.g., islands of an older forest age class immersed within areas of younger aged forest (Helms, 1998), or patches of oak woodlands surrounded by housing development.*

If any discussion is to be included in the EIR about “fragmentation” and/or “parcelization” of timberlands and agricultural lands, the conclusions about *decreased* fragmentation concerns on parcels sized 20 acres contained in the FRAP 2003 Assessment and 2010 update should be incorporated. All pertinent text included in the FRAP Assessment Reports (original and updated) should be included in the RDEIR. A “parcelization” discussion may be appropriate in the General Plan Update EIR provided a definition for the term is included and used consistently throughout the document. The 20 acre standard for “parcelization” and “fragmentation” definitions included and analyzed in the 2010 FRAP Assessment appears to provide an appropriate definition/reference.

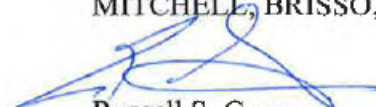
Additionally, as Humboldt County’s experience factor with the Certificate of Compliance process demonstrates, it is rare that the process yields the identification of parcels of land measuring less than 20 acres in size on parcels zoned T or TPZ.

In summary, the discussion regarding “fragmentation” and/or “parcelization” appearing at pages 3.2-15 through 3.2-18 of the RDEIR is vague, misleading, materially misquotes and ignores pertinent discussion points in the “evidence” cited (principally the CAL FIRE FRAP Assessments) and, as a whole, materially lacks “substantial evidence” to support the discussion about adverse environmental impacts associated with the Certificate of Compliance process and/or the sale and conveyance of patent parcels. As such, the discussion violates California Code of Regulations Title 14, § 15384, and should be deleted from the RDEIR.

As we have discussed, you indicated that GDRCo intends to submit this correspondence along with, and in support of, comments GDRCo is offering to the RDEIR. We acknowledge your right and authorization to do so.

Very truly yours,

MITCHELL, BRISSO, DELANEY & VRIEZE, LLP



Russell S. Gans



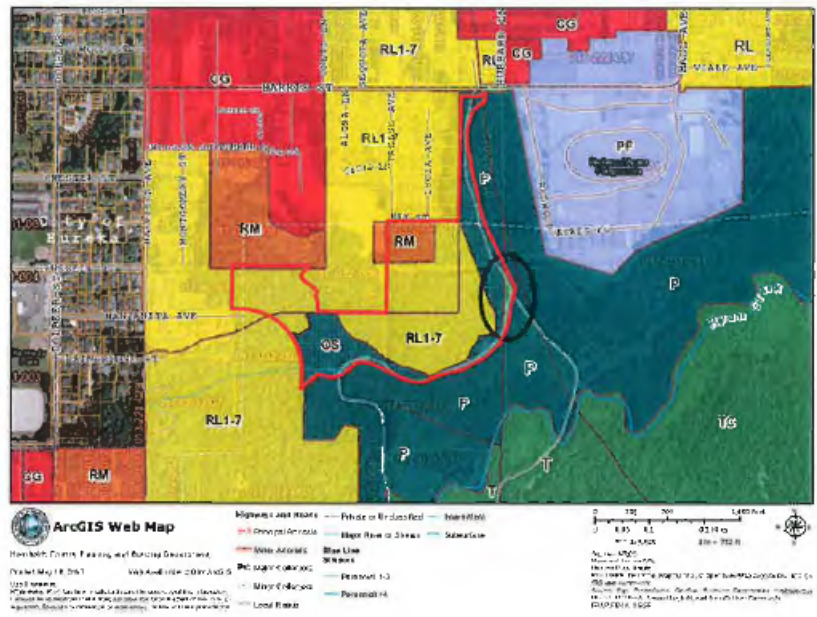
## **Attachment C**

Page 26 of 96 - GDRCo GPU RDEIR Comments

Land Use Request/Comments						
Appendix F: Map Book	Parcel	Name	Request	Attachment #	Land Use Designation	
					Appendix F: Map Book	Humboldt Web GIS
Eureka	017-032-014	Green Diamond Resource Company	Remove "T" portion in Web Map; change to OS	1	RL1-7, RM, OS	RL1-7, RM, OS, T
Eureka	303-012-005	Green Diamond Resource Company	Change RA5-20 to OS; Change OS (#2 on Attachment 4) to T	2	RL1-7, RA5-20, OS, T	RL1-7, RA5-20, OS, T
Indianola/Myrtle town	017-081-001	California Redwood Company	Change from IG to MG; within Coastal Zone	3	IG	IG
Indianola/Myrtle town	404-141-004	California Redwood Company	Remove NR and change to MG	4	MG;NR	MG;NR
Scotia/Rio Dell	205-031-047	Green Diamond Resource Company	Change from RA5-20 to RA5-20/UR	5	RA5-20	RA5-20
Central	311-171-007	Green Diamond Resource Company	Change from T to IR	6	no good view	T
Big Lagoon/Patrick's Point	517-142-014	Green Diamond Resource Company	Change from RE1-5 to CR	7	RE1-5	RE1-5
Northern Humboldt	518-053-006	Green Diamond Resource Company	Change portion that is P to T	8	T, P	T, P

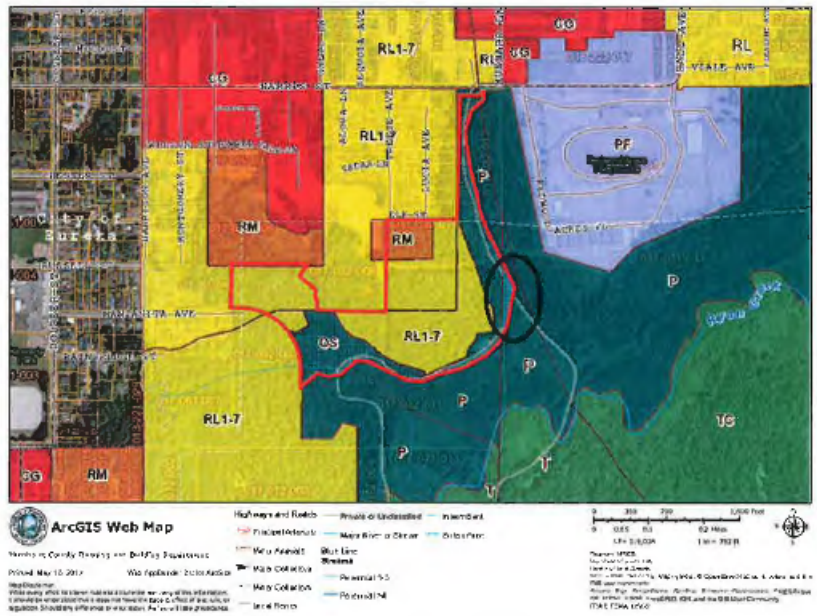
**Attachment # 1**  
 **Parcel 017-032-014**

County Land Use Map



Comment: Change T portion to OS

Board of Supervisors Approved Land Use





**Attachment # 3**  
 **Parcel 017-081-001**

County Land Use Map



Comment: Change IG to MG; this parcel is within coastal zone

Board of Supervisors Approved Land Use



**Attachment # 4**  
 **Parcel 404-141-004**

County Land Use Map



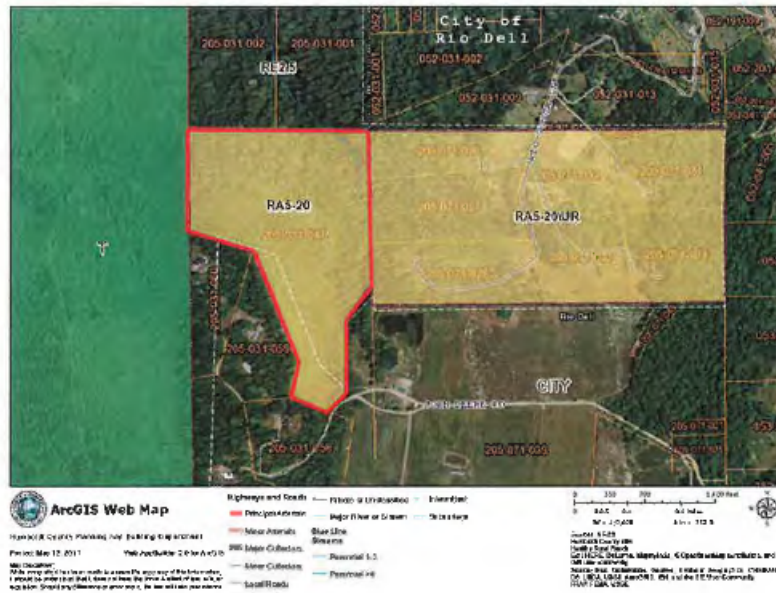
Comment: Remove NR mapping error & replace with MG

Board of Supervisors Approved Land Use



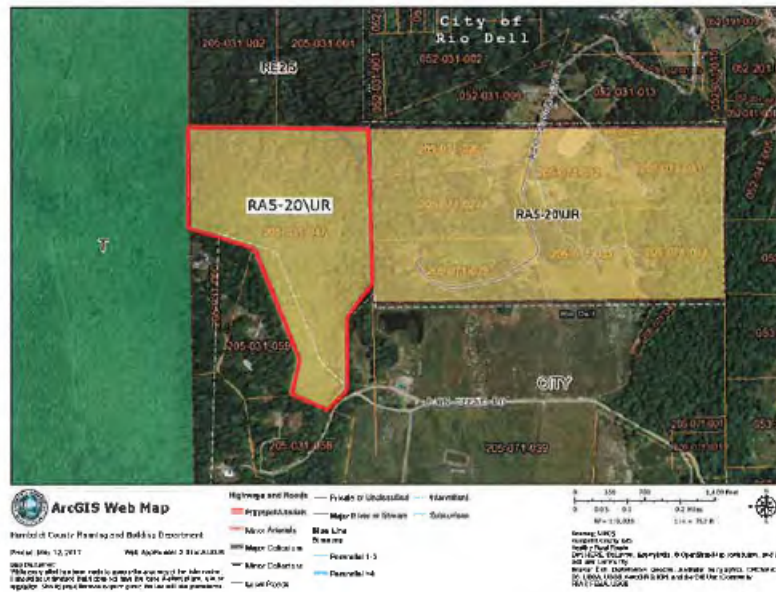
**Attachment # 5**  
 **Parcel 205-031-047**

County  
Land Use  
Map



Comment: Change RAS-20 to RAS-20/UR

Board of  
Supervisors  
Approved  
Land Use



Attachment # 6  
Parcel 311-171-007

County  
Land Use  
Map



Comment: Change T to IR

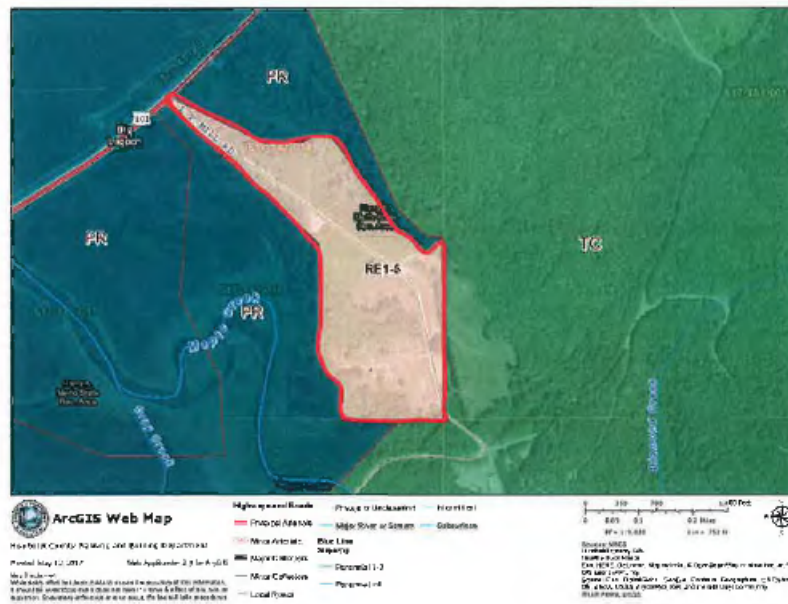
Board of  
Supervisors  
Approved  
Land Use





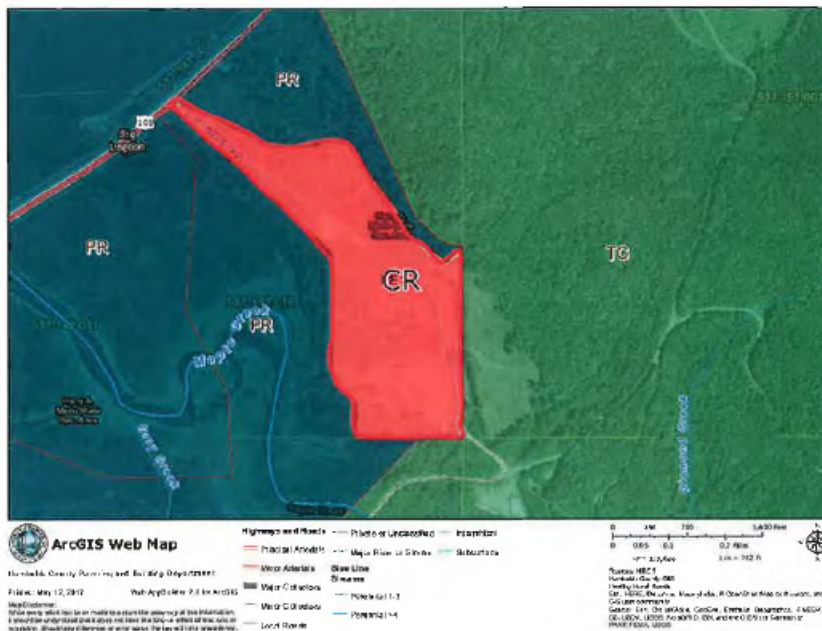
**Attachment # 7**  
 **Parcel 517-142-014**

County  
Land Use  
Map



**Comment: Change RE1-5 to CR**

Board of  
Supervisors  
Approved  
Land Use





**Attachment D**

YTHR2 REPORT Y1-36  
YTR90-96.XLS

CALIFORNIA TIMBER HARVEST BY COUNTY  
1QTR 1994 TO 4QTR 1994

5/19/95

COUNTY	TIMBER HARVEST VOLUME			HARVEST VALUE		
	(NET MBF)	% of STATE	% GVT	DOLLARS	% of STATE	% GVT
ALAMEDA	0	0.00%	0	\$ 18,583	0.00%	0
ALPINE	18	0.00%	0	2,226	0.00%	0
AMADOR	26,232	1.13%	2.58	12,405,411	1.12%	1.75
BUTTE	97,724	4.23%	1.57	48,693,611	4.41%	1.82
CALAVERAS	49,663	2.14%	4.45	24,538,370	2.22%	13.38
COLUSA	371	0.02%	0	163,475	0.01%	0
CONTRA COSTA	0	0.00%	0	32,435	0.00%	0
DEL NORTE	83,434	3.60%	7.51	52,796,735	4.79%	6.44
EL DORADO	129,130	5.57%	12.82	57,354,713	5.20%	11.23
FRESNO	19,213	0.83%	45.79	7,282,874	0.66%	49.49
GLENN	8,557	0.37%	25.76	3,890,732	0.35%	26.90
HUMBOLDT	488,742	21.10%	0.43	283,784,143	25.73%	0.41
IMPERIAL	0	0.00%	0	-	0.00%	0
INYO	0	0.00%	0	-	0.00%	0
KERN	3,438	0.15%	7.13	1,349,254	0.12%	7.92
KINGS	0	0.00%	0	-	0.00%	0
LAKE	7,627	0.33%	0.09	3,668,181	0.33%	0.09
LASSEN	125,854	5.43%	41.93	43,524,101	3.95%	50.74
LOS ANGELES	0	0.00%	0	147,935	0.01%	0
MADERA	12,852	0.55%	71.16	4,704,120	0.43%	70.66
MARIN	0	0.00%	0	2,742	0.00%	0
MARIPOSA	2,899	0.13%	6.59	1,055,669	0.10%	6.90
MENDOCINO	227,422	9.82%	3.82	124,594,482	11.29%	3.83
MERCED	0	0.00%	0	14,020	0.00%	0
MODOC	90,354	3.90%	39.54	35,459,179	3.21%	50.55
MONO	5,875	0.17%	100.00	2,136,627	0.19%	99.72
MONTEREY	0	0.00%	0	18,543	0.00%	0
NAPA	335	0.01%	0	170,665	0.02%	0
NEVADA	44,108	1.90%	7.96	17,730,390	1.61%	6.77
ORANGE	0	0.00%	0	52,349	0.00%	0
PLACER	55,668	2.40%	2.69	25,026,152	2.27%	2.61
PLUMAS	104,784	4.52%	36.54	45,736,250	4.15%	33.73
RIVERSIDE	0	0.00%	0	28,203	0.00%	0
SACRAMENTO	0	0.00%	0	27,082	0.00%	0
SAN BENITO	0	0.00%	0	3,246	0.00%	0
SAN BERNARDINO	22	0.00%	0	50,589	0.00%	0.20
SAN DIEGO	0	0.00%	0	14,102	0.00%	0
SAN FRANCISCO	0	0.00%	0	-	0.00%	0
SAN JOAQUIN	0	0.00%	0	40,507	0.00%	0
SAN LUIS OBISPO	0	0.00%	0	16,110	0.00%	0
SAN MATEO	7,540	0.33%	0	4,257,679	0.39%	0
SANTA BARBARA	0	0.00%	0	18,476	0.00%	0
SANTA CLARA	2,941	0.13%	0	1,718,871	0.16%	0
SANTA CRUZ	22,835	0.99%	0	12,190,062	1.11%	0.08
SHASTA	177,795	7.68%	7.56	65,069,765	5.90%	10.83
SIERRA	34,619	1.49%	47.87	13,764,056	1.25%	48.50
SISKIYOU	180,277	7.78%	28.37	62,684,946	5.68%	28.79
SOLANO	0	0.00%	0	19,495	0.00%	0
SONOMA	28,042	1.21%	0	14,770,260	1.34%	0
STANISLAUS	0	0.00%	0	546	0.00%	0
SUTTER	0	0.00%	0	2,940	0.00%	0
TEHAMA	56,318	2.43%	18.07	27,386,335	2.48%	21.89
TRINITY	94,935	4.10%	4.71	44,533,459	4.04%	5.37
TULARE	12,998	0.56%	52.77	4,635,321	0.42%	54.64
TUOLUMNE	93,489	4.04%	40.92	44,482,903	4.03%	44.27
VENTURA	0	0.00%	0	92,030	0.01%	0
YOLO	0	0.00%	0	6,530	0.00%	0
YUBA	22,217	0.95%	7.36	10,954,938	0.99%	7.17
ALL COUNTIES	2,316,328	100.00%	14.53	\$ 1,103,121,518	100.00%	13.46

YTHR2 REPORT YT-36  
YTR90-96.XLS

CALIFORNIA TIMBER HARVEST BY COUNTY  
1QTR 1995 TO 4QTR 1995

4/10/96

COUNTY	TIMBER HARVEST VOLUME			HARVEST VALUE		
	(NKT MBF)	% of STATE	% GVT	DOLLARS	% of STATE	% GVT
ALAMEDA	0	0.00%		\$ 24,876	0.00%	0.00
ALPINE	152	0.01%	82.24	39,032	0.00%	91.19
AMADOR	22,402	0.97%	1.21	8,787,413	0.93%	1.20
BUTTE	91,686	3.93%	4.26	38,874,228	4.11%	4.56
CALAVERAS	54,359	2.36%	5.55	20,128,129	2.13%	6.40
COLUSA	813	0.04%	0.00	380,480	0.04%	0.00
CONTRA COSTA	0	0.00%		45,671	0.00%	0.00
DEL NORTE	64,036	2.78%	0.15	37,845,052	4.00%	0.22
EL DORADO	124,584	5.41%	9.14	45,799,948	4.84%	7.03
FRESNO	49,471	1.76%	66.56	11,463,244	1.21%	62.94
GLENN	10,582	0.46%	0.00	4,040,026	0.43%	0.00
HUMBOLDT	491,765	21.34%	1.54	235,528,930	24.91%	1.29
IMPERIAL	0	0.00%		-	0.00%	
INYO	0	0.00%	0.00	-	0.00%	0.00
KERN	33	0.00%	0.00	24,013	0.00%	0.00
KINGS	0	0.00%		-	0.00%	
LAKE	7,430	0.32%	0.27	2,749,906	0.29%	0.07
LASSEN	86,040	3.73%	56.74	26,920,865	2.85%	58.93
LOS ANGELES	0	0.00%		141,850	0.02%	0.00
MADERA	5,006	0.22%	23.37	1,635,437	0.17%	18.58
MARIN	3	0.00%	0.00	165	0.00%	0.00
MARIPOSA	4,879	0.21%	1.87	1,717,603	0.18%	1.14
MENDOCINO	211,583	9.18%	7.46	88,250,808	9.34%	7.53
MERCED	0	0.00%		14,592	0.00%	0.00
MODOC	56,750	2.46%	57.20	19,889,877	2.10%	69.74
MONO	9,864	0.43%	100.00	5,378,100	0.57%	99.88
MONTEREY	0	0.00%		29,927	0.00%	0.00
NAPA	890	0.04%	1.01	358,866	0.04%	0.34
NEVADA	51,681	2.24%	5.66	16,978,948	1.80%	4.59
ORANGE	0	0.00%		10,680	0.00%	0.00
PLACER	54,673	2.37%	12.17	20,822,416	2.20%	11.20
PLUMAS	145,302	6.31%	40.45	61,418,586	6.50%	46.11
RIVERSIDE	0	0.00%		36,710	0.00%	0.00
SACRAMENTO	0	0.00%		26,655	0.00%	0.00
SAN BENITO	0	0.00%		-	0.00%	0.00
SAN BERNARDINO	53	0.00%	0.00	59,609	0.01%	0.13
SAN DIEGO	0	0.00%		12,480	0.00%	0.00
SAN FRANCISCO	0	0.00%		-	0.00%	
SAN JOAQUIN	0	0.00%		36,123	0.00%	0.00
SAN LUIS OBISPO	0	0.00%		20,873	0.00%	0.00
SAN MATEO	3,416	0.15%	0.00	1,704,274	0.18%	0.00
SANTA BARBARA	0	0.00%		16,560	0.00%	0.00
SANTA CLARA	1,264	0.05%	0.00	534,581	0.06%	0.00
SANTA CRUZ	26,596	1.15%	0.02	11,034,193	1.17%	0.01
SHASTA	149,734	6.50%	4.68	55,224,722	5.84%	5.12
SIERRA	62,828	2.73%	74.45	17,661,630	1.87%	66.32
SISKIYOU	187,365	8.13%	15.86	62,903,537	6.65%	18.54
SOLANO	0	0.00%		21,244	0.00%	0.00
SONOMA	26,330	1.14%	0.00	11,608,759	1.23%	0.00
STANISLAUS	0	0.00%		3,378	0.00%	0.00
SUTTER	0	0.00%		461	0.00%	0.00
TEHAMA	82,028	3.56%	4.11	33,881,745	3.58%	3.66
TRINITY	114,193	4.96%	16.30	53,482,405	5.66%	16.63
TULARE	10,572	0.46%	80.73	3,534,893	0.37%	84.83
TUOLUMNE	78,593	3.41%	35.51	32,511,664	3.44%	45.31
VENTURA	11	0.00%	0.00	83,797	0.01%	0.00
YOLO	0	0.00%		7,793	0.00%	0.00
YUBA	26,286	1.14%	3.27	11,648,909	1.23%	4.03
<b>ALL COUNTIES</b>	<b>2,304,253</b>	<b>100.00%</b>	<b>16.27</b>	<b>\$ 945,346,063</b>	<b>100.00%</b>	<b>15.13</b>

YTHR2 REPORT YT-36  
YTR90-96.X1.S

**CALIFORNIA TIMBER HARVEST BY COUNTY**  
IQTR 1996 TO 4QTR 1996

5/10/97

COUNTY	TIMBER HARVEST VOLUME			HARVEST VALUE		
	(NET MDF)	% of STATE	% GVT	DOLLARS	% of STATE	% GVT
ALAMEDA	0	0.00%		\$ 25,660	0.00%	0
ALPINE	147	0.01%	87.76	31,300	0.00%	94.70
AMADOR	34,798	1.53%	0.07	12,371,176	1.34%	0.05
BUTTE	96,967	4.27%	0.19	40,416,538	4.39%	0.08
CALAVERAS	52,595	2.31%	11.32	18,618,868	2.02%	10.73
COLUSA	264	0.02%	0	159,920	0.02%	0
CONTRA COSTA	0	0.00%		28,181	0.00%	0
DEL NORTE	60,105	2.64%	1.43	34,856,451	3.78%	1.02
EL DORADO	73,140	3.22%	14.72	25,675,978	2.79%	13.12
FRESNO	38,441	1.69%	56.73	10,650,447	1.16%	49.04
GLENN	8,085	0.36%	8.94	2,591,540	0.28%	5.03
HUMBOLDT	517,524	22.72%	1.48	253,521,839	27.53%	0.62
IMPERIAL	0	0.00%		-	0.00%	
INYO	0	0.00%		-	0.00%	
KERN	3,707	0.16%	84.87	1,632,793	0.18%	87.29
KINGS	0	0.00%		-	0.00%	
LAKE	17,956	0.79%	21.79	5,419,756	0.59%	30.48
LASSEN	65,278	2.87%	37.57	23,173,584	2.52%	40.17
LOS ANGELES	0	0.00%		109,516	0.01%	0
MADERA	5,504	0.24%	83.50	1,225,455	0.13%	78.64
MARIN	68	0.00%	0	2,711	0.00%	0
MARIPOSA	3,390	0.15%	2.09	1,133,145	0.12%	1.12
MENDOCINO	275,589	12.12%	9.31	118,836,711	12.90%	16.27
MERCED	0	0.00%		8,760	0.00%	0
MODOC	30,342	1.33%	54.00	11,777,828	1.28%	50.79
MONO	3,363	0.15%	97.92	1,513,998	0.16%	98.25
MONTEREY	0	0.00%		14,923	0.00%	0
NAPA	1,803	0.08%	0	658,767	0.07%	0
NEVADA	61,832	2.72%	7.85	20,258,258	2.20%	7.22
ORANGE	0	0.00%		60,271	0.01%	0
PLACER	49,285	2.17%	5.22	16,508,086	1.79%	5.67
PLUMAS	105,651	4.65%	9.58	36,838,955	4.00%	8.94
RIVERSIDE	0	0.00%		26,412	0.00%	0
SACRAMENTO	0	0.00%		31,173	0.01%	0
SAN BENITO	0	0.00%		-	0.00%	
SAN BERNARDINO	79	0.00%	0	50,479	0.01%	0
SAN DIEGO	0	0.00%		20,121	0.00%	0
SAN FRANCISCO	26	0.00%	0	26	0.00%	0
SAN JOAQUIN	0	0.00%		33,772	0.00%	0
SAN LUIS OBISPO	0	0.00%		19,398	0.00%	0
SAN MATEO	7,170	0.32%	0	3,686,595	0.40%	0
SANTA BARBARA	0	0.00%		11,520	0.00%	0
SANTA CLARA	2,657	0.12%	0	1,327,457	0.14%	0
SANTA CRUZ	25,394	1.12%	0	11,508,367	1.25%	0
SHASTA	167,977	7.39%	7.15	57,279,061	6.22%	8.86
SIERRA	58,327	2.57%	40.41	16,760,501	1.82%	33.48
SISKIYOU	178,701	7.86%	24.05	63,935,125	6.94%	22.43
SOLANO	0	0.00%		17,580	0.00%	0
SONOMA	32,698	1.44%	6.27	14,059,967	1.53%	6.47
STANISLAUS	0	0.00%		814	0.00%	0
SUTTER	3	0.00%	0	3	0.00%	0
TEHAMA	103,753	4.56%	3.35	40,276,583	4.37%	3.52
TRINITY	73,808	3.25%	41.31	30,363,344	3.30%	44.48
TULARE	9,603	0.42%	87.16	3,509,824	0.38%	91.81
TUOLUMNE	73,662	3.24%	23.27	26,067,788	2.83%	23.50
VENTURA	0	0.00%		83,653	0.01%	0
YOLO	0	0.00%		4,666	0.00%	0
YUBA	33,136	1.46%	0.99	13,752,569	1.49%	0.75
<b>ALL COUNTIES</b>	<b>2,272,928</b>	<b>100%</b>	<b>12.66</b>	<b>\$ 920,942,815</b>	<b>100%</b>	<b>11.05</b>

CALIFORNIA TIMBER HARVEST BY COUNTY

REPORT Y1-36

4/17/98

Y1R90-97.XLS

1QTR 1997 TO 4QTR 1997

COUNTY	TIMBER HARVEST VOLUME			HARVEST VALUE		
	(NET MBF)	% of STATE	% GVT	DOLLARS	% of STATE	% GVT
ALAMEDA	-	0.00%	0.00	\$ 26,592	0.00%	0
ALPINE	3,710	0.15%	18.89	422,533	0.05%	18.88
AMADOR	20,064	0.84%	20.29	5,902,553	0.68%	15.73
BUTTE	91,606	3.82%	4.58	32,603,394	3.76%	2.41
CALAVERAS	61,092	2.55%	3.08	20,183,738	2.33%	2.79
COLUSA	281	0.01%	0.00	88,920	0.01%	0
CONTRA COSTA	-	0.00%	0.00	17,408	0.00%	0
DEL NORTE	46,658	1.94%	0.77	23,819,084	2.74%	0.64
EL DORADO	91,892	3.83%	22.18	27,049,500	3.12%	18.64
FRESNO	23,227	0.97%	57.78	6,146,102	0.71%	56.11
GLENN	18,944	0.79%	19.10	6,854,614	0.79%	9.64
HUMBOLDT	531,151	22.13%	2.16	238,010,572	27.43%	1.46
IMPERIAL	-	0.00%	-	-	0.00%	-
INYO	437	0.02%	100.00	216,785	0.02%	100.00
KERN	1,662	0.07%	15.04	353,863	0.04%	11.61
KINGS	-	0.00%	-	-	0.00%	-
LAKE	15,233	0.63%	8.41	4,105,171	0.47%	8.82
LASSEN	52,279	2.18%	38.72	17,421,558	2.01%	34.45
LOS ANGELES	-	0.00%	0.00	39,801	0.00%	0
MADIRA	9,978	0.42%	79.29	2,413,335	0.28%	79.89
MARIN	-	0.00%	-	-	0.00%	-
MARIPOSA	4,823	0.20%	13.02	1,152,380	0.13%	10.78
MENDOCINO	243,866	10.16%	13.87	94,772,858	10.92%	13.07
MERCED	-	0.00%	0.00	7,792	0.00%	0
MODOC	41,906	1.75%	44.17	13,885,584	1.60%	39.09
MONO	527	0.02%	100.00	225,975	0.03%	99.77
MONTÉREY	-	0.00%	0.00	10,655	0.00%	0
NAPA	771	0.03%	0.00	232,805	0.03%	0
NEVADA	75,818	3.16%	12.29	22,389,516	2.58%	11.90
ORANGE	-	0.00%	0.00	55,192	0.01%	0
PLACER	51,211	2.13%	30.19	16,380,617	1.89%	29.37
PLUMAS	147,794	6.16%	27.83	46,097,875	5.31%	26.31
RIVERSIDE	-	0.00%	0.00	16,313	0.00%	0
SACRAMENTO	-	0.00%	0.00	33,465	0.00%	0
SAN BENITO	-	0.00%	-	-	0.00%	-
SAN BERNARDINO	132	0.01%	0.00	40,194	0.00%	0
SAN DIEGO	-	0.00%	0.00	5,675	0.00%	0
SAN FRANCISCO	-	0.00%	-	-	0.00%	-
SAN JOAQUIN	-	0.00%	0.00	26,147	0.00%	0
SAN LUIS OBISPO	-	0.00%	0.00	16,944	0.00%	0
SAN MATEO	8,022	0.33%	0.00	3,575,135	0.41%	0
SANTA BARBARA	-	0.00%	0.00	10,800	0.00%	0
SANTA CLARA	1,185	0.05%	0.00	510,373	0.06%	0
SANTA CRUZ	26,465	1.10%	0.00	10,450,097	1.20%	0
SHASTA	151,040	6.29%	10.03	47,344,813	5.46%	8.74
SIERRA	43,398	1.81%	29.13	12,963,823	1.49%	26.63
SISKIYOU	250,804	10.45%	25.45	83,427,613	9.61%	21.38
SOLANO	-	0.00%	0.00	12,399	0.00%	0
SONOMA	31,739	1.32%	0.52	11,137,205	1.28%	0.05
STANISLAUS	-	0.00%	0.00	684	0.00%	0
SUTTER	-	0.00%	-	-	0.00%	-
TEHAMA	113,011	4.71%	1.48	39,713,257	4.58%	1.29
TRINITY	98,512	4.11%	19.19	34,024,664	3.92%	17.24
TULARE	9,272	0.39%	73.18	2,176,527	0.25%	69.44
TUOLUMNE	90,149	3.76%	26.02	26,356,524	3.04%	21.44
VENTURA	-	0.00%	0.00	58,526	0.01%	0
YOLO	-	0.00%	-	-	0.00%	-
YUBA	41,013	1.71%	12.37	14,915,864	1.72%	11.51
<b>ALL COUNTIES</b>	<b>2,399,672</b>	<b>100%</b>	<b>14.89</b>	<b>\$867,735,094</b>	<b>100%</b>	<b>11.77</b>

REPORT YT-36  
YTR90-97.XLS

CALIFORNIA TIMBER HARVEST BY COUNTY  
IQTR 1998 TO 4QTR 1998

4/13/99

COUNTY	TIMBER HARVEST VOLUME			HARVEST VALUE		
	(NET MBF)	% of STATE	% GVT	DOLLARS	% of STATE	% GVT
ALAMEDA	-	0.00%	0.00	\$ 25,209	0.00%	0
ALPINE	312	0.01%	56.41	68,930	0.01%	51.04
AMADOR	22,680	1.56%	18.04	9,721,692	1.28%	104.7
BUTTE	97,495	4.66%	1.61	33,670,434	4.44%	1.36
CALAVERAS	53,691	2.57%	2.36	16,715,511	2.20%	1.42
COLUSA	150	0.01%	0.00	37,370	0.00%	0.00
CONTRA COSTA	-	0.00%	0.00	16,323	0.00%	0.00
DEL NORTE	47,164	2.26%	3.05	23,385,403	3.08%	2.29
EL DORADO	99,514	4.76%	31.03	27,640,268	3.64%	21.74
FRESNO	21,010	1.00%	63.26	5,907,319	0.78%	61.84
GLENN	28,800	1.38%	15.92	10,697,843	1.41%	19.60
HUMBOLDT	450,629	21.55%	1.33	203,494,572	26.81%	1.01
IMPERIAL	-	0.00%	0.00	-	0.00%	0.00
INYO	-	0.00%	0.00	-	0.00%	0.00
KERN	2,632	0.13%	0.34	672,646	0.09%	0.11
KINGS	-	0.00%	0.00	-	0.00%	0.00
LAKE	16,454	0.79%	59.86	4,520,045	0.60%	58.92
LASSEN	56,239	2.69%	28.84	19,350,286	2.55%	30.37
LOS ANGELES	-	0.00%	0.00	15,133	0.00%	0.00
MADERA	8,982	0.43%	92.63	2,141,611	0.28%	92.97
MARIN	-	0.00%	0.00	-	0.00%	0.00
MARIPOSA	4,246	0.20%	0.60	1,304,514	0.17%	0.00
MENDOCINO	225,878	10.80%	1.15	96,490,920	12.71%	0.83
MERCED	-	0.00%	0.00	8,740	0.00%	0.00
MODOC	18,752	0.90%	47.34	5,997,939	0.79%	50.32
MONO	4,836	0.23%	96.79	2,458,635	0.32%	98.71
MONTEREY	-	0.00%	0.00	10,801	0.00%	0.00
NAPA	860	0.04%	0.00	236,523	0.03%	0.00
NEVADA	60,854	2.91%	24.74	19,037,475	2.51%	23.02
ORANGE	-	0.00%	0.00	53,503	0.01%	0.00
PLACER	65,320	3.12%	22.18	19,628,305	2.59%	17.18
PLUMAS	109,038	5.22%	14.42	33,740,915	4.45%	11.88
RIVERSIDE	-	0.00%	0.00	26,619	0.00%	0.00
SACRAMENTO	-	0.00%	0.00	33,786	0.00%	0.00
SAN BENITO	-	0.00%	0.00	-	0.00%	0.00
SAN BERNARDINO	100	0.00%	0.00	43,459	0.01%	0.00
SAN DIEGO	-	0.00%	0.00	15,066	0.00%	0.00
SAN FRANCISCO	-	0.00%	0.00	-	0.00%	0.00
SAN JOAQUIN	-	0.00%	0.00	27,792	0.00%	0.00
SAN LUIS OBISPO	-	0.00%	0.00	17,458	0.00%	0.00
SAN MATEO	3,561	0.17%	0.00	1,557,316	0.21%	0.00
SANTA BARBARA	-	0.00%	0.00	10,080	0.00%	0.00
SANTA CLARA	848	0.04%	0.00	436,179	0.05%	0.00
SANTA CRUZ	22,365	1.07%	0.18	8,928,905	1.18%	0.27
SHASTA	148,935	7.12%	4.48	47,668,627	6.28%	3.14
SIERRA	21,757	1.04%	35.47	6,387,532	0.84%	34.72
SISKIYOU	189,237	9.05%	24.52	59,346,549	7.82%	23.69
SOLANO	-	0.00%	0.00	14,686	0.00%	0.00
SONOMA	20,509	0.98%	0.00	7,768,131	1.02%	0.00
STANISLAUS	-	0.00%	0.00	648	0.00%	0.00
SUTTER	-	0.00%	0.00	-	0.00%	0.00
TEHAMA	83,428	3.99%	5.26	28,648,349	3.77%	4.60
TRINITY	109,905	5.26%	15.16	35,846,666	4.72%	14.46
TULARE	8,362	0.40%	58.97	2,212,659	0.29%	68.09
TUOLUMNE	53,455	2.56%	9.30	15,282,428	2.01%	5.01
VENTURA	-	0.00%	0.00	74,680	0.01%	0.00
YOLO	-	0.00%	0.00	-	0.00%	0.00
YUBA	22,716	1.09%	6.71	7,649,761	1.01%	3.59
<b>ALL COUNTIES</b>	<b>2,690,715</b>	<b>100%</b>	<b>12.16</b>	<b>\$759,026,241</b>	<b>100%</b>	<b>9.41</b>



CALIFORNIA TIMBER HARVEST BY COUNTY

REPORT Y1-36

3/29/00

Y130-59.XLS

1QTR 1999 TO 4QTR 1999

COUNTY	TIMBER HARVEST VOLUME			HARVEST VALUE		
	(NET MBF)	% of STATE	% GVT	DOLLARS	% of STATE	% GVT
ALAMEDA	-	0.00%	0.00	\$ 23,006	0.00%	0.00
ALPINE	110	0.01%	0.00	32,250	0.00%	0.00
AMADOR	28,867	1.35%	17.80	8,448,057	3.11%	14.98
BUTTE	90,918	4.24%	0.11	29,484,325	3.86%	0.09
CALAVERAS	66,963	3.12%	6.69	19,908,264	2.61%	5.35
COLUSA	133	0.01%	0.00	39,579	0.01%	0.00
CONTRA COSTA	-	0.00%	0.00	15,732	0.00%	0.00
DEL NORTE	51,088	2.38%	0.00	26,034,856	3.41%	0.00
EL DORADO	126,065	5.88%	40.22	31,760,948	4.16%	28.31
FRESNO	31,683	1.48%	69.91	8,775,155	1.15%	65.64
GLENN	29,728	1.39%	0.92	9,385,474	1.23%	0.74
HUMBOLDT	386,496	18.03%	1.62	181,480,903	23.76%	0.79
IMPERIAL	-	0.00%	0.00	-	0.00%	0.00
INYO	-	0.00%	0.00	-	0.00%	0.00
KERN	3,763	0.18%	21.47	1,032,180	0.14%	12.48
KINGS	-	0.00%	0.00	-	0.00%	0.00
LAKE	5,017	0.23%	2.67	1,500,886	0.20%	1.85
LASSEN	63,800	2.98%	24.63	17,110,506	2.24%	17.51
LOS ANGELES	-	0.00%	0.00	14,719	0.00%	0.00
MADERA	8,228	0.38%	57.41	2,081,929	0.27%	52.06
MARIN	-	0.00%	0.00	-	0.00%	0.00
MARIPOSA	3,529	0.16%	0.00	1,003,910	0.13%	0.00
MENDOCINO	227,515	10.61%	0.46	105,683,106	13.84%	0.39
MERCED	-	0.00%	0.00	9,694	0.00%	0.00
MODOC	23,247	1.08%	6.59	7,266,508	0.95%	6.23
MONO	-	0.00%	0.00	20,265	0.00%	98.00
MONTEREY	-	0.00%	0.00	9,976	0.00%	0.00
NAPA	1,318	0.06%	0.00	354,725	0.05%	0.00
NEVADA	45,007	2.10%	24.64	13,600,777	1.78%	22.85
ORANGE	-	0.00%	0.00	7,056	0.00%	0.00
PLACER	41,997	1.96%	26.79	11,829,946	1.55%	20.68
PLUMAS	176,830	8.25%	14.60	52,587,704	6.89%	12.10
RIVERSIDE	-	0.00%	0.00	27,121	0.00%	0.00
SACRAMENTO	-	0.00%	0.00	24,026	0.00%	0.00
SAN BENITO	-	0.00%	0.00	-	0.00%	0.00
SAN BERNARDINO	-	0.00%	0.00	15,289	0.00%	0.00
SAN DIEGO	-	0.00%	0.00	12,958	0.00%	0.00
SAN FRANCISCO	-	0.00%	0.00	-	0.00%	0.00
SAN JOAQUIN	-	0.00%	0.00	17,543	0.00%	0.00
SAN LUIS OBISPO	-	0.00%	0.00	18,377	0.00%	0.00
SAN MATEO	4,675	0.22%	0.00	2,440,280	0.32%	0.00
SANTA BARBARA	-	0.00%	0.00	5,040	0.00%	0.00
SANTA CLARA	3,430	0.16%	0.00	1,728,291	0.23%	0.00
SANTA CRUZ	16,162	0.75%	0.00	7,862,890	1.03%	0.18
SHASTA	155,660	7.26%	2.94	49,412,637	6.47%	2.54
SIERRA	34,766	1.62%	19.71	10,712,573	1.40%	21.02
SISKIYOU	198,817	9.27%	21.76	57,845,413	7.57%	19.25
SOLANO	-	0.00%	0.00	12,161	0.00%	0.00
SONOMA	30,918	1.44%	0.00	14,231,374	1.86%	0.00
STANISLAUS	-	0.00%	0.00	468	0.00%	0.00
SUTTER	-	0.00%	0.00	-	0.00%	0.00
TEHAMA	98,816	4.61%	0.66	33,003,810	4.32%	0.79
TRINITY	97,508	4.55%	7.97	30,283,140	3.96%	6.24
TULARE	7,894	0.37%	85.56	2,108,570	0.28%	86.75
TUOLUMNE	47,501	2.22%	17.55	12,518,801	1.64%	10.65
VENTURA	-	0.00%	0.00	66,115	0.01%	0.00
YOLO	-	0.00%	0.00	-	0.00%	0.00
YUBA	35,702	1.67%	4.45	11,938,012	1.56%	3.39
<b>ALL COUNTIES</b>	<b>2,144,151</b>	<b>100%</b>	<b>11.24</b>	<b>\$763,787,325</b>	<b>100%</b>	<b>7.34</b>

CALIFORNIA TIMBER HARVEST BY COUNTY  
1 QTR 2000 TO 4 QTR 2000

YT-36 Report

04/05/2001

COUNTY	Timber Harvest Volume			Harvest Value		
	(NET MBF)	% of State	% Gvt	Dollars	% of State	% Gvt
ALAMEDA	0	0.00%	0.00	\$19,472	0.00	0.00
ALPINE	0	0.00%	0.00	\$0	0.00	0.00
AMADOR	26423	1.45%	22.53	\$9,982,039	1.10	21.75
BUTTE	85791	4.36%	4.13	\$33,483,906	3.68	1.91
CALAVERAS	49079	2.50%	7.72	\$15,174,086	1.67	6.43
COLUSA	0	0.00%	0.00	\$0	0.00	0.00
CONTRA COSTA	0	0.00%	0.00	\$13,917	0.00	0.00
DEL NORTE	46133	2.35%	3.48	\$38,584,028	4.24	0.96
EL DORADO	107498	5.47%	54.94	\$28,207,613	3.10	43.96
FRESNO	16301	0.83%	55.25	\$4,916,738	0.54	44.42
GLENN	16522	0.84%	37.02	\$5,633,640	0.62	48.02
HUMBOLDT	388886	19.78%	0.18	\$285,230,574	31.42	0.27
IMPERIAL	0	0.00%	0.00	\$0	0.00	0.00
INYO	0	0.00%	0.00	\$0	0.00	0.00
KERN	5253	0.27%	1.37	\$1,386,905	0.15	0.50
KINGS	0	0.00%	0.00	\$0	0.00	0.00
LAKE	6146	0.31%	3.56	\$2,215,702	0.24	3.25
LASSEN	80566	3.08%	13.61	\$20,653,676	2.27	8.57
LOS ANGELES	0	0.00%	0.00	\$18,119	0.00	0.00
MADERA	3196	0.16%	99.22	\$772,931	0.09	98.04
MARIN	0	0.00%	0.00	\$0	0.00	0.00
MARIPOSA	2746	0.14%	0.00	\$863,375	0.09	0.00
MENDOCINO	156101	7.94%	5.78	\$114,836,073	12.61	3.59
MERCED	0	0.00%	0.00	\$7,089	0.00	0.00
MODOC	41628	2.12%	7.18	\$12,031,131	1.32	10.27
MONO	0	0.00%	0.00	\$17,115	0.00	100.00
MONTEREY	0	0.00%	0.00	\$9,390	0.00	0.00
NAPA	649	0.03%	0.00	\$273,099	0.03	0.00
NEVADA	47250	2.40%	33.66	\$15,168,618	1.67	24.96
ORANGE	0	0.00%	0.00	\$47,366	0.01	0.00
PLACER	32462	1.65%	18.20	\$9,658,759	1.06	14.05
PLUMAS	154225	7.85%	12.17	\$49,224,004	5.41	7.14
RIVERSIDE	0	0.00%	0.00	\$28,025	0.00	0.00
SACRAMENTO	0	0.00%	0.00	\$17,488	0.00	0.00
SAN BENITO	0	0.00%	0.00	\$0	0.00	0.00
SAN BERNARDINO	0	0.00%	0.00	\$13,050	0.00	0.00
SAN DIEGO	0	0.00%	0.00	\$10,763	0.00	0.00
SAN FRANCISCO	0	0.00%	0.00	\$0	0.00	0.00
SAN JOAQUIN	0	0.00%	0.00	\$14,950	0.00	0.00
SAN LUIS OBISPO	0	0.00%	0.00	\$11,310	0.00	0.00
SAN MATEO	4505	0.23%	0.00	\$4,533,439	0.50	0.00
SANTA BARBARA	0	0.00%	0.00	\$2,880	0.00	0.00
SANTA CLARA	3954	0.20%	0.00	\$3,867,213	0.43	0.00
SANTA CRUZ	18414	0.94%	0.00	\$14,035,783	1.54	0.00
SHASTA	144640	7.36%	5.75	\$49,005,685	5.39	5.36
SIERRA	40848	2.08%	40.45	\$12,359,580	1.36	31.17
SISKIYOU	193408	9.84%	18.45	\$63,797,993	7.02	17.04
SOLANO	0	0.00%	0.00	\$12,982	0.00	0.00
SONOMA	24157	1.23%	0.00	\$19,493,979	2.14	0.00
STANISLAUS	0	0.00%	0.00	\$144	0.00	0.00
SUTTER	0	0.00%	0.00	\$0	0.00	0.00
TEHAMA	100887	5.13%	3.66	\$35,558,676	3.91	4.46
TRINITY	72735	3.70%	4.54	\$24,812,648	2.73	4.64
TULARE	5445	0.28%	71.66	\$1,529,738	0.17	71.29
TUOLUMNE	61061	3.11%	35.72	\$17,726,595	1.95	26.57
VENTURA	0	0.00%	0.00	\$73,549	0.01	0.00
YOLO	0	0.00%	0.00	\$0	0.00	0.00
YUBA	46767	2.38%	36.44	\$13,930,700	1.53	28.98
ALL COUNTIES	1965657	100.00%	13.47	\$909,066,535	100.00	7.56

## REPORT YT-36

CALIFORNIA TIMBER HARVEST BY COUNTY  
1 QTR 2001 TO 4 QTR 2001

COUNTY	VOLUME	% VOL	% PUBLIC	VALUE	% VALUE	% PUBLIC
ALAMEDA	0	0.00	0.00	\$12,986	0.00	0.00
ALPINE	0	0.00	0.00	\$0	0.00	0.00
AMADOR	17,079	1.07	8.33	\$5,428,799	0.94	4.54
BUTTE	92,562	5.77	0.03	\$32,878,252	5.71	0.01
CALAVERAS	34,964	2.18	19.08	\$8,133,192	1.41	15.87
COLUSA	0	0.00	0.00	\$0	0.00	0.00
CONTRA COSTA	0	0.00	0.00	\$7,128	0.00	0.00
DEL NORTE	22,691	1.42	0.33	\$15,156,108	2.63	0.08
EL DORADO	96,830	6.04	37.44	\$23,665,220	4.11	28.01
FRESNO	12,215	0.76	40.56	\$3,496,298	0.61	28.38
GLENN	962	0.06	18.40	\$208,860	0.04	20.28
HUMBOLDT	358,225	22.34	0.00	\$190,568,685	33.14	0.00
IMPERIAL	0	0.00	0.00	\$0	0.00	0.00
INYO	0	0.00	0.00	\$0	0.00	0.00
KERN	0	0.00	0.00	\$15,544	0.00	0.00
KINGS	0	0.00	0.00	\$0	0.00	0.00
LAKE	2,932	0.18	0.00	\$771,454	0.13	0.00
LASSEN	54,683	3.41	7.41	\$14,792,790	2.57	4.95
LOS ANGELES	0	0.00	0.00	\$10,843	0.00	0.00
MADERA	6,672	0.42	67.61	\$1,352,615	0.23	51.05
MARIN	0	0.00	0.00	\$0	0.00	0.00
MARIPOSA	4,133	0.26	0.77	\$1,306,815	0.23	0.18
MENDOCINO	117,596	7.33	2.67	\$52,437,479	9.11	2.45
MERCED	0	0.00	0.00	\$5,146	0.00	0.00
MODOC	27,166	1.69	13.41	\$6,904,355	1.20	11.04
MONO	0	0.00	0.00	\$13,665	0.00	100.00
MONTEREY	0	0.00	0.00	\$6,548	0.00	0.00
NAPA	490	0.03	34.29	\$141,519	0.02	37.25
NEVADA	39,884	2.49	18.97	\$11,776,364	2.05	14.13
ORANGE	0	0.00	0.00	\$25,872	0.00	0.00
PLACER	56,891	3.55	11.90	\$13,430,303	2.33	10.01
PLUMAS	99,241	6.19	4.71	\$29,136,282	5.06	2.79
RIVERSIDE	0	0.00	0.00	\$21,066	0.00	0.00
SACRAMENTO	0	0.00	0.00	\$19,368	0.00	0.00
SAN BENITO	0	0.00	0.00	\$0	0.00	0.00
SAN BERNARDINO	1,397	0.09	74.95	\$161,433	0.03	51.89
SAN DIEGO	0	0.00	0.00	\$9,460	0.00	0.00
SAN FRANCISCO	0	0.00	0.00	\$0	0.00	0.00
SAN JOAQUIN	0	0.00	0.00	\$12,348	0.00	0.00
SAN LUIS OBISPO	0	0.00	0.00	\$7,932	0.00	0.00
SAN MATEO	4,151	0.26	0.00	\$2,741,589	0.48	0.00
SANTA BARBARA	0	0.00	0.00	\$1,440	0.00	0.00
SANTA CLARA	3,432	0.21	0.00	\$2,892,323	0.50	0.00
SANTA CRUZ	7,230	0.45	0.00	\$4,701,393	0.82	0.00
SHASTA	144,513	9.01	3.07	\$40,399,186	7.02	1.99
SIERRA	24,533	1.53	24.69	\$5,729,742	1.00	23.50
SISKIYOU	134,829	8.41	8.33	\$36,224,679	6.29	6.36
SOLANO	0	0.00	0.00	\$15,508	0.00	0.00
SONOMA	9,559	0.60	0.00	\$5,218,255	0.91	0.00
STANISLAUS	0	0.00	0.00	\$0	0.00	0.00
SUTTER	0	0.00	0.00	\$0	0.00	0.00
TEHAMA	63,783	3.98	0.04	\$19,778,495	3.44	0.03
TRINITY	83,590	5.21	1.99	\$24,022,909	4.17	2.16
TULARE	4,844	0.30	53.55	\$533,171	0.09	36.43
TUOLUMNE	52,452	3.27	20.60	\$13,235,142	2.30	16.97
VENTURA	0	0.00	0.00	\$78,096	0.01	0.00
YOLO	0	0.00	0.00	\$0	0.00	0.00
YUBA	23,849	1.49	24.95	\$8,202,912	1.42	16.09
ALL COUNTIES	1,603,378	100.00	7.97	\$575,687,569	100.00	4.41

REPORT YT-36 CALIFORNIA TIMBER HARVEST BY COUNTY MARCH 19, 2003  
 YEAR 2002 QUARTER 1 TO 4

COUNTY	VOLUME (NET MBF)	VOLUME PERCENT	PERCENT PUBLIC	VALUE	VALUE PERCENT	PERCENT PUBLIC
ALAMEDA	0	0.00	0.00	\$11,319	0.00	0.00
ALPINE	363	0.02	0.00	\$65,500	0.01	0.00
AMADOR	28,310	1.67	19.21	\$6,668,845	1.48	9.32
BUTTE	63,421	3.75	0.00	\$18,056,154	3.99	0.00
CALAVERAS	48,493	2.87	18.09	\$13,079,754	2.89	13.66
COLUSA	0	0.00	0.00	0	0.00	0.00
CONTRA COSTA	0	0.00	0.00	0	0.00	0.00
DEL NORTE	23,906	1.41	0.00	\$9,645,174	2.13	0.00
EL DORADO	104,435	6.18	42.02	\$19,444,886	4.30	28.79
FRESNO	12,745	0.75	22.24	\$3,196,954	0.71	12.94
GLENN	3,050	0.18	28.08	\$771,620	0.17	25.02
HUMBOLDT	374,041	22.14	0.00	\$130,554,325	28.90	0.00
IMPERIAL	0	0.00	0.00	0	0.00	0.00
INYO	0	0.00	0.00	0	0.00	0.00
KERN	521	0.03	0.00	\$189,878	0.04	0.00
KINGS	0	0.00	0.00	0	0.00	0.00
LAKE	61	0.00	0.00	\$11,880	0.00	0.00
LASEN	85,106	5.04	12.89	\$18,269,984	4.04	7.27
LOS ANGELES	0	0.00	0.00	\$10,000	0.00	0.00
MADERA	5,805	0.35	84.34	\$1,124,825	0.25	78.55
MARIN	0	0.00	0.00	0	0.00	0.00
MARTIPOSA	3,187	0.19	0.00	\$843,980	0.19	0.00
MENDOCINO	97,722	5.78	0.19	\$29,479,471	6.52	0.06
MERCED	0	0.00	0.00	\$6,060	0.00	0.00
MODOC	29,109	1.72	0.26	\$4,330,330	0.96	0.24
MONO	153	0.01	0.00	\$58,820	0.01	41.99
MONTEREY	0	0.00	0.00	\$4,321	0.00	0.00
NAPA	441	0.02	43.31	\$131,897	0.03	48.11
NEVADA	50,000	2.96	18.82	\$11,538,188	2.55	11.46
ORANGE	0	0.00	0.00	0	0.00	0.00
PLACER	49,927	2.95	24.03	\$9,722,916	2.15	26.02
PLUMAS	79,802	4.72	24.39	\$17,507,215	3.87	16.58
RIVERSIDE	218	0.01	0.00	\$43,422	0.01	0.00
SACRAMENTO	0	0.00	0.00	\$24,552	0.01	0.00
SAN BENITO	0	0.00	0.00	0	0.00	0.00
SAN BERNARDINO	0	0.00	0.00	\$10,963	0.00	0.00
SAN DIEGO	194	0.01	0.00	\$21,985	0.00	0.00
SAN FRANCISCO	0	0.00	0.00	0	0.00	0.00
SAN JOAQUIN	0	0.00	0.00	\$10,495	0.00	0.00
SAN LOUIS OBISPO	0	0.00	0.00	\$6,940	0.00	0.00
SAN MATEO	2,878	0.17	0.00	\$1,176,131	0.26	0.00
SANTA BARBARA	0	0.00	0.00	\$1,224	0.00	0.00
SANTA CLARA	599	0.04	0.00	\$300,336	0.07	0.00
SANTA CRUZ	9,136	0.54	0.00	\$4,073,573	0.90	0.00
SHASTA	152,104	9.00	0.62	\$39,261,247	8.69	0.27
SIERRA	33,342	1.97	22.41	\$6,591,583	1.46	14.64
SISKIYOU	187,215	11.08	11.03	\$40,458,236	8.95	8.37
SOLANO	0	0.00	0.00	\$2,252	0.00	0.00
SONOMA	9,671	0.57	0.00	\$3,482,865	0.77	0.00
STANISLAUS	0	0.00	0.00	0	0.00	0.00
SUTTER	0	0.00	0.00	0	0.00	0.00
TEHAMA	65,220	3.86	0.06	\$17,335,563	3.83	0.03
TRINITY	81,086	4.80	0.88	\$23,312,547	5.16	0.69
TULARE	7,255	0.43	63.93	\$1,170,345	0.26	61.52
TUOLUMNE	63,190	3.74	25.45	\$14,362,772	3.18	16.15
VENTURA	0	0.00	0.00	\$68,617	0.02	0.00
YOLO	0	0.00	0.00	0	0.00	0.00
YUBA	17,363	1.03	0.00	\$5,604,046	1.24	0.00
ALL COUNTIES	1,690,199	100.00	10.02	\$452,044,070	100.00	5.60

REPORT YT-36

CALIFORNIA TIMBER HARVEST BY COUNTY  
YEAR 2003 QUARTERS 1 TO 4

4/5/2004

COUNTY	VOLUME (NET MBF)	VOLUME PERCENT	PERCENT PUBLIC	VALUE	VALUE PERCENT	PERCENT PUBLIC
ALAMEDA	0	0.00	0.00	\$7,924	0.00	0.00
ALPINE	0	0.00	0.00	\$8,268	0.00	0.00
AMADOR	21,224	1.28	16.98	\$5,705,195	1.27	7.48
BUTTE	47,087	2.83	0.51	\$13,263,596	2.96	0.26
CALAVERAS	50,722	3.05	2.78	\$12,650,247	2.83	1.02
COLUSA	1,892	0.11	100.00	\$176,980	0.04	100.00
CONTRA COSTA		0.00			0.00	
DEL NORTE	23,829	1.43	0.00	\$9,113,488	2.04	0.00
EL DORADO	87,620	5.27	22.65	\$17,441,809	3.90	13.79
FRESNO	10,458	0.63	25.49	\$2,673,946	0.60	14.35
GLENN	47	0.00	0.00	\$9,870	0.00	0.00
HUMBOLDT	383,675	23.07	0.00	\$142,830,437	31.90	0.00
IMPERIAL		0.00			0.00	
INYO		0.00			0.00	
KERN		0.00			0.00	
KINGS		0.00			0.00	
LAKE	625	0.04	25.92	\$132,442	0.03	13.45
LASSEN	63,089	3.79	19.18	\$11,049,349	2.47	10.53
LOS ANGELES	0	0.00	0.00	\$9,468	0.00	0.00
MADERA	3,189	0.19	91.13	\$537,798	0.12	85.00
MARIN		0.00			0.00	
MARIPOSA	2,433	0.15	0.00	\$627,375	0.14	0.00
MENDOCINO	112,568	6.77	0.06	\$40,354,141	9.01	0.03
MERCED	0	0.00	0.00	\$6,652	0.00	0.00
MODOC	19,386	1.17	25.07	\$3,984,016	0.89	20.66
MONO	34	0.00	0.00	\$73,540	0.02	80.36
MONTEREY	0	0.00	0.00	\$3,592	0.00	0.00
NAPA	373	0.02	7.77	\$108,070	0.02	6.66
NEVADA	38,585	2.32	19.04	\$8,986,639	2.01	9.52
ORANGE	0	0.00	0.00	\$19,860	0.00	0.00
PLACER	35,075	2.11	25.84	\$6,763,721	1.51	20.18
PLUMAS	97,866	5.88	2.94	\$22,799,710	5.09	1.61
RIVERSIDE	758	0.05	0.00	\$75,866	0.02	0.00
SACRAMENTO	0	0.00	0.00	\$28,714	0.01	0.00
SAN BENITO		0.00			0.00	
SAN BERNARDINO	1,901	0.11	20.52	\$251,063	0.06	27.05
SAN DIEGO	4,860	0.29	0.00	\$167,303	0.04	0.00
SAN FRANCISCO		0.00			0.00	
SAN JOAQUIN	0	0.00	0.00	\$6,840	0.00	0.00
SAN LUIS OBISPO	0	0.00	0.00	\$7,735	0.00	0.00
SAN MATEO	5,441	0.33	0.00	\$2,582,369	0.58	0.00
SANTA BARBARA	0	0.00	0.00	\$972	0.00	0.00
SANTA CLARA	112	0.01	0.00	\$70,486	0.02	0.00
SANTA CRUZ	9,614	0.58	0.00	\$4,263,385	0.95	0.00
SHASTA	122,351	7.36	6.33	\$27,731,361	6.19	4.13
SIERRA	35,193	2.12	28.08	\$5,265,290	1.18	19.38
SISKIYOU	230,871	13.88	16.79	\$45,481,123	10.16	11.83
SOLANO	0	0.00	0.00	\$12,895	0.00	0.00
SONOMA	15,698	0.94	0.00	\$7,291,430	1.63	0.00
STANISLAUS		0.00			0.00	
SUTTER		0.00			0.00	
TEHAMA	74,207	4.46	0.00	\$17,137,043	3.83	0.00
TRINITY	90,921	5.47	0.00	\$20,587,257	4.60	0.00
TULARE	9,802	0.59	64.98	\$1,861,999	0.42	62.30
TUOLUMNE	38,001	2.29	58.77	\$7,413,613	1.66	52.38
VENTURA	0	0.00	0.00	\$61,431	0.01	0.00
YOLO		0.00			0.00	
YOBA	23,507	1.41	0.00	\$8,097,448	1.81	0.00
All counties	1,663,014	100.00	9.29	\$447,733,756	100.00	4.83

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REPORT YT-36 CALIFORNIA TIMBER HARVEST BY COUNTY  
YEAR 2004 QUARTERS 1 TO 4

COUNTY	VOLUME			VALUE		
	(NET MBF)	% BY COUNTY	% PUBLIC		% BY COUNTY	% PUBLIC
ALAMEDA	0	0.00	0.00	\$10,478	0.00	0.00
ALPINE	0	0.00	0.00	0	0.00	0.00
AMADOR	6,962	0.41	29.45	\$1,781,980	0.36	18.27
BUTTE	52,479	3.08	1.08	\$15,031,638	3.01	1.20
CALAVERAS	50,203	2.94	4.87	\$12,966,336	2.59	4.89
COLUSA	0	0.00	0.00	0	0.00	0.00
CONTRA COSTA	127	0.01	0.00	\$38,100	0.01	0.00
DEL NORTE	28,544	1.67	0.00	\$13,118,055	2.62	0.00
EL DORADO	100,798	5.91	11.95	\$23,332,623	4.67	7.66
FRESNO	8,212	0.48	28.37	\$1,417,538	0.28	17.71
GLENN	814	0.05	0.00	\$130,800	0.03	0.00
HUMBOLDT	398,500	23.24	0.25	\$169,122,026	33.84	0.33
IMPERIAL	0	0.00	0.00	0	0.00	0.00
INYO	0	0.00	0.00	0	0.00	0.00
KERN	0	0.00	0.00	0	0.00	0.00
KINGS	0	0.00	0.00	0	0.00	0.00
LAKE	486	0.03	0.00	\$62,530	0.01	0.00
LASSEN	91,660	5.37	7.64	\$15,815,605	3.16	5.31
LOS ANGELES	0	0.00	0.00	\$11,835	0.00	0.00
MADERA	2,500	0.15	40.20	\$484,702	0.10	23.80
MARIN	0	0.00	0.00	0	0.00	0.00
MARIPOSA	2,787	0.16	0.00	\$712,114	0.14	0.00
MENDOCINO	109,548	6.42	0.00	\$40,995,090	8.20	0.00
MERCED	0	0.00	0.00	\$7,230	0.00	0.00
MODOC	34,128	2.00	1.70	\$6,106,556	1.22	1.48
MONO	0	0.00	0.00	\$44,400	0.01	100.00
MONTEREY	0	0.00	0.00	\$4,168	0.00	0.00
NAPA	97	0.01	27.84	\$27,075	0.01	28.53
NEVADA	33,363	1.96	14.70	\$8,775,069	1.75	10.42
ORANGE	0	0.00	0.00	\$29,078	0.01	0.00
PLACER	39,334	2.31	24.65	\$10,213,048	2.04	13.11
PLUMAS	123,878	7.25	10.20	\$31,273,174	6.25	5.55
RIVERSIDE	0	0.00	0.00	0	0.00	0.00
SACRAMENTO	0	0.00	0.00	\$51,867	0.01	0.00
SAN BENITO	0	0.00	0.00	0	0.00	0.00
SAN BERNARDINO	1,391	0.08	0.00	\$9,410	0.00	0.00
SAN DIEGO	0	0.00	0.00	\$10,868	0.00	0.00
SAN FRANCISCO	0	0.00	0.00	0	0.00	0.00
SAN JOAQUIN	0	0.00	0.00	\$8,271	0.00	0.00
SAN LUIS OBISPO	0	0.00	0.00	\$11,803	0.00	0.00
SAN MATEO	3,799	0.22	0.00	\$1,802,958	0.36	0.00
SANTA BARBARA	0	0.00	0.00	0	0.00	0.00
SANTA CLARA	67	0.00	0.00	\$71,226	0.01	0.00
SANTA CRUZ	11,089	0.65	0.00	\$5,811,351	1.16	0.00
SHASTA	135,723	7.96	4.53	\$29,827,785	5.96	2.72
SIERRA	27,225	1.60	30.55	\$5,308,752	1.06	21.22
SISKIYOU	239,349	14.03	10.17	\$51,565,369	10.31	6.45
SOLANO	0	0.00	0.00	\$18,351	0.00	0.00
SONOMA	14,136	0.83	0.00	\$5,749,075	1.15	0.00
STANISLAUS	0	0.00	0.00	0	0.00	0.00
SUTTER	0	0.00	0.00	0	0.00	0.00
TEHAMA	28,612	1.68	0.00	\$7,782,617	1.56	0.00
TRINITY	94,885	5.56	0.52	\$23,268,890	4.65	0.29
TULARE	16,339	0.96	77.99	\$2,169,305	0.43	74.96
TUOLUMNE	23,570	1.38	20.35	\$5,038,494	1.01	15.74
VENTURA	0	0.00	0.00	\$70,845	0.01	0.00
YOLO	0	0.00	0.00	0	0.00	0.00
YUBA	27,495	1.61	0.00	\$10,037,487	2.01	0.00
ALL COUNTIES	1,705,900	Page 45 of 56	SDRCS GRU	DEIS Comments 2	100.00	3.31

Report YT-36  
TIMBER TAX SECTION

**CALIFORNIA TIMBER HARVEST BY COUNTY  
YEAR 2005 QUARTER 1 TO 4**

April 3, 2006

COUNTY	VOLUME (NET MBF)	VOLUME %	% PUBLIC VOLUME	VALUE	VALUE %	% PUBLIC VALUE
ALAMEDA	0	0.00	0.00	\$2,362	0.00	0.00
ALPINE	20	0.00	0.00	\$20	0.00	0.00
AMADOR	87,852	5.09	56.13	\$14,771,428	2.70	42.13
BUTTE	29,936	1.74	21.85	\$7,661,754	1.40	13.66
CALAVERAS	15,677	0.91	21.27	\$3,864,452	0.71	14.36
COLUSA	0	0.00	0.00	\$0	0.00	0.00
CONTRA COSTA	0	0.00	0.00	\$0	0.00	0.00
DEL NORTE	22,557	1.31	0.00	\$11,185,640	2.05	0.00
EL DORADO	90,019	5.22	39.83	\$16,797,841	3.07	26.08
FRESNO	11,525	0.67	20.80	\$2,344,847	0.43	9.93
GLENN	3,112	0.18	0.80	\$475,830	0.09	0.94
HUMBOLDT	390,333	22.63	1.75	\$193,362,618	35.35	1.10
IMPERIAL	0	0.00	0.00	\$0	0.00	0.00
INYO	0	0.00	0.00	\$0	0.00	0.00
KERN	1,592	0.09	87.50	\$163,260	0.03	78.42
KINGS	0	0.00	0.00	\$0	0.00	0.00
LAKE	100	0.01	100.00	\$29,520	0.01	100.00
LASSEN	67,910	3.94	21.81	\$15,298,825	2.80	15.86
LOS ANGELES	455	0.03	0.00	\$81,908	0.01	0.00
MADERA	3,038	0.18	98.45	\$486,120	0.09	98.07
MARIN	0	0.00	0.00	\$0	0.00	0.00
MARIPOSA	5,796	0.34	16.53	\$1,249,837	0.23	12.26
MENDOCINO	120,841	7.01	0.00	\$63,913,803	9.86	0.00
MERCED	0	0.00	0.00	\$6,562	0.00	0.00
MODOC	43,087	2.50	3.66	\$8,480,072	1.55	5.58
MONO	0	0.00	0.00	\$27,810	0.01	68.50
MONTEREY	0	0.00	0.00	\$4,326	0.00	0.00
NAPA	1,130	0.07	4.69	\$414,539	0.08	4.08
NEVADA	36,391	2.11	2.28	\$8,807,781	1.61	2.22
ORANGE	0	0.00	0.00	\$29,694	0.01	0.00
PLACER	46,025	2.67	25.07	\$11,513,848	2.11	15.48
PLUMAS	107,817	6.25	15.41	\$26,386,696	4.82	10.17
RIVERSIDE	0	0.00	0.00	\$8,904	0.00	0.00
SACRAMENTO	0	0.00	0.00	\$45,684	0.01	0.00
SAN BENITO	0	0.00	0.00	\$0	0.00	0.00
SAN BERNARDINO	604	0.04	0.00	\$604	0.00	0.00
SAN DIEGO	0	0.00	0.00	\$7,944	0.00	0.00
SAN FRANCISCO	0	0.00	0.00	\$0	0.00	0.00
SAN JOAQUIN	0	0.00	0.00	\$9,297	0.00	0.00
SAN LUIS OBISPO	0	0.00	0.00	\$13,798	0.00	0.00
SAN MATEO	5,721	0.33	0.63	\$3,659,186	0.67	0.13
SANTA BARBARA	0	0.00	0.00	\$0	0.00	0.00
SANTA CLARA	2,705	0.16	0.00	\$1,752,842	0.32	0.00
SANTA CRUZ	9,674	0.56	0.00	\$6,158,287	1.13	0.00
SHASTA	170,690	9.89	5.34	\$43,469,158	7.95	4.64
SIERRA	27,120	1.57	18.52	\$6,378,607	1.17	12.44
SISKIYOU	207,726	12.04	19.31	\$47,587,015	8.70	15.86
SOLANO	0	0.00	0.00	\$18,000	0.00	0.00
SONOMA	8,953	0.52	0.00	\$4,984,256	0.91	0.00
STANISLAUS	0	0.00	0.00	\$0	0.00	0.00
SUTTER	0	0.00	0.00	\$0	0.00	0.00
TEHAMA	65,095	3.77	4.67	\$18,071,990	3.30	2.96
TRINITY	81,607	4.73	0.72	\$21,730,126	3.97	0.69
TULARE	10,703	0.62	79.54	\$1,879,674	0.34	78.58
TUOLUMNE	37,379	2.17	19.31	\$9,543,985	1.74	13.32
VENTURA	0	0.00	0.00	\$61,514	0.01	0.00
YOLO	0	0.00	0.00	\$0	0.00	0.00
YUBA	11,834	0.69	6.40	\$4,214,745	0.77	6.07
ALL COUNTIES	1,725,024	100	13.30	\$546,937,010	100	6.76

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REPORT YT-36  
TIMBER TAX SECTION

CALIFORNIA TIMBER HARVEST BY COUNTY  
YEAR 2006 QUARTER 1 TO 4

4/11/2007

COUNTY	VOLUME (NET MBF)	VOLUME PERCENT	PERCENT PUBLIC	VALUE	VALUE PERCENT	PERCENT PUBLIC
ALAMEDA	0	0.00	0.00	\$ 9,627	0.00	0.00
ALPINE	51	0.00	0.00	\$ 2,780	0.00	0.00
AMADOR	27,274	1.67	76.59	\$ 2,800,259	0.52	51.89
BUTTE	62,797	3.85	9.26	\$ 19,652,996	3.68	4.91
CALAVERAS	33,523	2.06	3.36	\$ 8,834,814	1.65	1.78
COLUSA	0	0.00	0.00	\$ -	0.00	0.00
CONTRA COSTA	0	0.00	0.00	\$ 9,975	0.00	0.00
DEL NORTE	16,809	1.03	11.31	\$ 7,447,657	1.39	4.16
EL DORADO	99,508	6.10	24.94	\$ 22,846,630	4.28	11.95
FRESNO	10,345	0.63	51.51	\$ 2,046,265	0.38	41.28
GLENN	0	0.00	0.00	\$ -	0.00	0.00
HUMBOLDT	336,743	20.64	1.70	\$ 171,627,827	32.16	0.50
IMPERIAL	0	0.00	0.00	\$ -	0.00	0.00
INYO	0	0.00	0.00	\$ -	0.00	0.00
KERN	1,016	0.06	93.80	\$ 59,471	0.01	92.43
KINGS	0	0.00	0.00	\$ -	0.00	0.00
LAKE	928	0.06	3.99	\$ 339,069	0.06	1.17
LASSEN	60,307	3.70	24.10	\$ 13,336,082	2.50	16.36
LOS ANGELES	0	0.00	0.00	\$ -	0.00	0.00
MADERA	2,361	0.14	76.41	\$ 402,060	0.08	69.43
MARIN	0	0.00	0.00	\$ -	0.00	0.00
MARIPOSA	4,798	0.29	36.43	\$ 1,152,325	0.22	22.75
MENDOCINO	110,168	6.75	0.00	\$ 53,378,734	9.99	0.00
MERCED	0	0.00	0.00	\$ 6,300	0.00	0.00
MODOC	24,991	1.53	1.24	\$ 5,393,523	1.01	1.12
MONO	0	0.00	0.00	\$ 24,600	0.00	60.37
MONTEREY	0	0.00	0.00	\$ -	0.00	0.00
NAPA	82	0.01	58.54	\$ 26,717	0.01	53.00
NEVADA	27,824	1.71	15.05	\$ 7,321,637	1.37	12.31
ORANGE	0	0.00	0.00	\$ 25,882	0.00	0.00
PLACER	49,281	3.02	27.36	\$ 11,583,044	2.17	20.34
PLUMAS	118,936	7.29	21.78	\$ 28,812,494	5.39	13.97
RIVERSIDE	0	0.00	0.00	\$ 6,750	0.00	0.00
SACRAMENTO	0	0.00	0.00	\$ 34,281	0.01	0.00
SAN BENITO	0	0.00	0.00	\$ -	0.00	0.00
SAN BERNARDINO	0	0.00	0.00	\$ -	0.00	0.00
SAN DIEGO	0	0.00	0.00	\$ 9,108	0.00	0.00
SAN FRANCISCO	0	0.00	0.00	\$ -	0.00	0.00
SAN JOAQUIN	0	0.00	0.00	\$ 7,623	0.00	0.00
SAN LUIS OBISPO	0	0.00	0.00	\$ 10,710	0.00	0.00
SAN MATEO	5,731	0.35	0.00	\$ 4,044,658	0.76	0.00
SANTA BARBARA	0	0.00	0.00	\$ -	0.00	0.00
SANTA CLARA	1,983	0.12	0.00	\$ 1,229,981	0.23	0.00
SANTA CRUZ	9,600	0.59	0.00	\$ 6,339,356	1.19	0.00
SHASTA	189,501	11.62	2.01	\$ 50,460,525	9.45	1.13
SIERRA	22,041	1.35	12.19	\$ 5,241,549	0.98	10.90
SISKIYOU	198,832	12.19	20.99	\$ 47,924,733	8.97	20.28
SOLANO	0	0.00	0.00	\$ -	0.00	0.00
SONOMA	11,196	0.69	0.00	\$ 6,323,938	1.18	0.00
STANISLAUS	0	0.00	0.00	\$ -	0.00	0.00
SUTTER	0	0.00	0.00	\$ -	0.00	0.00
TEHAMA	51,179	3.14	0.00	\$ 14,847,860	2.78	0.00
TRINITY	84,998	5.21	11.10	\$ 22,926,002	4.29	9.78
TULARE	5,849	0.36	87.72	\$ 1,219,013	0.23	92.23
TUOLUMNE	48,392	2.97	15.02	\$ 11,484,126	2.15	10.52
VENTURA	0	0.00	0.00	\$ 16,258	0.00	0.00
YOLO	0	0.00	0.00	\$ -	0.00	0.00
YUBA	14,156	0.87	12.73	\$ 4,837,142	0.91	12.00
ALL COUNTIES	1,631,207	100.00	12.29	\$ 1,043,381	100.00	6.26



REPORT YT-36 CALIFORNIA TIMBER HARVEST BY COUNTY 4/21/2008  
 TIMBER TAX SECTION 2007 QUARTERS 1 TO 4

COUNTY	VOLUME (NET MBF)	VOLUME PERCENT	PERCENT PUBLIC	VALUE	VALUE PERCENT	PERCENT PUBLIC
ALAMEDA	0	0.00	0.00	\$10,725	0.00	0.00
ALPINE	0	0.00	0.00	\$0	0.00	0.00
AMADOR	18,297	1.13	19.18	\$4,642,074	0.98	18.42
BUTTE	65,964	4.06	2.25	\$16,550,040	3.49	1.37
CALAVERAS	27,136	1.67	0.00	\$4,907,155	1.03	0.00
COLUSA	0	0.00	0.00	\$0	0.00	0.00
CONTRA COSTA	0	0.00	0.00	\$7,020	0.00	0.00
DEL NORTE	11,948	0.73	0.00	\$5,671,161	1.20	0.00
EL DORADO	91,055	5.60	21.58	\$18,521,478	3.90	14.53
FRESNO	13,142	0.81	39.32	\$2,735,138	0.58	28.44
GLENN	2,086	0.13	0.00	\$379,900	0.08	0.00
HUMBOLDT	296,840	18.25	0.08	\$147,113,659	31.03	0.12
IMPERIAL	0	0.00	0.00	\$0	0.00	0.00
INYO	0	0.00	0.00	\$0	0.00	0.00
KERN	2,584	0.16	0.00	\$482,245	0.10	0.00
KINGS	0	0.00	0.00	\$0	0.00	0.00
LAKE	3,684	0.23	3.53	\$802,721	0.17	2.11
LASSEN	29,139	1.79	9.44	\$5,468,490	1.15	6.66
LOS ANGELES	0	0.00	0.00	\$0	0.00	0.00
MADERA	7,074	0.44	94.87	\$987,350	0.21	90.53
MARIN	0	0.00	0.00	\$0	0.00	0.00
MARIPOSA	5,284	0.32	67.74	\$921,922	0.19	52.30
MENDOCINO	103,031	6.34	1.14	\$43,647,855	9.20	0.35
MERCED	0	0.00	0.00	\$6,750	0.00	0.00
MODOC	35,110	2.16	9.93	\$5,329,280	1.12	11.87
MONO	9	0.00	100.00	\$38,310	0.01	100.00
MONTEREY	0	0.00	0.00	\$3,435	0.00	0.00
NAPA	126	0.01	0.00	\$16,650	0.00	0.00
NEVADA	30,473	1.87	7.61	\$8,743,706	1.42	8.48
ORANGE	0	0.00	0.00	\$24,587	0.01	0.00
PLACER	35,247	2.17	32.42	\$7,347,588	1.55	22.48
PLUMAS	136,521	8.40	10.92	\$28,070,293	5.92	9.08
RIVERSIDE	0	0.00	0.00	\$0	0.00	0.00
SACRAMENTO	0	0.00	0.00	\$26,802	0.01	0.00
SAN BENITO	0	0.00	0.00	\$0	0.00	0.00
SAN BERNARDINO	0	0.00	0.00	\$0	0.00	0.00
SAN DIEGO	0	0.00	0.00	\$9,405	0.00	0.00
SAN FRANCISCO	0	0.00	0.00	\$0	0.00	0.00
SAN JOAQUIN	0	0.00	0.00	\$6,345	0.00	0.00
SAN LUIS OBISPO	0	0.00	0.00	\$12,190	0.00	0.00
SAN MATEO	5,806	0.36	0.00	\$4,117,785	0.87	0.00
SANTA BARBARA	0	0.00	0.00	\$0	0.00	0.00
SANTA CLARA	558	0.03	0.00	\$443,821	0.09	0.00
SANTA CRUZ	9,414	0.58	0.00	\$6,413,428	1.35	0.00
SHASTA	191,818	11.78	1.45	\$43,948,866	9.26	0.82
SIERRA	50,105	3.08	32.00	\$9,437,066	1.99	30.40
SISKIYOU	246,141	15.14	23.41	\$59,343,592	12.51	19.18
SOLANO	0	0.00	0.00	\$16,258	0.00	0.00
SONOMA	10,646	0.65	0.00	\$5,497,566	1.16	0.00
STANISLAUS	0	0.00	0.00	\$0	0.00	0.00
SUTTER	0	0.00	0.00	\$0	0.00	0.00
TEHAMA	46,531	2.86	0.00	\$12,975,879	2.74	0.00
TRINITY	81,988	5.04	18.72	\$17,142,845	3.61	14.92
TULARE	1,743	0.11	65.12	\$295,552	0.06	60.08
TUOLUMNE	50,558	3.11	33.85	\$9,249,302	1.95	24.61
VENTURA	0	0.00	0.00	\$17,104	0.00	0.00
YOLO	0	0.00	0.00	\$0	0.00	0.00
YUBA	16,278	1.00	0.15	\$5,014,250	1.06	0.09
ALL COUNTIES	1,626,116	100.00	11.47	\$474,397,608	100.00	6.68

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REPORT YT-36  
TIMBER TAX SECTIONCALIFORNIA TIMBER HARVEST BY COUNTY  
2008 QUARTERS 1 TO 4

4/8/09

COUNTY	VOLUME (NET MBF)	VOLUME PERCENT	PERCENT PUBLIC	VALUE	VALUE PERCENT	PERCENT PUBLIC
ALAMEDA	0	0.00	0.00	\$10,170	0.00	0.00
ALPINE	0	0.00	0.00	\$0	0.00	0.00
AMADOR	24626	1.79	28.27	\$3,285,001	1.02	22.12
BUTTE	92484	6.74	0.20	\$15,998,229	4.95	0.18
CALAVERAS	33235	2.42	1.01	\$4,720,135	1.46	0.88
COLUSA	0	0.00	0.00	\$0	0.00	0.00
CONTRA COSTA	0	0.00	0.00	\$5,724	0.00	0.00
DEL NORTE	12572	0.92	0.00	\$5,164,941	1.60	0.00
EL DORADO	44726	3.26	12.91	\$5,963,675	1.84	11.13
FRESNO	7248	0.53	33.25	\$898,194	0.28	15.16
GLENN	1173	0.09	100.00	\$147,215	0.05	100.00
HUMBOLDT	227339	16.59	0.07	\$104,797,337	32.43	0.07
IMPERIAL	0	0.00	0.00	\$0	0.00	0.00
INYO	0	0.00	0.00	\$0	0.00	0.00
KERN	2092	0.15	0.00	\$238,657	0.07	0.00
KINGS	0	0.00	0.00	\$0	0.00	0.00
LAKE	0	0.00	0.00	\$0	0.00	0.00
LASSEN	35450	2.58	21.57	\$4,598,595	1.42	19.02
LOS ANGELES	0	0.00	0.00	\$0	0.00	0.00
MADERA	621	0.05	95.01	\$85,962	0.03	76.10
MARIN	0	0.00	0.00	\$0	0.00	0.00
MARIPOSA	2471	0.18	0.00	\$459,210	0.14	0.00
MENDOCINO	92652	6.75	0.42	\$39,209,408	12.13	0.15
MERCED	0	0.00	0.00	\$6,300	0.00	0.00
MODOC	15709	1.14	4.91	\$1,870,755	0.58	4.32
MONO	0	0.00	0.00	\$24,110	0.01	100.00
MONTEREY	0	0.00	0.00	\$3,314	0.00	0.00
NAPA	0	0.00	0.00	\$14,121	0.00	0.00
NEVADA	31122	2.27	19.72	\$5,679,127	1.76	17.91
ORANGE	0	0.00	0.00	\$24,597	0.01	0.00
PLACER	23129	1.69	29.11	\$3,719,334	1.15	20.90
PLUMAS	146094	10.65	9.64	\$22,297,325	6.80	11.25
RIVERSIDE	0	0.00	0.00	\$0	0.00	0.00
SACRAMENTO	0	0.00	0.00	\$28,440	0.01	0.00
SAN BENITO	0	0.00	0.00	\$0	0.00	0.00
SAN BERNARDINO	0	0.00	0.00	\$0	0.00	0.00
SAN DIEGO	0	0.00	0.00	\$8,647	0.00	0.00
SAN FRANCISCO	0	0.00	0.00	\$0	0.00	0.00
SAN JOAQUIN	0	0.00	0.00	\$4,239	0.00	0.00
SAN LUIS OBISPO	0	0.00	0.00	\$9,570	0.00	0.00
SAN MATEO	2742	0.20	0.00	\$1,801,217	0.56	0.00
SANTA BARBARA	0	0.00	0.00	\$0	0.00	0.00
SANTA CLARA	847	0.06	0.00	\$517,826	0.16	0.00
SANTA CRUZ	12715	0.93	0.00	\$7,925,336	2.45	0.00
SHASTA	216661	15.79	0.30	\$33,600,995	10.39	0.20
SIERRA	9790	0.71	4.87	\$1,012,773	0.31	3.87
SISKIYOU	147278	10.73	15.71	\$27,042,757	8.36	12.10
SOLANO	0	0.00	0.00	\$12,645	0.00	0.00
SONOMA	11835	0.86	0.00	\$6,806,279	2.11	0.00
STANISLAUS	0	0.00	0.00	\$0	0.00	0.00
SUTTER	0	0.00	0.00	\$0	0.00	0.00
TEHAMA	63877	4.66	0.00	\$9,853,814	3.05	0.00
TRINITY	50968	3.71	3.61	\$7,151,987	2.21	3.11
TULARE	1028	0.07	15.95	\$67,767	0.02	22.93
TUOLUMNE	52975	3.86	36.93	\$5,705,404	1.76	39.76
VENTURA	0	0.00	0.00	\$9,891	0.00	0.00
YOLO	0	0.00	0.00	\$0	0.00	0.00
YUBA	8565	0.62	0.58	\$2,514,107	0.78	0.24
<b>ALL COUNTIES</b>	<b>1,372,024</b>	<b>100.00</b>	<b>7.23</b>	<b>\$323,292,930</b>	<b>100.00</b>	<b>4.05</b>

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REPORT YT-36	CALIFORNIA TIMBER HARVEST BY COUNTY			COMPILED ON 4/22/2010		
YTHR2	YEAR 2009 QUARTER 1 TO 4					
TIMBER TAX SECTION	VOLUME	VOLUME	PERCENT	VALUE	VALUE	PERCENT
COUNTY	(NET MBF)	PERCENT	PUBLIC		PERCENT	PUBLIC
ALAMEDA	0	0.00	0.00	\$10,545	0.01	0.00
ALPINE	0	0.00	0.00	\$0	0.00	0.00
AMADOR	5,927	0.74	0.00	\$438,921	0.44	0.00
BUTTE	70,688	8.78	0.00	\$4,428,550	4.46	0.00
CALAVERAS	16,162	2.01	0.00	\$2,474,230	2.49	0.00
COLUSA	0	0.00	0.00	\$0	0.00	0.00
CONTRA COSTA	0	0.00	0.00	\$7,245	0.01	0.00
DEL NORTE	4,298	0.53	0.00	\$1,262,453	1.27	0.00
EL DORADO	20,181	2.51	0.36	\$1,775,776	1.79	0.31
FRESNO	5,418	0.67	33.26	\$202,633	0.20	26.13
GLENN	0	0.00	0.00	\$0	0.00	0.00
HUMBOLDT	110,197	13.69	0.27	\$27,494,550	27.70	0.11
IMPERIAL	0	0.00	0.00	\$0	0.00	0.00
INYO	0	0.00	0.00	\$0	0.00	0.00
KERN	1,096	0.14	50.36	\$141,605	0.14	0.68
KINGS	0	0.00	0.00	\$0	0.00	0.00
LAKE	0	0.00	0.00	\$0	0.00	0.00
LASSEN	31,015	3.85	20.25	\$1,898,056	1.91	18.76
LOS ANGELES	0	0.00	0.00	\$0	0.00	0.00
MADERA	278	0.03	100.00	\$35,898	0.04	49.86
MARIN	0	0.00	0.00	\$0	0.00	0.00
MARIPOSA	2,229	0.28	0.00	\$648,465	0.65	0.00
MENDOCINO	43,801	5.44	0.00	\$12,315,524	12.41	0.00
MERCED	0	0.00	0.00	\$6,195	0.01	0.00
MODOC	10,611	1.32	8.85	\$764,500	0.77	5.55
MONO	13	0.00	100.00	\$11,458	0.01	100.00
MONTEREY	0	0.00	0.00	\$3,610	0.00	0.00
NAPA	0	0.00	0.00	\$0	0.00	0.00
NEVADA	24,028	2.98	5.15	\$2,688,966	2.71	1.90
ORANGE	0	0.00	0.00	\$23,166	0.02	0.00
PLACER	11,092	1.38	15.94	\$782,451	0.79	15.40
PLUMAS	63,742	7.92	29.11	\$4,070,982	4.10	35.51
RIVERSIDE	0	0.00	0.00	\$0	0.00	0.00
SACRAMENTO	0	0.00	0.00	\$24,534	0.02	0.00
SAN BENITO	0	0.00	0.00	\$0	0.00	0.00
SAN BERNARDINO	0	0.00	0.00	\$0	0.00	0.00
SAN DIEGO	0	0.00	0.00	\$7,474	0.01	0.00
SAN FRANCISCO	0	0.00	0.00	\$0	0.00	0.00
SAN JOAQUIN	0	0.00	0.00	\$3,204	0.00	0.00
SAN LUIS OBISPO	0	0.00	0.00	\$7,407	0.01	0.00
SAN MATEO	1,715	0.21	0.00	\$761,201	0.77	0.00
SANTA BARBARA	0	0.00	0.00	\$0	0.00	0.00
SANTA CLARA	1,083	0.13	0.00	\$576,574	0.58	0.00
SANTA CRUZ	8,404	1.04	0.00	\$3,529,244	3.56	0.00
SHASTA	100,081	12.43	4.07	\$7,031,927	7.09	3.13
SIERRA	8,632	1.07	5.75	\$606,928	0.61	12.78
SISKIYOU	118,512	14.72	7.77	\$11,648,293	11.74	4.66
SOLANO	0	0.00	0.00	\$14,191	0.01	0.00
SONOMA	1,228	0.15	0.00	\$512,219	0.52	0.00
STANISLAUS	0	0.00	0.00	\$0	0.00	0.00
SUTTER	0	0.00	0.00	\$0	0.00	0.00
TEHAMA	55,137	6.85	0.00	\$5,366,637	5.41	0.00
TRINITY	48,154	5.98	13.05	\$3,125,180	3.15	11.65
TULARE	1,891	0.23	24.11	\$93,391	0.09	0.49
TUOLUMNE	28,976	3.35	27.53	\$1,836,441	1.85	20.55
VENTURA	0	0.00	0.00	\$8,851	0.01	0.00
YOLO	0	0.00	0.00	\$0	0.00	0.00
YUBA	12,371	1.54	0.00	\$2,605,609	2.63	0.00
<b>ALL COUNTIES</b>	<b>804,940</b>	<b>100.00</b>	<b>7.40</b>	<b>\$99,247,082</b>	<b>100.00</b>	<b>3.75</b>

REPORT YT-36	CALIFORNIA TIMBER HARVEST BY COUNTY			COMPILED ON 4/8/2011		
YTHR2	YEAR 2010 QUARTER 1 TO 4					
TIMBER TAX SECTION	VOLUME	VOLUME	PERCENT	VALUE	VALUE	PERCENT
COUNTY	(NET MBF)	PERCENT	PUBLIC		PERCENT	PUBLIC
ALAMEDA	0	0.00	0.00	\$16,065	0.01	0.00
ALPINE	2,192	0.19	98.63	\$123,540	0.06	99.98
AMADOR	7,718	0.67	0.00	\$719,056	0.36	0.00
BUTTE	31,739	2.73	0.00	\$4,740,984	2.38	0.00
CALAVERAS	25,679	2.21	24.88	\$1,829,586	0.92	26.51
COLUSA	0	0.00	0.00	\$0	0.00	0.00
CONTRA COSTA	0	0.00	0.00	\$8,145	0.00	0.00
DEL NORTE	6,680	0.58	0.00	\$2,441,284	1.22	0.00
EL DORADO	19,832	1.71	21.38	\$1,201,507	0.60	17.93
FRESNO	7,314	0.63	28.27	\$299,752	0.15	19.84
GLENN	0	0.00	0.00	\$0	0.00	0.00
HUMBOLDT	218,651	18.84	0.00	\$68,036,992	34.10	0.00
IMPERIAL	0	0.00	0.00	\$0	0.00	0.00
INYO	0	0.00	0.00	\$6,015	0.00	100.00
KERN	1,543	0.13	100.00	\$32,088	0.02	100.00
KINGS	0	0.00	0.00	\$0	0.00	0.00
LAKE	3,552	0.31	68.83	\$207,730	0.10	71.87
LASSEN	47,418	4.09	10.06	\$4,666,859	2.35	7.27
LOS ANGELES	0	0.00	0.00	\$0	0.00	0.00
MADERA	3,553	0.31	99.41	\$255,499	0.13	99.69
MARIN	0	0.00	0.00	\$0	0.00	0.00
MARIPOSA	5,113	0.44	70.17	\$420,750	0.21	59.97
MENDOCINO	94,724	8.18	0.00	\$29,256,218	14.66	0.00
MERCED	0	0.00	0.00	\$6,300	0.00	0.00
MODOC	18,496	1.59	19.99	\$2,293,345	1.15	28.38
MONO	0	0.00	0.00	\$7,222	0.00	53.79
MONTEREY	0	0.00	0.00	\$3,604	0.00	0.00
NAPA	0	0.00	0.00	\$0	0.00	0.00
NEVADA	12,187	1.05	15.58	\$1,041,564	0.52	9.84
ORANGE	0	0.00	0.00	\$24,862	0.01	0.00
PLACER	42,071	3.62	19.84	\$4,603,208	2.31	10.54
PLUMAS	88,996	7.67	41.90	\$10,059,301	5.04	38.70
RIVERSIDE	0	0.00	0.00	\$0	0.00	0.00
SACRAMENTO	0	0.00	0.00	\$19,845	0.01	0.00
SAN BENITO	0	0.00	0.00	\$0	0.00	0.00
SAN BERNARDINO	0	0.00	0.00	\$0	0.00	0.00
SAN DIEGO	0	0.00	0.00	\$8,527	0.00	0.00
SAN FRANCISCO	0	0.00	0.00	\$0	0.00	0.00
SAN JOAQUIN	0	0.00	0.00	\$2,106	0.00	0.00
SAN LUIS OBISPO	0	0.00	0.00	\$7,317	0.00	0.00
SAN MATEO	4,706	0.41	0.00	\$2,290,818	1.15	0.00
SANTA BARBARA	0	0.00	0.00	\$0	0.00	0.00
SANTA CLARA	1,062	0.09	0.00	\$531,700	0.27	0.00
SANTA CRUZ	13,359	1.15	0.00	\$4,776,316	2.39	0.00
SHASTA	151,116	13.02	4.01	\$16,665,093	8.35	2.22
SIERRA	20,755	1.79	44.01	\$2,180,334	1.09	33.54
SISKIYOU	188,750	16.28	11.08	\$22,975,800	11.52	5.95
SOLANO	0	0.00	0.00	\$14,925	0.01	0.00
SONOMA	8,902	0.77	0.00	\$4,020,231	2.02	0.00
STANISLAUS	0	0.00	0.00	\$0	0.00	0.00
SUTTER	0	0.00	0.00	\$0	0.00	0.00
TEHAMA	53,934	4.65	0.00	\$5,763,876	2.90	0.00
TRINITY	36,363	3.13	0.82	\$3,732,831	1.87	0.29
TULARE	1,741	0.15	71.80	\$68,691	0.03	74.48
TUOLUMNE	23,596	2.03	50.35	\$1,154,992	0.58	45.90
VENTURA	0	0.00	0.00	\$13,870	0.01	0.00
YOLO	0	0.00	0.00	\$0	0.00	0.00
YUBA	19,846	1.62	25.50	\$2,934,172	1.47	24.03
ALL COUNTIES	1,180,588	100.00	11.74	\$199,504,902	100.00	5.40

REPORT YT-36		CALIFORNIA TIMBER HARVEST BY COUNTY			COMPILED ON 4/18/2012	
YTHR2		YEAR 2011 QUARTER 1 TO 4				
TIMBER TAX SECTION						
COUNTY	VOLUME (NET MBF)	VOLUME PERCENT	PERCENT PUBLIC	VALUE	VALUE PERCENT	PERCENT PUBLIC
ALAMEDA	0	0.00	0.00	\$15,525	0.01	0.00
ALPINE	0	0.00	0.00	\$0	0.00	0.00
AMADOR	9,979	0.77	17.96	\$1,267,250	0.47	12.73
BUTTE	42,617	3.31	1.48	\$9,458,911	3.47	0.79
CALAVERAS	33,661	2.61	4.05	\$4,144,867	1.52	5.78
COLUSA	1,743	0.14	100.00	\$156,675	0.06	100.00
CONTRA COSTA	0	0.00	0.00	\$6,225	0.00	0.00
DEL NORTE	9,158	0.73	0.00	\$2,789,092	1.02	0.00
EL DORADO	40,467	3.14	14.64	\$4,750,723	1.74	10.07
FRESNO	17,780	1.38	74.55	\$1,447,348	0.53	70.24
GLENN	372	0.03	100.00	\$66,480	0.02	100.00
HUMBOLDT	216,272	16.79	0.00	\$65,778,020	24.14	0.00
IMPERIAL	0	0.00	0.00	\$0	0.00	0.00
INYO	0	0.00	0.00	\$0	0.00	0.00
KERN	3,671	0.30	37.74	\$175,923	0.06	41.36
KINGS	0	0.00	0.00	\$0	0.00	0.00
LAKE	382	0.03	0.00	\$45,915	0.02	0.00
LASSEN	78,977	6.13	10.21	\$12,172,740	4.47	6.69
LOS ANGELES	0	0.00	0.00	\$0	0.00	0.00
MADERA	3,639	0.30	98.93	\$281,850	0.10	99.25
MARIN	0	0.00	0.00	\$0	0.00	0.00
MARIPOSA	4,563	0.35	4.71	\$561,801	0.21	3.03
MENDOCINO	89,795	6.97	0.00	\$25,761,584	9.45	0.00
MERCED	0	0.00	0.00	\$8,400	0.00	0.00
MODOC	24,057	1.87	6.83	\$4,550,640	1.67	3.25
MONO	30	0.00	100.00	\$17,310	0.01	100.00
MONTEREY	0	0.00	0.00	\$4,387	0.00	0.00
NAPA	0	0.00	0.00	\$0	0.00	0.00
NEVADA	16,147	1.25	8.41	\$3,248,939	1.19	5.68
ORANGE	0	0.00	0.00	\$25,653	0.01	0.00
PLACER	28,703	2.23	35.37	\$5,254,369	1.93	26.47
PLUMAS	74,370	5.77	27.84	\$11,510,228	4.22	13.03
RIVERSIDE	0	0.00	0.00	\$0	0.00	0.00
SACRAMENTO	0	0.00	0.00	\$34,632	0.01	0.00
SAN BENITO	0	0.00	0.00	\$0	0.00	0.00
SAN BERNARDINO	0	0.00	0.00	\$0	0.00	0.00
SAN DIEGO	0	0.00	0.00	\$9,254	0.00	0.00
SAN FRANCISCO	0	0.00	0.00	\$0	0.00	0.00
SAN JOAQUIN	0	0.00	0.00	\$135	0.00	0.00
SAN LUIS OBISPO	0	0.00	0.00	\$6,109	0.00	0.00
SAN MATEO	6,060	0.47	0.00	\$2,709,322	0.99	0.00
SANTA BARBARA	0	0.00	0.00	\$0	0.00	0.00
SANTA CLARA	556	0.04	0.00	\$300,384	0.11	0.00
SANTA CRUZ	7,731	0.60	0.00	\$2,644,572	1.04	0.00
SHASTA	186,833	14.50	6.00	\$40,381,470	14.82	2.78
SIERRA	22,044	1.71	41.09	\$3,840,151	1.41	27.91
SISKIYOU	194,564	15.10	25.22	\$39,211,863	14.39	21.13
SOLANO	0	0.00	0.00	\$15,912	0.01	0.00
SONOMA	6,542	0.51	0.00	\$1,728,445	0.63	0.00
STANISLAUS	0	0.00	0.00	\$0	0.00	0.00
SUTTER	0	0.00	0.00	\$0	0.00	0.00
TEHAMA	58,885	4.42	2.38	\$10,634,572	3.90	1.15
TRINITY	40,316	3.13	11.84	\$5,588,772	2.05	10.28
TULARE	1,497	0.12	0.00	\$132,200	0.05	0.00
TUOLUMNE	44,164	3.43	13.84	\$6,518,225	2.39	13.07
VENTURA	0	0.00	0.00	\$13,356	0.00	0.00
YOLO	0	0.00	0.00	\$0	0.00	0.00
YUBA	24,072	1.87	14.76	\$5,017,453	1.84	16.82
ALL COUNTIES	1,286,325	100.00	12.24	\$272,469,681	100.00	7.15

REPORT YT-36	CALIFORNIA TIMBER HARVEST BY COUNTY				COMPILED ON 4/23/2013	
YTHR2	YEAR 2012 QUARTER 1 TO 4					
TIMBER TAX SECTION						
COUNTY	VOLUME (NET MBF)	VOLUME PERCENT	PERCENT PUBLIC	VALUE	VALUE PERCENT	PERCENT PUBLIC
ALAMEDA	0	0.00	0.00	\$0	0.00	0.00
ALPINE	0	0.00	0.00	\$0	0.00	0.00
AMADOR	10,594	0.81	9.35	\$2,121,045	0.79	4.20
BUTTE	45,198	3.48	4.54	\$9,573,425	3.58	1.93
CALAVERAS	39,458	3.02	7.67	\$6,755,461	2.53	6.55
COLUSA	0	0.00	0.00	\$0	0.00	0.00
CONTRA COSTA	0	0.00	0.00	\$0	0.00	0.00
DEL NORTE	5,203	0.40	0.00	\$1,290,905	0.48	0.00
EL DORADO	48,547	3.71	24.10	\$7,075,521	2.65	18.09
FRESNO	13,129	1.00	56.40	\$1,271,349	0.48	46.61
GLENN	4,520	0.35	100.00	\$765,057	0.29	100.00
HUMBOLDT	221,617	16.95	1.50	\$62,557,351	23.39	1.10
IMPERIAL	0	0.00	0.00	\$0	0.00	0.00
INYO	0	0.00	0.00	\$0	0.00	0.00
KERN	3,943	0.30	49.71	\$375,045	0.14	57.46
KINGS	0	0.00	0.00	\$0	0.00	0.00
LAKE	56	0.00	46.43	\$7,900	0.00	41.14
LASSEN	74,433	5.69	18.06	\$12,997,465	4.86	13.44
LOS ANGELES	0	0.00	0.00	\$0	0.00	0.00
MADERA	9,900	0.76	89.91	\$610,301	0.30	88.90
MARIN	0	0.00	0.00	\$0	0.00	0.00
MARIPOSA	3,031	0.23	0.00	\$370,270	0.14	0.00
MENDOCINO	121,850	9.32	0.00	\$26,940,454	10.82	0.00
MERCED	0	0.00	0.00	\$8,295	0.00	0.00
MODOC	40,006	3.06	21.94	\$4,568,740	1.71	20.81
MONO	2,349	0.18	100.00	\$201,590	0.08	98.72
MONTEREY	0	0.00	0.00	\$3,003	0.00	0.00
NAPA	0	0.00	0.00	\$0	0.00	0.00
NEVADA	14,531	1.11	3.72	\$2,647,665	0.99	3.60
ORANGE	0	0.00	0.00	\$25,804	0.01	0.00
PLACER	20,951	1.60	43.88	\$3,300,234	1.23	28.76
PLUMAS	94,652	6.48	14.81	\$13,689,163	5.11	13.58
RIVERSIDE	0	0.00	0.00	\$0	0.00	0.00
SACRAMENTO	0	0.00	0.00	\$40,374	0.01	0.00
SAN BENITO	0	0.00	0.00	\$0	0.00	0.00
SAN BERNARDINO	0	0.00	0.00	\$0	0.00	0.00
SAN DIEGO	0	0.00	0.00	\$10,189	0.00	0.00
SAN FRANCISCO	0	0.00	0.00	\$0	0.00	0.00
SAN JOAQUIN	0	0.00	0.00	\$0	0.00	0.00
SAN LUIS OBISPO	0	0.00	0.00	\$0	0.00	0.00
SAN MATEO	5,547	0.42	0.00	\$1,979,488	0.74	0.00
SANTA BARBARA	0	0.00	0.00	\$0	0.00	0.00
SANTA CLARA	1,209	0.09	0.00	\$429,172	0.16	0.00
SANTA CRUZ	6,559	0.50	0.00	\$2,363,485	0.88	0.00
SHASTA	185,789	14.21	3.05	\$36,830,938	13.81	1.07
SIERRA	30,748	2.35	32.82	\$4,115,291	1.54	27.86
SISKIYOU	144,874	11.08	18.68	\$30,767,666	11.51	17.16
SOLANO	0	0.00	0.00	\$23,929	0.01	0.00
SONOMA	4,428	0.34	0.00	\$770,936	0.29	0.00
STANISLAUS	0	0.00	0.00	\$0	0.00	0.00
SUTTER	0	0.00	0.00	\$0	0.00	0.00
TEHAMA	66,795	5.11	0.00	\$11,611,657	4.34	0.00
TRINITY	37,868	2.90	11.91	\$7,785,690	2.91	8.51
TULARE	2,433	0.19	0.00	\$214,647	0.08	0.00
TUOLUMNE	35,359	2.70	19.88	\$6,073,861	2.27	15.33
VENTURA	0	0.00	0.00	\$12,316	0.00	0.00
YOLO	0	0.00	0.00	\$0	0.00	0.00
YUBA	21,752	1.66	20.36	\$4,950,991	1.85	19.57
<b>ALL COUNTIES</b>	<b>1,307,337</b>	<b>100.00</b>	<b>11.44</b>	<b>\$267,417,273</b>	<b>100.00</b>	<b>7.54</b>

REPORT YT-36	CALIFORNIA TIMBER HARVEST BY COUNTY			COMPILED ON 4/30/2014		
YTHR2	YEAR 2013 QUARTER 1 TO 4					
TIMBER TAX SECTION						
COUNTY	VOLUME (NET MBF)	VOLUME PERCENT	PERCENT PUBLIC	VALUE	VALUE PERCENT	PERCENT PUBLIC
ALAMEDA	0	0.00	0.00	\$0	0.00	0.00
ALPINE	0	0.00	0.00	\$12,600	0.00	0.00
AMADOR	13,185	0.80	1.46	\$2,847,555	0.90	1.33
BUTTE	38,101	2.32	2.76	\$8,283,311	2.63	2.77
CALAVERAS	36,257	2.20	7.96	\$6,894,683	2.19	6.35
COLUSA	846	0.05	0.00	\$56,744	0.02	0.00
CONTRA COSTA	0	0.00	0.00	\$0	0.00	0.00
DEL NORTE	8,976	0.55	0.00	\$2,451,513	0.78	0.00
EL DORADO	69,218	4.21	16.64	\$11,369,766	3.61	14.12
FRESNO	15,017	0.91	73.61	\$1,990,320	0.44	68.63
GLENN	1,048	0.06	29.87	\$204,580	0.06	21.21
HUMBOLDT	259,822	15.79	0.04	\$72,517,208	23.02	0.01
IMPERIAL	0	0.00	0.00	\$0	0.00	0.00
INYO	0	0.00	0.00	\$0	0.00	0.00
KERN	2,655	0.16	100.00	\$187,170	0.06	100.00
KINGS	0	0.00	0.00	\$0	0.00	0.00
LAKE	988	0.06	84.78	\$181,920	0.06	94.38
LASSEN	59,995	3.65	12.58	\$11,349,943	3.60	5.42
LOS ANGELES	0	0.00	0.00	\$0	0.00	0.00
MADERA	5,769	0.35	95.93	\$458,909	0.15	97.39
MARIN	0	0.00	0.00	\$0	0.00	0.00
MARIPOSA	5,060	0.31	0.00	\$631,739	0.20	0.00
MENDOCINO	111,574	6.78	0.00	\$28,975,151	8.56	0.00
MERCED	0	0.00	0.00	\$9,030	0.00	0.00
MODOC	65,445	3.98	17.04	\$12,497,974	3.97	14.14
MONO	444	0.03	100.00	\$57,830	0.02	93.87
MONTEREY	0	0.00	0.00	\$5,695	0.00	0.00
NAPA	125	0.01	0.00	\$15,000	0.00	0.00
NEVADA	25,290	1.54	0.15	\$4,924,901	1.56	0.12
ORANGE	0	0.00	0.00	\$25,027	0.01	0.00
PLACER	59,262	3.60	43.45	\$8,997,682	2.86	34.60
PLUMAS	129,738	7.88	34.98	\$16,933,492	5.38	27.95
RIVERSIDE	0	0.00	0.00	\$0	0.00	0.00
SACRAMENTO	0	0.00	0.00	\$39,420	0.01	0.00
SAN BENITO	0	0.00	0.00	\$0	0.00	0.00
SAN BERNARDINO	0	0.00	0.00	\$0	0.00	0.00
SAN DIEGO	0	0.00	0.00	\$8,671	0.00	0.00
SAN FRANCISCO	0	0.00	0.00	\$0	0.00	0.00
SAN JOAQUIN	0	0.00	0.00	\$0	0.00	0.00
SAN LUIS OBISPO	0	0.00	0.00	\$10,069	0.00	0.00
SAN MATEO	5,927	0.34	0.00	\$2,474,946	0.79	0.00
SANTA BARBARA	0	0.00	0.00	\$0	0.00	0.00
SANTA CLARA	0	0.00	0.00	\$39,276	0.01	0.00
SANTA CRUZ	7,828	0.48	0.00	\$3,434,525	1.09	0.00
SHASTA	304,760	18.52	8.99	\$45,472,328	14.44	3.76
SIERRA	23,607	1.43	41.67	\$3,926,297	1.25	37.34
SISKIYOU	164,522	10.00	21.44	\$33,049,583	10.49	16.81
SOLANO	0	0.00	0.00	\$18,200	0.01	0.00
SONOMA	13,487	0.82	0.00	\$3,553,061	1.13	0.00
STANISLAUS	0	0.00	0.00	\$0	0.00	0.00
SUTTER	0	0.00	0.00	\$0	0.00	0.00
TEHAMA	92,774	5.64	1.18	\$12,287,114	3.90	1.67
TRINITY	25,198	1.53	19.64	\$5,134,855	1.63	11.66
TULARE	2,997	0.18	0.00	\$314,993	0.10	0.00
TUOLUMNE	60,507	4.89	21.12	\$12,413,983	3.94	21.43
VENTURA	0	0.00	0.00	\$15,645	0.00	0.00
YOLO	0	0.00	0.00	\$0	0.00	0.00
YUBA	15,326	0.93	6.89	\$3,487,038	1.11	7.05
ALL COUNTIES	1,645,446	100.00	13.56	\$314,957,647	100.00	8.53

REPORT Y7-36	CALIFORNIA TIMBER HARVEST BY COUNTY			COMPILED ON 5/4/2015		
YTHR2	YEAR 2014 QUARTER 1 TO 4					
TIMBER TAX SECTION	VOLUME	VOLUME	PERCENT	VALUE	VALUE	PERCENT
COUNTY	(NET MBF)	PERCENT	PUBLIC		PERCENT	PUBLIC
ALAMEDA	0	0.00	0.00	\$0	0.00	0.00
ALPINE	0	0.00	0.00	\$0	0.00	0.00
AMADOR	4,429	0.30	0.00	\$901,275	0.28	0.00
BLTTE	42,799	2.92	20.31	\$8,628,351	2.68	11.10
CALAVERAS	1,948	0.13	42.92	\$340,919	0.11	31.96
COLUSA	193	0.01	0.00	\$15,890	0.00	0.00
CONTRA COSTA	0	0.00	0.00	\$0	0.00	0.00
DEL NORTE	20,550	1.40	0.00	\$5,620,991	1.74	0.00
EL DORADO	55,371	3.78	21.17	\$8,098,105	2.51	13.73
FRESNO	26,508	1.81	97.78	\$2,382,317	0.73	98.10
GLENN	0	0.00	0.00	\$0	0.00	0.00
HUMBOLDT	244,697	16.89	0.75	\$81,513,089	25.29	0.22
IMPERIAL	0	0.00	0.00	\$0	0.00	0.00
INYO	0	0.00	0.00	\$0	0.00	0.00
KERN	1,432	0.10	69.06	\$167,450	0.05	76.24
KINGS	0	0.00	0.00	\$0	0.00	0.00
LAKE	1,721	0.12	91.52	\$397,690	0.12	92.75
LASSEN	29,306	2.00	7.63	\$6,309,432	1.96	2.41
LOS ANGELES	0	0.00	0.00	\$0	0.00	0.00
MADERA	2,348	0.16	90.72	\$239,560	0.07	96.35
MARIN	0	0.00	0.00	\$0	0.00	0.00
MARIPOSA	4,406	0.30	0.00	\$631,146	0.20	0.00
MENDOCINO	115,197	7.86	0.00	\$34,681,018	10.75	0.00
MERCED	0	0.00	0.00	\$8,400	0.00	0.00
MODOC	79,136	5.40	12.29	\$13,220,845	4.10	9.00
MONO	0	0.00	0.00	\$0	0.00	0.00
MONTEREY	0	0.00	0.00	\$0	0.00	0.00
NAPA	0	0.00	0.00	\$0	0.00	0.00
NEVADA	8,211	0.56	11.51	\$1,843,089	0.57	7.19
ORANGE	0	0.00	0.00	\$24,952	0.01	0.00
PLACER	74,601	5.09	46.01	\$12,145,012	3.77	36.93
PLUMAS	97,207	6.63	29.08	\$18,416,398	5.71	19.11
RIVERSIDE	0	0.00	0.00	\$0	0.00	0.00
SACRAMENTO	0	0.00	0.00	\$23,596	0.01	0.00
SAN BENITO	0	0.00	0.00	\$0	0.00	0.00
SAN BERNARDINO	0	0.00	0.00	\$0	0.00	0.00
SAN DIEGO	0	0.00	0.00	\$14,905	0.00	0.00
SAN FRANCISCO	0	0.00	0.00	\$0	0.00	0.00
SAN JOAQUIN	0	0.00	0.00	\$0	0.00	0.00
SAN LUIS OBISPO	0	0.00	0.00	\$8,925	0.00	0.00
SAN MATEO	6,724	0.46	0.00	\$3,426,019	1.06	0.00
SANTA BARBARA	0	0.00	0.00	\$0	0.00	0.00
SANTA CLARA	12	0.00	0.00	\$47,653	0.01	0.00
SANTA CRUZ	11,048	0.75	0.00	\$5,262,461	1.63	0.00
SHASTA	192,176	13.11	2.85	\$39,861,298	12.37	1.29
SIERRA	24,461	1.67	18.23	\$5,530,411	1.72	10.82
SISKIYOU	193,730	12.54	16.33	\$36,744,542	11.40	7.78
SOLANO	0	0.00	0.00	\$14,595	0.00	0.00
SONOMA	13,440	0.92	0.00	\$3,843,276	1.19	0.00
STANISLAUS	0	0.00	0.00	\$0	0.00	0.00
SUTTER	0	0.00	0.00	\$0	0.00	0.00
TEHAMA	48,570	3.31	0.00	\$10,406,073	3.23	0.00
TRINITY	32,401	2.21	10.15	\$5,443,945	1.69	9.42
TULARE	2,393	0.16	21.81	\$193,061	0.06	35.69
TUOLUMNE	130,323	8.89	47.72	\$13,161,383	4.08	54.45
VENTURA	0	0.00	0.00	\$19,992	0.01	0.00
YOLO	0	0.00	0.00	\$0	0.00	0.00
YUBA	10,353	0.71	0.00	\$2,739,044	0.85	0.00
ALL COUNTIES	1,465,691	100.00	16.04	\$322,287,100	100.00	8.25



REPORT YT-36		CALIFORNIA TIMBER HARVEST BY COUNTY			COMPILED ON 5/6/2016		
YTHR2		YEAR 2015 QUARTER 1 TO 4					
TIMBER TAX SECTION							
COUNTY	VOLUME (NET MBF)	VOLUME PERCENT	PERCENT PUBLIC	VALUE	VALUE PERCENT	PERCENT PUBLIC	
ALAMEDA	0	0.00	0.00	\$15,000	0.00	0.00	
ALPINE	0	0.00	0.00	\$0	0.00	0.00	
AMADOR	1,753	0.11	0.00	\$390,325	0.12	0.00	
BUTTE	60,559	3.81	0.00	\$13,717,316	4.15	0.00	
CALAVERAS	9,717	0.61	0.00	\$1,719,073	0.52	0.00	
COLUSA	0	0.00	0.00	\$0	0.00	0.00	
CONTRA COSTA	0	0.00	0.00	\$0	0.00	0.00	
DEL NORTE	47,638	2.99	0.00	\$12,907,811	3.88	0.00	
EL DORADO	180,032	11.32	1.87	\$13,180,934	3.89	3.27	
FRESNO	12,721	0.80	47.19	\$666,481	0.20	45.74	
GLENN	0	0.00	0.00	\$0	0.00	0.00	
HUMBOLDT	217,503	13.67	0.77	\$71,337,877	21.60	0.68	
IMPERIAL	0	0.00	0.00	\$0	0.00	0.00	
INYO	47	0.00	0.00	\$7,520	0.00	0.00	
KERN	2,516	0.16	28.34	\$163,417	0.05	23.98	
KINGS	0	0.00	0.00	\$0	0.00	0.00	
LAKE	330	0.02	0.00	\$29,447	0.01	0.00	
LASSSEN	57,822	3.63	4.56	\$9,695,302	2.94	3.45	
LOS ANGELES	0	0.00	0.00	\$0	0.00	0.00	
MADERA	8,071	0.51	100.00	\$720,829	0.22	100.00	
MARIN	0	0.00	0.00	\$0	0.00	0.00	
MARIPOSA	3,399	0.21	0.00	\$249,814	0.08	0.00	
MENDOCINO	121,701	7.65	0.00	\$41,150,958	12.46	0.00	
MERCED	0	0.00	0.00	\$9,450	0.00	0.00	
MODOC	71,419	4.49	11.39	\$9,588,000	2.90	8.62	
MONO	0	0.00	0.00	\$0	0.00	0.00	
MONTEREY	0	0.00	0.00	\$0	0.00	0.00	
NAPA	0	0.00	0.00	\$0	0.00	0.00	
NEVADA	10,358	0.65	6.51	\$2,344,639	0.71	2.78	
ORANGE	0	0.00	0.00	\$25,455	0.01	0.00	
PLACER	47,930	3.01	8.22	\$5,720,597	1.73	9.86	
PLUMAS	94,763	5.96	23.06	\$18,452,219	5.59	18.14	
RIVERSIDE	0	0.00	0.00	\$0	0.00	0.00	
SACRAMENTO	0	0.00	0.00	\$21,969	0.01	0.00	
SAN BENITO	0	0.00	0.00	\$0	0.00	0.00	
SAN BERNARDINO	0	0.00	0.00	\$9,940	0.00	100.00	
SAN DIEGO	0	0.00	0.00	\$16,332	0.00	0.00	
SAN FRANCISCO	0	0.00	0.00	\$0	0.00	0.00	
SAN JOAQUIN	0	0.00	0.00	\$0	0.00	0.00	
SAN LUIS OBISPO	0	0.00	0.00	\$7,362	0.00	0.00	
SAN MATEO	4,691	0.29	0.00	\$2,182,509	0.66	0.00	
SANTA BARBARA	0	0.00	0.00	\$0	0.00	0.00	
SANTA CLARA	38	0.00	0.00	\$49,870	0.02	0.00	
SANTA CRUZ	9,614	0.60	0.00	\$4,906,731	1.49	0.00	
SHASTA	196,989	12.51	10.70	\$40,238,541	12.19	6.84	
SIERRA	9,549	0.60	40.87	\$1,827,380	0.55	46.59	
SISKIYOU	249,143	15.66	15.52	\$53,336,097	16.15	13.34	
SOLANO	0	0.00	0.00	\$11,250	0.00	0.00	
SONOMA	13,722	0.86	0.00	\$4,604,208	1.39	0.00	
STANISLAUS	0	0.00	0.00	\$0	0.00	0.00	
SUTTER	0	0.00	0.00	\$0	0.00	0.00	
TEHAMA	18,762	1.18	6.21	\$3,196,493	0.97	3.28	
TRINITY	43,977	2.78	2.98	\$9,012,531	2.73	3.36	
TULARE	2,819	0.18	0.00	\$206,230	0.06	0.00	
TUOLUMNE	84,415	5.31	95.83	\$7,218,396	2.19	93.95	
VENTURA	0	0.00	0.00	\$15,580	0.00	0.00	
YOLO	0	0.00	0.00	\$0	0.00	0.00	
YUBA	6,747	0.42	6.09	\$1,374,603	0.42	6.38	
ALL COUNTIES	1,590,743	100.00	12.86	\$330,226,566	100.00	7.61	

## Responses to Letter C7 - Green Diamond Resource Company

**Comment C7-1:** The commenter states the RDEIR and supporting documents all incorrectly characterize the process of recognizing and/or determining the scope and extent of “legal parcels” and/or adjusting parcel boundaries as acts of conversion and/or subdivision of timberlands. The conclusion that determinations of legal status of parcels and lot line adjustments result in conversion of timberlands is not supported by substantial evidence, contradicts the conclusions of supporting documentation for the EIR, and misstates the findings reached by California resource agencies when reviewing the issue.

**Response to Comment C7-1:** The County recognizes that determinations of status, certificates of compliance, and/or lot line adjustments do not result in conversion of timberland by themselves. Other actions would need to follow, such as issuance of building permits for single family homes by the County or approval of timberland conversion permits by CalFire before conversion of timberland occurs.

Also, the County recognizes that determinations of status, certificates of compliance, and lot line adjustments can lead to more efficient timber management. Where the text of the EIR concludes that conversion of timberland solely due to determinations of status, certificates of compliance, or lot line adjustments of timberland, the text will be revised to clarify these actions do not by themselves convert timberland to other uses.

**Comment C7-2:** The commenter states some of the land use maps in the GPU are in error because they do not reflect the land use designations for their property that was tentatively approved by the Board of Supervisors.

**Response to Comment C7-2:** The corrections to the GPU land use maps will be brought forward to the Board of Supervisors with the GPU for adoption. The draft resolution of adoption will include findings that the corrections to the GPU land use maps align with the straw votes taken by the Board, and are a part of the project evaluated in the FEIR.

**Comment C7-3:** The commenter states the second paragraph on page 3.2-11 of the RDEIR characterizes determinations of status, certificates of compliance and lot line adjustments as acts of converting and/or subdividing timberland, which is not supported by substantial evidence, and that this statement needs to be revised or removed,

**Response to Comment C7-3:** The second paragraph on page 3.2-11 of the RDEIR is revised as follows:

“A study of the County’s agricultural and timberland conversions identified substantial amounts of land potentially lost to production through zone reclassifications, subdivisions, and conditionally permitted uses that conflict with agricultural and timber operations (Humboldt County Forest Resources and Policy Report, October 2003, updated in 2008). In addition to conversion occurring because of General Plan amendments and new subdivisions, resource lands may be ~~converted~~ impacted through a combination of 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 and other actions such as subdivisions or issuance of timberland conversion permits. Approximately 25 percent of all the Certificate of Compliance applications submitted from 1985 - 2000 occurred on agricultural properties and timberlands, affecting more than 18,000 acres. From 2001 to June 2005, this rate increased from 25 percent to over 67 percent, affecting over 53,000 acres. While some of those actions were precursors to conversion of timberland to other uses, most notably illicit cannabis cultivation, others provided for more efficient timber management."

**Comment C7-4:** The commenter states the third paragraph on page 3.2-11 of the RDEIR characterizes certificates of compliance as acts that change land use, which is not supported by substantial evidence, and that this statement needs to be revised or removed

**Response to Comment C7-4:** The third paragraph on page 3.2-11 of the RDEIR is revised as follows: "These changes in land use as a result of zone reclassifications, and subdivisions,~~and the issuances of Certificates of Compliance on historic parcels,~~ are primarily reflective of the breakup of old family ranches."

**Comment C7-5:** The commenter objects to the wording of the fourth paragraph on page 3.2-11 of the RDEIR that refers to conversion of timberland.

**Response to Comment C7-5:** The changes to the RDEIR made in response to comments C7-1 through C7-4 are sufficient to address this comment.

**Comment C7-6:** The commenter points out that the acreage of County parks on page 3.2-12 of the RDEIR does not include the recent acquisition of the McKay Community Forest (from the Green Diamond Resource Company).

**Response to Comment C7-6:** The first paragraph on page 3.2-12 of the RDEIR is revised as follows: "County parks and community parks account for ~~4,000~~ approximately 2,000 acres."

**Comment C7-7:** The commenter suggests the language on page 3.2-12 describing the county's timber industry should be updated, and provides updated information.

**Response to Comment C7-7** The third paragraph on page 3.2-12 of the RDEIR is revised as follows: "However, the County's timber industry has been in decline over the past 30 years. In 2000, the County's total gross value of timber production was \$285,232,953, for which Humboldt County ranked first in the state. By 2008, the total gross value of timber dropped to \$108 million, 25 percent less than the 2007 gross value of \$147 million. According to the California State Board of Equalization, between 2010 and 2015, the total value for Humboldt County's timber harvest has fluctuated between approximately \$68 million and \$71 million, with a high of \$81 million in 2014."

**Comment C7-8:** The commenter objects to the wording of the fourth paragraph on page 3.2-14 of the RDEIR that refers to conversion of timberland.

**Response to Comment C7-8:** The changes to the RDEIR made in response to comments C7-1 through C7-4 are sufficient to address this comment.

**Comment C7-9:** The commenter objects to the wording of the first paragraph on page 3.2-15 of the RDEIR that describes a form of conversion of timberland that is not based on substantial evidence - the change in land management priorities based upon parcel size, market conditions, and ownership values.

**Response to Comment C7-9:** The first and second paragraphs on page 3.2-15 of the RDEIR are revised as follows:

~~“Another type of “conversion” impact to timberland that is more difficult to define and track measure is the change in land management priorities based upon parcel size, market conditions, and ownership values. As parcel sizes go down, the cost of timber harvest per acre (permitting and harvest costs) increases, and timber production may no longer be the most economical use of the property. When this occurs, timberlands become more valuable as rural residential properties. In addition, when houses are placed on timberlands, the value of the structures may be greater than what the standing timber is worth and can price resource land purchasers out of the market.~~

~~Timber production on such parcels may still be viable; 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 may become more complicated with smaller parcel sizes, which in some circumstances may inhibit resource production.”~~

**Comment C7-10:** The commenter objects to the wording of the second paragraph on page 3.2-15 that states in part, “it is unclear what specific effects this trend has had on the timber economy”.

**Response to Comment C7-10:** This comment is addressed by the changes in Response to Comment C7-9.

**Comment C7-11:** The commenter objects to the conclusion in the last paragraph on Page 3.2-15 that parcelization leads to conversion of timberlands. The commenter also reiterates their objection to associating Certificates of Compliance and Lot Line adjustments with conversion of timberlands.

**Response to Comment C7-11:** The last paragraph on page 3.2-15 of the RDEIR is revised as follows: “~~Conversion from Fragmentation.~~ Fragmentation and “parcelization” studies have found that there is a direct positive relationship between timber production volumes and land holding size. As the California Forest Legacy Program Assessment notes:” In response the concern about Certificates of Compliance and Lot Line Adjustments, Response to Comments C7-1 through C7-4 address this concern.

**Comment C7-12:** The commenter states, “In the second paragraph of page 3.2-16 as part of its “parcelization” discussion the RDEIR references a study prepared by the North

Coast Regional Land Trust (NRLT). However, the NRLT study does not utilize the term "parcelization" anywhere in the report. The NRLT report does use the term "subdivision" which is much more narrowly defined. However, the NRLT report fails to provide any data to substantiate that approximately 35,000 acres of forestland was subdivided in Humboldt County, as defined by the Subdivision Map Act. If, in fact, the approximate 35,000 acres simply changed hands as a result of a change in ownership, the report is overreaching and materially misleading in referring to the 35,000 acres as being subdivided.

Furthermore, both the RDEIR and the NRLT report failed to consider the economic effects of variations in log prices and market demand which play a critical role in a landowner's decision to harvest timber.

Any discussion regarding the NRLT report in the RDEIR should be limited to terminology and/or the data utilized in the NRLT report. If in fact the approximate 35,000 acres referenced in the NRLT as being subdivided actually represents a change in ownership, the RDEIR should not rely on the NRLT report and any assumptions in the report regarding decreased timber harvest on these lands should be reconciled with market influences during the limited time period considered in the report."

**Response to Comment C7-12:** The RDEIR on page 3.2.16 is revised as follows, "A study commissioned by the North Coast Regional Land Trust for Humboldt County in 2009 documented ~~the effects of timberland parcelization on annual harvest volumes. The study found~~ that as parcel size went down, the amount and rate of timber harvest went down significantly."

**Comment C7-13:** The commenter states the first sentence, third paragraph of page 3.2-16 misrepresents what a patent parcel is and incorrectly states that the existence of patent parcels affects "fragmentation" of land.

**Response to Comment C7-13:** The RDEIR on page 3.2.16 is revised as follows:

~~"Fragmentation of the forest resource land base in Humboldt County is affected by the existence of patent parcels and strong support for the property rights assumed to be associated with land ownership. A land patent is the right of ownership to a parcel of land granted by government to an individual or private company. The Subdivision Map Act sets out a process that determines whether a patent parcel is considered a separate legal parcel under the law, a process usually culminating in the recordation of a Certificate of Compliance or Conditional Certificate of Compliance."~~

**Comment C7-14:** The commenter states: "In the second paragraph, first two sentences on page 3.2-17 the RDEIR fails to explain that the change in ownership pattern for industrial timberland owners during the period from Page 9 of 56 - GDRCo GPU RDEIR Comments 2001 to 2008 was largely a result of companies closing sawmills due to a lack of timber supply from the US Forest Service. Many of these companies were heavily reliant upon timber from the US Forest Service and when sawmills closed all assets were typically liquated, including timberland holdings."

This information should be revised to further explain or substantiate the change in timberland ownership during this time period.”

**Response to Comment C7-14:** The RDEIR on page 3.2.17 is revised as follows:

“There has also been an overall decrease in acres held by industrial timber owners in the past eight years. During the years of 2001 through 2008, industrial timberland owners transferred approximately 8 percent (51,000 acres) of their total ownership of forest lands for purposes ranging from sales to public agencies (primarily BLM) to rural residential development. Many of the affected companies were heavily reliant upon timber from the US Forest Service and when the supply from the US Forest Service dropped, the sawmills closed, and all assets were typically liquidated, including timberland holdings.”

**Comment C7-15:** The commenter states: “In the second paragraph, last sentence on page 3.2-17, a misleading statement appears regarding the recognition of patent or legal parcels. The recognition of patent or legal parcels (i.e. Certificates of Compliance) does not in and of itself serve as a legal mechanism to break up large ranches and timberland and has no impact on the permitted and/or conditionally permitted uses of land based on zoning classifications.

This information should be revised to state that landowners may elect to sell individual patents or legal parcels upon receipt of a Certificate of Compliance.”

**Response to Comment C7-15:** The RDEIR on page 3.2.17 is revised as follows: “As was stated in the Agricultural Resources section above, the County has experienced a significant increase in the recognition of patent and legal parcels in the resource lands, which ~~can serve as a legal mechanism~~ may lead to break up large ranches and timberland into smaller ownerships because landowners may elect to sell individual patents or legal parcels upon receipt of a Certificate of Compliance. Conversely, Certificates of Compliance can help make commercial timberlands more productive. For example, they can lead to consolidation of timberlands for more efficient timber management.”

**Comment C7-16:** The commenter states: “The Beginning with the fourth paragraph and continuing through the third paragraph on page 3.2-18, the discussion of a previous proposal by MAXXAM Corporation is outdated and irrelevant as it was never a project, never came to fruition and any land use planning based on this artifact is unsupported and entirely speculative. The discussion regarding other land sales and any reference to illegal activities by the sellers or purchasers of property is irrelevant as these are issues related to enforcement and not the current Framework Plan or the proposed General Plan Update.”

**Response to Comment C7-16:** Comment noted. Documentation of the MAXXAM proposal in the setting section of this chapter is appropriate because it was a topic of discussion during the Planning Commission hearings on the GPU. The large-scale subdivision proposed by the Maxxam corporation was a unique and highly speculative proposal, and may not be helpful in developing policy or reviewing applications for

certificates of compliance, determinations of status or lot line adjustments to ensure long-term productivity of timberland in the future.

**Comment C7-17:** The commenter states: "The fourth paragraph on page 3.2-18 contains a false narrative perpetuated throughout Section 3.2 that an individual timberland patent or legal parcel, when sold, is converted and no longer suitable for timber production. ... Therefore, the timber producing capabilities of timberlands are not necessarily lost as a result of the sale of an individual patent or legal parcel and the RDEIR discussion on this point is entirely speculative and unsupported."

**Response to Comment C7-17:** The fourth paragraph on page 3.2-18 is revised as follows, "The protection of forestlands and their timber producing capabilities was one of the key issues during the many public meetings during the General Plan Update process. During those discussions, the timberland stakeholders also noted the timber producing capabilities of timberlands are not necessarily lost as a result of the sale of an individual patent or legal parcel. The main source of controversy identified during this process centers around how the County can ~~protect these resources~~ help ensure efficient long-term productivity of forestlands while balancing the desire of property owners to maintain their economic value ~~through residential development credits on resource lands.~~" The Responses to Comments C7-1 through C7-4 also address Comment C7-17. No further changes to the RDEIR are necessary to respond to this comment.

**Comment C7-18:** The commenter states: "The first paragraph of page 3.2-19 states that the General Plan Update (i.e. the Project) " ... could include new policies which could facilitate conversion of farmland or forest land" is extremely speculative and unsupported. In the context of assessing Impacts and Mitigation Measures, only those policies which are included as part of the General Plan Update as presented in this RDEIR can be considered and/or evaluated. This language should be deleted from the RDEIR."

**Response to Comment C7-18:** This part of the RDEIR is intended to explain that General Plan policies can conceivably include measures that encourage conversion of farmland or forest land. For instance, the General Plan Update could replace policies encouraging continued productivity of commercial timberlands for others that threaten their continued timber production. While this is not the approach of the General Plan Update, it is important for the reader to understand that a General Plan could facilitate conversion of timberland to other uses not involving commercial timber production. The Responses to Comments C7-1 through C7-4 also address Comment C7-18. No further changes to the RDEIR are necessary to respond to this comment.

**Comment C7-19:** The commenter states: "The fourth paragraph, last sentence of page 3.2-19 is misleading in that conversion of timberland does not directly result from the subdivision or the sale of individual patents or legal parcels."

**Response to Comment C7-19:** The RDEIR on page 3.2.19 is revised as follows: "~~Conversion~~ Adverse impacts to resource land can also occur when parcel sizes of resource lands (for both agricultural and timberlands) become too small for economic viability through ~~either subdivisions or the break-up of ranches and timber holdings from~~

the sell-off of patent and/or legal parcels (primarily substandard parcels) and subsequent development of the property for other uses.”

**Comment C7-20:** The commenter notes that, “Under the heading “Trinidad Planning Watershed, Changes from T” on page 3.2-32, the 42 acres referenced as being east of Big lagoon is believed to be GDRCo property for Page 11 of 56 - GDRCo GPU RDEIR Comments which GDRCo submitted a change in land use designation. GDRCo had initially made a request to have the land use designation changed from T to RE so that the land use would conform with what was an existing residential use. GDRCo no longer provides residential use of this approximately 42-acre property and subsequently requested that the land use be changed from T to CR...”

**Response to Comment C7-20:** The RDEIR on page 3.2.32 is revised as follows: “Approximately 42 acres proposed to be changed to ~~RE~~ CR are located on the east side of Big Lagoon. Approximately ~~and another~~ 172 acres are located east of Trinidad along Stumptown Road, Westhaven Drive, and Adams Foxfarm Road are proposed to be changed to RE.”

**Comment C7-21:** The commenter states that, “The last paragraph of page 3.2-34 contains the title “Conversion as a result of increased parcelization and subsequent development” which is materially misleading and unsubstantiated by the subsequent content.”

**Response to Comment C7-21:** The heading of the last paragraph of page 3.2-34 is revised as follows: “~~Conversion as a result of increased p~~Parcelization and subsequent development”.

**Comment C7-22:** The commenter states in the first paragraph on page 3.2-35 the County insinuates that the “compliance with the Subdivision Map Act is somehow being avoided through the recognition, sale or purchase of patents and/or legal parcels.”

**Response to Comment C7-22:** The RDEIR first paragraph on page 3.2-35 is deleted as follows, “~~The County has witnessed the increased use of recognizing legal parcels, in particular land patents, on resource lands as a tool to break up and sell off smaller parcels independently of the Subdivision Map Act procedures that would typically ensure conformity with the General Plan.~~”

**Comment C7-23:** The commenter believes the discussion in the second paragraph on page 3.2-35 regarding patent parcels is both speculative and subjective, and suggests a revision to the last sentence to “specify that any unaltered or altered patent parcel found to be in conformance with the Subdivision Map Act Determination of Status process would retain its historic rights.”

**Response to Comment C7-23:** The RDEIR first paragraph on page 3.2-35 is revised as follows, “Although a complete review has not been conducted on these patent parcels, many of these retain their historic rights. Patent parcels that have been altered through subdivision, merger or lot line adjustment may also be recognized as legally



separate parcels if found to be created in conformance with the Subdivision Map Act through a Determination of Status process."

**Comment C7-24:** The commenter states "discussion in the third paragraph on page 3.2-35 comingles the Determination of Status process (i.e. Certificates of Compliance) and development criteria which are not mutually exclusive... The information provided in this paragraph should be revised to clearly state that the Determination of Status process is not contingent upon development criteria."

**Response to Comment C7-24:** The third paragraph on page 3.2-35 of the RDEIR is revised as follows: "Because the Determination of Status process is not contingent upon development criteria, often, these parcels do may not conform to the prescribed density range as designated in the General Plan, and they are not developed with the same infrastructure as. Development criteria (e.g., adequate roads, water availability, wastewater capabilities, and natural hazards) may or may not be taken into consideration in determining whether the parcel must be recognized. so full build out of patent parcels may jeopardize compromise the open space and resource values of the land. Given the projected low housing demand, this is not expected to be a significant concern during the timeframe of the GPU."

**Comment C7-25:** The commenter states, "the first paragraph under 'Other changes that could result in Conversion of Farmland or Forestland' on page 3.2-35 and discussion regarding conversion as used in the subsection title should be limited to the definition of Timberland Conversion as provided in the Forest Practice Act (Title 14, Article 7)."

**Response to Comment C7-25:** There are other forms of timberland conversion that do not appear in the definition of Timberland Conversion in the Forest Practice Act<sup>2</sup>, so it is not appropriate to limit the use of the term as suggested in this comment. As noted in response to some of the previous comments, the term "impacts to timberland" is better suited and has been substituted for the term "conversion". The changes to the RDEIR made in response to comments C7-1 through C7-4 also address this comment. No other changes to the RDEIR are needed to respond to this comment.

**Comment C7-26:** The commenter states, "The third paragraph, first sentence of page 3.2-36 contains a general statement without sufficient facts to support the conclusion. Conflicts may occur however it must be recognized that timber harvesting is a relatively short-lived event with short term disruptions as compared to ongoing timber management activities and, as the 2003 FRAP Forest and Range 2003 Resource Report and updates clearly recognize, any "conflicts" greatly diminish on parcels in excess of 20 acres in size. Again the use of the term conversion should be limited to the definition of Timberland Conversion as provided in the Forest Practice Act (Title 14, Article 7).

<sup>2</sup> "Timberland Conversion" is defined in as :(1) Within non-Timberland Production Zone (TPZ) timberland, transforming timberland to a non-timber growing use through timber operations where:

- (A) Future timber harvests will be prevented or infeasible because of land occupancy and activities thereon; or
- (B) Stocking requirements of the applicable district forest practice rules will not be met within five years after completion of timber operations; or
- (C) There is a clear intent to divide timberland into ownerships of less than three acres.

**Response to Comment C7-26:** The third paragraph, first sentence of page 3.2-36 of the RDEIR is revised as follows, "Conflicts between timber operations and surrounding residential land uses (most often, residences) often occur, and can cause a disruption in harvest and ultimate can make commercial timber operations more difficult and expensive conversion of timberlands to other uses."

**Comment C7-27:** The commenter states, "The third paragraph, third sentence of page 3.2-36 should be changed as follows: the term 'limiting incompatible uses' should be further clarified to state 'limiting incompatible uses consistent with Government Code 51100-51104'."

**Response to Comment C7-27:** Government Code 51100-51104 describes the uses that are compatible with timber production in areas zoned TPZ - Timber Production Zone. Since some areas with a General Plan Land Use designation of "T – Timber Production" in the County are not zoned TPZ, this section of the Government Code does not apply in some areas assessed in the RDEIR, so it would be inaccurate to make the requested change. No changes to the RDEIR are needed to respond to this comment.

**Comment C7-28:** The commenter states, "The sixth paragraph, first sentence on page 3.2-39, regarding the use of the term "parcelization", is again misleading. Neither the RDEIR nor the Board of Supervisors' approved draft General Plan Update provides any definition for "parcelization". If the term, as used in the first sentence of the sixth paragraph on page 3.2-39 of the RDEIR assumes that a Certificate of Compliance constitutes parcelization, then this is a false and misleading statement and should be revised accordingly. Likewise, every conveyance of land constitutes a "parcelization" to some extent-the purpose of the EI R is analyze detrimental environmental effects, without evaluating parcel size relative to any discussion of "parcelization" and/or "fragmentation" renders the entire narrative vague and unsupported.

**Response to Comment C7-28:** The sixth paragraph, first sentence on page 3.2-39 of the RDEIR is revised as follows: "The Plan also does not fully protect against the loss of timber lands from increased parcelization on parcels that are too small to be economically viable for timber production on their own. Current County Code contains a Merger Ordinance that directs the County to merge substandard parcels zoned TPZ into those that meet density requirements; however, this ordinance was never fully implemented. The proposed Plan recommends revising this section of the code to remove the merger requirement because it was not implemented. On parcels that are too small to be economically viable for timber production on their own, [this will allow may lead to a higher density of development on lands planned T and cause conversion of resulting in land use changes from timberlands to rural residential, illicit cannabis cultivation or other non-timber uses. Therefore, the This potential loss of timber lands cannot be mitigated to a level of insignificance once these lands they are converted to a non-timber land use, and therefore is a significant unavoidable impact of the General Plan Update."

**Comment C7-29:** The In the sixth paragraph, starting with the third sentence on page 3.2-39 and continuing onto page 3.2-40, the discussion assumes that the non-implementation of the Merger Ordinance will cause the "conversion" or "loss" of

timberlands to rural residential uses. This assumption is entirely unsupported and the narrative in the RDEIR lacks context. Again, the 2003 FRAP Forest and Range 2003 Resource Report does provide context in this regard (i.e., recognizing density at less than 20 acres to cause fragmentation concerns), but the RDEIR makes no effort to define "parcelization" or "fragmentation" in a meaningful, substantive manner. The narrative is vague, unsupported and should be stricken... The fourth sentence of the sixth paragraph on page 3.2-39 should be deleted as it is not adequately substantiated.

**Response to Comment C7-29:** As explained in Response to Comment 28, the RDEIR is being revised to clarify the impact of the General Plan being considered in the RDEIR involves the conversion of parcels that are too small to be economically viable for timber production, such as those that could be developed at a density of less than 20 acres, as recognized in the 2003 FRAP Forest Resource and Range Report cited by the commenter. No further modifications to the RDEIR are necessary to respond to this comment.

**Comment C7-30:** The commenter states, "The first paragraph on page 3.2-40 contains information that is misleading because the term "conversion" infers that the timber growing capacity of resource production lands is lost if used in conjunction with rural residential purposes. This gross generalization gives no consideration to parcel size and fails to recognize that these parcels likely retain the land use and zoning that support resource production and can provide ecological benefits as well, as expressly concluded in the 2003 FRAP Forest and Range 2003 Resource Report for parcels 20 acres or greater... The finding provided here that there is a significant unavoidable impact is unsubstantiated and inaccurate if the County presumes (as the RDEIR text implies) that "conversion" occurs as a result of either the sale of individual patents/legal parcels or the residential use of timber resource lands. This implicit finding relies upon a false narrative without any context and should be re-evaluated by limiting the use of the term "conversion" in a manner that is consistent with the Forest Practice Act."

**Response to Comment C7-30:** The first paragraph on page 3.2-40 of the RDEIR is revised as follows: "The Plan also does not fully protect against the loss of resource production lands from conversion to rural residential or other non-timber uses. Limiting housing on lands-parcels that are too small to be economically viable for timber production on their own which are presently managed for as industrial timberlands may help prevent the conversion of these resource production lands to other uses, but this policy option is not considered feasible because it could significantly diminish the economic value of those lands. Therefore, the This potential loss of timber lands on parcels that are too small to be economically viable for timber production on their own (for example, some parcels less than 20 acres in size) which are presently managed as industrial timberlands cannot be mitigated to a level of insignificance once these lands are converted to a non-timber land use, and therefore, is a significant unavoidable impact of the General Plan Update."

**Comment C7-31:** The commenter suggests the fourth paragraph, first sentence; T as used at the end of this sentence should be revised to be TPZ.

**Response to Comment C7-31:** The fourth paragraph, first sentence on page 3.2-40 of the RDEIR is revised as follows, "The General Plan Update land use map maintains existing or equivalent agricultural or timber production land use designations for lands under Williamson Act Contract or lands zoned TPZ."

**Comment C7-32:** The commenter states, "Mitigation 3.3.3.2.a.; It should be recognized that the mitigation proposed is an onerous undertaking and it is likely unrealistic that such an evaluation could be completed within a two-year timeframe. The County, under current State regulations, is required to evaluate critical watersheds."

If Mitigation 3.3.3.2.a. is adopted the sole cost of completing said evaluation should be the responsibility of the County, not individual project applicants, and any failure on the part of the County to complete the evaluation within the specified two-year timeframe should not result in a de facto moratorium on development or any other project in a given watershed."

**Response to Comment C7-32:** Mitigation 3.3.3.2.a. is revised as follows:

"WR-IMx. Water Supply Evaluation and Monitoring. Conduct watershed level evaluations within two years after the adoption of the General Plan Update to ~~determine the~~ ensure sufficient long term surface and groundwater supply, including seasonal, average, dry year, and multiple dry year supplies, and beneficial uses of water ~~to determine an estimate of the quantity of water will be~~ available for the level of future development described in the Revised Draft EIR for the GPU. Work with water and wastewater related special districts, regulators, and other appropriate organizations to monitor watershed conditions."

**Comment C7-33:** The commenter states, "Impact 3.11.3.5. Habitat Conservation Plans; suggest the first sentence under this subchapter be revised as follows:

'Implementation of the General Plan Update could result in additional development that conflicts with adopted habitat conservation plans'.

This suggested change is relevant considering that an HCP may provide for limited land use changes and therefore be an absolute conflict.

**Response to Comment C7-33:** Page 3.11-17 of the RDEIR is revised as follows:

"Implementation of the General Plan Update ~~would~~ could result in additional development that conflicts with adopted habitat conservation plans."

**Comment C7-34:** The commenter states, "First paragraph, beginning with the fourth sentence; the information provided in the RDEIR herein is misleading and hyperbolic."

As stated in Chapter 2 of the RDEIR, 'The RDEIR is focused on the environmental effects which may reasonably be expected to occur during the 24-year planning period of the GPU, 2016-2024, as described in subchapters 2.1 and 2.5 below'. Table 2.5-1 on page 2-24 of the RDEIR provides the estimated number of dwelling units by land use designation that will be required to accommodate the estimated maximum feasible housing development and potential and projected development from 2016 to 2040. For lands

planned Tor TC the estimate provided is 44 housing units assuming that peak demand occurs in 2028. The discussion provided on page 3.11-17, under 'Analysis of Relevant General Plan Update Policies', should be limited to the scope of the Project as described in the RDEIR. The discussion which refers to the theoretical construction of as many as "20,000 dwelling units" on lands planned Timberlands (T) is completely hyperbolic and irrelevant as the analysis of relevant General Plan Update policies related to land planned T. Specifically, in order to maintain internal consistency, the number of dwelling units on lands zoned T considered in the RDEIR should be limited to the estimated 44 units as identified in the RDEIR. The "20,000" unit assumption is entirely misplaced and without support. Furthermore, the presumption, as framed, violates accepted EIR scoping and project description standards under CEQA. (See legal opinion appended as Attachment B).

The discussion provided under Analysis of Relevant General Plan Update Policies regarding the planned densities and theoretical maximum buildout of lands planned T to "20,000 units" should be removed as it is outside the scope of the Project as described in the RDEIR and it is not substantiated by any analysis elsewhere in the RDEIR."

**Response to Comment C7-34:** The fourth and fifth sentences of the first paragraph on Page 3.11-18 of the RDEIR are revised as follows: "Under the proposed General Plan Update, residential uses are planned at densities of 40 to 160 acres per dwelling unit on lands planned T or TC, which are the areas covered by the HCP's. At maximum buildout, this could theoretically result in the construction of as many as 20,000 The Estimated Maximum Development Potential shown in Table 2.5-1 of this RDEIR is 7,814 housing units on the 900,000 acres of planned timberlands, although historical growth trends and Department of Finance projections would indicate that only limited demand for possible development is likely to exist 44 housing units are likely to be developed in these areas during the 2016 - 2040 timeframe. Housing construction was not an issue that was considered or addressed by the HCPs indicated above.

Letter C8 Steven S. Madrone

To: Planning Director and Humboldt County Board of Supervisors  
From: Stephen Sungnome Madrone, Parcel #515-291-12  
Date: 6-30-17  
RE: Public Comment on Draft EIR on GPU

Dear Director, Chair and members of the Board:

I have several comments.

The county has illegally recommended a GP Designation of RA 5-20 for parcels 515-291-047, 515-291-048, 515-291-049, and 515-291-050. The zoning for these parcels is 20 acre AE. The current GP designation is 1 acre dispersed housing, but that is old and from the 1970's. The new recommendation from the Planning Commission in 2014 was 20-acre minimums but the Board of Supervisors changed this at its June 25<sup>th</sup>, 2015 public hearing.

This public hearing notified parcel owners of any changes proposed for their zoning and it gave adjacent parcel owners a chance to offer public comment. What the public was not notified of was the fact that at this June 25<sup>th</sup> hearing changes were made in the GP Designation for these 4 parcels listed above.

Without any public notice of a possible change, The Board of Supervisors (BOS) agreed to re-designate these parcels as 5-20 acre minimums. There was opposition to this from the City of Trinidad, and several local residents, but the BOS overruled that input from a Referral Agency (the City). When the BOS Chair asked the County Planner why the Planning Commission had recommended such low densities, the planner said it was because of water supply and fisheries issues and that "there were no overriding considerations for recommending higher densities". The BOS then proceeded to approve higher densities simply by asking the BOS rep from that district what his preference was. Supervisor Sundberg recommended higher densities without stating any "overriding considerations". This is illegal and a violation of CEQA.

The EIR should stay with the earlier planning commission recommendation of 20-80 acre minimums. The reasons for this are well documented in the files for the subdivision of these parcels as part of the Moss Minor Subdivision.

Please change these designations.

Thank you for this opportunity to comment.

Sincerely,

Stephen. S. Madrone  
1521 Fox Farm Road  
Trinidad, Ca. 95570

C8-1

**Response to Steven S. Madrone - Letter C8**

**Comment C8-1:** The commenter objects to the land use designations tentatively approved by the Board of Supervisors on a set of parcels in the Foxfarm Road neighborhood in Westhaven, and requests the land use designations recommended by the Planning Commission for these properties be applied instead.

**Response to Comment C8-1:** Comment noted. The land use designation tentatively approved by the Board of Supervisors will result in lower densities than what is currently allowed by the General Plan, and it is consistent with the existing zoning that applies to the property. The comment does not address the RDEIR text. No changes to the RDEIR are needed to respond to this comment.

## Chapter 3. RDEIR Text Changes

### Chapter 3.2 Agricultural and Timber Resources

Page 3.2-11 of the RDEIR is revised as follows:

"A study of the County's agricultural and timberland conversions identified substantial amounts of land potentially lost to production through zone reclassifications, subdivisions, and conditionally permitted uses that conflict with agricultural and timber operations (Humboldt County Forest Resources and Policy Report, October 2003, updated in 2008). In addition to conversion occurring because of General Plan amendments and new subdivisions, resource lands may be ~~converted~~ impacted through a combination of 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 and other actions such as subdivisions or issuance of timberland conversion permits. Approximately 25 percent of all the Certificate of Compliance applications submitted from 1985 - 2000 occurred on agricultural properties and timberlands, affecting more than 18,000 acres. From 2001 to June 2005, this rate increased from 25 percent to over 67 percent, affecting over 53,000 acres. While some of those actions were precursors to conversion of timberland to other uses, most notably illicit cannabis cultivation, others provided for more efficient timber management."

Page 3.2-11 of the RDEIR is revised as follows:

"These changes in land use as a result of zone reclassifications, and subdivisions, ~~and the issuances of Certificates of Compliance on historic parcels,~~ are primarily reflective of the breakup of old family ranches."

Page 3.2-12 of the RDEIR is revised as follows:

"County parks and community parks account for ~~1,000~~ approximately 2,000 acres."

Page 3.2-12 of the RDEIR is revised as follows:

"However, the County's timber industry has been in decline over the past 30 years. In 2000, the County's total gross value of timber production was \$285,232,953, for which Humboldt County ranked first in the state. By 2008, the total gross value of timber dropped to \$108 million, 25 percent less than the 2007 gross value of \$147 million. According to the California State Board of Equalization, between 2010 and 2015, the total value for Humboldt County's timber harvest has fluctuated between approximately \$68 million and \$71 million, with a high of \$81 million in 2014."

Page 3.2-15 of the RDEIR is revised as follows:

"Another ~~type of "conversion"~~ impact to timberland that is more difficult to define and ~~track~~ measure is the change in land management priorities based upon parcel size, market conditions, and ownership values. ~~As parcel sizes go down, the cost of~~



~~timber harvest per acre (permitting and harvest costs) increases, and timber production may no longer be the most economical use of the property. When this occurs, timberlands become more valuable as rural residential properties. In addition, when houses are placed on timberlands, the value of the structures may be greater than what the standing timber is worth and can price resource land purchasers out of the market.~~

~~Timber production on such parcels may still be viable; 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 may become more complicated with smaller parcel sizes, which in some circumstances may inhibit resource production."~~

Page 3.2-15 of the RDEIR is revised as follows:

**"Conversion from Fragmentation.** Fragmentation and "parcelization" studies have found that there is a direct positive relationship between timber production volumes and land holding size. As the California Forest Legacy Program Assessment notes:"

Page 3.2-16 of the RDEIR is revised as follows:

~~"A study commissioned by the North Coast Regional Land Trust for Humboldt County in 2009 documented the effects of timberland parcelization on annual harvest volumes. The study found that as parcel size went down, the amount and rate of timber harvest went down significantly."~~

Page 3.2-16 of the RDEIR is revised as follows:

~~"Fragmentation of the forest resource land base in Humboldt County is affected by the existence of patent parcels and strong support for the property rights assumed to be associated with land ownership. A land patent is the right of ownership to a parcel of land granted by government to an individual or private company. The Subdivision Map Act sets out a process that determines whether a patent parcel is considered a separate legal parcel under the law, a process usually culminating in the recordation of a Certificate of Compliance or Conditional Certificate of Compliance."~~

Page 3.2-17 of the RDEIR is revised as follows:

~~"There has also been an overall decrease in acres held by industrial timber owners in the past eight years. During the years of 2001 through 2008, industrial timberland owners transferred approximately 8 percent (51,000 acres) of their total ownership of forest lands for purposes ranging from sales to public agencies (primarily BLM) to rural residential development. Many of the affected companies were heavily reliant upon timber from the US Forest Service and when the supply from the US Forest Service dropped, the sawmills closed, and all assets were typically liquated, including timberland holdings."~~

Page 3.2-17 of the RDEIR is revised as follows:

~~"As was stated in the Agricultural Resources section above, the County has experienced a significant increase in the recognition of patent and legal parcels in~~

the resource lands, which ~~can serve as a legal mechanism~~ may lead to break up large ranches and timberland into smaller ownerships because landowners may elect to sell individual patents or legal parcels upon receipt of a Certificate of Compliance. Conversely, Certificates of Compliance can help make commercial timberlands more productive. For example, they can lead to consolidation of timberlands for more efficient timber management."

The fourth paragraph on page 3.2-18 of the RDEIR is revised as follows,

"The protection of forestlands and their timber producing capabilities was one of the key issues during the many public meetings during the General Plan Update process. During those discussions, the timberland stakeholders also noted the timber producing capabilities of timberlands are not necessarily lost as a result of the sale of an individual patent or legal parcel. The main source of controversy identified during this process centers around how the County can ~~protect these resources~~ help ensure efficient long-term productivity of forestlands while balancing the desire of property owners to maintain their economic value through residential development credits on resource lands."

Page 3.2-19 of the RDEIR is revised as follows:

"~~Conversion~~ Adverse impacts to resource land can also occur when parcel sizes of resource lands (for both agricultural and timberlands) become too small for economic viability through either subdivisions or the break-up of ranches and timber holdings from the sell-off of patent and/or legal parcels (primarily substandard parcels) and subsequent development of the property for other uses."

Page 3.2-21 of the RDEIR is revised as follows:

**Table 3.2-3. Countywide Resource Land.**

Land Use Designation	Framework General Plan		Proposed General Plan Update	
	Acres	Max Buildout (Units)	Acres	Max Buildout (Units)
T	<del>899,717</del> 899,700	<del>19,876</del> 19,892	<del>897,026</del> 893,840	19,398
AE	<del>59,465</del> 59,464	1,925	<del>76,311</del> 113,608	<del>2,181</del> 2,179
AG	<del>409,722</del> 409,720	18,041	<del>377,838</del> 381,846	17,201
<b>Total</b>	<del>1,368,904</del> <b>1,368,884</b>	<del>39,842</del> <b>39,858</b>	<del>1,351,175</del> <b>1,389,294</b>	<del>38,780</del> <b>38,778</b>

Page 3.2-32 of the RDEIR is revised as follows:

"Approximately 42 acres proposed to be changed to RE CR are located on the east side of Big Lagoon. Approximately ~~and another~~ 172 acres are

located east of Trinidad along Stumptown Road, Westhaven Drive, and Adams Foxfarm Road are proposed to be changed to RE."

The heading of the last paragraph of page 3.2-34 is revised as follows:

~~"Conversion as a result of increased p~~Parcelization and subsequent development".

The RDEIR first paragraph on page 3.2-35 is deleted as follows,

~~"The County has witnessed the increased use of recognizing legal parcels, in particular land patents, on resource lands as a tool to break up and sell off smaller parcels independently of the Subdivision Map Act procedures that would typically ensure conformity with the General Plan."~~

Page 3.2-35 of the RDEIR is revised as follows:

~~"Although a complete review has not been conducted on these patent parcels, many of these retain their historic rights. Patent parcels that have been altered through subdivision, merger or lot line adjustment may also be recognized as legally separate parcels if found to be created in conformance with the Subdivision Map Act through a Determination of Status process."~~

Page 3.2-35 of the RDEIR is revised as follows:

~~"Because the Determination of Status process is not contingent upon development criteria, Often, these parcels do may not conform to the prescribed density range as designated in the General Plan, and they are not developed with the same infrastructure as. Development criteria (e.g., adequate roads, water availability, wastewater capabilities, and natural hazards) may or may not be taken into consideration in determining whether the parcel must be recognized. so full build out of patent parcels may jeopardize the open space and resource values of the land. Given the projected low housing demand, this is not expected to be a significant concern during the timeframe of the GPU."~~

Page 3.2-36 of the RDEIR is revised as follows:

~~"Conflicts between timber operations and surrounding residential land uses (most often, residences) often occur, and can cause a disruption in harvest and ultimate can make timber operations more difficult and expensive conversion of timberlands to other uses."~~

Page 3.2-39 of the RDEIR is revised as follows:

~~"The Plan also does not fully protect against the loss of timber lands from increased parcelization on parcels that are too small to be economically viable for timber production on their own. Current County Code contains a Merger Ordinance that directs the County to merge substandard parcels zoned TPZ into those that meet density requirements; however, this ordinance was never fully implemented. The proposed Plan recommends revising this section of the code to remove the merger requirement because it was not implemented. On parcels that are too small to be economically viable for timber production on their own, this will allow may lead to a higher density of development on lands planned T and cause conversion of~~

resulting in land use changes from timberlands to rural residential, illicit cannabis cultivation or other non-timber uses. ~~Therefore, the~~ This potential loss of timber lands cannot be mitigated to a level of insignificance once these lands they are converted to a non-timber land use, and therefore **is a significant unavoidable impact** of the General Plan Update."

Page 3.2-40 of the RDEIR is revised as follows:

"The Plan also does not fully protect against the loss of resource production lands from conversion to rural residential or other non-timber uses. Limiting housing on ~~lands parcels that are too small to be economically viable for timber production on their own which are presently managed for~~ as industrial timberlands may help prevent the conversion of these resource production lands to other uses, but this policy option is not considered feasible because it could significantly diminish the economic value of those lands. ~~Therefore, the~~ This potential loss of timber lands on parcels that are too small to be economically viable for timber production on their own (for example, some parcels less than 20 acres in size) which are presently managed as industrial timberlands cannot be mitigated to a level of insignificance once these lands are converted to a non-timber land use, and therefore, **is a significant unavoidable impact** of the General Plan Update."

Page 3.2-40 of the RDEIR is revised as follows:

"The General Plan Update land use map maintains existing or equivalent agricultural or timber production land use designations for lands under Williamson Act Contract or lands zoned TPZ."

## Chapter 3.3 Utilities and Service Systems

Page 3.3-55 of the RDEIR is revised as follows:

WR-IMx. Water Supply Evaluation and Monitoring. Conduct watershed level evaluations within two years after the adoption of the General Plan Update to ~~determine the~~ ensure sufficient long term surface and groundwater supply, including seasonal, average, dry year, and multiple dry year supplies, and beneficial uses of water to determine an estimate of the quantity of water will be available for the level of future development described in the Revised Draft EIR for the GPU. Work with water and wastewater related special districts, regulators, and other appropriate organizations to monitor watershed conditions.

## Chapter 3.5 Transportation

Page 3.5-4 of the RDEIR is revised as follows:

- S.R. 211 is a short two-lane highway that extends from U.S. 101 to the City of Ferndale, crossing historic Fernbridge over the Eel River ~~over historic Fernbridge.~~

Page 3.5-5 of the RDEIR is revised as follows:

"In addition, Humboldt County has identified the following roads as Regionally Significant Streets and Roadways as part of the ~~2008~~2014 Regional Transportation Plan (see HCAOG 20-Year Humboldt County Regional Transportation Plan, 2014, 2008 Table HR Streets-1 Regionally, Significant Roadways and the discussion on ~~page HR 1~~ of the "Existing Roadway System" from page 24 to 28):"

Page 3.5-6 of the RDEIR is revised as follows:

**Redwood Transit System.** The Redwood Transit System (RTS) consists of "mainline" commuter service along the U.S. 101 corridor from Scotia to Trinidad. Regular commute service is available to McKinleyville, as well as regional service to the California Redwood Coast – Humboldt County Airport. Although some trips serve the entire corridor, most trips provide service only along shorter sections of the route. Service was recently added to southern Humboldt, now connecting Garberville, Redway, Phillipsville, Miranda, Myers Flat, and Weott with the Humboldt Bay area. In addition to the mainline route serving U.S. 101, ~~a separate route~~ Tish Non-Village service provides service between Willow Creek and various locations in Arcata and McKinleyville.

and...

**Fortuna Transit.** The City of Fortuna operates Fortuna Transit, which provides transportation within the City limits to seniors or persons with a disability.

Page 3.5-7 of the RDEIR is revised as follows:

"Pedestrian facilities, primarily sidewalks and crosswalks, are also most commonly provided in the urban areas. Most pedestrian facilities were constructed prior to the American with Disabilities Act (ADA) and are therefore not compliant. Compliance issues include inadequate sidewalk width, excessive cross-slope, inadequate curb ramps at intersections, and obstacles in the sidewalk. Such obstructions and impediments can force pedestrians on foot or those who use wheelchairs onto road shoulders, and into parking and bike lanes. Over time, the County Department of Public Works is upgrading pedestrian facilities to be ADA compliant."

Page 3.5-7 of the RDEIR is revised as follows:

"Rural areas and small communities do not often have pedestrian facilities that are separated from the roadway. Pedestrians and bicyclists frequently utilize roads in Humboldt County that lack sidewalks and/or bicycle lanes. As a result, sharing of roadways by pedestrians, car and truck drivers, bicyclists, and even equestrians, is common in many rural areas. While equine use does not constitute a ~~significant~~ detectable portion of daily commuter travel in Humboldt County, equestrian trails can be a significant recreational resource. A number of community and public land trail systems provide transportation and recreation opportunities; however, most of the facilities dedicated exclusively for non-motorized use are provided only in urban areas of the County."

Page 3.5-8 of the RDEIR is revised as follows:

“Pedestrian facilities are most commonly found in the County’s seven cities and larger unincorporated communities. Sidewalks and pathways of varying width are found in commercial areas, residential neighborhoods, and near schools. In many cases, existing sidewalks meet only the minimum ADA standards and often are obstructed by utility poles, signposts, and other obstacles. There are also sidewalk gaps, uncontrolled intersections, and street crossings that pose pedestrian travel impediments, especially to the mobility-impaired.

Most facilities dedicated for bicycle use are in the urban and suburban areas of the County, with bicycle lanes in place in Eureka, Arcata, McKinleyville and Fortuna. The City of Arcata provides the most interconnected system of bicycle lanes/routes that facilitates access to and from a number of trip-generating areas. In Eureka, the bike lane/route system includes both north-south and east-west lanes; however, not all trip generating areas are connected. Fortuna has limited systems of bike lanes and designated routes. “

Page 3.5-8 of the RDEIR is revised as follows:

“The Elk River Hikshari’ Trail ~~is~~ a multiple-use, paved trail that runs between Truesdale Avenue (just south of the Bayshore Mall) 1.5 miles south to the Pound Road Park & Ride lot, off the Herrick Avenue and Highway 101 interchange.”

Page 3.5-8 of the RDEIR is revised as follows:

“In conjunction with other cities and counties across the nation, Humboldt County is was the lead agency in a funding proposal to the federal government in 2009, called the Humboldt People Powered Pathways (HP3) funding proposal to the federal government. The HP3 proposal seeks sought transportation funding to implement local jurisdiction’s plans for improving active transport systems and programs as part of 2010 Campaign for Active Transportation. The Campaign for Active Transportation was a national effort aimed at the inclusion of a program that provides funding for non-motorized systems (vs. singular projects) as a permanent program in the federal transportation legislation reauthorization. The HP3 plan identified approximately 25 active transport planning, implementation programs, and partnerships that identify related to approximately \$50 million of non-motorized transportation projects located across the County. Although the HP3 funding proposal was unsuccessful, a number of the individual projects included in the proposal have since been funded and the interagency coordination to improve active transport systems and programs continues.”

Page 3.5-9 of the RDEIR is revised as follows:

“Caltrans has completed a Final EIR (SCH # 2009012070) and Addendum to the EIR, a Finding of no Significant Impact, and a Notice of Determination in May 2017 (see project web page at [http://www.dot.ca.gov/dist1/d1/projects/richardson\\_grove/](http://www.dot.ca.gov/dist1/d1/projects/richardson_grove/)) for a project to provide access for larger trucks on U.S. 101 through Richardson Grove State Park near the Humboldt County line. The proposed project extends from post mile (Humboldt) 1.1 to post mile (Humboldt) 2.2 and would include minor realignments and widening of the existing roadway, culvert improvements, and

repaving the roadway. This project has been controversial because it involves road improvements and the removal of trees within a State Park as well as concerns regarding growth inducing impacts.”

Page 3.5-10 of the RDEIR is revised as follows:

“Air travel is a growing transportation option in Humboldt County with passenger enplanements at California Redwood Coast – Humboldt County, the only airport in the County with scheduled passenger flights, and passenger enplanements are expected to increase from 98,453 in 2004 to 167,000 in 2024 (Arcata-Eureka Airport Master Plan Report, Chapter 2, Airport Role and Activity Forecasts). Several daily flights are provided, connecting Humboldt County with San Francisco and Portland, Oregon. The airport continues to work to add more flights to more destinations.”

Page 3.5-11 of the RDEIR is revised as follows:

Annual maintenance dredging of Humboldt Bay is vital to maintaining safe and navigable access. Federal channels in Humboldt Bay are dredged by the U.S. Army Corps of Engineers. Any other area that requires dredging is the responsibility of local governments; in this area ~~that is the Harbor District~~ is that agency.

Page 3.5-12 of the RDEIR is revised as follows:

“The operation of agricultural vehicles on roadways may also affect traffic on rural roadways in the unincorporated area. Agricultural activities are an important element of the local economy and agricultural vehicles operate regularly on County roadways. Agricultural vehicles are slow moving vehicles and considered incompatible with other motorists. ~~Implementation of the proposed General Plan Update would increase~~ in the amount of traffic on roadways and could increase the potential for conflict with agricultural vehicles.”

Page 3.5-12 of the RDEIR is revised as follows:

“Another factor that can impact roadway safety is the incompatibility of some unincorporated area roadway and highway facilities with multi-modal transportation uses. Many existing roadways and intersections in the County do not contain pedestrian or bicycle facilities. Humboldt County Transportation-Disadvantaged Populations Report, 2006,” (<http://www.naturalresourceservices.org/TDP.html> [http://www.nrscaa.org/path/pdfs/HumCoTDPRreport5\\_06.pdf](http://www.nrscaa.org/path/pdfs/HumCoTDPRreport5_06.pdf)) found that ~~p~~ Pedestrian and bicycle safety is generally poor in Humboldt County ~~when~~ compared to other rural counties. There are substantially higher bicycle injuries and fatality rates in Humboldt County than all other rural areas in California. Bicycle injury and fatality rates are also significantly higher than the state average, particularly for ~~youth and the ages 05 five to–24 age groups~~. In spite of this, bicycle and pedestrian injuries and fatalities are decreasing in Humboldt County.”

Page 3.5-13 of the RDEIR is revised as follows:

“The traffic impacts resulting from General Plan Update land uses were evaluated by TJKM Transportation Consultants using the latest Humboldt County Travel Demand Model. The Humboldt County Travel Demand Model was updated in 2013

by the Humboldt County Association of Governments (HCAOG) and the California Department of Transportation (Caltrans) to forecast travel patterns in both rural and urbanized portions of Humboldt County. The main purposes of the Humboldt County Travel Demand Model are to support the Regional transportation planning process<sup>1</sup>, to evaluate potential improvements to the roadway system, and evaluate the impacts of land use changes in the County. The model also includes limited transit and non-motorized analysis capabilities. The base year for the model is 2010, with a forecast year of 2040."

Page 3.5-14 of the RDEIR is revised as follows:

"The transportation analysis zones cover the entire County and each city, and include contain data representing existing and projected future population and employment levels."

Page 3.5-14 of the RDEIR is revised as follows:

"Consequently, an interim year (2028) scenario was developed using the 2028 population from the DOF and 2028 employment from Caltrans 2015 Economics Forecasts, and analyzed as a worse-case scenario."

Page 3.5-15 of the RDEIR is revised as follows:

"As shown, the forecast 18-year and 30-year growth in both households and employment is relatively modest."

Page 3.5-18 of the RDEIR is revised as follows:

"There are no ~~are no~~ adopted plans, ordinances or policies establishing measures of effectiveness for the performance of the circulation system in Humboldt County."

Pages 3.5-18 and 3.5-19 of the RDEIR are revised to add quotes as follows:

"The Eureka Community Plan contains a general goal that does not include an MOE: Policy 4220.1, 'the County shall strive to maintain a Level of Service of C or better on arterials in the Planning Area. The acceptable level of service goal will be consistent with the financial resources available and the limits of technical feasibility.'

Page 3.5-19 of the RDEIR is revised as follows:

"Due to already established auto-oriented land use patterns, the private automobile would likely continue to be the dominant mode of transport in Humboldt County. The General Plan Update seeks to reduce vehicle miles traveled per person by considering the needs of motorized vehicles, public transit, bicyclists, and pedestrians during land use and transportation planning and by providing balanced transportation opportunities, ~~whereby the needs of motorized vehicles, public transit, bicyclists, and pedestrians are considered during land use and transportation planning.~~"



Page 3.5-19 of the RDEIR is revised as follows:

"Policy C-P2, Consideration of Land Uses in Transportation Decision Making, ~~notes~~ requires that a comprehensive planning approach be utilized used in transportation decision making that considers the transportation consequences of land use changes to avoid operational and economic impacts existing and proposed land uses."

Page 3.5-20 of the RDEIR is revised as follows:

"Table 3.5-7 lists only one road in the City of Eureka, that would be affected by the implementation of General Plan Update, and countywide growth expected to occur during the planning period, ~~that~~ which is the responsibility under the jurisdiction of Caltrans and not Humboldt County."

Page 3.5-20 of the RDEIR is revised as follows:

"Community Infrastructure and Services Element Policy IS-P7, Mitigation of Cross-jurisdictional Impacts, directs the County to work with cities to mitigate impacts associated with new development for each affected jurisdiction."

Page 3.5-20 of the RDEIR is revised as follows:

"Policy C-P7, Joint Use of Traffic Models, encourages the use of area-wide travel demand models in the preparation of the County-Wide Transportation Plan (CWTP) and in evaluating projects with potentially significant transportation impacts ~~to use area-wide travel demand models.~~"

Page 3.5-20 of the RDEIR is revised as follows:

"Mitigation 3.5.3.1.a. The following policies shall be added to the Circulation Element and would require the implementation of transportation demand management programs with new larger -scale development in the unincorporated area."

Page 3.5-22 of the RDEIR is revised as follows (staff correction):

**Mitigation Measure 3.5.3.2.a.** ~~Amend existing policies and a~~ Add the following implementation measure and policy to the Circulation Element that establishes a multi-faceted program to lessen impacts relating to traffic congestion:

Page 3.5-23 of the RDEIR is revised as follows:

"3. Consider widening the ~~curbs~~ roadway/right-of-way to provide additional travel lanes, bike lanes, 2WLT, medians, parking lanes, and sidewalks, all as needed to meet demands."

Page 3.5-23 of the RDEIR is revised as follows:

"C-Px. Countywide Traffic Impact Fee Program. In coordination with the cities within the County, ~~shall~~ develop and implement a countywide traffic impact fee program that addresses impacts on major roads resulting from development in cities and unincorporated areas. Adopt this fee within one year of the adoption of the

General Plan Update. A traffic impact fee is currently being evaluated for the Greater Eureka Area, encompassing the Eureka urbanized area.”

Page 3.5-25 of the RDEIR is revised as follows:

“From approximately 800 feet south of the Kmart traffic signal to Washington Street, Broadway has a TWLTL.”

Page 3.5-25 of the RDEIR is revised as follows:

“While limited relief could be achieved through optimized signal timing, changes in traffic patterns occur routinely and signal timing should therefore be modified as necessary to reflect such changes (City of Eureka General Plan Update Mobility Policy Paper (<http://www.eureka2040gpu.com/Links/pdfs/Mobility%20Policy%20Paper%203-23-15.pdf>)).”

Page 3.5-25 of the RDEIR is revised as follows (staff correction):

“See Impact 3.5.3.24. -1 above, for a discussion of how Policies C-P6 Jurisdictional Coordination and Integration, and C-P7 Joint Use of Traffic Model, lessen potential impacts.”

Page 3.5-25 of the RDEIR is revised as follows:

“The traffic model projects that buildout of the General Plan Update, in conjunction with the implementation of city general plans within the County, would result in traffic levels that would reduce the LOS of the U.S. 101 Broadway corridor ~~at or below~~ to LOS “D<sub>7</sub>” or below, which is the General Plan update LOS standard and the LOS concept established by Caltrans for this facility. Therefore, this would be a potentially significant impact.”

Page 3.5-26 of the RDEIR the “Analysis” paragraph is revised as follows:

“However, with implementation of Mitigation Measure 3.5.3.2.d, impacts related to the future capacity of U.S. 101 would be reduced and LOS D is considered acceptable on U.S. 101.”

Page 3.5-26 of the RDEIR is revised as follows:

“Main Street and Fortuna Boulevard (North and South) in Fortuna ~~are~~ were the formerly alignment of U.S. 101, prior to the construction of the freeway along the western edge of the City.

Page 3.5-26 of the RDEIR is revised as follows:

“The City of Fortuna General Plan Draft EIR determined that no additional lanes would be needed in this area, however it states that the 9th Street and Main Street and 12th Street and Main Street intersections will drop to F in 2030, and includes a mitigation measure for a signalized new left-turn lane to east and west approaches to the 9th Street and Main Street intersection. Intersection improvements at 12th and Main are also required. After mitigation, these intersections will drop to D. Fortuna General Plan Policy TC-1.2 says LOS D is acceptable on Main Street.”

Page 3.5-26 of the RDEIR is revised as follows:

"See the discussion of Impact 3.5.3.2-41 above for a discussion of General Plan Update Circulation Element policies relating to minimum LOS standards and jurisdictional coordination."

Page 3.5-26 of the RDEIR is revised as follows:

"Based on the travel demand model, growth projected to occur during General Plan Update planning period in conjunction with the growth in the cities within the County would reduce the LOS of the segments of Main Street in Fortuna, between 7th Street and 13th Street to LOS D. However, any mitigation involving capacity improvements, typically include ~~the adding of~~ travel lanes, and this would mean adding lanes to areas that are largely built out, ~~leaving where there is~~ little available space to create new lanes without taking land from adjacent properties. or ~~degrading the desired~~ downtown amenities in the area. Therefore, this impact would be significant and unavoidable."

Page 3.5-27 of the RDEIR is revised as follows:

"The Fortuna General Plan EIR identifies the following mitigation programs that will improve the operation of this segment and related intersections: South Fortuna Boulevard-Ross Hill Road/Kenmar Road - implement right-turn overlap phasing on both Kenmar Road approaches; Kenmar Road/Eel River Drive – the northbound Eel River Drive approach will need to be widened to provide a right-turn lane; Kenmar Road/U.S. 101 ~~N~~North ~~R~~ramps – signalize and operate with permitted left-turn phasing (no additional lanes would be needed); Kenmar Road/U.S. 101 ~~S~~South ~~R~~ramps – signalize, add a right-turn lane on the eastbound approach and operate with permitted left-turn phasing. Upon implementation of these improvements this segments and associated intersections would operate at LOS "C" or better."

Page 3.5-27 of the RDEIR is revised as follows:

"See the discussion of Impact 3.5.3.2-41 above for a discussion of General Plan Update Circulation Element policies relating to minimum LOS standards and jurisdictional coordination. In particular, the General Plan Update Circulation Element includes the following policy relating to minimum LOS standards, C-P5, Level of Service Criteria, which strives to maintain a LOS "C" on all roadway segments, except for any portion of U.S. 101, where Level of Service D would be acceptable. See Impact 3.5.3.12-1 above, for a discussion of how Policies C-P6 Jurisdictional Coordination and Integration, and C-P7 Joint Use of Traffic Model, lessen potential impacts."

Page 3.5-28 of the RDEIR is revised as follows:

"Implementation of the General Plan Update would generate levels of development that result in increased traffic volumes on roads within the County that could ~~C~~conflict with an applicable regional level of service standard."

Page 3.5-28 of the RDEIR is revised as follows:

"e)b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways."

Page 3.5-30 of the RDEIR is revised as follows:

"The Arcata-Eureka Airport Master Plan Report (September 2005) for the California Redwood Coast – Humboldt County Airport contains forecasts of future airport operations forecasts."

Page 3.5-31 of the RDEIR is revised as follows:

"Aircraft operations at the Dinsmore, Garberville, Murray Field, and Rohnerville airports are expected to increase by between 15 and 18 percent between 2010 and 2025 according to Table AS3 Aviation Activity Forecast – Annual Operations, of the Regional Transportation Plan Aviation Systems Element. Samoa Field, Hoopa Airport, and Shelter Cove Airport are not anticipated to experience increases in aircraft operations in the next 20 years. The airport master plans identify the improvements, if any, that may be required to accommodate future aircraft operations."

Page 3.5-32 of the RDEIR is revised as follows:

"... The Circulation Element contains policies to ensure that roadway design reduces roadway safety hazards and accommodates multi-modal users."

Page 3.5-32 of the RDEIR is revised as follows:

"The Circulation Element includes policies and standards that ~~that~~ relate to safe circulation facilities for all transportation modes..."

## Chapter 3.7 Hazards and Hazardous Materials

Page 3.7-21 of the RDEIR is revised as follows:

"Table 3.7-54 below displays how much land is planned for industrial uses in Humboldt County. Including the coastal zone area, which is not the subject of this EIR, there are over 3,370 acres of land planning for industrial purposes."

Page 3.7-21 and 3.7-22 of the RDEIR are revised as follows:

**Table 3.7-5. Land Planned for Industrial Uses.**

Community Planning Area	Acres by Land Use Designation					
	IG	IR	MB	MC	MG	Total
Arcata	66.3	13.4				79.7
Avenues-Myers Flat	12.9					12.9
Avenues-Stafford-Redcrest	45.3					45.3
Blue Lake	231.1	218.3				449.4
Carlotta/Hydesville	30.7	35.0				65.7
<u>Eel River (CZ)</u>	<u>90.6</u>	-	-	-	-	<u>90.6</u>
Fieldbrook-Glendale	75.2	4.2				79.4
Fortuna	148.6					148.6
Garberville/Redway/Benbow	112.2	51.2				163.4
<u>Humboldt Bay (CZ)</u>	<u>475.8</u>	-	<u>11.9</u>	<u>970.6</u>	<u>14.4</u>	<u>1,472.7</u>
McKinleyville	119.7	2.1				121.8
<u>McKinleyville (CZ)</u>	-	-	<u>34.1</u>	-	-	<u>34.1</u>
<u>North Coast (CZ)</u>	<u>60.7</u>	-	-	-	-	<u>60.7</u>
Orick		20.2				20.2
Orleans	37.1					37.1
Rio Dell/Scotia	282.3					282.3
Willow Creek	65.5	19.9				85.4
Outside CPAs	129.3	17.4		0.1	0.6	147.3
<b><u>Total</u></b>	<b><u>1,983.3</u></b>	<b><u>381.7</u></b>	<b><u>46.0</u></b>	<b><u>970.8</u></b>	<b><u>15.0</u></b>	<b><u>3,396.7</u></b>

Page 3.7-22 of the RDEIR is revised as follows:

"Table 3.7-54, Land Planned for Industrial Uses, identifies the acres within each community planning area that are planned for industrial uses."

## Chapter 3.10 Hydrology and Water Quality

Page 3.10-22 of the RDEIR is revised as follows (staff correction):

**Mitigation 3.10.3.1.a.** The following policy ~~and implementation measure~~ shall be added to the Water Resources Element to lessen impacts resulting from erosion, sedimentation, and siltation:

**Mitigation 3.10.3.1.b.** The following policy shall be modified to apply to all development in order ~~the Water Resources Element~~ to improve water quality within watersheds subject to TMDL Controllable Sediment Discharge Inventories:

## Chapter 3.11 Biological Resources

Page 3.11-14 of the RDEIR is revised as follows:

**BR-S11. Wetlands Defined.** The County shall follow the US Army Corps of Engineers Wetland Delineation manual in the identification and classification of wetlands which considers wetlands as those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs and similar areas. ~~lands transitional between terrestrial and aquatic systems where the water table is usually at or near the surface or the land is covered by shallow water. Wetlands must have all of the following three attributes: (1) at least periodically, the land supports hydrophytes, (2) the substrate is predominantly undrained hydric soil, and (3) the substrate is non soil and is saturated with water or covered by shallow water at some time during the growing season of each year. An area is wetland if, under normal circumstances, (1) the area has continuous or recurrent saturation of the upper substrate caused by groundwater, or shallow surface water, or both; (2) the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and (3) the area's vegetation is dominated by hydrophytes or the area lacks vegetation."~~

Page 3.11-17 of the RDEIR is revised as follows:

"Implementation of the General Plan Update ~~would~~ could result in additional development that conflicts with adopted habitat conservation plans."

Page 3.11-18 of the RDEIR is revised as follows:

"Under the proposed General Plan Update, residential uses are planned at densities of 40 to 160 acres per dwelling unit on lands planned T or TC, which are the areas covered by the HCP's. At maximum buildout, this could theoretically result in the construction of as many as 20,000 ~~The Estimated Maximum Development Potential shown in Table 2.5-1 of this RDEIR is 7,814 housing units on the 900,000 acres of planned timberlands, although historical growth trends and Department of Finance projections would indicate that only limited demand for possible development is likely to exist~~ 44 housing units are likely to be developed in these areas during the 2016 - 2040 timeframe. Housing construction was not an issue that was considered or addressed by the HCPs indicated above."

## Chapter 3.11 Air Quality

The last paragraph on page 3.12-15 of the RDEIR is revised as follows (staff correction):

Implementation of Mitigation Measure 3.12.65.2 would insure that any future development adjacent to potential sources of TAC's would not expose sensitive receptors to an increased health risk.

## Chapter 3.16 Scenic Resources

Page 3.16-13 of the RDEIR is revised as follows (staff correction):

**Mitigation 3.16.3.2.a.** The following policy shall be added to the Biological Resources section of the Conservation and Open Space Element ~~would~~ to lessen potential impacts to natural amenities that are important to visual character:

## Chapter 4. Mitigation Monitoring and Reporting Program

This Mitigation Monitoring and Reporting Program (MMRP) has been prepared to comply with the requirements of State law (Public Resources Code Section 21081.6). State law requires the adoption of an MMRP when mitigation measures are required to avoid significant impacts. The MMRP is intended to ensure compliance with mitigation measures during implementation of the project.

This MMRP has been formulated based upon the findings of the RDEIR, and the comments received on the RDEIR and addressed herein. This MMRP identifies mitigation measures recommended in the RDEIR to avoid or reduce identified impacts, and specifies the parties responsible for, and timing of, their implementation and monitoring/reporting.

Table IV-1 below comprises the core of the MMRP and is explained as follows:

- The first column includes mitigation measures identified in the GPU EIR. The Policies, Standards and Implementation Measures included in the GPU itself, which serve to reduce the potential impacts of the GPU below a threshold of significance (in most cases) are part of the 'project', and are therefore not included in the table. The mitigation measures included in the table provide amended or additional GPU text, Policies, Standards or Implementation Measures required to insure potential impacts are sufficiently mitigated.
- The second column entitled "Party Responsible for Implementation" refers to the person(s), in this case County personnel, who will undertake the mitigation measures.
- The third column entitled "Implementation Method and Timing" identifies how the mitigation measure will be implemented, and when and/or for how long implementation will take. This column may include a citation for an Implementation Measure(s) associated with a policy included in a mitigation measure as further demonstration of how that policy will be implemented.

Note that all mitigation measures require the amendment of or addition of GPU text, Policies, Standards or Implementation Measures. The timing for the additions or amendments will be upon adoption of the GPU by the Board of Supervisors with the actual edits to the GPU occurring within 1 to 2 months. The timing and responsible party for these actions will not be further addressed in the table below.

The party responsible for monitoring the implementation of the mitigation measures, and the timing for that monitoring, is also part of the MMRP. Pursuant to Section 15097(b) of the CEQA Guidelines, "where the project at issue is the adoption of a general plan, specific plan, community plan or other plan-level document (zoning,



ordinance, regulation, policy), the monitoring plan shall apply to policies and any other portion of the plan that is a mitigation measure or adopted alternative. The monitoring plan may consist of policies included in plan-level documents. The annual report on general plan status required pursuant to the Government Code is one example of a reporting program for adoption of a city or county general plan." Long Range Planning will be the Responsible Monitoring Party for implementation of the mitigation identified in the MMRP. The County's annual report to the California Office of Planning and Research, reporting on the County's progress implementing the General Plan, is prepared by Long Range Planning, and will serve to provide the monitoring and reporting portion of the MMRP annually.

**TABLE IV-1 MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure	Party Responsible for Implementation	Implementation Method and Timing	Compliance Verification		
			Initials	Date	Comments
<b>AGRICULTURAL AND TIMBER RESOURCES</b>					
None					
<b>AIR QUALITY</b>					
<p><b>Mitigation Measure 3.12.4.2.</b> Add Implementation Measure AQ-IM7 to the Draft General Plan as follows:</p> <p><b>AQ-IM7.</b> Regulate the location and operation of land uses to avoid or mitigate harmful or nuisance levels of air emissions to the following sensitive receptors: residential uses, hospitals and nursing/convalescent homes, hotels and lodging, schools and day care centers and neighborhood parks. New development shall follow the recommendations for siting new sensitive land uses consistent with the ARB's recommendation as shown in Table 3.12-4.</p>	Current Planning	Project Review Ongoing			
<b>BIOLOGICAL RESOURCES</b>					
<p><b>Mitigation Measure 3.11.3.2.</b> Replace BR-S11 with the below definition of wetlands:</p> <p><b>BR-S11. Wetlands Defined.</b> The County shall follow the US Army Corps of Engineers Wetland Delineation manual in the identification and classification of wetlands which considers wetlands as those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs and similar areas, lands transitional between terrestrial and</p>	Current Planning	WR-IMx1 2 to 5 years  Project Review Ongoing			

TABLE IV-1 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Party Responsible for Implementation	Implementation Method and Timing	Compliance Verification		
			Initials	Date	Comments
<p><del>aquatic systems where the water table is usually at or near the surface or the land is covered by shallow water. Wetlands must have all of the following three attributes: (1) at least periodically, the land supports hydrophytes, (2) the substrate is predominantly undrained hydric soil, and (3) the substrate is non soil and is saturated with water or covered by shallow water at some time during the growing season of each year. An area is wetland if, under normal circumstances, (1) the area has continuous or recurrent saturation of the upper substrate caused by groundwater, or shallow surface water, or both; (2) the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and (3) the area's vegetation is dominated by hydrophytes or the area lacks vegetation."</del></p>					
<p><b>Mitigation Measure 3.11.3.5.a.</b> To avoid impacts to established Habitat Conservation Plan areas through direct conversion to other uses, the following implementation measure shall be modified in the Conservation and Open Space Element, Biological Resources section that states the following:</p> <p><i><b>BR-IM1. Biological Resource Maps.</b> The County shall maintain <u>the best available data in the form of GIS maps for the location and extent of wetlands, critical habitats, streamside management areas, <u>Habitat Conservation Plan Areas</u>, rookeries, and ranges of species identified in the California Natural Diversity Database.</u></i></p>	Planning/ Administration	Core County Service  Ongoing			
<b>CLIMATE CHANGE AND GREENHOUSE GAS EMISSIONS</b>					
None					

**TABLE IV-1 MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure	Party Responsible for Implementation	Implementation Method and Timing	Compliance Verification		
			Initials	Date	Comments
<b>CULTURAL RESOURCES</b>					
None					
<b>ENERGY CONSUMPTION AND CONSERVATION</b>					
None					
<b>GEOLOGY AND SOILS</b>					
<p><b>Mitigation Measure 3.8.3.2.a.</b> To lessen impacts relating to water quality resulting from increased erosion, the following mitigation is required:</p> <p><i>Implement Mitigation Measures 3.10.3.1.a and 3.10.3.1.b from Impact 3.10.3.1: Degrade Water Quality or Exceed Waste Discharge Requirements in Chapter 3.10, Hydrology and Water Quality.</i></p>					
					See Mitigation Measures 3.10.3.1.a and 3.1.3.1.b. below
<b>HAZARDS AND HAZARDOUS MATERIALS</b>					
<p><b>Mitigation Measure 3.7.4.2.a.</b> To ensure consistency between the ALUCP and the General Plan, prior to adopting the Land Use Diagram:</p> <p><i>Prior to adopting the General Plan Update, amend land use maps to ensure that maximum allowable residential densities and maximum allowable building occupancies are consistent with the Recommended Compatibility Zones contained in the March 1993 Airport Land Use Compatibility Plan.</i></p> <p><i>Or, The following standard shall be added:</i></p>					
	Long Range Planning	Plan Map Revision prior to GPU adoption 1 to 2 years			
		Plan map revision			

TABLE IV-1 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Party Responsible for Implementation	Implementation Method and Timing	Compliance Verification		
			Initials	Date	Comments
<p><b>S-SX. Airport Land Use Compatibility Zone Overlay.</b> <u>An Airport Land Use Compatibility Zone for all public use airports shall be established that matches the Recommended Compatibility Zones contained in the March 1993 Airport Land Use Compatibility Plan, as amended, for Humboldt County Airports, and that limits the maximum allowable residential density and building occupancy for each land use designation subject to such zones, to the Airport/Land Use Safety Compatibility Criteria of the Airport Land Use Compatibility Plan (Table 14-A).</u></p>	Long Range Planning	At GPU adoption			
<p><b>Mitigation Measure 3.7.4.2.b.</b> To ensure consistency between the ALUCP and the General Plan, the following implementation measures shall be added:</p> <p><b><u>S-IMx4. Update Airport/Land Use Safety Compatibility Criteria.</u></b> <u>The County shall update Airport/Land Use Safety Compatibility Criteria (Table 14-A), consistent with amendments to the ALUCP.</u></p> <p><b><u>S-IMx5. Airport Safety Review Combining Zone.</u></b> <u>Amend the Zoning Maps to apply an Airport Safety Review Combining Zone, indicated by "AP", that matches the outer boundaries of the Recommended Compatibility Zones contained in the March 1993 Airport Land Use Compatibility Plan, as amended, for Humboldt County Airports. Until such time as the Zoning Maps are amended, places a note on the record for each parcel in Humboldt County's online permit management system that lies within the outer boundaries of the Recommended Compatibility Zones.</u></p>	Long Range Planning	Plan Update as needed			
<p><b>Mitigation Measure 3.7.4.5.a.</b> To lessen impacts resulting from the</p>	Current Planning	Project Review			

**TABLE IV-1 MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure	Party Responsible for Implementation	Implementation Method and Timing	Compliance Verification		
			Initials	Date	Comments
<p>exposure of people or structures to a significant risk of loss, injury or death involving wildland fires, the following mitigation is required. Amend Standard FR-S2 Forestland-Residential Interface (FRI), Section E to read as follows:</p> <p><b>FR-S2. Forestland-Residential Interface (FRI).</b> Require new residential subdivisions adjacent to TPZ and public forestlands to include forested buffers and building setbacks between residential uses and adjacent timberlands to minimize use conflicts and safety hazards and, if necessary, require fire breaks around all or a portion of the development in consultation with CALFIRE.</p> <p>For residential development, require compliance with fire safe standards, and ongoing fire protection management programs <u>developed by qualified experts.</u></p> <p>For residential development in high and very high fire severity zones, require <u>the establishment and maintenance of a fire breaks and open space adjacent to forestlands, consistent with CALFIRE recommendations, and ongoing fire protection management programs developed by qualified experts</u> to ensure defensible space.</p>		Ongoing			
<b>HYDROLOGY AND WATER QUALITY</b>					
<p><b>Mitigation Measure 3.10.3.1.a.</b> The following policy shall be added to the Water Resources Element to lessen impacts resulting from erosion, sedimentation, and siltation:</p> <p><i><b>WR-Px. Continue to Implement Water Quality Regulations.</b></i>  <i>Continue to implement Division 3, Building Regulations, Section 331-12, Grading, Excavation, Erosion, and Sedimentation Control Regulations, and Division 1, Planning Zoning Regulations</i></p>	Current Planning Building	Project Review Ongoing			

**TABLE IV-1 MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure	Party Responsible for Implementation	Implementation Method and Timing	Compliance Verification		
			Initials	Date	Comments
<i>Chapter 6 - General Provisions and Exceptions Section 314-61.1 Streamside Management Area Ordinance.</i>					
<p><b>Mitigation Measure 3.10.3.1.b.</b> The following policy shall be modified to apply to all development in order to improve water quality within watersheds subject to TMDL Controllable Sediment Discharge Inventories:</p> <p><b><i>WR-Px2. Mitigate Controllable Sediment Discharge Sites.</i></b>  <i>Proposed Discretionary development applications involving a site identified as part of the TMDL Controllable Sediment Discharge Inventory shall be conditioned to reduce sediment discharge.</i></p>	<p>Long Range Planning</p> <p>Current Planning</p>	<p>WR-IMx1</p> <p>2 to 5 years</p> <p>Project Review</p> <p>Ongoing</p>			
<p><b>Mitigation Measure 3.10.3.2.a.</b> The following policy shall be added to the Water Resources Element to improve groundwater recharge capacity:</p> <p><b><i>WR-Px. Enhance Groundwater Recharge Capacity.</i></b> Encourage watershed management practices that enhance infiltration of rainfall into the groundwater.</p>	<p>Board of Supervisors</p> <p>Various County Departments</p>	<p>Core County Service and Project Review</p> <p>Ongoing</p>			
<p><b>Mitigation Measure 3.10.3.4.a.</b> The following Safety Element implementation measure shall be added to require the County address new development in tsunami hazard areas:</p> <p><b><i>S-S7. Tsunamis.</i></b> New development below the level of the 100-year tsunami run-up elevation shall be limited to public access, boating, public recreation facilities, agriculture, wildlife management, habitat restoration, and ocean intakes, outfalls, pipelines, and dredge spoils disposal.</p>	<p>Current Planning</p>	<p>Project Review</p> <p>Ongoing</p>			
<b>LAND USE, HOUSING AND POPULATION</b>					

**TABLE IV-1 MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure	Party Responsible for Implementation	Implementation Method and Timing	Compliance Verification		
			Initials	Date	Comments
<p><b>Mitigation Measure 3.1.3.2.a.</b> Add the following implementation measure to the Growth Planning section of the Land Use Element to reduce potential impacts related to conflict between the General Plan Update and applicable land use regulations:</p> <p><i>Implementation Measure GP-IMX, Zoning Consistency. Within two years after the adoption of the General Plan Update, revise the Zoning Regulations to re-establish zoning consistency with the policies of the General Plan and amend the Zoning Map to achieve consistency with the General Plan Land Use Map.</i></p>	Long Range Planning	Zoning Regulations  1 to 2 years			
<p><b>Mitigation Measure 3.1.3.2.b.</b> Add the following narrative to Section 10.1.1, Relationship to Other Elements, and Table 10-A Conservation and Open Space Policy Summary, of the Conservation and Open Space Elements to fully demonstrate consistency between General Plan Update and state law:</p> <p><b>Add the following text to the Section 10.1.1, Relationship to Other Elements:</b></p> <ul style="list-style-type: none"> <li><i>Open Space for military bases, installations, and operating and training areas — areas adjacent to military installations, military training routes, and underlying restricted airspace that can provide additional buffer zones to military activities and complement the resource values of the military lands. [add to the bottom of page 10-1]</i></li> <li><i>Open Space for Native American historic, cultural or sacred site — Open space for the protection of places, features, and objects described in Sections 5097.9 and 5097.993 of the Public Resources Code. [add to the bottom of page 10-1]</i></li> </ul> <p><i>Open Space for military bases, installations, and operating and training areas:</i></p>	Long Range Planning	Amendment to Plan narrative  Upon GPU Adoption			



**TABLE IV-1 MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure	Party Responsible for Implementation	Implementation Method and Timing	Compliance Verification		
			Initials	Date	Comments
<ul style="list-style-type: none"> <li>• <i>Narrative description of these open space lands and a map showing their locations is included in the Safety Element.</i></li> <li>• <i>Policies to minimize impacts to military trainings areas are included in the Safety Element.</i></li> <li>• <i>Policies to provide notification to the military are included in the Safety Element.</i></li> </ul> <p><i>[add to the bottom of page 10-2]</i></p> <p><b>Open Space for Native American historic, cultural or sacred site:</b>  <i>Narrative description of these open space lands is included in the Cultural Resources Section of the Conservation and Open Space Elements.</i></p>					
<ul style="list-style-type: none"> <li>• <i>Policies relating to Native American Tribal consultation are included in the Cultural Resources Section of the Conservation and Open Space Elements.</i></li> <li>• <i>Policies relating to the identification, protection, and enhancement of cultural resources are included in the Cultural Resources Section of the Conservation and Open Space Elements.</i></li> </ul> <p><i>[add to the bottom of page 10-2]</i></p> <p><b>Add to Table 10-A. Conservation and Open Space Policy Summary</b></p> <p><b>Open Space for Military Training Areas</b></p> <ul style="list-style-type: none"> <li>A. Minimize impacts to military trainings areas</li> <li>B. Provide notification to the military of projects that could affect military readiness.</li> </ul>					

**TABLE IV-1 MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure	Party Responsible for Implementation	Implementation Method and Timing	Compliance Verification		
			Initials	Date	Comments
<p><b>Mitigation Measure 3.1.3.2.c.</b> Add a map identifying the Unincorporated Legacy Communities within the County as well as the following policy to the Community Infrastructure and Services Element to reduce potential impacts related to conflict between the General Plan Update and state General Plan law:</p> <p><b>Appendix F: Map Book.</b> <i>Add a map of Humboldt County showing the location of Unincorporated Legacy Communities.</i></p> <p><b>Policy IS-PX3, Unincorporated Legacy Communities.</b> <i>On or before the due date for each subsequent revision of its Housing Element, the County shall review, and if necessary amend, the General Plan to update the analysis of unincorporated legacy communities.</i></p>	<p>Long Range Planning</p> <hr/> <p>Long Range Planning</p>	<p>Plan Map Revision 30 days from GPU adoption</p> <hr/> <p>Plan Amend. Housing Element Update</p>			
<b>MINERAL AND ENERGY RESOURCES</b>					
None					
<b>NOISE</b>					
<p><b>Mitigation Measure 3.6.3.2.a.</b> Amend Implementation Measure N-IM7x., Noise Control Ordinance, to the Noise Element to require that construction noise parameters for discretionary projects be specified.</p> <p><b>N-IM7x. Noise Control Ordinance.</b> <i>Prepare and consider a noise control ordinance to regulate noise <u>and vibration</u> sources in order to protect persons from existing or future excessive levels of noise <u>and/or vibration</u> which interfere with sleep, communication, relaxation, health or legally permitted use of property. The ordinance shall define excessive levels of noise <u>for construction activities to be incorporated as permit requirements and other noise sources and may exempt or</u></i></p>	<p>Long Range Planning</p>	<p>Zoning Regulations  5 years</p>			

**TABLE IV-1 MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure	Party Responsible for Implementation	Implementation Method and Timing	Compliance Verification		
			Initials	Date	Comments
<p><i>modify noise requirements for agricultural uses, <del>construction activities</del>, school functions, property maintenance, waste collection and other sources. The ordinance shall include responsibilities and procedures for enforcement, abatement and variances.</i></p>					
<p><b>Mitigation Measure 3.6.3.3.a.</b> The following implementation measure shall be added to the Noise Element.</p> <p><b><i>N-IMx. Garberville Airport Noise Impact Combining Zone.</i></b> Add a Noise Impact (N) Combining Zone to the areas surrounding the Garberville Airport that are subject to noise levels equal to or above 60 CNEL according to Figure 5B of the 2007 Garberville Airport Master Plan Report, or the most recent Garberville Airport Master Plan Report.</p>	<p>Long Range Planning</p>	<p>Zoning Map Revision</p> <p>1 to 2 years</p>			
<p><b>PARKS AND RECREATION</b></p>					
<p><b>Mitigation 3.15.3.1.a.</b> In order to protect existing parkland from deterioration that could result from development pursuant to the General Plan Update, the following Policies and Implementation Measures shall be added to the Community Infrastructure and Services Element:</p>					
<p><b><i>IS-Px. Parks Master Plan.</i></b> In cooperation with other park service providers, the County shall establish and maintain a Parks Master Plan that would assess current facilities within each inland and coastal planning area, determine appropriate locations for new facilities, and identify funding options.</p>	<p>Long Range Planning</p>	<p>Plan or Study</p> <p>2 to 5 years</p>			
<p><b><i>IS-Sx. Interim Parks and Recreation Standards.</i></b> Parks and recreation standards contained in the Government Code Section 66477 shall be used as the standard for parkland dedication in the review of divisions of land for which a</p>	<p>Current Planning</p>	<p>Project Review</p> <p>Ongoing</p>			

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Mitigation Measure	Party Responsible for Implementation	Implementation Method and Timing	Compliance Verification		
			Initials	Date	Comments
<p><i>tentative map is required pursuant to Section 66426, until such time that the County has established parks and recreation standards for new development that differentiate between urban and rural settings; specify acreage of park land of 3 acres per 1,000 residents; and specify land dedication, in-lieu fee, or other mechanisms to fund park and recreation improvements and funding for operation and maintenance.</i></p>					
<b>PUBLIC SERVICES</b>					
None					
<b>SCENIC RESOURCES</b>					
<p><b>Mitigation 3.16.3.1.a.</b> Standard SR-SXXX, Scenic Highway Map, shall be added to the General Plan Update to reduce potential adverse impacts to scenic highways that could be caused by ministerial projects until SR-IM1, Mapping of Scenic Areas and Scenic Highways, is implemented:</p> <p><i>SR-SXXX. Scenic Highway Map. Until such time as a General Plan Scenic Highway Roadway Map is prepared and adopted, Humboldt County Highways listed in Sections 263.1 through 263.8 of the California Streets and Highways Code shall be considered to be Scenic Highways pursuant to Policy SR-P3, Scenic Highway Protection, and the County shall address the potential for significant impacts to scenic resources during ministerial and discretionary permit review.</i></p>	Current Planning	Project Review Ongoing			
<p><b>Mitigation 3.16.3.2.a.</b> The following policy shall be added to the Biological Resources section of the Conservation and Open Space Element to lessen potential impacts to natural amenities that are important to visual character:</p>	Long Range Planning	Plan or Study 2 to 5 years			

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Mitigation Measure	Party Responsible for Implementation	Implementation Method and Timing	Compliance Verification		
			Initials	Date	Comments
<p><i><b>BR-Px. Landmark Trees.</b> Establish a program to identify and protect landmark trees, including trees that exhibit notable characteristics in terms of their size, age, rarity, shape or location.</i></p>					
<p><b>Mitigation 3.16.3.3.a.</b> In order to minimize light trespass, light pollution, and glare, new development and projects that would make significant parking lot improvements or add new lighting would be required to prepare a lighting plan. The following new program would need to be added to the Scenic Resources Chapter of the Conservation and Open Space Element:</p> <p><i><b>SR-IMX Lighting Design Guidelines.</b> Amend the Zoning Regulations to include lighting design guidelines for discretionary projects. Require new development and projects that would make significant parking lot improvements or add new exterior lighting to submit a lighting plan consistent with these guidelines. Lighting design guidelines should address:</i></p> <ul style="list-style-type: none"> <li>A. <i>Intensity – Acceptable standards shall be defined for various land uses and development types specifying the maximum allowable total lumens per acre.</i></li> <li>B. <i>Directional Control – Standards shall be developed to minimize the upward transmission and intensity of light at various distances from its source through the use of full-cutoff lighting, downward casting, shielding, visors etc.</i></li> <li>C. <i>Signage – Standards with respect to illuminated signs shall be developed that prohibit or limit the size, spacing, design, upward transmission of light, and hours of operation. In addition, signs should be white or light colored lettering on dark backgrounds.</i></li> <li>D. <i>Night Lighting – Hours of operation for various uses shall be specified in order to prohibit all night lighting except when warranted for public safety reasons. On demand lighting</i></li> </ul>	<p>Long Range Planning</p>	<p>Zoning Regulations</p> <p>2 to 5 years</p>			

**TABLE IV-1 MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure	Party Responsible for Implementation	Implementation Method and Timing	Compliance Verification		
			Initials	Date	Comments
<p><i>shall be encouraged.</i></p> <p>E. <i>Incentives – The County shall develop incentives for residents and businesses encouraging the conversion of existing lighting sources to compliant ones.</i></p> <p>F. <i>Enforcement – These standards shall be incorporated into the County Development Code and design review process for new development.</i></p>					
<b>TRANSPORTATION</b>					

**TABLE IV-1 MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure	Party Responsible for Implementation	Implementation Method and Timing	Compliance Verification		
			Initials	Date	Comments
<p><b>Mitigation 3.5.3.1.a.</b> The following policies shall be added to the Circulation Element and would require the implementation of transportation demand management programs with new larger scale development in the unincorporated area.</p>					
<p><i><b>C-P3. Consideration of Transportation Impacts in Land Use Decision Making.</b> Decisions to change or expand the land use of a particular area shall include an analysis of the impacts to existing and proposed transportation facilities and services so as to minimize or avoid significant operational, environmental, economic, and health-related consequences.</i></p>	<p>Long Range Planning</p>	<p>Plan Amend. As needed</p>			
<p><i><b>C-Px9. Regional Transportation Demand Management Funding.</b> Encourage HCAOG to seek funding to support transportation demand management planning and to promote strategies that can lower the demands made on the road and highway system, reduce energy consumption, and improve air quality.</i></p>	<p>Board of Supervisors</p>	<p>Core County Service Ongoing</p>			
<p><b>C-Px10. Transportation Demand Management Programs.</b> Require residential subdivisions and multifamily development that would result in fifteen or more dwelling units, and non-residential development that would employ greater than ten persons, and that require a discretionary permit, to comply with County transportation demand management programs.</p>	<p>Current Planning Public Works Land Use</p>	<p>Project Review Ongoing</p>			
<p><i><b>C-IMX6. Transportation Demand Management.</b> Amend the Zoning Regulations to include criteria for the development and implementation of transportation demand management programs as required by this Plan.</i></p>	<p>Long Range Planning</p>	<p>Zoning Regulations 2 to 5 years</p>			
<p><b>Mitigation Measure 3.5.3.2.a.</b> Add the following implementation measure and policy to the Circulation Element that establishes a</p>					

**TABLE IV-1 MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure	Party Responsible for Implementation	Implementation Method and Timing	Compliance Verification		
			Initials	Date	Comments
<p>multi-faceted program to lessen impacts relating to traffic congestion:</p> <p><b><i>C-IMX7. Congestion Relief Planning and Implementation Program.</i></b> <i>The County shall utilize the best available traffic information, including the Humboldt County Travel Demand Model, other models and plans, and transportation impact analyses to identify roads that are currently capacity constrained or projected to become capacity constrained at some point as a result of General Plan implementation, and shall work cooperatively with HCAOG, Caltrans, applicable cities, HTA, or other agencies to implement a coordinated traffic management strategy to plan and prioritize transportation demand measures and roadway improvements to reduce roadway congestion along such roadways.</i></p> <p><i>The County shall use state and federal transportation improvement funds available directly to the County or through HCAOG, other grant funds, project related exactions, other available County funds, and impact fees to fund congestion relief improvements.</i></p> <p><i>The following steps shall be taken to address specific capacity limitations:</i></p> <ul style="list-style-type: none"> <li>A. <i>Monitor vehicle trips and other modes of travel at regular intervals.</i></li> <li>B. <i>Solicit public involvement in transportation improvement planning prior to implementing any improvements.</i></li> <li>C. <i>Identify transportation demand management measures that could be applied to the areas served by the specific roadway(s) to reduce peak-hour vehicle trips and congestion, such as:</i> <ul style="list-style-type: none"> <li>1. <i>Coordinate with school districts to expand school bus operations, create a "walking school bus" program,</i></li> </ul> </li> </ul>	<p>Public Works Land Use</p> <p>Board of Supervisors</p>	<p>Project Review and Transportation Planning</p> <p>Ongoing</p>			



**TABLE IV-1 MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure	Party Responsible for Implementation	Implementation Method and Timing	Compliance Verification		
			Initials	Date	Comments
<p><i>create programs for shared rides to school, or other programs to reduce school-related vehicle trips;</i></p> <p>2. <i>Coordinate with transit providers to identify strategies to improve and expand bus service and encourage ridership;</i></p> <p>3. <i>Coordinate with businesses served by the roadway(s) and encourage the use of appropriate transportation demand measures to reduce employee-related vehicle trips;</i></p> <p>4. <i>Identify bicycle and pedestrian enhancements that improve the ability of motorists to shift short trips to non-motorized modes.</i></p> <p>D. <i>Use the following roadway and intersection improvements, as appropriate, in combination with "E" below, to accommodate additional traffic volumes while providing a safe multi-modal circulation system:</i></p> <p>1. <i>Public education</i></p> <p>2. <i>Signage</i></p> <p>3. <i>Stop signs</i></p> <p>4. <i>Traffic signals or roundabouts</i></p> <p>5. <i>Traffic signal timing changes and signal coordination</i></p> <p>6. <i>Striped turn-lanes</i></p> <p>7. <i>Turn movement prohibitions</i></p> <p>8. <i>Bulb-outs and chicanes</i></p> <p>9. <i>Change stop sign location of two-way stop signs at four-way intersections to reduce unwarranted stops on parallel alternative routes</i></p> <p>10. <i>Develop parallel routes or make parallel routes into couplets</i></p> <p>E. <i>Implement the following measures in a stepwise manner to provide additional vehicle capacity on existing two-lane</i></p>					

**TABLE IV-1 MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure	Party Responsible for Implementation	Implementation Method and Timing	Compliance Verification		
			Initials	Date	Comments
<i>roads:</i>					
<ol style="list-style-type: none"> <li>1. <i>Within the existing curbs, provide a two-way left turn lane (2WLTL), two travel lanes, and up to two parking lanes when space permits – provides a capacity of up to 16,000 vehicles per day.</i></li> <li>2. <i>Provide 2WLTL, two travel lanes, two bike lanes, and up to two parking lanes when space permits (usually a parking lane needs to be removed to add bike lanes) - provides a capacity of up to 16,000 vpd.</i></li> <li>3. <i>Identify parallel alternate routes with available traffic capacity to which some of the excess traffic can be diverted and utilize intersection improvements listed in "D" above to encourage drivers to divert to identified alternate routes.</i></li> </ol>					
<p>F. <i>If transportation demand management measures and capacity improvements located within the existing two-lane cross-section have been demonstrated to be inadequate:</i></p> <ol style="list-style-type: none"> <li>1. <i>Consider accepting a lower level of service;</i></li> <li>2. <i>Within the existing curbs, provide four lanes consisting of two travel lanes and no parking - provides a capacity of up to 20,000 vpd. Note: Although a four-lane undivided roadway section provides more capacity than two lanes and one 2WLTL, the section with a 2WLTL is considered safer.</i> <ol style="list-style-type: none"> <li>a. <i>Within the existing curbs, same as above but with a.m. and p.m. peak hour left turn prohibitions into driveways and side streets - provides a capacity of up to 22,000 vpd.</i></li> <li>b. <i>Within the existing curbs, same as above but with a.m. and p.m. peak hour left turn prohibitions into driveways and side streets; widen curbs to provide left turn pockets at key intersections – provides a</i></li> </ol> </li> </ol>					

**TABLE IV-1 MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure	Party Responsible for Implementation	Implementation Method and Timing	Compliance Verification		
			Initials	Date	Comments
<p><i>capacity of 24,500.</i></p> <p>3. <i>Consider widening the curbs to provide additional travel lanes, bike lanes, 2WLT, medians, parking lanes, and sidewalks, all as needed to meet demands.</i></p> <p><b>C-Px. Countywide Traffic Impact Fee Program.</b> <i>In coordination with the cities within the County, shall develop and implement a countywide traffic impact fee program that addresses impacts on major roads resulting from development in cities and unincorporated areas. Adopt this fee within one year of the adoption of the General Plan Update. A traffic impact fee is currently being evaluated for the Greater Eureka Area, encompassing the Eureka urbanized area.</i></p>	<p>Board of Supervisors</p> <p>Public Works Land Use</p>	<p>Plan or Study</p> <p>1 year from GPU Adoption</p>			
<p><b>Mitigation Measure 3.5.3.2.c.</b> Modify Policy C-P17 to demonstrate support for the implementation of Caltrans U.S. 101 Eureka-Arcata Corridor Improvement Project, in a manner consistent with the General Plan Update.</p> <p><b>C-P17. Highway Improvements.</b> Encourage state and federal highway improvements that promote safety and connectivity for all users, especially for communities with highway arterials. <u>The County supports a strategy for safety and operational improvements to the U.S. Highway 101 Safety Corridor that is implemented in a manner consistent with the General Plan.</u></p>	<p>Public Works</p> <p>Board of Supervisors</p>	<p>C-IM5</p> <p>Core County Service</p> <p>5 years</p>			
<p><b>Mitigation Measure 3.5.3.2.d.</b> A Circulation Element policy shall be added to direct the County to participate in joint planning for the Broadway corridor:</p> <p><b>C-Px, U.S. 101/Broadway Corridor.</b> The County shall participate in joint planning for capacity improvements relating to the U.S. 101/Broadway corridor with HCAOG, Caltrans, and the City of Eureka.</p>	<p>Board of Supervisors</p> <p>Public Works</p>	<p>Core County Services</p> <p>Ongoing</p>			

TABLE IV-1 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Party Responsible for Implementation	Implementation Method and Timing	Compliance Verification		
			Initials	Date	Comments
<b>UTILITIES AND SERVICES SYSTEMS</b>					
<p><b>Mitigation 3.3.3.2.a.</b> The following implementation measure shall be added to the Water Resources Element to ensure that water supply and availability is fully characterized within each watershed where such information is not adequately known:</p> <p><i><b>WR-IMx. Water Supply Evaluation and Monitoring.</b></i> Conduct watershed level evaluations within two years after the adoption of the General Plan Update to <del>determine the</del> <u>ensure sufficient</u> long term surface and groundwater supply, including seasonal, average, dry year, and multiple dry year supplies, and beneficial uses of water <del>to determine an estimate of the quantity of water will be</del> available for <u>the level of</u> future development <u>described in the Revised Draft EIR for the GPU.</u> Work with water and wastewater related special districts, regulators, and other appropriate organizations to monitor watershed conditions.</p>	Long Range Planning	Study  Within 2 years of GPU adoption			