

SUPPLEMENTAL INFORMATION # 1

For Planning Commission Agenda of:
December 7, 2017

☐	Consent Agenda Item	}	
☐	Continued Hearing Item	}	
☐	Public Hearing Item	}	No. ____
☐	Department Report	}	
☐	Old Business	}	

Re: **Zoning Ordinance Amendments to Allow Improved Floors and Footpaths in Greenhouses on Prime Agricultural Soils**

Ordinance Number 17-005

Case Number/s

Assessor's Parcel Number (APNs)

Address/location or project: Unincorporated Humboldt County

Attached for the Planning Commission's record and review are the following supplementary information items:

1. Letter from Food Fiber and Flowers of June 10, 2016 regarding classification of prime agricultural soils, and resultant under-recognition.
2. Notification of CEQA compliance (Negative Declaration) from State Clearinghouse.



Humboldt County Board of Supervisors
825 5th St.
Eureka, CA.

June 10, 2016

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

Dear Supervisors,

About 1981 the Soil Conservation Service (now USDA-NRCS) developed the Land Evaluation and Site Assessment (LESA) system as a tool for land-use decisions. Since that time numerous States and local jurisdictions have adopted the LESA system as a basis for evaluating the relative importance of agricultural lands within their jurisdiction. We provide two comprehensive references regarding the development of the Land Evaluation and Site Assessment system, also known as the LESA Model.

First is the LESA Guidebook prepared for the U.S. Department of Agriculture's Natural Resources Conservation Service by James R. Pease and Robert E. Coughlin. Originally published by the Soil and Water Conservation Society, 7515 Northeast Ankeny Road, Ankeny, Iowa 50021, this document is available on line.

Second is A Decade with LESA-The Evolution of Land Evaluation and Site Assessment. It is edited by Frederick R. Steiner, James R. Pease and Robert E. Coughlin. The publisher is also the Soil and Water Conservation Society. This reference is available in hard copy.

It is clear from both these references that LESA was never intended to be a "one size fits all" evaluation system. Just the opposite, States and local jurisdictions were expected to adapt and modify the model to the geography, climate and agricultural uses within their jurisdiction. Many have done so. Attachment #1 are the Introduction and Overview sections of the LESA Guidebook with the following quote from page 5.

"The Guidebook builds on the LESA experiences of state and local governments over the past dozen years and on a number of research studies of LESA systems. It addresses the range of topics a state or local government committee will encounter in developing a local LESA system, beginning with the question of whether a LESA system is needed or not."

Unfortunately some planning consultants in Humboldt County have been using the state LESA Model, including within the General Plan Update, without benefit of any local process or any adaptation of the model to the geography, climate and

agricultural uses within Humboldt County. Humboldt County agricultural lands are being evaluated based on standards more suitable to the San Joaquin Valley an apples and oranges approach. Very few Humboldt County properties would rank well in this system because our parcels are generally smaller, often not surrounded ¼ mile by other agricultural lands or protected lands and non-irrigated production systems are common.

A good example is the College of the Redwoods student farm in Shively, certainly one of the most fertile and productive properties in Humboldt County which has been recognized by the county as “prime agricultural land” for decades. However the student farm would receive low ranks for Site Assessment in the state LESA Model because it is only 40 acres, adjoins other agricultural land on only two sides and has no irrigation system. Attachment #2 provides a further detailed discussion of the LESA Model being wrongly applied in Humboldt County.

This leads to a further issue.

Humboldt County receives on average 60” of annual rainfall. Other North Coast counties range from 30” annual rainfall to upward of 60”. Many crops such as forage, commodities such as corn or wheat and row crops like tomatoes and melons are raised without irrigation. However NRCS California as well as the Important Farmland Mapping and Monitoring Project (IFMMP) will only classify irrigated land as “Prime Farmland”. This makes some sense in the desert regions of California but is wrongly applied in Humboldt County. Never the less, some planning consultants are using this criteria to downgrade Humboldt agricultural lands for planning purposes. Attachments #3 and #4 are the NRCS national definition of “Prime Farmland” and the Oregon definition of “Prime Farmland”. They both require only that prime farmland have “an adequate and dependable water supply from precipitation or irrigation”.

A modern USDA-NRCS soils survey has been underway in Humboldt County for nearly 20 years but is not yet complete. Information is available for some areas but the reconciliation process conducted by NRCS to resolve inconsistencies has not begun. Humboldt County is not included within the Important Farmland Mapping and Monitoring Program referenced in the LESA Model or within CEQA.

As the new USDA-NRCS soils information has developed the Humboldt County Farm Bureau has tried repeatedly to get our NRCS District Conservationist to address the irrigation problem. There has been no progress and no resolution of this issue. Both local planning consultants and USDA-NRCS continue to degrade some of Humboldt County's best farmlands because they do not have pumped irrigation.

The Storie Index Rating and the USDA Land Capability Classification Rating have been used to identify important agricultural lands in Humboldt County since 1965. The “prime agricultural soils” and “agricultural soils” layers in the County Web GIS system are based on the 1965 soil survey Soils of Western Humboldt County by McLaughlin and Harradine and a document produced by the Soil Conservation Service (now (USDA-NRCS) which converted the field work from Soils of Western Humboldt County to the Land Capability Classification System in preparation for the 1984 Framework Plan. These early documents cover many important agricultural areas but are recognized to be incomplete and cover less than 5% of the

total land area of the County. A modern USDA-NRCS soils survey has been underway in Humboldt County for nearly 20 years but is not yet complete. There is nothing fundamentally wrong with the Soils Evaluation contained in the new NRCS soil survey which covers the entire county. But Humboldt County's best agricultural lands are being degraded by definitions and the LESA Model inappropriately applied to the geography and climate of the county.

Until these issues can be resolved through a public stakeholder process, the LESA Model as well as the irrigation requirement for "Prime Farmland" should not be considered for planning purposes in Humboldt County.

John LaBoyteaux
Food, Fibre and Flowers

CC

Humboldt County Planning Commission
Rob Wall, Humboldt County Planning Director
Senior Planner Steve Werner
Senior Planner Michael Richardson
Humboldt County Farm Bureau
California Farm Bureau Federation, John Gamper
California Department of Conservatiion
Carlos Suarez, NRCS State Conservationist
Jon Schultz, NRCS District Conservationist
Humboldt County Resource Conservation District
Humboldt County Agricultural Commissioner



EDMUND G. BROWN JR.
GOVERNOR

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



KEN ALEX
DIRECTOR

November 16, 2017



Mary Milner
Humboldt County
3015 H Street
Eureka, CA 95501

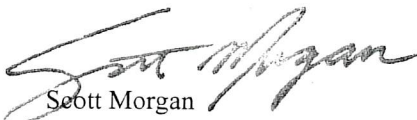
Subject: Initial Study/Negative Declaration - Zoning Ordinance Amendments to Allow Improved Floors & Footpaths in Gre
SCH#: 2017102024

Dear Mary Milner:

The State Clearinghouse submitted the above named Negative Declaration to selected state agencies for review. The review period closed on November 15, 2017, and no state agencies submitted comments by that date. 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 call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,


Scott Morgan
Director, State Clearinghouse

**Document Details Report
State Clearinghouse Data Base**

SCH# 2017102024
Project Title Initial Study/Negative Declaration - Zoning Ordinance Amendments to Allow Improved Floors &
Lead Agency Footpaths in Gre
Humboldt County

Type Neg Negative Declaration
Description Note: Review Per Lead

Amend county zoning ordinance to allow floors and footpaths in greenhouses on prime ag soils,
subject to special permit, construction criteria, and performance bond.

Lead Agency Contact

Name Mary Milner
Agency Humboldt County
Phone 707-268-3772 **Fax**
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
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Proximity to:

Highways
Airports
Railways
Waterways
Schools
Land Use

Project Issues Agricultural Land; Air Quality; Geologic/Seismic

Reviewing Agencies Resources Agency; California Coastal Commission; Department of Conservation; Department of Fish and Wildlife, Region 1E; Office of Historic Preservation; 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 10/06/2017 **Start of Review** 10/06/2017 **End of Review** 11/15/2017