

Stephen Avis and Jennifer Raynmod
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April 12, 2022

Steven Lazar, Senior Planner
Planning and Building Department (electronically)
H Street
Eureka CA 95501

RE: Comments on the Proposed Amendments to the Conditional Use Permit Authorizing
Motorsports and Concert Events at the Humboldt County Fairgrounds.

County of Humboldt Planning Commissioners:

You are being asked to approve an increase of allowable noise levels for flat track motorcycle races at the county fairgrounds in Ferndale. The requested increase, from 90 to 99dB, would allow the noise produced by each motorcycle to be nine times louder than allowed by the current Conditional Use Permit. Despite this significant increase, the Planning Department is failing to require additional noise studies to determine the impacts of this change.

By not requiring adequate noise studies, and not identifying appropriate mitigation measures, the County is failing to follow CEQA. Not only is this a disservice to the residents of Ferndale, it is also a serious disservice to the Humboldt County Fair Association.

The role of the Lead Agency is to collect sufficient data so that it can responsibly guide the applicant to a successful project. The HCFA needs reliable factual data to know what mitigation measures will allow it to successfully pass the noise testing required by the CUP during race events. Without this information, and the assurance that motorcycle racing will meet established noise limits, race promoters have indicated that they will be unwilling to schedule professional races in Ferndale.

The staff report prepared by the Planning Department fails to provide adequate information to ensure compliance, and on this basis, should be rejected.

Respectfully,

Stephen Avis, AICP
Retired land use planner

Jennifer Raymond

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