



BOARD OF SUPERVISORS
COUNTY OF HUMBOLDT
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April 22, 2025

The Honorable Assembly Members Mark Gonzalez and Pacheco
California State Assembly
State Capitol
P.O. Box 942849
Sacramento, CA 94249

RE: Oppose Assembly Bill 770 – Redefinition of “Customary Maintenance” for Outdoor Advertising Structures

Dear Assembly Members Gonzalez and Pacheco,

On behalf of the County of Humboldt, we write to express our strong opposition to Assembly Bill 770, which proposes to significantly expand the definition of “customary maintenance” for outdoor advertising structures in a manner that undermines local authority, compromises public safety, and endangers the environmental and cultural resources we work diligently to protect.

Humboldt County is home to some of California’s most iconic landscapes, including redwood forests, coastal bluffs, and rural scenic corridors. Our land use policies and signage regulations are designed to preserve the character of these spaces and to reflect the values of our residents. AB 770 would circumvent this local planning authority by allowing billboard owners to engage in substantial structural changes—such as replacing support posts, internal bracing, and foundational elements—without triggering local review or permitting processes. These actions go far beyond routine maintenance and would, under current standards, be considered reconstruction or redevelopment subject to regulatory oversight.

The bill’s broad language also raises significant concerns about potential misuse. By permitting the use of expanded materials and structural reconfigurations without meaningful limits, AB 770 could facilitate digital structural expansions without local input or environmental analysis. The lack of safeguards invites exploitation and weakens the public’s ability to evaluate and respond to changes that affect our shared visual and natural environment.

Public safety is also at risk. Upgrading billboard structures from lighter wood materials to heavier steel or concrete components—especially in close proximity to roads—without requiring updated roadway safety analysis, engineering assessments, seismic review is deeply troubling. This level of unregulated construction poses unnecessary hazards to the public.

From an environmental perspective, the scope of activities allowed under this bill—including excavation, staging of heavy equipment, and new foundation work—clearly exceeds what any reasonable interpretation of “maintenance” would permit. These activities can lead to erosion, habitat degradation, and impacts to sensitive ecosystems, including riparian corridors, coastal zones, and wetlands that are prevalent throughout our county. Additionally, the potential for disturbance to cultural and archaeological resources, particularly those significant to local tribal nations, is unacceptable. By reclassifying these activities as maintenance, AB 770 sidesteps the review and consultation processes mandated by CEQA and other protective frameworks.

Furthermore, many billboard structures in Humboldt County are located adjacent to or within view of public lands, including scenic byways, recreational areas, and wildlife refuges. AB 770 could allow for reorientation or repositioning of these structures without any requirement for survey, environmental analysis, or public transparency—creating the potential for further encroachment onto public resources and a diminished quality of life for our residents.

Ultimately, this bill prioritizes private commercial interests over public oversight, environmental stewardship, and local governance. It erodes the ability of counties like Humboldt to uphold the planning principles and values that our communities have worked hard to establish. We urge you to oppose AB 770 and preserve the integrity of local authority, public safety, and environmental protections.

Thank you for your consideration of our concerns.

Sincerely,

Michelle Bushnell, Chair
Board of Supervisors
County of Humboldt

cc:

The Honorable Assemblymember Rogers
California State Assembly
State Capitol
P.O. Box 942849
Sacramento, CA 94249

Honorable Senator Mike McGuire
1021 O Street, Suite 8518
Sacramento, CA 95814

Secretary Wade Crowfoot
California's Natural Resources
715 P Street, 20th Floor
Sacramento, CA 95814

California State Lands Commission
100 Howe Avenue, Suite 100 South
Sacramento, CA 95825

California State Association of Counties
1100 K Street
Sacramento, CA 95814

Rural County Representatives of California
1215 K Street, Suite 1650
Sacramento, CA 95814

Caltrans District 1
1656 Union Street
Eureka, CA 95501

California Coastal Commission
45 Fremont Street
San Francisco, CA 94105

California Department of Fish and Wildlife – Northern Region
619 2nd Street
Eureka, CA 95501

United States Fish and Wildlife – Arcata Office
1655 Heindon Road
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