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May 2, 2022

VIA ELECTRONIC MAIL

Mr. Steven Lazar, Senior Planner
County of Humboldt
315 H Street
Eureka, CA 95501



RE: Proposed Amendments to Conditional Permit for Motorcycle Races and Concerts at the Humboldt County Fairgrounds.

Humboldt County Planning Commissioners:

In my 40 years of public service in California, I have had the privilege of serving in the capacities of County Planner, City Planning Commissioner, City Council Member, City Manager, County Administrative Officer, Management Consultant for Cities and Counties and Registered Legislative Advocate for Public Agencies. I have probably participated in more than 500 public hearing during that time when my lead agency was required to adhere to the requirements of the California Environmental Quality Act (CEQA).

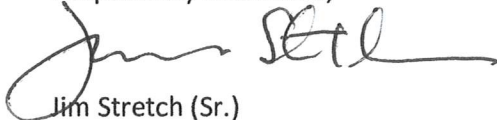
There are duties required by CEQA for the protection of the community, the environment and also for an applicant who may be subject to challenges as the result of an inadequate CEQA process. Though in my experience this is rare, I believe this CUP recommendation will be the exception and will be very problematic.

In the request before you, a mitigated negative declaration for an amendment to a conditional permit (CUP) to allow for the increase of motorcycle racing/concert noise nine-fold, in a residential neighborhood immediately adjacent to events, cannot truly be argued as anything but significant. As with the original permit, the proposal to increase the noise limitation in the permit is not empirically supported, and thus, cannot with authority be determined to be adequate.

Neighbors who felt that the original County CUP process was tender to challenge, decided to stand down because of the 90-decibel noise limitation granted as a condition of the permit—and now a doubling down by the lead agency for a use nine-times louder! I hesitate to say that the recommendation to your Planning Commission in this case, if adopted, is clearly contrary to the requirements of CEQA and cannot stand.

Finally, the issue with the amendment to a CUP is not presented by the applicant, it is the lead public agency not following the requirements of CEQA-to the detriment of the applicant. Only after a full environmental review is completed will the County be able to determine whether it can make the necessary findings to approve the proposed CUP amendment. Please require it.

Respectfully submitted,



Jim Stretch (Sr.)