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March 21, 2019

Mr. Robert E. Morris, Commissioner
Humboldt County Planning Commission

Dear Chairman Morris,

Director Ford's Memorandum - Update Friends of the Dunes Coastal Development Permit Modification (Barr) is deeply disturbing. He is usurping your power and imposing his will on the direction of the Friends of the Dunes' permitting process.

Ford's memorandum states, "At the October 4, 2018 meeting, ... The Commission directed staff to complete an Environmental Analysis for the project. ..." I reviewed the video of that meeting and three hours and 54 minutes into the video you (Morris) asked Director Ford to provide an **Initial Study** regarding Friends of the Dunes to help the commissioners decide whether FOD's CDP Application will need an EIR or a Mitigated Negative Declaration. You specified what information is to be included in the study and required the study to look beyond the Barr property and include an examination of FOD's long range possibilities / ultimate plan. Additionally the concerns of the neighbors are to be addressed in the Initial Study. When Director Ford suggested language for motion he used the words "Environmental Analysis " **in lieu of your request for an "Initial Study"**.

Since that October meeting:

On his own, Director Ford has reduced the scope of the review from FOD's ultimate plan to just the Barr property.

Director Ford ignored your desire to have "citizens' concerns" considered in the Initial Study. Staff is already revising a CQUA document (**what document?**) to include additional (**unspecified**) environmental impacts.

On his own, Director Ford relocated consideration of "citizen's concerns" from the Initial Study phase to the comment phase.

Additionally, planning staff is already working with FOD to augment their Restoration Plan to include **only** the Barr property. The planning staff should be helping FOD to update their existing plan which is nine years out of date. Augmentation should *wait* until the commission determines the type of environmental review FOD's permit application will need and what, if any, new conditions of approval are imposed.

Thank goodness you requested an update. Please schedule frequent public updates on this process.

If you concur with my observations direct Ford to start over and prepare an Initial Study as outlined by you, Commissioner Morris at the October 4, 2018 hearing.

Sincerely,
