

August 30, 2020

Humboldt County Planning Dept.
3015 H Street
Eureka, California 95501

Attn: Steve Lazar

Re: Humboldt County
Fair CEQA permit

Dear Mr. Lazaar:

I would like to take this time to recommend the approval of this permit for the Humboldt County Fair. As a current board member, I know the time and money that has been expended in meeting the requirements for this permit.

The Humboldt County Fair would like to have the opportunity to host some entertainment for the community. The HCF Board has worked diligently toward obtaining this permit over the past two years.

The HCF brings over 9 million dollars into our economy and is the largest event held in the County. The Fair Board works all year around in planning this event. The Fair includes the Jr. Livestock Auction, horseracing, local and professional entertainment, exhibits and the carnival. Over 50,000 people attend this event every year. Both the local merchants and the community merchants benefit from the Fair.

Due to the pandemic, the Humboldt County Fair was not able to put on a Fair this year and it is very important that they can sustain through interim activities such as concerts and other events.

We look forward to your approval of our permit.

Sincerely,

Clare Bugenig, Board member Humboldt County Fair

28 August 2020

Mr. Steve Lazar, Planner
3015 H St.
Eureka, Ca 95501

Re: SCH #2020070478

Dear Mr. Lazar:

Concerning Ferndale Fair Board's plans to use County property for motor sports, the County Planning Commission must require a thorough - absolutely comprehensive - acoustical Environmental Impact Report. The Report must rigorously explore the considerable effects of such activities on the entire town not just the neighborhoods immediately adjacent to the racetrack.

The hills above Ferndale at the south end of Main Street act acoustically as a concert shell (as at Hollywood Bowl) which magnifies and intensifies sound waves, redirecting increased high decibel noise back across the whole community, i.e., all of the homes and businesses in Ferndale.

Large raucous motor sport events generating drone-like noise during day-light hours and well into the evening will rob the community of a right to peace and quiet. The County Fair Board has brought economic disaster upon itself. Ferndale's citizens are under no obligation to pay dearly for the Board's failures.

Yours sincerely,

Jere Bob & Carol Bowden

866 Arlington Avenue
P.O. **Box 1244**
Ferndale, CA 95536
707-786-4434

From: [Brandi Zanone](#)
To: [Planning Clerk](#); [Lazar, Steve](#)
Subject: Regarding HCFA/PLN-2019-15519-CEQA permit
Date: Wednesday, September 2, 2020 6:31:42 PM

Humboldt County Planning Dept.
Eureka, California

Attn: Planning Clerk

Re: CEQA permit-Humboldt County Fair

I am writing this letter in support of the CEQA permit applied by the Humboldt County Fair.

I believe that bringing entertainment and concerts to our Fairgrounds will help with the much needed revenue to local businesses and to the Humboldt County Fair due to this COVID pandemic.

I live a couple blocks from the Fairgrounds and feel that the sound really isn't going to be any different from listening to the music play from carnival rides or the cheering of the horse races. I appreciate that they are looking into different entertainment for all ages. I think 20 years ago I even attended a concert and the Humboldt County Fair and really enjoyed it. I built my home here in Ferndale 22 years ago and knew that living close to Fairgrounds that are many different things that happen at the fairgrounds like Ice skating, Humboldt County Fair, Craft fairs, dog shows, Rodeos and many other activities. I feel truly lucky to live so close to a place that offers so many different things for young and old and the variety of entertainment that they offer. Most people that I have spoken to that live close to the fairgrounds are in favor of this permit. I hope that you approve this permit and help our town during these tough times.

Thank you,
Brandi Zanone
730 5th Street
Ferndale CA 95536

Public Comment for September 3, 2020 Planning Commission meeting. Public Hearing.
Public Hearing – Item 1

Humboldt County Fair Association, Conditional Use Permit
Case Number PLN-2019-15519

Unfortunately, this application is not the result of a collaboration between the residents of Humboldt County, the Ferndale Community, County Planning Staff and the Humboldt County Fair Association. That is too bad because the fairgrounds and its use is a matter of public interest, even if the operation is managed by a private nonprofit.

The project before you is not simply to expand an array of similar uses at the County Fairgrounds. You are being asked to fundamentally change the very character of how the fairground in Ferndale is used. The introduction of motorized racing events will result in noise levels comparable to what residents near Redwood Acres have endured for years and could initiate an ever-expanding array of noise generating events that will impact the lives of many people who treasure Ferndale's quiet small-town character.

There is no question that the Humboldt County Fair has fallen on hard times. Horse racing is in slow decline, fair attendance is leveling off and the fair buildings have been neglected and are not ADA compliant. Seven years ago, the Fair Association had fiscal reserves of half a million dollars. A reserve of five hundred thousand dollars to see them through lean years, and then be rebuilt in better years. Sadly, those reserves were all spent while financial records for board members were often months late and sometimes incorrect. Even before the Coronavirus pandemic, the fair bank accounts were near zero. Now staff has been laid off and large events like the county fair are on hold. Happily, the HCFA received \$100,000 in COVID-19 relief funds in April and just received \$175,000 from the State of California Department of Fairs and Expositions.

I would like to address two aspects of the Initial Study and Mitigated Negative Declaration you are being asked to adopt prior to approving the use permit.

1. This is a gateway project. It will introduce a new level of use at the fairgrounds that generates significant impacts. Once established future commissions may be asked to approve expansions in frequency or intensity of motorsports. Once a historic record of racing activities is established, future CEQA review will be minimal or covered by a categorical exemption. So, this is your one chance to fully grasp and comprehend the significance of what is being sought now and into the future.
2. A Negative Declaration is a legal document that certifies that a project will not have any significant impacts to the environment, including noise.

If a project may have significant impacts, all of the impacts must be fully disclosed through the Initial Study. If and only if all of the impacts can be reduced through

mitigation measures or conditions of approval so that no significant impacts remain, can a mitigated negative declaration be adopted.

This initial Study fails to disclose impacts that could result from tractor pulls, 4x4 events, go cart races and monster trucks. These activities are included in the Project Description and assumed to be activities approved through the use permit. There is absolutely no question that significant impacts will be generated by these activities and according to CEQA these must be evaluated through the environmental review process. In order to submit a Mitigated Negative Declaration, the County must demonstrate that all significant impacts can be reduced through mitigation or can be an exception to noise standards. Regardless, full disclosure, studies and a review of the data with identified measures to reduce impacts to a level of insignificance or allow an exception to the impact must precede the preparation of a negative declaration.

Further, the noise studies for flat track motorcycle races and outdoor concerts state that with proposed migration levels in place, the noise can be reduced to a level that the General Plan lists as “typically unacceptable”. Without additional proven mitigation measures these two activities will have significant impacts.

Therefore, this initial study of the project is incomplete and does not qualify under CEQA for a mitigated negative declaration. CEQA Guidelines clearly state that when a project could cause significant impacts, an environmental impact report must be prepared.

Before proceeding, you should have access to relevant data for all of the activities under consideration. Because of the long-term significant change in the environment that will be generated by the introduction of motorsports, an EIR is needed. This is too big of a change to brush past with an ill prepared initial study.

3. The third matter relates the County’s convoluted attempt to exclude monster trucks from a CEQA review process. One letter writer calls this effort “tortured reasoning”. There is an exception that allows temporary noise generated under a use permit to exceed the normal permitted levels for exterior measurements. There is no such exception for interior noise measurements.

The premise goes that because an exception exists, and because monster truck events are “temporary”, their use under the use permit is exempt from CEQA review. This is an incorrect assertion. As stated earlier, all significant impacts must be disclosed before setting guidelines and mitigation measures for each in an effort to reduce them.

By the reasoning conjured by staff, all of the events would qualify as temporary and qualify for an exception. To pick one is arbitrary, capricious, contrary to planning practice and unlawful.

Stephen Avis, AICP
Ferndale