

Attachment 5 - Public Comments

From: [Wendy Ring](#)
To: LongRangePlanning@co.humboldt.ca.us
Subject: Humboldt Bay Area Plan
Date: Saturday, June 13, 2026 2:06:17 PM

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Consider creating a [Climate Resilience District](#) to aid in funding climate adaptation efforts. At a minimum, please bite the bullet and ban new construction and reconstruction in former tidelands that are highly vulnerable to flooding and likely to revert to regular inundation within the next 100 years, unless they are genuine adaptation projects which are consistent with this prognosis. Retreat is politically unpopular and may not make it into this plan, but the plan should at least prevent more advance of investment and infrastructure into flood prone areas.

Wendy Ring



HBAP Comment - Alder Gustafson

From Alder Gustafson <redalderstudios@gmail.com>

Date Tue 6/30/2026 4:39 PM

To LongRangePlanning@co.humboldt.ca.us <longrangeplanning@co.humboldt.ca.us>

 1 attachment (75 KB)

HBAP Comment - Alder Gustafson.pdf;

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Greetings and thank you for the opportunity to comment on the HBAP Update Draft. I have attached my comment as a pdf below.

Best,
Alder Gustafson

Comment on Humboldt Bay Area Plan Update – Samoa, CA

Thank you for the opportunity to comment on the Humboldt Bay Area Plan update. As a Samoa resident and homeowner, I recognize that Humboldt Bay—and Samoa in particular—is entering a period of significant transition driven by offshore wind development, housing demand, redevelopment of former industrial lands, and climate change. These changes present real opportunities for economic and community benefit, but they also require a more explicit and enforceable framework for infrastructure, safety, and community impacts than is currently reflected in the draft.

1. Cumulative Impacts & Infrastructure Capacity

My primary concern is that the Plan evaluates major projects in isolation rather than addressing their combined, long-term impacts on Samoa as a small, geographically constrained peninsula with a single primary transportation connection to the mainland.

The combined buildout of:

- Danco housing developments
- Samoa Town redevelopment
- Heavy Lift Marine Terminal
- Expanded port activity
- Additional residential and commercial growth

will collectively reshape Samoa over the next several decades.

Request: Cumulative Infrastructure Analysis

The Plan should include a **cumulative infrastructure and capacity analysis for Samoa under full buildout conditions**, including:

- Transportation and circulation
- Water and wastewater systems
- Stormwater and drainage capacity
- Emergency response services
- Schools and community facilities
- Utilities and energy infrastructure
- Parks, recreation, and public amenities

Infrastructure improvements should be identified, funded, and phased **in advance of development impacts**, not after thresholds are exceeded.

2. Tsunami Evacuation Capacity & Long-Term Resilience Planning

Samoa's geography creates a unique vulnerability because nearly all residents, workers, and visitors must evacuate locally to high ground within the peninsula during a tsunami event.

As development increases, safety will depend on whether **internal evacuation routes, travel times, and high-ground capacity remain adequate under full buildout conditions.**

Evacuation Capacity Requirements

The Plan should require evacuation modeling based on full buildout conditions, including:

- Peak residential population
- Peak industrial employment
- Peak recreational and visitor use

This modeling should evaluate whether existing and planned routes can support timely evacuation to designated safe high ground areas within Samoa.

The County should also establish **clear performance standards for maximum evacuation times**, and specify how those standards will be maintained as growth occurs.

Tsunami Resilience Infrastructure

The Plan should provide a clear implementation strategy for long-term tsunami resilience, including:

- Identification of potential vertical evacuation structure locations
- Funding strategies and implementation timelines
- Responsible agencies and partners
- Capacity designed for projected future population, not existing conditions
- Consideration of earthquake scenarios that may limit internal mobility or access

3. Heavy Lift Marine Terminal & Industrial Impacts

The Heavy Lift Marine Terminal represents a major transformation of the Samoa Peninsula. While offshore wind development is an important regional opportunity, the scale of this project requires clear protections for adjacent residential areas.

Request: Enforceable Operational Standards

The Plan should establish measurable standards for:

- Lighting impacts (including night sky protection)
- Air quality and emissions
- Noise and vibration
- Heavy truck traffic and routing
- Construction staging and duration
- Dust control
- Visual and scenic impacts

Where possible, these should be defined as **quantitative or enforceable standards**, not deferred solely to future project-level review.

4. Truck Traffic & Transportation Impacts

Truck traffic from industrial development and housing buildout will be one of the most significant cumulative impacts.

Request:

- Model full buildout heavy truck volumes
- Identify roadway and intersection upgrades in advance
- Incorporate pedestrian and bicycle safety improvements
- Establish routing and traffic management strategies early

5. Housing, Workforce Needs, and Community Stability

I support expanding housing in Samoa given Humboldt County's housing shortage. However, housing policy should prioritize:

- Local residents and workforce needs
- Long-term occupancy over temporary construction housing
- Owner-occupied housing
- Reduced reliance on short-term rentals or second homes

Housing growth should support **community stability and livability**, not only unit production.

6. Samoa as an Existing Community (Not a Blank Slate)

Samoa is not an undeveloped planning area—it is an established residential community.

Existing residents will experience the impacts of growth long before many of the benefits are realized. This reality should be explicitly reflected in how the Plan sequences infrastructure and development.

7. Community Benefits First & Implementation Sequencing

Long-standing community improvements in Samoa—including sidewalks, streets, trails, parks, public spaces, and a walkable town center—remain incomplete and should be treated as core infrastructure.

Request: Community Benefits First Policy

The Plan should adopt a “**community benefits first**” approach, requiring that major development phases be tied to delivery of public infrastructure such as:

- Transportation and circulation improvements
- Pedestrian and bicycle networks
- Parks, trails, and public spaces
- Evacuation and safety infrastructure
- Neighborhood-serving commercial amenities

Implementation Requirement

These improvements should be:

- Phased alongside development
- Tied to enforceable milestones
- Required prior to or concurrent with later development phases

Implementation Rationale

Sequencing improvements early strengthens project success. When residents see tangible benefits early in the process, it:

- Builds trust in the planning process
- Reduces uncertainty and opposition
- Increases support for future phases
- Ensures development is perceived as a shared investment

8. Historic Character & Community Identity

Samoa's historic character is a defining community asset.

New development should:

- Complement historic townsite patterns
- Use compatible scale and architectural design
- Preserve significant structures
- Protect key view corridors
- Strengthen pedestrian-oriented design

Growth should enhance, not erase, community identity.

9. Sea Level Rise, Insurance, and Long-Term Resilience

Beyond physical hazards, long-term climate impacts may affect:

- Insurance availability and cost
- Homeowner financial stability
- Property values and investment confidence

Request:

The County should:

- Coordinate with insurers and state agencies
- Monitor insurance availability trends
- Prioritize adaptation projects that reduce long-term risk
- Clearly communicate long-term resilience strategies to residents

Community resilience should include both **physical safety and financial viability**.

10. Public Access & Recreation

Public access to beaches, trails, and Humboldt Bay should remain a priority as Samoa grows.

The Plan should include commitments to:

- Expand parking where appropriate
- Improve trail connectivity
- Preserve shoreline access
- Strengthen pedestrian and bicycle infrastructure

11. Local Economic Participation

Public investment in offshore wind and redevelopment should provide lasting benefits to Humboldt County residents through:

- Workforce development programs
- Apprenticeships
- Partnerships with local educational institutions
- Local hiring commitments where feasible

Conclusion

I support the vision of a revitalized Samoa. My concern is not growth itself, but ensuring that infrastructure, safety systems, environmental resilience, and community character grow in step with development.

Samoa is already a community worth investing in. The success of this Plan should be measured not only by housing units or jobs created, but by whether existing residents experience a safer, more connected, and more livable community.

I respectfully request that the Humboldt Bay Area Plan include:

- Cumulative impact analysis
- Full infrastructure capacity planning
- Clear evacuation and resilience standards
- Enforceable implementation milestones
- Phased community benefit requirements

so that future development proceeds in a way that protects both public safety and the long-term livability of Samoa.

Thank you for your time and commitment to serving Humboldt County and the Humboldt Bay Area,

Respectfully,
Alder Gustafson



Re: Somoa Resident Commets

From Amy Kumler <amykumlerphoto@gmail.com>

Date Mon 6/29/2026 6:05 PM

To LongRangePlanning@co.humboldt.ca.us <longrangeplanning@co.humboldt.ca.us>; Amy Kumler <amykumlerphoto@gmail.com>

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I realized that I included an unnecessary paragraph that I intended to remove.

I apologize for any confusion this may have caused. Please let me know if you have any questions.

Kindest,
Amy Kumler

AMY KUMLER
photographer
C: +707.223.1455
E: amykumlerphoto@gmail.com
W: www.amykumler.com
IG: www.instagram.com/amykumler/

"There is no business to be done on a dead planet."
-David Brower

On Mon, Jun 29, 2026 at 5:55 PM Amy Kumler <amykumlerphoto@gmail.com> wrote:

Please read the attached pdf . If you can not open this attachment please let me know.

Kindest,

AMY KUMLER

As a homeowner in Samoa, I am deeply concerned about the long-term impacts that the proposed Local Coastal Plan Update could have on our community. I believe the County has a responsibility to protect the health, safety, and quality of life of Samoa residents while ensuring that development is carefully monitored and held to existing standards.

I am also deeply concerned about how these proposed changes could affect the value of my home and the investment my family has made in this community. I paid approximately \$500,000 for my home based on the land use designations and vision presented in the Samoa Master Plan that was in place when I purchased it. I relied on those plans when making one of the largest financial investments of my life. If the County significantly changes the character of Samoa after homeowners have purchased their properties, it has the potential to diminish property values and undermine the expectations of those who invested here in good faith.

Beyond the financial impact, I am equally concerned about the environmental consequences of expanding industrial activity in Samoa. Increased noise, bright lighting, and around-the-clock operations will not only affect residents but also the wildlife that makes Humboldt Bay such a unique and beautiful place. What will happen to the bald eagles, ospreys, pelicans, and the orcas that regularly enter the harbor? These animals depend on a healthy and relatively undisturbed environment. Before moving forward with these changes, I believe the County should fully evaluate how increased light, noise, and industrial activity will affect both wildlife and the natural environment.

One of my biggest concerns is the proposed Port Overlay Zone described in Section 3.13.12 of the updated plan. As I understand it, this overlay could allow changes to important standards for noise, lighting, and vibration associated with the Humboldt Bay Marine Terminal project. I respectfully request that this proposal be tabled until there has been a full public discussion and, preferably, until the Environmental Impact Report (EIR) for the terminal project has been completed. Residents deserve to fully understand the potential impacts before these changes are considered. I am also concerned that this proposal could shift decisions regarding these standards away from existing protections.

I am also asking for a clear explanation of how the proposed land use designations differ from the plans that were in place when I purchased my home, including the 2007 Design Guidelines for Old Town Samoa, the 2018 Samoa Town Master Plan Land Use and Zoning and Phasing Map, and the 2019 Samoa Master Plan. In particular, I would like clarification regarding any proposed zoning changes affecting the area identified in those plans as the "Samoa Block and Town Square."

I am also concerned about proposals for additional housing that may not be consistent with the vision that attracted many of us to Samoa in the first place. Any future housing should be thoughtfully planned so that it fits with the existing community, protects property values, and is supported by adequate infrastructure, public safety, and community services. Future growth should strengthen the community while preserving the unique character that homeowners relied upon when deciding to make Samoa their home.

Transparency is essential. Residents deserve to know exactly what has changed, why those changes are being proposed, and how they will affect our homes, our community, and our future. The County should provide straightforward comparisons between the previous plans and the proposed updates so the public can make informed comments.

For those who would like more information, the Humboldt County Local Coastal Plan Update website includes the HBAP Public Draft as well as the "Humboldt Bay Harbor Recreation and Conservation Standards Letter." That letter outlines several requests by the Harbor District to deviate from existing standards. For example, the current noise standard generally limits sound to five decibels above ambient levels at neighboring residences, yet the Harbor District has acknowledged that it is unlikely the proposed project can meet that requirement. This makes it even more important that these issues receive careful public review before any standards are changed.

I respectfully ask the County to carefully consider the voices of the residents who have invested in this community and who will be the ones living with the consequences of these decisions long after the projects are completed. Development should not come at the expense of our homes, our environment, our wildlife, or the unique character that has made Samoa such a special place to live.

Thank you for taking the time to consider my comments and concerns. I respectfully ask that these comments be included in the official public record and that the County carefully evaluate the potential impacts these proposed changes could have on existing residents before moving forward. I hope you will preserve the commitments that were made to homeowners, protect the environmental resources that make Humboldt Bay so special, and ensure that any future development is balanced, transparent, and in the best interests of the entire community.

Sincerely,

Amy Kumler
Samoa Homeowner



HBAP Modification - Public Comment Submission

From Brendan McGuire <brendan.mcguire@startmail.com>

Date Sun 6/28/2026 5:20 PM

To LongRangePlanning@co.humboldt.ca.us <longrangeplanning@co.humboldt.ca.us>

 1 attachment (333 KB)

HBAP Public Comment June 2026 - Brendan McGuire.pdf;

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Dear Humboldt County Long Range Planning Staff,

Please accept the attached letter as my formal public comment on the Public Draft June 2026 Humboldt Bay Area Plan, specifically regarding the Samoa Town Master Plan Land Use Plan (STMP-LUP) revisions.

My primary concerns are:

- The absence of Exhibit 25A from the public draft, which makes it impossible for residents to evaluate the location, size, and character of proposed land use changes in Samoa
- The need for a plain-language explanation of the Master Parcel 2/3 restructuring and its effect on development sequencing
- Clarification of how density bonus provisions interact with STMP design and character protections

I support thoughtful planning for Samoa and am not writing in opposition to development. I am writing because I cannot meaningfully evaluate these changes without the information identified in my attached comment.

I respectfully request that the County publish Exhibit 25A and extend the public comment period before advancing the Samoa-specific portions of this draft.

Thank you for your consideration.

Sincerely,
Brendan McGuire
Samoa Resident and Home

Brendan McGuire
161 Samoa Court
Samoa, CA 95564

June 28, 2026

Humboldt County Planning Staff

Planning Commissioners and Members of the Board of Supervisors

Re: Public Comment on HBAP Public Draft June 2026 — Samoa Town Master Plan / STMP-LUP Revisions

To Whom it May Concern,

I am writing as a resident and homeowner in Samoa to submit public comment on the Public Draft June 2026 Humboldt Bay Area Plan (HBAP), with particular attention to the sections governing the Town of Samoa and the Samoa Town Master Plan Land Use Plan overlay (STMP-LUP).

I support the County's effort to update the HBAP, and I value responsible planning for housing, infrastructure, environmental protection, and coastal safety. I also support the long-promised restoration of Samoa's historic homes and community. My comments are provided to seek a better understanding of the HBAP changes and their impact on the town of Samoa.

1. Exhibit 25A Is Missing from the Public Draft

The most fundamental problem with the Samoa/STMP-LUP sections of this draft is that the map central to interpreting them — Exhibit 25A — is not included in the publicly available PDF document. The map is vital to understanding the location of changes to determine their impacts.

The HBAP draft references Exhibit 25A repeatedly as the authoritative depiction of:

- The boundaries of the STMP-LUP Overlay Area
- The location and extent of Master Parcel 2 and Master Parcel 3
- The Residential Medium Density (RM) area, where multi-family development is a principal permitted use
- The Public Facilities (PF) area for wastewater treatment and disposal
- The Vance Avenue right-of-way and other key infrastructure corridors

Without Exhibit 25A, it is not possible to determine where the RM zone is located within the town, how large it is, what it is adjacent to, or how it relates to existing homes, the town center, or sensitive resources. The draft text identifies the RM area only as "on the east side of Vance Avenue south of Adams Court" (HBAP Ch. 3, Town of Samoa Urban Limit Line designations), which is insufficient for residents to assess the scale or character of what could be built there.

The RM designation in the HBAP permits duplexes, multiple family units, and mobile homes as principal uses, at a gross density of 8–30 units per acre (HBAP Ch. 4, RM designation standards). Without knowing the acreage of the RM parcel from Exhibit 25A, residents cannot begin to estimate the maximum potential unit count that this combination of zoning and state law could produce.

I respectfully request that the County:

- Publish Exhibit 25A as part of the public record immediately, in a format accessible to all residents

Brendan McGuire

161 Samoa Court
Samoa, CA 95564

- Extend the public comment period for the Samoa/STMP-LUP sections to allow meaningful review after Exhibit 25A is available
- Confirm the acreage of the RM-designated parcel and the maximum possible unit count under both base zoning and density bonus scenarios

2. The Revised Master Parcel Structure Requires Plain-Language Explanation

The 2026 draft appears to revise the previously certified STMP-LUP structure in a significant way: what was previously a single Master Parcel 2 is now resubdivided into two parcels — a new Master Parcel 2 (comprising the Public Facilities area, the Vance Avenue right-of-way, and the RM residential area) and a new Master Parcel 3 (all other STMP lands) (HBAP Ch. 4, STMP-LUP Parcel Merger provisions).

I do not yet know whether this change is technical or substantive. It may reasonably affect:

- The sequencing of development approvals
- The timing of required public benefits and infrastructure
- Whether wastewater improvements, Vance Avenue work, and RM residential development can proceed separately from other long-promised STMP obligations

The HBAP's STMP phasing policies require that public facilities be developed before new residential areas (HBAP Ch. 4, STMP New Development Policy 1, Phasing of Development). I support that requirement. But I cannot evaluate whether the revised parcel structure maintains or weakens that sequence without a plain-language explanation from County staff.

I respectfully request that the County provide:

- A plain-language explanation of what the Master Parcel 2/3 restructuring changes, and why
- A public meeting or workshop to explain the changes and answer questions from the public
- Confirmation that no existing STMP phasing obligation is weakened, delayed, or made easier to satisfy by the revised structure
- Clarification of whether residential development within the RM area could be approved or constructed ahead of other required STMP infrastructure and public benefits

3. Scale and Character of New Residential Development Must Be Clearly Defined

Samoa is a small historic company town. The existing homes and streetscape reflect a particular architectural scale and character. I support compatible housing, including affordable housing. However, the current draft does not provide enough specificity for me to assess the impacts of new residential development in the RM area.

The draft does reference the Design Guidelines for Old Samoa as a standard for new development within the STMP Overlay Area and requires that new construction preserve and extend Samoa's historic community character (HBAP Ch. 4, STMP Community Character/Visual Policy 1). I strongly support retaining those provisions. But without knowing the size of the RM parcel and without explicit design standards for multi-family structures, I cannot assess whether those policies are strong enough to prevent out-of-scale development.

Brendan McGuire

161 Samoa Court
Samoa, CA 95564

Before adoption, the County should clarify:

- Whether density bonuses or concessions under state law could reduce or override the Design Guidelines for Old Samoa or the STMP community character policies
- What height limits, setback requirements, and massing standards apply to new multi-family structures in the RM area
- Whether visual simulations will be required before any discretionary approval for new residential development in the STMP area

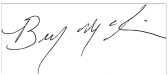
4. Summary of Requests

I respectfully ask the County to take the following steps before advancing the Samoa/STMP-LUP portions of the HBAP:

1. Publish Exhibit 25A immediately as part of the public draft and extend the comment period accordingly.
2. Provide a plain-language change matrix explaining each substantive Samoa/STMP-LUP revision in this draft, including who proposed it and what policy purpose it serves.
3. Disclose the acreage of the RM-designated parcel and the maximum potential unit count under base zoning and density bonus scenarios.
4. Confirm that the revised Master Parcel 2/3 structure does not weaken or delay any existing STMP phasing, public benefit, or infrastructure obligation.
5. Clarify whether density bonuses, concessions, or waivers under state law could override STMP design, character, or safety policies.
6. Hold at least one in-person public workshop in Samoa focused specifically on the Samoa/STMP-LUP revisions, at a time accessible to working residents.
7. Extend the public comment period to allow time to issue the requested information and public workshop.

Thank you for review of my comments and request for additional information to better understand the updates to the HBAP.

Sincerely,


box SIGN 1JP2ZK6L-4ZYWXQJV

Jun 28, 2026

Brendan McGuire

Samoa Resident and Homeowner

161 Samoa Court, Samoa, CA 95564

(808) 200-9634

brendan.mcguire@startmail.com



Public Comment on HBAP Draft

From Brianna King <briannaking513@gmail.com>

Date Mon 6/29/2026 10:28 PM

To LongRangePlanning@co.humboldt.ca.us <longrangeplanning@co.humboldt.ca.us>

 1 attachment (2 MB)

HBAP Public Draft June 2026.pdf;

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Dear Humboldt County Planning Staff, Planning Commissioners, and members of the Board of Supervisors,

I am writing as a resident of the Town of Samoa to express my concerns regarding the proposed changes outlined in the HBAP, specifically regarding the town of Samoa and the STMP.

Based on my understanding, the red text reflects revisions that appear to remove or weaken several longstanding protections for Samoa. Many of us chose to live here because of its quiet, slow-paced, and community-oriented character. Neighbors host gatherings and we look out for one another. We invested in this town because of its historic charm, walkability, and peaceful atmosphere. We're not rich; first time homeowners who were able to afford a small home near the beach, which is practically unheard of in California.

However, with Danco's recent increase in development activity—including the proposal to replace our community center with additional high-density housing—the character of Samoa is changing rapidly. The Samoa Block, a two-story historic structure that once served as the commercial and social center of town, is formally listed as a contributing resource within the historic district. In the 2007 *Design Guidelines for the Town of Samoa*, Gerald Takano recommended that “every effort should be made to reuse and revitalize contributing historic and cultural resources,” and further stated that “the County of Humboldt shall issue a demolition permit only if a permit for a replacement of a new structure is justified and secured.” However, it has sat empty, aside from the use to store the fire departments engines, for over a decade. Over time, this building has been allowed to slowly degrade, with the promises to the residents of Samoa being overridden by the pull of more housing development and another steady stream of income.

Given these guidelines, I respectfully request that demolition of the Samoa Block be considered only if the replacement structure fully reflects the original building's purpose, scale, and aesthetic. Restoration should have occurred when the building was still in good condition, as recommended during the town's transfer to Danco and documented in the CEQA materials. The HBAP draft also states: “Visual analysis shall include evidence that proposed buildout of the pertinent subdivision can be accommodated in a manner that does not adversely affect the historic community character of the existing Town of Samoa or

public coastal views to and along the coast and Humboldt Bay.” Replacing a historic town-center building with high-density housing fundamentally alters the town’s dynamic and erodes the very character these policies are meant to protect.

I ask that the residents of Samoa be considered when making substantial changes to the HBAP, as this significantly affects our day to day. It may not seem like much, but any protections we can get in regards to construction timelines, limits to noise and light, and limit to significant developments and the changing of the original STMP that we were sold on when we bought our homes would be greatly appreciated. If any further development of Samoa is proposed by Danco, I ask that they be required to finish the work they have promised us. This includes the installation of our new water and sewer lines; undergrounding of power lines; repaving off all roads; the construction of sidewalks; the construction of a grocery store (NOT a small 60-item store in the Cookhouse); the revitalization of the Samoa Block (putting in stores and a walkable area); the construction of walking paths; a new park; and the revitalization of the Samoa Cookhouse (preferably before it also rots and is knocked down for more housing).

Additionally, the HBAP addresses the proposed offshore wind energy project. Humboldt Bay contains one of the most productive and environmentally suitable areas for oyster farming, which is an already existing local industry. The project’s plan to dredge large portions of the bay to accommodate vessel access poses a serious risk to the environmental conditions that oyster cultivation depends on, and will also inevitably impact the environment of eel grass as well as the harbour seals in the area. Aside from the environmental concerns, and leaning back into the direct impacts on residents of Samoa, this project will undoubtedly change our town. Our homes already shake when any large Danco work is being performed, so considering that upwards of 4,000 piles are going to be driven over the course of 2-3 years is extremely concerning. I would ask that noise and light restrictions which were removed from this area be reinstated, as well as ensuring that all work stops at night. Any such impacts should be carefully evaluated and transparently addressed before moving forward.

Thank you for your attention to these concerns and for your commitment to preserving the unique character and environmental health of Samoa.



Outlook

Public Comment on HBAP Public Draft June 2026 — Samoa Town Master Plan / STMP-LUP Revisions

From Dave Jannetta <davejannetta@gmail.com>**Date** Fri 6/26/2026 4:30 PM**To** LongRangePlanning@co.humboldt.ca.us <longrangeplanning@co.humboldt.ca.us>**Cc** Arroyo, Natalie <narroyo@co.humboldt.ca.us>; Ford, John <JFord@co.humboldt.ca.us> 1 attachment (85 KB)

Jannetta, Dave - Public Comment on HBAP Draft June 2026.pdf;

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Dear Humboldt County Planning Staff, Planning Commissioners, and Members of the Board of Supervisors,

I am writing as a resident and homeowner in Samoa to provide public comment on the Public Draft June 2026 Humboldt Bay Area Plan, particularly the sections concerning the Town of Samoa and the Samoa Town Master Plan Land Use Plan overlay.

I appreciate the County's work to update the Humboldt Bay Area Plan and recognize the importance of planning for housing, coastal access, infrastructure, environmental protection, sea level rise, tsunami safety, and economic development. I also support the long-overdue restoration of Samoa's historic homes and infrastructure. Samoa has waited many years for promises in the Samoa Town Master Plan to be fulfilled.

However, I am deeply concerned that the Samoa-specific redline revisions appear to make significant substantive changes to the planning and development framework for Samoa without meaningful consultation with the people who live here. These changes should not be treated as technical cleanup. They directly affect the future form, scale, density, character, safety, and livability of our neighborhood.

My concerns are not opposition to housing or affordable housing. I believe Samoa can and should include housing opportunities for a range of income levels. My concern is that the current draft may allow large-scale, higher-density residential development in or near what residents understood to be the town center or civic heart of Samoa, without clear enough limits on scale, design, phasing, public benefits, parking, traffic, emergency evacuation, or compatibility with the historic company town. A smaller, well-designed, historically compatible affordable housing project may be appropriate. A large apartment-style complex that overwhelms the scale and character of Samoa would not be.

The Samoa sections should be revised, clarified, and re-circulated for meaningful community review before adoption.

1. The County should provide a Samoa-specific redline explanation and change matrix.

The STMP-LUP revisions are complex and difficult for residents to interpret. The draft appears to revise the master parcel structure, change references from Master Parcel 2 to Master Parcels

2 and 3, identify Master Parcel 2 as including the Public Facilities area, Vance Avenue right-of-way, and the Residential Medium Density area, and modify development sequencing and infrastructure requirements.

Before the County advances this draft, it should provide a plain-language change matrix for all Samoa/STMP-LUP revisions showing:

- what each substantive Samoa-specific change does;
- who requested or proposed the change;
- the policy reason for the change;
- whether the change affects development sequencing, density, phasing, public benefits, infrastructure, coastal access, historic preservation, or public review;
- whether the change facilitates a currently proposed development project;
- whether any obligation in the previously certified Samoa Town Master Plan is being weakened, delayed, removed, or made easier to satisfy; and
- whether Coastal Commission staff has reviewed or commented on the change.

Without this information, residents cannot meaningfully evaluate the effect of the draft.

2. The County should hold at least one Samoa-based public workshop before advancing the Samoa/STMP-LUP revisions.

The people most affected by these changes are the residents of Samoa. Many of us purchased homes here with an understanding of the town's historic character, scale, and master plan. We have also lived with delayed timelines and unmet expectations for restoration and infrastructure.

The County should hold at least one in-person public workshop in Samoa, at a time accessible to working residents, focused specifically on the Samoa/STMP-LUP revisions. This workshop should include County Planning staff, the landowner/developer, relevant service providers, and Coastal Commission staff if possible. The purpose should be to explain what is changing, what is not changing, and how residents' concerns will be incorporated before the draft is adopted.

3. The draft should not enable large, out-of-scale residential development in the town center or historic core.

The draft identifies a Residential Medium Density area in Samoa and also includes density bonus language that may allow density ranges to be exceeded for affordable housing. I support affordable housing in principle, but the County should ensure that any affordable or multifamily housing in Samoa is compatible with the historic character, infrastructure capacity, safety constraints, and small-scale coastal village form of the town.

The HBAP should be revised to make clear that any new multifamily or affordable housing in the STMP-LUP area must:

- be compatible with the scale, massing, roof forms, setbacks, streetscape, materials, and architectural rhythm of historic Samoa;
- not take the form of a large, generic apartment complex or monolithic block;
- preserve the function and identity of the town center as a public and civic gathering place;
- include meaningful transitions in scale between new residential development and existing historic homes;
- provide adequate parking and circulation without overwhelming existing streets;
- include visual simulations before approval;
- be reviewed at a noticed public hearing before any discretionary approval; and

- remain appealable where allowed by law.

If the County intends for the Residential Medium Density area to allow large apartment-style development, that should be stated clearly and openly now, not discovered later through project-level permitting.

4. The County should clarify how density bonuses, concessions, waivers, and incentives will apply in the Coastal Zone and within the STMP-LUP.

The draft refers to density bonuses for affordable housing and says density ranges may be exceeded under applicable law while remaining consistent with certified LCP policies and development standards. That is an important statement, but it is not enough.

The County should clarify:

- whether density bonuses may be used within the Samoa STMP-LUP area;
- the maximum possible unit count that could result in the Samoa RM area if density bonus provisions are applied;
- whether concessions, incentives, or waivers could be used to reduce design standards, height limits, parking standards, setbacks, open space, visual protections, or historic character requirements;
- whether any such concessions or waivers could override the Design Guidelines for Old Samoa or the STMP Community Character/Visual policies;
- how the County will determine whether a density increase would adversely affect coastal resources, public views, public safety, evacuation, or community character; and
- how residents will be notified and allowed to participate before any density bonus approval.

The County should add language stating that density bonuses and affordable housing incentives shall not be used to waive or weaken STMP-LUP policies protecting historic community character, public coastal views, tsunami safety, public access, ESHA/wetland protections, or required phasing and infrastructure obligations.

5. The STMP phasing requirements must remain enforceable and should not be bypassed.

The Samoa Town Master Plan has long included public benefits and sequencing requirements: restoration of existing structures, wastewater and water infrastructure, emergency services, pedestrian and bicycle paths, beach and dune access, low-cost visitor-serving accommodations, public amenities, and other improvements.

The County should make clear that new residential development may not proceed ahead of required infrastructure, public access improvements, old-town restoration, emergency services, wastewater capacity, tsunami safety planning, and long-term maintenance mechanisms.

If the revised Master Parcel 2 structure is intended to allow wastewater improvements, Vance Avenue improvements, and RM residential development to proceed separately or earlier than other STMP obligations, that should be plainly explained and justified. The County should not allow the most profitable or highest-priority private development pieces to move forward while long-promised public benefits, historic restoration, and community amenities are delayed.

6. Historic character protections should be strengthened, not merely retained.

The draft includes important language requiring development to preserve and protect Samoa's historic community character, and it incorporates the Design Guidelines for Old Samoa. I strongly support retaining and strengthening these provisions.

The final HBAP should make clear that:

- new construction in Samoa must be visually compatible with the historic company town;
- compatibility includes scale, massing, height, materials, rooflines, porches, fenestration, setbacks, landscaping, lighting, signage, and streetscape pattern;
- visual analysis are required for all substantial new development in the STMP-LUP area;
- design review should apply to large new residential projects, not only restoration of existing structures;
- public gathering places, including the Women's Club and town center area, must be protected from incompatible development; and
- exterior lighting, signage, and building massing must not degrade Samoa's historic character or coastal views.

The County should not adopt language that appears to protect historic Samoa while allowing new construction that fundamentally changes its character.

7. The County should analyze neighborhood impacts before adopting Samoa-specific changes.

The draft has direct implications for residents' daily lives. Before adoption, the County should analyze and disclose likely impacts to:

- traffic on Vance Avenue, New Navy Base Road, and internal Samoa streets;
- parking availability;
- emergency evacuation capacity, including tsunami evacuation;
- fire and emergency response;
- water and wastewater capacity;
- stormwater drainage and flooding;
- lighting and night-sky impacts;
- construction impacts;
- public access and visitor traffic;
- coastal views and views from existing homes and public gathering places;
- compatibility with existing historic homes;
- effects on the town center; and
- cumulative impacts from residential development, business park development, public facilities, coastal access improvements, and nearby industrial or port-related projects.

Samoa is geographically constrained. Residents are concerned about being boxed in by multiple large projects at once: new housing, business park development, wastewater facilities, public access improvements, offshore wind/port-related activity, and other infrastructure. These cumulative impacts should be addressed before the plan is adopted.

8. The County should pause adoption of the Samoa/STMP-LUP revisions until pending public records can be reviewed.

Because the Samoa redlines appear highly tailored to current development sequencing, I have submitted a Public Records Act request seeking communications and records related to the Samoa/STMP-LUP revisions. I ask the County to extend the comment period and not advance the Samoa-specific portions of the HBAP update until residents have had a meaningful opportunity to review those records and understand how the draft was prepared.

This request is not meant to accuse anyone of wrongdoing. It is a request for transparency. When a public planning document makes detailed changes affecting a small community largely owned by one developer, residents deserve to know how those changes were developed and whose interests were represented.

9. Requested revisions before adoption

I respectfully request that the County revise the draft HBAP as follows:

1. Extend the public comment period for the Samoa/STMP-LUP sections.
2. Hold a Samoa-based public workshop focused specifically on the Samoa redlines.
3. Provide a public change matrix explaining each substantive Samoa/STMP-LUP revision.
4. Clarify the maximum potential residential density and unit count in the Samoa RM area, including any density bonus scenario.
5. Add language prohibiting density bonuses, concessions, incentives, or waivers from weakening STMP historic character, visual resource, public access, coastal resource, tsunami safety, infrastructure, and phasing requirements.
6. Add clear design standards for multifamily and affordable housing in Samoa to prevent large, generic, out-of-scale apartment-style development.
7. Require visual simulations, public hearings, and review for substantial new residential development.
8. Clarify whether the revised Master Parcel 2 structure changes the timing or enforceability of existing STMP obligations.
9. Require completion or enforceable bonding of promised public benefits and infrastructure before new residential occupancy.
10. Add a cumulative neighborhood impacts analysis for Samoa residents.
11. Confirm that residents will receive direct mailed notice of future Samoa/STMP-LUP hearings, coastal development permits, subdivision actions, density bonus requests, and design review meetings.

Samoa is not an empty development site. It is a living historic community. Residents support thoughtful restoration, compatible housing, public access, environmental protection, and infrastructure improvements. But the County should not adopt Samoa-specific plan changes that may enable large-scale development without clear disclosure, meaningful resident consultation, enforceable design protections, and strict phasing requirements.

I respectfully ask the County to slow down the Samoa/STMP-LUP portion of the HBAP update, engage directly with Samoa residents, and revise the draft to ensure that future development strengthens Samoa rather than overwhelms it.

Thank you for considering these comments. Please confirm that you have received them and added them to the administrative record.

Sincerely,

Dave Jannetta

Samoa Resident and Homeowner
4 Murphy Ave, Samoa, CA 95564
davejannetta@gmail.com / 484-557-1549 (mobile)

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Dave Jannetta

www.davejannetta.com

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davejannetta@gmail.com

(484) 557-1549

Subject: Public Comment on HBAP Public Draft June 2026 — Samoa Town Master Plan / STMP-LUP Revisions

Dear Humboldt County Planning Staff, Planning Commissioners, and Members of the Board of Supervisors,

I am writing as a resident and homeowner in Samoa to provide public comment on the Public Draft June 2026 Humboldt Bay Area Plan, particularly the sections concerning the Town of Samoa and the Samoa Town Master Plan Land Use Plan overlay.

I appreciate the County's work to update the Humboldt Bay Area Plan and recognize the importance of planning for housing, coastal access, infrastructure, environmental protection, sea level rise, tsunami safety, and economic development. I also support the long-overdue restoration of Samoa's historic homes and infrastructure. Samoa has waited many years for promises in the Samoa Town Master Plan to be fulfilled.

However, I am deeply concerned that the Samoa-specific redline revisions appear to make significant substantive changes to the planning and development framework for Samoa without meaningful consultation with the people who live here. These changes should not be treated as technical cleanup. They directly affect the future form, scale, density, character, safety, and livability of our neighborhood.

My concerns are not opposition to housing or affordable housing. I believe Samoa can and should include housing opportunities for a range of income levels. My concern is that the current draft may allow large-scale, higher-density residential development in or near what residents understood to be the town center or civic heart of Samoa, without clear enough limits on scale, design, phasing, public benefits, parking, traffic, emergency evacuation, or compatibility with the historic company town. A smaller, well-designed, historically compatible affordable housing project may be appropriate. A large apartment-style complex that overwhelms the scale and character of Samoa would not be.

The Samoa sections should be revised, clarified, and re-circulated for meaningful community review before adoption.

1. The County should provide a Samoa-specific redline explanation and change matrix.

The STMP-LUP revisions are complex and difficult for residents to interpret. The draft appears to revise the master parcel structure, change references from Master Parcel 2 to Master Parcels 2 and 3, identify Master Parcel 2 as including the Public Facilities area, Vance Avenue right-of-way, and the Residential Medium Density area, and modify development sequencing and infrastructure requirements.

Before the County advances this draft, it should provide a plain-language change matrix for all Samoa/STMP-LUP revisions showing:

- what each substantive Samoa-specific change does;

- who requested or proposed the change;
- the policy reason for the change;
- whether the change affects development sequencing, density, phasing, public benefits, infrastructure, coastal access, historic preservation, or public review;
- whether the change facilitates a currently proposed development project;
- whether any obligation in the previously certified Samoa Town Master Plan is being weakened, delayed, removed, or made easier to satisfy; and
- whether Coastal Commission staff has reviewed or commented on the change.

Without this information, residents cannot meaningfully evaluate the effect of the draft.

2. The County should hold at least one Samoa-based public workshop before advancing the Samoa/STMP-LUP revisions.

The people most affected by these changes are the residents of Samoa. Many of us purchased homes here with an understanding of the town's historic character, scale, and master plan. We have also lived with delayed timelines and unmet expectations for restoration and infrastructure.

The County should hold at least one in-person public workshop in Samoa, at a time accessible to working residents, focused specifically on the Samoa/STMP-LUP revisions. This workshop should include County Planning staff, the landowner/developer, relevant service providers, and Coastal Commission staff if possible. The purpose should be to explain what is changing, what is not changing, and how residents' concerns will be incorporated before the draft is adopted.

3. The draft should not enable large, out-of-scale residential development in the town center or historic core.

The draft identifies a Residential Medium Density area in Samoa and also includes density bonus language that may allow density ranges to be exceeded for affordable housing. I support affordable housing in principle, but the County should ensure that any affordable or multifamily housing in Samoa is compatible with the historic character, infrastructure capacity, safety constraints, and small-scale coastal village form of the town.

The HBAP should be revised to make clear that any new multifamily or affordable housing in the STMP-LUP area must:

- be compatible with the scale, massing, roof forms, setbacks, streetscape, materials, and architectural rhythm of historic Samoa;
- not take the form of a large, generic apartment complex or monolithic block;
- preserve the function and identity of the town center as a public and civic gathering place;
- include meaningful transitions in scale between new residential development and existing historic homes;

- provide adequate parking and circulation without overwhelming existing streets;
- include visual simulations before approval;
- be reviewed at a noticed public hearing before any discretionary approval; and
- remain appealable where allowed by law.

If the County intends for the Residential Medium Density area to allow large apartment-style development, that should be stated clearly and openly now, not discovered later through project-level permitting.

4. The County should clarify how density bonuses, concessions, waivers, and incentives will apply in the Coastal Zone and within the STMP-LUP.

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I respectfully ask the County to slow down the Samoa/STMP-LUP portion of the HBAP update, engage directly with Samoa residents, and revise the draft to ensure that future development strengthens Samoa rather than overwhelms it.

Thank you for considering these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Dave Jannetta", with a stylized flourish at the end.

Dave Jannetta
Samoa Resident and Homeowner
4 Murphy Ave, Samoa, CA 95564
davejannetta@gmail.com / 484-557-1549 (mobile)



Outlook

HBAP Questions

From Dave Jannetta <davejannetta@gmail.com>

Date Fri 6/26/2026 1:59 PM

To LongRangePlanning@co.humboldt.ca.us <longrangeplanning@co.humboldt.ca.us>

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Hello -

My name is Dave Jannetta and I'm a resident of Samoa, CA. Apologies in advance for the long email. **I sent these same questions to John Ford on June 5th but never received a response.** I've been digging into the HBAP a bit as I'm curious what exactly it means for Samoa. Obviously, it's a big and complicated document and interpreting these types of government documents is not my area of expertise. I had a few observations and questions:

- First - do you have any of the maps that the document is referring to? It would be very helpful in trying to visualize the sections regarding the new Master Parcels. To that end:
- It seems that one of the biggest redline changes is the shift from a simpler master-parcel framework to a revised framework involving Master Parcel 1, Master Parcel 2, and Master Parcel 3.
- The draft says the relevant Samoa lands must be merged and resubdivided by parcel map into two master parcels: Master Parcel 2, consisting of the Public Facilities area for wastewater treatment/disposal, Vance Avenue right-of-way, and the **RM (medium residential) area**; and Master Parcel 3, consisting of all other STMP lands excluding the Samoa Processing Center/Master Parcel 1.
- This seems like a major practical change. My read is that it may make it easier to move certain pieces forward separately, especially the **RM area** + public facilities + Vance Avenue. It looks like it separates that package from the rest of the town. Would that allow the medium-density residential area to advance on its own procedural track?

If you go to the draft document and look at page 180 (this is the page in the PDF itself because there aren't actual easy page numbers to reference in the document) it says:

- Development of the New Residential Areas (**excluding Master Parcel 2**) is subject to the following phasing requirements.....
- These phasing requirements include all sorts of good things but since they exclude Master Parcel 2 then is it true that none of those requirements need to happen and Danco could start on Master Parcel 2 at any point, including the medium density housing?

Finally - can you please let me know when the comment period for this document ends and who/where I should send comments to?

I'm sure I will have more questions about this as the process moves forward. Any plain language context for us laypeople about how this could practically affect our town would be much appreciated.

Thanks so much, reach out if you have any questions, and have a great weekend.

Dave

--

Dave Jannetta

www.davejannetta.com

www.loveandterror.com

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(484) 557-1549



Comments on the Draft HBAP Update

From Jennifer Kalt <jkalt@humboldtwaterkeeper.org>

Date Tue 6/30/2026 4:47 PM

To LongRangePlanning@co.humboldt.ca.us <longrangeplanning@co.humboldt.ca.us>

Cc Matt Simmons <matt@wildcalifornia.org>; Colin Fiske <colin@transportationpriorities.org>; Sylvia van Royen <sylvia@humboldtwaterkeeper.org>; Kraemer, Melissa@Coastal <Melissa.Kraemer@coastal.ca.gov>; Michael van Hattem <michael.vanhattem@wildlife.ca.gov>

 1 attachment (513 KB)

Draft HBAP Comments-EPIC-HWK-CRTP-6-30-26.pdf;

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Good afternoon,

I submit the attached comments on the Draft Humboldt Bay Area Plan Update on behalf of the Environmental Protection Information Center (EPIC), Coalition for Responsible Transportation Priorities (CRTP), and Humboldt Waterkeeper.

We appreciate the opportunity for early review of the first comprehensive update of this important planning framework since it was first adopted in 1983. We recognize that it is a work in progress, and will continue to engage in the public review and comment process in the coming months.

--

Jennifer Kalt, Executive Director

[Humboldt Waterkeeper](https://www.humboldtwaterkeeper.org/) (707) 499-3678



June 30, 2026

Humboldt County Planning Commission and Long Range Planning Staff
3015 H Street
Eureka, CA 95501

Submitted via email: LongRangePlanning@co.humboldt.ca.us

Re: Comments on the Draft Humboldt Bay Area Plan Update

Dear Humboldt County Planning Commission and Staff,

On behalf of the Environmental Protection Information Center (EPIC), Coalition for Responsible Transportation Priorities (CRTTP), and Humboldt Waterkeeper, please accept the following comments on the Draft Humboldt Bay Area Plan Update. We appreciate the opportunity for early review of the first comprehensive update of this important planning framework since it was first adopted in 1983. We recognize that it is a work in progress, and will continue to engage in the public review and comment process in the coming months.

Environmental Justice

We support the new environmental justice policies proposed for the HBAP. We appreciate that the Draft HBAP acknowledges Tribal stewardship, although Tribal consultation and co-management goes beyond acknowledgement. The County must ensure that Tribal engagement on projects in the Coastal Zone is early, meaningful, and robust: not just a box-checking exercise.

We request the addition of another environmental justice policy as follows: “Support the ability of people of all ages, abilities, and incomes, using all modes of transportation—including walking, biking, using mobility devices, and riding transit—to access the coast.”

Onshore Support Facilities for Offshore Oil & Gas

We strongly support the elimination of “marine oil terminals, OCS service or supply bases, ocean intake, outfall or discharge pipelines serving offshore facilities” in Section 3.13.1, Coastal Dependent Industrial Development Policies. These changes are consistent with Senate Bill 704, which was signed into law in

2023.¹ SB 704 removed a 1970s-era loophole known as the “industrial override” provision of the California Coastal Act. This loophole allowed oil and gas companies to develop facilities in the coastal zone, including new or expanded refineries and petrochemical plants, without having to comply with state resource protection policies. SB 704 prohibits “new or expanded oil and gas development from being considered a Coastal-Dependent Industrial facility,” and would only permit those developments if they are determined to be “consistent with all applicable provisions of the act,” according to the text of the bill. Under SB 704, new or expanded oil and gas facilities will have to comply with policies outlined in Chapter 3 of the Coastal Act to be permitted, in line with “virtually all other coastal development.”

Water Quality and Marine Resources

Water quality and marine resources are arguably some of the most important features of the Humboldt Bay area for the environment, human health, the economy, and the culture of our region. Yet the Draft HBAP is lacking in policies that incorporate water protection policies in the Coastal Act.

The health of Humboldt Bay is critical to the region’s economy and cultural identity, as well as to hundreds of resident and migratory species. Water quality is especially important for commercial, recreational, and tribal fishing and shellfish harvesting; the commercial oyster and clam seed industries, which have grown exponentially in the last decade; and boating, paddling, and surfing, which is enjoyed by residents as well as visitors, many of whom flock to world-famous bird-watching areas around the bay.

Policies protecting water quality are critical in areas within the Humboldt Bay Area Plan that are sources of stormwater runoff and other non-point sources of pollution that are not regulated by the County’s Municipal Separate Storm Sewer System (MS4) permit. Examples include the Samoa Peninsula, the Jacobs Avenue area, King Salmon and Fields Landing, and the Bracut area.

Water quality policies appear to be absent in the Draft HBAP, leaving major gaps in water quality protection adjacent to Humboldt Bay and the lower reaches of its tributaries. Development in these areas is most likely to directly impact the health of the bay, and we strongly encourage the County to develop policies to protect water quality in these areas, including post-development runoff requirements, protection of groundwater and natural drainage areas, and minimization of parking lots and other impervious surfaces. Water quality must be protected in areas outside the County’s MS4 permit that involve less than one acre of ground disturbance, since they would not be regulated by Construction General Permits under the North Coast Regional Water Board jurisdiction.

¹ Legiscan. 2023. “Senate Bill 704 (Min).”

https://legiscan.com/CA/text/SB704/id/2829023?_cf_chl_f_tk=lsKTHnuiXcbLdloy8hCdaw6FGli6ft335OokmOITJnM-1782789946-1.0.1.1-ZMksbqCBJ3qbY2yxlUFAiZnL2JZXq9.UwvViXaQhAU

Sea Level Rise Policies

The draft sea level rise policies are a step in the right direction, but in general, the overly cautious approach will leave people, property, and infrastructure at risk. While we support the idea of exploring and evaluating a Transfer of Development Rights Program (Section B.7), we strongly recommend prohibiting further subdivision in areas that are most vulnerable to rising sea level and groundwater.

Shoreline armoring

Shoreline armoring or hardening frequently creates new environmental problems elsewhere, and should be prohibited unless nature-based solutions are not possible. Shoreline armoring can contribute to or exacerbate habitat loss, beach loss, and increased erosion in adjacent areas or even in unexpected areas across the bay. Shoreline armoring alters habitat distribution, ecological connectivity, productivity, and species assemblages across coastal ecosystems.² The same principle applies at a larger landscape scale. When water is prevented from occupying one area, it does not disappear—it is displaced. Floodwaters and tidal energy are redirected toward neighboring shorelines, wetlands, infrastructure, and communities. Armored shorelines can reflect wave energy, increasing nearshore erosion and sediment export in neighboring areas.³

Therefore, a strategy that relies heavily on embankments, levees, or shoreline armoring may protect one location while increasing pressure elsewhere around the bay. Having sea waters that could have inundated agricultural and sparsely populated areas East of the 101 corridor instead inundate Eureka and Arcata is not a sustainable solution. Doing so could substantially increase the need for coastal armoring and protection of these more developed areas of Humboldt Bay at a significant cost. Of course, that armoring would then transfer sea level rise impacts to yet another area of the Bay, creating a race to the bottom that hurts all communities and ecosystems around the bay. As sea levels continue to rise throughout the century, these unintended consequences are likely to become more pronounced and more expensive to address.

Shoreline hardening can also result in groundwater level rise. A recent study found that shoreline barriers can amplify coastal groundwater hazards, exacerbating saltwater intrusion and emergence of groundwater.⁴ Groundwater hazards can require pumping due to reduced soil drainage capacity, which can further increase salinity and degrade groundwater quality. The potential for pumping to lead to further intrusion can be especially problematic near contaminated sites such as the former lumber mill sites.

² Gittman, R.K., et al. (2018). "Generalizing Ecological Effects of Shoreline Armoring Across Soft Sediment Environments." *Estuaries and Coasts* 41(S1): 180–196

³ Prosser, D.J., et al. (2018). "Impacts of Coastal Land Use and Shoreline Armoring on Estuarine Ecosystems: An Introduction to a Special Issue." *Estuaries and Coasts* 41(S1): 2–18.

⁴ Su, X., K.M. Befus, and M.A. Hummel. 2024. "Shoreline Barriers May Amplify Coastal Groundwater Hazards with Sea-Level Rise." *Scientific Reports* 14:15559. <https://www.nature.com/articles/s41598-024-66273-w>

ESHA, Wetlands, and Streamside Management Corridors: Definitions and Protections

We recommend that the County consult with the California Department of Fish and Wildlife and California Coastal Commission to ensure that the following definitions and policies are consistent with the County General Plan as well as state policies that protect these important coastal habitats:

- ESHA Identification and Mitigation;
- Non-ESHA: We oppose the inclusion of “Dunes covered with predominantly non-native vegetation (greater than 50 percent absolute cover of non-natives and less than 5 percent absolute cover of native dune species)” as Non-ESHA, since it has been clearly demonstrated that these areas can be restored to native dune vegetation by removing European beachgrass and other non-native vegetation;
- Wetlands and Wetland buffers;
- Road Construction Within Watersheds Containing Wetlands;
- Coastal Streams, Riparian Vegetation, and Marine Resources: This section does not include any changes from the existing HBAP language, although it appears to be inconsistent with the County General Plan that was adopted in 2017.

Outdoor Lighting

It is integral to the health and wellbeing of wildlife and humans to limit pollution from outdoor lighting, especially in the Coastal Zone. Light pollution disrupts the circadian rhythms of people as well as urban-dwelling and migrating birds, bats, and even aquatic animals, particularly in sensitive coastal habitats.⁵ Studies have found that light pollution can alter mating behavior⁶ and reproductive cycle timing⁷ in migratory and urban birds.

While the latest draft of the HBAP includes several mentions of outdoor lighting, most often in the Samoa Town Master Plan, there is a lack of broadly applicable policies to limit light pollution.

We offer the following recommendations to strengthen the HBAP’s protection of the birds, animals, plants, and humans in the Coastal Zone that are impacted by light pollution:

- Require dark sky friendly lighting in the coastal zone, regardless of land use.
- Include dark sky friendly lighting requirements in the Port Overlay Zone.
- Integrate language from the Coastal Outdoor Lighting Ordinance - all outdoor lighting must:

⁵ Rodrigo-Camino, J; Seeling, S; Seeger, M.; Ries, J. 2023. **Light Pollution: A Review of the Scientific Literature**. The Anthropocene Review. Vol. 10(2) 367-392. <https://doi.org/10.1177/20530196211051209>

⁶ Hunt, S., Cuthill, I.C., Bennett, A.T.D., Church, S.C. & Partridge, J.C. 2001. **Is the ultraviolet waveband a special communication channel in avian mate choice?** Journal of Experimental Biology, 204, 2499–2507.

⁷ Dominoni, D. M., & Partecke, J. 2015. **Does light pollution alter daylength? A test using light loggers on free-ranging European blackbirds (*Turdus merula*)**. Philosophical Transactions of the Royal Society B: Biological Sciences, 370(1667), 20140118. <https://doi.org/10.1098/rstb.2014.0118>

- only be lit when the lit space is actively in use or for safety needs
- Limit the lit area to the portion of the property engaged in activity
- Be shielded and directed downward, and not towards ESHA or upwards
- Have a color temperature of 2700 K or less
- residential lighting not to exceed 1,100 lumens, and commercial lighting not to exceed 3,200 lumens

Port Overlay Zone

Policy 3.13.12 – Port Overlay Zone: Additional Environmental Protection Standards Needed

Errata

Policy 3.13.12 says, “When heavy lift marine terminals are needed to provide support for offshore wind development, a Port Overlay Zone will be established to consider the unusual development needs ~~to~~ of a heavy lift terminal.”

Environmental Protections

We recognize that the goal of this policy is to facilitate plans to redevelop Redwood Marine Terminal I in Samoa to support offshore wind development. However, because the proposed Port Overlay Zone will be the subject of a separate, future public process is intended to facilitate substantial new industrial development, it must include clear policies requiring avoidance, minimization, and mitigation of impacts to Humboldt Bay’s unique natural resources, Tribal cultural resources, and neighboring communities. The Local Coastal Program should not simply facilitate development by eliminating existing standards; it must ensure that such development remains fully consistent with the California Coastal Act’s requirements to protect environmentally sensitive habitat areas (ESHA), wetlands, water quality, marine resources, public health, and environmental justice.

Because the proposed Port Overlay Zone is intended to streamline future coastal-dependent industrial development for renewable, marine-dependent energy projects, these policies should be incorporated at a high level into the Humboldt Bay Area Plan now rather than deferred to subsequent project-level review. Establishing clear environmental performance standards at the planning level will provide greater regulatory certainty for applicants while ensuring that future offshore wind infrastructure proceeds in a manner consistent with the California Coastal Act, environmental justice principles, and the long-term ecological health of Humboldt Bay.

At a minimum, the future Port Overlay Zone must include policies requiring future development proposals to address the following issues:

Noise and Vibration

- Construction and operational noise impacts on nearby residential communities, Tribal cultural activities, recreation areas, and sensitive wildlife.
- Pile driving, heavy equipment operations, vessel traffic, and fabrication activities.
- Operational vibration impacts from heavy industrial equipment, cranes, and transportation infrastructure on adjacent properties, wildlife, and cultural resources.
- Operational vibration impacts from vessel traffic associated with port operations

Lighting

- Comprehensive dark-sky and wildlife-friendly lighting standards.
- Minimization of nighttime lighting to reduce impacts on migratory birds, shorebirds, fish, bats, marine mammals, and surrounding communities.
- Shielding, adaptive controls, and motion-activated lighting wherever feasible.

Traffic and Transportation

- Increased truck traffic, employee commuting, oversized load transport, and construction traffic.
- Traffic safety for adjacent neighborhoods, bicyclists, pedestrians, commercial fishermen, and recreational users.
- Air quality impacts associated with increased vehicle activity.

Air Quality and Port Electrification

- Policies requiring zero-emission port operations and infrastructure.
- Shore power requirements for vessels.
- Electrification of cargo handling equipment, cranes, vehicles, and other port equipment.
- Infrastructure planning sufficient to avoid long-term reliance on diesel-powered equipment and generators.
- Fenceline monitoring of criteria pollutants, hazardous air pollutants, and greenhouse gas emissions.

Water Quality

- Stormwater treatment using best available practices.
- Prevention of sediment discharge during construction.
- Spill prevention and response planning for fuels, lubricants, hydraulic fluids, and hazardous materials associated with increased vessel traffic and wind turbine manufacturing.
- Monitoring of turbidity and contaminant releases associated with dredging, shoreline work, and marine construction.
- Protection of groundwater and adjacent aquatic habitats.

Wetlands and Environmentally Sensitive Habitat Areas (ESHA)

- Avoidance of impacts to coastal wetlands and ESHA to the maximum extent feasible.

- Recognition that Humboldt Bay's wetlands, mudflats, eelgrass beds, and tidal marshes are protected coastal resources that provide essential ecological functions.
- Buffer requirements between industrial development and adjacent wetlands.
- Long-term monitoring and adaptive management for mitigation sites.

Fish and Wildlife

- Protection of migratory birds using the Pacific Flyway, including disturbance from construction, lighting, and vessel activity.
- Impacts to eelgrass, forage fish, salmonids, Dungeness crab, marine mammals, shorebirds, waterfowl, and other sensitive species.
- Seasonal work windows where appropriate.
- Monitoring of underwater noise and other marine disturbances.

Marine Invasive Species

- Vessel and wind turbine component biofouling management.
- Ballast water management consistent with state and federal requirements.
- Monitoring and rapid response protocols for invasive aquatic species introduced through increased vessel traffic.

Tribal Resources and Cultural Protection

- Early, ongoing, and meaningful government-to-government consultation with affected Tribes. Since a proposed Port Overlay Zone would trigger tribal consultation as well as CEQA, this should begin as soon as possible.
- Tribal cultural resource surveys prior to ground disturbance.
- Tribal monitors during grading, excavation, dredging, shoreline modification, and other ground-disturbing activities
- Procedures for inadvertent discoveries of cultural materials or ancestral remains.
- Consideration of tribal ceremonies and the potential for work windows around ceremonies

Missing and Murdered Indigenous People (MMIP)

- Recognition that large temporary construction workforces can increase risks faced by Indigenous people.
- Development of MMIP prevention measures in consultation with affected Tribes.
- Worker training, contractor codes of conduct, community reporting protocols, and coordination with Tribal governments and local service providers.
- See the Yurok Tribal Court MMIP Prevention Planning and Recommendations June 21, 2023 available [here](#).

Environmental Justice

- Evaluation of cumulative impacts to nearby disadvantaged communities and Tribal communities.
- Ongoing public engagement with affected neighborhoods, in particular the Phyllis Rex Samoa Townhomes.
- Monitoring of cumulative noise, air quality, traffic, and industrial impacts over time.

Climate Resilience

- Sea level rise adaptation that avoids transferring flood risks to adjacent wetlands or neighboring communities.
- Nature-based shoreline approaches where feasible.
- Protection of future wetland migration corridors.

Sediment contamination and legacy pollution

- Characterization of contaminated soils and sediments.
- Management and disposal of contaminated dredged material.
- Long-term groundwater monitoring.

Hydrology and tidal processes

- Alteration of tidal prism and circulation.
- Flood storage capacity.
- Increased erosion elsewhere in the bay.
- Impacts to adjacent restoration projects.

Recreation, Fishing, & Mariculture

- Navigation conflicts.
- Impacts to recreation in the Bay
- Effects on commercial fishing infrastructure.
- Shellfish harvesting.
- Mariculture operations.
- Subsistence and Tribal harvest of fish and shellfish.

Emergency Preparedness

- Fire suppression.
- Hazardous material storage.
- Battery fires.
- Spill response.
- Tsunami emergency planning.

- Evacuation routes.

Contaminated Sites Overlay Zone

There are numerous extant and former industrial sites within the HBAP planning area harbor legacy contamination in soil and/or groundwater, including dozens of former lumber mills. Many were built on former wetlands and are contaminated with dioxins and furans from pentachlorophenol, a wood preservative that was used for decades.

Humboldt Bay was designated as Impaired by dioxins in 2006. Dioxins are dangerous, extremely persistent reproductive toxins that biomagnify up the food chain. Any ground disturbance on any former or currently operating industrial site has the potential to mobilize dioxins and other contaminants, putting human health and the environment at risk, including protected species such as salmonids and fish-eating species such as raptors, marine mammals, and humans. Dioxin contamination is poorly documented in many cases due to the fact that responsible agencies generally failed to address it in site assessments until fairly recently.

Many of these sites are vulnerable to rising sea level and groundwater that will eventually remobilize contaminants into Humboldt Bay, its tributaries, and/or adjacent lands. Remediating these sites prior to ground disturbing activities is critical to protect human health and the environment. Even sites that have been partially remediated can harbor contaminated groundwater beneath building foundations that be disturbed and remobilized off-site as a result of ground disturbance.

Except in the section on the Samoa Town Master Plan, the Draft HBAP fails to describe contaminated industrial sites, the legacy of dioxins in Humboldt Bay, and the designation of the bay as Impaired by dioxins and furans under Section 303(d) of the Clean Water Act. In the absence of evidence to the contrary, these sites must be regarded as having a high likelihood of contamination, just as one would assume that buildings built in certain eras are likely to contain lead and asbestos until adequate sampling is conducted.

We recommend the development of a Contaminated Sites Overlay Zone to flag these sites as requiring more information before ground disturbing activities can proceed.

Urban Limit Lines

Where the lines are drawn around areas considered urban or appropriate for urban development is one of the most important policy decisions in a planning document. To comply with the Regional Climate Action Plan and other existing goals and policies, future urban development must reduce vehicle miles traveled (VMT) and ensure low-carbon, multimodal transportation options. Therefore, the criteria used to identify the Urban Limit Line (Section 3.4.B.1.a) should be amended to add two additional criteria:

- The resulting development patterns support the goals, policies, measures, and targets of the Regional Climate Action Plan and the Regional Transportation Plan.

- Reasonable pedestrian, bicycle, and/or transit access exists or can be feasibly provided to jobs, services, and other important destinations.
- Equally important, these same two criteria should also be added as required findings to allow development within the Urban Limit Line (Section 3.4.B.2.c) and to extend the Urban Limit Line (Section 13.B.2).

Urban Land Uses

The HBAP update should retain and expand, rather than eliminate, the Residential/High Density (RH) land use (see Section 4.2). This is an appropriate land use intensity for certain areas covered by the plan, notably Myrtle town, and will help the County meet its housing and climate goals.

Regarding Myrtle town specifically, the HBAP currently calls for future development in the area to “follow the existing zoning” (Section 3.4.A.2). However, Myrtle town is the most suitable location in the plan area for higher density infill development, and possibly the most suitable location in the entire unincorporated county. We urge the county to upzone the Myrtle town area to allow higher densities and a greater mix of uses.

Additionally, in order to facilitate new housing as well as a VMT-reducing mix of land uses, we encourage the county to allow residential development as a principally permitted use in commercial zones within Urban Limit Lines (see Section 4.2).

Active Transportation

In order to encourage the use of active transportation for health, climate, and economic development reasons, and to provide access to the coast for people using all modes of transportation, we suggest the following HBAP edits:

- **Section 3.8.B.6** should be amended to include bicycle connections, as well as pedestrian connections, as an eligible measure for a density bonus request.
- **Section 3.13.B.3.g** should be amended to allow not just the construction of bikeways, but rather the construction or improvement of any bicycle, pedestrian, and transit infrastructure on public roadways.
- **Section 3.19.B** should be amended to add bicycles and transit as modes of transportation wherever other modes—such as pedestrians, equestrians, and vehicles—are referenced.
- **Section 3.19.B.1.a.1** should include bicycle as well as vehicle parking as an important coastal access improvement. Additional language should also be added to acknowledge that the over-provision of vehicle parking can make access by other modes more difficult, both by increasing the distance pedestrians and bicyclists have to travel and by creating hostile or unsafe environments for pedestrians and bicyclists.
- **Section 3.19.B.1.a.2.d** should be amended to remove parking and road capacity. These are matters of convenience, not health and safety.

We appreciate the opportunity to review and comment on the Draft Humboldt Bay Area Plan Update, and we look forward to continued involvement in the HBAP as it evolves.

Sincerely,

Matt Simmons, Climate Attorney
Environmental Protection Information Center (EPIC)

Jennifer Kalt, Executive Director
Humboldt Waterkeeper

Colin Fiske, Executive Director
Coalition for Responsible Transportation Priorities (CRTP)

Cc:

Melissa Kraemer, California Coastal Commission
Melissa.Kraemer@coastal.ca.gov

Michael van Hattem, California Dept. of Fish & Wildlife michael.vanhattem@wildlife.ca.gov



Concerned home owner The Town of Samoa

From eron gonzales <605sarah@gmail.com>

Date Tue 6/30/2026 2:19 PM

To LongRangePlanning@co.humboldt.ca.us <longrangeplanning@co.humboldt.ca.us>

Cc Eron Davis-Gonzales <605sarah@gmail.com>

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Subject: Public Comment on HBAP Public Draft June 2026 — Samoa Town Master Plan / STMP-LUP Revisions

Dear Humboldt County Planning Staff, Planning Commissioners, and Members of the Board of Supervisors,

I'm writing as a resident and homeowner in Samoa to share my thoughts on the Public Draft June 2026 Humboldt Bay Area Plan, especially the parts about the Town of Samoa and the Samoa Town Master Plan Land Use Plan overlay.

I really appreciate the County's efforts to update the Humboldt Bay Area Plan and understand how important it is to plan for housing, coastal access, infrastructure, environmental protection, sea level rise, tsunami safety, and economic growth. I also support the long-awaited restoration of Samoa's historic homes and infrastructure. Samoa has been waiting for the Samoa Town Master Plan promises to come true for so long.

However, I'm a bit worried that the Samoa-specific redline revisions seem to make some big changes to how Samoa is planned and developed, without really talking to the people who live here. These changes shouldn't just be seen as fixing technical issues. They really impact what our neighborhood will look like in the future, including how big, dense, and safe it will be.

My main concern isn't against housing or affordable housing. I think Samoa can and should have housing options for everyone. What worries me is that the current draft might let big, high-density residential projects happen in or near what residents thought of as the town center or the heart of Samoa, without clear limits on how big, how they're designed, when they're built, what public benefits they bring, parking, traffic, how easy it is to get out in emergencies, or how well they fit with the historic company town. A smaller, well-thought-out, historically compatible affordable housing project might be better. A huge apartment complex that takes over the scale and character of Samoa wouldn't be.

The Samoa sections should be revised, made clearer, and shared again so everyone can understand them better.

Let's get a community review before we move forward with adoption.

1. The County should put together a Samoa-specific explanation and change matrix.

The STMP-LUP revisions are a bit tricky, and it's hard for residents to understand them. The draft seems to tweak the master parcel structure, switch references from Master Parcel 2 to Master Parcels 2 and 3, mark Master Parcel 2 as including the Public Facilities area, Vance Avenue right-of-way, and the Residential Medium Density area, and change how development is planned and what infrastructure is needed.

Before the County goes ahead with this draft, it should give us a clear, easy-to-understand change matrix for all the Samoa/STMP-LUP changes. This matrix should show:

- What each Samoa-specific change actually does;
- Who asked for or suggested the change;
- Why the change is needed;
- Whether the change affects how development is planned, how dense it is, when it starts, what public benefits it brings, what infrastructure is needed, how easy it is to get coastal access, whether it affects historic preservation, or whether it affects public review;
- Whether the change helps a project that's already being planned;
- Whether any rules in the Samoa Town Master Plan are being made easier to follow, delayed, removed, or changed; and
- Whether Coastal Commission staff has looked at or commented on the change.

Without this info, it's tough for residents to really understand what the draft means for them.

2. The County should organize at least one public workshop in Samoa before moving forward with the Samoa/STMP-LUP revisions.

The people who will be most impacted by these changes are the residents of Samoa. Many of us bought homes here knowing about the town's history, size, and master plan. We've also experienced delays and unmet expectations for restoring and building infrastructure.

The County should hold at least one public workshop in Samoa, at a time that works for working residents, and focus specifically on the Samoa/STMP-LUP revisions. This workshop should include County Planning staff, the landowner/developer, and other relevant people.

Let's get in touch with service providers and Coastal Commission staff, if possible. We want to explain what's changing, what's staying the same, and how we'll address residents' concerns before we finalize the draft.

3. The draft should definitely not allow for large, out-of-scale residential development in the town center or historic core.

The draft mentions a Residential Medium Density area in Samoa and also includes density bonus language that might allow for higher density ranges for affordable housing. I'm all for affordable housing, but the County needs to make sure that any affordable or multifamily housing in Samoa fits with the town's historic character, infrastructure, safety, and small-scale coastal village feel.

The HBAP should be updated to make it clear that any new multifamily or affordable housing in the STMP-LUP area must:

- match the scale, massing, roof styles, setbacks, street design, materials, and architectural flow of historic Samoa;
- not look like a big, generic apartment complex or a single block;
- keep the town center's public and civic vibe as a place for people to gather;
- have smooth transitions in size between new homes and existing historic houses;
- provide enough parking and flow without cluttering the streets;
- include visual simulations before giving the green light;
- be reviewed at a public hearing before any final approval; and
- stay up for appeal if allowed by law.

If the County wants the Residential Medium Density area to allow for big apartment-style development, let's be clear and upfront about that now, not when we're approving projects.

4. The County should also clarify how density bonuses, concessions, waivers, and incentives will work in the Coastal Zone and within the STMP-LUP.

The draft mentions density bonuses for affordable housing and suggests that density ranges might be higher.

It's great that the statement mentions exceeding legal limits while staying true to certified LCP policies and development standards. However, there's still more to be done.

The County should clarify:

- Whether density bonuses can be used in the Samoa STMP-LUP area.
- The highest possible number of units that could be built in the Samoa RM area if density bonus rules are followed.
- Whether concessions, incentives, or waivers could be used to lower design standards, height limits, parking standards, setbacks, open space, visual protections, or historic character requirements.
- Whether any such concessions or waivers could take precedence over the Design Guidelines for Old Samoa or the STMP Community Character/Visual

policies.

- How the County will decide if increasing the density would harm coastal resources, public views, public safety, evacuation, or community character.
- How residents will be informed and allowed to participate before any density bonus approval.

The County should also include language stating that density bonuses and affordable housing incentives should not be used to weaken STMP-LUP policies that protect historic community character, public coastal views, tsunami safety, public access, ESHA/wetland protections, or required phasing and infrastructure obligations.

5. The STMP phasing requirements must remain enforceable and should not be ignored.

The Samoa Town Master Plan has always included public benefits and sequencing requirements, such as restoring existing structures, improving wastewater and water infrastructure, enhancing emergency services, creating pedestrian and bicycle paths, providing beach and dune access, offering low-cost accommodations for visitors, public amenities, and other improvements. The County should make sure that new residential development cannot happen before the necessary infrastructure, public access improvements, restoration of the old town, emergency services, wastewater capacity, tsunami safety planning, and long-term maintenance are in place.

If the updated Master Parcel 2 plan is meant to help with wastewater improvements, Vance Avenue upgrades, and residential development for RM homes, it should be clear and well-explained why these can happen separately or sooner than other STMP tasks. The County shouldn't let the most profitable or important private projects move ahead while delaying public benefits, historic restoration, and community improvements.

6. Let's make sure historic character protections are stronger, not just kept the same.

The draft includes important language that says development needs to keep Samoa's historic community character safe and sound, and it uses the Design Guidelines for Old Samoa. I really support keeping and making these rules even better.

The final HBAP should make it clear that:

- new buildings in Samoa should look good with the historic company town;
- this means they need to match in size, shape, height, materials, roofs, porches, windows, distances from buildings, landscaping, lighting, signs, and how the streets look;
- we need to look at how new buildings will look for all big developments in the STMP-LUP area;

- design reviews should be for big new homes, not just fixing old buildings;
 - public spots like the Women's Club and town center need to be protected from new buildings that don't fit in; and
 - the outside lighting, signs, and how buildings are built shouldn't change Samoa's historic look or the views of the coast.
- The County shouldn't say it's protecting historic Samoa while letting new buildings change its character a lot.

7. Before making Samoa-specific changes, let's think about how they'll affect neighborhoods.

The draft has real effects on what people do every day. Before we go ahead, the County should look at and tell us what might happen to:

- traffic on Vance Avenue, New Navy Base Road, and the streets inside Samoa;
- where we can park.
- emergency evacuation capacity, including tsunami evacuation;
- fire and emergency response;
- water and wastewater capacity;
- stormwater drainage and flooding;
- lighting and night-sky impacts;
- construction impacts;
- public access and visitor traffic;
- coastal views and views from existing homes and public gathering places;
- compatibility with existing historic homes;
- effects on the town center; and
- cumulative impacts from residential development, business park development, public facilities, coastal access improvements, and nearby industrial or port-related projects.

Samoa's location makes it a bit tricky. People are worried about being surrounded by lots of big projects at once: new homes, business parks, wastewater facilities, better public access, offshore wind/port stuff, and other infrastructure. These combined effects should be considered before the plan is finalized.

8. The County should hold off on adopting the Samoa/STMP-LUP revisions until the public records can be reviewed.

The Samoa redlines seem to be very specific to what's happening right now. I've asked for records and communications related to the Samoa/STMP-LUP revisions through the Public Records Act. I'm asking the County to give the comment period a bit more time and not move forward with the Samoa-specific parts of the HBAP update until residents have had a chance to look at these records and understand how the draft was put together.

This request isn't about accusing anyone of anything. It's just a request for openness.

When a public planning document makes detailed changes that affect a small community, mostly owned by one developer, residents should know how those changes were made and who was involved.

9. Revisions before adoption

I'd like the County to make the following changes to the draft HBAP:

1. Extend the public comment period for the Samoa/STMP-LUP sections.
2. Organize a public workshop in Samoa that focuses specifically on the Samoa redlines.
3. Could you please provide a public change matrix that explains each important change to the Samoa/STMP-LUP?
4. Let's make sure we're clear about the maximum residential density and unit count in the Samoa RM area, including any potential density bonus.
5. We should add language that prevents density bonuses, concessions, incentives, or waivers from harming the STMP's historic character, visual resources, public access, coastal resources, tsunami safety, infrastructure, and phasing requirements.
6. We need to add clear design standards for multifamily and affordable housing in Samoa to avoid large, generic, out-of-scale apartment-style developments.
7. For any significant new residential development, we should require visual simulations, public hearings, and a review.
8. Let's clarify whether the updated Master Parcel 2 structure changes when or if existing STMP obligations are enforced.
9. We need to ensure that promised public benefits and infrastructure are completed or have enforceable bonds before new residential occupancy.
10. We should add a neighborhood impacts analysis for Samoa residents.
11. Finally, let's confirm that residents will receive direct mail notifications about future Samoa/STMP-LUP hearings, coastal development permits, subdivision actions, density bonus requests, and design review meetings.

Samoa is more than just an empty development site; it's a vibrant historic community. Residents are behind thoughtful restoration, compatible housing, public access, environmental protection, and infrastructure improvements. However, the County should be careful not to adopt Samoa-specific plan changes that might allow large-scale development without clear disclosure, meaningful resident consultation, enforceable design protections, and strict phasing requirements.

I kindly ask the County to take a step back with the Samoa/STMP-LUP part of the HBAP update, engage directly with Samoa residents, and revise the draft to ensure that future development strengthens Samoa rather than overwhelms it. Thank you for considering these comments.

Sincerely,

Eron Gonzales

Samoa Resident
15 Bayview Avenue
Samoa, Ca 95564

605sarah@gmail.com/530-903-6086

Sent from my iPhone



Outlook

Town of Samoa

From eron gonzales <605sarah@gmail.com>**Date** Sat 6/27/2026 10:46 AM**To** LongRangePlanning@co.humboldt.ca.us <longrangeplanning@co.humboldt.ca.us>

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Hello,

I am a resident of the old town of Samoa. When we purchased our home, we were sold on the Master Plan for Samoa, which promised that all homes would be renovated, roads and utilities would be upgraded (electricity would be underground), sidewalks and the location of the firehouse would be transformed into a market and coffee shop. However, the changes to the plan are not what we were sold on, and we as residents were not even consulted or asked for our opinions on the changes. We purchased a quiet place to live. A new apartment complex would bring over 250 people to our neighborhood, which would entail numerous changes and is not what we were sold on.

Please consider our concerns as a resident.

Thank you,

Eron Gonzales

Sent from my iPhone



Outlook

Humboldt Bay Area Plan Comment Letter

From Jeannie Fulton <jfulton@humboldtcountyfarmbureau.com>

Date Tue 6/30/2026 4:56 PM

To LongRangePlanning@co.humboldt.ca.us <longrangeplanning@co.humboldt.ca.us>

 1 attachment (261 KB)

Final.HBAP.CommentLetter.2026.pdf;

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Please find the Humboldt County Farm Bureau's comments attached.

--

Jeannie Fulton

Executive Director

Humboldt County Farm Bureau

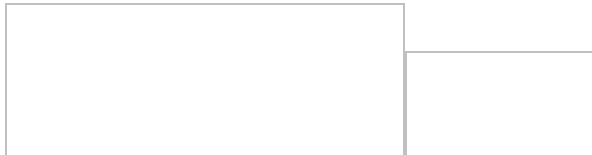
Redwood Region Logging Conference

5601 S Broadway

Eureka, CA 95503

B 707-443-4844

C 707-496-9244





June 30, 2026

Humboldt County Planning Commission
Humboldt County Planning & Building Department
3015 H Street
Eureka, CA 95501

RE: Humboldt Bay Area Plan (HBAP) Public Draft 2026

Dear Commissioners and Planning Staff:

On behalf of the Humboldt County Farm Bureau (HCFB), we appreciate the opportunity to comment on the Public Draft 2026 Humboldt Bay Area Plan (HBAP).

Since 1913, the Humboldt County Farm Bureau has worked to promote and protect production agriculture and the rural way of life. We are a non-governmental, voluntary membership nonprofit organization. We recognize the importance of protecting Humboldt Bay's natural resources and planning for future challenges. We also believe the long-term health of Humboldt Bay depends upon maintaining the viability of the industries and landowners that have stewarded this landscape for generations.

The 2026 HBAP update identifies sea-level rise adaptation, environmental justice, habitat protection, public access, industrial development needs, and accommodations for offshore wind development as the primary drivers of the Plan update. (Chapter 1, Section 1.10.) While these issues receive significant attention throughout the draft Plan, we are concerned that comparatively little attention has been given to evaluating the cumulative impact of these policies on agriculture, aquaculture, working waterfronts, and private property owners.

Agriculture and Aquaculture Are Essential Coastal Resources

Agriculture is not simply a land use within the Humboldt Bay Planning Area. Agriculture, ranching, timber production, and shellfish aquaculture are resource-dependent industries that contribute to Humboldt County's economy, food security, open space preservation, environmental stewardship, and cultural heritage.

Commercial shellfish aquaculture is one of Humboldt Bay's most important agricultural industries. Humboldt Bay produces approximately 55 percent of California's oysters and supplies a significant portion of the shellfish seed stock used throughout the West Coast. The industry's success depends entirely upon clean water, compatible shoreline land uses, and access to appropriate waterfront infrastructure.

As the County updates the Humboldt Bay Area Plan, we believe aquaculture should be recognized as a critical agricultural use deserving of active support and protection.

Equal Consideration for Existing Food-Producing Industries



HCFB is concerned that the draft Plan appears to be willing to create planning accommodations and regulatory flexibility for emerging industrial uses associated with offshore wind development, while providing little comparable consideration for existing food-producing industries.

Agriculture, aquaculture, commercial fishing, timber production, and other working waterfront industries have operated responsibly in Humboldt Bay for decades and should receive equal consideration in evaluating future land-use policies, permitting requirements, infrastructure planning, and resource protection measures.

The County should ensure that existing industries are not subjected to greater regulatory burdens than newly proposed industrial development.

Offshore Wind Development and Potential Impacts to Aquaculture

HCFB recognizes that many decisions regarding offshore wind generation and federal lease areas occur outside the County's authority. However, HBAP includes planning policies intended to facilitate industrial development associated with offshore wind infrastructure, including the proposed Heavy Lift Marine Terminal and related port improvements.

As these policies move forward, the County should fully evaluate and disclose the potential impacts of associated construction and operational activities on Humboldt Bay's shellfish aquaculture industry and marine food-production economy.

Potential concerns include:

- Expanded dredging activities and sediment disturbance;
- Changes in water circulation and sediment transport patterns;
- Increased commercial vessel traffic within Humboldt Bay;
- Introduction of invasive species, marine pests, pathogens, and biosecurity threats through vessel movements and equipment transfers;
- Risks to shellfish hatcheries, nurseries, and production areas;
- Water quality impacts associated with industrial activities and vessel maintenance;
- Potential contamination from antifouling paints, coatings, and other industrial materials;
- Conflicts with existing working waterfront uses, including aquaculture and commercial fishing.

The draft Plan contains extensive discussion regarding protection of environmentally sensitive habitat areas, wetlands, marine resources, and water quality. The County should apply the same level of scrutiny to potential impacts associated with offshore wind infrastructure and related industrial development.

The County should ensure that policies supporting new industrial uses do not inadvertently undermine existing food-producing industries that depend upon Humboldt Bay's environmental health.



Protecting Coastal-Dependent Food Production

HCFB encourages the County to identify and preserve shoreline areas that are uniquely suited for coastal-dependent food production, including shellfish aquaculture.

Current shoreline zoning may allow future industrial uses that create potential water-quality concerns, even where such activities are unlikely to occur. These potential future uses can limit opportunities for aquaculture expansion and unnecessarily constrain food production within Humboldt Bay.

The County should evaluate planning tools and land-use strategies that protect water quality, maintain compatible shoreline uses, and support the continued growth of coastal-dependent food-production industries.

As the County considers accommodation for new industrial development, it should also adopt measures that protect and support existing food-producing industries that depend on clean water and healthy marine ecosystems.

Consultation with the Shellfish Aquaculture Industry

Given the importance of shellfish aquaculture to Humboldt Bay's economy, food production, and environmental stewardship, HCFB respectfully requests that the County establish a formal process for consultation with shellfish growers and aquaculture stakeholders prior to adopting policies affecting waterfront industrial lands, coastal-dependent development areas, dredging activities, navigation improvements, or other projects that may affect water quality, biosecurity, or shellfish production.

Shellfish producers possess decades of practical experience regarding water quality, marine ecosystem health, invasive species risks, vessel traffic impacts, and the operational requirements of a successful working waterfront. Their expertise should be incorporated early in the planning process rather than after major policy decisions have been made.

Meaningful consultation will help ensure that future land use decisions balance environmental protection, economic development, and the continued viability of one of Humboldt Bay's most important food-producing industries.

Regulatory Parity for Aquaculture Infrastructure

The draft HBAP includes provisions intended to facilitate development associated with the Port Overlay Zone and Heavy Lift Marine Terminal.

HCFB respectfully requests that the County provide similar consideration for infrastructure necessary to support shellfish aquaculture and other coastal-dependent food production activities.

Facilities such as hatcheries, pump stations, water intake systems, tanks, processing facilities, and related infrastructure are essential to food production and should receive the same level of policy consideration as industrial development, provided that environmental impacts are appropriately minimized and addressed.

Streamlined Permitting for Food Production

HCFB supports efficient permitting processes that maintain environmental protection while reducing unnecessary regulatory burdens.



The County should explore opportunities to support consolidated permitting, programmatic environmental review, and other tools that improve permitting efficiency for coastal-dependent food production industries.

Reducing permitting complexity can encourage investment, job creation, and sustainable expansion of local food production while maintaining environmental safeguards.

Sea Level Rise and Agricultural Infrastructure

The HBAP acknowledges that transitional agricultural lands surrounding Humboldt Bay face increasing risks from flooding and saltwater intrusion.

Many agricultural operations rely upon levees, dikes, tide gates, drainage systems, and water-control infrastructure to remain productive.

The Farm Bureau is concerned that the future implementation of sea-level-rise adaptation policies could increase permitting burdens or create uncertainty regarding the maintenance, repair, and improvement of this infrastructure.

The County should explicitly recognize the importance of maintaining agricultural flood-control and drainage systems as part of any future adaptation strategy.

Protection of Private Property Rights

The draft Plan contains policies regarding resource buffers, habitat protection areas, public lands, and public access improvements. The Plan appropriately recognizes that affected property owners should participate in discussions concerning the location and implementation of resource buffers.

The Farm Bureau strongly supports this principle and encourages the County to continue emphasizing voluntary participation, meaningful consultation, and protection of existing agricultural operations when implementing future conservation policies.

Agricultural Impact Analysis

Perhaps most importantly, the Humboldt County Farm Bureau respectfully requests that the County conduct and publish an Agricultural Impact Analysis before adoption of the updated Humboldt Bay Area Plan.

While the draft contains extensive discussion of environmental impacts and resource protection, it does not appear to include a corresponding evaluation of:

- Potential impacts to agricultural acreage;
- Economic impacts to farming, ranching, aquaculture, timber production, and commercial fishing;
- Costs associated with new permitting and mitigation requirements;
- Impacts to levees, tide gates, drainage systems, and agricultural infrastructure;
- Potential effects on agricultural land values;



- Potential impacts to shellfish production and working waterfront operations; and
- Cumulative regulatory impacts on working lands and working waters.

Agriculture deserves the same level of analysis and consideration afforded to other resources addressed throughout the Plan.

The Humboldt County Farm Bureau supports responsible stewardship of Humboldt Bay and recognizes the importance of balancing environmental protection with economic sustainability.

We respectfully request that the County strengthen recognition of agriculture and aquaculture as valuable coastal resources, evaluate the cumulative impacts of proposed policies on working lands and working waters, provide equitable treatment for existing food-producing industries, and ensure that policies intended to accommodate future industrial development do not compromise the viability of Humboldt Bay's agricultural economy.

We further request that the County establish ongoing consultation with Humboldt Bay's shellfish aquaculture industry as future waterfront, port, offshore wind, dredging, and industrial development policies are evaluated. Decisions affecting Humboldt Bay's future should be informed by the expertise of those whose livelihoods depend upon maintaining the Bay's water quality and ecological health.

The future of Humboldt Bay should not be measured solely by the industries we hope to attract, but also by our commitment to protecting the industries that already exist and have sustained this region for generations.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeff Mason'.

Jeff Mason

President

Humboldt County Farm Bureau



Public Comment on Humboldt Bay Area Plan (HBAP) Draft – Jesse Lopez

From Jesse Lopez <jessebropez@gmail.com>

Date Mon 6/29/2026 9:52 PM

To LongRangePlanning@co.humboldt.ca.us <longrangeplanning@co.humboldt.ca.us>

Cc Samoa Community Connect <samoacommunityconnect@gmail.com>; Arroyo, Natalie <narroyo@co.humboldt.ca.us>

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Dear Humboldt County Planning Commission and Board of Supervisors,

I am writing to submit formal public comments regarding the June 2026 Public Draft of the Humboldt Bay Area Plan (HBAP), specifically concerning updates to the Samoa Town Master Plan (STMP) Land Use Designation Overlay and the master parcel merger requirements.

As a stakeholder, I am concerned by the lack of localized community engagement and the potential consequences of these proposed policy shifts on the existing town of Samoa and its residents. The County should conduct dedicated, localized outreach to the actual peninsula residents before adopting any changes.

Regarding the master parcel merger, I am deeply concerned that unlocking new development footprints gives the developer (Danco) a green light to proceed with entirely new projects before completing the necessary remodeling, rehabilitation, and sale of the historic homes within the existing community. The plan should explicitly mandate that these revitalization milestones must be completed before new development phases can break ground.

Furthermore, there should be stricter enforcement and penalties surrounding project timelines. For example, the current utility replacement project has taken roughly twice as long as promised, leaving residents to endure dusty roads, construction noise, and frequent utility outages far longer than anticipated. I am concerned that the construction of the heavy-lift marine terminal will similarly exceed its timeline, forcing Samoa residents to once again bear the impact of prolonged construction.

The plan also fails to protect the existing town's infrastructure from the impacts of heavy construction and increased traffic. There must be a strict policy requiring a comprehensive, funded plan for road paving, drainage, and ongoing road maintenance in the historic town of Samoa before any additional residential or commercial development is allowed to begin.

Additionally, while the current draft emphasizes updating policies to reflect an increased understanding of sea-level rise and tsunami run-up hazards, the proposed townhomes located directly behind the Samoa Block sit at a highly vulnerable elevation. Averaging only around 13 feet, this is well below the 35-foot safety threshold. Approving high-density residential development in a known low-lying hazard zone directly contradicts the stated goals of updating the HBAP for climate resiliency. There should be tighter restrictions on new mixed-use development in these low-lying areas, as these locations will become completely uninhabitable if a tsunami compromises the ground floor.

I'm also concerned with the wholesale deletion of the mandates originally found in STMP (New Development) Policy 7 regarding minimizing energy demands and vehicle miles traveled. While state building codes cover basic energy efficiency, deleting the explicit text calling for "interdependent uses... including adequate grocery and convenience stores in the revitalized downtown area" leaves the community incredibly vulnerable. Without a localized mandate requiring a dedicated grocery store with an adequate food supply, Samoa will remain a food desert, forcing residents to commute off the peninsula for basic necessities and directly increasing vehicle miles traveled. When I purchased my home in Samoa I was told there would be a store created in the historic Samoa Block, but those plans have been replaced with the development of a multi story housing complex that doesn't appear to match the town's existing character.

Ultimately, the HBAP should protect and prioritize the existing residents of Samoa, not just pave the way for expedited new development. I request that the Planning Department pause the approval of the STMP overlay updates until direct community consultation is conducted and the policies are amended to include strict infrastructure phasing, hazard re-evaluations for low-lying areas, and a binding requirement for local commercial food services.

Thank you for your time and consideration of these critical community impacts.

Regards,

Jesse Lopez

Samoa Resident

12 Fenwick, Samoa CA 95564



HBAP comments

From Justin Mojonnier <justin@pacificflake.com>

Date Tue 6/30/2026 5:49 PM

To LongRangePlanning@co.humboldt.ca.us <longrangeplanning@co.humboldt.ca.us>

 1 attachment (74 KB)

HBAP comment.pdf;

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Dear Planning Department Staff,

Please find attached my formal public comments regarding the June 2026 Public Draft of the Humboldt Bay Area Plan (HBAP).

These comments are submitted on behalf of local zero-input coastal food producers, specifically Pacific Flake Sea Salt and Sunken Seaweed. The attached letter details necessary updates to Chapter 5 (Definitions) and zoning overlay policies to ensure the growth of coastal dependent food producers.

Thank you for your time, your work on this comprehensive update, and your support of the Blue Economy. Please confirm receipt of this comment letter for the official record.

Sincerely,

Justin Mojonnier

Dear Planning Department Staff and Commissioners,

As commercial coastal-dependent food producers (Pacific Flake Sea Salt and Sunken Seaweed) operating in Humboldt Bay, I am writing to provide formal comments on the June 2026 Public Draft of the Humboldt Bay Area Plan (HBAP). Humboldt Bay's clean, cold, nutrient-rich waters are an irreplaceable resource for culinary sea salt and regenerative seaweed industries. To ensure these vital, zero-input coastal food producers are protected from displacement and supported by local zoning, we request the following specific policy integrations:

1. Establish "Principal Permitted Use" Parity & Define Food Producers While traditional aquaculture enjoys "Principal Permitted Use" status in Coastal-Dependent Industrial (MC) and Resource Dependent (MR) zones, sea salt extraction is currently omitted from the draft. This omission risks trapping zero-input salt producers in burdensome Conditional Use Permit processes and disqualifying them from federal USDA food-system grants. We request that Chapter 5 (Definitions) officially define "Coastal-Dependent Food Production" as water-dependent cultivation, rearing, harvesting, or primary processing of marine foods, bivalves, macroalgae, and sea salt. This definition explicitly encompasses all appurtenant upland support infrastructure physically requiring water access to function, including intakes, outfalls, pump stations, tanks, and evaporation tables. Furthermore, we request this unified use be codified as a Principal Permitted Use across MC, and upland portions of MR zones. Finally, we request that the County apply a protective "Food Production Overlay" to vacant parcels and existing compliant food-production facilities to build a regulatory buffer against displacement by non-food industrial developments.

2. Regulatory Parity with the "Port Overlay Zone" (Setbacks & Shoreline Armoring) Section 3.13 establishes a "Port Overlay Zone" for the heavy lift marine terminal, which explicitly allows for the relaxation of Environmentally Sensitive Habitat Area (ESHA) regulations to accommodate the wind industry. We request this same regulatory flexibility. Water-dependent food producers physically cannot move intake lines, tanks, or other infrastructure 100 feet inland. The HBAP must include a policy exempting Coastal-Dependent Food Production from rigid 100-foot wetland and ESHA buffers, provided impacts are minimized.

3. Infrastructure Grant Prioritization for Empty Waterfronts Humboldt County contains vacant industrial shoreline that is ideal for sustainable coastal-dependent food production. We ask the County to insert a policy in the Public Works chapter explicitly prioritizing public utility upgrades (clean water and sewer) to these specific areas under the banner of "Coastal-Dependent Food Production." This statutory language will make our

local enterprises highly competitive for federal USDA and state infrastructure grants, bringing outside investment to revitalize our working waterfronts.

4. Programmatic Permitting to Catalyze the "Blue Economy" To cut through the multi-agency red tape that stifles emerging regenerative food sectors, we request a policy directing the County to facilitate Master Coastal Development Permits (CDPs) and Programmatic Environmental Reviews (PEIR) for Coastal-Dependent Food Production facilities.

Thank you for your time and commitment to growing and protecting Humboldt's working waterfronts.

Sincerely,

Justin Mojonnier and Torre Polizzi
Owner of Pacific Flake and Sunken Seaweed
justin.mojonnier@gmail.com
(760) 497-5948

A handwritten signature in black ink that reads "Justin Mojonnier". The script is fluid and cursive, with the first letter of "Justin" being a large, stylized capital 'J'.



HBAP Comments

From Justin Mojonnier <justinm@hogislandoysters.com>

Date Tue 6/30/2026 5:44 PM

To LongRangePlanning@co.humboldt.ca.us <longrangeplanning@co.humboldt.ca.us>

 1 attachment (86 KB)

HBAP comments.pdf;

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Dear Planning Department Staff,

Please find attached my formal public comments regarding the June 2026 Public Draft of the Humboldt Bay Area Plan (HBAP).

These comments are submitted on behalf of the commercial shellfish aquaculture industry. They outline specific policy requests to protect Humboldt Bay's critical role in the West Coast bivalve supply chain, ensure CDPH water quality compliance, and establish regulatory parity for coastal-dependent food producers.

Thank you for your hard work on this draft and for your commitment to protecting Humboldt's working waterfronts. Please confirm receipt of this comment letter for the official record.

Sincerely,

Justin Mojonnier

--

Justin Mojonnier

Director of Science and Technology

Hog Island Oyster Company

1 Bivalve Way

Samoa, CA 95564

Cell Phone: 760-497-5948

Dear Planning Department Staff and Commissioners,

As a member of Humboldt County's commercial shellfish aquaculture industry, I am writing to provide formal comments on the June 2026 Public Draft of the Humboldt Bay Area Plan (HBAP). Humboldt Bay acts as a critical piece of the shellfish supply chain for the entire west coast. In 2025 between all shellfish operators, we produced close to 10 million market ready oysters (55% of California's production) and we produced over 450 million shellfish seed (supplying over 100 farms up and down the west coast). Humboldt Bay is home to California's largest shellfish hatchery (Hog Island Oyster Co.), nursery (Taylor Shellfish), and market product (Pacific Seafood) producers. To maintain Humboldt Bay's position as California's premier sustainable mariculture hub and align with the Ocean Protection Council's new Statewide Marine Aquaculture Action Plan, we request the following specific policy integrations:

1. Apply a Food Production Overlay to Vacant Sites to Unlock New Harvest Waters

Currently, the California Department of Public Health (CDPH) restricts aquaculture expansion in areas beyond Arcata Bay because our general industrial zoning allows shoreline parcels to theoretically be developed into heavy, polluting uses, regardless of current status. We request that a "Coastal-Dependent Food Production Overlay" be applied to vacant and underutilized Coastal-Dependent Industrial (MC) and Resource Dependent (MR) parcels, as well as to existing occupied facilities that currently meet zero-discharge performance standards. By applying this overlay—and its associated zero-discharge mandates—to both undeveloped land and compliant existing operations, the County will eliminate the "potential pollution" risks that limit expansion of aquaculture in Humboldt Bay. Protecting these upland sites will give confidence to CDPH and will protect our ecosystems.

2. Regulatory Parity with the "Port Overlay Zone" (Buffer Exemptions)

Section 3.13 establishes a "Port Overlay Zone" for the heavy lift marine terminal, which explicitly allows for the relaxation of Environmentally Sensitive Habitat Area (ESHA) regulations to accommodate the wind industry. As we are also identified as a Priority Coastal-Dependent Use, we request this same regulatory flexibility. The HBAP must include a policy that exempts "Coastal-Dependent Food Production" from strict 100-foot wetland and ESHA buffers for necessary water-dependent infrastructure (e.g., pump stations, hatcheries, and tanks), provided impacts are minimized.

3. Programmatic Permitting to Cut Red Tape

To fulfill the state mandate for permitting efficiency, we request a policy in the HBAP stating: *"The County shall actively support and facilitate Consolidated Coastal Development Permits (CDPs) and Programmatic Environmental Impact Reports (PEIR) for*

Coastal-Dependent Food Production to streamline the expansion of sustainable aquaculture in Humboldt Bay."

4. Prioritize Tribal Co-Stewardship in Chapter 2

We support the new Environmental Justice and Tribal History sections in Chapter 2. We request a policy explicitly promoting "co-stewardship agreements between commercial aquaculture and local Tribes for native shellfish restoration," which will position the bay to capture unique federal and state environmental justice grants.

Thank you for your time and commitment to protecting Humboldt's working waterfronts and we welcome any interest by department staff or commissioners in taking tours of our facilities and learning more about an industry that relies on the clean waters of Humboldt Bay.

Sincerely,

Justin Mojonnier
Director of Science and Technology
Hog Island Oyster Company
Justinm@hogislandoysters.com
(760) 497-5948

A handwritten signature in cursive script that reads "Justin Mojonnier".



Public Comment on HBAP Public Draft June 2026 –Samoa Town Master Plan/STMP-LUP Revisions

From Kelly Terry <kellytinpg@gmail.com>

Date Tue 6/30/2026 10:24 AM

To LongRangePlanning@co.humboldt.ca.us <longrangeplanning@co.humboldt.ca.us>

 1 attachment (22 KB)

Samoa Town Plan Public Comments.pdf;

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Subject: Public Comment on HBAP Public Draft June 2026 – Samoa Town Master Plan/STMP-LUP Revisions

Dear Humboldt County Planning Staff, Planning Commissioners, and Members of the Board of Supervisors,

My husband and I own our home and live at 780 Vance Avenue in Samoa. I am writing in regard to the proposed changes to the Samoa Town Master Plan.

I am blessed to have wonderful, articulate, and thoughtful neighbors here in Samoa, and I know several of them have written public comment on this issue as well and have expressed many concerns about zoning and some of the more technical aspects of this proposed change. I appreciate their comments and agree with those concerns.

My comment is more of a common-sense variety.

The desire to suddenly switch up the Samoa Town Plan to eliminate the promised town center and replace it with an ambitious apartment complex project reminds me of an experience I sometimes have with any of my six grandchildren.

Sometimes we will be enjoying a family meal when one of the children will say “Can I have more mashed potatoes?” even when there is a fair quantity of said potatoes on their plate. Common-sense elders will say “Of course! But let’s finish the potatoes you have and then I’ll help you serve yourself more.”

This small occurrence is so much like what is going on here in Samoa. The original town plan calls for many changes and upgrades, and at this point I can’t say I’m impressed with the stewardship of our town, the resource entrusted to you and to the private entity that owns it. On Cadman Court, right behind our house, there are raccoons breeding in the derelict houses. Lead-based paint peels from walls in various places. Our streets have been torn up, we are facing daily dust issues, my husband who intermittently uses a wheelchair cannot take a spin around our block, and we have been told to chill out and wait two years for them to be resurfaced. The Samoa Cookhouse project has not even begun. Now granting the permission for a large apartment complex to be built here is so much like a child with a mound of mashed potatoes on their plate asking for more!

Whatever the merits of the proposed changes to the town plan may be are not the relevant point. I would say please finish the other things you have been entrusted to do over the course of over twenty years of private ownership by one entity of Samoa. When you have finished those things, then it is time to consider whether more should be added.

Just a few common-sense musings from a parent to four, grandma to six, and retired schoolteacher to hundreds.

Thank you,

Kelly Terry

Subject: Public Comment on HBAP Public Draft June 2026 – Samoa Town Master Plan/STMP-LUP Revisions

Dear Humboldt County Planning Staff, Planning Commissioners, and Members of the Board of Supervisors,

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This small occurrence is so much like what is going on here in Samoa. The original town plan calls for many changes and upgrades, and at this point I can’t say I’m impressed with the stewardship of our town, the resource entrusted to you and to the private entity that owns it. On Cadman Court, right behind our house, there are raccoons breeding in the derelict houses. Lead-based paint peels from walls in various places. Our streets have been torn up, we are facing daily dust issues, my husband who intermittently uses a wheelchair cannot take a spin around our block, and we have been told to chill out and wait two years for them to be resurfaced. The Samoa Cookhouse project has not even begun. Now granting the permission for a large apartment complex to be built here is so much like a child with a mound of mashed potatoes on their plate asking for more!

Whatever the merits of the proposed changes to the town plan may be are not the relevant point. I would say please finish the other things you have been entrusted to do over the course of over twenty years of private ownership by one entity of Samoa. When you have finished those things, then it is time to consider whether more should be added.

Just a few common-sense musings from a parent to four, grandma to six, and retired schoolteacher to hundreds.

Thank you,

Kelly Terry



HBAP Public Draft June 2026 — Samoa Town Master Plan / STMP-LUP Revisions

From Kevin Beatty <kevinbeatty2@gmail.com>

Date Tue 6/30/2026 1:13 PM

To LongRangePlanning@co.humboldt.ca.us <longrangeplanning@co.humboldt.ca.us>

Cc Rachel Poole ❤️ <poole0722@gmail.com>

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Hello Humboldt County Planning Staff, Commissioners, and Supervisors,

As Samoa residents and homeowners, my spouse and I are writing to voice our concern about the proposed changes to the Humboldt Bay Area Plans, specifically related to the Samoa changes. The existing plan was a key factor in our decision to purchase a home here in Samoa, and we were discouraged to learn that it may be changed significantly from the plan that convinced us to live here.

We purchased our home in Samoa largely based on the existing approved plan. We have been watching as the other homes in our community are renovated, and we look forward to their eventual completion. We greatly appreciate that the renovations follow the historic character and layout of the small town.

We have observed Danco Group's "Samoa Block" web page here: <https://www.danco-group.com/projects/samoa-block> (attached as "The Samoa Block | Danco Group.html") and absolutely do not want this proposed structure built in our historic town. The Samoa Block page references other "Similar Projects" such as:

- "Creamery Row Townhomes" linked here: <https://www.danco-group.com/projects/creamery-row-townhomes> and attached as "Creamery Row Townhomes | Danco Group.html"
- "Aster Place" linked here: <https://www.danco-group.com/projects/aster-place> and attached as "Aster Place | Danco Group.html"
- "The Lodge at Eureka" linked here: <https://www.danco-group.com/projects/the-lodge-at-eureka> and attached as "The Lodge at Eureka | Danco Group.html"

An apartment complex, townhome, or structure similar to the above examples, which are listed by Danco as "Similar projects" to the proposed housing addition in Samoa, is not welcome and does not belong in this historic neighborhood.

We've been eagerly anticipating the town center/market area's completion in the area where the old fire station is currently positioned. This much-needed addition to our historic neighborhood would serve as a hub for our community, providing a space for small events, shopping, and general community engagement. This development was a significant factor in our decision to move to Samoa when we purchased our home.

In addition to the specific concerns about this structure above, we are also severely disappointed that none of these changes have been thoroughly explained to our neighborhood and that we were given such a short time to voice our concerns.

We do not feel that we were adequately consulted about the proposed changes to our own community, and we are left with a number of questions. We've included some below:

- Who requested these changes? The community does not want them.
- Many homes on Vance have children who play outside. What will be done to mitigate the safety risks from additional traffic generated by so many new residents?
- What will be done to mitigate the added noise pollution that we would expect from so many new residences?
- With the draft plan, is there a possibility that these buildings will become even larger than what is shown on Danco's website in the Samoa Block page examples listed above (such as high-density apartments)? What is the limit on the

size/number of units that could be built with the draft plan?

— What will be done to compensate for the added burden on our emergency services?

We demand a thorough explanation of each change in the draft before anything is approved. This is being pushed through too quickly without adequate consultation of the residents in Samoa.

Thank you for your consideration.

Sincerely,

Kevin Beatty & Rachel Poole
Samoa Residents and Homeowners
110 Sunset Ave, Samoa, CA 95564



Public Comment Regarding the June 2026 HBAP Public Draft and Samoa Town Master Plan Revisions

From Lauren Barone <laurenjbarone@gmail.com>

Date Wed 7/1/2026 2:12 PM

To LongRangePlanning@co.humboldt.ca.us <longrangeplanning@co.humboldt.ca.us>

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

I am writing as a homeowner and resident of Samoa to submit a public comment regarding the June 2026 HBAP Public Draft and the proposed revisions to the Samoa Town Master Plan.

My husband and I have lived in Samoa for more than six years and chose to invest in this community because of its unique coastal character, small-town atmosphere, and sense of peace. We purchased our home believing we were becoming part of a quiet neighborhood where thoughtful growth would preserve the qualities that make Samoa special.

Instead, our neighborhood has become, and appears likely to remain, a construction zone for the foreseeable future. As a homeowner, I am deeply concerned about the long-term impacts these proposed revisions could have on our quality of life, property values, and the overall character of our community.

The proposed large-scale developments appear to move forward without the supporting infrastructure that should come first. Before approving additional housing projects, I believe the County should first address the basic needs of the residents who already live here.

Our community is already experiencing ongoing challenges, including:

- Frequent road construction, damaged roads, and traffic disruptions.
- Regular water shutoffs due to construction projects.
- Repeated power outages related to ongoing development.
- Constant noise, dust, and construction activity that affects daily life.
- Limited local services, amenities, and infrastructure to support existing residents.

These issues already have a significant impact on our daily lives. Adding hundreds of additional homes before these problems are resolved will only place greater strain on an already stressed community.

I am especially concerned about the proposed development of approximately 200 homes directly in front of my neighborhood. This represents a significant change to the area and deserves meaningful public discussion. Developments of this scale will permanently alter the character of Samoa, yet many residents feel they have had little opportunity to participate in shaping these decisions.

One of my greatest concerns is the lack of communication and transparency. As someone who has invested in this town, I often feel that major decisions are being made without adequate outreach to the people who live here every day. Homeowners and long-term residents deserve more than simply

being informed after plans have been drafted. We deserve meaningful opportunities to provide input before significant decisions are made.

Growth itself is not my concern. I understand that Humboldt County needs housing and that Samoa will continue to evolve. However, growth should be intentional, responsible, and supported by infrastructure that protects both existing residents and future ones. Roads, utilities, public services, emergency access, and community amenities should be expanded before additional large-scale development is approved.

I also ask the County to carefully consider the cumulative impacts of continuous construction over what could be decades of development. Living in an active construction zone year after year affects residents' physical well-being, mental and physical health, property enjoyment, and confidence in the future of our community.

Samoa is a small coastal town with a unique identity that cannot be recreated once it is lost. I hope the County will take the time to listen carefully to the people who call Samoa home and ensure that future planning reflects not only housing goals, but also the long-term health, livability, and character of this community.

Thank you for considering my comments. I respectfully ask that these concerns become part of the public record and that the County continue to engage residents in an open, transparent, and collaborative planning process as these revisions move forward.

Sincerely,

Lauren Barone
Homeowner and Resident of Samoa



Outlook

Samoa HBAP Public Comment

From Matthew Hinshaw <matthewhinshaw77@gmail.com>**Date** Tue 6/30/2026 12:03 PM**To** LongRangePlanning@co.humboldt.ca.us <longrangeplanning@co.humboldt.ca.us> 1 attachment (86 KB)

Hinshaw, Matt - Public Comment_HBAP Draft June 2026.pdf;

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Dv-laa-ha~ (Hi),

My name is Matthew Hinshaw and I live in the town of Samoa. I have attached a comment on proposed updates made to the Humboldt Bay Area Plan (HBAP). There are some concerns I share with many other residents and it would be greatly appreciated if our comments are reviewed and taken seriously. Hope the rest of your day goes great.

shu' shaa nin-la (thanks),
Matt Hinshaw

Subject: Support for Revisions and Additional Community Review of Samoa HBAP/STMP Changes

Dear Humboldt County Planning Staff, Planning Commissioners, and Board of Supervisors,

I am writing to express my support for the concerns and recommendations raised regarding the Samoa-specific revisions in the June 2026 Public Draft Humboldt Bay Area Plan (HBAP).

I support responsible housing development, including affordable housing opportunities in Samoa. However, I believe any significant changes to the Samoa Town Master Plan Land Use Plan (STMP-LUP) should be fully explained, openly discussed with residents, and carefully evaluated before adoption.

Samoa is a unique historic community with limited infrastructure, evacuation routes, and public services. Changes affecting residential density, development sequencing, infrastructure requirements, and community character deserve meaningful public review and transparency.

I support requests that the County:

- Provide a clear explanation of all substantive Samoa-specific revisions and their intended effects.
- Hold a public workshop in Samoa so residents can better understand and comment on the proposed changes.
- Clarify how density bonuses and affordable housing provisions could affect future development intensity and building scale within Samoa.
- Ensure that new housing projects remain compatible with Samoa's historic character and small-town coastal setting.
- Maintain enforceable requirements for infrastructure, public access improvements, historic preservation, public safety, and community benefits before major new development proceeds.
- Evaluate potential impacts on traffic, parking, emergency evacuation, wastewater capacity, coastal views, and overall neighborhood livability.

I believe Samoa residents support thoughtful growth, housing opportunities, historic restoration, environmental protection, and public access improvements. However, these goals should be achieved through a transparent planning process that fully engages the community and preserves the qualities that make Samoa a special place to live.

I respectfully urge the County to provide additional public outreach, clarify the proposed revisions, and ensure appropriate safeguards are in place before adopting the Samoa-specific HBAP changes.

Thank you for your consideration.

Sincerely,

Matthew Hinshaw

Samoa Resident



Outlook

Public Comment on the Humboldt Bay Area Plan – Samoa Redevelopment and Community Impacts

From Michael Feldman <michaelfeldman88@gmail.com>

Date Mon 6/29/2026 1:48 PM

To LongRangePlanning@co.humboldt.ca.us <longrangeplanning@co.humboldt.ca.us>

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Dear Humboldt County Planning Staff, Planning Commissioners, and Members of the Board of Supervisors,

My name is Michael Feldman. I am both a homeowner in Samoa and an environmental consultant licensed by the State of California as a Certified Asbestos Consultant (CAC) and a CDPH Lead Inspector/Assessor. I support thoughtful planning, historic preservation, and responsible housing development. However, I am deeply concerned that the cumulative impacts of the ongoing redevelopment of Samoa are not being adequately considered before additional projects move forward.

I appreciate many of the concerns already raised by other community members regarding public participation, historic preservation, and transparency in the Humboldt Bay Area Plan. I share those concerns and believe they deserve careful consideration before significant changes are adopted.

In addition, I believe the County should give much greater consideration to the real-world impacts that prolonged redevelopment has had—and continues to have—on the people who already live here.

From my professional perspective, large-scale demolition, rehabilitation, and redevelopment projects require careful management of environmental hazards, particularly lead-based paint, lead-contaminated dust, asbestos-containing materials, and other construction-related exposures. While these hazards can be managed safely when appropriate controls are consistently implemented, Samoa has experienced redevelopment activities over a much longer period than originally anticipated. The cumulative duration of these projects raises legitimate questions about repeated exposure potential for nearby residents, children, pedestrians, and those who live adjacent to active work areas.

As someone whose professional responsibility is evaluating lead hazards and hazardous building materials, I believe cumulative environmental health impacts deserve more attention than they have received. Individual projects are often evaluated independently, but residents experience them collectively. Months and years of construction activity are very different from isolated short-term projects. Before additional phases of redevelopment are approved, I encourage the County to evaluate these cumulative impacts more comprehensively.

My concerns extend beyond environmental health. The prolonged redevelopment has also changed the day-to-day conditions within Samoa. Increased traffic, construction activity, temporary housing, and extended project timelines have created ongoing disruptions that affect residents' quality of life.

Personally, I experienced one example of these impacts when my legally parked vehicle was struck by an uninsured driver (\$8000+ in body damage) residing in the temporary housing developed as part of the current project. While any single traffic incident can occur anywhere, it illustrates how extended projects can produce secondary impacts that were likely never intended to persist for years beyond the original construction schedule.

The concern is not simply about one accident. Rather, it is about whether the County has adequately considered how prolonged construction, additional population, traffic patterns, parking demands, infrastructure limitations, and future redevelopment phases interact over time. The current redevelopment remains incomplete, yet discussions are already occurring regarding additional projects. Before expanding development further, I believe there should be a careful evaluation of how the existing project has affected the community and whether promised timelines, infrastructure improvements, and mitigation measures have been achieved.

Samoa is a unique community situated on one of California's most beautiful peninsulas. It is not simply a development opportunity—it is a historic town, a residential neighborhood, and an environmentally sensitive area bordering Humboldt Bay. Decisions made today will shape the character, health, and safety of this community for generations.

I respectfully ask the County to slow the approval of additional Samoa-specific development proposals until the current redevelopment has been thoroughly evaluated. This evaluation should include not only planning objectives but also cumulative environmental health considerations, traffic and public safety impacts, infrastructure capacity, project completion timelines, and the lived experiences of existing residents.

Growth can and should occur responsibly. However, responsible growth requires accountability, transparency, and a willingness to examine whether current development has achieved its intended goals before approving additional phases.

Thank you for your consideration and for taking the concerns of Samoa residents seriously.

Sincerely,

Michael Feldman
Samoa Homeowner



Outlook

HBAP Public Comment

From Paul C <pcasken@gmail.com>**Date** Mon 6/29/2026 2:16 PM**To** LongRangePlanning@co.humboldt.ca.us <longrangeplanning@co.humboldt.ca.us> 1 attachment (17 KB)

Samoa HBAP.docx;

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Good afternoon,

Please see attached Public Comment concerning the Humboldt Bay Area Plan Update.

Thank You,

Paul Casken

Dear Humboldt County Planning Staff, Planning Commissioners, and Members of the Board of Supervisors,

My name is Paul Casken, and I'm writing on behalf of myself and Mason London. We are homeowners and residents of Samoa. We appreciate the work that has gone into updating the Humboldt Bay Area Plan and recognize the importance of planning for housing, economic development, public safety, and historic preservation. However, we are concerned that the Samoa-specific revisions are moving forward without adequate opportunity for the people who live and own property here to understand and comment on the changes that will shape the community for decades to come.

Our first concern is the future of the former Samoa Fire Station, commonly known as the Samoa Block. This building is one of the defining landmarks of Old Samoa and an important part of the town's history and identity. The draft HBAP appropriately emphasizes preserving Samoa's historic character, yet one of its most recognizable historic buildings is now being considered for demolition.

The Samoa Block has visibly deteriorated over many years. I am concerned that years of deferred maintenance could ultimately be used to justify demolition rather than restoration. This would set a troubling precedent for historic preservation in Samoa. The ongoing rehabilitation of the Camden Court homes demonstrates that buildings suffering from significant deterioration can often be restored when preservation becomes a priority. We ask the County to ensure that every reasonable effort to rehabilitate the Samoa Block is exhausted before demolition is considered and that any determination that the building cannot be saved be supported by independent structural and historic preservation evaluations.

Our second concern is the proposed revisions to the Samoa Town Master Plan, including the reparceling and changes to the master parcel structure. These appear to be significant changes that could affect the timing, scale, and character of future development in Samoa. Yet many residents and property owners have only recently become aware of these revisions and have had little opportunity to fully understand their implications or provide meaningful input.

Samoa is a small community, and these decisions will have lasting consequences for the people who live here. We believe both homeowners and residents deserve a transparent process that allows adequate time to review the proposed changes, ask questions, and participate before the plan is adopted.

We respectfully request that the County slow the adoption of the Samoa-specific portions of the HBAP and take additional steps to engage directly with the community before moving forward. Specifically, we ask the County to:

- Hold at least one public workshop in Samoa dedicated to the proposed Samoa Town Master Plan revisions.
- Clearly explain the purpose and effect of the proposed reparceling and other Samoa-specific changes in plain language.
- Provide residents with sufficient time to review those changes before adoption.
- Ensure that community input is genuinely considered before final action is taken.

We support thoughtful growth in Samoa, including appropriate housing, infrastructure improvements, and continued economic development. However, these goals should not come at the expense of meaningful public participation or the preservation of the historic character that makes Samoa unique.

We ask that the County take the time to work collaboratively with the Samoa community before adopting changes that will shape the town's future for generations.

Thank you for your time and consideration.

Sincerely,

Paul Casken

Samoa Homeowner
Former Samoa Resident

Mason London

Samoa Homeowner and Current Resident



Fw: HBAP Plan Update

From Ford, John <JFord@co.humboldt.ca.us>

Date Wed 7/1/2026 5:11 PM

To Yandell, Rodney <RYandell@co.humboldt.ca.us>; Meighan, Reanne <rmeighan@co.humboldt.ca.us>

John H. Ford
Director of Planning and Building
(707) 268-3738



Effective July 1, 2024, the Humboldt County Planning and Building Department will reduce the in-person counter service hours. The new hours of operation will be from 8:30 a.m. to 2:00 p.m., Monday through Thursday, with the counter closed on Fridays.

From: Beth Burks <bburks@redwoodenergy.org>

Sent: Wednesday, July 1, 2026 4:30 PM

To: Ford, John <JFord@co.humboldt.ca.us>

Subject: HBAP Plan Update

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Hi John,
I know this is technically a day late for the public comment period, but I wanted to run something by you.

First, great job on updating the HBAP. It has been a long time coming! I attended the meeting on June 16 and it was great to see how it is shaping up.

I read through the plan with my RCEA lens and think it is well aligned with RCEA's strategic plan, and the RCAP. I had just a couple of suggestions/questions:

I was reviewing Section 3.4 ***30253 *Minimization of Adverse Impacts (c) Minimize energy consumption and vehicle miles traveled.*

I am not seeing much specificity for how this will be accomplished through the other development policies. I am wondering if there is a way to incorporate some detail.

Something to the effect of:

New development shall minimize energy consumption and vehicle miles traveled and should, where feasible, incorporate energy-efficient design, building electrification, renewable energy systems, electric vehicle charging infrastructure, and other measures that reduce greenhouse gas emissions and increase community resilience.

I also saw in section 4.1: ~~Oil and~~ Natural gas pipelines and electrical transmission lines are allowed in all land use designations, in accordance with Sections 3.14B (5) and (6), in both urban and rural areas, by conditional use permit.

I am wondering if similar to oil being removed if natural gas can also be eliminated or limited to only replacement of existing infrastructure?

Thanks for your consideration. I will be out of the office through Monday, but happy to chat after that if you would like.

Thanks,
Beth

Elizabeth "Beth" Burks

Executive Director | Redwood Coast Energy Authority

Office (707) 269-1700 x 302 | Cell (707) 572-7947 | www.RedwoodEnergy.org

Email: bburks@redwoodenergy.org

Pronouns: She/her

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Public Comment - HBAP Public Draft June 2026

From René DeWees <renedewees@gmail.com>

Date Mon 6/29/2026 7:53 PM

To LongRangePlanning@co.humboldt.ca.us <longrangeplanning@co.humboldt.ca.us>

 1 attachment (41 KB)

HBAP Public Draft June 2026_PubCmnt_RD.pdf;

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Hello,

Attached here is my public comment on the HBAP Public Draft June 2026 regarding the revisions made to the STMP-LUP.

Thank you,

René DeWees

Subject: Public Comment on HBAP Public Draft June 2026 Regarding Revisions to the Samoa Town Master Plan – Land Use Plan (STMP-LUP)

From: René DeWees, Resident of Samoa

Date: June 29, 2026

Dear Planning Commissioners,

As a homeowner in Samoa who is invested in the betterment and overall future of our town, I am submitting this comment. I appreciate the work and diligence put into the Humboldt Bay Area Plan (HBAP) update, but I do have some concerns about how the proposed policies will affect the town and those who live here.

Samoa is a unique and historically rich place. A peaceful old mill town nestled between the ocean, dunes, and bay. Given its unique character, Samoa's land-use policy must be approached with care, transparency, and a clear understanding of the potential impacts on this narrow peninsula. After reviewing the public draft of the HBAP I have some concerns regarding the impact on Samoa and the residents of the town. My first concern is related to the updated sea-level-rise (SLR) and tsunami policies.

Overall, it is a great idea to bolster the hazard preparedness of Samoa and to include policy that ensures that any new development will keep this in mind. However, there is no clear explanation of how existing neighborhoods will meet the new tsunami refuge access standards or how the evacuation routes will be improved. I suggest that the County provide a clear hazard analysis for Samoa on a per-parcel basis. This information could be used to better ensure resident safety by identifying needed improvements to infrastructure, which is something that Samoa desperately needs.

The current infrastructure in Samoa is lacking and will require significant improvement before further development can be considered. Currently the roads in the town are in complete disrepair. Rutted and destroyed by the constant movement of heavy equipment which these roads were not designed to bear. For Samoa to support the level of industry and development proposed in the STMP-LUP, first the roads must be built to handle it. But then how will this affect the historic aesthetic of the town? And furthermore, how will we know that the proposed Samoa Peninsula Wastewater Project (SPWP) will have the capacity to support further growth? I respectfully ask that the County demonstrate that the SPWP, emergency services, and road infrastructure can support both existing residents and future growth proposed by the STMP. The County must also take into consideration the impact that this industry and development will have on the residents of Samoa and ask if

industrial operations are compatible with the small-town character of Samoa. If a push towards industrializing the town is inevitable then it is the responsibility of the County to ensure that the safety and sanity of the town's residents is held paramount. The constant truck traffic, noise, vibration, and light pollution would be a blight on this small town if not handled appropriately.

Lastly, greater transparency and public engagement is needed moving forward. The STMP parcel merger and permitting process need to be simplified so that residents can get a better understanding of how development will occur. I respectfully request clearer timelines, public workshops, and accessible explanations of how the STMP implementation will proceed under the updated HBAP.

Samoa is a unique town and it deserves thoughtful, community-centered planning. While the draft HBAP update modernizes many policies, it also introduces new uncertainties and potential impacts that must be addressed before the STMP-LUP can be implemented.

I ask the County to incorporate stronger protections for residents, including clearer hazard-planning commitments, and more robust community engagement as the HBAP moves forward.

Sincerely,

René DeWees



Sea Level Rise and salt marsh restoration in HBAP

From RScott Greacen <rsgreacen@gmail.com>

Date Tue 6/30/2026 3:53 PM

To LongRangePlanning@co.humboldt.ca.us <longrangeplanning@co.humboldt.ca.us>

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Dear Humboldt County planners:

Thank you for updating the Humboldt Bay Area Plan. This revision is long overdue in light of the challenges we face.

I'm concerned about how the HBAP tries to straddle the gap between two conflicting strategies: protecting existing drained and diked agricultural lands and reconnecting those lands to tidal action while they can still support salt marsh.

The Plan allows itself to be constrained by the history of wetland drainage and agricultural use behind existing levees around Humboldt Bay. It plans to protect those agricultural uses indefinitely and affirms a presumption to rebuild levees and fill wetlands in order to continue those agricultural uses as long as practicable. But those levees and agricultural uses directly conflict with the better option to confront rising sea levels around Humboldt Bay, which is to restore and recover salt marsh, not in piecemeal projects, but at a truly wide scale.

Salt marsh should be restored as fast as possible and as widely as possible around Humboldt Bay for a couple of important reasons. Salt marsh offers the greatest possible resilience to rising and falling saltwater levels, a self-regenerating, self-raising natural armor against storm and tide. No less importantly, salt marsh provides essential habitat for a range of species. We have drained and diked most of it over the past two centuries, and stand to lose much of the rest of it to sea level rise unless we take affirmative steps to restore it. If we lose our salt marshes to sea level rise, we will lose the species that depend upon them. Crucially, If we wait too long, we will lose the chance to reestablish salt marsh, and will gain only additional mudflats as land becomes fully inundated by rising tides. Humboldt Bay does not suffer from a lack of mudflats.

Rather than try to paper over the gap between fundamentally conflicting goals, the Plan should commit to recovering salt marsh wherever possible as soon as possible. Existing levees should be maintained and rebuilt only where absolutely necessary to protect roads and similarly essential public infrastructure, and only until those elements have been relocated to higher elevations. Agricultural uses that depend on levees and tidegates should be given a ten year grace period to relocate to higher elevations.

My concern regarding potential sea level rise in Humboldt Bay is heightened by recent publications regarding the collapse of the Thwaites glacier. The sea level rise likely to be driven by this event has not

generally been accounted for in previous SLR estimates by NMFS and the state of California. According to the International Thwaites Glacier Collaboration website, if "Thwaites Glacier continues to accelerate, retreat, and widen at rates consistent with recent changes, it could contribute several cm to sea-level rise by the end of the century."

Thank you for your consideration.

Scott Greacen
Arcata



Fwd: Public Comment on HBAP Public Draft June 2026

From Susanna Jenny <susannajenny111@gmail.com>

Date Tue 6/30/2026 11:24 AM

To LongRangePlanning@co.humboldt.ca.us <longrangeplanning@co.humboldt.ca.us>

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----- Forwarded message -----

From: **Susanna Jenny** <susannajenny111@gmail.com>

Date: Mon, Jun 29, 2026 at 6:52 PM

Subject: Fwd: Public Comment on HBAP Public Draft June 2026

To: <narroyo@co.humboldt.ca.us>

Hello,

I am forwarding an email I prepared today regarding the the updated changes to the Samoa Town Plan. I am really hoping our concerns can be truly addressed.

Thank you,
Susanna Jenny

----- Forwarded message -----

From: **Susanna Jenny** <susannajenny111@gmail.com>

Date: Mon, Jun 29, 2026 at 5:50 PM

Subject: Public Comment on HBAP Public Draft June 2026

To: <longrangeplanning@co.humboldt.ca.us>

To the Humboldt County Planning Staff,

I am writing as a new homeowner in Samoa, California. I purchased my home on March 20, 2026, after carefully reviewing the Samoa Town Plan that was publicly available at the time. The vision and commitments outlined in that plan played a significant role in my decision to invest in this community.

Only three months later, however, the proposed plans have changed substantially. These revisions no longer reflect the community values, historical character, environmental considerations, or overall vision that influenced my purchase.

As homeowners, we were required to sign documents agreeing not to make alterations that would compromise the historic integrity of our properties and to respect the character of the town. I willingly

accepted those obligations because I believed the same standards would be upheld throughout the community. Instead, I have learned of several significant changes, including:

- The Humboldt Bay Terminal is now expected to exceed previously communicated noise standards.
- A proposed 60-unit apartment building has replaced the planned town square that was presented to prospective buyers.
- The town square has been removed from the plan altogether, while the proposed apartment development appears inconsistent with the historic design guidelines that homeowners were required to follow.
- The existing infrastructure does not appear adequate to support this level of development. Residents are already experiencing periodic power outages with little to no communication from Danco regarding the cause or timeline for resolution.

I have lived in Humboldt County for nearly 20 years. I chose to keep my family, my future, and my investment here because I believed in the vision presented for Samoa. The recent changes threaten not only the quality of life for current and future residents but also the environmental and historical integrity of this unique peninsula.

Had these proposed developments and revisions been disclosed before my purchase, I would not have chosen to buy this property. The sequence of events creates the appearance of a bait-and-switch, in which prospective buyers relied on one publicly presented plan only to see it significantly altered shortly after purchasing their homes. I believe this raises serious concerns regarding transparency and public trust.

There is currently another property pending sale on my street. I respectfully ask whether prospective buyers are being fully informed of these substantial changes to the Samoa Town Plan and the associated impacts on the community.

The residents of Samoa—and Humboldt County as a whole—deserve a transparent planning process that honors the commitments made to homeowners and protects the historical, environmental, and community values that make this area unique. I urge the Planning Department to carefully reconsider these revisions and to ensure that the voices of the residents who have invested their hard-earned money in this community are genuinely considered before these changes move forward.

Thank you for your time and consideration.

Sincerely,

Susanna Jenny



Public Comment on Humboldt Bay Area Plan Update

From tmm52@humboldt.edu <tmm52@humboldt.edu>

Date Tue 6/30/2026 2:41 PM

To LongRangePlanning@co.humboldt.ca.us <longrangeplanning@co.humboldt.ca.us>

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

To Whom It May Concern,

I appreciate the chance to provide comments on the updates to the Humboldt Bay Area Plan (HBAP). I live in Samoa and have been a resident here for about 3 ½ years. My neighbors and I will be affected by the changes in this plan on two major fronts: one is regarding development proposed within our community, and the other is related to the development of a Heavy Lift Marine Terminal (HLMT) abutting our town.

When I purchased my home, I studied the 2007 Design Guidelines for Old Town Samoa, the 2018 Samoa Town Master Plan Land Use and Zoning and Phasing Map, and the 2019 Samoa Master Plan. I was told by the realtor representing Samoa Pacific Group (i.e., the seller) of plans for the Town that differ dramatically from what is now proposed (see references in aforementioned documents and the Danco website of what was planned for the “Samoa Block and Town Square” in the older documents vs. [what is now being proposed](#)). Furthermore, there was no mention of a planned HLMT in the disclosures upon the sale (and I understand that even today that is the case). I have since learned that plans for the HLMT were in the work for quite a while before my sale.

Bottom line, we have now been presented with updates to the HBAP that have potential to negatively affect the health, safety and quality of life of residents here. I have tried to read the planned update to the HBAP, unaided by AI, to understand what actual changes are being proposed regarding density, zoning, changes to health and safety standards, and other potential changes. Even with a doctoral level of education, I do not understand what changes will mean for us in practical sense. I see no maps and am confronted by limited time period to make my comments. That said, I would like to share a few comments at this point:

- More information and considerably more time is needed to provide comments on such an extensive document. Please can the County provide a summarized list of changes that will affect Samoa? Please provide maps with labeled key to show before and after changes to what will be allowed where in the town. Please then allow open Q&A opportunities with the residents of the Town, so that full implication of these changes can be understood.
- Samoa is a Town with a considerable portion of residents having low income (e.g., residents of the Rex Townhomes). Many residents have documented challenges to transportation, food security/access that will be exacerbated by, for instance, taking away the planned “Murphy’s type market” that was touted by the selling developer/realtor. The problem will be made much worse if zoning changes allow for more units that then displace planned and promised amenities for the community (like a grocery store) in the town center.

- **What appears to be a shift toward more medium density housing and other changes may not fit with our town of Samoa, a cultural/historical resource for CA.**
- **Infrastructure improvements, sequencing in development, and timelines for Samoa have not been as promised by the developer. There has been too little attention to providing for safe, consistent water supply and electricity. Communication about sewer improvements and the limitations of existing systems has been inadequate. Any further update to the HBAP should codify to strengthen requirements for adequate water, sewer, and power so that protections of the health of residents is an overriding requirement...and is in place before further development. Plans for emergency services, evacuation, etc must be fully discussed and documented (in a format with “teeth” for violations) prior to any discussion of development withing the Town or adjacent property (i.e., HLMT).**
- **I ask that the plan for a Port Overlay Zone contained in the updated plan (section 3.13.12; which would allow standards to be shifted for things like noise, lighting, sound and vibration for the terminal project) be tabled. This should not move forward without full public discussion and perhaps a thorough review of the pending EIR (with it evidence) for the HLMT. [Please see the 2023 letter from Rob Holmlund](#) I view the County as having a responsibility to monitor Danco and protect our community and likewise to ensure that further development does not negatively affect health and safety of residents. For example, there is an extensive literature that attests to safe levels of “sound”. The current standards conform with that literature. The variances proposed by the Harbor District for sound (and other parameters) may not be healthy for the people. Shifting of standards to conform with a project is backwards...the standards should be based on health and safety criteria.**

Thank you for your consideration.

Sincerely,

Tina Manos, tmm52@humboldt.edu, 707-498-3987



Outlook

Public comment on HBAP Draft June 2026

From Varvara Zeldovich <vbzeldovich@gmail.com>**Date** Mon 6/29/2026 9:41 PM**To** LongRangePlanning@co.humboldt.ca.us <longrangeplanning@co.humboldt.ca.us> 1 attachment (18 KB)

Samoa Public comment.pdf;

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

I am writing to submit public comment. Please see PDF attached.

Thank you for your time

Sincerely,

VZ

Subject: Public Comment on HBAP Public Draft June 2026 — Samoa Town Master Plan / STMP-LUP Revisions

To the Humboldt County Planning Staff & Planning Commissioners,

We are homeowners in Samoa and are writing to provide public comment on the Public Draft June 2026 Humboldt Bay Area Plan - specifically the sections on the Samoa Town Master Plan Land Use Plan overlay.

We purchased a home here in Samoa in 2021 because we loved the town's historic character, scale and the master plan that was originally developed. We were sold the promise that Samoa's historic homes would be restored, water and road infrastructure would be updated, and a myriad of public benefit improvements would be implemented. The timeline for these projects have been, perhaps unsurprisingly, delayed; but the current revisions to the Plan risk erasing these promises and Samoa's historic community character altogether.

We would like to request that the County pause and allow for input from Samoa residents and homeowners before adopting the proposed changes as it will have tremendous effect on our homes and lives. Please see detailed concerns and recommendations in Dave Jannetta's letter to the County, with which we agree.

Thank you for your time and consideration.

Sincerely,

Vera Zeldovich
Josh Dichiacchio
131 Samoa Court. Samoa, CA 95564