

Marisa D'Arpino
PO Box 898
Blue Lake, CA 95525
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To: Michael Richardson, Humboldt Planning Department

RE: Public Comment on the Air Quality Element of the General Plan Update

I am sure that we all want to keep the overall air quality (as well as the water quality which is affected by air quality) of Humboldt County high. Air quality, along with other premier environmental qualities, makes Humboldt County a very desirable place to live. Can we make adequate Air Quality General Plan updates or actual planning decisions for the entire County based on the results of three measurement sites in Eureka, the identification of only one of many pollution factors in the Air Quality element, and measurements made in 2001 (before the latest growth spurt)?

In the three pages of the actual air quality plan (the rest being analysis), I did not see principles, standards, or objectives (as was mentioned at the February 15, 2007 Public Comment session, Humboldt County needs specific, measurable, and fiscally feasible objectives to support its proposed policies). The State Government Code (§65302) requires that general plans spell out the objectives, principles, standards, and proposals of the general plan. The County might wish to consider incorporating much of the "Air Quality Guidelines for General Plans" 2005 revision written by San Joaquin Valley Air Pollution Control District (<http://www.valleyair.org/transportation/Entire-AQGPP.pdf>) that provides a comprehensive template for goals, principles, policies, implementation strategies, and objectives.

Also, the proposed policies and implementation measures appear to focus on new sources of pollutants, perhaps there should be more items (ex. ride-share incentives, promotion of energy saving programs, etc.) that would help mitigate the existing problems.

I would recommend Alternative A with modifications. Below please find detailed comments to the County's Air Quality Element draft, dated February 14, 2007.

Let Humboldt County's planning be better than Santa Clara Valley's (or San Joaquin's). I experienced my home area go from a "Blossom Valley" with miles of orchards and open space to a "Silicon Valley" with high pollution levels, urban sprawl, crowded streets, and other issues within the span of only one generation. I hope that Humboldt County will continue be a great place to live.

Sincerely,
Marisa D'Arpino

DETAILED COMMENTS TO THE AIR QUALITY ELEMENT

1. The Staff Analysis states that for the PM₁₀ pollution factor, "Most of the projected increase in PM₁₀ levels is attributable to increases in emissions from ships and commercial boats (40.0%), unpaved road dust (29%), and paved road dust (27%)."
What policies, objectives, etc. are there to mitigate the affects of these sources??
2. The Staff Analysis says that the North Coast Air Quality District has a draft ""PM10 Attainment Plan" that addresses the status of PM10 air quality standards compliance, emission sources, attainment goals, and control strategies to be pursued toward

compliance.” How is this incorporated into the County’s General Plan or determined that both entities policies and objectives are compatible?

3. The Staff Analysis states that the NCAQD’s report does not include “ Alternatives in this preliminary hearing draft include these programs with the exception of: management of agricultural and forestry related burning; restrictions on residential waste burning; limitations on use-days based on smoke opacity and air quality; and, public education efforts including promoting home weather-stripping to reduce the need for space heating and cooling. Policies and programs to address these additional components of the Attainment Plan could be added.” I suggest that even if the NCAQD does not include these items in their report, that the County include them in the Air Quality element.
4. The Staff Analysis states that “The Natural Resources and Hazards Report identified four main sources of toxic air contaminants in the County: Fairhaven Power Company (Fairhaven), Simpson Timber Company (Korbel); Louisiana Pacific Corp. (Somoa); and, Pacific Lumber Company (Scotia). Pursuant to an Order for Abatement issued by the District’s Hearing Board, the Fairhaven Power Company recently received approval for installation of an electrostatic precipitator (ESP) on the existing lime kiln which will replace the currently operating venturi scrubber as an emission control device.” What policies does the County have in place to promptly detect, mitigate, and significantly fine such major sources of pollution? Perhaps existing policies need to be modified if only one of the four above major sources has been fixed.
5. In the Background section:
 - a. Provide more information about the other elements that make up air quality
 - b. In order to create a baseline, add the other factors (besides Fine Particulate Matter PM₁₀) that make up the County’s overall air quality with the actual readings, forecasts, as well as the State and Federal Standards: ozone (O₃), Carbon Monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂) and lead CO, Visibility Reducing Particles, NOX.
 - c. Include information about the sources that affect the air quality (as found in the Staff Analysis and CEQA report).
 - d. Include Humboldt County specific causes for reduced air quality, such as temperature inversions which stifle the dispersal of air pollutants (from Air Quality http://co.humboldt.ca.us/planning/gp/meetings/natl_res/nr_report.asp)
6. Add a Principles section with [reference “Air Quality Guidelines for General Plans” 2005 revision]:
 - a. Determine air quality impacts of development proposed in their jurisdiction and mitigate those impacts to the maximum extent feasible
 - b. Cooperate with the North Coast Air Quality District, neighboring jurisdictions, and other agencies to reduce air quality impacts
 - c. Ensure that land use and transportation plans are fully integrated and consider air quality
 - d. Work to educate the public on land use, transportation, and air quality issues
 - e. Implement air quality programs for public facilities and operations that are a model for the private sector
 - f. Develop programs and take actions to implement Transportation Control Measures
 - g. Plan land uses to avoid industrial/residential air pollution conflicts
 - h. Reduce PM₁₀ emissions from sources under their jurisdiction or control
 - i. Develop programs to reduce emissions from residential and commercial area sources such as woodburning, energy use, and other and equipment use
7. Add other Air Quality measurement sites (at least in Willow Creek and Garberville/Redway) within one year from the approval of the General Plan Update. The single location in Eureka is not sufficient (Eureka may be fine while at the same time Blue Lake is filled with visible pollutants and other areas of the County are filled with virtually chewable wild fire smoke).
8. Require regularly (hourly) readings in order to be able to quickly identify any air quality problems. We need current readings, not ones that are over six years old.

9. Regularly review the readings (with the North Coast Air Quality District) to determine if the County's plans, policies, and objectives are being met.
10. Develop a way to keep track of the air quality impacts of approved projects. Use this in the business development and project evaluation processes as an individual project may not have a measurable impact; however the projects can have a cumulative effect.
11. Require that new development be designed to promote pedestrian and bicycle access and circulation.
12. Accommodate growth within existing urban areas (infill) as a priority over urban expansion
13. Maximize air quality benefits through selective use of vegetation in landscaping and through revegetation of appropriate areas.
14. Perform a conformity analysis which shall be conducted to assure that transportation, land use, and energy plans, programs, and projects will not impair efforts to meet air quality standards
15. Consider ordinances that encourage residential and commercial builders to go above and beyond State codes to conserve energy and reduce air pollution
16. Goal, Policy, and Implementation Strategy comments-
 - a. **AQ-G1.** Promote the public health, safety, welfare, and environmental quality of the community with improved air quality by:
 - meeting or beating the State and federal air quality standards;
 - reducing emissions of PM10;
 - limiting emissions from new stationary sources of air pollution consistent with State requirements; and
 - buffering existing development from new stationary sources of air pollution consistent with State requirements.
 - b. **AQ-P1.** Through land use and transportation policies, encourage mixed use development, a compact development pattern, to reduce the length and frequency of vehicle trips in areas served by public transit, and alternative modes of travel.
 - c. **AQ-P2.** Through transportation policies, reduce or minimize the creation of "hot spots" or localized places of concentrated automobile emissions.
 - d. **AQ-P3.** Minimize PM10 emissions from new and replacement fireplace inserts and new and replacement woodstoves.
 - e. **AQ-P4.** Minimize PM10 emissions from construction sites ~~for projects involving environmental review and new multifamily residential, commercial and industrial developments resulting in ground disturbance of one acre or more.~~
 - f. **AQ-P5.** Review PM10 emissions monitoring results from the Air Resources Board and implement new land use and transportation policies and regulatory controls to meet State and federal PM10 emissions standards as necessary.
 - g. **AQ-P6.** Reduce emissions of air pollutants from new commercial and industrial development by requiring feasible, workable, monitor able and cost effective mitigation measures based on standards of the District during environmental review of discretionary permits.
 - h. **AQ-P7.** Provide for buffers between sensitive land uses and sources of air pollution or odor. ~~Establish buffers between new commercial and industrial sources of emissions and adjacent land uses on a project by project basis according to the standards of the District during environmental review of discretionary permits.~~
 - i. **AQ-P8.** Implement interagency governance policies to encourage coordination with the District early on in the permit review process to identify expected outcomes and minimize delays for projects involving environmental review and commercial demolition projects that may involve removal of asbestos.
 - j. **AQ- IM1.** Require new and replacement fireplace inserts and new and replacement woodstoves be certified by the Environmental Protection Agency for air quality standards through the building permit process.

- k. **AQ- IM2.** Require implementation of dust suppression measures in all projects involving environmental review and all new ~~multifamily--~~ residential, commercial and industrial developments resulting in ground disturbance of one acre or more.
- l. **AQ-IM3.** Review PM10 emissions monitoring results from the Air Resources Board with future General Plan Housing Element Updates, and implement new land use and transportation policies and other regulatory controls to meet State and federal PM10 emissions standards.
- m. **AQ-IM4** When establishing buffers between new ~~commercial and industrial~~ sources of emissions and adjacent land uses during environmental review of ~~discretionary~~ projects, use the California Air Resources Board's "Air Quality and Land Use Handbook: A Community Health Perspective", and the District's implementation guidelines.
- n. **AQ-IM5.** During environmental review of ~~discretionary~~ projects, evaluate new commercial and industrial sources of emissions using analytical methods and significance criteria approved by the District.
- o. **AQ-IM6.** Expand performance standards for new Cottage Industries to prohibit air emissions in amounts greater than normal for the neighborhood.
- p. **AQ-IM7** Encourage interagency coordination with the District with measures in the Governance Element.
- q. **AQ-IM8** Update the General Plan with new State standards for Greenhouse Gas emissions when they become available.
- r. **FRWK 3292(6)(A) & (B)** Standards require coordination with regulations of the California North Coast Air Basin and the Air Pollution Control Plan for the California North Coast Air Basin.
- s. **FRWK 3260** Reference to possible future limits on wood burning fire places.