

The Healthy Humboldt Coalition

March 8, 2007

Attn: Martha Spencer
Humboldt County Planning Department
Community Development Services
3015 "H" Street
Eureka, California 95501

Re: Air Quality Element GP Update Group 2, Chapter 19

Dear Planning Commissioners:

This letter and supporting documents are being submitted on behalf of the Healthy Humboldt Coalition for inclusion in the board packets for your March 15, 2007 meeting. After reviewing the staff reports and policy options, we would like to offer the following observations and recommendations.

The background report states; "Local measurements by the North Coast Unified Air Quality Management District ("the District") reveal that the County meets all federal standards for air quality and all State standards except for one pollutant – airborne particles that are ten microns in diameter and smaller (PM10)."

The focus of the report, policy, and goal options are then primarily directed at dealing with PM10. This is too narrow a focus. The GP Update is designed to reflect our collective vision of the next 20 years, not a snapshot of today. Many other counties also consider sulfur dioxide, nitrogen dioxide, several gases and oxides, ozone, mercury, lead, asbestos and other potential air contaminants in their AQ ordinances.

Although NCUAQMD figures for PM10 are referenced, as was the case with the Mineral Resources Element (see separate letter submitted for MR Element), APCO Rick Martin was not contacted, so again Healthy Humboldt recommends a liaison be established to formally adopt rules of communication and cooperation between the County Planning Department and the NCUAQMD. In fact, this is the direction suggested in Implementation Measure AQ-IM3 related to future Housing Element updates.

The pulp mill emissions have been a controversial issue for decades, yet slight mention is made of it. Many will be happy to hear that a settlement has just been reached to install a Venturi scrubber by September 2008. Had the county had a clear, comprehensive AQ ordinance and worked more closely with the NCUAQMD, most likely this solution would have been found sooner and not jeopardized so many living wage jobs for so long, not to mention allaying health and safety concerns of many residents.

As in the case of Mineral Resources, where an overlay zone would both protect natural resources and encourage the growth goals of Alternative A, this is another example where a sound environmental policy is also a sound economic policy, thereby laying the groundwork to stabilize and sustain extraction, management and restoration jobs along with the related industries while increasing the potential to attract start ups.

One requirement of the GP Update process is that the elements be consistent with each other. The AQ report mentions asbestos only in relation to building demolition. However, the Mineral Resources report mentions asbestos in relation to mining activities and references the Asbestos ATCM of 2002, which also applies to grading activities. When I talked to County Planner Michael Richardson about this, he replied, "Nice catch!"

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Our letter and supporting documents submitted regarding the Mineral Resources Element outline the current situation with naturally occurring asbestos and details the need to address this important AQ issue locally as well. As was noted, El Dorado County Deputy District Attorney Gloria Mas recently remarked, "Our county Board of Supervisors took a position of zero tolerance on construction-dust violations in areas of naturally occurring asbestos."

El Dorado County's "Naturally Occurring Asbestos and Dust Protection Ordinance" could be used as a model to adapt for Humboldt County. The document with these ordinances can be found at [www.co.el-dorado.ca.us/emd/apcd/PDF/Naturally Occuring Asbestos June 12.pdf](http://www.co.el-dorado.ca.us/emd/apcd/PDF/Naturally_Occuring_Asbestos_June_12.pdf)

Staff report notes that unpaved road dust in Humboldt County accounts for 47% of the PM10 figure, but the policy options seem more heavily focused on other factors. Obviously several options overlap and could be combined, such as those related to fireplaces and wood stoves. We would also advise due consideration of the local firewood products industry, from fuel to manufacturing to retail when finalizing that part of the ordinance.

Though the scope of the report is limited, we concur with the staff conclusions that overall, Alternative Plan A is not only the best environmental alternative, it is also the best economic alternative while maximizing the enhancement of health, safety and quality of life.

With consideration of the above observations and suggestions, the Healthy Humboldt Coalition supports the staff recommendations as listed under "Plan Alternative A" beginning on page 7 of the Preliminary Hearing Draft for Air Quality dated Feb. 15, 2007.

Thanks for your consideration.

On behalf of the Healthy Humboldt Coalition,

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