



rec'd 7/26/07
GPU
W104

TEL (707) 822-7720
FAX (707) 822-7369

P.O. BOX 237 BAYSIDE, CA 95524
880 L STREET ARCATA, CA 95521

CA LIC. #888941 *A California Corp.

July 26, 2007

Humboldt County Planning Commission
3015 H Street
Eureka, CA 95501-4484

Subject: Revisions to Preliminary Hearing Draft for the General Plan Update

Members of the Planning Commission,

Again I thank you for the opportunity to comment on the Humboldt County General Plan Update. I appreciate all the work that you have done on the General Plan which helps community members and organizations submit input for review and inclusion.

Also again I repeat that when I spoke to the Board of Supervisors back on August 24, 2004, I emphasized the need to address more seriously Chapter 18 – Waste Management. From the revisions I have read, I do not see any improvements nor guidance from the IWMP from what was originally in the General Plan. I understand that the intent to integrate the IWMP into the General Plan is appropriate although accountability is in question.

If an example of our JPA (HWMA) to deal with state regulations and revisions to the IWMP is the current situation we have with treated wood waste, I see no economic development, guidance nor improvement of our situation beyond the next twenty years. In this situation, the HWMA knew for two years that Humboldt County was not in compliance. Once the state regulations changed on July 1, 2007, the HWMA decided ten days prior to send out a press release stating that they will no longer accept this material and offered no solution for disposal. Now we, as a business, are storing this material until further notice from the HWMA, possibly in August or September, of a solution. When we contacted the DTSC, they stated we can hold this material for up to a year. When we have enough material, we can hire a licensed hauler and have them haul it to the Anderson Landfill.

The confidence and reliance in the HWMA that they can competently maintain the IWMP for Humboldt County, which has not been adequately revised since 1995, leaves one doubtful. Therefore staff must make recommendations especially since the IWMP was not updated as it was supposed to have been in 2005. Recommendations can be made as guidance to the HWMA.

Besides recommendations, there are at least two important policies that should be included. One important policy for the county would be as follows:

The County will demonstrate its commitment to achieving solid waste goals by instituting waste reduction, recycling and buy-recycled practices at all county facilities and public areas.

By my review, at least a dozen General Plans from within California, have a policy for such. The second policy would be to ensure capacity within the solid waste infrastructure for the processing, recycling, transmission and disposal of solid waste prior to approving new development.

As I have stated before regarding the IWMP, there is no vision beyond the acceptance that we are able to truck all our waste out of the county for the next twenty years. There is no guidance for the future. The IWMP has not been updated to current needs and goals. The lack of infrastructure for some of the waste management issues we currently have here in Humboldt is holding us back. Therefore I recommend that inclusion of new guidelines be included.

The CIWMB is discussing a soon to come diversion rate of 75%. How will we accomplish this if not all jurisdictions within Humboldt County are at the state mandated 50% as indicated in the current revisions to Chapter 18. Only the county has been able to maintain over 50% diversion.

Thank you for your time.

Sincerely,

A handwritten signature in cursive script that reads "Marianne Bithell".

Marianne Bithell
Project Management Assistant