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AUG 08 2007

HUMBOLDT COUNTY
PLANNING DIVISION

August 8, 2007

Mr. Steve Launi, Chairman
Forestry Review Committee
3015 H Street
Eureka, CA 95501

RE: General Plan Update – Forest Resources Policies

Dear Chairman Launi and Committee Members:

Green Diamond appreciates the opportunity to provide comments on the current draft of the Forest Resources Policies. As Green Diamond is the largest landowner in the County, your deliberations and decisions regarding this matter are of extreme interest and concern to us. But let's not forget that there are a lot of TPZ landowners in the County, and the outcome of the General Plan Update process will impact this large group of landowners as well.

Tonight it is my understanding that you will discuss a very important issue:

Compatible density in TPZ areas

Before I reveal Green Diamond's position on this matter I think it's appropriate to take a look at the Critical Choices Report dated March 21, 2001. Way back then the County learned during the scoping process that people wanted decisions based on "solid information":

People want a solid information base for decision making. Phase II will generate the data necessary to support decisionmaking and a defensible General Plan policy framework. The data will be communicated in plain language to foster public involvement in the analysis and development of practical policy alternatives. At each stage, staff will actively seek the participation of individuals, organizations and governmental representatives.¹

My next thought was to find the "solid information" that would help you and the rest of your colleagues on the Forestry Review Committee make a decision on the compatible density question. I inspected the Forest Resources and Policies Discussion Paper and searched for the word "density". My search came up empty. I carefully read the report and I only found one statement related to this issue:

¹ See page 5 of the Critical Choices Report Final Draft dated March 21, 2001.

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However, forest management practices are generally not enhanced with smaller parcel sizes.²

Note that this sentence does not say forest management practices are compromised with smaller parcel sizes. It simply says such practices are generally not enhanced. In any event, I don't believe that the County has assembled "solid information" to support decision makers, such as your Committee, on the compatible density question.

Over the years I have heard many people express their views on this topic. But I value the wisdom and knowledge of consulting foresters with lots of experience preparing Timber Harvesting Plans (THPs) and Nonindustrial Timber Management Plans (NTMPs) in Humboldt County: Jim Able, Chuck Ciancio, and Bill Kleiner. These foresters have all said that small parcels (40 acres and less) can be successfully management for timber production.

My own experience is consistent with the statements of Able, Ciancio, and Kleiner. I live in a neighborhood that is zoned Rural Residential. The parcels vary from 5 to 40 acres. My parcel, which is 10 acres, was harvested in 1991. Every parcel adjacent to mine has been harvested within the last 15 years. Small parcels can and do contribute to Humboldt County's production of timber.

Green Diamond does not want to see its property values decline as a result of changing the home site density associated with the Timber (T) Land Use Designation. There is no data that indicates a problem exists and we concur with the views expressed by experienced foresters such as Able, Ciancio, and Kleiner. We urge the Forestry Review Committee to keep the current home site density provisions in place as defined by the 1982 Framework Plan.

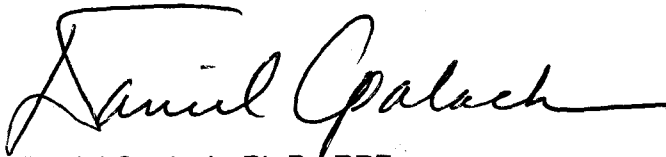
I would also like to take this opportunity to express one more concern. Green Diamond is extremely concerned about the large number of proposed goals, policies, standards, and land use designations associated with this General Plan Update. We submitted a letter to the Planning Commission on this topic during their last meeting on July 26 which I have attached to this correspondence. In a nutshell we would like to see Planning Staff prepare a comprehensive quantitative analysis of the overlapping encumbrances described in each of the chapters, and present this information to the Forestry Review Committee, Planning Commission, Board of Supervisors, and the public. Green Diamond believes that this level of detailed analysis will be needed so that decision makers can make informed critical choices about the cumulative effects of the Plan.

Thank you for this opportunity to share this information with your Committee. Green Diamond looks forward to participating in the General Plan Update process so that the final Plan is good for the County and its hardworking citizens and landowners.

² See page 1-16 of the Forest Resources and Policies Discussion Paper with a revision date of April 2006.

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Sincerely,

A handwritten signature in black ink that reads "Daniel Opalach". The signature is fluid and cursive, with a long horizontal stroke at the end.

Daniel Opalach, Ph.D., RPF
Timberlands Investment Manager
Green Diamond Resource Company
California Timberlands Division

Enclosure

Cc: Bonnie Neely, Chair, Humboldt County Board of Supervisors (w/ enclosure)
Kirk Girard, Director, Humboldt County Planning Department (w/ enclosure)



July 26, 2007

Mr. Thomas Herman, Chairman
Humboldt County Planning Commission
3015 H Street
Eureka, CA 95501

RE: General Plan Update

Dear Chairman Herman and Commission Members:

Green Diamond appreciates the opportunity to provide comments on the General Plan Update. Our comments are intended to be general observations and concerns and we look forward to providing additional input as the process moves forward.

At this juncture the Planning Commission has heard testimony on General Plan Update Chapters from Groups 1, 2, 3, 4, and 5. The chapters within these groups contain goals, policies, standards, and/or land use designations that impact all TPZ landowners in the County. As the General Plan process moves forward the Commission will hear additional testimony on the chapters contained in Groups 6 and 7. These chapters will also contain goals, policies, standards, and/or land use designations that impact all TPZ landowners in the County.

Green Diamond's concern with this process is that it will be very difficult to comprehend the combined impact of all these various elements of the Plan. That is, when all the goals, policies, standards, and land use designations are considered together we may have a Plan that is much more restrictive than intended. The result may be a Plan that doesn't work for the County, excessively devalues property, and has unintended consequences.

To avoid this potential debacle Green Diamond recommends that the Planning Commission direct Planning Staff to:

1. Prepare a comprehensive analysis of the overlapping encumbrances described in each of the chapters.
2. Hold a series of workshops to explain the combined effect of the Plan to the Forestry Review Committee, Planning Commission, Board of Supervisors, and the public.

It is our belief that this level of detailed analysis and review will be needed by the Planning Commission and the Board of Supervisors to make informed decisions about the cumulative effects of the Plan.

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Sincerely,

A handwritten signature in black ink that reads "Dan Opalach". The signature is written in a cursive style with a long horizontal line extending to the right.

Dan Opalach
Timberlands Investment Manager
Green Diamond Resource Company
California Timberlands Division

cc: Bonnie Neely, Chair, Humboldt County Board of Supervisors
Kirk Girard, Director, Humboldt County Planning Department