



Humboldt County Farm Bureau

5601 So. Broadway, Eureka, CA 95503
Serving Agriculture Since 1913

Martha Spencer, Senior Planner
Community Development Services
County of Humboldt
3015 H Street
Eureka, CA 95503

July 3, 2007

Dear Ms. Spencer:

The Humboldt County Farm Bureau has reviewed the Natural Resource / Agricultural Section of the General Plan and we have the following general comments:

Land Use-Natural Resources- ***'No Net Loss'** of privately owned lands through purchase by Federal or State Government.*

Resolution 92-35 adopted by the Board of Supervisors in part provides:

'...the Humboldt County Board of Supervisors goes on record as supporting the concept of "no net loss of privately owned lands" coupled with the concept that the acquisition of any lands by State and Federal Government shall be offset by lands of equal dollar value sold back to the private sector by the government with "no net loss of revenue" to the government to be created by the transactions.'

This or a similar policy needs to be incorporated into the Natural Resources Section of the General Plan.

Entitlements: There is a need to adequately define or describe what the term 'entitlement' means. We keep hearing about the 17-20,000 'entitlements'

located within the Rural Areas of the County. As a result of this perception of entitlement, various additional restrictions or programs meant to reduce or eliminate the impacts associated with the exercise of these impacts are being considered or proposed. We would like to know upon what bases the County is making the determination of the number of entitlements being stated.

If the total number of entitlements is based upon the number of potentially certifiable 'patent parcels' under the Subdivision Map Act, then this should be stated. If the number is based on some projection of a level of development that could potentially be subdivided under the zoning (with or without regard to constraints) then this should be stated.

It is our understanding that a Certificate of Subdivision Compliance, processed under the Subdivision Map Act, specifically provides that the development (structures, roads, etc.) is not automatically authorized with the issuance of the Certificate. The sale, lease or financing of the certified parcel is authorized (assuming the Certificate is not conditional).

Since the patent parcels were originally issued prior to the time of regulation by the state or local government, we do not see how the County can now administratively make the determination that the parcel was created in conformance with the then existing laws (there were none).

Flood: We would like to suggest that the FEMA Survey regarding high water determination which identifies the location of the flood areas should be reviewed by the county to verify it's accuracy. This mapping project should be coordinated by the county and a final product of corrected maps be developed as needed.

Alternative D- Humboldt County General Plan Volume I Framework Plan:

It is noted that a couple of the most substantial implementation measures found within Chapter 5-Implementation of the Framework Plan (adopted December 1984) were programs to: amend the zoning and subdivision ordinances of the County to make consistent with and implement the Framework Plan Policies (especially as they relate to the lands outside of the Community Planning Areas); the application of the new ordinances (including zone map changes) to the rural areas of the County; and the completion of the update of the balance of the Community Plans.

To date, the three implementation measures have not been accomplished. It is not known/knowable as to what would have happened to the rural lands over the hiatus of 23 years.

There is a need to compare the alternatives that are being proposed to the adopted Plan and its goals, policies, and standards. In this way the present language may be viewed in the context of the proposed changes. The format is use during the current process does not readily lend itself to this comparison (in fact it is very confusing or unnecessary difficult to review).

In closing, the Farm Bureau would like to request that the County cross reference the chapters to clarify the effects each proposed option would incur. Furthermore, we suggest the county continue to develop a complete General Plan Draft to enable us to review the document in its entirety. This way we can determine how specific rules in one section will effect the other sections. And finally, we would like to request a complete list of definitions to allow us to understand the intent of the document.

Thank you for allowing the Farm Bureau to provide comments and we look forward to working with you on this project in the future.

Sincerely,

Jim Regli
President