



August 16, 2007

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

RE: General Plan Update—Chapter 5.3 Forest Resources

Dear Chairman Herman and Commission Members:

Green Diamond Resource Company and several other timberland owners have reviewed the preliminary hearing draft of the Forest Resources chapter. You will be getting a copy of our group's suggested edits and comments from Mr. Bill Blackwell of Sierra Pacific Industries.

I would like to take this opportunity to draw your attention to one of my concerns with the Forest Resources chapter and other chapters of the General Plan Update: It is difficult to find the underlying data that support key statements. Here's an example. At the bottom of page 5.3-1 of the Forest Resources chapter there is a sentence that says "*New trends show historic patterns of ranching and timber production transitioning to residential uses on smaller parcels.*" As my area of expertise is timber production, and not ranching, my focus is on such trends as they relate to timber harvesting.

I tried to find supporting data for this statement in the Forest Resources and Policies Discussion Paper. I was not successful. What I did find presents a different picture:

- Figure 7 on page 1-11 shows an increasing trend in the number of acres submitted to CALFIRE for Non-industrial Timber Management Plans (NTMPs) for the years 1992 to 2002. One would expect a decreasing trend if timber production was being compromised by residential uses.
- Figure 9 on page 1-13 shows an increasing trend in the number of acres submitted to CALFIRE for Timber Harvesting Plans (THPs) for the years 1982 to 2004. Again, one would expect a decreasing trend if timber production was being compromised by residential uses.
- On page 1-19 of the paper the authors say "direct land use conversions by rezone out of TPZ have been more limited (in Humboldt County), on the order of 1,000 acres over the last 25 years." That's an average of 40 acres per year in a county that has almost 1,000,000 acres in TPZ. Conversion at these rates will not impact timber production in Humboldt County.

I also inspected the Natural Resources and Hazards Discussion Paper. On page 3-1 there is a summary of applications for Lot Line Adjustments and Certificates of Compliance for timberlands and agricultural properties since 1985.¹ After discussing

¹ I reject the concept that obtaining a Lot Line Adjustment or a Certificate of Compliance results in a conversion of timberland. This could only happen if a zoning change occurred simultaneously.

Letter to: Mr. Thomas Herman
August 16, 2007
Page 2 of 2

these applications the authors conclude *"These changes are primarily reflective of the breakup of old family ranches. Timber production on these areas is likely still viable; therefore, these changes are not deeply significant with respect to the timber economy."*

Finally I read the Discussion and Staff Recommendation section of the Forest Resources chapter that begins on page 5.3-15. I did not see any new information in that section that convinced me that the County has data that supports the notion that timber production is transitioning to residential uses on smaller parcels.

In summary I am not convinced that timber production is transitioning to residential uses on smaller TPZ parcels in Humboldt County. What would it take to convince me? I'd like to see a map. Perhaps the County could use its GIS to produce a map that shows the TPZ parcels where timber production has transitioned to residential uses.

This lack of data problem has also been apparent at the Forestry Review Committee (FRC). They recently were asked by Planning Staff to make a technical recommendation regarding "compatible density in TPZ areas." The FRC discussed this matter during three meetings (June 13, June 27, and August 8), but quickly bogged down as committee members expressed their opinions. The FRC has yet to make a motion on this issue, and could benefit from Planning Staff generated data on historic trends on conversion and subdivision of TPZ lands. The FRC may also benefit from the map I mentioned above.

I respectfully request that the Planning Commission carefully scrutinize the Forest Resources chapter and consider the timberland owner's suggested edits and comments. I'm hopeful that Planning Staff can provide you with additional data and analysis if you need such information to make informed decisions. The consequences of the various alternatives before you are huge—under Plan Alternative B, the Staff's preferred alternative, much of the TPZ land in Humboldt County will be significantly devalued without producing any timber production benefits. I also request that input on the Forest Resources chapter be kept open until the FRC has completed their review and provided their comments to the Planning Commission.

Thank you for this opportunity to share my concerns with the Planning Commission. 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.

Sincerely,



Daniel Opalach, PhD, RPF
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