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October 3, 2013

Chairperson Ryan Sundberg
Humboldt County Board of Supervisors
825 Fifth Street, Room 111
Eureka, CA 95501

RE: General Plan Update Chapter 4, Land Use (Forest Resources and TPZ Land Use Classifications)

Dear Mr. Sundberg:

On August 26, 2013 the Humboldt County Board of Supervisors took a straw vote regarding the General Plan Land Use Classifications Section 4.8, Timber Production Zoning (TPZ) that strikes the current policy of allowing for construction of a Residence Incidental to Principal Use and replaces it with allowance of a Single Family Residence and Second Residential Unit.

The City of Arcata respectfully requests that the Board reconsider this policy and retain the existing restrictions that allow residential uses that are incidental to the principal use.

Both the City of Arcata and the County of Humboldt have a long history of effectively maintaining and protecting the timberland base in our region, therefore any proposed policy changes that could lessen TPZ protections are of concern to the City.

The Arcata General Plan Policy GM-1e states:

GM-1e Resource Protection in the Planning Area. Proposals which could affect the Planning Area's resources, including those resources addressed in the Resources Conservation and Management Element shall be reviewed by the City. City review shall address the proposal's compatibility with applicable General Plan policy. The City shall communicate the intent of this policy to agencies with jurisdiction within the Planning Area (for example, the California Department of Forestry and Fire Protection for timber management, and the Humboldt Bay Harbor, Recreation and Conservation District for Humboldt Bay tidelands management) together with the policies in the Resource Conservation and Management Element.

Currently there are 7,734 acres of Timber Production Zone (TPZ) designated lands outside of the Arcata city limits but within Arcata's Planning Area including 891 acres that are owned and managed by the City of Arcata. In addition the City owns an additional 1,290 acres (in city limits) of managed timberland that is located adjacent to private TPZ lands within the Planning Area.

Given the extent of TPZ within Arcata's Planning Area and City ownership of TPZ land within the Planning Area, County General Plan update policy changes regarding TPZ should address impacts to the City of Arcata as well as consultation with City staff.

The City of Arcata supports larger sized TPZ parcels and maintains the current constraints to residential development as contained in the County of Humboldt General Plan.

In general the more residential structures and associated development (power lines, waterlines, roads etc) within the Timber Production Zone areas provide obstacles to timber management and increased opportunities for conflicts. Additionally the more residential development in the TPZ areas elevates the potential for cumulative environmental effects for managers of timberland who must conduct a CEQA equivalent analysis of timber harvesting against a backdrop of other environmental impacts within a particular watershed analysis unit.

For timberland owners engaged in timber production and long term investment for natural resources, residential development in and around timberland burdens timberland landowners with additional costs management costs. Examples of this include:

- Special treatment or removal of slash is requires within 200 feet of residential structures per State Forest Practice Rules.
- Impacts to the productivity of adjoining timberlands due to increasing conflicts over timber operations with new residents. Operational constraints on log hauling such as dust abatement, limits on hours of operation etc.
- Increased environmental analysis and consideration of cumulative watershed and habitat impacts associated with parcelization, fragmentation and human disturbance.
- Increased difficulty in managing wild land fuels due to residential development.

Long-term commercial timber production can best be realized on parcels 160 acres and larger in size. Parcels of this size devoted to growing trees should be considered as capable of being economically and practically managed for such production. Owners of land between 40 and 160 acres in size can realize long-term timber production, but the priority use of timber management likely diminishes on parcels less than 80 acres once residential development occurs.

Harvesting timber from smaller parcels is more expensive. For example, the costs of moving logging equipment are the same for a large sale or a small sale. The cost per unit volume of timber rises when there are fewer units, which translates to lower stumpage to forest owners.

Consistent with the state law, the City of Arcata Forest Management Committee (FMC) recently made the following recommendation to the Arcata City Council by motion (5-0 in the affirmative):

- *Reaffirm need for TPZ zoning and our concern about lessening TPZ Development restrictions (particularly parcels adjacent to the Arcata/Jacoby Creek Forests) as that has as well as impacting the manageability of adjacent timberlands.*
- *Timber production should be primary us of TPZ lands and residential use only as necessary for timber management as stated in current TPZ law.*
- *Concern about maintaining integrity of the City of Arcata's working forestlands and public trust resources if fragmentation of adjacent 160 acre or larger TPZ parcels occurs.*

- List "A" TPZ should be 640 acres and list B TPZ should be 160 acres
- Humboldt County Board of Supervisors recent straw vote regarding TPZ that strikes the current policy of allowing a **Residence Incidental to Principal Use** and replaces it with allowance **Single Family Residence and Second Residential Unit** encourages the fragmentation of TPZ land, will result in lands being taken out of production as well as impacting the manageability of adjacent timberlands.

The City Council concurs with the recommendation by the Arcata Forest Management Committee. The Arcata Open Space and Agriculture Committee and Wetlands and Creeks Committee have also endorsed the action of the Forest Management Committee.

Within the City of Arcata Planning area, residential use of TPZ zoned parcels should require conditional use permits that allow for discretionary review and environmental analysis of the impacts of road construction, storm water runoff related to impermeable surfaces, encroachment into riparian and wetland buffer zones and other impacts from the residential use of lands zoned for Timber Production. We are also concerned about growth inducing traffic patterns on certain county roads that lead into the Arcata City limits, most notably Fickle Hill Road and Old Arcata Road. We have additional concerns regarding the need for additional utility services on TPZ land that the City provides water services to (Jacoby Creek County Water District) and sewer services (Fieldbrook/Glendale Community Services District). If the County General Plan amended policies result in allowance for increased residential development on TPZ lands that exceed the Draft EIR that was prepared for the County Planning Commission General Plan review, then the City would expect that the EIR be revised to address potential impacts to the City of Arcata and within Arcata's Planning Area.

Through its support of conservation easements on working lands that remove the potential for subdivision and limits residential development (fragmentation), the County has acknowledged positive aspects of keeping large resource land parcels intact and uncluttered from residential development. In general, the City of Arcata supports at a minimum the current General Plan policies regarding residential development within TPZ which strikes balance with maintaining the integrity of the resource lands while allowing for residential use incidental to the principal use. Thank you for consideration of our comments which we believe to be consistent with a recent (September 23, 2013) Board straw vote regarding the general plan update "guiding principles" whereby the Board voted to revise principal # 4 as follows: "Cooperate with service providers and promote efficient use of roads, water and sewer services by encouraging development in areas with existing infrastructure and discouraging conversion of resource lands and open space to other uses".

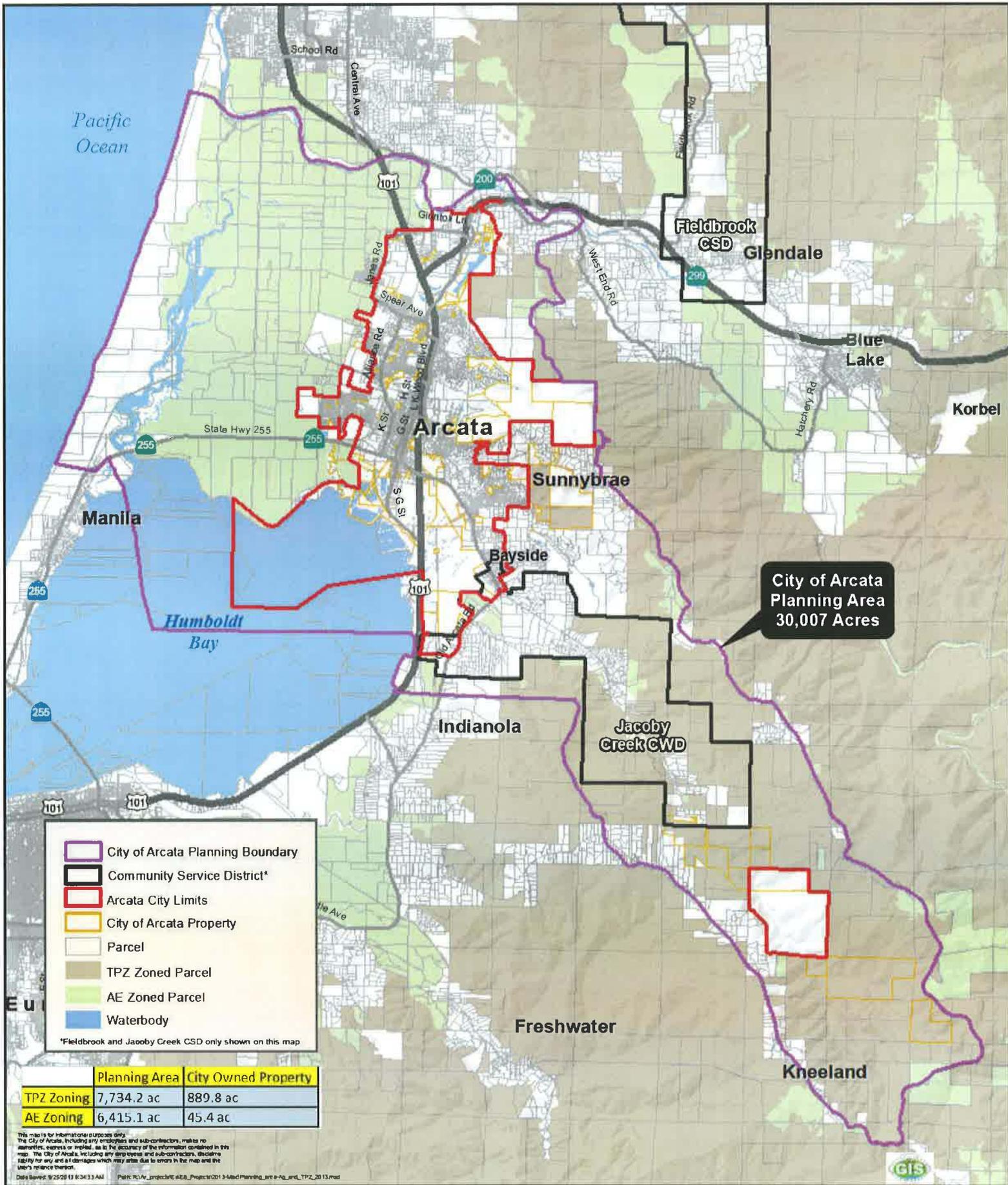
Sincerely,



Shane Brinton
Mayor, City of Arcata

Cc: George Gentry, Executive Officer, California Board of Forestry and Fire Protection
Linda Disiere, Chair, Planning Commission, County of Humboldt
Kevin R. Hamblin, Director, Planning & Building, County of Humboldt

Attachments: Map of TPZ and AE Zoning with the City of Arcata Planning Area



City of Arcata
Environmental Services

AE and TPZ Zoned Parcels within City of Arcata's Planning Boundary



Notes:
Humboldt County Parcels - August 2013
Zoning - August 2013
Community Service Districts - csds7sp.shp