

April 21, 2011

Humboldt County Planning Commission
Community Development Services
3015 H Street
Eureka, CA 95501

Comments on the Mineral Resources Section, Conservation & Open Space Element

Dear Commissioners,

When addressing Humboldt County's finite supply of mineral resources the focus should be on environmental protection and satisfying long-term LOCAL demand. All mining-related land management practices should work towards the ultimate goal of recovery of threatened and endangered species, not just to "avoid take." Operating under the status quo will not bring back the Salmon to our rivers nor will it repair our currently degraded watersheds. Although we support the majority of A/B policies in this section there are several policies which we feel should be afforded particular attention:

We support **MR-P7**, Reclamation, as written. All mined lands should be restored to a usable condition pursuant to the General Plan and zoning designation. We do not support narrowing this policy to "commercial" operations.

We support **MR-P10**, Maintenance of Mineral Haul Routes, as written. Given the current backlog of road maintenance costs in the County, and the increased wear and tear on roadways due to mining operation-related truck traffic, commercial mining operations should account for their "proportional share" of road maintenance costs. We do not think the County should wholly bare this burden.

As written, **MR-P11**, Permit Conditions to Reduce Impacts, calls for the minimization of significant environmental impacts. Pursuant to CEQA, minimization of significant impacts relating to a project is not enough. CEQA requires that impacts be reduced to less than significant. As such, we suggest the following language:

MR-P11. Permit Conditions to Reduce Impacts. Permit conditions for mineral extraction operations shall address allowable dust and noise levels, hours of operation, fencing, traffic, access, setbacks, and other performance standards necessary to ~~minimize~~ reduce significant environmental impacts to less than significant and reduce conflicts with adjacent land uses development.

Regarding **MR-P12**, we feel that staff's preferred "Alternative B" is insufficient for protection of the County's irreplaceable agricultural lands. For this reason, we support "Alternative A." We could accept a modified "B" version that would protect prime agricultural lands altogether while

allowing mining on non-prime Agricultural lands so long as disturbed areas are restored to pre-mining agricultural productivity. It must be noted, however, that restoration to pre-mining conditions is not possible if mining lowers the surface elevation to a point where it intersects groundwater or otherwise effects natural drainage.

MR-P12. Off-Channel Terrace Mining. Off-channel commercial terrace mining of sand and gravel deposits on prime agricultural land is prohibited. Off-channel commercial terrace mining of sand and gravel deposits on all other lands planned for agriculture shall be conditioned to restore pre-mining agricultural productivity through prompt reclamation of disturbed areas.

We thank you for this opportunity to provide these comments.

Sincerely,

Dan Ehresman, Policy Analyst