

September 8, 2009

Humboldt County Planning Commission
Attn: Martha Spencer
3015 H Street
Eureka, CA 95501

Re: General Plan Update Policies Limiting Package Sewage Treatment Plants and Protecting the County's Rural Landscape

Dear Chairman Smith and Members of the Planning Commission,

Thank you for the opportunity to comment on the proposed Land Use Element of the County's General Plan Update. Healthy Humboldt is a coalition of public interest organizations working for a County General Plan Update that provides healthy transportation and housing choices while protecting resource lands and watersheds by focusing future growth in existing communities.

Some members of the development community are advocating for policies that would allow the use of private infrastructure to facilitate development, such as package sewage treatment plants. Review of the Sonoma County General Plan Update sheds light on the impacts of the use of such plants, both on orderly development and on the environment, particularly water resources. As you contemplate the Land Use Element, particularly the Rural Lands and Growth Planning chapters, we hope the following will be informative.

The failure to appropriately limit the use of package sewage treatment systems would likely lead to significant negative impacts, both individual and cumulative, on the following resources:

- Water resources: Depending on where the effluent is discharged, such systems could add pollutants to already-impaired waterbodies, and could further impair waterbodies through increased water withdrawals related to increased development. Pollutants commonly detected in treated sewage include bacteria, nutrients, heavy metals, pharmaceuticals, endocrine disruptors, and others known to be harmful to aquatic organisms.
- Biological resources: Impacts to water resources are likely to impact riparian and aquatic resources, both in the waterbody immediately affected as well as in downstream waterbodies. Increased use and construction of unpaved roads would be likely to increase erosion and sedimentation to streams, further degraded habitat of listed salmonids.
- Air resources: "Leapfrog" and poorly planned development that would likely occur would negatively impact air resources through increased greenhouse gas emissions, and which would also threaten the County's ability to meet greenhouse gas emissions reductions targets required under AB 32. In addition, impacts in particulate matter related to increased construction and use of unpaved roads would further degrade air quality.

The County should not approve development based on the capacity to treat wastewater with a new "package treatment plant" technology. The location of new development should be based

solely on the General Plan, not on whether wastewater treatment is possible. Package treatment plants should only be permitted when they are consistent with the General Plan and necessary to resolve an existing public health hazard.

Much of Humboldt County's rural landscape has not been open to development because of a lack of sewage treatment capacity; in these areas, physical constraints like soil, hydrology, and slope made traditional septic systems impossible. Today, however, this barrier to development is increasingly being overcome through the installation of "package treatment plants." These plants are a significant departure from traditional septic tanks that operate on a small scale, generally serving a single household.

Package treatment plants are privately owned facilities that, like a conventional sewage treatment facility, can serve users on a much larger scale, on many parcels of land. Allowing package treatment systems could open up thousands of parcels to development throughout unincorporated Humboldt County.

In addition to obvious concerns about opening up vast tracts of rural lands to development, Healthy Humboldt is concerned about where water would go after treatment, whether wastewater could contaminate surface water and groundwater, and how these large-scale privately owned facilities would be monitored.

The location of new development should not be decided by whether wastewater treatment is possible. Development approvals should be based on where local citizens and their elected officials have decided new growth should go, as laid out in the General Plan.

Healthy Humboldt Coalition's policy recommendation:

Ensure that package treatment plants are only permitted when they are consistent with the General Plan and necessary to resolve an existing public health hazard. Specify that new treatment plants shall not encourage new development and their use must not be in conflict with other General Plan goals and policies.

The lack of reasonable limits on the use of package sewage treatment plants would have growth-inducing impacts that are required to be assessed and mitigated under 14 CCR §15126.2(d), along with the potential for negative impacts to water quality, air resources, and biological resources, particularly aquatic organisms, many of which are listed as Threatened and Endangered under state and federal law.

We hope that these comments are helpful in your deliberation of the Land Use Element, and look forward to providing additional input as the General Plan Update process moves toward completion.

Sincerely,



Jennifer Kalt
Healthy Humboldt Coalition