

March 12, 2007

Michael Wheeler, Senior Planner
County of Humboldt
3015 H Street
Eureka, CA 95501



RE: Comments on Chapter 16, Mineral Resources, of the General Plan Update

Dear Mr. Wheeler:

Granite Construction Company ("Granite") respectfully submits the following comments relating to the Preliminary Hearing Draft for Chapter 16, Mineral Resources, of the Humboldt County General Plan Update.

Introduction

Granite Construction Company is one of the nation's largest heavy civil contractors and construction materials producers. As an industry leader, Granite is committed to providing materials and construction services while taking a leading role in protecting the environment and our natural resources. Locally, Granite operates numerous in-stream gravel extraction and processing sites, and is a proud member of the Humboldt County business community.

Our construction materials products, including sand, gravel, and asphalt concrete are essential building blocks for local roads, buildings, and infrastructure. As such, aggregates are both a major contributor to, and key indicator of, the economic health of the region. Consistent with California state averages, each Humboldt County resident uses approximately 7 tons of construction aggregates annually. Considering the regional demand and vital importance of a local source of aggregates, the General Plan notes that it is "important to protect specific sites and haul routes against land use incompatibilities to assure the continued utilization of this resource." Towards this end, Granite has prepared the following comments on the Draft General Plan Update, and looks forward to working cooperatively with the County throughout the development and implementation of this project.

General Comments

Granite recognizes and appreciates the significant effort that Humboldt County Planning staff has committed to this General Plan Update, and strongly believes that it is in all parties best interest to develop a Mineral Resources component of the General Plan that is capable of fulfilling its stated purpose of "identify(ing) the County's known mineral resources and support(ing) the conservation, development and utilization of these resources." The comments contained herein are based upon the understanding

that the County staff recommendation for the preferred alternative is *Plan B*, which consists of the following goals, policies, standards and implementation measures:

Goals & Policies

- ✓ MR-G1 - Long Term Supply of Mineral Resources
- ✓ MR-P1 - Mapping Mineral Deposits
- ✓ MR-P2 - Future Development Planning
- ✓ MR-P3 - Reclamation for Alternative Uses
- ✓ MR-P4 - Production and Conservation
- ✓ MR-P6 - Community Character
- ✓ MR-P7 - Mineral Haul Routes
- ✓ MR-P8 - Conflict Reduction
- ✓ MR-P9 - Sand and Gravel Extraction and Mean Annual Recruitment
- ✓ MR-P11 - Water Diversion Projects
- ✓ MR-P15 - Right to Mine

Standards

- ✓ MR-S1 - Surface Mining Standards
- ✓ MR-S2 - Timberland Conversion
- ✓ MR-S3 - Mineral Resource Combining Zone
- ✓ MR-S4 - Permitted Land Use Designations
- ✓ MR-S6 - Borrow Pits
- ✓ MR-S7 - Subdivision

Implementation Measures

- ✓ MR-IM1 - Permit and Ordinance
- ✓ MR-IM2 - Mapping
- ✓ MR-IM3 - Hearing Notification
- ✓ MR-IM4 - Development Consultant
- ✓ MR-IM5 - Combining Zone

In general, Granite supports the preferred alternative recommended by staff and has provided specific comments below that would serve to clarify and/or strengthen the indicated sections of the document. Granite strongly opposes the adoption of any of the additional elements of alternative plan A, as many lack suitable justification, are unenforceable, costly, undefined, and are counter to the stated purpose of the Mineral Resources chapter. For these reasons, Granite is encouraged that County staff has not recommended adoption of MR-P16 through MR-P21, MR-S5, or MR-IM6.

Specific Comments

- ❖ Page 16-6, MR-IM4, Development Consultant "The County should hire a consulting firm qualified in surface mining and reclamation practices to advise the County when large surface mineral deposits are proposed for development...": The hiring of a consulting firm to assist with processing surface mining applications may not be appropriate in all situations, and should be evaluated

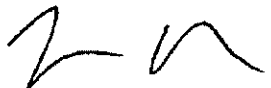
on a case-by-case basis. Further, a definition of "large surface mineral deposits" is necessary to ensure clarity and consistency.

- ❖ Page 16-12, Terrace Mining - "...in-stream gravel mining (versus terrace mining) is preferred as it does not have the conflicts with agricultural land uses that would result from terrace mining.": It is highly simplistic to conclude that in all cases in-stream mining would be preferred in comparison to terrace mining. A case-by-case evaluation should be conducted to determine the viability of future proposals that may include terrace mining. Terrace mining, if properly planned and implemented could be a suitable, and perhaps, beneficial option for future mining within Humboldt County, and should not be prematurely dismissed.
- ❖ Pages 16-12 & 13, Staff Recommendation - "Staff recommends continuation of these existing policies, standards and implementation measures (Policies P1 through P13, Standards S1 and S5, and Implementation Measures IM1 through IM5).": Based upon conversations with County staff, it is our understanding that this section contains typographical errors, and that instead, the preferred alternative recommended by staff includes Policies P1 through P4, P6 through P9, P11, and P15, Standards S1 through S4, S6, and S7, and Implementation Measures IM1 through IM5. This section should be revised to accurately reflect the policies, standards, and implementation measures being recommended by staff.
- ❖ Page 16-24, Conclusion - "Adding MR-P16 through P21, MR-S5, and MR-IM6 would add additional measures and restrictions related to conservation of mineral resources.": Similar to our comments outlined above, it is our understanding that these additional measures and restrictions are not recommended by staff. For reasons previously described, Granite strongly opposes consideration of these additional elements, and supports staff's decision not to recommend implementation.

Thank you for your time and consideration on this matter. Please do not hesitate to contact me at (707) 467-4124 if you would like to discuss any element of the comments outlined above.

Sincerely,

GRANITE CONSTRUCTION COMPANY



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