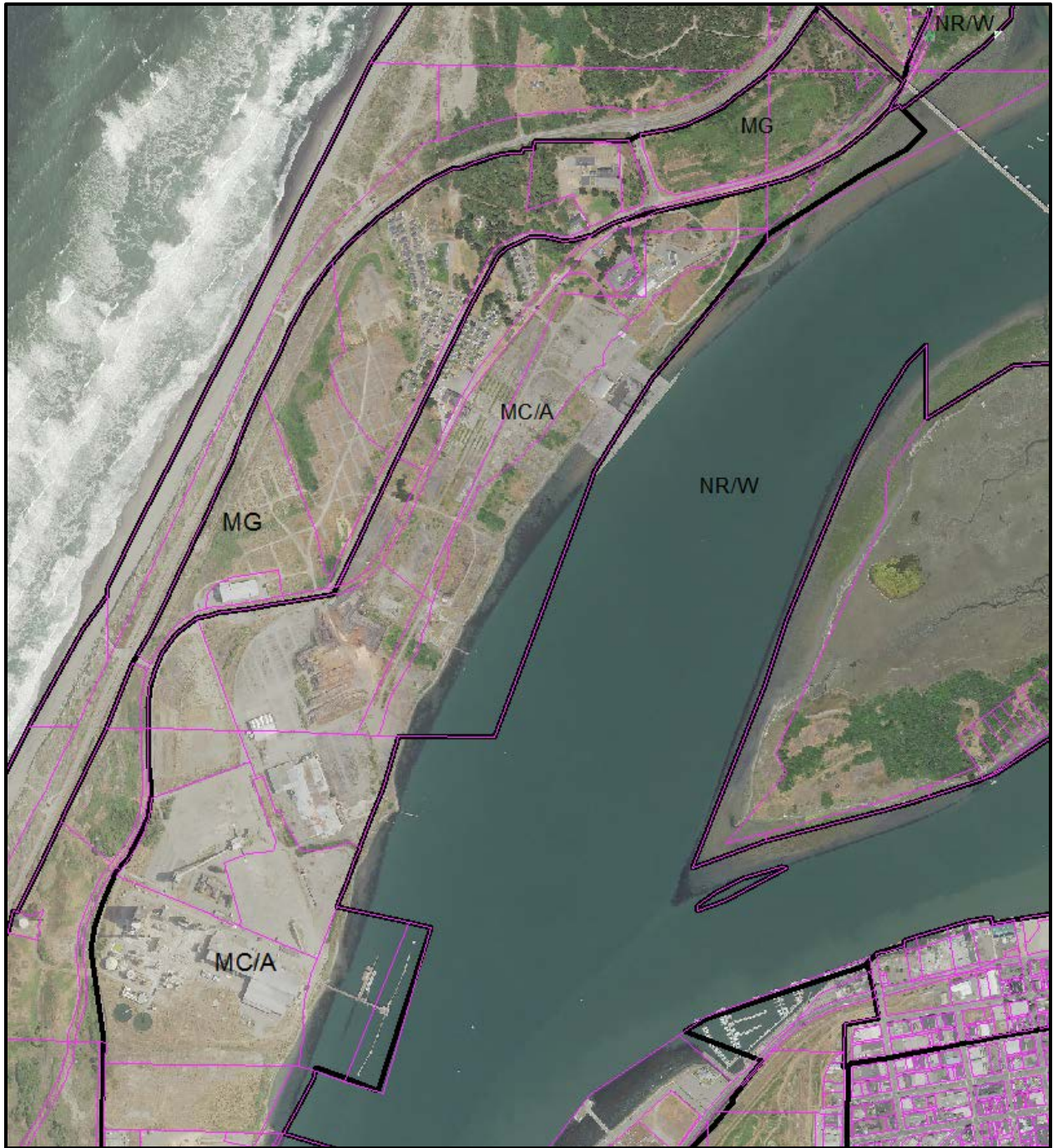


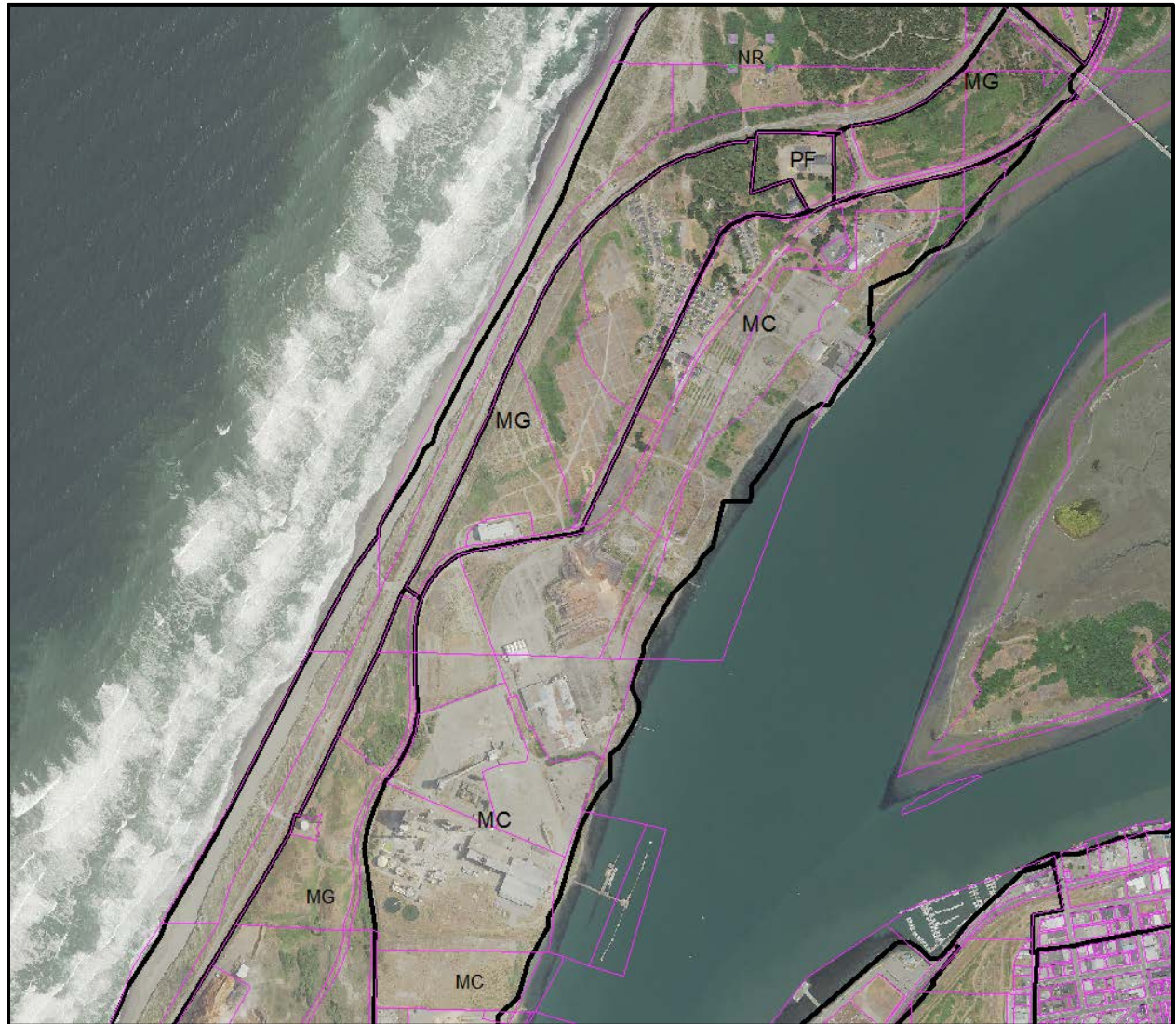
Overview of Parcels Zoned MC on the Samoa Peninsula



North Samoa Peninsula Zoning Designations



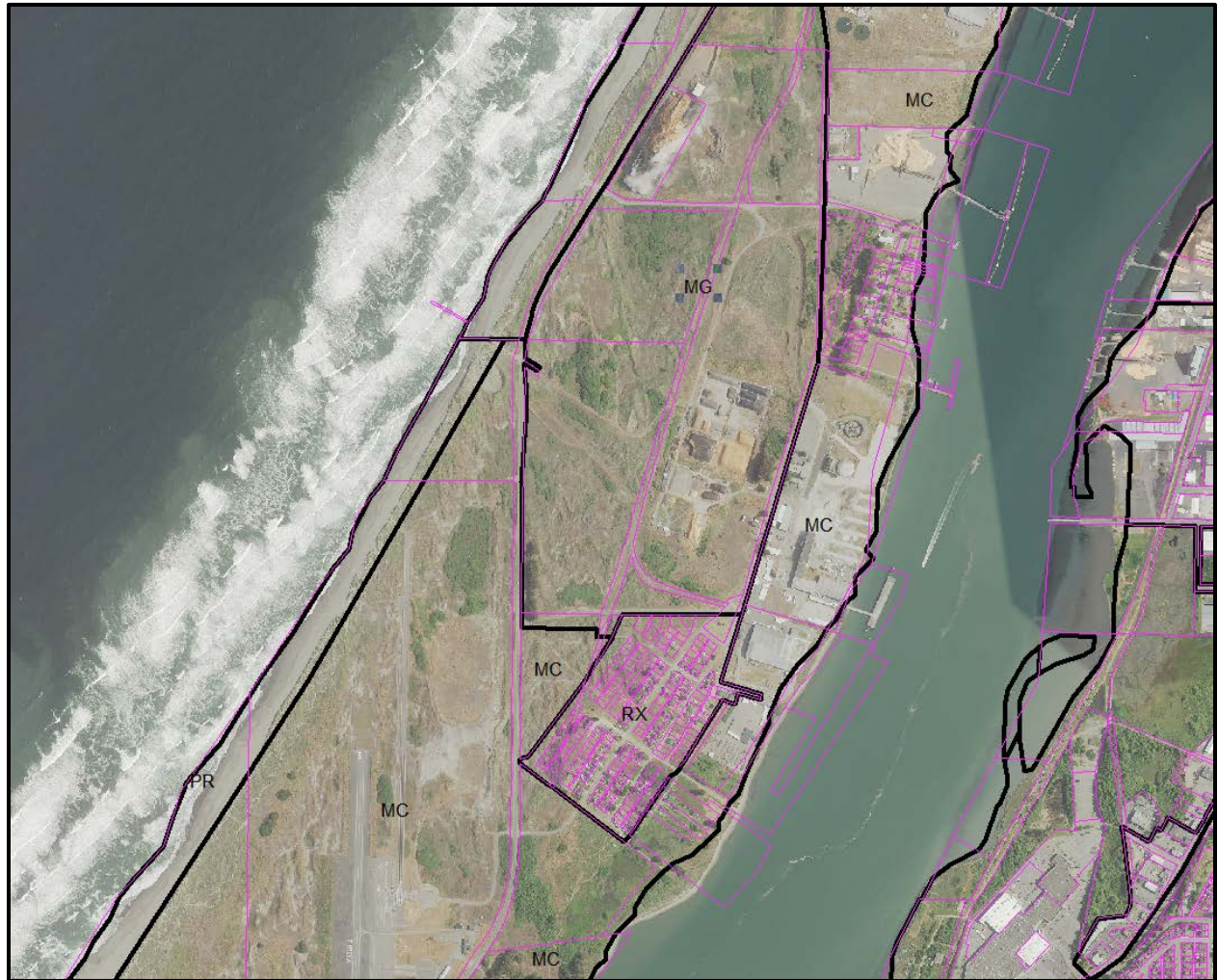
North Samoa Peninsula Land Use Designations



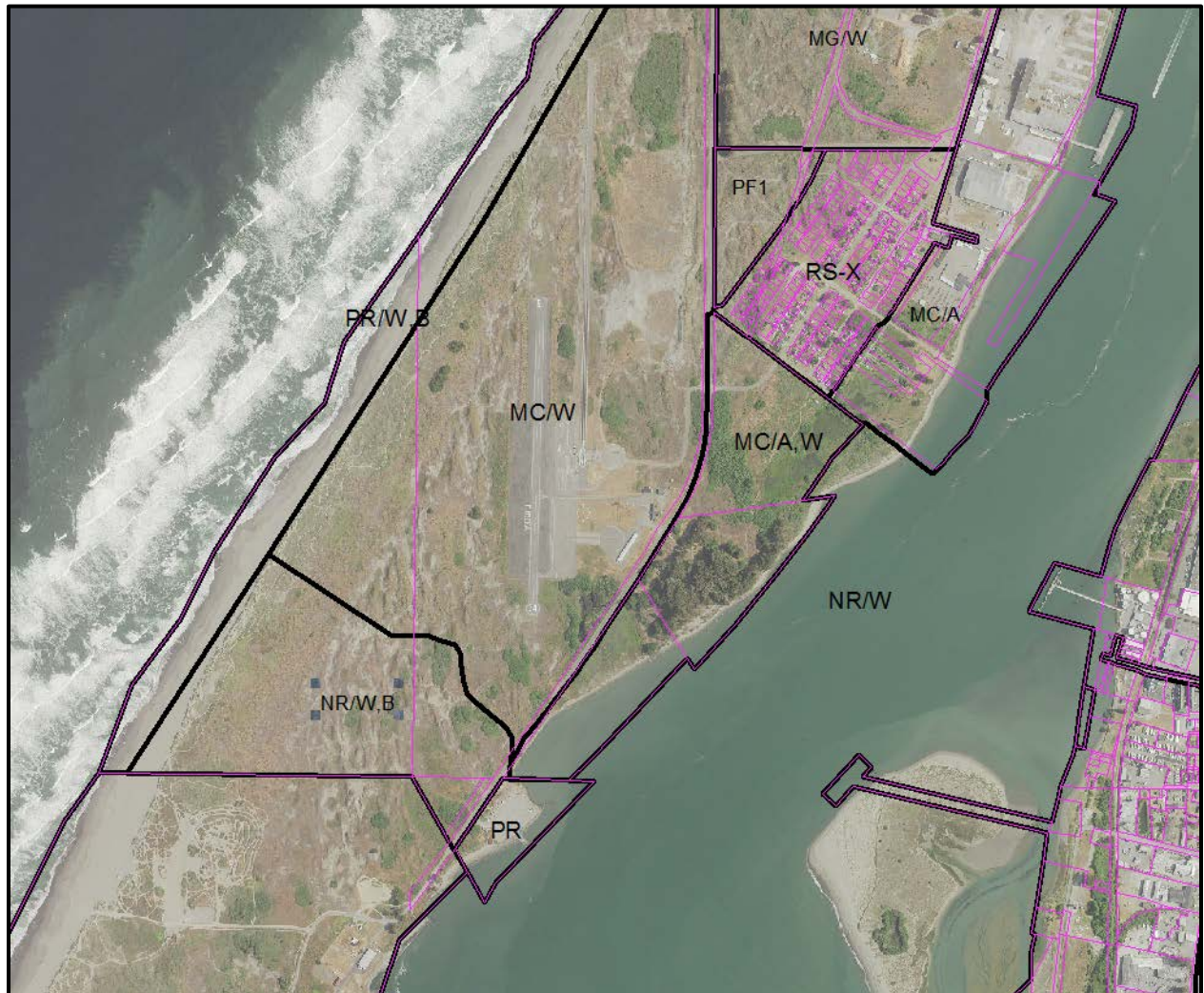
Mid-Samoa Peninsula Zoning Designations



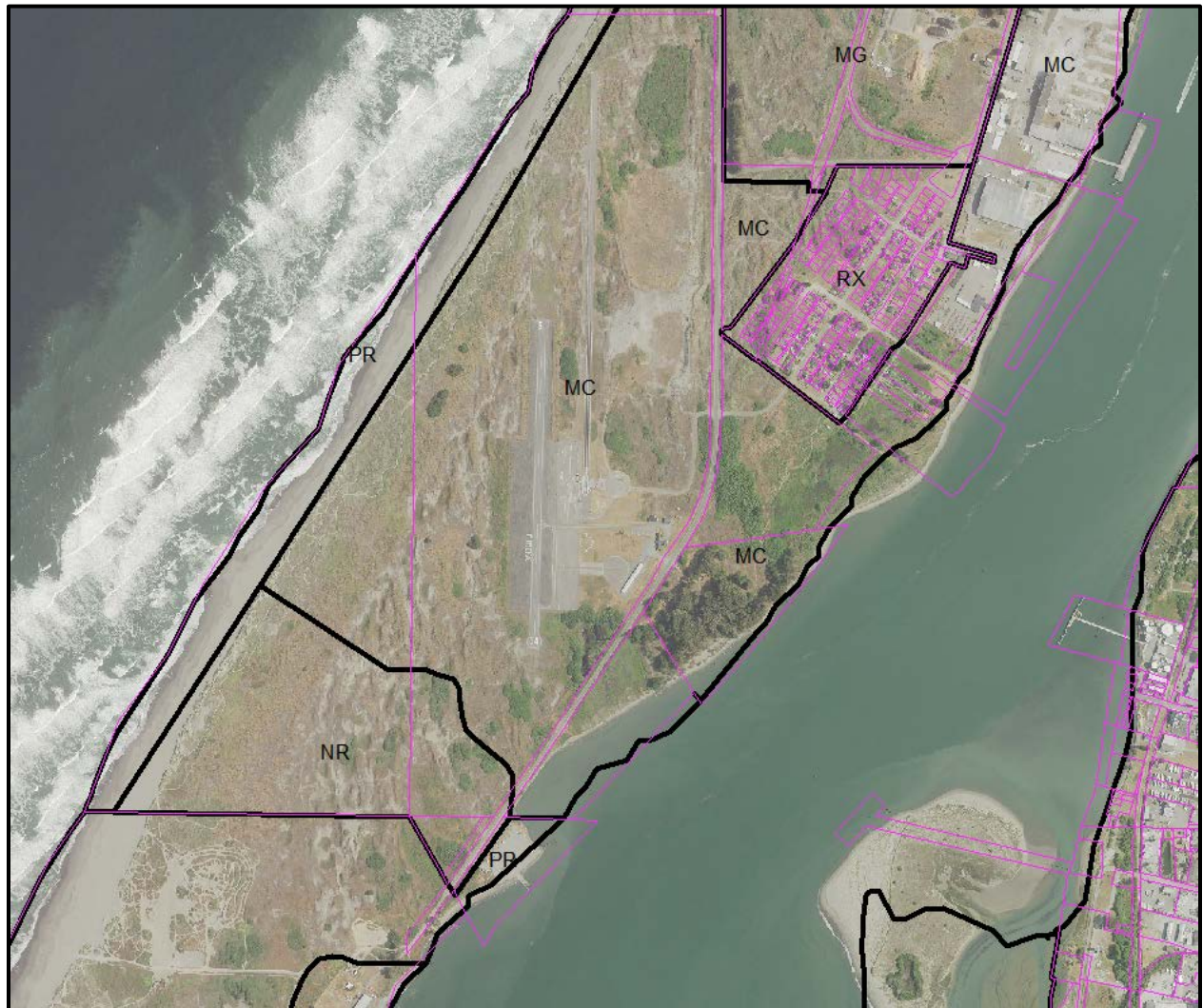
Mid-Samoa Peninsula Land Use Designations



South Samoa Peninsula Zoning Designations



South Samoa Peninsula Land Use Designations



Overview of Parcels Zoned MC in King Salmon and Fields Landing



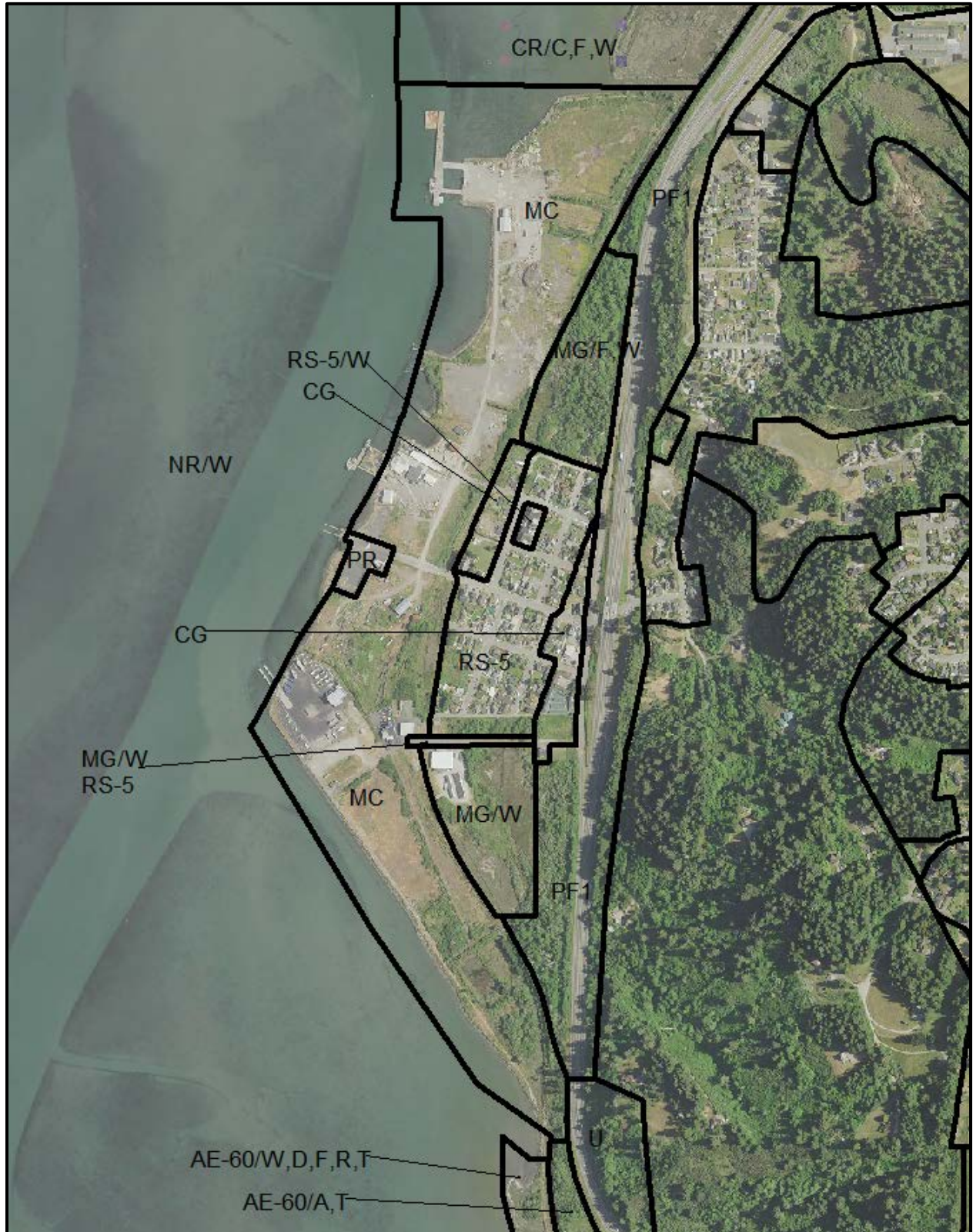
King Salmon Zoning Designations



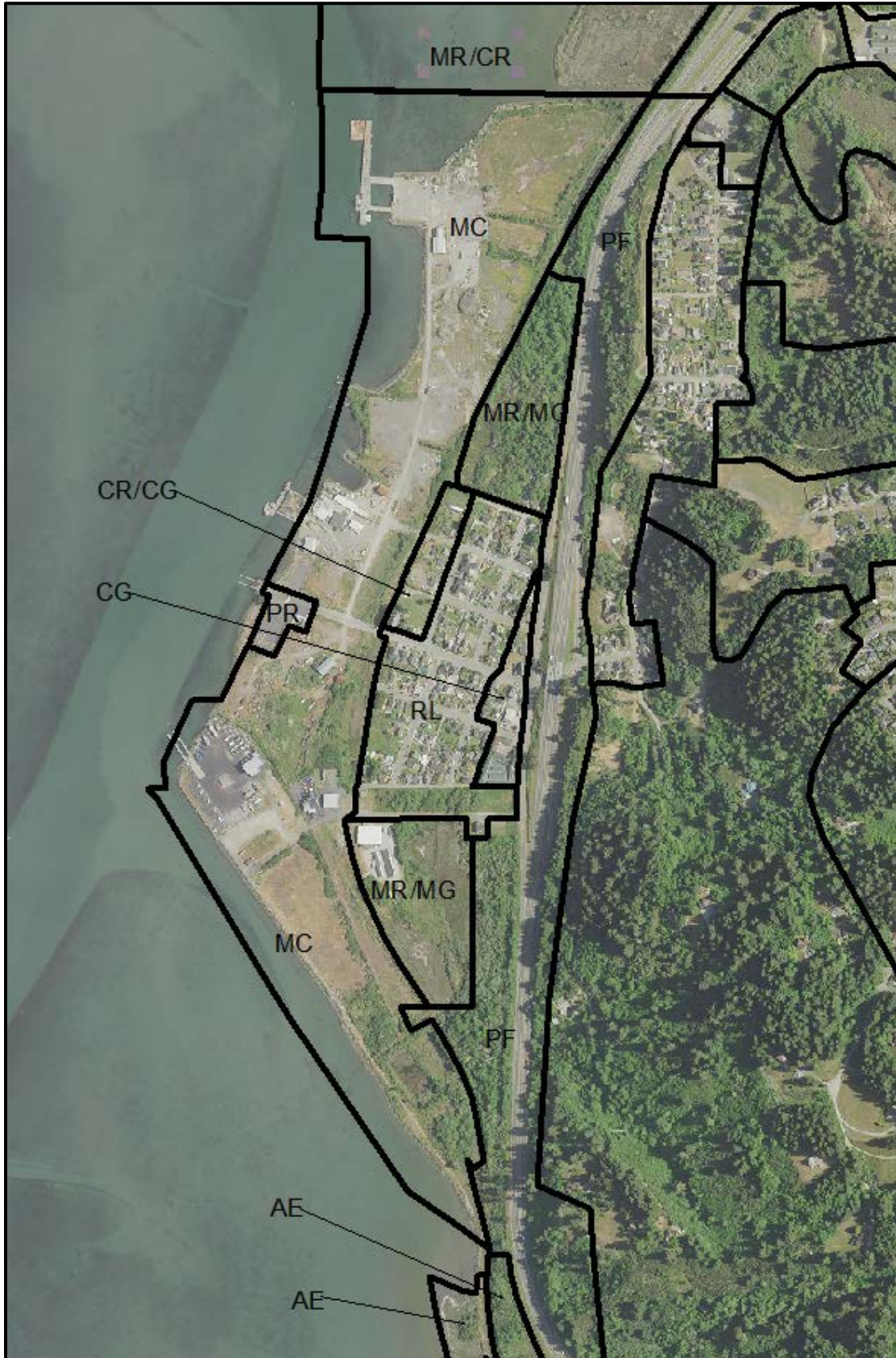
King Salmon Land Use Designations



Fields Landing Zoning Designations



Fields Landing Land Use Designations



ATTACHMENT 1

Staff Analysis of the Evidence Supporting the Required Findings

Setting: The proposed Interim Use LCP Amendment would pertain to all property in Humboldt County with a zoning designation of MC. Property with this zoning designation is located within the Humboldt Bay Area Plan (HBAP) area around Humboldt Bay in three locations: on the Samoa Peninsula, and in King Salmon and Fields Landing. According to a GIS analysis, there are approximately 1,178 acres zoned MC in the HBAP area, with approximately 118 assessor's parcels containing some portion zoned MC.

Samoa Peninsula

Land zoned MC along the Samoa Peninsula begins just north of Samoa County Park and extends approximately 4 miles north along the Humboldt Bay shoreline to the State Route 255 Bridge. The location of the MC zoned lands along the peninsula is shown on attached aerial photos that show the zoning and land use in the north, middle and southern portion of the peninsula.

There is an estimated 971 acres zoned MC on the Samoa Peninsula, of which approximately 26 acres appear to be roadways, with the remaining 945 acres contained within 89 assessor's parcels. Approximately 145 acres of the MC zoned area is water or mud flat based on an aerial photo GIS analysis. The portion of the Eureka Municipal Airport property located on the west side of Highway 255 consists of approximately 266 acres, with all but the developed portions having a coastal resource protection designation of dune or dune hollow habitat, much of which is managed by BLM. Another 90 acres of MC zoned land located across from the airport is owned by the City of Eureka (part of the large airport parcel) and a private landowner, and exists in a natural state with approximately 25 acres having a coastal resource protection designation. Just north of that area, there are approximately 14 acres of MC that contain residences or are generally undeveloped. Some of the non-CDI uses presently in the MC zone district include improved or vacant residential lots, railroad rights of way, the Samoa Cookhouse, Fox Farm Soils and Fertilizer Company (located in Fairhaven), and the Eureka Municipal Airport.

There are approximately 25 Assessor's parcels totaling 390 acres of MC zoned land and water with some level of current CDI use, or evidence of past CDI use such as CDI infrastructure (the condition of which was not determined). These are gross acres, meaning that the discrete areas of CDI use were not calculated; however, it appears that the majority of the 390 acres was likely utilized. At present, there are approximately 50 acres of land and water being utilized for CDI uses. These acres include all of the California Redwood Company parcels where wood chip import/export activities are occurring (approximately 43 acres), a small boat repair business (approximately 2 acres), hag fish related activities on the dock and in a warehouse on the Harbor District's Redwood Dock 1 property (approximately 2 acres), and mariculture activities on the dock and in a warehouse on the Harbor District's Redwood Dock 2 property (approximately 2 acres). The acreages for the activities on the Harbor District's property are discrete acreages as opposed to gross acreages for the entire parcel upon which the activities are located because the parcels are significantly larger than the areas being utilized for CDI purposes.

Besides MC, the other major zone district on the peninsula is MG: Industrial General. The majority of the MC, which borders the bay along the peninsula, is bordered by MG on the west and NR: Natural Resources (Humboldt Bay) on the east. The MC zone district is bordered by NR to the south of the Eureka Municipal Airport, and by PR: Public Recreation to the south of the City of Eureka's property across from the airport. There is a small area of PF1: Public Facility (Urban) adjacent to the airport owned by the Fairhaven Fire Protection District, the majority of which has a land use designation of MC. There is approximately 55 acres of RS: Residential Single Family bordered by the aforementioned PF1 property, MC and MG.

King Salmon

There are approximately 68 acres in King Salmon zoned MC, including 67-acres owned by PG&E that contains the Humboldt Bay Power Plant and Humboldt Bay Generating Station, and an acre owned by the Harbor District. The southerly portion of the PG&E parcel contains approximately 15 acres with a coastal resource protection designation of wetland and which also contains a slough channel.

Fields Landing

There is approximately 139 acres of area within 30 Assessor's parcels zoned MC in Fields Landing, approximately 35 of which are water and another approximately 15 acres have a coastal resource protection designation of wetland. Approximately 88 acres within 10 Assessor's parcels either currently support CDI use, or contain evidence of past CDI use such as CDI infrastructure (the condition of which was not determined). These 88 acres consist of Humboldt Bay Forest Products (no longer operating) and the Fields Landing Terminal, now operated as a boat yard. At present, there is approximately 10 acres of CDI use at the Fields Landing Boat Yard which is owned by the Harbor District and used for boat repair and storage.

Other zone districts adjacent to the MC district include MG, NR (Humboldt Bay), CR: Commercial Recreation, CG: Commercial General, RS, PF1 generally along Highway 10, PR: Public Recreation, with AE-60: Agricultural Exclusive and U: Unclassified at the southern tip of the MC zoning. The 25 acres of residential zoning is surrounded by MC, MG, CG and PF1 zone districts.

Key Marine Sites

According to the 2003 Port of Humboldt Bay Harbor Revitalization Plan, there are 16 key sites comprised of 80 parcels totaling 1,315 acres that include all current and potential marine industrial and commercial properties in Humboldt Bay from the Samoa Bridge to the end of the Fields Landing Channel on the mainland, and from the Samoa Bridge to the channel entrance on the Samoa Peninsula. In 2003, these 16 sites included six sites with active cargo terminals, five sites with inactive cargo terminals, and five industrial, commercial or other public sites. Two of the six active sites in 2003 are located on the Samoa Peninsula (Samoa Pacific Chip Export Dock which is now the CRC Chip Export Dock, and Simpson Property/Fairhaven Terminal which is now the Fairhaven Business Park/Fairhaven Terminal), and one is located in Fields Landing (Humboldt Bay Forest Products). One of the five inactive sites in 2003 is located in Fields Landing (Fields Landing Terminal, owned by the Harbor District), and two are located on the Samoa Peninsula (Simpson-Samoa Redwood Dock Site which is now Harbor District Redwood Dock 1, and the Samoa-Pacific Pulp Mill Dock site which is now Harbor District Redwood Dock 2.)

Key Marine Sites 2003

Sites with Active Cargo Terminals	Sites with Inactive Cargo Terminals	Other Industrial, Commercial and Public Sites
Schneider Dock Eureka Forest Products/Preston Prop. Chevron Terminal Humboldt Bay Forest Products Samoa Pacific Chip Export Dock Simpson Property/Fairhaven Terminal	Dock B/Balloon track Phillips Petroleum Fields Landing Terminal Area Simpson-Samoa (Redwood Dock) Site Samoa Pacific Pulp Mill Dock	Halvorsen/City Sites HSU Boating Center Commercial Street/C Street Docks Parcel 4 Eureka Airport Property

A June 18, 2014 technical memorandum prepared by LACO (see the *Decline of CDI Uses* section below) provides the 2014 status of these 16 sites. Although the 2014 LACO memo lists the Fairhaven Terminal as active in 2014, it is no longer active and has been moved to the Inactive Cargo Terminals list in the Key Marine Sites 2016 table below. The LACO memo also classifies the CRC Chip Export Dock (formerly Samoa Pacific) as mostly inactive in 2014, but the site is currently more active than in 2014 and has been listed as active in the table below. The active cargo terminals have been reduced from 6 to 4 since 2003. Humboldt Bay Forest Products is one of the sites that became inactive since 2003. The

LACO memo states that site included an active 600-ft. log export dock that is now considered inactive due to its poor condition and lack of recent export activity, and note the 200-ft dock on a parcel owned by the Harbor District to the south is also inactive due to condition and title issues. The Fairhaven Terminal is the other site that became inactive, but the dock remains in serviceable condition.

Key Marine Sites 2016

Sites with Active Cargo Terminals	Sites with Inactive Cargo Terminals	Other Industrial, Commercial and Public Sites
Schneider Dock Eureka Forest Products/Preston Prop. Chevron Terminal Samoa Pacific Pulp Mill Dock (CRC)	Dock B/Balloon track Phillips Petroleum Fields Landing Terminal Area Simpson-Samoa (Redwood Dock) Site Humboldt Bay Forest Products Samoa Pacific Chip Export Dock Simpson Property/Fairhaven Terminal	Halvorsen/City Sites HSU Boating Center Commercial Street/C Street Docks Parcel 4 Eureka Airport Property

Background: Planning for coastal-dependent industrial uses for the current LCP was done in the 1970's, when demand for land to accommodate these types of uses was much higher than it is today. Due to the current lack of CDI uses, there is a resulting large amount of vacant or underutilized land zoned for CDI use around Humboldt Bay. This circumstance has existed for many years, some would say decades, during which time the economic issues associated with this circumstance have been raised to the Planning Department by property owners, and discussions about how to address these issues have been ongoing with the Coastal Commission.

Humboldt Bay Harbor, Recreation, and Conservation District – Port of Humboldt

According to the Caltrans Transportation Planning website, *California has 11 public ports, which include 3 “megaports” (Los Angeles, Long Beach, and Oakland), 8 smaller niche ports (Hueneme, Humboldt Bay, Redwood City, Richmond, West Sacramento, San Diego, San Francisco, and Stockton), and 1 private port (Benicia). The Ports of Los Angeles and Long Beach comprise the largest port complex in the United States and are key players in global enterprise. Together, they handle a fourth of all container cargo traffic in the United States. The Port of Oakland, the fourth largest port in the nation, handles trade from the Pacific Rim countries, delivering 99% of the ocean containers passing through Northern California to the rest of the nation.*

Of these 12 ports, only four are governed as ports under the Coastal Act, Chapter 8 Port, Section 30700 et seq., those four being the Ports of Hueneme, Long Beach, Los Angeles, and San Diego Unified Port District. Pursuant to Chapter 8, these ports must develop a port master plan which when certified, provides them with permitting authority within their planning area.

The Humboldt Bay Harbor, Recreation, and Conservation District is addressed in Chapter 8, but not in the same manner as the four ports noted above. Coastal Act Section 30701 declares: *The ports of the State of California, including the Humboldt Bay Harbor, Recreation, and Conservation District, constitute one of the state’s primary economic and coastal resources and are an essential element of the national maritime industry. The location of the commercial port districts within the State of California, including the Humboldt Bay Harbor, Recreation, and Conservation District, are well established, and for many years such areas have been devoted to transportation and commercial, industrial, and manufacturing uses consistent with federal, state and local regulations. Coastal planning requires no change in the number or location of the established commercial port districts. Existing ports, including the Humboldt Bay Harbor, Recreation, and Conservation District, shall be encouraged to modernize and construct necessary facilities within their boundaries in order to minimize or eliminate the necessity for future dredging and filling to create new ports in new areas of the state.*

This section essentially means that Humboldt Bay is recognized as a port under Chapter 8 and is encouraged to further develop port facilities to minimize the need for new ports in new areas, but is not

developed enough as a port to be able to have a port master plan. An amendment to the Coastal Act would be required to allow the Humboldt Bay Harbor, Recreation, and Conservation District to develop a port master plan, or to remove it from Chapter 8.

This is one of several reasons Humboldt Bay is unique as compared to other ports under the jurisdiction of the Coastal Act, and other ports along the coast in general. One of the primary differences between Humboldt Bay and the other coastal ports, all of which are quite active in terms of port related activities when compared to Humboldt Bay, is easy connectivity to main inland transportation corridors, particularly the Interstate 5 corridor. Humboldt County is challenged when it comes to efficient and reliable transportation in and out of the County. There are other factors that set Humboldt Bay apart from other coastal seaports, such as a small local market size, the remoteness of Humboldt County, and bay navigation hazards.

Historically, CDI activities around the bay have involved a combination of general manufacturing together with shipping. In the early days, saw mills occupied much of the areas currently zoned MC, and lumber was manufactured and exported. Later, shipping involved logs and chips, with processing still occurring in the MC zoned areas. Today, unlike other California ports, port related activity for Humboldt Bay has decreased significantly, with only a fraction of the MC land around the bay used for CDI purposes.

Decline of CDI Uses

Indications of an excess of CDI land around Humboldt Bay exist in various documents, with excerpts from some of these documents included below and shown in italics. The County is preparing to undertake an inventory and assessment of CDI lands around Humboldt Bay as part of the Humboldt Bay Area Plan update, for the purpose of determining if there is an excess of such lands, which could result in future rezoning for other uses.

1. The Industrial Siting Study, January 1981- This report, prepared for the County notes: *There are nine dry-cargo docks in Humboldt Bay. One dock, Kramer Dock, is dilapidated and being taken down, and three other docks are in need of short-term repairs. According to the QRC Report (An Economic Development Action Plan and Strategy for Humboldt County, California, 1978), all of the operating docks are underutilized, with the possible exception of the Crown-Simpson dock. The report reviewed projections of future waterborne shipments and several facilities expansion proposals, including roll-on/roll-off terminal facilities, containerized shipping, public agency owned and operated docks, and establishment of a foreign trade zone. The report gave negative recommendations to all these proposals based on the lack of potential expansion of shipments: "In short, there is little potential that the current cargo-mix will substantially expand in the future. Further, there are few positive indications that a new product-mix that will increase the use of Humboldt's terminal facilities will occur in the foreseeable future. (QRC Report, p. 115)"*
2. Technical Memorandum prepared by LACO, March 2015 - In 2003, the Harbor District in partnership with the City of Eureka and the County, prepared The Port of Humboldt Bay Harbor Revitalization Plan aimed at establishing a new and sustainable maritime focus for the community. The plan identified 16 key sites that together consist of 80 parcels, "all current and potential marine industrial and commercial property in Humboldt Bay from the Samoa Bridge (CA 255) to the end of Fields Landing Channel on the mainland, and from the Samoa Bridge to the channel entrance on Samoa Peninsula" for consideration in the preparation of the Harbor Revitalization Plan. A 2014 Technical Memorandum prepared by LACO compared the 2003 status of these 16 key sites per the Harbor Revitalization Plan with the 2014 status of these sites to assess the growth or decline in demand for CDI properties and associated facilities, in particular covered warehouse/storage facilities (this report was prepared for a project that involved these types of uses at Fairhaven).

The LACO report concludes that there has not been a substantive increase in demand for CDI sites since the completion of the Harbor Revitalization Plan. *"This is evidenced by the removal or deterioration of over 2,500 linear feet of dock facilities, and a change to inactive status of another*

2,500 linear feet of dock facilities on several key sites. This inactivity appears to be directly related to the significant decline of forest products-related industries, including pulp, stud, and lumber manufacturing. In addition, the global log market is currently highly competitive and has led to a decline in local overseas shipping of whole logs." . . . "Based on the comparison between facilities and levels of use, there appears to be a surplus of dockside facilities and property on Humboldt Bay. While aquaculture and mariculture have remained a strong local industry and shows signs of some growth, especially along the Samoa Peninsula, there has not been an emergent demand for the large supply of coastal-dependent industrial properties around Humboldt Bay."

3. Eureka 2040 GPU, Economic Development Policy Paper – This paper notes: *Despite a broad array of maritime activities, decades of decline in the timber and fishing industries have greatly reduced the volume of activity taking place at the Port of Humboldt Bay. With continued declines in port activity, some question whether the traffic will be sufficient in the future to justify the expense of dredging the channel and employing pilots to guide ships into the harbor. With the loss of many of its major users (e.g., the pulp mills), the Humboldt Bay Harbor, Recreation, and Conservation District (HBHRCD) is already experiencing financial hardship, making the continued maintenance of port infrastructure and the dredging of the deep water channel topics of utmost concern to many area residents and policy makers. This paper makes several recommendations to address vacant and underutilized CDI land, including noncoastal-dependent interim uses.*
4. Eureka GPU 2040 Background Report, Economics Chapter - Table 3-15 of this document summarizes assessable cargo loaded and unloaded in the bay from 1995 through 2013, and also tracks cargo activity for all northern California ports combined for that same period. *The data show a significant decline in overall Eureka area cargo activity, such that by 2013, total cargo volume was about five percent of the 1995 volume, with lumber/logs as the only remaining cargo type since 2011. 2010 was the last year in which the port handled general cargo, 2009 was the last year that the port handled containers, and 2007 was the last year that the port handled bulk cargo. Meanwhile, ship cargo activity has increased substantially at Northern California ports as a group, increasing about 50 percent in assessable tonnage since 1995.*

It is likely that a primary reason for the disparity between the performance of the Port of Humboldt Bay and the Northern California ports as a group is that much of the growth in West Coast maritime shipping activity is due to increased trade with Pacific Rim countries, particularly imports of goods to the U.S. Meanwhile, the Port of Humboldt Bay has primarily been an export-oriented port, with a focus on forest products. Due to environmental regulations and other factors, exports of forest products from Humboldt Bay have declined. Due to the relatively small size of the local market area, combined with limited transportation access from Eureka to other markets elsewhere on the West Coast and beyond, it is difficult for Humboldt Bay to compete with other locations as a port of entry for imports. As a result, Humboldt Bay has not participated in the general increase in trade and port activity that has increased port activity elsewhere on the West Coast. As discussed later in this chapter, long-term population growth within Eureka and elsewhere in Humboldt County is expected to be modest, meaning that there will be limited increases in local demand for products shipped via the port.

5. Eureka GPU 2040, Memorandum – CDI Land Supply and Demand, BAE, April 10, 2015 - This memo was prepared for the City of Eureka as part of their General Plan Update process to provide focus on whether current and projected economic conditions indicate that it is appropriate for the City and the Coastal Commission to consider allowing for non-CDI activities on land designated for CDI activities. The memorandum contains a number of initial conclusions, including the following: *Analysis of economic trends and conditions contained in the Community Background Report (Eureka GPU 2040) indicates that Eureka's legacy Coastal Dependent industrial uses, including fishing and Port of Humboldt Bay port activities (primarily the shipment of timber and wood products) are stable at best (fishing) or have declined drastically (Port cargo handling). Due to environmental constraints, which limit the potential for increasing fish landings and timber harvests, and landside transportation constraints, which limit the potential for attraction of other industrial activities which might also use the Port for importing raw materials or shipping finished goods, there is*

limited potential for increased Coastal Dependent industrial activity within the City of Eureka and the greater Humboldt bay area. Limited exceptions to the above conclusion include possible growth in demand for facilities related to growth in the Port of Humboldt Bay aquaculture industry and the potential need for a new cold storage facility, which would potentially serve the local fishing fleet and aquaculture producers, as well as other non-Coastal Dependent businesses that need to store perishable goods.