

From: Michele McKeegan
Sent: Monday, December 7, 2020 2:13 PM
To: Britni Anderson <banderson@humboldtby.org>
Subject: Message from Website

Dear Commission members,

I know that the issue of billboards is coming up on Thursday.

As a representative of Keep Eureka Beautiful, I wanted to urge you to please stick by your decision to limit billboards. There will be great pressure from our local sign company to soften it but I hope you will remain firm in the knowledge that the general public detests billboards.

Thank you for attending to this issue,

Michele McKeegan



December 10, 2020

Humboldt Bay Harbor, Recreation, and Conservation District
P.O. Box 1030
Eureka, CA 95502
Sent via email

Dear Director Oetker and Commissioners,

On behalf of Humboldt Baykeeper's board, staff, and members, I submit these comments on the draft Amendment No. 2 to Ordinance No. 7, which implements the Humboldt Bay Master Plan. The original ordinance was adopted in 1976, and we applaud the District for taking action at long last to implement the prohibition on all signs and related structures in the District's tidal and submerged lands except those related to navigational, public safety, resource management and identification purposes.

Humboldt Baykeeper strongly supports the orderly removal of existing billboards, as well as the prohibition of new billboards within the District's jurisdiction at Section 2 (f) (1) (a) of the draft amendment.

We have some concerns that we think would clarify and improve the ordinance as follows:

Non-Conforming Billboards and Off Premises Signs Elimination

Section 2 (f)(1)(c)(1): The 5-year amortization period should not be subject to rebuttal. The proposed 5-year end date for elimination is more than reasonable; in fact, we prefer that they be removed sooner. At a minimum, the ordinance should clarify when the 5-year amortization period begins. We support the start date being the date that Amendment No. 2 is adopted.

Maintenance, Repair or Reconstruction

Section 2 (f)(1)(d): This provision should apply to repair or reconstruction started within *six months* (not one year as stated in the draft), consistent with the Outdoor Advertising Act (14 CCR § 2443).

Mailing Address: 600 F Street, Suite 3 #810
Office: 415 I Street, Arcata, CA 95521
(707) 499-3678

www.humboldtбайkeeper.org



Maintenance, Repair or Reconstruction in Environmentally Sensitive Habitat Areas

Section 2 (f)(1)(d)(1)(i) and (ii): Development in Environmentally Sensitive Habitat Areas (ESHA) requires California Coastal Commission approval (either an exemption or a permit), and the District should notify the Commission of permit applications for any work proposed in ESHA, regardless of the level of the water at the time the work is done.

Compliance with UBC Standards to Protect Public Safety

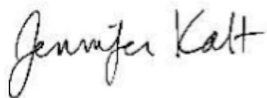
Section 2 (f)(1)(d)(1)(iii): Repairing or replacing existing piles and reattaching anchors must protect public safety by ensuring that the structure complies with Universal Building Code standards. In 2005, a billboard in the District's jurisdiction blew down and landed on U.S. Highway 101, causing a public safety hazard. Simply reattaching the anchors can pose a threat to public safety.

Administrative Permit Process

Section 2 (f)(1)(d)(2): The process for Administrative Permits appears to be contained in Ordinance No. 4, while the draft references Ordinance No. 14, Section 1.09, which limits permits (other than dredging permits) to one year.

Thank you for the opportunity to comment on this draft amendment to Ordinance No. 7. We look forward to the day when Humboldt Bay's tidal and submerged lands are finally rid of these commercial billboards that have blighted our views and public trust resources for decades.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Kalt". The signature is written in a cursive, flowing style.

Jennifer Kalt, Director

jkalt@humboldtkeeper.org