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February 12, 2008

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Kirk Girard, Director
 H. C. Community Development Services Dept.
 3015 H Street
 Eureka, California 95501

Re: General Plan Update Meeting

Dear Kirk:

This letter is written as a follow up to our meeting with you on January 31, 2008 regarding the General Plan update. Our comments center on the Infrastructure Technical Report and Infrastructure and Circulation Elements. We continue to advocate that infrastructure is key to the future of the County.

We advocate that the County stop the General Plan update until the infrastructure/ circulation issues are fixed. A successful fix would be characterized by, among other things, the CSDs, the Humboldt Bay Municipal Water District, the cities of Eureka and Fortuna planning and engineering departments and the County Public Works Department all acknowledging that their concerns have been addressed and resolved.

In the end, we suggest the County would experience the most success by returning to the existing 1984 General Plan and updating that document. The current update process is in trouble and the Plan content is fraught with too many problems to be salvageable.

Infrastructure

Funding of infrastructure improvements is critical to implementation of the General Plan. If funding is insufficient then implementation will not materialize. The County has identified developer impact fees as a funding source. However, they are only one of many funding sources. We suggest that the County should not over rely on these fees. The development/real estate community cannot be fairly expected to carry any more than its reasonable share of such costs. And it should be recognized that in no way will this share solve all the infrastructure problems.

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We understand that other counties in California face the same funding problems and that they are all competing for limited state and federal funds. It is imperative that Humboldt County succeed in this competition and we urge the County to give very high priority to pursuit of such funding. Your comment that the Board of Supervisors is apprehensive about the infrastructure issue and that it is not clear the Board supports the idea of the County getting into the infrastructure business is disturbing. We believe the County should be involved with infrastructure. The County is responsible for roads, the most troublesome of the infrastructure issues. We advocate that the Board of Supervisors specifically direct the Community Development Services Department to dedicate more staff and staff time to resolving road issues.

Housing

The County should not ignore rural housing on large lots with septic systems. This type of housing is an important part of the housing supply. This "move-up market" creates needed lower cost housing as sellers move on. Rural development must continue along with urban development in order for this dynamic to continue. In rural counties such as Humboldt, there will always be the need for a residential mix characterized by a variety of pricing and range of distribution between rural and urban housing.

Annexations and Spheres of Influence

We support annexation options and expansions of Spheres of Influence. These are the areas in which new housing will appear. It is important that the General Plan EIR consider these alternatives because having a completed EIR will help defray expansion costs for under-funded CSDs.

Problems with the reports

We have reviewed a number of letters posted on the County's General Plan website and memos from interested parties on the Infrastructure Technical Report and the Infrastructure and Circulation Elements. We find a repeating message that there are problems with these documents.

From a Jan. 7 memo from the HDR Company, an architectural/engineering firm hired by the HELP group to peer review the Technical Report:

There is no presentation of the economic and social conditions along with development [activity] that would drive development toward the low or high build-out [scenarios].

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This is similar to the point we have been consistently making about the "net developable land" issue. The Technical Report does not account for market forces or other *economic* realities in its analysis as we have been suggesting it should and as indicated by this peer review report. Because of this, we continue to believe that the County has yet to develop a dependably accurate picture of how much land is realistically available for development. It is vitally important to get this land inventory picture right in order for us to meet the housing needs of the County's future.

From a City of Eureka Community Development Department Jan. 14 letter:

A more regional approach to transportation planning that identifies the effects of County land use plans on the City should be undertaken by the County.

The City is concerned that the County is unable to establish specific goals and policies for its transportation system....

There appears to be a disconnect between the Technical Report and the Element.

...it appears important City comments previously provided by City staff to Winzler and Kelly were ignored.

From a Humboldt Community Services District January 15 letter:

There are requested changes [to the document] consist[ing] of corrections of factual information....

We feel that many...sections [of the Report] are not necessary as part of the General Plan.

From a County Public Works Jan. 17 memo:

The Dept. has requested that the authors undertake a substantial review of the data to address the Department's concerns.

Some traffic issues do not appear to be resolved.

The chapters in the General Plan must coordinate with the current update of the Regional Transportation Improvement Plan. Lack of coordination may result in funding for local projects being withheld.

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From a County Public Works Jan. 31 memo:

The circulation element needs to identify on maps the proposed circulation routes necessary for the orderly build-out of the various communities.

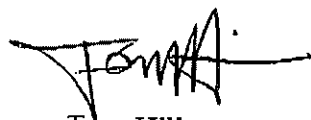
These routes should then be modeled into the traffic model to determine what effect they will have on the traffic circulation for the various communities.

Conclusion

There is also the question as to whether the County has the funding and staffing to implement the scores of new proposals presented generally in the Plan. As we have commented before, much of the McKinleyville Community Plan has never been implemented due to lack of funding. The Association believes the same could result with the General Plan.

We appreciate your time and interest in the Association's viewpoint on these important issues.

Sincerely,



Tom Hiller
President



Debbie Provolt
Co-Chair General
Plan Sub-Committee



Victoria Copeland
Co-Chair General
Plan Sub-Committee

cc: H. C. Planning Commission
H. C. Board of Supervisors