

## Spencer, Martha

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**From:** Virginia Graziani [virginia.graziani@yahoo.com]  
**Sent:** Monday, March 09, 2009 12:16 PM  
**To:** Spencer, Martha  
**Cc:** Clendenen, Cliff; vgraziani@aeesolar.com  
**Subject:** Comments on Housing Element DEIR

Dear Planning Commissioners and Staff:

Following are my comments on the DEIR for the Housing Element. My comments are written with the understanding that the County is working on a tight schedule, with its deadline looming in August, and that it is hampered by the lack of RHNA figures from HCAOG. Unfortunately, this DEIR shows signs of being composed in haste without due consideration being given to critical details.

First and most importantly, in nearly every impact category the DEIR asserts that because it is supplemental to previous EIRs, impacts are not significantly greater than previous impacts. This fails to take into account cumulative impacts in these categories. This flaw is exacerbated by the likelihood that the reduction in household size (1.2 members per household down from approximately 2.5 in the last cycle -- a decrease of 50%!) could as much as double the required allocations.

Likewise, the reliance on comparison with past EIRs does not allow consideration of new CEQA standards on greenhouse gas emissions, or on the other hand, the advance of new technologies that make it less costly and more efficient to develop safe, pleasant, and attractive higher-density housing at all income levels.

In some cases the DEIR asserts impacts that have been "significant and unavoidable" in the past without any further examination of whether they are still unavoidable. The DEIR does not address the failure of past Housing Elements to successfully avoid the impacts noted in previous EIRs. For example, rather large numbers of housing units were built in areas that suffered impacts in the last cycle, according to the DEIR. Section 5 indicates that, for example, 315 units or 13% of total units built, were built in areas where they had aesthetic impacts, 385 units (16% of total) were built in areas where they resulted in impacts to biological resources, and 407 units (17% of total) were built on agricultural resource lands. Clearly, past mitigation had not worked! Without commitment to improved mitigation, things can only get worse this cycle. Additionally, the past cycles' reduction in aesthetics, diminishment of biological resources, and land available for agriculture needs to be accounted for in this DEIR (i.e., cumulative impact).

In general I agree with the comments that will be presented to you by the Healthy Humboldt Coalition. In particular, I believe the County should develop a land inventory that would meet RHNA allocation entirely within UDA's. While I support the owner-build alternative and would like to see more work done to bring it up-to-date with new technologies, I do not think it will result in significant lower-income housing because of the cost of land. Rural AOB also does not meet the need for lower-income housing to be near services and legal employment opportunities.

Unfortunately the current land use inventory includes over 30 pages, or approximately 1400 + listings, in Shelter Cove. Many of those lots are unbuildable, and as Healthy Humboldt points out, should be designated as "open space," not as RL or RM. In any case, Shelter Cove is nearly entirely a retirement or second-home community, due to its lack of urban services and employment opportunities, and its distance from the "urban" center of Garberville-Redway, 20 miles of very slow, narrow, steep, winding, and in winter weather, treacherous and icy, road -- not a viable commute for most people.

I may be in disagreement with Healthy Humboldt regarding the RR and RE land use designations, which I believe create vital buffer zones between urban areas and resource or open lands. This can be discussed further when commenting on the Land Use Element. I would agree, however, that RR and RE cannot be considered when looking at affordable or lower-income housing allocations.

Recognizing the necessity of meeting our August deadline for approval of the Housing Element, I urge the Planning Commission to direct staff to devote their time to rewriting this DEIR to adequately and specifically address the issues above, even though it may mean postponing other elements of the General Plan. I also urge the Commission to do whatever it can do to ensure that we get the RHNA numbers in time to be incorporated into our Housing Element.

Thank you for your consideration,

Virginia Graziani  
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