

The Healthy Humboldt Coalition

May 10, 2007

Planning Commission
Community Development Department
3015 H Street
Eureka, CA 95503

**Re: Chapter Group 4 Policies
Economic Development**

Dear Commissioners and Staff,

We are writing to provide comments and specific recommendations regarding the recently released draft policies for the Economic Development Element for the General Plan Update. While we are generally supportive of the direction established by the staff's document, we do have some specific concerns which we believe must be addressed to ensure the document's consistency with other elements and with the General Plan's Guiding Principles, and to ensure the adequacy of the forthcoming EIR.

The document lists draft policies for Alternative B, with occasional alternate policies for Alternatives A and C. There are a number of policies which are listed for Alternatives B and C which are excluded for Alternative A. We understand that the purpose of this is to assure that each alternative brings with it its own suite of policies. However, most of the omissions for Alternative A appear to be arbitrary, and are inconsistent with the Guiding Principles for that alternative.

The Staff's document reads:

"Plan Alternative A includes many of the components of Alternative B, but as an environmentally superior alternative, some wording and policy choices are presented that are less robust toward economic development initiatives, particularly those that might be high impact or growth inducing, such as road, rail, and airport expansions. Alternative A does not accommodate big box in the unincorporated area."

Staff's presumption that a 'robust' economic development policy is somehow at odds with an 'environmentally superior' General Plan is misleading and completely unsupported by any facts or data. More to the point, this assertion is completely contradictory to the narrative in the staff's own document.

The policy document identifies nine base industry clusters, none of which are in any way at odds with the focused-growth approach of Alternative A. In truth many, if not all, of these industries would likely *benefit* from the increased protections for resource lands, scenic beauty and quality of life presented in Alternative A, making it quite likely the best and most robust alternative for economic development. Our comments in this letter are primarily an attempt to remedy that inconsistency, so as to ensure that the policies ascribed to each alternative are consistent with that alternative's goals.

There are numerous policy choices which are omitted from A for no apparent reason. Some of these omissions create the false impression that something in the nature of Alternative A would somehow be at odds with the desire to create a strong and stable economy. We have provided our own recommendations below and in the attached table.

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The version of policy ED-G1 which is listed for Alternatives B and C reads:

ED-G1. Stable Economy. To enhance and maintain a diverse, stable, and growing local economy with an emphasis on base and emerging industries, innovation, entrepreneurship, and global competition.

The version listed for Alternative A reads:

ED-G1. Stable Economy. To maintain a diverse, stable local economy with an emphasis on strengthening existing local industries.

Again, this gives the false and unsupported impression that Alternative A would not foster economic growth, and would not support emerging industries, innovation, entrepreneurship or global competition. The reasoning for this is not given. We ask that staff reference the recent "Targets of Opportunity" report, which clearly shows the high premium placed on open space, environment, and quality of life by those business which are thriving locally. An accurate goal for Alternative A should include all of the goals listed in ED-G1, plus the reference to "*strengthening existing local industries.*"

It is equally inconsistent to include Alternative C in policy goal ED-G1. As a 'free-market' approach to our future, the County should not be making any judgements about what kind of economic growth it will be supporting, and should allow the County's economic fortunes to rise or fall upon the whims of the market. There should be no presumption that a less-controlled market will be a good thing for us in Humboldt County.

Goal ED-G4 is also improperly omitted from Alternative A, and equally improperly listed for Alternative C. If government is to 'get out of the way' of industry, then it should be making no presumption as to the type of workers that will be needed by industry in the future, nor should it have any obligation to provide for those industries.

ED-G5 falsely assumes that clarity and specificity regarding land use is somehow at odds with timely and efficient processing of permits. If anything, such clarity should make permitting smoother. On the other hand, the lack of specificity in Alternative C should be assumed to be a recipe for permitting gridlock when it comes to implementation. G5 should apply to A, and not C.

Alternative A should also be assumed to have the most efficient and best planned infrastructure for transportation and wastewater, where C will be unplanned and inefficient. Thus, G6 should also apply to A and not C.

We have provided these corrections in the attached table, shown in markup.

Sincerely,

Mark Lovelace
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Table 11-1. Plan Alternatives Comparison Chart

Plan Alternative			Goals	Staff Remarks	Vote: R, D, M
	B	€	ED-G1. Stable Economy. To enhance and maintain a diverse, stable, and growing local economy with an emphasis on base and emerging industries, innovation, entrepreneurship, and global competition.	See alternative wording below	
A			ED-G1. Stable Economy. To <u>enhance and maintain a diverse, stable, and growing local economy with an emphasis on base and emerging industries, innovation, entrepreneurship, global competition</u> maintain a diverse, stable local economy with an emphasis on and strengthening existing local industries.	Plan A alternative wording	
		C	ED-G1. Que Sera Sera. <u>Whatever happens happens, and we will live with it.</u>		
A	B	C	ED-G2. Broadband Internet. To establish a reliable broadband internet infrastructure that distributes a choice of economically accessible broadband services into our most rural communities, and is not vulnerable to disruption. Integrate broadband service capability into new buildings and developments. Provide broadband access in remote or rural communities.		
A	B		ED-G3. Quality of Life. To attract and retain young talent by developing vibrant town centers that incorporate a mix of employment, housing, and retail uses as well as access to child care, transportation, and cultural and natural amenities.		
A	B	€	ED-G4. Skilled and Ready Workforce. To foster a local workforce that is prepared to succeed in the industries growing in Humboldt County, which values early education, vocational training, and lifelong learning.		
A	B	€	ED-G5. Streamlining. To implement permitting and licensing processes that are more responsive to the needs and timelines of the marketplace, particularly for microenterprises and home-based businesses.		
A	B	€	ED-G6. Transportation Networks. To have transportation facilities that allow freight mobility along the interstate highway system and provide connectivity between residential neighborhoods and employment centers.		

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A	B			ED-G7. Public Water and Wastewater. To have and maintain adequate public water and wastewater facilities to accommodate workforce housing and provide opportunities for businesses to grow.		
A	B			ED-G.8 Natural Resource Assets. To protect productive agricultural, mineral resource, timber, and coastal dependent lands.		
A	B			ED-G9. Brownfields. To clean up and reuse brownfield sites.		
A	B			ED-G10. Cooperation and Collaboration. To build and maintain partnerships with cities, neighboring counties, and the private sector that build and enhance common assets and resolve common obstacles.		
A	B			ED-G11. Economic Development Assistance Programs. To administer and support financial and technical assistance programs that support workers, businesses, and service providers.		
A	B			ED- G12. Informed Public. To educate County residents of economic trends, emerging markets, innovations and opportunities for entrepreneurship that benefit the region's economic prosperity.		
			C	<u>ED-G12. Public kept in the Dark. The public shall have neither a role nor a voice in our economy.</u>		
<i>Plan Alternative</i>				<i>Development Policies</i>	<i>Staff Remarks</i>	<i>Vote: R, D, M</i>
A	B			ED-P1. Prime Employment Land Protection. Identify and protect prime employment lands from conversion and encroachment of conflicting uses.		
	B		€	ED-P2. Airport Expansion. Support expansion of the airport to include service to major airport hubs and expanded flight schedules.		
A	B			ED-P3. Broadband Internet. Promote the provision of broadband infrastructure in all communities.		
A	B			ED-P4. Workforce Housing. Promote the development of workforce housing and mixed-use housing around multi-modal transportation options.		
A	B			ED-P5. Child Care. Promote the provision of child care facilities within business, commercial and industrial centers and housing developments.		

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<i>Plan Alternative</i>	<i>Investment Policies</i>			<i>Staff Remarks</i>	<i>Vote: R, D, M</i>
A	B		ED-P6. Revitalization. Promote the revitalization of underutilized lands in communities in transition due to the decline of resource-based industries.		
A	B		ED-P7. Brownfields. Consider land use designations for brownfields to encourage cleanup and reuse.		
A	B		ED-P8. Commercial and Industrial Sites Database. Maintain a commercial and industrial sites database and continue to improve accessibility to online information on commercial and industrial property.		
A			ED-P9. Commercial Retail. Large format “big box” commercial uses shall not be located in the unincorporated area to avoid sprawl.	Plan A alternative wording	
	B		ED-P9. Commercial Retail. Include standards for discretionary review of large format “big box” commercial uses to reduce their land use impact.	Plan B alternative wording	
		C	ED-P9. Commercial Retail. Include standards for discretionary review of large format “big box” commercial uses.	Plan C alternative wording	
	B		ED-P10. Industrial Parks. Where appropriate, promote development of well planned and designed industrial parks catering to existing local, as well as outside opportunities. Encourage master environmental assessments for industrial parks in order to streamline the subsequent development process.	From Framework Plan	
<u>A</u>			<u>ED-P10. Industrial Parks. Where appropriate, promote development of well planned and designed multiple-use centers which include industrial, commercial, and residential development within a cohesive, walkable area.</u>		
<i>Plan Alternative</i>	<i>Investment Policies</i>			<i>Staff Remarks</i>	<i>Vote: R, D, M</i>
A	B		ED-P11. Financial Resources. Acquire and distribute financial resources for workforce training, economic research, infrastructure, and business development.		
	B	C	ED-P12. Freight Mobility. Pursue financial and technical solutions to provide reliable interstate truck access on both U.S. 101 and State Highway 299.		

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<i>Plan Alternative</i>	<i>Partnership Policies</i>			<i>Staff Remarks</i>	<i>Vote: R, D, M</i>
B	C		ED-P13. Broadband Internet. Support the development and management of a redundant fiber optic line that connects to the fiber backbone running along the U.S. 5 corridor. Support the expansion and delivery of broadband Internet in the rural or remote communities in the county through all appropriate technologies.	See alternative wording below	
A			ED-P13. Broadband Internet. Support the expansion and delivery of broadband Internet in the rural or remote communities in the county through all appropriate technologies.	Plan A alternative wording	
A	B		ED-P14. Workforce Housing. Encourage production of housing at a price commensurate with income levels, and a transportation system to provide efficient connectivity between housing and places of employment to maintain satisfactory commute travel times and distances.		
A	B		ED-P15. Public Infrastructure. Pursue and distribute funding and technical assistance to upgrade and enhance the water and wastewater facilities of communities.		
A	B		ED-P16. Brownfields. Pursue and distribute funding and technical assistance to assess, clean up, and reuse brownfields.		
<i>Plan Alternative</i>	<i>Partnership Policies</i>			<i>Staff Remarks</i>	<i>Vote: R, D, M</i>
A	B		ED-P17. Job Growth. Collaborate with economic development entities in the region to promote job growth, technical innovations, and entrepreneurship in base and emerging industries.		
A	B		ED-P18. Workforce. Work with the education and private sectors to promote education, vocational training, professional development, and lifelong learning.		
A	B		ED-P19. Cities and Counties. Collaborate with cities and neighboring counties to identify and implement regional economic initiatives that benefit base and emerging industries.		
A	B		ED-P20. Child Care. Foster private/public partnerships with child care service and information providers.		

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<i>Plan Alternative</i>				<i>Implementation Measures</i>	<i>Staff Remarks</i>	<i>Vote: R, D, M</i>
A	B			ED-IM1. Ordinances. Update ordinances related to economic development for consistency with the uses of base and emerging industries.		
A	B			ED-IM2. Commercial and Industrial Sites Database Mapping. Update the Commercial and Industrial Sites Database on a two-year cycle and provide online maps of vacant industrial and commercial properties using the County’s Geographic Information System.		
A	B			ED-IM3. Broadband Deployment. Revise subdivision regulations to provide infrastructure for broadband internet.		
A	B			ED-IM4. Programs. Support technical and financial assistance programs, including delivering capital, technical expertise, and training to businesses starting up and expanding.		
	B	C		ED-IM5. Streamlining. Provide regular review and improvement of ordinances and permit processes to increase efficiency and reduce permit processing times for strategic targets such as, but not limited to, microenterprises, home based-businesses, and workforce housing.		
A	B			ED-IM6. Child Care. Investigate and support financing tools that leverage public and private funding to increase the establishment, rehabilitation, expansion, and viability of child care facilities.		
A	B			ED-IM7. Informed Public. Conduct and public economic research relating to emerging markets, innovations, and opportunities in which the region may have competitive advantages.		
<i>Plan Alternative</i>				<i>Existing Framework Plan</i>	<i>Staff Remarks</i>	<i>Vote: R, D,</i>
			D	1. Promote economic development by coordination of efforts with both local economic development organizations and members of the private sector.	Replaced by P16, P17. P18 and P19	

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			D 2. Encourage a diverse range of commercial and industrial development consistent with community goals and the level of services provided in each of the cities and communities.	Replaced by G1, P1 and P9	
			D 3. Continue to provide for, through General Plan amendments and zoning revisions as needed, an adequate supply of commercial and industrial land to maximize opportunities for development.	Replaced by P1, P7, P9, IM1, and IM2	
			D 4. Prevent the loss of designated industrial lands to other uses requiring permanent facilities.	Replaced by P1	
			D 5. Ensure that industrial or commercial development which requires provision for public water, sewage disposal, roads and other needed utilities and services is placed in a suitable urbanized area.	Replaced by P14	
			D 6. Allow Resource Dependent Industrial uses outside of urban areas when such uses are: <ul style="list-style-type: none"> • dependent upon close proximity to resource production lands, and • not dependent on urban services. 		
			D 7. Where appropriate, promote development of well planned and designed industrial parks catering to existing local, as well as outside opportunities. Encourage master environmental assessments for industrial parks in order to streamline the subsequent development process.	Included as P10	
			D 8. Locate commercial development in appropriate community centers that will assist and supplement existing commercial activity.	Replaced by P9	
			D 9. Discourage strip commercial development, where appropriate.		
			D 10. Encourage the economic opportunities for production facilities that efficiently utilize all products and by-products of forestry, fishery, or agricultural uses.		
			D 11. Maximize local energy opportunities from the renewable resources found in the County.		
			D 12. Encourage innovative methods for pollution reduction and waste product disposal and utilization.		

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