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January 28, 2008

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Humboldt County Planning Commission
Community Development Services Department
3015 H Street
Eureka, California 95501

HUMBOLDT COUNTY
PLANNING DIVISION

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EXECUTIVE OFFICER Lois Lee Busey

Re: General Plan Update - Circulation Element

Dear Commissioners:

This is a comprehensive and detailed element. There are very informative explanations of traffic "engineerspeak". For example, designating a "Level of Service" (LOS) is explained as a way to describe how crowded a road is. In many instances the report lists a very low LOS which is another way of saying there are major problems with roads in the County.

Roads may well be the most constraining factor for future development. The report states "many roadways are designed well below the function they have come to serve." In other words they are already at a problem stage. Table 8-7 (pg. 8-34) shows sections of several main roads are already carrying traffic beyond their intended design.

These roads are rated as overburdened. They have a Level of Service "D" rating at peak hours which means heavy traffic is not moving efficiently. As the report says "Level[s] of Service D and worse are not generally appropriate design criteria in rural areas. This provides no room for future growth." [emphasis added]

Roads appear to be the controlling factor regarding new development, but there are very limited funds available to improve or construct them. It should be recognized that roads must keep up with the demand for new housing and that securing funding for road improvements is paramount. To insure that roads are capable of handling increasing traffic is good planning.

We support bike and pedestrian trails wherever possible without intruding on private property rights or imposing development fees for their funding. The question is who is going to pay for these improvements? If these costs are passed on to developers, they will in turn be passed on to home buyers. This price escalation exacerbates the housing affordability issue. If costs become too high, projects will not be built. Limiting supply only contributes to the

erosion of housing affordability. There is also concern as to what happens if the public right of way is not large enough to accommodate bike/pedestrian pathways? Does this lead to condemnation of private property? We do not support this kind of incursion on private property rights.

In addition, we would appreciate your consideration of the following:

- **Policy C-P9.** "Mitigation Measures". Mitigating on- and off -site transportation improvements. It appears this issue is already addressed in county regulations. Why is it included in this Element?
- **Policy C-P10.** "Tracking Road Improvement Requirements". It appears this is a Public Works issue. Why is it included in this Element? There are several other Public Works related policies proposed. Are they duplicative of current Public Works regulations? It would be helpful if existing Public Works rules were shown for comparison.
- **Policies C-P17, C-P18 and C-P19.** "Road Construction and Maintenance." These issues are covered under the existing County Grading Ordinance. Why are they included in this Element?
- **Policies C-P36 and C-P37.** Trails are discussed here and in other places in the Element. There is concern regarding possible conversion of private property to public trails.
- **Policies C-P39 and C-P42.** "Integrate social transportation services...." The discussion about transportation issues and public health should be addressed through the Public Health Department and not in the General Plan.
- **Policies C-S13 and C-S14.** "Robinson/Dunn Project" and "McKay Tract Improvements" respectively. It is inappropriate to name individual projects in the General Plan. It would be better to list AP numbers so that successive owners are aware of what is being proposed for their property.
- Several policies from the McKinleyville Community Plan (MCP) are proposed for adoption. Many of these policies have never been enacted due to a lack of funding and therefore may be too impractical for inclusion. We also note that the update of the MCP was extremely contentious. After lengthy and argumentative Citizens Advisory Committee discussions, there were multiple instances when policies were just barely voted in by only the slimmest of margins. It would be difficult to describe the MCP as a document adopted by overwhelming consensus. For these reasons we advocate that the proposed policies identified as from the MCP should remain in McKinleyville and should not be folded into the General Plan.

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- There are several "New Urbanist" and "Smart Growth" policies regarding neighborhood design. We feel these attempts at social engineering are not applicable to rural areas such as Humboldt County and are inappropriate for consideration in this General Plan.

Please note that we did not find this Element posted on the County's website until January 12, less than ten days before the January 17 Planning Commission meeting. And as regards process, we recommend that when the Planning Commission begins its deliberations they review the chapters in numerical order so that the public can more easily follow the process.

We appreciate your consideration of our comments and look forward to continued participation in the General Plan update.

Sincerely,

  
Tom Hiller  
President

  
Dave Varshock  
Government Relations Chair

Attachment

cc: H. C. Board of Supervisors  
Kirk Girard, Community Development Services Director