



HUMBOLDT ASSOCIATION OF REALTORS® INC.

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January 11, 2008

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Humboldt County Planning Commission
Community Development Services Dept.
Planning Division
3015 H Street
Eureka, California 95501

RECEIVED

JAN 14 2008

HUMBOLDT COUNTY
PLANNING DIVISION

Re: Humboldt County General Plan Update
Community Infrastructure and Services Element

Dear Commissioners:

The Humboldt Association of REALTORS® has reviewed this element and has concerns about the introduction of a policy regarding infrastructure and services standards. As the report states, “[A] major addition to the infrastructure and services policies is Policy IS-P1, ‘Adequate Public Infrastructure and Services Standards’. This policy adds a requirement to the [process] of discretionary development review to ensure that all necessary infrastructure and services are currently available at the time of project completion.” We ask that the County consider this language carefully because if it is implemented as written, it has the potential to stop development. We suggest the policy could be rewritten to allow for phased development of infrastructure which would allow development to continue.

Policy IS-P27 is also of concern. This policy proposes that permits for home construction should not be issued unless the owner can prove there is fire protection available. This has the potential to virtually stop development in rural areas located outside fire district coverage. We note that County planning staff stated at the December 19, 2007 Forest Review Committee (FRC) meeting that CDF does not intend to offer fire protection for residential structures. The CDF representative sitting on the FRC confirmed this. This effectively precludes rural home construction. The Association proposes that a waiver be created which would release the County from liability while the homeowner assumes responsibility for fire protection. This release would allow construction to proceed.

As stated in our letter regarding the Community Infrastructure and Services Technical Report, we ask why some topics are included in this Element, for

example; street lights, parks and recreation, schools, and public utilities? These were not included in the original scope of work when we reviewed the scope document in February, 2007. The inclusion of what appears to be added topics produces a distraction to more important infrastructure issues. Given this, we suggest no further time should be expended on these subjects.

In addition, although police, fire, stormwater, drainage (including the discussion on culverts) and flood control were listed in the scope of work, we advocate that no additional time should be spent on these either. At least not in the discussion about infrastructure. Perhaps they could be addressed in other elements such as the Safety Element or Open Space Element, as appropriate. We suggest fire and sheriff issues should not even be in the General Plan. They are jurisdictionally separate from the County, not under County control and are already addressed in separate Master Service Plans. We would also like to comment here that the fire districts should be receiving more Proposition 172 money. Presently they receive some 2% of the revenues. This percentage should be increased substantially given the importance of fire protection.

Generally we suggest that each topic should be organized in one place so that anyone would be able to read one element to find all they need to know on a subject, such as placing all fire related issues in the Safety Element, rather than having to look in multiple elements.

Our overall emphasis here is that what we consider the core infrastructures – water, sewer and roads – require the most attention. Given their poor condition, as described in the report, we strongly suggest that the County, from this point forward, focus its energies on these three components.

Implementation measure IS-IM5 states “[a]dopt an impact fee program”. The Association realizes impact fees and other exactions could be part of the future. This is a difficult situation because these costs are passed on to homebuyers who then must pay higher home prices. Consequently, the introduction of impact fees strikes the housing affordability issue hard. To minimize impact fees detrimental price effect, we encourage the County to pursue all other available sources of funding such as grants or low interest loans or other programs as listed in the Community Infrastructure and Services Technical Report to help defray the costs of infrastructure improvements.

There is also the problem of how small scale projects will be expected to pay the exactions being proposed. Typically, projects in this county are relatively small due to our small market size. Therefore economies of scale are not available to mitigate the high cost of infrastructure improvements. Exactions,

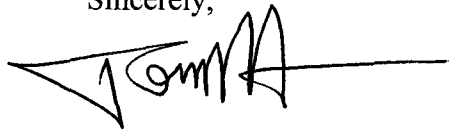
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passed on to buyers, become large percentages of home prices. There is also a timing issue. Residential build-outs and absorption rates are relatively slow in Humboldt County. This makes it difficult to secure bond money or other types of amortized financing because repayment revenue will be slow in coming.

There are many new proposals in this Element. Interpreting them to the benefit of the public is important. Where appropriate we suggest that Public Works and Environmental Health should be the lead agencies in implementation of the goals and policies of this Element.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Tom Hiller', with a long horizontal line extending to the right.

Tom Hiller
President

A handwritten signature in black ink, appearing to read 'Dave Varshock', written in a cursive style.

Dave Varshock
Government Relations Chair

Enclosures

cc: H. C. Board of Supervisors
Kirk Girard, Director
John Miller, Planner
Neal Carnum, Winzler and Kelly

Plan Alternatives Comparison Chart

The "Vote" column is provided for the user to indicate a policy preference. Enter a Retain, Delete or Modify.

<i>Table 12-x. Plan Alternatives Comparison Chart: Goals and Policies, Standards and Implementation Measures</i>					
<i>Plan Alternative</i>		<i>Goals & Policies</i>		<i>Staff Remarks</i>	<i>Vote: R, D, M</i>
A	B			IS-G1 Adequate Infrastructure and Services Provide a full range of adequate public infrastructure and services in support of existing and new development to the extent reasonably possible recognizing funding limitations.	M
A	B	C		IS-G2 Health and Safety. Provide and maintain infrastructure to protect community health and safety to the extent reasonably possible recognizing funding limitations.	M
A	B			IS-P1 Adequate Public Infrastructure and Services Standards. Consider establishing Establish and utilize ing adequate public infrastructure and services standards to: A. Ensure that Promote infrastructure and services needed to support new development, that meet or exceed level of service standards established by the County, are available concurrent considered with the timing of such development; B. Encourage development within infill areas where infrastructure and services are available; and C. Achieve acceptable levels of service (LOS) standards through improvements funded by fair share impact fees and other exactions, planned capital improvements, and the establishment of other service funding mechanisms.	M
A	B			IS-P2 Project Review and Findings. The impacts of new development on public infrastructure and services should be determined during the project review process. and be based on adequate public	M

**Table 12-x. Plan Alternatives Comparison Chart:
Goals and Policies, Standards and Implementation Measures**

			infrastructure and services standards adopted by the Board of Supervisors. As part of project approval, specific findings shall be made which relate to the demand for new public infrastructure and services and how the affect of this demand on adopted levels of service.		
A	B		IS-P3 Requirements for Discretionary Development. Adequate public infrastructure and services shall be used to determine infrastructure and services requirements for new discretionary development. Projects which do not currently have adequate public infrastructure and services, and cannot provide adequate public infrastructure and services concurrently with the new development, shall be scheduled for hearing before the appropriate hearing body with a staff recommendation for denial, on the grounds that the project is inconsistent with the goals, policies, and standards of Community Infrastructure and Services Element of the General Plan.		D
A	B	C	IS-P4 Fair Share Cost Allocation. New development, not existing development, shall pay the cost of providing infrastructure and services needed to serve the development, based on the demand for infrastructure and services that can be attributed to the development.		R
A	B		IS-P5 Comprehensive Development Impact/Fiscal Impact Study. Prepare and regularly update a comprehensive development impact/fiscal impact study that quantifies the relationship between new development and the need for additional public facilities and services. The comprehensive development impact/fiscal impact study shall be used as the basis for establishing measures such as fees, special taxes, and special assessments to off-set the impacts to municipal services and capital facilities.	This should be answered by the Winzler & Kelly Infrastructure Study Report	

**Table 12-x. Plan Alternatives Comparison Chart:
Goals and Policies, Standards and Implementation Measures**

A	B			IS-P6 Infrastructure and Services Funding Sources: Establish broad based funding sources for public facilities and services that benefit current and future residents of the County.		R
A	B			IS-P7 Range of Municipal Services. Encourage existing special districts serving urban areas to expand the range of services they provide, or encourage the creation of new special districts, to ensure that a full range of community infrastructure and services are available to meet community needs.		R
A	B	C		IS-P8 Coordinate with LAFCo. The Planning Department shall Coordinate with special districts, cities, LAFCo and other local service providers to improve information on public service availability, capacity and needs, demographics, and development patterns <u>by reviewing and commenting on proposed spheres of influence, municipal service reviews, annexations, and changes in organization in order to ensure that adequate public infrastructure and services can be provided and for the purpose of maintaining consistency with the General Plan.</u> (FRWK 2622.3)		D
			D	Coordinate with LAFCo. The Planning Department shall Coordinate with special districts, cities, LAFCo and other local service providers to improve information on public service availability, capacity and needs, demographics, and development patterns. (FRWK 2622.3)		M
A	B	C		IS-P9 Spheres of Influence and Community Plans. Spheres of Influence, <u>Municipal Service Reviews</u> , and community plans shall be mutually compatible and supportive of one another for all applicable areas.* (FRWK 2622.1)		D
			D	Spheres of Influence and Community Plans. Spheres of Influence and community plans shall should be mutually compatible and supportive of one another for all applicable areas.* (FRWK 2622.1)		M

**Table 12-x. Plan Alternatives Comparison Chart:
Goals and Policies, Standards and Implementation Measures**

A	B	C		IS-P10 Data Supporting Community Planning. Data generated through developing spheres of influences and <u>Municipal Service Reviews</u> should be used to facilitate the preparation of community plans.* (FRWK 2622.2)		D
			D	Data Supporting Community Planning. Data generated through developing spheres of influences should be used to facilitate the preparation of community plans.* (FRWK 2622.2)		R
A	B	C		IS-P11 Monitor Infrastructure and Services Capacity. Monitor the capacities of infrastructure and services in coordination with service providers to ensure that growth does not exceed acceptable levels of service.		R
A	B	C		IS-P12 Plan Effectively to Minimize Costs. Plan public facilities in cooperation with service providers to minimize short- and long-term construction, operation, and maintenance costs.		R
A	B			IS-P13 Fiscal Impact Analysis. Use project specific fiscal impact analyses for major development proposals to ensure that approvals do not result in a fiscal impact on the County and other services providers.		D
A	B	C	D	IS-P14 Sizing of Facilities: Through development review, the County shall ensure that facilities are adequately sized to accommodate the proposed development and, if applicable, allow for extensions to future developments.		R
A	B	C		IS-P15 Reimbursement. In order to encourage orderly development, the County may require new development to install off-site infrastructure improvements in excess of fair share capacity and utilize funding mechanisms to reimburse expenditures in excess of the fair share costs.		R
A	B	C		IS-P16 Correct Inadequacies. Coordinate with other service providers to establish infrastructure priorities and correct existing inadequacies in community infrastructure and services systems.		R

**Table 12-x. Plan Alternatives Comparison Chart:
Goals and Policies, Standards and Implementation Measures**

A	B	C	IS-G3 Storm Drainage & Flood Control Safety and Functionality. Provide a safe, functionally effective, well-designed, -built and -maintained storm drainage and flood control system that protects the people and resources of the County.		R
A	B	C	IS-G4 Sustainable Capital Facility Financing. Sustainable revenue sources that protect the County's investment in its capital facilities through adequately funded storm drain and flood control maintenance and improvement activities.		R
A	B	C	IS-G5 County Coordination for System Planning and Management. Consistent County-wide drainage system design standards and maintenance and improvement implementation criteria.		R
A	B	C	IS-P17 Storm Drainage Master Plan. Prepare and update a storm drainage master plan for storm drainage and flood control structures, capacity and condition assessment, and development of a Capital Improvement Plan prioritizing strategy that preserves, enhances and prioritizes investments as follows: A. Priority 1: Safety and system preservation. B. Priority 2: Functional efficiency and functional capacity.		R
A	B	C	IS-P18 Storm Drainage Design Standards. Prepare consistent storm drainage design standards for new development based on a design storm with specified intensity, frequency and duration standards.		R
A	B		IS-P19 Low-Impact Development Standards. Develop storm drainage development guidelines with possible associated impact fee discounts to encourage low-impact development standards to reduce the quantity and increase the quality of stormwater runoff from new developments.		R
A	B	C	IS-P20 Fish Passage Designs. Retrofit existing drainage and flood control structures and design new structures to		R

**Table 12-x. Plan Alternatives Comparison Chart:
Goals and Policies, Standards and Implementation Measures**

				facilitate fish and other wildlife passage, in accordance with federal and state guidelines.		
A	B	C		IS-P21 Funding Sources and Mechanisms. Preserve and enhance storm drainage investments.		R
A	B			IS-P22 Coordinated Agency Activities. Work with other drainage and flood control infrastructure service providers (e.g., Army Corps of Engineers, city public works departments, Regional Water Quality Control Board, USEPA) to coordinate activities related to drainage and flood control system design, development, operations and maintenance where such coordination will result in greater operational and economic efficiency for the overall system.		R
A	B	C		IS-G6 Effective Law Enforcement Service. Provide effective, efficient and timely response to calls for County law enforcement services.	Covered under master law enforcement plan – should not be in element	D
A	B	C		IS-G7 Sustainable Financing Sources. Provide adequate and sustainable sources of funding for Sheriff's Office personnel, equipment and facilities.	Covered under master law enforcement plan – should not be in element	D
A	B			IS-G8 Integration with other Entities. Provide integrated County departmental and city/state agency planning and administration.	Covered under master fire plan and master law enforcement plan – should not be in element	D
A	B			IS-P23 Level of Service Standards. Develop level-of-service standards to determine the impacts of new development to maintain Sheriff's Office services levels.	Covered under master law enforcement plan – should not be in element	D
A	B			IS-P23 Funding Sources. Establish sustainable funding sources to support adequate Sheriff's Office service levels.	Covered under master law enforcement plan – should not be in element	D
A	B			IS-P24 Planning and Community Design. Integrate safety and security measures in land use planning decisions to assist in crime prevention and quality of life enhancement through physical planning and community design.	Covered under master fire plan and master law enforcement plan – should not be in element	D

**Table 12-x. Plan Alternatives Comparison Chart:
Goals and Policies, Standards and Implementation Measures**

A	B	C	IS-G9 Adequate Fire Protection. Provide adequate fire protection for people, property, and communities.	Covered under master fire plan – should not be in element	D
A	B	C	IS-P26 Level of Service. Work with the Humboldt County Fire Chief's Association to develop appropriate level of service standards.	Covered under master fire plan– should not be in element	D
A	B		IS-P27 New Development Within District Boundaries. No new discretionary development resulting in structures intended for occupancy shall be approved unless the County finds that the proposed project is located within the boundaries of a fire related district, or the project approval is conditioned upon one of the following: A. If the project site is not located within the boundaries of a fire related district, approval shall be conditioned upon the annexation to an existing adjacent fire related district or annexation to a county service area established to provide fire protection services, and the establishment of an appropriate funding mechanisms to ensure that the district has adequate capacity to provide services, B. If the project site is not located within the boundaries of a fire related district and condition A is not feasible, approval shall be conditioned upon the establishment of an adequate ongoing funding source and the execution of a fire protection agreement with a local fire service provider, subject to approval by LAFCo.	Covered under master fire plan and master law enforcement plan – should not be in element	D
A	B		IS-P28 Development Review. Coordinate with fire protection service providers in the review of new development applications to ensure that fire protection facilities necessitated by new development are constructed through exactions or funded through fees, or other appropriate assessments on new development.	Covered under master fire plan– should not be in element	D
A	B	C	IS-P29 District Boundaries. Encourage the Humboldt LAFCo and fire service providers to adjust district boundaries to eliminate service area gaps and, where	Covered under master fire plan– should not be in element	D

**Table 12-x. Plan Alternatives Comparison Chart:
Goals and Policies, Standards and Implementation Measures**

			appropriate, consolidate districts for greater efficiency.		
A	B	C	IS-P30 Expanded Fire Protection Services. Encourage the expansion of existing, or the establishment of new fire related special district boundaries, as a means to provide fire protection services to unprotected and under-protected areas of Humboldt County.	Covered under master fire plan– should not be in element	D
A	B	C	IS-P31 County Service Area. Where existing fire related districts cannot feasibly be expanded or new districts feasibly established to serve existing or proposed development, establish a County Service Area and adequate ongoing funding source and the execution of a fire protection agreement with a local fire service provider.	Covered under master fire plan– should not be in element	D
A	B	C	IS-P32 Ongoing Funding Sources. Support the efforts of fire related districts to establish and maintain funding sources such as impact fees, special taxes, and special assessments to support adequate infrastructure and services standards as well as to improve fire protection service levels.	Covered under master fire plan and master law enforcement plan – should not be in element	D
A	B	C	IS-P33 Pooling Costs. Support the establishment of funding and resource pools to reduce administrative and operational costs of local fire service providers including items such as insurance, purchasing, and vehicle maintenance.	Covered under master fire plan– should not be in element	D
A	B	C	IS-P34 Countywide Coordination. Support the ongoing communication and coordination between local fire service providers.	Covered under master fire plan– should not be in element	D
A	B		IS-G10 Water and Wastewater System Standards. Assure safe, functional, effective, water and wastewater systems that ensures high-quality service, and protection of the people and resources of the County		R
A	B		IS-G11 Sustainable Capital Facility Financing. Assure sustainable revenue sources that protect service provider investment in capital facilities through adequately funded water and wastewater		R

**Table 12-x. Plan Alternatives Comparison Chart:
Goals and Policies, Standards and Implementation Measures**

			system maintenance and improvement activities.		
A	B		IS-G12 Interagency Cooperation. To provide coordinated planning among County/cities/service districts/federal and state water resource agencies for system design, development, operations and maintenance to ensure efficient, timely and equitable operation and maintenance.		R
A	B		IS-P35 Water Resource Assessment. Encourage and support more research and evaluation of the County's water resources by Federal, State and local water resources agencies.		R
A	B		IS-P36 Water and Wastewater System Capital Improvement Planning. Support the development and regular update of capital improvement programs for water and wastewater service providers that preserve, enhance and prioritize investments in the construction, operation and maintenance of the water and wastewater systems.		R
A	B		IS-P37 Water and Wastewater Capacity. Regulate the density and timing of new development consistent with water and wastewater system capacity. The County shall coordinate with special districts to maintain data on water and wastewater facility capacity.		R
A	B		IS-P38 Funding Sources and Mechanisms. Support the development and update of long-term, secure, sufficient, timely and equitable funding sources and mechanisms for water and wastewater system operation, including user fees, ongoing assessments and grant funding for service providers where appropriate.		R
A	B		IS-P39 Development Review. Coordinate with Support water and wastewater service providers in the review of new development applications to ensure that infrastructure upgrades necessitated by new development are in place and constructed through exactions or funded through fees, or other		M

**Table 12-x. Plan Alternatives Comparison Chart:
Goals and Policies, Standards and Implementation Measures**

				appropriate funding sources relating to new development.		
A	B	C		IS-P40 Service Commitment for Proposed Development Project. The County shall require that projects requiring public water and wastewater service receive commitments from the appropriate district or agency prior to receiving tentative approval from the County.		R
A	B			IS-P41 On-Site Sewage Disposal Requirements. Update the regulations governing on-site sewage disposal systems to protect health and safety and to reflect changes in State law and advances in treatment technologies.		R
A	B			IS-P42 Interagency Coordination/Integration. Encourage coordination among water and wastewater service providers through the integration and shared use of standards and capital improvement planning.		R
A	B			IS-P43 Coordinated Agency Activities. Work with other regulators and service providers ((e.g. service districts, city public works departments, Regional Water Quality Control Board, and the California Department of Health Services, etc) to coordinate water and wastewater system design, development, operations activities and maintenance where such coordination will result in greater operational and economic efficiency for the overall system.		R
A	B			IS-P44 Influencing State Regulations: Support the actions of local water and wastewater service providers to enact or prevent legislation or state regulations that could impact the ability of the County and surrounding service providers to meet General Plan goals.		R
A	B			IS-G13 Broad Range of Parks and Recreation Services. Provide a full range of parks and recreation services available to meet community needs.	Move to Open Space Element	

**Table 12-x. Plan Alternatives Comparison Chart:
Goals and Policies, Standards and Implementation Measures**

A	B			IS-P45 Local Parks and Recreation. Encourage special districts to provide local parks and recreation services in Humboldt County communities.	Move to Open Space Element	
A	B			IS-P46 Parks and Recreation Service Providers. Ensure that adequate parks and recreation service are provided by encouraging existing districts providing such services to expand their district boundaries to include adjacent urban areas and/or encouraging existing special districts serving urban areas to seek LAFCo approval to provide parks and recreation services.	Move to Open Space Element	
A	B			IS-P47 Parks and Recreation Funding. Support the efforts of parks and recreation service providers to establish and maintain adequate sources of funding for such services through user fees, special taxes and assessments.	Move to Open Space Element	
A	B	C		IS-P48 Joint Use Facilities. Encourage the utilization of schools, especially in rural areas, as community centers for activities such as public meetings, continuing education, recreation, and cultural events. Joint public-private development of recreation facilities shall be encouraged.	Move to Open Space Element	
A	B			IS-P49 Dedication or In-lieu Fee Requirements. Humboldt County shall require all new residential development to offer to dedicate land or pay a park fee for public parks sufficient to achieve the above <u>park standards contained in the General Plan.*</u> (MCP 4322.2)	Move to Open Space Element	
A	B			IS-P50 Parkland Dedication. As new development is approved, the goal of this Plan is to ensure that the combined amount of Humboldt County and local park land provided by a special district authorized to provide parks and recreation services meet the following <u>minimum criteria standards</u> : A. Community park land at 3 acres per 1,000 population. B. Neighborhood and mini park/tot lots at 2 acres per 1,000 population (MCP 4322.1).	Move to Open Space Element	

**Table 12-x. Plan Alternatives Comparison Chart:
Goals and Policies, Standards and Implementation Measures**

A	B			IS-P51 Parkland Terrain. The terrain of park sites should be suitable to accommodate both active and passive recreational activities.* (ECP 4420.3)	Move to Open Space Element	
A	B			IS-P52 Park Location. Parks should be located and sized and should contain appropriate facilities to serve both the existing and projected population within each service radius.* (ECP 4420.4)	Move to Open Space Element	
A	B			IS-P53 Services Available to Parks. Park sites should be provided with adequate water supply, sewer, police law enforcement and fire protection services, and should be accessible by foot, bicycle, and automobile. (ECP 4420.4)	Move to Open Space Element	
A	B			IS-P54 Locate Parks in Residential Areas. Neighborhood and community park and recreation facilities should, to the extent possible, be located in predominantly residential areas.* (ECP 4420.5)	Move to Open Space Element	
A	B			IS-P55 Park Dedications Held in Perpetuity. To the extent possible, all parklands should be dedicated and held inviolate in perpetuity, protected by law against diversion to non- recreational purposes and against invasion by inappropriate uses.* (ECP 4420.6)	Move to Open Space Element	
				IS-P56 Private Parks. The development of private sector recreation facilities shall be encouraged in addition to the above, but shall not substitute for them.* (MCP 4322.4)	Move to Open Space Element	
A	B	C	D	IS-P56 Private Parks. The development of private sector recreation facilities shall be encouraged in addition to the above, but shall not substitute for them.* (MCP 4322.4)	Move to Open Space Element	
A	B	C		IS-G14 Public Safety. Utilize Consider utilizing properly located and adequately maintained street lighting services to protect community health and safety.		M
A	B			IS-P57 Improve Public Safety. Encourage the provision of street lighting services as a means to improve public safety and the nighttime travel.		R

**Table 12-x. Plan Alternatives Comparison Chart:
Goals and Policies, Standards and Implementation Measures**

A	B			IS-P58 Street Lighting Service Providers. Ensure Consider ensuring that adequate street lighting service are provided by expanding the boundaries of existing street lighting districts and encouraging existing special districts serving urban areas to seek LAFCo approval to provide street lighting services.		M
A	B			IS-P59 Street Lighting Funding. Support the efforts of street lighting service providers to establish and maintain adequate sources of funding for such services such as direct charges, special taxes and assessments.		R
A	B	C		IS-P60 Street Lighting Design. Encourage the use of street lights that direct light to the proposed illumination area with the minimum impacts on surrounding areas and the night sky		R
A	B	C		IS-P61 Development of Telecommunications Infrastructure and Services. Encourage development of telecommunications infrastructure and services to facilitate the use of the best available technology for communications and business.		R
A	B	C		IS-P62 Telecommunications Facility Siting. The County shall adopt a telecommunications ordinance to Identify areas where future commercial or public telecommunications facilities can be located, while minimizing the proliferation of antennas.		R
A	B			IS-P63 County Library Facilities and Services. Continue to assess existing and future needs of the County's residents and expand library facilities and services as necessary to meet those needs.	Should not be part of General Plan	D
A	B			IS-P64 Library Funding Sources. Seek funding sources for public libraries including federal and state grants, and where appropriate, seek to establish new fees, special assessments, and special taxes.	Should not be part of General Plan	D
A	B	C	D	IS-P65 Joint Use Facilities. The County should encourage joint (shared) school		R

**Table 12-x. Plan Alternatives Comparison Chart:
Goals and Policies, Standards and Implementation Measures**

				facilities and educational programs between school districts and other public agencies.* (FWRK 4820.2)		
			D	School Facility Siting. The County should work closely with local educational institutions to study alternatives to new facility construction or facility siting.* (FWRK 4820.1)		R
A	B	C	D	IS-P66 Location of School Facilities-Hazards. School sites shall not be located in areas exposed to hazards.* (FWRK 4820.3)		R
A	B	C	D	IS-P67 Location of School Facilities-Parks. Encourage new school facilities to locate near public parks or recreational facilities.* (FWRK 4820.4)		R
A	B	C	D	IS-P68 Location of School Facilities-Services. School sites should be located in areas provided with public water and sewer services, or where adequate on-site systems can be established.* (FWRK 4820.5)		R
A	B	C	D	IS-P69 Conversion of School Facilities. Conversion of closed school sites and facilities to other uses should be consistent with existing or planned land uses of adjacent areas.* (FWRK 4820.6)		R
A	B	C	D	IS-P70 County Facilities. All future projects and facilities proposed by any agency of County government shall be reviewed for consistency with this General Plan or with applicable city General Plans.* (FWRK 4920.1)		R
A	B	C	D	IS-P71 County Facilities-Siting. County facilities should be sited and designed for present use and expected future expansion.* (FWRK 4920.2)		R
A	B	C	D	IS-P72 County Facilities-Accessibility. County facilities should be easily accessible and promote citizen use.* (FWRK 4920.3)		R
A	B			IS-P73 County Facilities-Funding. Require new development to pay its fair share of new mandatory County facilities to the extent reasonably possible recognizing funding limitations..		M

**Table 12-x. Plan Alternatives Comparison Chart:
Goals and Policies, Standards and Implementation Measures**

A	B	C	IS-P74 Utility System Capacity. Coordinate with utility service providers (electricity, gas, and telecommunications) to ensure that an appropriate range of services and adequate capacity is available for current and planned development.		R
<i>Alternative</i>			<i>Standards</i>	<i>Staff Remarks</i>	<i>Vote: R, D, M</i>
A	B		IS-S1 Adequate Public Infrastructure and Services Ordinance. New development shall comply with adequate public infrastructure and services standards. Adequate public infrastructure and services standards shall be used to determine the level of infrastructure and services to be provided by the applicants concurrent with the new development. Adequate public infrastructure and services standards shall be contained in an ordinance and based on the following: <ul style="list-style-type: none"> ▪ Levels of service standards contained in the General Plan; ▪ Response times established by the Sheriff's Office; ▪ Levels of service adopted by local service providers; ▪ Water, wastewater, fire, recreation and park related district boundaries, ▪ Insurance Service Office (ISO) Public Protection Classification Program ratings; and, ▪ Generally accepted levels of service. 		D
A	B		IS-S2 Safe Parks Designs. The design and location of parks shall include features to promote the security of park users, including the incorporation of "safewalk," "neighborhood watch," and community-based policing principles and techniques.	Move to Open Space Element	
A	B	C	IS-S2 Use of Parkland and Fees. The County shall develop a schedule for the use of land and fees collected under parkland dedication provisions, including mechanisms for tracking the expenditure of funds for a	If already part of existing framework, RETAIN , if not, DELETE	R/ D

**Table 12-x. Plan Alternatives Comparison Chart:
Goals and Policies, Standards and Implementation Measures**

			five-year period in coordination with special districts providing parks and recreation (i.e., develop a Memorandum of Agreement).		
A	B	C	IS-S4 Street Lighting. The standards of the local service provider; street lighting standards contained in the Humboldt County Highway Design Manual or those of the American Association of State Highway and Transportation Officials.		R
<i>Alternative</i>			<i>Implementation Measures</i>	<i>Staff Remarks</i>	<i>Vote: R, D, M</i>
A	B		IS-IM1 Adequate Public Infrastructure and Services Standards. Adopt an ordinance establishing adequate public infrastructure and services standards.	Use existing ordinance for water/sewer/roads implemented by Public Works	D
A	B		IS-IM2 Monitor Infrastructure and Services Capacity. Utilize wastewater treatment plant annual reports (pursuant to NPDES), water system annual inspection reports (as prepared by Department of Public Health Office of Drinking Water Safety) and close coordination with water and wastewater providers to monitor the capacities of infrastructure and services to ensure that growth does not exceed acceptable levels of service.	Already provided by Special Service Districts	D
A	B		IS-IM3 Mello Roos Community Facilities Districts/Special Assessment District Formation Procedures. Prepare local goals and policies concerning the use of the Mello Community Facilities Act of 1982 pursuant to Government Code Sections 55312.7 and 53345.8 and include special assessment district financing program policies, as appropriate.		R
A	B		IS-IM4 Comprehensive Development Impact/Fiscal Impact Study. Prepare and regularly update a comprehensive development impact/fiscal impact study that quantifies the relationship between new development and the need for additional public facilities and services.	This should be answered by the Winzler & Kelly Infrastructure Study Report	

**Table 12-x. Plan Alternatives Comparison Chart:
Goals and Policies, Standards and Implementation Measures**

A	B			IS- IM5 Impact Fees. Adopt an impact fee program based on the comprehensive development impact/fiscal impact study and other similar studies.	Citizen's Advisory Committee should be created and included for consideration in adoption of these.	M
A	B			IS-IM6 Roadway Infrastructure Impact Fees. The County shall determine off-site costs clearly and rationally connected to and resulting from new development as the basis for assessment of roadway infrastructure impact fees.	Citizen's Advisory Committee should be created and included for consideration in adoption of these.	M
A	B			IS-IM7 Other Roadway Funding Mechanisms. The County shall pursue other funding mechanisms to augment developer and/or mitigation fees to meet roadway improvement needs, including reimbursement agreements, debt financing, voter-approved taxes, and assessment districts.	Citizen's Advisory Committee should be created and included for consideration in adoption of these.	M
A	B			IS-IM8 Secure Roadway Funding Source. The County shall seek to establish a secure local funding source for roadway maintenance not otherwise funded under state and federal programs, such as a special tax, an increased sales tax, a transient occupancy tax, multi-purpose assessment districts, or other measures.		R
A	B	C		IS-IM9 State/Federal Roadway Legislation. The County shall actively support State and/or Federal legislation that generates funding, with growth potential, for transportation infrastructure and operations.		R
A	B	C		IS-IM10 Fire Protection Special Assessment Toolkit. Support the development of the Humboldt County Fire Chief's Association special assessment toolkit and provide additional support (such as assistance from the Planning Division, Public Works, Auditor-Controller or Assessor) to facilitate the development of new assessments and special taxes to fund fire protection services.	Covered under master fire plan – should not be in element	D

**Table 12-x. Plan Alternatives Comparison Chart:
Goals and Policies, Standards and Implementation Measures**

A	B	C			
				IS-IM11 Community Facilities Districts/Assessment Districts. Establish Mello Roos Community Facilities Districts or special assessments, as appropriate, in new development areas where current funding will not support adequate public infrastructure and services standards.	R
				IS-IM12 Fire Impact Fees. Support and promote the development of capital improvement programs by fire protection service providers that can be used to establish impact fees payable by all new development. Develop documents to facilitate the development of impact fees, such as a methodology for establishing fee amounts, uniform fire impact fee ordinance, agreement between fire related districts and the County, etc.	D Covered under master fire plan – should not be in element
				IS-IM13 Pooled Costs/Shared Resources for Special Districts. In consultation with the Humboldt County Fire Chief's Association, develop programs for special districts to reduce operating costs (similar to County Risk Management reducing district workman's compensation costs for fire protection districts).	D Covered under master fire plan – should not be in element
				IS-IM14 Fire Protection Level of Service. Support the development of level of service standards by the Humboldt County Fire Chief's Association.	D Covered under master fire plan – should not be in element
				IS-IM15 Standards of Fire Protection Response. Encourage Fire Districts to prepare and implement the results of standards of response coverage studies; these studies may include: establishment of baseline conditions, risk assessment, establishment of level of service standards and objectives, critical task capability assessment, reliability assessment, and policy recommendations.	D Covered under master fire plan – should not be in element
				IS-IM16 County Service Area. In close coordination with fire related districts, non-agency fire departments, and CAL FIRE, establish County Service Areas and adequate ongoing fire protection funding sources in	D Covered under master fire plan – should not be in element

**Table 12-x. Plan Alternatives Comparison Chart:
Goals and Policies, Standards and Implementation Measures**

				areas with developed and developable land that cannot be served by existing fire related districts and new districts cannot feasibly be established, and utilize fire protection service agreement with existing fire service providers, where appropriate. Utilize County Service Areas to augment the level of service and capacity of existing fire service providers, where appropriate.		
A	B	C		IS-IM17 Municipal Service Review. Support the preparation of a comprehensive countywide fire protection municipal service review by the Humboldt LAFCo to determine the best approaches to improve levels of service Countywide and expand service to areas outside existing fire related district boundaries.	Covered under master fire plan – should not be in element	D
A	B	C		IS-IM18 Sheriff's Office Funding Sources. Periodically assess the adequacy of existing Sheriff's Office funding sources by identifying; developing and maintaining sufficient resources to meet Sheriff's Office needs; including increased operational fees, development fees, new taxes, or special assessments.	Covered under master law enforcement plan – should not be in element	D
A	B	C		IS-IM19 Partner with the County "Community." Build the sheriff/community partnership by cooperating and collaborating with community and other governmental and service organizations on activities and programs, by recruiting officers skilled in community policing and the use of citizens in volunteer capacities, and by the solicitation of input on public satisfaction with Sheriff's Office activities.	Covered under master law enforcement plan – should not be in element	D
A	B			IS-IM20 Safe Communities Program. Create a Safe Communities Program involving the Sheriff's Office, Planning, and Public Works departments that strives to prevent crime and enhance the quality of life for County citizens through the implementation programs such as "Crime Prevention through Environmental Design"	Covered under master law enforcement plan – should not be in element	D

**Table 12-x. Plan Alternatives Comparison Chart:
Goals and Policies, Standards and Implementation Measures**

			<p>principles. These principles help facilitate both public safety and community building through:</p> <p>A. proper design and maintenance of the physical environment,</p> <p>B. bringing people together in the physical environment (community building), and</p> <p>C. long-term commitment to proper care of the physical environment.</p>		
A	B		<p>IS-IM21 Safety Audits and Community Building. Establish a Safe Communities Program to conduct safety audits on areas and neighborhoods in the County with rates of crime above county averages. An interdepartmental County team will work to update County development guidelines to foster the creation of safer physical environments. This interdepartmental team will consider how community design can foster a greater sense of community, as this has been positively associated with reductions in crime and an enhanced quality of life.</p>	<p>Covered under master law enforcement plan – should not be in element</p>	D
A	B		<p>IS-IM22 Storm Drainage Inventory/Master Plan/Capital Improvement Program. Develop a GIS based inventory of its storm drainage facilities that will include location, size, type and condition, and prepare a county-wide master plan that will focus on drainage for urban areas and include the development of a prioritized capital improvement plan. Utilize funding sources identified below to support this activity.</p>		R
A	B		<p>IS-IM23 Storm Drain Infrastructure Impact Fees. Establish impact fees with appropriate escalation clauses for new development for off-site costs clearly and rationally connected to and resulting from new development with adequate justification.</p>		M
A	B		<p>IS-IM24 Minimize Flood Risk. Construction standards and review procedures shall be updated to minimize risk,</p>	<p>Refer to Farm Bureau</p>	R

**Table 12-x. Plan Alternatives Comparison Chart:
Goals and Policies, Standards and Implementation Measures**

				and flood hazard regulations shall be updated to address the water quality impact of manure storage areas (ponds). (Humboldt County Code Zoning Regulations, Title III-Land Use & Development, Division 1-Planning)		
A	B			IS-IM25 Other Storm Drainage Funding Mechanisms. Establish other funding mechanisms, as appropriate, to augment developer and/or mitigation fees to construct and maintain storm drainage improvements, which may include reimbursement agreements, debt financing, voter-approved taxes, and assessment districts.		R
A	B	C		IS-IM26 State and Federal Storm Drainage Funding. Actively support and seek State and Federal funding, such as infrastructure banks, to improve and enhance storm drainage and flood control facilities.		R
A	B			IS-IM27 Organization of Water and Wastewater Providers. Assist in the establishment of an organization of local water agencies, such as an association or authority, to improve water quality, service capacity, and level of service of all water and wastewater services providers in Humboldt County.		R
A	B	C		IS-IM28 Sizing of Water and Wastewater Systems. Require the use of the County General Plan, and Zoning Code in determining the size and location of water and wastewater facilities, and the extent of services provided.	Beyond our scope - refer to CSD's	
A	B	C		IS-IM29 Coordination with Service Providers. Utilize referrals, "will serve" letters, and project review meetings, as appropriate, to coordinate with water and wastewater service providers and ensure that necessary infrastructure and planning is in place to support existing, planned, and proposed development.		R
A	B	C		IS-IM31 State/Federal Legislation. Support State and/or Federal legislation that generates funding for infrastructure. Track legislation and advocate or appose, as		R

**Table 12-x. Plan Alternatives Comparison Chart:
Goals and Policies, Standards and Implementation Measures**

				appropriate, new legislation that may benefit or adversely impact the County and its service providers.		
A	B	C		IS-IM31 Update On-Site Sewage Disposal Regulations. Update regulations that govern on-site wastewater systems to protect health and safety and reflect advances in treatment and disposal practices that have occurred since the last update.		R
A	B	C		IS-IM32 Telecommunications Facilities Ordinance. Prepare a Telecommunications Ordinance that: ensures compatibility of telecommunications facilities with nearby land uses; is proactive in the design and siting of wireless telecommunications facilities, and provides incentives for unobtrusive and compatible wireless antennas.		R
A	B			IS-IM33 Street Lighting. Prepare Consider preparing street lighting standards for new development that differentiate between urban and rural settings and that specify when street lights are required based on intersection type and functional classification as well as establish other street lighting criteria, and that specify improvement requirements and criteria for establishing Mello Roos Community Facilities Districts or special assessment to ensure adequate funding for operation and maintenance.		M
A	B			IS-IM34 Expand Lighting Districts. Require Propose that new urban development that meets threshold requirements established pursuant to IS-S15, Street Lighting, whether or not the project site is contiguous with current district boundaries, annex to the nearest street lighting district. Annexation proceedings are not subject to LAFCo authority and would be conducted by the Board of Supervisors.		M
A	B	C		IS-IM35 Parks and Recreation. Prepare parks and recreation standards for new development that differentiate between urban and rural settings, specify acreage of park land per 1,000 residents, and that specify land	Move to Open Space Element	

**Table 12-x. Plan Alternatives Comparison Chart:
Goals and Policies, Standards and Implementation Measures**

				dedication, in-lieu fee, or other mechanisms to make park and recreation improvements and criteria for establishing Mello Roos Community Facilities Districts or special assessment to ensure adequate funding for operation and maintenance.		
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