



**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

Re: Humboldt County General Plan Update  
Community Infrastructure and Services - Technical Report

Dear Commissioners:

General Comment

The Humboldt Association of REALTORS® has completed an initial review of this lengthy Technical Report and comments first that its size and detail has made it difficult to comprehensively review in the brief time period provided.

We can, at this point however, ask why some topics are included the report, for example; streetlights, 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 to the Technical Report 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.

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.

Comment on “Executive Summary”

Table ES-1

Two issues

1. Net Developable Land

This table is labeled “Summary of Infrastructure capacity limitations within the County”. The title should include the words “and land use density limitations”. The addition is suggested because land use density is included in the table (under “Description of limitations”) and we have concerns with these densities. There is still the issue, as we have expressed previously, regarding accuracy of net developable land (identified in the report effectively as land use densities) assumed by the County. The report discusses determining factors in the development of this table – water/sewer capacity or land use densities (LUD). The LUD (development potential) is determined after adjusting for physical constraints on the land. It is our belief that we have effectively returned to a previous issue, i.e. the previous Northern California Association of Home Builders and Humboldt Association of REALTORS® point about ignoring other factors such as market/economic/owner constraints which also effect land use density/land developability (see April 18, 2007 letter attached):

- The projected development potential estimates appear to be based on the same data as with the ground truthing exercise of five years ago. The County does not appear to have amended the land use maps as per that experience.
- Critical considerations (multiple owners, long term land investment, lack of capital and other market related issues) are still not included as constraints thereby rendering development potential estimates suspect.
- Economic difficulties encountered while trying to develop housing means some projects will never materialize. Disregarding this market reality again, in this report, renders projections unrealistic.

2. Road Limitations

Road constraints, their condition and carrying capacity, do not appear to be

included in calculating land use densities/development potentials in this table. This constraint is a critical factor when making these calculations. We suggest that if road limitations are not considered then a basic piece of infrastructure information is missing from the picture. Roads need to be given more attention.

The net developable land and road constraints issues lead to the LUD/development potential. The LUD numbers are important. Of the 42 urban study areas listed in Table ES-1, 22 or one-half have a development-controlling factor dictated by the LUD rather than any infrastructure limitation. And the three significant future growth areas, McKinleyville, Fieldbrook/Glendale and south Eureka, are all most restricted by their respective LUD. The accuracy of the LUD therefore is critical when determining where future housing will occur. We still have major concerns as to that accuracy.

#### Comment on "Introduction"

##### Development Projections - Section 1.3.1.

The concerns regarding the LUD numbers discussed above apply here again. Our concern continues with the report's housing development projections. The report assumes the County's calculation of "net developable acreage" is accurate and the report proceeds to use this data as basic underlying data. We still suggest those numbers are not accurate. The use of inaccurate data tends to undermine the strength of the report, specifically, the inaccuracy leads to an unrealistic estimate of how many housing units can be built over the life of this General Plan.

##### "Humboldt County Population and Housing Growth" - Section 1.3.2.

This section reports that since 1990, the production rate of housing construction has been faster than the population growth rate and that at the same time, the average size of households has been decreasing. Although not stated in the report, it could be construed from the discussion that the private market therefore has been positively responding to this demographic change. Housing production has been meeting housing demand as the demographics change to smaller households.

##### Population Growth Projections

The report states it is using the most current information possible, the July 2007 State Department of Finance (DOF) population numbers, to create a range of housing need projections. Per the report, the housing demand range (due to

population growth) will be from “somewhat lower” than historic rates (0.5% annualized housing demand) to “considerably higher” than past rates. This higher housing demand growth rate could be as high as 2.5% per year according to the report.

Although decreasing household size is taken into account, a problem could arise if this household size decreases faster than projected. If this were to happen, then the concern is that housing demand could outstrip land supply. The real question becomes whether use of the “upper end” of a 2.5% housing demand growth rate is enough to provide for a contingency in the event household sizes decrease even further than projected.

#### Comment on Implementation Chapter

As the Association has stated previously, this entire planning means little if there is no implementation. The report notes that there were several implementation recommendations made in the 1995 Eureka Community Plan for the south Eureka area. None of them have been executed. We urge the County to achieve a better record than this.

We understand that there are costs associated with implementation. The report identifies many sources of funding to meet these costs. Among them are development impact fees. These fees are typically built into the price of new housing and therefore increase the cost of new homes. This makes construction of affordable housing that much more difficult. We encourage the County to exhaust all other funding sources before exacting development impact fees.

#### Additional Comments

- There need to be common goals between the County, cities, communities and CSDs to successfully implement the General Plan.
- Only Urban Service Study Areas and Water Study Areas are discussed in this report. We suggest that scope is too limited. Future housing supply will also include rural homes built using private wells and septic systems. These should be included in the discussion.
- The Association does not support any form of down zoning but we do question the County’s interpretation of the state law regarding median point density.
- The Humboldt Hill and Myrtle Avenue area numbers/costs for infrastructure repairs are not included in the report. These are two of

the future growth areas and the absence of their cost estimates renders the overall infrastructure estimate of \$250 million dollars incomplete.

- This report was prepared with a limited scope and limited funds and therefore has produced limited results.

Closing Comment

County staff set a January 1, 2008 deadline on public comment for this Infrastructure Technical Report. Because of its length, we request at least an additional two months be given to allow for adequate public review. Please note that "public" here includes the various community service districts (CSDs). It is our belief they especially need additional time in order to complete a thorough review. We also suggest that the County consider stopping the update process until the CSDs have responded to this technical report and that we have a more comprehensive review of road conditions. The state of the infrastructure impacts all the other General Plan elements and therefore we cannot realistically go forward with the remainder of the update until we know fully the condition of the infrastructure.

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, Planning Director  
John Miller, Planner  
Neal Carnum, Winzler and Kelly  
Mike Knight, City of Eureka  
Don Lovett, HCSD  
Tom Marking, MCSD  
Carol Rische, HBMWD

**Humboldt Association of Realtors®**

**Northern California Association of Home Builders**

April 18, 2007

Mr. Neal Carnum  
Winzler and Kelly Consulting Engineers  
633 Third Street  
Eureka, California 95501

Re: Humboldt County General Plan - Infrastructure Element

Dear Neal:

We appreciate being asked to participate in your General Plan work project and being invited to attend the CSD meetings. However, we are concerned with the direction the Infrastructure Element is heading. We would like to support an Infrastructure Element which is accurate and realistic. However, we see many problems with the project at this point.

Specifically:

1. County GIS maps

- a. The projected density ranges appear to be the same as with the previous ground truthing exercise of four years ago. The county does not appear to have amended the maps as per that experience.
- b. Critical considerations (multiple owners, long term land investment, lack of capital and other market related issues) are not included as constraints thereby rendering density projections suspect.
- c. Economic difficulties encountered while trying to develop housing means some projects will never materialize. Disregarding this market reality again renders projections unrealistic.

2. We are very concerned with your comment at the April 5<sup>th</sup> CSD meeting that certain other constraints (road access, power availability, sewer availability, water availability, public safety and surface water run-off limitations) will be considered on a "limited" basis. These are critical constraints. For any density projections to be

considered legitimate, they must include these items on more than a "limited" basis.

3. We are concerned the Element is already slanted towards smart growth policies given your previous comment (Feb. 20) in support of smart growth.
4. We are concerned the Element is being based on information (County GIS maps) which is inaccurate. (See 1a – 1c above.)
5. We are concerned that the "size of the pipes", specifically the size of the sewer drains, as we understand HCSD and MCSD staff's respective descriptions, are not big enough to support the density ranges as projected by County staff.
6. The economic feasibility of major infrastructure projects (e.g. Martin's Slough project) is not being realistically considered. Adjustments in density projections do not appear to be accounted for if Martin's Slough is indefinitely delayed or fails to materialize altogether.
7. In the previous ground truthing exercise (2003), the County ended up abandoning the results (a statistical modifier) that was to be used in arriving at a net buildable land figure. Given this experience, what is the assurance of a more positive result with the current project?
8. We do not seem to have a definition of what is buildable or developable. These terms need to be defined before proceeding. It is difficult to spend time on this project without having a clear understanding of the goals. Each time we attend a meeting, the goals seem to get lost in the discussion.
9. We suggest there should be several levels to your work:
  - a. what is buildable now
  - b. what can easily be remedied to produce additional units
  - c. what the next logical expansion would be
  - d. what could be produced over the next 20 years
  - e. what need to be fixed over the next 50 year horizon

We feel that the present situation is the same as during the previous ground truthing exercise and that the County has not moved forward from its position from four years ago. We are back to the same problem as regards sensible portrayal of land availability and developability. Because the County is not considering a complete physical picture (numbers 2,4, 5, and 6 above) as well as not considering all market and economic constraints, unrealistic densities are being portrayed. This portrayal is leading to a false picture of how the County will meet its housing needs. If we cannot agree on what is buildable, then it is not at all clear our time working on this project is time well spent.


7Mr. Neal Carnum

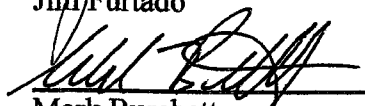
April 18, 2007

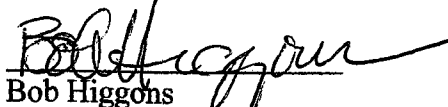
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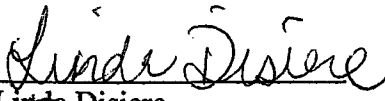
We request a meeting between the individuals listed below and yourself at your earliest convenience to discuss these issues. Please direct your response to Bob Higgons at 444-8737.


Thank you,

  
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Jim Furtado

  
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Mark Burchett

  
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Bob Higgons

  
\_\_\_\_\_  
Linda Disiere

  
\_\_\_\_\_  
Tina Christensen

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