



**HUMBOLDT ASSOCIATION OF REALTORS® INC.**

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PLANNING DIVISION

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

**Re: General Plan Update – General Comments**

**Dear Commissioners:**

The Humboldt Association of Realtors® would appreciate your review of the following comments on recent issues which have arisen during this General Plan update process.

**1. 200,000 Acres**

County staff has been purporting, in various public forums, that there is plenty of rural residential land by stating that there are 200,000 acres of such land available for large lot housing. We believe that this is a misleading statement as to what is actually buildable. It appears we have returned to the same problem we thought was resolved during earlier “net buildable land” discussions.

This was such an issue previously that the County conducted a study, “Housing Availability Report” (Feb. 2004), which recognized constraints on land use and suggested making adjustments in order to arrive at realistic net buildable land figures in the Eureka and McKinleyville areas. The adjustment figures were substantial. “For the sample set of...parcels studied, the sum of all constraints documented consisted of 62.1%...for Eureka and 59.0%...for McKinleyville.”<sup>(1)</sup> We suggest the results of this exercise should not be consigned to some vacuum of academic irrelevance, but that at least the concept of constraints adjustment should be applied universally.

Rural lands also have constraints. For example, it is not known if fire (SRA) rules restrict or prohibit construction, if there are streamside protection areas, if there are Coastal Zone restrictions, if there are Total Maximum Daily Load (TMDL) restrictions, if parcels will fall into a Land Trust removing them from inventory, we don't know if the land will “perc”, if there is

potable water and particularly if there are access (road) problems. We do not believe that all 200,000 acres are available for building. The true amount is unknown at this point. For the County to state that all Plan Alternatives "...will provide substantial additional rural residential opportunities..."<sup>(2)</sup> is irresponsible and misleading.

2. Public's Preference

During many of the General Plan meetings we have heard speakers referring to "what the public wants." If these speakers have in mind County surveys or voting exercises, we suggest there are problems with citing these as evidence of the "public's preference." Surveys can be slanted by which questions are asked and how the questions are framed. The "sticky-dot" exercises at the Red Lion meetings in late 2003 were an egregious example of this.

Another problem is sampling size. If, as just one example, these speakers have in mind the survey posted on the General Plan website under "Archive: General Plan Update Survey Results", we note that there were only 368 responses. This is a fractional sampling of the population. It is a skewering of common sense and an affront to the community for anyone to stand and say, based on limited and dubious surveys, that they are citing the "public's preference".

3. All Income Levels

One of the issues brought up at the April 19th Planning Commission meeting relates to who is to benefit from this General Plan update. Much of the public discussion seems to imply that the Plan update effort should expend its energy addressing the housing needs of the lower income segment of our population. Certainly it is not unreasonable to agree that there are other economic groups who also have housing needs. We will always support a General Plan which provides housing opportunities for *all* income levels.

4. Staff Bias?

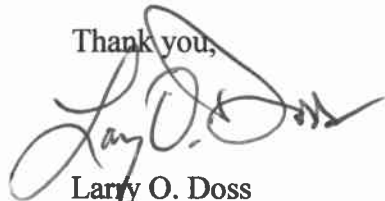
Also brought up at the April 19 meeting was the subject of how carefully planning staff is listening to public comments. Are they taking these comments into account or simply "putting them on the shelf"? Is the General Plan being driven by staff? Is the Plan's outcome predetermined by staff bias? We agree with the commissioners and the public who spoke about this that this bias has been evidenced in how staff has been taking notes at these meetings and that speakers' comments were not being reflected accurately. If such bias is in play, then we concur with the sentiment expressed at the meeting that the commissioners are wasting their time sitting in these meetings.

5. Informing the Public

As we go through this General Plan update process, we are concerned that the public is not fairly being informed nor advised of the possible end result. Informed that much of the proposed General Plan could lead to over regulation and advised that this could render achievement of affordable housing very difficult.

The Humboldt Association of Realtors® would appreciate your consideration of these comments and looks forward to continuing participation in the General Plan update.

Thank you,



Larry O. Doss  
2007 President



Ken Poletski  
Government Relations Chair

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

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(1) page 1, Executive Summary, "Housing Availability Report", Feb. 2004  
(2) staff report, April 19, 2007 Planning Commission meeting