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

RE: General Plan Update – Economic Development Element

Dear Commissioners:

I agree with the stance the Humboldt Association of Realtors has taken. See attachment.  
And I have the same question regarding what a vote means with revisions.

Sincerely,  
Michael L Newman

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MAY 21 2007

HUMBOLDT COUNTY  
PLANNING DIVISION

May 4, 2007

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

RE: General Plan Update – Economic Development Element

Dear Commissioners:

On May 17 the Planning Commission is scheduled to begin review of the "Economic Development Element" section of the General Plan. The Humboldt Association of Realtors® has reviewed the draft closely and would like to commend Planning staff on its attention to detail and informed discussion of important economic issues.

We support much of the draft language as presented. At the same time, there is language we suggest can be revised or deleted. We are submitting our comments with this letter and by way of utilizing the "Plan Alternatives Comparison Chart" (voting chart) provided by Planning staff on the County's General Plan website.

Our first comment focuses on the draft Element's reference to the Real Estate, finance and construction industries as "support industries." On the contrary, these industries are part of the foundation of the economy. These are the industries responsible for the buildings we work and live in. They also provide jobs for hundreds of people which in turn moves money into the local economy. Far from "support industries", they are critical to the functioning of a healthy economy.

For this reason we agree with staff comment on the problems created by regulatory policy. Such policy does have a "significant effect on the economy.

We agree that "permit timeframes...are out of step with the pace of business." A goal of this General Plan update should be to reduce problems associated with permit issuance.

Another issue identified in the draft Element is the creation of workforce housing. The Association has always supported creation of affordable housing.

There is no question that housing affordability and availability is intimately linked to economic vitality. If there is a lack of affordable housing, businesses have more difficulty recruiting workers.

Related to this is the state of the infrastructure. As discussed in the staff report, "the upgrading, expansion and construction of new water and wastewater facilities is necessary to build affordable housing and expand opportunities for businesses to grow." There is no argument about the connection between infrastructure and housing. As the Association has been consistently advocating, the condition of the infrastructure is of primary importance.

In addition to viable infrastructure, the availability of land zoned for industrial and commercial use is, of course, essential to a healthy economy. The General Plan must ensure an on-going supply of land where job and retail growth is likely to occur.

We would also like to comment on the format of the voting chart relating to the section entitled "Existing Framework Plan" (Plan Alternative D), pgs. 11-19 and 11-20. It is confusing as to how to vote in this section. Is an "R" ("Retain") vote a vote to retain the replacement language in the staff remarks or a vote to retain the original Framework language? How do you vote if you support modified replacement language?

We would appreciate your review and consideration of the Association's comments as noted on the attached voting chart.

We look forward to continued participation in this update process and to working with the County in producing an effective General Plan.

Thank you,

Larry O. Doss  
2007 President

Ken Poletski  
Government Relations Chair

Attachment (voting chart)

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

## 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 11-1. Plan Alternatives Comparison Chart</i>						
<i>Plan Alternative</i>			<i>Goals</i>	<i>Staff Remarks</i>	<i>Vote: R, D, M</i>	
	<b>B</b>	<b>C</b>		<b>ED-G1. Stable Economy.</b> 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	R
<b>A</b>				<b>ED-G1. Stable Economy.</b> To maintain a diverse, stable local economy with an emphasis on strengthening existing local industries.	Plan A alternative wording	D
<b>A</b>	<b>B</b>	<b>C</b>		<b>ED-G2. Broadband Internet.</b> 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.		R
<b>A</b>	<b>B</b>			<b>ED-G3. Quality of Life.</b> To attract and retain young talent by developing <b>housing choices ranging from large lot subdivisions</b> to vibrant town centers that incorporate a mix of employment, housing, and retail uses as well as access to child care, transportation, and cultural		M

				and natural amenities.		
	B	C		<b>ED-G4. Skilled and Ready Workforce.</b> 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.		R
	B	C		<b>ED-G5. Streamlining.</b> To implement permitting and licensing processes that are more responsive to the needs and timelines of the marketplace <b>for all applicants.</b> <del>particularly for microenterprises and home-based businesses.</del>		M
	B	C		<b>ED-G6. Transportation Networks.</b> To have transportation facilities that allow freight mobility along the interstate highway system and provide connectivity between residential neighborhoods and employment centers.		R
	B	C		<b>ED-G7. Public Water and Wastewater.</b> To have and maintain adequate public water and wastewater facilities <b>where feasible</b> to accommodate <del>workforce</del> <b>housing for all income levels including workforce housing</b> and provide opportunities for businesses to grow.		M
A	B			<b>ED-G.8 Natural Resource Assets.</b> To protect <b>the economic viability of productive agricultural, mineral resource, timber, and</b>		M

				coastal dependent lands.		
A	B			<b>ED-G9. Brownfields.</b> To clean up and reuse brownfield sites.		R
A	B			<b>ED-G10. Cooperation and Collaboration.</b> To build and maintain partnerships with cities, neighboring counties, and the private sector that build and enhance common assets and resolve common obstacles.		R
A	B			<b>ED-G11. Economic Development Assistance Programs.</b> To administer and support financial and technical assistance programs that support workers, businesses, and service providers.		R
A	B			<b>ED- G12. Informed Public.</b> To educate County residents of economic trends, emerging markets, innovations and opportunities for entrepreneurship that benefit the region's economic prosperity.		R
			<i>Plan Alternative</i>	<i>Development Policies</i>	<i>Staff Remarks</i>	<i>Vote: R, D, M</i>
A	B			<b>ED-P1. Prime Employment Industrial &amp; Commercial Land Protection.</b> Identify and protect prime employment industrial and commercial lands from conversion and encroachment of conflicting uses.		M
	B	C		<b>ED-P2. Airports Expansion.</b> Support expansion of the airports and to <del>include</del> facilitate service to major airport hubs and		M

				expanded flight schedules.		
A	B			<b>ED-P3. Broadband Internet.</b> Promote the provision of broadband infrastructure in all communities.		R
A	B			<b>ED-P4. Workforce Housing.</b> Promote the development of <del>workforce</del> housing for all income levels and mixed-use housing around multi-modal transportation options.		M
A	B			<b>ED-P5. Child Care.</b> Promote the provision of child care facilities within business, commercial and industrial centers and housing developments.		R
A	B			<b>ED-P6. Revitalization.</b> Promote the revitalization of underutilized lands in communities in transition due to the decline of resource-based industries.		R
A	B			<b>ED-P7. Brownfields.</b> Consider land use designations for brownfields to encourage cleanup and reuse.		R
A	B			<b>ED-P8. Commercial and Industrial Sites Database.</b> Maintain a commercial and industrial sites database and continue to improve accessibility to online information on commercial and industrial property.		R
A				<b>ED-P9. Commercial Retail.</b> Large format “big box” commercial uses shall not be located in the unincorporated area to avoid sprawl.	Plan A alternative wording	D

	<b>B</b>		<b>ED-P9. Commercial Retail.</b> Include standards for discretionary review of large format "big box" commercial uses to reduce their land use impact.	Plan B alternative wording	D
		<b>C</b>	<b>ED-P9. Commercial Retail.</b> Include standards for discretionary review of large format "big box" commercial uses.	Plan C alternative wording	R
	<b>B</b>		<b>ED-P10. Industrial Parks.</b> 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	R
<i>Plan Alternative</i>			<i>Investment Policies</i>	<i>Staff Remarks</i>	<i>Vote: R, D, M</i>
<b>A</b>	<b>B</b>		<b>ED-P11. Financial Resources.</b> Acquire grants and distribute financial resources for workforce training, economic research, infrastructure, and business development.		M
	<b>B</b>	<b>C</b>	<b>ED-P12. Freight Mobility.</b> Pursue financial and technical solutions to provide reliable interstate truck access on both U.S. 101 and State Highway 299.		R
	<b>B</b>	<b>C</b>	<b>ED-P13. Broadband Internet.</b> 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	See alternative wording below	R



				delivery of broadband Internet in the rural or remote communities in the county through all appropriate technologies.		
A				<b>ED-P13. Broadband Internet.</b> 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	D
A	B			<b>ED-P14. Workforce Housing.</b> 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.		M
A	B			<b>ED-P15. Public Infrastructure.</b> Pursue and distribute funding and technical assistance to upgrade and enhance the water and wastewater facilities of communities.		R
A	B			<b>ED-P16. Brownfields.</b> Pursue and distribute grant funding and technical assistance to assess, clean up, and reuse brownfields.		M
			<i>Plan Alternative</i>	<i>Partnership Policies</i>	<i>Staff Remarks</i>	<i>Vote: R, D, M</i>
A	B			<b>ED-P17. Job Growth.</b> Collaborate with economic development entities in the region to promote job growth, technical innovations, and entrepreneurship in base		R

				and emerging industries.		
A	B			<b>ED-P18. Workforce.</b> Work with the education and private sectors to promote education, vocational training, professional development, and lifelong learning.		R
A	B			<b>ED-P19. Cities and Counties.</b> Collaborate with cities and neighboring counties to identify and implement regional economic initiatives that benefit base and emerging industries.		R
A	B			<b>ED-P20. Child Care.</b> Foster private/public partnerships with child care service and information providers.		R
			<i>Plan Alternative</i>	<i>Implementation Measures</i>	<i>Staff Remarks</i>	<i>Vote: R, D, M</i>
A	B			<b>ED-IM1. Ordinances.</b> Update ordinances related to economic development for consistency with the uses of base and emerging industries. <b>Such updates not to be used retroactively.</b>		M
A	B			<b>ED-IM2. Commercial and Industrial Sites Database Mapping.</b> 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.		R
A	B			<b>ED-IM3. Broadband Deployment.</b> Revise subdivision regulations to <del>provide</del> encourage infrastructure for broadband		M

				internet within the development.		
A	B			<b>ED-IM4. Programs.</b> Support technical and financial assistance programs, including delivering capital, technical expertise, and training to businesses starting up and expanding.		R
	B	C		<b>ED-IM5. Streamlining.</b> Provide regular review and improvement of ordinances and permit processes to increase efficiency and reduce permit processing times. <del>for strategic targets such as, but not limited to, microenterprises, home based businesses, and workforce housing.</del>		M
A	B			<b>ED-IM6. Child Care.</b> <del>Investigate and</del> Support financing tools <del>that leverage public and private funding to</del> increase the establishment, rehabilitation, expansion, and viability of child care facilities.		M
A	B			<b>ED-IM7. Informed Public.</b> Conduct and publish <del>h</del> economic research relating to emerging markets, innovations, and opportunities in which the region may have competitive advantages <b>to attract new industry to Humboldt County.</b>		M
			<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	R

			<b>D</b> 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( <b>option b/c</b> ), P1( <b>modified</b> ) and P9 ( <b>delete</b> )	R
			<b>D</b> 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 ( <b>modified</b> ), P7, P9 ( <b>option c</b> ), IM1 ( <b>modified</b> ), and IM2	R
			<b>D</b> 4. Prevent the loss of designated industrial lands to other uses requiring permanent facilities.	Replaced by P1 ( <b>modified</b> )	R
			<b>D</b> 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 <b>D5 and P14 have nothing to do with each other</b>	R
			<b>D</b> 6. Allow Resource Dependent Industrial uses outside of urban areas when such uses are: <ul style="list-style-type: none"> <li>• dependent upon close proximity to resource production lands, and</li> <li>• not dependent on urban services.</li> </ul>		R
			<b>D</b> 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	R

			<b>D</b>	8. Locate commercial development in appropriate community centers that will assist and supplement existing commercial activity.	Replaced by P9 (option C)	R
			<b>D</b>	9. Discourage strip commercial development, where appropriate.		D
			<b>D</b>	10. Encourage the economic opportunities for production facilities that efficiently utilize all products and by-products of forestry, fishery, or agricultural uses.		R
			<b>D</b>	11. Maximize local energy opportunities from the renewable resources found in the County.		R
			<b>D</b>	12. Encourage innovative methods for pollution reduction and waste product disposal and utilization.		R



**HUMBOLDT ASSOCIATION OF REALTORS® INC.**

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P-15



May 14, 2007

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MAY 15 2007

HUMBOLDT COUNTY  
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