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W157

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 5th 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.

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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,

Jim Furtado

Linda Disiere

Mark Burchett

Tina Christensen

Bob Higgons

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