



**HUMBOLDT ASSOCIATION OF REALTORS® INC.**

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March 17, 2009

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Jeff Smith, Chairman  
Humboldt County Planning Commission  
Community Development Services Department  
3015 H Street  
Eureka, California 95501

Re: Draft Housing Element

Dear Chairman Smith and Commissioners:

The Humboldt Association of REALTORS® continues its review of the draft Housing Element and has also completed an initial review of the Draft Environmental Impact Report (DEIR). This letter is intended as a general comment letter and is not specifically a response to the DEIR, however, it does reference new information provided in the DEIR.

The emphasis on low income housing and Housing Opportunity Zones is certainly recognized as well intentioned attempts to address the issue of affordable housing. The county's emphasis comes in the form of incentives, deferred development costs, relaxed development standards and other considerations proposed for low income housing projects. However, it focuses the effort on only a portion of housing needs. The rest of the housing market is left on its own. Proposals being considered by the Planning Commission at this time are not addressing the affordability of market rate housing. The affordability issue reaches far into this market. The Affordability Index, which this Association publishes, currently stands at 21%.

Withholding the proposed subsidies, revised standards and regulations, as described in the DEIR, from housing located outside a Housing Opportunity Zone (HOZ) means non-HOZ housing will become still more expensive.<sup>1</sup> We understand that the intent of offering subsidies to HOZ housing, only, is a way of promoting infill. We generally support the concept of infill. But not everyone wants to live in a higher density HOZ. Is the Commission suggesting that in order for a person to live in a suburban/rural setting they must pay, effectively, what will become a government imposed premium? This seems unfair to those who choose this type of housing. Consider also that as the housing market outside HOZs become more expensive, fewer people will qualify for those homes. This will cast more people into the lower income housing categories forcing them to find housing in the HOZs where they may



not want to live. This, additionally, will have the effect of increasing demand in the HOZs which will cause prices to rise thereby decreasing affordability. The county's efforts may bring about unintended consequences.

We would appreciate consideration of the following comments on specific issues found either in the Housing Element or the DEIR.

#### New or Revised Development Standards

We support the following (as introduced in the DEIR) and advocate that they be considered for all housing and not just development within the proposed Housing Opportunity Zones:

1. 50% lot coverage. This is proposed as being allowed through the Conditional Use Permit process. It should be principally permitted.<sup>2</sup>
2. Modified solar shading. Allow this exemption without requiring the project to achieve a density of 1.5x the mid-point density.<sup>2</sup>
3. 3000 sq. ft. lots<sup>3</sup>
4. Tandem parking<sup>3</sup>
5. Lot splits for 2nd units<sup>4</sup>

#### Inclusionary Zoning

The details of inclusionary zoning as proposed in the DEIR still do not address the underlying problems regarding affordable housing. The Association continues to oppose inclusionary zoning as it will only compound the affordability issue.<sup>5</sup>

#### “Areas of Controversy”

Two of the “Areas of Controversy” described in the DEIR are of particular concern to the Association:

6. Land inventory. As the DEIR states “estimates of [land] development potential have been challenged.” The accuracy of the residential land inventory remains in question. This issue must be resolved with an accurate, “ground-truthed” inventory so that we know what land is actually available to meet future housing needs.<sup>6</sup>
7. Multi-family. It is recognized there is a lack of multifamily housing. However, the proposal to use commercial and industrial land for housing reduces business opportunity and consequently job creation. Any conversion of such land to residential use should be offset with a like amount of land rezoned elsewhere to commercial and industrial use. We advocate for a “no net loss” policy for commercial/industrial land.<sup>7</sup>

“Issues to be Resolved”

One of the listed “Issues to be Resolved” is of particular concern:

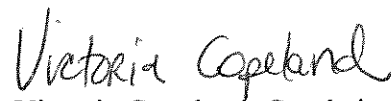
8. Regional Housing Needs Allocation (RHNA). As of this writing, the Humboldt County Association of Governments (HCAOG) has not produced the RHNA numbers. We do not understand how an update of the Housing Element and its associated EIR can be attempted without this information.<sup>8</sup>

Alternatives to the Proposed Action – Alternative C

9. Contrary to public perception that Alternative C will “cause” more housing, we agree with language stating “there would *not likely be a substantial difference* in the number of units developed under Alternative C” “Alternative C will also affect only the type and location of housing development, *not the number of units.*”<sup>9</sup> [italics added]
10. Generally we support Alternative C as it will not necessarily promote more housing but will *allow* more housing options. We disagree with the language stating Alternative C will “encourage more housing development in rural areas” if the intent is to suggest that Alternative C is growth inducing. A more appropriate word would be “allow” rather than “encourage”.<sup>9</sup>
11. We agree with the language describing Alternative C as relaxing “development standards more broadly” and interpret “more broadly” to mean county wide.<sup>9</sup>

We would appreciate your consideration of these comments as you continue your review of the Housing Element update. Please note that we will be submitting separate comments on the Draft Environmental Impact Report.

Sincerely,

  
Victoria Copeland, Co-chair  
General Plan Subcommittee

  
Debbie Provolt, Co-chair  
General Plan Subcommittee

cc: Kirk Girard, Director  
Michael Richardson, Planner

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|-----------------------|-----------------|
| 1. pgs. 17-28, DEIR   | 6. pg. 10, DEIR |
| 2. pg. 20, DEIR       | 7. pg. 37, “    |
| 3. pg. 80, “          | 8. pg. 10, “    |
| 4. pg. 19, “          | 9. pg. 37, “    |
| 5. pgs. 22 & 23, DEIR |                 |