



HUMBOLDT ASSOCIATION OF REALTORS® INC.

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January 7, 2010

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

Re: General Plan/Rural Residential Land Supply

Dear Chairman Smith and Commissioners:

This letter is submitted as a follow-up to the Humboldt Association of REALTORS® comments made at the December 10, 2009 Planning Commission meeting.

We agree with and support language from the November, 2008 General Plan draft regarding Rural Lands which states “[rural] lands provide the opportunity for rural homesteads that are a significant part of the cultural heritage of Humboldt County”.¹

The draft states that there are 1950 vacant parcels designated Rural Residential (RR)². At previous Planning Commission meetings there was discussion about whether this is an adequate supply. The Association suggests the supply issue must consider constraints on developability. The most accurate way to identify constraints is by “grounds truthing”. However, it has been described by planning staff that there has been no rural “grounds truthing”. We understand that would be difficult to do for such a large area.

At the November 11, 2009 meeting, several questions were asked about the nature of constraints that can restrict development on RR parcels. Among them is lack of road access. It appeared road access limitations have not been accounted for in the RR land inventory, again due to the inability of being able to “grounds truth” in remote areas.

During the meeting, Director Kirk Girard added that “most of the identified rural lots have road access, but the issue is whether or not the access would meet the Cal Fire standards for fire safety”. He said that “subdivision capacity may exist on paper, but plans for development might not be able to pass the

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Cal Fire review". We suggest this means that potentially, not all 1950 vacant parcels are buildable. Therefore, we advocate there should be a larger supply in order to arrive at a true net, buildable figure.

As the Director pointed out at the November 11 meeting, "a smaller supply of rural development parcels would result in higher prices and a larger supply would have the opposite effect", meaning lower prices. We agree with this description.

As you have heard the Association state many times, we are concerned with market rate housing affordability, including for this housing sector. A larger supply of rural residential land would increase affordability. When the Commission returns to the Rural Lands section, we urge that this be taken into consideration.

Sincerely,



Robert Higgons
Government Relations Coordinator

cc: Kirk Girard, Director CDS
Tom Hofweber, CDS
Martha Spencer, CDS
H.C. Board of Supervisors

1. pg. 4-23, Planning Commission Hearing Draft, Humboldt County General Plan, November 20, 2008.
2. *ibid*