



Humboldt County
Farm Bureau



Humboldt Del Norte
Cattlemen Association

REVISED
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Commissioner Jeff Smith, Chair
Humboldt County Planning Commission
3015 H Street
Eureka, CA 95501-4484

July 28, 2010

RE: Comments on Draft of Part 2, Chapter 5, Community Infrastructure and Services of the Humboldt County General Plan Update

Dear Chairman Smith and Commissioners,

We have conducted some review of Chapter 5 but have not generated a matrix of detailed comments. Our general comments follow. In summary, we have significant problems with the various proposals concerning levels of service, etc. as outlined below. We have reviewed the comments provided by the Humboldt County Association of Realtors. They appear to have similar concerns. We agree with their suggested deletions.

While conducting our review of the proposed policies and their related standards and implementation measures we considered separately the physical facilities (those for which Capital Improvement Programs are developed and for which specific physical standards may be used) and services (where there is not any consistency in an overall planning effort and standards of services are not developed (nor feasibly developable)). The provision of an adequate infrastructure, especially the physical facilities that are provided by the County and other agencies, is of high importance to the operation and management of our operations and daily lives.

The general tenor of the proposals seems to be that: the physical facilities and services of the County and some local agencies are not adequate; there is not enough money to make them adequate; and new development needs to pay its proportional share of everything in order to be allowed to proceed.

We have consistently supported the creation of Capital Improvement Programs wherein the physical facilities of the County and other local agencies may be considered and adopted/approved. This has included things such as: roads; drainage; water; wastewater and recreational facilities.

It is our understanding that the County has an assigned duty to review and approve or accept Capital Improvement Programs as outlined in the government code. This allows for the consideration of the proposed projects in light of an overall review of the General Plan. Further, it provides the opportunity to coordinate the efforts of the various special districts and cities with the Land Use and other planning policies of the County. We believe that these efforts should continue.

We applaud the County's efforts to assist in the coordination of fire services. However, we do not agree with the establishment of levels of service for various types of services throughout the County, especially those services under the jurisdiction of agencies other than the County (like the service districts).

We can see and have supported the County's highly important role in the location of the physical services within and around the Districts and cities. It is in recognition of this role that we support the use of mapped

Urban Limit Lines, or Urban Development Areas, etc. This tool has been very instrumental in the control of urban development and the protection of surrounding resource areas.

As it concerns specific types of services, the establishment of service levels for the Sheriff and the fire services are proposed. It is our understanding that the Sheriff, not the Board of Supervisors, makes the decisions as to the level of service, the assignment of personnel and the location of efforts. This duty is directly related to the amount of funding that the Sheriff's department receives through the Board of Supervisors (and other sources); however, the use of the officers is up to the discretion of the Sheriff (and within any state established minimum standards or requirements).

In addition, should the County embark upon the establishment of service levels for police services, we would be greatly concerned of the increased liability to the County (and the public) if the established levels are not met or maintained.

The same is so for the suggestion to establish levels of service for fire protection and related medical services. The County government is not a provider of fire services. These services are provided through the cities, the Fire Districts, the volunteers, and various state and federal agencies.

There are many fire agencies. Each of the Districts establishes its level of service, both type and level of effort based in large part on the revenues received by each (along with a lot of volunteer time). Most of the Fire Districts do not restrict themselves to the boundaries of their respective district. Going 'outside the district' appears to be done in the spirit of true public service and desire to help. We do not see how consistent service standards or truly fair 'proportional shares' could be adequately determined given these circumstances.

Again, should the County establish some sort of level of service in an area where it does not have jurisdiction, the very large possibility of increased liability to the County, the Districts and the public would seem to be created. The ability of the county to meet or maintain any level established, given the absence of adequate funding and jurisdiction, simply creates too much of a problem.

We do not agree with the proposal to require structural fire protection as a condition for getting a building permit outside established fire service areas. Individuals take on the risk as a part of the decision to own property and build outside of the Districts.

As always, we appreciate your consideration of our comments.

Sincerely,

Humboldt County Resource Lands Working Group
The Buckeye ~ Humboldt County Farm Bureau
Humboldt Del Norte Cattlemen Association ~ Large Timberland Owners Group
Forest Landowners of California (Humboldt Co. Representatives)

CC:

Planning Commissioners; Bruce Emad; Ralph Faust; Mary Gearheart; Denver Nelson; Mel Krebs; Dennis Mayo

Staff: Kirk Girard; Tom Hofweber; Martha Spencer