



**HUMBOLDT ASSOCIATION OF REALTORS® INC.**

527 W. Wabash Ave.  
Eureka, California 95501-2827  
(707) 442-2978 fax (707) 442-7985  
email: har@harealtors.com  
www.harealtors.com



RCUP  
8/12

August 12, 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/Circulation Element

Dear Chairman Smith and Commissioners,

The Humboldt Association of REALTORS® is presently reviewing the Circulation Element “Summary of Key Issues and Review of Alternatives” (“voting chart”) posted May 18, 2010. We have not yet completed our “voting chart” for your review, but we have preliminarily found a few, very important issues of concern to us. We would appreciate your consideration of the following comments.

Health impacts of the General Plan

Consider the language of policy **C-P8**: “Coordination Between County Agencies. Public Works, Health and Human Services, and Community Development Services departments shall coordinate with each other to encourage uniform implementation of circulation policies” and it’s associated implementation measure **C-IM6**: “Refer [certain] subdivisions...and [certain] discretionary permits...to the Environmental Health Division for review and comments on potential public health effects.”

“Public health effects” appears to refer to the “Health Impact Assessment of the General Plan Update Alternatives” (HIA) report presented August 2008 to the Board of Supervisors by Public Health Officer Ann Lindsey. The Association believes that the report, which seems to advocate that an urban setting is healthier than a rural setting, should not be used as a planning tool for Humboldt County. We comment here that it is nonsensical to imply a rural lifestyle is unhealthy.

Certainly we support healthy life styles, but point out that it is a matter of personal choice. Whether someone walks, bikes, drives or sits on the couch is their own decision, no matter what government attempts to legislate.

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Implementation measures such as C-IM6 can become overtly prescriptive regulation. Over regulation is one of the factors we believe drives up the cost of housing. The Association supports efforts to create all types of affordable housing. Towards that end we advocate for less regulation. In this HIA report, the Public Health Department appears to be advocating for more regulation.

We support choice and options in this General Plan. In this Circulation Element, Plan(s) A/B limit housing choices, which the Public Health Department does not appear to take into consideration. The Association advocates for the availability of a variety of housing types and for the rights of those who choose a healthy rural lifestyle over urban living.

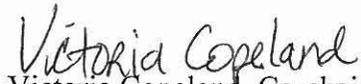
#### Aging infrastructure

We recommend that Circulation Element goals, policies, standards and implementation measures should be written which address the deteriorating roads and aging circulation infrastructure in the County. We have heard the Public Works Department cite there is some \$200 million in deferred road maintenance. It would be of interest to review an accounting of how maintenance funds have been spent over the past twenty years. Considering present road conditions, we suggest an assessment might reveal that in the past, more funding should have been dedicated to infrastructure upkeep. The Element should now address how to begin funding this deferred cost.

The Association advocates that the Planning Division work closely with Public Works on this Element *before* it is reviewed by the Commission. This will ensure that the Commission is fully informed on the condition of the infrastructure when it begins review of the Circulation Element. Towards that end, we recommend that you instruct staff to specifically address roads and other aging infrastructure in the Element. Additionally, we propose the County consider forming a Citizen's Advisory Committee charged with creating a work priority list. This Committee could also oversee the spending of Public Works maintenance funds to make sure they are not directed to unrelated projects.

The Association would appreciate your consideration of these issues and recommendations.

Sincerely,

  
Victoria Copeland, Co-chair  
General Plan Subcommittee

  
Debbie Provolt, Co-chair  
General Plan Subcommittee

cc: Kirk Girard, CDS Director  
Tom Hofweber, Supervising Planner  
Martha Spencer, Supervising Planner  
Tom Mattson, Director Public Works