



May 25, 2012

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Virginia Bass, Chair
Humboldt County Board of Supervisors
825 - 5th Street, Room 111
Eureka, California 95501

Re: A Morphing General Plan

Dear Chair Bass and Supervisors:

It has been Humboldt Association of Realtor®'s understanding that planning staff supported Alternative B for adoption as the County's General Plan.¹ Staff has changed that position and now supports the Planning Commission's March 19, 2012 recommended draft. Notwithstanding, the Commission's draft is not Alternative B. It is a draft which has morphed heavily into Alternative A.

A specific example of this morphing is cited from the Biological Resources chapter. At the March 24, 2011 meeting, while the Planning Commission was deliberating on this chapter, planner Tom Hofweber stated adoption of Alternative B or C would require a "Statement of Overriding Consideration". He said he "wanted to avoid" this. Use of a "Statement of Overriding Consideration" is not especially unusual and does not especially warrant avoidance. Nonetheless, Mr. Hofweber recommended adoption of Alternative A (even though this was contrary to Kirk Girard's statements on other occasions that staff was supporting Alternative B¹). In Mr. Hofweber's opinion, Alternative A would not require inclusion of a "Statement of Overriding Consideration".

This was accomplished, in some 65% of Chapter 10.3, Biological Resources, Goals, Policies, Standards etc., by staff combining Alternatives A and B together or combining Alternatives A, B and C together and presenting that to the Planning Commission. This meant the Commission had virtually no choices in Alternative language (in 65%± of Chapter 10.3). The Commission was not provided a range of alternatives as recommended by the state Office of Planning and Research guidelines. This is just one example.

Staff's support of the Planning Commission draft also appears to be contrary to the Board of Supervisors motion on September 13, 2004, "to identify the preferred alternative and the proposed project as sketch plan 'B'...." HAR is not aware of any Board change of this motion since then.



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The overall degree of an Alternative A General Plan was noted by planning staff at its April 19, 2012 presentation of the DEIR to the Planning Commission. At that time, planner Michael Richardson noted that "269 Policies, Standards and Implementation Measures are shared by Alternative A" and the Planning Commission draft.² This is "57% of the Project [the General Plan] total".² In other words, the Planning Commission is recommending a General Plan which is 57% Alternative A.

Virtually all of the Alternative A options translates into "no growth" policies. Alternative A directs new development into the "Urban Development Areas". However, limitations on sewer capacity, road inadequacies and other infrastructure constraints significantly reduce the buildable land inventory. The Association supports infill where feasible, however, most of the existing, built up areas cannot support new housing with these infrastructure limitations. Serious infrastructure problems, particularly sewer, could possibly lead to building moratorium scenarios in the future.

The Association encourages the Board to see the reality of what is being presented and to recognize the negative implications for housing and economic well being of the county.

Sincerely,



Victoria Copeland, Co-Chair
General Plan Subcommittee



Debbie Provolt, Co-Chair
General Plan Subcommittee

cc: Martha Spencer, Interim Planning Director
Philip Smith-Hanes, CAO

1. In the past, this has been stated or written multiple times by staff. Examples:
 - a. "Note: The Alternative 'B' version of policies...[are] considered a slate of recommended policies for the draft Plan" – staff report for 2/17/11 Planning Commission study session.
 - b. "Staff supports Plan B" – Director Kirk Girard, November 15, 2011 Land Use Maps Planning Commission meeting after HAR asked which Alternative staff was supporting.
 - c. "Alternative B (the proposed Alternative)" – these words appear five (5) times in the staff report for the January 5, 2012 Planning Commission meeting.
2. page 21 of hardcopy handout of April 19, 2012 planning staff slide show.