

Northern California Association of Home Builders

August 21, 2013

Sent via E-Mail

Ryan Sundberg, Chairperson, and
Humboldt County Board of Supervisors
825 Fifth Street
Eureka, California 95501

Subject: Chapter 4.8 Land Use Classifications for the Proposed General Plan

Dear Chair Sundberg and Members of the Board,

We are deeply concerned to see that staff has recommended that residences not be a principally permitted use in all classifications, but in some cases permitted only if “incidental” to the principal use, and in other cases not at all. We wonder which is incidental and who defines it? In its current form, this chapter is difficult to understand what uses are principally permitted versus conditionally permitted.

We are concerned about the several new classifications being proposed (e.g. RE, RR, MU, VC, UR, MC, MB, CF, CFR, NR, OS, PR, and MR). These affect many discussions yet to be had on outstanding sections of the plan. The new classifications also are affected by past deliberations on chapters and subjects the Board has already discussed; Infrastructure and Circulation to name two. Some of the densities and uses proposed may potentially affect future service and capital improvement and capacity plans of local community services districts and other services providers. Because of this the classifications may need to be changed before certification of the plan can happen.

When we compared the proposed new designations there seems to be inconsistency in the content with other chapters of the plan. We found terminology within the classifications to be without definitions.

It is troubling to see the level of detail in the classifications when there are no specific justification or general plan policies supporting the restrictions. We are concerned that proposed classifications should be either discretionary zoning designations or ministerial factual delineations (e.g. both of the conservation flood plain classifications CF and CFR . . . if a project is located in a mapped flood plain it is in a flood plain; there are mechanisms in place in the plan to accommodate such circumstances).

We feel that your review of the Land Use Classifications at this juncture in time is premature. We respectfully request you reserve discussion on Land Use Classifications until all of the chapters have been heard to have a thorough understanding of the application of the proposed classifications. Thank you again for your consideration of our comments.

For the NCHB,

Julie Williams

Advocate

cc: Supervisor Rex Bohn, District 1
Supervisor Mark Lovelace, District 3
Phillip Smith-Hanes, CAO
Kathy Hayes, Clerk of the Board
Supervisor Estelle Fennell, District 2
Supervisor Virginia Bass, District 4
Kevin Hamblin, Planning Department Director