

New info



November 16, 2015

Supervisors
County of Humboldt
825 5th St
Eureka, CA 95501

RE: General Plan Consistency Review

Dear Chair Fennell and Members of the Board,

Humboldt Association of Realtors® wishes to express our gratitude for the opportunity to participate in the formulation of Humboldt County's General Plan update. HAR is appreciative of the hard work that County Supervisors and Staff have devoted to preparing a strong and complete document for the betterment of our County.

However, a comprehensive review was compiled by HumCPR. This consistency review, was provided to County Planning Staff, that clearly outlines concerns shared by Humboldt Association of Realtors® with regard to policies that we feel will hinder the completion of a fair and balanced General Plan that is beneficial to the entire County.

It is our concern that in staff's response to the consistency comments provided by HumCPR that many of the more serious issues were not considered or not given the due diligence they deserve. There are a number of specific that Humboldt Association of Realtors® feels are of extreme importance for reconsideration: The Housing Opportunity Zones and Mid-Point Densities.

Response to Comment 6: The Housing Element includes maps for Housing Opportunity Zones in areas with public water and sewer services, and includes policies encouraging housing production in these areas. The above-referenced policies, standards and implementation measures similarly encourage housing and commercial development in areas with public services, so they may be considered to be consistent with the Housing Element.

Response to Comment 15: Policy FR-P11, *Lot Line Adjustments*, identifies the criteria for approval of lot line adjustments on parcels zoned TPZ. The state law referenced in the above comment requires lot line adjustments be consistent with the General Plan, so establishing criteria for approval of lot line adjustments in the General Plan would seem to be consistent with state law on this matter.

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H-S2. Achieving the Target Densities in Humboldt County Housing Opportunity Zones.

Response to Comments 20 - 29: All these comments relate to the consistency of the Housing Element to state law. That Element was approved and certified by the state in 2014. These consistency review concerns would have been addressed at the time that Element was adopted, so they are not part of this consistency review.

At its discretion, the Board could direct staff to articulate more comprehensive responses to comments #20-29.

Staff states in their response to Comments 20-29 (page 22 of the packet) that: "At its discretion, the Board could direct staff to articulate more comprehensive responses to comments #20-29." Humboldt Association of Realtors strongly implores the Board to do so. The responses currently provided by staff are unacceptable in that they provide no basis for a lack of consideration of the issues raised. Of particular concern are policies which limit development and the choice of Humboldt County citizens to live where they see fit.

Humboldt Association of Realtors reminds the Board that at this point in the process all items of all elements are eligible to be reconsidered and/or altered and that failure to adequately address concerns regarding major issues may lead to serious complications and delays in the passage of the Plan Update. It is not within the purview of County Planning staff to decide which items are worthy of review, reconsideration, or implementation.

We request that the Board of Supervisors reviews the materials provided by HumCPR, particularly as they relate to housing opportunity zones and mid-point densities and direct staff to evaluate and respond to the policies in such a way that clearly demonstrates the reasoning behind the staff's judgments on the policies in the plan and the ways in which they are consistent throughout the scope of the entire General Plan.

Respectfully,

Tina Christensen
GPU Committee Member
Humboldt Association of Realtors

cc: Supervisor Rex Bohn, District 1
Supervisor Mark Lovelace, District 3

Phillip Smith-Hanes, CAO

Kathy Hayes, Clerk of the Board

Jeffrey Blanck, County Counsel

Supervisor Ryan Sundberg, District 5
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