



October 14, 2014

Rex Bohn, Chairman  
Humboldt County Board of Supervisors  
825 Fifth Street – Room 111

RE: General Plan Update – Conservation & Open Space Element  
Scenic Resources – Chapter 10.7

Dear Chair Bohn and Supervisors:

The Humboldt Association of Realtors® is submitting our comments on the Conservation & Open Space Scenic Resources Chapter 10.7. We would like to speak to the following items: SR-G2, SR-Gx, SR-P1, SR-P2, SR-P4, SR-P5, SR-S1, SR-S2, SR-S3, SR-S4, SR-S5, SR-SX, SR-IM1, SR-IM2. These are the written comments in regards to each item we would like to comment on:

In reference to “Community Separators”, please note the following specific comments:

**10.7.3 – Goals & Policies**

**SR-G2:** HAR strongly feels SR-G should be deleted due to over regulation. The narrative of this chapter states that much of the scenic resources in the county (e.g. timberland, agricultural lands, and coastal areas) are already restricted or protected. In the case of timberlands, state laws governing timber harvest regulations significantly narrow the scope of scenic protection measures in the county. Scenic protection of agricultural lands is accomplished by policies in the Land Use Element. Many coastal areas are already protected by design review requirements. Additional regulation, as proposed in this chapter, again, leads to an over-regulated environment which hampers production of affordable housing and dampens economic opportunities.

The narrative portion of *Community Separators*, shown below, also seems contradictory to many land use ideas in the rest of the General Plan update, which focuses development using existing infrastructure.

***“Community Separators”***

Maintaining a visible separation between communities enhances a sense of community identity. Open space areas can serve as community separators, helping to

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avoid the look of continuous corridor-style urbanization. These areas are frequently subject to pressure for development because they are close to developed areas and major roads. A set of goals, policies, and programs to retain community separators is presented in this section." Part3, chapter 10 Narrative.

**SR-Gx:** HAR supports removal of the word "Highways" as it is recognized that Cal-Trans is the lead agency for designating State scenic highways.

**SR-P1 & SR-P2:** HAR feels that decisions should not be made for mapped areas without actual maps in place. This Standard should be deleted or shelved until maps exist, so we all know what areas will be affected. Clear criteria and definitions of the terms Scenic and Heritage must be reviewed and vetted.

**SR-P4 & SR-P5:** These standards should be deleted due to the fact that associated goals should be removed. Similar ideas in other chapters have already been deleted, i.e., permanent conservation easements, etc.

#### **10.7.4 Standards**

**SR-S1 & SR-S2:** HAR feels that arbitrary decisions should not be made for mapped areas without actual maps in place.

**SR-S3:** Without approved maps, there is no way to determine which roadways are affected. The roadways cited in the narrative portion of this chapter will affect many private property owners along those roadways in the buffer area. There has been no vetting and opportunity for property owners to opt out. Letters should be sent to all property owners along scenic designations to allow for public comment. Many of the proposed standards will adversely affect private property rights, property values, and add to the cost of housing and other economic development.

For example, how much will the site development guidelines add to the cost of a project? Who determines what is "harmonious"? Who decides what is "unsightly"?

**SR-S4:** This should be deleted because corresponding goal should be deleted.

**SR-S5:** This should be deleted because the corresponding goal should be deleted, the subdivision process is already regulated.

**SR-SX:** This should be deleted as this is a land use division issue and should not be included in the Open Space & Conservation Element.

#### **10.7.5 – Implementation Measures**

**SR-IM1:** Delete, this seems like a backward approach. The definitions of Scenic & Heritage, and proposed affected geographical areas should be known prior to making the policies and standards that affect those areas.

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**SR-IM2:** This should be deleted because corresponding goal should be deleted.

We thank you for your consideration and look forward to our continued participation in the General Plan Update process.

Sincerely,



Victoria Copeland, Co-Chair  
General Plan Subcommittee



Debbie Provolt, Co-Chair  
General Plan Subcommittee

Enclosures

Cc: Kevin Hamblin, Planning Director  
Michael Richardson, Senior Planner