

Attachment 6

Public Comments

October 11, 2017

County of Humboldt
Planning and Building Department
Director John Ford
315 H Street
Eureka, CA 95501

RE: Comments on the County of Humboldt General Plan Land Use Mapping Changes

Dear Director Ford,

Thank you for the opportunity for the City of Arcata to provide comments on the proposed Land Use mapping changes for the County General Plan update.

We have three areas that we request land use mapping changes:

1. City owned timberland in the Jacoby Creek watershed. The City owns several parcels in Jacoby Creek that are not part of the City limits. They are all collectively managed as the public Jacoby Creek Forest (JCF) that totals approximately 1,346 acres of which 575 acres are part of the City limits (APN 404-121-039 & 404-121-034). We noticed on the proposed Land Use maps that some of the City unincorporated timberland parcels are proposed to be changed from Timber (T) to Pubic (P), which is fine with the City but we request that all of them be changed to (P) for consistency. Included is a map that shows the locations of the publicly owned timberland, which includes the following APNs: 404-051-037; 404-121-030; 404-121-025; 406-041-006; 404-071-004; 404-121-015; 404-121-016; 404-071-001; 404-061-002; 404-061-001; 404-081-002; 404-081-001; 404-151-013; 404-151-012. 40 acre parcel 404-051-037 is currently zoned RR (JCCP).

At some point the City will likely merge some of the substandard sized TPZ parcels on this list to a larger parcel configuration.

2. Adjacent to the City's Jacoby Creek Forest there are two areas proposed to be changed from (T) to (RA) and (RE). We now understand the proposed mapping changes of the parcels at the end of Jacoby Creek Road that border the City's rock quarry and JCF are a mapping error. We would like to emphasize that land use change for that area from T to RE2.5-5 would not be appropriate given the adjacent resource lands, high quality of the timberland, lack of potable water, and road access issues. The City holds a log hauling easement through that area as well and they are best suited for a (T) designation. On the Greenwood Heights side of the watershed and again adjacent to the City's JCF, there is another proposed change from T- RA10-20 (APNs 404-061-30; 404-071-003; 404-051-009) and RR5-20 to RA10-20 (APN 404-061-031). We recommend all of these parcels have a land use designation of (T).

3. On Foster Avenue (APN 505-151-006) there is a proposed change from MD to RE 2.5 on a parcel that borders the City's Ennes Park. Attached is a map that highlights this area. We are aware that the proposed change lowers the density but we are requesting that this parcel have a land use of AE for the following reasons:
- Designation as residential could, with time, encircle an area zoned AE including one parcel scheduled to have an Agricultural conservation easement, recorded as part of a development and annexation proposal called "Creekside Homes Development".
 - This parcel is also located in a mapped Western Greenbelt area. A draft Western Greenbelt Plan and resolution will be reviewed by the Arcata Planning Commission and City Council soon. We will notify the County of that process and forward all pertinent documents and maps. Keeping the parcel in AE would be consistent with the goals and intent of the greenbelt resolution and also with the City's General Plan policies including: *"Provide a greenbelt around the City's perimeter to: a) define the urban limit of Arcata; b) provide a physical separation between urban communities; c) protect important agricultural areas from urban uses and maintain agriculture as an economically viable activity"*

Thank you for your consideration of the City of Arcata's comments on the proposed Land Use mapping changes for the County General Plan update.

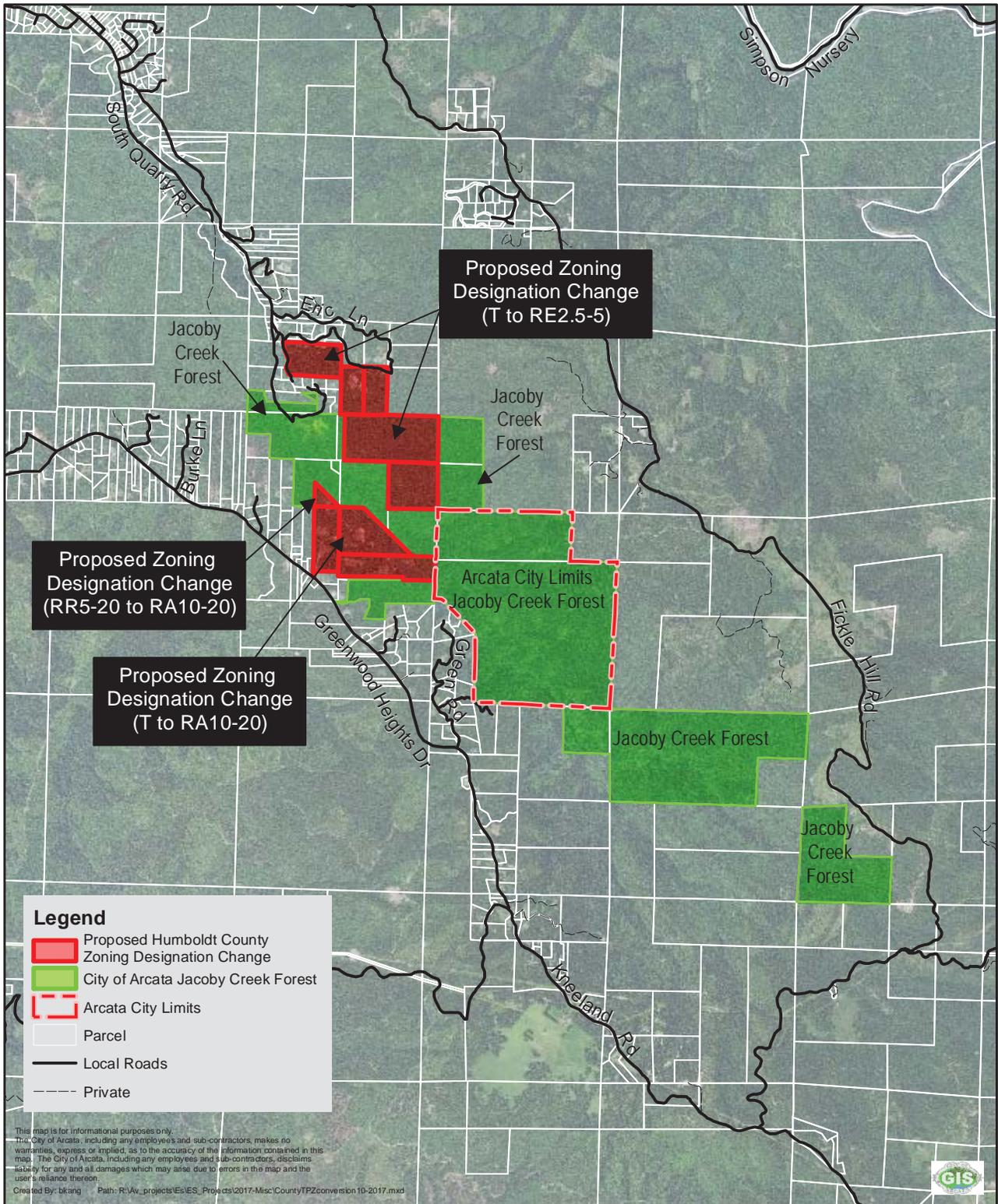
Sincerely,



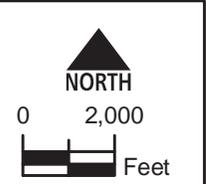
Mark Andre
Environmental Services Director
City of Arcata
736 F Street
Arcata, CA 95521

Attachment:

- Map showing proposed Land Use changes of concern in Jacoby Creek
- Map showing proposed Land Use changes of concern west of Arcata



**City of Arcata
Jacoby Creek Forest
10/3/2017**



From: Mark Andre [<mailto:mandre@cityofarcata.org>]

Sent: Thursday, October 12, 2017 3:27 PM

To: Ford, John; Wilson, Mike

Cc: Karen Diemer; David Loya

Subject: RE: City of Arcata Letter Re: Humboldt County General Plan land Use Mapping Changes

John and Mike

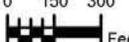
We forgot to mention in the letter sent to you yesterday... the parcel at 1706 Guintoli Ln. (APN 507-141-032) that has a proposed land Use Change from AE to CG.

It looks like the Alternative "D" County map has a portion within the City Urban Services and a City General Plan pre-zone that is consistent with the proposed County GP Land use. But, part of the parcel to the north on the County Alternative "D" that is proposed to be changed from AE to CG is outside the City USB and looks like viable agriculture land and Mad River riparian and is within the FEMA Zone AE Floodway. Therefore we would recommend the Land Use change to CG correspond to the area within the Urban Services Boundary.

Regards

Mark Andre



 <p>City of Arcata Environmental Services</p>		<p>NORTH</p> <p>0 150 300</p>  <p>Feet</p>
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Dear Humboldt County Board of Supervisors,

Redwoods Rural Health Center has served the Southern Humboldt and Northern Mendocino communities for 40 years. Since 1976 Redwoods Rural Health Center (RRHC) has provided responsive, preventive, high quality primary health care services, through a variety of healing disciplines to the rural and isolated communities in Southern Humboldt County. The health center exists to serve people of all ages regardless of social or economic status.

In 2015, RRHC served 5,380 patients. Approximately 57% of the health center's patients were living in poverty, 26% were uninsured, and 7% were Hispanic. RRHC's preventive services encompass immunizations, cancer screening, women's health, well child exams, diagnostic labs, dental care, counseling, physical therapy and acupuncture. In addition to primary care services, RRHC offers enabling services to address social determinants of health, such as transportation and food assistance, insurance eligibility, case management, telemedicine, patient self-management education and homeless outreach.

Recently we learned that the existing Residential Single Family plan and zoning designations that apply to our property prevent any expansion of the existing medical buildings. Therefore, we are requesting the Board change the land use designation on the General Plan Update land use maps for our property to Mixed Use to reflect the existing medical, dental & behavioral health office use. We also request a zoning change from Single Family Residential to Mixed Use to reflect our existing land use and to accommodate moderate expansion of our facility.

The Redwoods Rural Health Center patient population has increased dramatically because of the insurance options available through the Affordable Care Act. As a federally designated Community Health Center, Redwoods Rural is working hard to meet the increased need. We have hired and continue to hire new staff for medical, dental and behavioral health, but our facilities have not changed in 40 years. The zoning change would allow for our needed expansion and allow us to follow codes that are appropriate to our existing use.

Thank you for considering a zoning change from Single Family Residential to Mixed Use so that Redwoods Rural Health Center can continue to meet the community need far into the future.



Redway Community Services District
P.O. Box 40
Redway, CA 95560
(707) 923-3101

Estelle Fennel
Humboldt County Board of Supervisors
825 5th Street, Rm111
Eureka, CA 95501

November 15th, 2016

Dear Estelle,

The Board of Directors for Redway Community Services District (RCSD) has been reviewing the proposed land use designations in the GPU for Redway. If adopted these changes will considerably increase density on 71 parcels in the District. These parcels -- which are now "Commercial General"(CG) -- could see density increase to "16 dwelling units per acre" if a "Mixed Use"(MU) designation is approved. These changes create problems for our small district and the finite resources of our local environment. Water supplies, infrastructure and revenues for needed capital improvements are all in short supply.

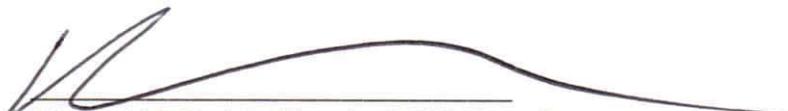
Unlike Northern Humboldt with its impressive water security, the South Fork of the Eel River, the source of water for RCSD, is an over-allocated river with low flows exacerbated by drought conditions. In the past several years it has been necessary to go to mandatory conservation requirements in our community. This need to reduce water consumption will likely become part of RCSD's Conservation Ordinance revision which is currently being drafted. Also of concern, is upstream development that may impact RCSD and the responsibilities the District has to downstream users.

In 2014, RCSD's engineers completed a capacity analysis for both the water and wastewater systems which indicated the District was at or near capacity in several areas. The Humboldt County Planning Department received a copy of this analysis in 2014. RCSD currently has a waiting list for new connections to the system. RCSD is working closely with its consultant to meet current demand and to develop strategies to increase future capacity where possible.

Redway is not alone in our predicament. All residents in the south of the county need watershed planning for which the county must provide leadership. We would appreciate your assistance in bringing RCSD's concerns regarding high density development in the Redway CSD service area to the full Board of Supervisors.

Please reconsider the magnitude of the increase in density proposed for Redway.

Thank you for your attention in this matter,



Michael McKaskle (For the RCSD Board)

From: Debbie Provolt [<mailto:DProvolt@hltco.com>]
Sent: Tuesday, October 10, 2017 11:17 AM
To: Ford, John; Bass, Virginia; Bohn, Rex; Fennell, Estelle; Sundberg, Ryan; Wilson, Mari
Cc: Tina Christensen (tinacutten@gmail.com); ecampbell@humboldtrealty.com; Sara Prendergast; Heather Bergen (heatherlbergen@gmail.com); Jeremy Stanfield; Humboldt Association of Realtors (ida@harealtors.com)
Subject: GPU issue

To all,

I am writing on behalf of the Humboldt Association of Realtors. We are putting our comments together, but this is an issue which we would like to start a discussion on early. You will all have a lot on your plate on October 23rd, and awareness of this issue in advance may be helpful.

Please review the 4 emails below. Michael has answered well, and I am not faulting or criticizing him, but the answer is not what we hoped for. Many of the Implementation measures will take 5 years. Our concern is how that will impact anyone trying to accomplish subdivisions and other projects during that 5 year period.

Thank you.

Debbie Provolt, Vice President

Title Operations Manager
1034 Sixth Street
Eureka, CA 95501
(707)443-0837
(707)445-5952 (fax)
dprovolt@hltco.com

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From: Richardson, Michael [<mailto:MRichardson@co.humboldt.ca.us>]
Sent: Friday, October 06, 2017 1:27 PM
To: Debbie Provolt
Subject: RE: Question for you

That's also a good question. My understanding is the way that planning law is set up, applicants are subject to the rules in effect at the time their permit is approved. However, the Permit Streamlining Act prevents us from asking for more information from applicants that have submitted complete applications. I'm not sure how are we supposed to approve projects under the new policies if we don't have evidence to support all the required findings under the new plan. I don't think it will be a problem for most projects because the Framework Plan and the GPU are similar in many ways, but I get the sense

there may be some projects that fit this scenario. I'm sure other jurisdictions have figured this out in an elegant way. We are developing alternatives for the Board to consider on this point.

- Michael R.
(707) 268-3723
mrichardson@co.humboldt.ca.us

From: Debbie Provolt [<mailto:DProvolt@hltco.com>]
Sent: Friday, October 06, 2017 1:04 PM
To: Richardson, Michael
Subject: RE: Question for you

So if someone were doing a subdivision now, would you apply the prior rules under the old GP? They would not have to wait would they?

Debbie Provolt, Vice President
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dprovolt@hltco.com

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From: Richardson, Michael [<mailto:MRichardson@co.humboldt.ca.us>]
Sent: Friday, October 06, 2017 12:56 PM
To: Debbie Provolt
Subject: RE: Question for you

Hi Debbie,

That's a great question!

There are implementation measures, like for instance UL-IM7 that calls for a comprehensive review and update of the zoning ordinance, that is going to take awhile, and there are policies, like UL-P8 that talk about new standards in the subdivision ordinance to promote circulation. I don't think we can implement that policy in a defensible way without the standards being articulated in the new ordinance, so this policy would become effective only after the new ordinance is adopted. There are other policies, however, that can be implemented upon adoption of the GPU such as GP-P6, even though they would also likely be incorporated into the subdivision regulations when they are adopted. Here's the specific language of the referenced implementation measure and policies:

“UL-IM7. Review and Update the Subdivision Ordinance. Comprehensively review and update the Subdivision Ordinance and incorporate circulation and design standards consistent with the policies of this Plan.”

“UL-P8. Neighborhood Connectivity. Subdivisions shall be designed to promote road and trail circulation between neighborhoods, schools, parks, and open space areas. The subdivision ordinance shall specify standards and limitations for cul-de-sacs, dead end roads, and block sizes.”

“GP-P6. Use of On-Site Sewage Systems within Urban Development Areas. The utilization of on-site sewage disposal systems shall not be acceptable for new subdivisions in the Urban Development Area, unless the Planning Commission makes specific factual findings that:

- A. The extension of services is physically infeasible; or,
- B. The area is not planned for service in the service provider’s Municipal Service Review and other written long-term plans; or,
- C. The services are not reasonably available in a timely manner. ”

If there are other particular instances you’re wondering about, I’m glad to discuss those further.

- Michael R.
(707) 268-3723
mrichardson@co.humboldt.ca.us

From: Debbie Provolt [<mailto:DProvolt@hltco.com>]
Sent: Thursday, October 05, 2017 1:46 PM
To: Richardson, Michael
Subject: Question for you

Michael,

Many of the Implementation Measures are expected to take 5 years to complete. If a person is doing something like a subdivision, and there are provisions of the General Plan which apply to the subdivision, for which the implementation measures have not been determined, how will that affect the subdivision, or other project?

Thanks

Debbie Provolt, Vice President
Title Operations Manager
1034 Sixth Street
Eureka, CA 95501
(707)443-0837
(707)445-5952 (fax)
dprovolt@hltco.com

Uri Driscoll
1578 Fickle Hill Rd
Arcata CA 95521

Humboldt County Board of Supervisors,

I have been informed that a request has been or is being made for the General Plan Update to include eliminating all discretionary permit requirements for removal of coastal vegetation. I oppose this action, and am submitting this recommendation for invasive plant management protocol on coastal dunes in Humboldt County.

Significant concerns have been brought forward regarding the removal of coastal vegetation. This activity has consistently shown to result in the alteration of landforms in the form of erosion, lateral spreading, and wetland infill, as well as other impacts associated with large scale non-native plant eradication programs.

While some botanical monitoring has been done since the start of these projects, geomorphic monitoring has been lacking (as is noted in the 2017 thesis submitted by Alana Rader during the Climate Ready project funded by the Coastal Conservancy). Other University studies from Oregon and Washington have raised concerns related to the alteration of dune topography and landforms following coastal dune plant removal.

It is important that these projects remain subject to the Coastal Development Permitting process, which is the only effective mechanism for the County to assure that sufficient monitoring and oversight is established and maintained. This is required by the EIR associated with the Humboldt Beach and Dunes Management Plan.

I oppose using the General Plan Update process to eliminate the established permit-process for invasive plant eradication efforts on coastal dunes. This would subject coastal dunes to a reduced level of coastal protection as noted in the university studies mentioned above. These protections are critical for maintaining community infrastructure and agriculture lands, as well as established wetlands and wildlife habitat. Altering Environmentally Sensitive Habitat Areas should always be done with the utmost care and monitoring. This would be only afforded through the permitting process.

Respectfully,

Uri Driscoll

10/9/2017