



**Agenda Item - H - Planning and Building Department - #1 25-263 - STR Ordinance Amendment
Trevor Goff - March 11, 2025 BOS Mtg.**

From Trevor Goff <trevorgoff@gmail.com>

Date Mon 3/10/2025 4:17 PM

To COB <COB@co.humboldt.ca.us>

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Hi All

I'm writing to provide public comment for the proposed amendment to the inland STR ordinance, Public Hearing item #1.

The original ordinance language was very clear that "The access road shall be built to a Category 3 standard." Category 3 standards are clearly defined in the Humboldt County Code and Humboldt County Roadway Design Standards Manual. The County approved a STR permit on Echo Ln. Bayside (private road) that was not built to a Category 3 standard as defined in the Humboldt County Code and Humboldt County Roadway Design Standards Manual. The County made this determination with no engineered analysis including no roadway capacity calculations. It is important for roadways to be accurately and correctly documented for this permit process as the determination has significant impacts to all responsible parties for private road maintenance. Incorrect roadway documentation could result in increased tort liability and maintenance expectations that are economically infeasible.

The proposed revision is much needed but misses the mark for several reasons. One reason is the general public and non-engineering County staff are unable to determine roadway capacity. Almost all applicants do not know how to calculate the capacity of a roadway to be able to determine if it is functionally equivalent to a Category 3 road. As stated above the County performed no capacity analysis for Echo Ln. Bayside (private road) and I doubt County staff will perform any capacity analysis for future STR permits.

An important distinction for a Category 3 road is for the ability for vehicles to be able to pass at low speeds. This requires two main roadway standards be met, traveled way width and sight distance. If there is inadequate traveled way width vehicles do not have the room to pass and if there is insufficient sight distance vehicles will not be able to pass without stopping. In the specific case of Echo Ln. Bayside (private road) there is non-standard traveled way width and insufficient sight distance for the roadway to function equivalent to a Category 3 road. A report prepared by a Professional Civil Engineer for Echo Ln. Bayside (private road) was submitted to the County documenting the deficiencies.

An improved revision to be considered is that the specific STR Permit access road has adequate capacity for the proposed STR use or function equivalent to a Category 2 road. An access road that operates at a functional equivalent to a Category 2 road would cover the majority of Humboldt County

roads both public and private. In the specific case of Echo Ln Bayside (private road) the roadway has adequate capacity for the STR currently approved but Echo Ln. is not built to a Category 3 standard nor has the capacity to function as an equivalent to a Category 3 road. It is important for roadways to be accurately and correctly documented.

A few questions that have gone unanswered by county staff are below for consideration.

The road standards are in the Health and Safety Standards portion of the ordinance. Why does the country not consider roadway standards directly applicable to health and safety? Considering capacity only would be more of a Neighborhood Quality issue.

Humboldt County requires new land use in the SRA to be built to a Category 3 standard and is well defined in the Humboldt County code. STR is a new land use in the majority of Humboldt County but this road standard is not required, why?

Thanks!

Trevor T. Goff, PE