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May 21, 2020

John Ford, Director
Humboldt County Planning and Building Department
3015 H Street
Eureka, California 95501

RE: Appeal of Denial of Allpoints Signs, Inc. Special Permit PLN 2019-16029; APNs 305-031-007; 305-031-008; and 305-031-009

Dear John:

My office has been retained by Mr. Geoff Wills and his company, Allpoints Signs, Inc., with respect to appealing the resolution of the Humboldt County Planning Commission ("Planning Commission") (Resolution No. 20-27) denying his application for a special permit for the reconstruction of a billboard structure.

My understanding is that Mr. Wills has filed an appeal application and has paid the appeal fees in compliance with County Code on May 20, 2020. I understand that you informed him that this would preserve his appeal rights to the Humboldt County Board of Supervisors concerning the Planning Commissions decision to deny him a special permit.

The basis of this appeal is that the Planning Commission abused its discretion in that the findings are not supported by the substantial evidence presented. In reviewing the staff report, I note that the Commission's findings explicitly contradict the evidence contained in that document. No reasonable person would make the findings the Planning Commission made in light of what was presented in the staff report and the public comment.

Specifically, Findings 2, 4, 5, 6, and 7 of Resolution No. 20-27 consider rules and regulations that either: (1) are inapplicable, have not been adopted, do not carry the force of law, or were not presented in the staff report or public comment; or (2) or are inconsistent with current zoning regulations in effect. Finding 7 refers specifically cites a rule of the Humboldt Bay Area Plan (HBAP) that refers to "new off-site signs." However, as I understand it, no new signage was being proposed in the application. Rather, the application was for maintenance of an existing sign facility. Furthermore, Finding 8 is in total contravention of what was described in the staff report, and no public comment that I can tell presented evidence to contradict what was contained in the staff report.

Having not been present at the hearing, I would request a copy of the transcript of the hearing for review in preparation of the appeal to the Board of Supervisors. Please carbon copy my office on any correspondence between your Department and the applicant concerning this appeal. If you have any questions regarding the above, please feel free to contact me at the phone number written below or via email.

Regards,

Jeffrey Slack