



*“ Jobs, Homes & Individual Rights ”*

November 25, 2009

Ms. Lynn Jacobs, Director  
California Department of Housing & Community Development  
1800 Third Street, Suite 430  
Sacramento, California 95814

Ms. Cathy Creswell, Deputy Director  
California Department of Housing & Community Development  
1800 Third Street, Suite 430  
Sacramento, California 95814

Mr. Paul McDougall, Program Manager  
California Department of Housing & Community Development  
1800 Third Street, Suite 430  
Sacramento, California 95814

Subject: Humboldt County Housing Element Land Inventory

Dear Lynn, Cathy & Paul:

Thank you for this opportunity to provide the following information regarding Humboldt County's Housing Element Land Inventory:

- 1 A one-page summary of the variances between the County's inventory versus that of the FOL team. (Attachment A)
- 2 Footnotes re: County's Inventory (Attachment B)
- 3 FOL comments on individual APNs as presented in the County's inventory. (Attachment C)

I'm available 24/7 in case there's anything further we can do to assist you in your analysis.....don't hesitate to call me at 916 947-4044.

Sincerely,

Kay Backer

helphcd30

# ATTACHMENT “ A ”

## Dwelling Units

	ISSUE	COUNTY	FOL	VARIANCE
1	Shelter Cove The service provider cannot commit to any sewer hookups	1,440	-0-	- 1,440
2	Humboldt CSD service area City Engr: 238 DU Hill St 178 DU Myrtle town * Michael Richardson 10-16-09	*2,400 +/-	416	- 1,984
3	No analysis performed by County on ___ sites	_____	?	_____
4	Ag Exclusive & TPZ zoned sites (87)	1,317	-0-	- 1,317
5	54 sites with \$100,000 + improvements	87	-0-	- 87
6	1,227 sites with -0- developability (per County)	1,645	-0-	- 1,645
	Subtotal Items 1-6 above:	6,889	416	- 6,473
7	Total dwelling units	9,921	1,000	- 8921

# ATTACHMENT “ B ”

## Footnotes

1 Dear Kay,

Attached is the spreadsheet you requested which merges the data from the two spreadsheets you sent me today (but only for the parcels identified in the County’s land inventory). Data from Parcel Quest (September, 2008 edition) is merged on all parcels with matching APNs.

I noted that 198 of the parcels included in the spreadsheet with the number 500 in the title had parcel numbers of 00000000. Therefore, I relied on the column titled apn\_fol for the parcel number, because it appeared to be more complete.

Brian

8 The County’s certification of the Housing Element’s Supplemental EIR totally ignores even the basic premise of CEQA. See Attachment “F”, “G”, and “H”.

9 As you are aware, HCAOG has not complied with the State RHNA laws. They initiated the 2-year process during the Spring of 2009. This, of course, means the County’s Land Inventory can not comply with State law until the Spring of 2011. Instead of following the 2-year State-mandated program, the HCAOG board, including the County Board of Supervisors, are attempting to compress that process down into a 6-month program.

HCAOG plans to adopt the RHNA plan on December 17, 2009.....in violation of State law.

- The Housing Element states that the FOL team identified the mid-point of development. This is not true. The FOL team identified the maximum number of dwelling units that could be developed on the sites analyzed.
- The Housing Element declares there are 9,921 dwelling units with development potential in the Land Inventory. This is an increase of 1,933 dwelling units over the 7,988 units identified in the 2004 Housing Element Land Inventory -- a twenty-four percent (24 %) increase. With the ever-increasing shortage of infrastructure, especially sewer hookups, the County’s projection of 9,921 parcels (24%) more available for development between 2009 and 2014, makes absolutely no sense.
- The Housing Element states the following criteria was used to determine which sites were included in the land inventory (left column below). Please note in the right column, what was actually used:

<u>HOUSING ELEMENT:</u>	<u>ACTUALLY:</u>	<u>Vacant Developable</u>
<u>Parcels</u>		
(1) In areas with water & sewer, parcels must have at least 2,500 sq ft of developable area	5,000 sq ft	
(2) In areas with water service, the assumed density is 1.0 acre per dwelling unit.		½ Acre / DU
(3) In rural areas, without water or wastewater		

**Improved Developable Parcel Assumptions**

- (1) Less than ¼ acre are not considered developable ½ acre
- (2) Parcels with residential development valued at \$100,000 are not considered developable in the inventory sites (87 DUs) There are 54 over
- (3) Developable land must be equal to at least three times the assumed density FOL was not told this.
- (4) Areas with water service, the maximum assumed density is 1.0 acre per dwelling unit ½ Acre / DU
- (5) In rural areas, without water or sewer service, Maximum assumed density of 2.0 acres per dwelling 1 Acre / DU

There are two problems with the above representation by the County:

- 1. If the above assertion is true, the land inventory needs to be revised, because it was not the actual criteria used by the County.
- 2. If the County does in fact intend to double the amount of land they currently require for the development of housing, it is increasing the restrictions on the development of housing and therefore *discouraging* affordable housing, not *encouraging* it as they profess

➤ The Housing Element declares there are 9,921 dwelling units with development potential in the Land Inventory. This is an increase of 1,933 dwelling units over the 7,988 units identified in the 2004 Housing Element Land Inventory -- a twenty-four percent (24 %) increase. With the ever-increasing shortage of infrastructure, especially sewer hookups, the County’s projection of 9,921 parcels (24%) more available for development between 2009 and 2014, makes absolutely no sense.

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  2. If the County does in fact intend to double the amount of land they currently require for the development of housing, it is increasing the restrictions on the development of housing and therefore *discouraging* affordable housing, not *encouraging* it as they profess.
- Finally, a couple of weeks ago, on October 19, 2009, we requested from the Planning Department, an Excel spreadsheet that reflects only those parcels that are included in the adopted land inventory. The spreadsheet they provided on October 19, 2009 is not consistent with the list of sites incorporated into the adopted Housing Element land inventory. (See attachment A)

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**RE: FOL Letter to HCD**

**Date:**

11/9/2009 5:15:21 P.M. Pacific Standard Time

**From:**

[MRichardson@co.humboldt.ca.us](mailto:MRichardson@co.humboldt.ca.us)

**To:**

[KBIUSA@aol.com](mailto:KBIUSA@aol.com)

Hi Kay,

Thanks for the clarification. I haven't got time to review these discrepancies at the moment, but after I do, I'll get back to you with an accounting of them.

Talk to you soon.

- Michael Richardson

Senior Planner

Humboldt County Community Development Services

(707) 268-3723

-----Original Message-----

**From:** KBIUSA@aol.com [mailto:[KBIUSA@aol.com](mailto:KBIUSA@aol.com)]

**Sent:** Monday, November 09, 2009 3:28 PM

**To:** Richardson, Michael

**Subject:** Re: FOL Letter to HCD

Hi Michael -

At the FOL meeting a week ago, we started by trying to fill in the "comment" column on the spreadsheet you sent me Oct 19th where you said FOL had not made any comments. Actually, if you go to your spreadsheet there is a column with the FOL comments included on many of the 500 sites listed. And as you know, we had analyzed all of the sites months ago (except for the 2,500+ added just prior to Aug) and arrived at the number of DUs each site could accommodate. However, we tried to revisit the sites on your list, and found several sites were not on the Land Inventory:

00000000 03213516  
00000000 03301124  
00000000 03301128  
00000000 03304115  
00000000 03329106  
00000000 03332103

We decided not to waste anymore time on that list, because it was not consistent with the land inventory.

Then we started comparing the spreadsheet you sent Oct 19th that was to have been the inventory adopted by the Supervisors on August 28th. That list is not consistent with the adopted Housing Element land inventory. We found a number of discrepancies.....a couple of examples are:

APN 01612105 and APN 01614119 are not on the spreadsheet provided 10-19-09.

There were more discrepancies that I've listed above.....I just don't have time to go through them all right now.

You're right.....there was a mini revolt. It has been difficult for the past 6 months getting the FOL team to give up more of their time and effort when they feel their input has been ignored. Last Monday night was the straw that broke the camel's back.

When I met with Paul McDougall Friday, I told him how frustrated some of the FOL folks are....not at you personally, but at the County.

I'd like to see how we can continue making progress on the inventory, but am at a loss to know what to do unless you can be available to participate.

Call anytime if you have any ideas.

My best,

Kay

707 834-8006

In a message dated 11/9/2009 11:46:11 A.M. Pacific Standard Time, MRichardson@co.humboldt.ca.us writes:

Sounds like a revolt! Sorry I wasn't there to help mitigate some of that.

One statement made in the letter is that, "The spreadsheet they provided on October 19, 2009 is not consistent with the list of sites incorporated into the adopted Housing Element land inventory."

While there are other parts of the letter I don't fully understand, I'm not at all clear how the spreadsheet I gave you on October 19, 2009 is inconsistent with the adopted land inventory. They should be the same. Do you know what the FOL team meant by this?

Thanks.

- Michael Richardson

Senior Planner

Humboldt County Community Development Services

(707) 268-3723

-----Original Message-----

**From:** KBIUSA@aol.com [mailto:KBIUSA@aol.com]

**Sent:** Friday, November 06, 2009 10:05 AM

**To:** Richardson, Michael; BraggLaw@sbcglobal.net

**Cc:** JTurner@lsnc.net

**Subject:** FOL Letter to HCD

Hi Michael and Bill -

I just left you a phone message, Michael.....sorry I missed you.

There was a mini revolt at the FOL meeting Monday night. They asked me to document their issues in a letter to HCD and hand deliver it....which I did yesterday. I told Paul McDougall I would get you a copy of the letter so you could respond to our comments.

Sorry I didn't get a chance to give you a heads up before now. Am attaching the letter.

If you'll give me a call when you get a minute, we'll try to figure out what's next.

My best,

Kay

707 834-8006

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**ATTACHMENT “ C ”**