



“ Jobs, Homes & Individual Rights ”

December 10, 2009

Mr. Jeff Smith, Chairman
Planning Commission
County of Humboldt
825 Fifth Street, Room 111
Eureka, California 95501

Subject: General Plan Update

Dear Chairman Smith and Members of the Commission:

As we have stated before, we appreciate the Commissioners’ desire to move the General Plan Update forward as quickly as possible. And we recognize how many hours your Commission has devoted to that end.

In light of the State’s refusal last week to certify the Housing Element adopted August 28, 2009, it is important that the County reassess the situation as it relates to the work currently underway on the remaining General Plan elements.

The State outlines very specific requirements regarding General Plan consistency, in terms of (1) Internal Consistency, (2) Consistency Between Elements, (3) Consistency Within Elements, (4) Area Plan Consistency, and (5) Text and Diagram Consistency. As an example, the Governor’s Office of Planning and Research General Plan Guidelines state: ***“The concept of internal consistency holds that no policy conflicts can exist, either textual or diagrammatic, between the components of an otherwise complete and adequate General Plan.”***

The land inventory is the heart of the General Plan. Knowing what land is available for the various uses, is essential and must drive any potential policies and programs for the remaining elements of the General Plan. As an example, land availability not only impacts sites for housing, it also influences all of the General Plan Elements:

- Land Use
- Community Infrastructure and Services
- Telecommunications
- Circulation
- Economic Development
- Conservation & Open Space
- Water Resources
- Energy
- Noise
- Safety
- Air Quality

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Currently, the County does not have a legitimate land inventory. And until such time that one is recognized by the State Housing and Community Development Department, it is not possible to anticipate policies for the other General Plan elements which may or may not be consistent with the future Housing Element when it receives certification.

You can't plan for the future until you know what you have today.

Therefore, we strongly urge the County to focus all its attention and efforts on getting the Housing Element in compliance with State law, before doing any additional work on the other General Plan elements. Otherwise, we will end up with a worthless General Plan and have to start again from the beginning as we are having to do with the Housing Element.

Thank you for addressing this important issue.

Respectfully,

Kay Backer, representing
Humboldt Economic & Land Plan

cc: Bruce Emad, Planning Commissioner
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