



April 26, 2019

John Ford, Director of Planning & Building
Planning Commission
County of Humboldt
3015 H Street
Eureka, CA 95501
via email: jford@co.humboldt.ca.us
 planningclerk@co.humboldt.ca.us

RE: Comments on Proposed Housing Element

Director Ford and Commissioners:

The mission of the Coalition for Responsible Transportation Priorities (CRTP) is to promote transportation solutions that protect and support a healthy environment, healthy people, healthy communities and a healthy economy on the North Coast of California. CRTP appreciates the opportunity to comment on the proposed General Plan Housing Element. Our comments are focused on two areas: the influence of Housing Element goals and policies on the location of future housing, and parking requirements for affordable housing.

We support the goals and policies in the proposed Housing Element that are intended to encourage infill development. However, we believe that there are other policies which could unintentionally lead to more sprawling development if additional clarity or specificity is not provided.

For example, Policy P1 calls for encouraging development of all lands in the residential land inventory to a targeted residential density. Standard S2 identifies the target density for Housing Opportunity Zones and requires development in these zones to meet or exceed that target. However, none of the draft goals, policies, standards or implementation measures define the target density for areas outside of Housing Opportunity Zones.

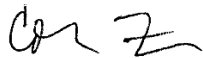
We encourage the County to clarify Policy P1 to remove the suggestion of minimum or target densities in outlying rural residential areas. We also call for some adjustments to the use of Housing Opportunity Zones. The existing zones are mostly in sensible locations of existing development, but also include a few exurban areas that are low-density and poorly served by buses and bicycle and pedestrian infrastructure. We strongly encourage the County to remove

the Zone designation from such areas, and to establish clear rules to prevent the designation from being applied to other such areas in the future.

Regarding parking, Implementation Measure IM15 requires the County to consider reductions in parking requirements for affordable housing serving the elderly and individuals with assisted care or special needs. That's a good idea, and it should be applied more broadly to all affordable housing. Parking requirements can increase the cost of building affordable housing by up to 25%, which makes it much harder for private developers to build.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Colin Fiske', written in a cursive style.

Colin Fiske

Executive Director

Coalition for Responsible Transportation Priorities

colin@transportationpriorities.org