ATTACHMENT 7

PUBLIC COMMENTS

The following public comments were received prior to the July 18th Planning Commission Workshop.

From: Colin Fiske
To: Planning Clerk
Subject: Commercial Residential & Tiny House Ordinances
Date: Tuesday, July 16, 2024 12:32:20 PM

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

Planning Commissioners,

Thank you for your efforts to promote residential development on commercially zoned parcels (implementing SB 6), as well as the development of tiny house villages. CRTP has previously submitted comments on these draft ordinances dated April 15, 2024 and June 20, 2024, and to the extent that those comments have not been addressed, we reiterate them and incorporate them here by reference. Below we comment on the new draft ordinances on your Thursday agenda.

"Commercial Residential"

- We appreciate that the new draft ordinance increases the maximum residential density and includes a new minimum density requirement of 10 units per acre. We agree with staff's reasoning on the minimum density requirement. However, we continue to object to a maximum density limit. A maximum density is an explicit limit on the amount of housing that can be provided, contrary to the purpose of the ordinance. And as we previously pointed out, the ordinance applies to zoning districts that already allow very large buildings (up to 75 feet tall in the C-2 zone).
- We feel very strongly that the infill requirement of SB 6 - applying the ordinance only to "urban clusters" - must be maintained. Staff propose removing this requirement in order to allow the ordinance to apply countywide "in less populated communities." But this will only encourage more sprawl, exacerbating existing high transportation costs and inequities, increasing wildfire exposure, and worsening the climate crisis. The county must focus on infill development instead. It would be irresponsible to take further steps to encourage housing development in remote rural areas prone to natural disasters.

Tiny Houses

- We appreciate the fact that staff have revisited density limits for tiny house developments, as the initial draft limit was clearly too low. However, the new proposals do not entirely fix the problem. One of the advantages of tiny house developments is that they can effectively and affordably increase housing density. Therefore, where higher density is appropriate - i.e., in infill areas - we strongly suggest removing the density limitation entirely and allowing builders to provide as much housing as they can on a given site. Removing density limits only in infill areas would reduce environmental impacts of new housing and therefore should alleviate staff's concerns about CEQA compliance.
- We also appreciate the fact that the draft ordinance allows for some reductions in parking requirements. However, the requirements still remain as default standards for tiny house developments. Staff defend parking requirements with a vague argument that "there may be visitors to the site and many may drive." Note the use of the word "may." Neither county staff nor anyone else can accurately predict "parking demand" for a

given project, so it makes no sense to require a specific amount of parking. It is particularly detrimental to mandate parking spaces in a tiny house project, where a single parking stall could take up more space than the home it is meant to serve - and cost almost as much, too. We again request the removal of minimum parking mandates, allowing much-needed flexibility for new tiny house projects.

Thank you for your consideration of our comments.

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Colin Fiske (he/him)
Executive Director
Coalition for Responsible Transportation Priorities
www.transportationpriorities.org

From: Damico, Tracy <TDamico@co.humboldt.ca.us>
Sent: Monday, April 15, 2024 4:13 PM
To: Ford, John <JFord@co.humboldt.ca.us>; Arroyo, Natalie <narroyo@co.humboldt.ca.us>; Bohn, Rex <RBohn@co.humboldt.ca.us>; Bushnell, Michelle <mbushnell@co.humboldt.ca.us>; Madrone, Steve <smadrone@co.humboldt.ca.us>; Wilson, Mike <Mike.Wilson@co.humboldt.ca.us>
Cc: McClenagan, Laura <lmcclenagan2@co.humboldt.ca.us>
Subject: FW: Comments for Planning Commission on Tiny Houses & SB 6 Implementation ("Commercial Residential")

Dear BOS –
This is an FYI as the COB has received this email. I have forwarded to Planning however felt that this was also meant to be shared with the BOS.
Thanks
Tracy

From: Colin Fiske <colin.fiske@gmail.com>
Sent: Monday, April 15, 2024 4:11 PM
To: COB <COB@co.humboldt.ca.us>
Subject: Comments for Planning Commission on Tiny Houses & SB 6 Implementation ("Commercial Residential")

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Planning Commissioners,

CRTP appreciates the county's efforts to create a permitting pathway for tiny houses, to implement SB 6 to allow housing on commercially zoned sites, and generally to encourage more housing to help meet the local shortfall. However, the draft ordinances you will be reviewing on Thursday have some major flaws which must be addressed to ensure that they are effective and do not undermine other important county efforts.

Tiny Homes

- **Costly parking spaces and extra-wide driveways should not be mandated for tiny house projects.** The purpose of allowing tiny houses is to encourage lower-cost housing, including transitional housing. Potential residents of such housing are among the least likely in our community to own a car. Additionally, required off-street parking will drive up the cost of these projects and likely make many potential projects infeasible. An off-street parking space, combined with the driveway space required to access it, often takes up 300 or more square feet - likely more space than the tiny house itself. This problem is exacerbated by the proposal to require extra-wide Category 2 (12 ft wide) driveways for all tiny home projects, despite the fact that County Code Section 3112-12 requires only Category 1 (10 ft wide) driveways for all other projects where the driveway is less than 1,320 ft long. Both the parking requirement and the extra-wide driveway requirement should be removed from the ordinance. For more information about why parking mandates are a bad idea, and the importance of parking reforms, I encourage you to register for CRTP's upcoming webinar on May 6th.
- **Tiny house density limits are counter-productive.** The draft ordinance proposes a density limit of 20 dwelling units per acre for tiny house projects. This is a lower limit than what is already allowed in many of the zoning districts where tiny houses will be permitted. One of the benefits of tiny houses is the ability to fit more housing units into a smaller space. It is counter-productive for the county to preemptively limit density and therefore housing unit production. Let developers and service providers build as many tiny houses as they can on a given site, as long as health and safety requirements are met.
- **Encourage locations near transit and other services.** Whenever possible tiny house projects should be located in places that are accessible by means other than private automobile. This will help ensure access and freedom of movement for residents, as well as limiting the transportation costs of living there. It will also reduce the pressure to provide costly parking spaces.

SB 6 Implementation ("Commercial Residential")

- **Maintain the SB 6 infill requirement.** The proposed ordinance does away with the SB 6 requirement that housing on commercial properties be built only in "urban clusters," meaning such development would be allowed anywhere in the county. While it is important to stimulate housing production, it is just as important for that housing to be located in the right places. The county's long-delayed Climate Action Plan, for example, will almost certainly call for housing to be located in places where residents can walk, bike, or take public transit to most destinations instead of driving. The adopted Regional Transportation Plan for the county already calls for this. This infill strategy is critical both for meeting climate targets and for keeping the housing plus transportation cost burden low for residents. If county staff believe the Census definition of "urban cluster" is too restrictive, then another reasonable definition can be used, but the county must not abandon the infill requirement for new housing on commercial properties.
- **Remove the counter-productive density limit.** Just like the tiny house ordinance, this ordinance proposes an unnecessary and counter-productive density limit. In fact, this proposed limit, at 16 dwelling units per acre, is even lower than the one proposed for tiny houses. This is despite the fact that the zoning districts at issue already allow huge commercial buildings - up to 75 feet tall in the C-2 zone - so there is no argument to be made

that denser development would be "out of character." The density limitation should be removed, or at least dramatically increased.

- **Encourage prevailing wage labor.** The proposed ordinance removes the SB 6 requirement for trained, prevailing wage labor to be used on a project. While we understand the desire to remove barriers to housing production, it is also important to support good-paying jobs and union labor, and the county should provide some incentive for developers to do so.

Thanks for your consideration.

Colin

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Colin Fiske (he/him)
Executive Director
Coalition for Responsible Transportation Priorities
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From: Meighan, Reanne
To: Planning Clerk
Subject: FW: Public Comment for Commercial Residential PC 4/18 Workshop
Date: Thursday, April 18, 2024 11:09:18 AM
Attachments: image001.png
image003.png

Good morning,

Please see below public comment for the Commercial Residential 4/18 Planning Commission Workshop.

Thank you,

Reanne Meighan
Assistant Planner
Planning and Building Department
3015 H Street | Eureka, CA 95501
Phone: 707-268-3713
Email:rmeighan@co.humboldt.ca.us

From: Elena@harealtors.com <Elena@harealtors.com>
Sent: Tuesday, April 16, 2024 4:53 PM
To: Meighan, Reanne <rmeighan@co.humboldt.ca.us>
Subject: RE: Share Your Input on the Draft Commercial Residential Ordinance on Thursday, April 18

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

Good afternoon Reanna,

I am reaching out on behalf of the Humboldt Association of Realtors® Government Relations Committee. We received the notice below regarding the upcoming Draft Commercial Residential Ordinance workshop for this Thursday. I was wondering if you had any additional information, besides what has been posted, on what is being proposed? I have emailed the workshop notice to my committee and have encourage them to attend. I anticipate the group will discuss what happens at that meeting during our upcoming committee meeting on April 24th. Any additional information I can provide to them to aid their understanding of the draft would be greatly appreciated.

Additionally, I anticipate that our group will probably form a taskforce dedicated to monitoring the creation and approval of the ordinance. The taskforce will be most likely be interested in setting up a meeting for the future to discuss the creation of the ordinance. In the past, for the sewer lateral ordinance and the short-term rental ordinance, the planning department has participated in similar

meetings with our organization. We hope to continue this working relationship into the future. The meeting would most likely be formally requested after the County's workshop and our committee meeting on the 24th, but I wanted to put it on your radar ahead of time. Maybe we could plan for early May depending on what the planning department's schedule looks like?

We look forward to our continued collaboration on this project!

Thank you & have a wonderful day,

Elena Lavoll
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