

Appendix C:

Public Comment Letters

To: Blue Lake City Staff and Council Members

RE: Comments to the Blue Lake Housing element 7th Cycle for the Public Workshop—City Council Study Session, August 1, 2026

From: Lisa Hoover

Date: July 31, 2026

Thank you for having another community meeting relative to the 7th Cycle of the Housing Element. I appreciate the community engagement and information provided. I realize the City needs to get the Housing Element updated and submitted to the California Department of Housing and Community Development. I am glad the 7th Cycle draft has been developed for review by the community and others.

The 7th Cycle Housing Element draft covered much territory and included salient details. For someone not associated with the requirements and the data sets used, there were sections that I did not focus on and others that did not always translate well for me. My comments as you will see below, are oriented toward environmental considerations and communicating those consistently, upzoning applications and acknowledging the role, the applications of government involvement.

While my comments/questions are just now being sent to you, I would like the information shared with those engaged in the Housing Element and perhaps addressed at future community meetings (if not tomorrow). If applicable, please share with the City Council Members as well.

Again, thank you.

Lisa D. Hoover

Pg 1-4/3.0 General Plan Consistency and Section 2.2. Circulation Element Constraints

From the document it states: State law requires that *“the general plan, its elements and parts thereof comprise an integrated, internally consistent, and compatible statement of policies... The Housing Element is an integral component of the Blue Lake General Plan and must be internally consistent with the goals, policies, and land-use framework established by the other General Plan elements.”* This section said that the *“City reviewed the existing General Plan to identify any inconsistencies and to determine if amendments were necessary”* but didn’t elaborate on where this applies (at least I did not see this clearly displayed in the document). One area that I have

raised over the years has to do with the current General Plan's Circulation Element and its inconsistency with what is proposed under the Housing Element (6th and 7th).

In Section 2.2 of the draft 7th Cycle Housing Element it identifies constraints related to circulation infrastructure. It states that the *"majority of vacant or underutilized land would need installation of access roads"*. With that said, the Circulation Element of the current General Plan does not address access issues related to vacant or underutilized lands. PDR-zoned parcels along South Railroad Avenue, a one-way road, is specifically mentioned *"This road section is substandard and would need to be upgraded in order to accommodate the traffic from residential buildout in this portion of the City"*.

Comment: The General Plan's Circulation Element has not been updated to address the proposed developments for vacant or underutilized (and perhaps other areas) where access/circulation is an issue, a concern. Please address the General Plan update for this element.

Program HI-10 Upzoning Properties

This section states that the City can offset the costs associated with upzoning *"eligible properties to either the R-2 or R-3 zones"* in order to *"encourage the development of a variety of housing types and tenures for all income levels"* As written, this sounds like any vacant lands in the City can be upzoned without addressing effects to the past and current land-use and potential environmental issues.

Question: Could this facilitation of upzoning apply to lands currently zoned as "agriculturally exclusive", "open space/recreation" or that are associated/connected to wetland and riparian/riverine and forested landscape settings? One example of parcels with wetland and riparian/creek environmental settings that were zoned to PDR (Planned Development Residential) are along South Railroad Avenue. Was environmental analysis undertaken to address wetland and riparian/creek settings before applying the PDR zoning?

Comment: I am not in support of upzoning open space or agriculturally exclusive parcels or parcels with wetlands, riparian/creek and forested settings or where there is a potential for run-off related to development. If such settings (e.g. agriculturally exclusive) are NOT included in the parcels potentially subject to upzoning to encourage development, then please articulate that in the 7th Cycle Housing Element.

Program HI-17

Related to the item above is the following statement in the 7th Cycle Draft: *"rezoning sites in the City that have non-residential zoning to zones allowing residential development"*. Please see my

comment above in association with HI-10 relative to lands such as “open space” or “agriculturally exclusive” and rezoning.

HI-19 and Goal HG-2

HI-19 states that facilitating affordable home opportunities is encouraged AND it also states that this could occur under the premise of “*protecting sensitive resources and avoiding hazards*”. Assuming this includes environmental issues and associated laws/government regulations, I found statements in other sections of the document that are somewhat counter to the applicable role of government oversight. For example in **Goal HG-2** (and other sections of the document) removing of “government constraints” is stated to facilitate or hasten developments.

Comment: Removing “government constraints” needs to be more clearly defined or re-phrased including examples of this application. As the 7th Cycle Element now reads, it tends to dismiss or under-rate the role of government oversight including consistency with laws and regulations (e.g. Environmental Constraints 2.1). While the document is intended to present what is applicable to facilitate affordable housing opportunities, the generic use of “government constraints” doesn’t communicate how and where this applies for example.

Environmental Constraints: 2.1 and CEQA

While this section of the document did include mention of “Streams and Water Bodies” other environmental elements were not raised in the 7th Cycle Housing Element that were included in the previous Housing Element. Example is below from page 57 of the 6th Cycle document :

Special Status species (e.g. migratory bird species), etc.

“future residential development may have the potential to result in significant impacts to ...special status species (e.g. migratory bird species), sensitive natural communities such as riparian habitat and federally protected wetlands.”

Another topic I have raised at previous meetings related to the Housing Element, is the need to address cumulative effects of developments. While the Housing Element is not the place to address specifics of cumulative effects, the 7th Cycle revision needs to acknowledge that this will need to be done. While I am aware that categorical exemptions exist within CEQA relative to meeting housing needs, there are exceptions to the use of categorical exemptions per public resources code (21159.24):

- *Cumulative impacts of developments*
- *Potentially hazardous waste sites*
- *The project and other prior approved projects can be adequately served by existing utilities*
- *Consistency with the General Plan.*

Comment: While specifics may not be available at this time, I would ask that the 7th Cycle Housing Element address this item to provide clarification and how/when cumulative effects are going to be assessed.

Fw: Eliason subdivision housing element proposal

From Michelle Nielsen <MichelleN@planwestpartners.com>

Date Wed 9/2/2026 1:13 PM

To Vanessa Blodgett <vanessab@planwestpartners.com>

 2 attachments (190 KB)

Eliason subdivision proposal.pdf; Blue Lake APNs (4).JPG;

Michelle Nielsen, AICP
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Arcata, CA 95521
Office: (707) 825-8260, ext. 105

NOTE: I'll be out of the office all day on Fri. 9/4, and the Planwest office will be closed Mon. 9/7.

From: Jennie Short <citymanager@bluelake.ca.gov>

Sent: Tuesday, September 1, 2026 4:11 PM

To: Michelle Nielsen <MichelleN@planwestpartners.com>; Garry Rees <grees@shn-engr.com>

Subject: Fwd: Eliason subdivision housing element proposal

FYI.

Thanks,

Jennie

Forwarded message

From: Casey Eliason [REDACTED]

Date: Thu, Aug 27, 2026 at 12:43 PM

Subject: Eliason subdivision housing element proposal

To: comments@bluelake.ca.gov <comments@bluelake.ca.gov>

To whom it may concern,

I would like to propose changes to the Eliason subdivision in Blue Lake. We are asking to get on the State Housing Element list to help meet the cities needs to the State. After a long process getting this subdivision where it is today, We understand the unique needs and desires of the City of Blue Lake. We are committed to building to a aesthetically high standard regardless of the income level of the potential tenants. We would like to see equitable opportunity for all income levels across these four lots. Hopefully this will be seen as a benefit to the city and its population. Thank you for your consideration.

Casey and Stacia Eliason

Eliason subdivision housing element proposal				
Parcel	Acreage (from map)	Square Feet	Proposed development	Proposed dev. footprint
025-101-024 (Greenwood)	0.41 Ac±	≈ 17,860 sq ft	6-8 units	4500-9500 sq ft
025-101-025	0.40 Ac±	≈ 17,424 sq ft	6-8 units	4500-9500 sq ft
025-101-026	0.74 Ac±	≈ 32,234 sq ft	two 4 plexes	6000-8000 sq ft
025-101-027 (Railroad)	1.51 Ac±	≈ 65,776 sq ft	two 8 plex or four 4plex	19000 sq ft