From:	Jacob Patterson
To:	Gonzalez, Joanna
Subject:	Fwd: Public comments on the draft MND for the pending housing element updates
Date:	Wednesday, August 14, 2019 11:37:24 AM

Joanna,

I didn't see my timely MND comment letter (below) or the comment letter from CDFW in the meeting packet for tonight's continued public hearing on the Housing Element. Please be sure both get added to the file and are distributed to the commissioners tonight. The letter from CDFW is referenced in the revised MND but not included in the packet. I think both written comments should be included: my email as a public comment, and the letter CDFW as a responsible agency comment.

Thanks,

--Jacob

---------- Forwarded message ---------
From: **Jones, Marie** <mjones@fortbragg.com>
Date: Mon, Jul 8, 2019 at 1:58 PM
Subject: RE: Public comments on the draft MND for the pending housing element updates
To: Jacob Patterson <jacob.patterson.esq@gmail.com>

Hello Jacob,

Thanks for sending your email. I will include it in the administrative record for the project and attach it as a comment letter to the Planning Commission's agenda packet for their consideration of MND and the Housing Element.

Marie Jones

Community Development Director

707-961-1807

From: Jacob Patterson <jacob.patterson.esq@gmail.com>
Sent: Monday, July 8, 2019 1:32 PM
To: Jones, Marie <mjones@fortbragg.com>
Subject: Public comments on the draft MND for the pending housing element updates

Marie,

I reviewed the draft Mitigated Negative Declaration (MND) for the draft updates to the City's Housing Element(s) and have a few comments and concerns that I want to relay during the public review period. In my opinion, it appears that the suggested mitigation measures demonstrate various ways that the draft updates to the housing elements are not actually consistent with the balance of Fort Bragg's two general plans. Since consistency with the rest of applicable general plans is a required prerequisite for the City of Fort Bragg to adopt updated housing elements, I believe the draft housing elements need to be revised to address the inconsistencies now rather than trying to defer making sure everything is internally consistent in the form of purported mitigation measures requiring future revisions to the general plans to maintain the required consistency.

As such, I object to the MND to the extent that it already identifies inconsistencies with the rest of the general plans. I believe it needs to be revised and recirculated, or a full EIR needs to be developed, in order to fully analyze the programs' consistency with the rest of the City's two general plans. This is particularly true for the programs you identified in the MND as being potentially problematic. But it is also true for whatever revisions you have prepared for the draft programs to provide the requisite level of additional detail that is required of programs in housing elements because the additional detail needs to be reviewed for consistency with applicable general plan polices and other provisions.

Of course, these are my personal opinions that you can't rely on and you should seek legal advice about the housing element and related environmental review from the City's legal counsel, including any issues I raise in comments submitted on my behalf or on behalf of others.

Regards,

--Jacob

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