



March 15, 2019

Planning Commission  
County of Humboldt  
3015 H Street  
Eureka, CA 95501  
*via email:* [planningclerk@co.humboldt.ca.us](mailto:planningclerk@co.humboldt.ca.us)

**RE: Comments on Proposed Zoning Text Amendments to Implement the General Plan Update**

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 zoning text amendments meant to implement the County's new General Plan. Our comments are focused on town center areas and the proposed new Mixed Use zones, as these contain the greatest opportunity to allow and encourage active and public transportation.

Proposed Mixed Use Zone Parking Standards Run Contrary to the Zones' Purpose

The purpose of the proposed mixed use zones is to "help create town centers" and to "promote higher density urban housing in concert with retail commercial uses, day care centers, and shop fronts" (General Plan Policy UL-P6). Moreover, arguably the most prominent proposed mixed-use zoning area is in the county's only currently designated town center area, in McKinleyville, and General Plan Policy UL-P7 requires town centers to be developed with a pedestrian orientation. The proposed text for the mixed use zones also recognizes explicitly that development therein must be "pedestrian-oriented."

However, by applying substantially the same off-street parking standards to mixed use zones as to all other zones, the proposed text will result in auto-oriented development which is low-density and unfriendly to pedestrians. Furthermore, General Plan Policy UL-P7.B requires the county to reduce off-street parking requirements in town center areas (where McKinleyville's and likely other future mixed use zones will be located). While we appreciate that in response to our previous comments, the proposed standards have been modified to allow some potential reductions in parking requirements at the Commission's discretion, this provision does not go nearly far enough to ensure or even allow pedestrian-oriented development. The

mixed use zone parking standards should be amended to exempt new development in these zones from any off-street parking minimums and instead require developments to demonstrate accommodation of transportation needs through pedestrian, bicycle, car share and/or transit amenities.

#### Proposed Mixed Use Development Standards Do Not Encourage Required Density

In addition to the problem of parking standards noted above, other development standards do not meet the General Plan's requirement of providing higher density development (Policy UL-P6). Most notably, although proposed yard setbacks have been somewhat reduced compared to other zones, they still will be applied in many cases, resulting in lower density. Precisely in order to avoid this scenario, General Plan Implementation Measure UL-IM1 calls for "establishing build-to lines rather than setback lines, or a combination of the two" in town center areas. To ensure conformance with the General Plan, the mixed use zoning regulations—and regulations for any other zones anticipated to be located within town center areas—must be amended to include build-to lines which encourage higher density.

#### Mixed Use Zones Must Be Expanded, or Text Amendments Made to Other Zones

General Plan Policy UL-P7.A requires the county to allow a mix of residential and commercial uses in town center areas. The county's only currently designated town center area is in McKinleyville, and here the urban mixed-use zone is proposed to apply only to a fraction of the land within the town center boundaries. We recognize that the Commission is currently only considering zoning text amendments and not zoning map amendments. However, if the County does not plan to apply the mixed-use zones to all parcels within town center boundaries, then the regulations for other zones found within those boundaries—notably various commercial and residential multifamily zones—must be amended to encourage mixed uses and pedestrian orientation in order to ensure compliance with the General Plan.

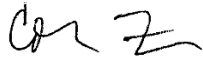
#### We Propose a Different Approach to Regulating Use Types in Mixed Use Zones

Given that the mixed use zones and town center areas are intended to allow a diversity of uses at pedestrian scales, and that the County has not yet embarked on the community planning process which will develop standards and priorities for these areas informed by each local community, we suggest that the typical approach of enumerating principally and conditionally permitted uses may be inappropriate in this case. Instead, we recommend that the mixed use zone regulations eliminate lists of uses (and possibly many of the development standards as well), and instead simply require new development in these zones to meet the yet-to-be-developed standards and use restrictions of the community planning area in which they are located. The McKinleyville Municipal Advisory Committee has recommended a substantially similar approach.

If you do not take this recommended approach, at the very least, single family residential should not be considered a principally permitted use in mixed use zones, as this will result in lower density and auto-oriented development, contrary to Policies UL-P6 and UL-P7.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Colin Fiske".

Colin Fiske

Executive Director

Coalition for Responsible Transportation Priorities

[colin@transportationpriorities.org](mailto:colin@transportationpriorities.org)