



November 15, 2021

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**RE:    Draft McKinleyville Town Center Ordinance**

Dear Mr. Miller:

The Coalition for Responsible Transportation Priorities (CRTP) appreciates the opportunity to comment on the draft McKinleyville Town Center ordinance (“ordinance”). We recognize and appreciate both the extensive public process and the significant investment of staff time that have led to the development of the ordinance. We submit these comments with the intent to build on this work to help ensure the best possible outcomes for McKinleyville and the broader Humboldt County community. All section numbers and other references in these comments refer to the draft ordinance, unless otherwise specified.

**Zoning Map**

We disagree with the decision to separate the developable areas of the Town Center into two distinct mixed use zones and a residential zone. Instead, we encourage the County to zone all developable lands (i.e., those that are not public facilities or designated open space) as what is currently called the “Mixed Use Core” zone. This zone most closely represents the density and development standards appropriate for a true town center. By zoning the rest of the area for lower density, the current Zoning Map (Map 1) effectively limits the scope of the actual town center. At a minimum, if the County chooses not to expand the “Mixed Use Core” designation to all developable areas, it is imperative that the designation at least be extended to the entirety of the area bounded by Pickett Road to the north, Central Avenue to the East, Hiller Road to the south, and the designated open space areas to the west. Currently, this area appears as a gaping hole of lower density “Mixed Use General” zoning in the exact middle of the Town Center, surrounded by higher-density “Mixed Use Core” zoning. This configuration makes no practical or aesthetic sense and will significantly hamper successful future development of the Town Center.

## Core Mixed Use Zone

The “Core Mixed Use” zone, also labeled “TC-CORE,” is intended to accommodate and encourage the highest density development. In general, we appreciate and support the development standards proposed for this zone. We submit the following specific comments for your consideration:

- We note that the term “incidental public service purposes” is defined at Section 313-144 of the Humboldt County Code, pertaining to the Coastal Zone, but is not defined for areas outside the Coastal Zone. Nevertheless, based on the definition found at Section 313-144, we are concerned that the prohibition of incidental public services in the TC-CORE zone (Table 3.1-1) may limit the ability of property owners to bury necessary utility lines in the Town Center area. Similarly, we are concerned that without a precise definition, the prohibition on “community-scale renewable energy generation and distribution facilities” in the TC-CORE zone may limit the ability of property owners to fulfill the maximum potential of large building rooftops for solar photovoltaic arrays. We encourage the County to carefully define these terms to ensure that they do not hamper the use of ambitious and innovative green building techniques in the future.
- We strongly support the inclusion of build-to lines (BTL) in the TC-CORE zone to encourage pedestrian-friendly street frontages (Section 3.4.4.2). However, we find the requirement that only 30% of side-street frontages on corner lots meet the BTL to be inadequate. All building frontages facing the pedestrian zone should be required to meet the 80% BTL requirement; vehicle-oriented uses, such as loading zones, can be accomplished on non-pedestrian frontages.
- We also appreciate the forecourt design standards found at Section 3.4.5.2, which help to ensure that where a building does not meet the BTL, it still presents a pedestrian-friendly design. However, we fail to see the purpose of requiring a minimum depth for forecourts, particularly a depth as great as 20 feet (Section 3.4.4.2). Shallow forecourts can provide a pedestrian environment at least as welcoming, and likely more so, than deep forecourts. We encourage the County to remove the minimum forecourt depth requirement.
- We encourage the County to increase the minimum building height in the TC-CORE zone from 2 stories to 3 stories to better ensure density levels appropriate to a town center (Section 3.4.4.2).
- Section 3.4.4.2 sets differing maximum building heights for different sides of the street. We appreciate the effort to maximize for passive solar gain in our cool climate, but we are confused by the maximum height being set higher on the south side of the street than the north. This would have the effect of blocking winter sunlight to the north side of the street. We suggest that the height maximums be reversed, to allow taller buildings on the north side of the street. Additionally, we are uncertain of the purpose of setting differing maximum building heights for the east and west sides of the street, since this results in blocking morning light. We suggest that maximum heights be set at 4 stories for both east and west sides of Central Avenue.
- We note the following errata:

- Section 3.4.4.2 contains the phrase “See note 1” regarding front setbacks for parking areas, but there does not appear to be a relevant “note 1.”
- Section 3.4.5.3 identifies the section containing blank wall standards as Section 3.3.5.4, but it is actually Section 3.4.5.4.

### **Other Zones**

As noted above, we encourage the County to apply the TC-CORE zone to all areas not designated for public use or open space. However, should the County choose not to follow this course, we submit the following additional comments:

- Requiring minimum building setbacks for the “Mixed Use General” (TC-MU) and “Residential Multi-Family” (TC-MF) zones (Sections 3.5.2.2 and 3.6.2.2), and allowing even greater setbacks by failing to adopt a BTL, will result in a significantly less walkable Town Center, failing to meet one of the primary goals of the project. We suggest that these zones, if retained, include the same BTL requirements as the TC-CORE zone. For similar reasons, we recommend removing minimum lot sizes, widths and depths in these zones (Sections 3.5.2.1 and 3.6.2.1).
- Section 3.6.3.1 requires wood-burning appliances in residential buildings to meet certain standards. We suggest that the ordinance instead simply require all-electric construction for new buildings, both to avoid indoor and outdoor air quality issues in the Town Center area and to help meet the county’s greenhouse gas reduction targets.

### **Active Transportation Infrastructure**

We support the draft ordinance’s emphasis on active transportation infrastructure and walkability. We particularly support the elimination of mid-block curb cuts on Central Avenue (Section 3.4.3.1) and the provision of separated bicycle and pedestrian lanes on the Mid-Town Trail in recognition of the differing needs of users (Section 4.2.3.1). We submit the following additional comments:

- The extensive network of “pedestrian and bicycle thoroughfares” shown in Map 2 is encouraging. However, no definition of “pedestrian and bicycle thoroughfare” is provided, and the thoroughfare standards provided at Section 4.1 suggest that this term may encompass a wide variety of infrastructure types. Map 2 should specify which type of infrastructure will be provided in each location, or minimum standards for “pedestrian and bicycle thoroughfares” should be adopted.
- The Mid-Town Trail design in the Town Center area appears to make a number of unnecessary 90-degree turns (Maps 2 and 3). This will make the trail significantly less convenient and comfortable, particularly for bicyclists, which will diminish its usefulness as an active transportation commuting facility. We encourage the county to avoid sharp turns on the trail to the greatest extent feasible.
- Section 4.1 specifies that “pathways and trails shall adhere to the Humboldt Regional Bicycle Plan, Design and Maintenance Standards.” However, that Plan does not include adopted standards for design and maintenance.

- We recognize that the ordinance cannot provide engineering-level details for street and road design. However, community input to date has emphasized the importance of bicycle and pedestrian crossings and intersections, and we are concerned that the street cross-sections provided in the ordinance do not create clear conditions for safe and comfortable intersection treatments. For example, Central Avenue and Hiller Road cross sections at Sections 4.2.1.1 and 4.2.2.1, respectively, show parking-protected bike lanes. These lanes, while they have many advantages, tend to create problems at intersections due to lack of bicyclist visibility. We urge the County to include basic design standards for bicycles and pedestrians at intersections in the Town Center area.
- We support reducing the number of traffic lanes on Central Avenue from 5 to 3 in the Town Center area. If Central Avenue is going to retain 5 full vehicle lanes in the Town Center area, as indicated in Section 4.2.1.1, then one lane in each direction should be a designated transit-only lane.
- Section 4.2.2.1 shows a two-way cycle track on the north side of Hiller Road. While this design has some advantages, it also makes it more difficult for bicyclists to access destinations on the other side of the road. We encourage the County to provide bicycle infrastructure on both sides of the road.
- Section 4.2.3.2 shows a cross-section for future interior Town Center streets with raised bike lanes contiguous with sidewalks. We encourage the County to add some kind of separation between sidewalks and bike lanes in order to minimize conflicts between bicyclists and pedestrians.
- Section 4.2.4 specifies that street trees cannot conflict with emergency vehicles. It should also specify that street trees cannot conflict with reasonable use of the street and sidewalks by bicyclists and pedestrians, including by maintaining clear paths, avoiding sidewalk distortion from root intrusions, and choosing trees which do not shed excessive biomass onto bike lanes and sidewalks.
- Section 5.2.3 requires bike parking for new developments, but does not include specifications for design. Bike parking varies widely in quality and usefulness. The ordinance should specify standards such that bike parking spaces securely accommodate the full range of pedal-powered vehicles. Furthermore, Section 5.2.3.2 requires only ½ of a bike locker per residential unit. Half a locker is useless to someone who wants to ride a bike. In order to encourage bicycling, the requirement should be increased to 1 bike locker per unit.
- Section 5.2.3.1 requires only 3 bike parking spaces for commercial or mixed use developments of 10,000 square feet or more, with no additional spaces required for larger uses. This is nowhere near enough. Bike parking spaces should be provided at a ratio of one space for every 500-1,000 square feet of commercial or mixed use space.
- Section 5.5 “encourages” the use of pedestrian-scale lighting in pedestrian-oriented areas. Pedestrian-scale lighting should be required in these areas, not just encouraged. Lack of pedestrian-scale lighting is an important deterrent to walking in many areas, and contributes to unsafe conditions.
- Section 6 establishes standards for signs. This section should include a specification that no sign may obstruct clear paths of travel for pedestrians or bicyclists.

## Vehicle Parking

Section 5.2 both specifies minimum parking requirements for the Town Center area and seems to imply that the “Mixed Use (Urban)” parking requirements found at Humboldt County Code Section 314-9.3 apply to the Town Center area. However, since the ordinance is creating new zones specific to the Town Center, these requirements do not apply. We strongly encourage the County to remove minimum vehicle parking requirements altogether from the Town Center ordinance. Minimum parking requirements inevitably reduce density, increase conflict points with bicyclists and pedestrians, and create un-walkable communities, in conflict with the community vision for the Town Center. We further encourage the County to include alternative interior street cross sections (Section 4.2.3.2) with no vehicle parking, and with parking on only one side of the street. Requiring parking on both sides of all interior streets, especially in conjunction with off-street parking, unnecessarily limits density and mandates a less inviting streetscape.

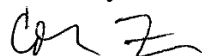
## Other Comments

We submit the following additional comments:

- Table 3.1-1 does not list single-family residential as a potential use. We wholeheartedly agree that this should not be an allowable use in the Town Center area. However, we suggest that for clarity’s sake it may be helpful to list it as a use and specify that it is not allowable.
- Section 5.1 contains building energy efficiency requirements. We support including these requirements. However, one of the options provided is for buildings to meet LEED certification standards, without specifying which level of LEED certification is required. We suggest specifying LEED Gold level certification.
- We appreciate the fact that landscaping standards at Section 5.4 encourage the use of native plants and discourage excessive turf. However, we encourage the County to go further and simply require native plant landscaping and prohibit the use of turf.
- Lighting standards at Section 5.5 should require that all new lighting be dark-sky compliant.
- Section 7.2 specifies that “Important Trees,” defined by their diameter at breast height, should be preserved. We support this measure. However, the County may wish to consider including an exception for invasive and/or non-native species.

Thank you for your consideration.

Sincerely,



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Executive Director

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