



November 11, 2020

Desmond Johnston
County of Humboldt
Planning and Building Department
3015 H Street
Eureka, CA 95501

via email: CEQAResponses@co.humboldt.ca.us
djohnston@co.humboldt.ca.us

RE: North McKay Ranch Subdivision Project Recirculated Partial Draft Environmental Impact Report

Mr. Johnston:

The Coalition for Responsible Transportation Priorities (CRTP), the Environmental Protection Information Center (EPIC), the Northcoast Environmental Center (NEC), and Humboldt Baykeeper have reviewed the recirculated project description, land use and planning, and transportation sections of the North McKay Ranch Subdivision Project ("project") Draft Environmental Impact Report ("Recirculated DEIR"). Unfortunately, the Recirculated DEIR does not address any of the comments we made in our letters dated June 22, 2020 and June 29, 2020, despite the fact that the bulk of those comments pertained to the recirculated portions of the document. Remarkably, the Recirculated DEIR failed to even update its reference to the 2012 Regional Bicycle Plan, which we pointed out in our previous comments has been superseded by a 2018 Update.

Therefore, we reiterate our June 22, 2020 and June 29, 2020 comments, and incorporate them herein by reference. Given the high rate of relative sea level rise in the Humboldt Bay area and the many environmental, social, and economic impacts that Humboldt County residents will face as a result, it is paramount that we reduce greenhouse gas emissions that are within the County's jurisdiction to the greatest extent feasible. We must not continue to expand auto-centric development locally if we expect to slow the rate of climate change impacts such as sea level rise. We add the following specific comments.

Level of Service Analysis Should Not Be Retained

Despite recirculating the DEIR for the stated reason of compliance with SB 743's mandate to move from congestion-based Level of Service (LOS) impact analysis to vehicle miles traveled (VMT) analysis, the Recirculated DEIR uses a loophole to retain its LOS analysis and mitigation

measures. The new document simply moves the analysis from the Transportation section, where it is no longer allowed, to the Land Use section, under the guise of consistency with the Humboldt County General Plan, and reclassifies the related infrastructure changes from “mitigation measures” to “conditions of approval” (see Tables 3.11-1 and 3.16-2). In our June 22, 2020 comments, we explained in detail why LOS analysis simply does not belong in CEQA documents any longer, and we refer you that explanation once again. We urge you to remove LOS analysis from the DEIR entirely.

The Project is Inconsistent with the Humboldt County General Plan

Tables 3.11-1 and 3.16-2 purport to assess the consistency of the project with various Humboldt County General Plan policies. These assessments as they pertain to transportation-related policies are completely inadequate. In particular:

- Policy C-P11 requires residential subdivisions to comply with County Transportation Demand Management (TDM) programs. The Recirculated DEIR’s assessment of consistency with this policy refers to signalized intersection improvements and plans to deal with traffic impacts from construction. Neither of these measures is in any way related to the definition of TDM. TDM consists of strategies specifically meant to reduce single-occupancy vehicle usage in order to maximize transportation efficiency.¹ The County’s TDM programs are largely adopted through the Regional Transportation Plan (RTP). For example, General Plan Policy C-P22 calls for the County to “support the implementation of guiding goals, policies and objectives of the Public Transit and Paratransit Service Element of the Regional Transportation Plan as amended.” Relevant 2017 RTP policies include:
 - Policy PT-1 calls for funding for increased transit trip frequency.
 - Policy PT-4 calls for “transit-friendly development.”
 - Policy PT-5 calls for enhancing pedestrian access to bus stops.
 - Policy PT-7 calls for developing local funding sources for transit system expansion, including developer impact fees.

Yet the project is not transit-friendly, provides no enhanced pedestrian access to bus stops, and provides no funding for improving transit service for future residents. In fact, the project contains no TDM measures at all, and is therefore inconsistent with both Policy C-P11 and policies such as C-P1 and C-P24 which call for support for non-SOV modes.

- Policy C-P34 calls for the use of traffic calming measures wherever feasible and appropriate. The Recirculated DEIR’s assessment of consistency with this policy refers to intersection improvements to reduce traffic congestion. Such improvements have nothing to do with traffic calming, which is defined as strategies to reduce vehicular speed—the exact opposite of reducing congestion. In fact, the project contains no traffic

¹ Association for Commuter Transportation. Undated. What is TDM?
<https://www.actweb.org/i4a/pages/index.cfm?pageID=3473>

calming measures, despite such measures being clearly feasible and appropriate, and therefore runs afoul of Policy C-P34.

- Policy E-P5 recognizes the Redwood Coast Energy Authority (RCEA) and its Comprehensive Action Plan for Energy (CAPE) as the governing document for “countywide strategic energy planning, implementation and education.” The Recirculated DEIR does not mention this policy. However, the CAPE calls for a 25% reduction in countywide VMT by 2030 and a 65% reduction in greenhouse gas (GHG) emissions from transportation by 2030. The project includes no measures to reduce VMT nor to reduce GHG emissions from transportation and thus is clearly inconsistent with these targets without further mitigation.

The Project Creates Obstacles to Active Transportation and Transit

The brief and unsupported bicycle and transit impact analysis (p.3.16-8) retains all of the fatal flaws noted in our letters dated June 22, 2020 and June 29, 2020. Furthermore, the newly stated conclusion that the project “would not block, remove, or create barriers for” walking, biking or transit is unsupported by any reasonable analysis or evidence. The Recirculated DEIR states that the project “would provide facilities to encourage non-motorized transportation” (p.3.16-13), but describes no such facilities aside from sidewalks provided to meet legal standards. Moreover, the document itself admits that the nearest transit stop (for a low-frequency bus route) is 0.5 miles from the project site; in fact, many of the project’s residences will be significantly further away than that. In contrast, 0.25 miles is generally considered the appropriate distance for generating substantial bus ridership, and increasing distance from stops results in dramatic declines in ridership and corresponding VMT impacts.² The Recirculated DEIR also admits that “there are limited bicycle facilities in the Project vicinity” (p.3.16-13), and the project does not include any bicycle or transit improvements. The project’s distance from services and employment centers and lack of meaningful access to active transportation and transit is itself an obstacle to using these modes of transportation, resulting in higher VMT.

The Project’s VMT Analysis Remains Fatally Flawed

The Recirculated DEIR’s VMT analysis, while slightly more detailed than the previous version, retains its fatal flaw: the use of county-wide per capita average VMT as the basis for comparison, rather than Eureka-area per capita VMT (p.3.16-11). We reiterate our critique of this approach from our letter dated June 22, 2020, and repeat for emphasis: “The project clearly and unequivocally proposes a suburb of the City of Eureka. The appropriate population

² Tal, Gil, Susan Handy and Marlon G. Boarnet. 2013. Policy brief on the impacts of transit access (distance to transit) based on a review of the empirical literature. California Air Resources Board. https://ww2.arb.ca.gov/sites/default/files/2020-06/Impacts_of_Transit_Access_%28Distance_to_Transit%29_Based_on_a_Review_of_the_Empirical_Literature_Policy_Brief.pdf.

for VMT comparison is therefore the city and its immediately adjacent neighborhoods, not the largely rural surrounding region.” We also note with disappointment that the Recirculated DEIR omits the previous version’s admission that the project’s per capita VMT will likely be higher than that of Eureka, which we repeat is the relevant standard of comparison. We urge the County to adopt a reasonable policy formalizing such a standard of comparison for VMT analysis under SB 743 as soon as possible.

The Project’s GHG Impact Assessment is Flawed and Proposed Mitigation Inadequate

Although the DEIR’s Greenhouse Gas Emissions chapter is not being recirculated, the project’s GHG impact is tied inextricably to its transportation impacts, so we comment again on these impacts here:

- The CAPE calls for a 20% reduction in GHG emissions from fossil fuel use in buildings by 2030, on track for a 90% reduction by 2050. The project intends to connect its residences with natural gas service, presumably for space heating, water heating, cooking, and other uses, which is inconsistent with the CAPE’s goal of reducing fossil fuel emissions from buildings. It is therefore also inconsistent with General Plan Policy E-P5.
- Implementation of MM GHG-2, removal of woodburning devices in multi-family residential (presumably for space heating), would result in an increase in projected GHG emissions from the Energy Consumption source category, given that the heat from woodburning devices must be offset by another source, presumably natural gas. Table 3.8-2 should reflect this increase.
- The DEIR is incorrect in concluding that the project has exhausted all feasible GHG mitigation measures. As noted in our letter dated June 29, 2020, additional feasible mitigation measures include all-electric development, native plant landscaping, removal of woodburning devices from all residential development, and actions to reduce VMT including construction of bike infrastructure, provision of free bus passes to residents, car-share and bike-share programs, traffic calming, and a reduction in the number of parking spaces provided.

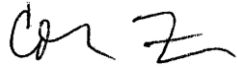
In conclusion, the Recirculated DEIR’s analysis of vehicular, active transportation and transit, and GHG impacts all continue to be inadequate. The project’s land use impacts, VMT impacts, active transportation impacts, transit impacts, and GHG impacts are all clearly significant. The project must adopt mitigation measures including new bicycle and transit facilities connecting with existing networks, traffic calming measures, TDM measures, all-electric construction, native landscaping, and removal of woodburning devices. Furthermore, to ensure compliance with the General Plan and the CAPE, the DEIR must demonstrate that these measures collectively achieve a reduction in annual VMT equal to 25% of new long-term annual operational VMT induced by the project, and a legislative-adjusted³ reduction in annual GHG

³After crediting for state legislative impacts from SB 32, RPS, Advanced Clean Cars, and Advanced Clean Trucks

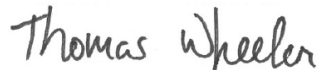
emissions equal to 65% of new annual operational GHG emissions resulting from new long-term annual operational VMT induced by the project.

Thank you for your consideration of our comments.

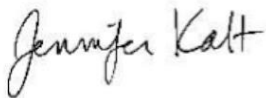
Sincerely,



Colin Fiske
Executive Director
Coalition for Responsible Transportation Priorities
145 G Street, Suite A
Arcata, CA 95521
colin@transportationpriorities.org



Tom Wheeler
Executive Director and Staff Attorney
Environmental Protection Information Center (EPIC)
145 G Street, Suite A
Arcata, CA 95521
tom@wildcalifornia.org



Jennifer Kalt, Director
Humboldt Baykeeper
600 F Street, Suite 3 #810
Arcata, CA 95521
jkalt@humboldtbykeeper.org



Caroline Griffith, Co-Executive Director
Northcoast Environmental Center
PO Box 4259
Arcata, CA 95518
carolineneemail@gmail.com