



July 25, 2022

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*via email:* Deirdre.clem@humboldt.edu

**RE: Craftsman Mall Student Housing Project NOP Scoping Comments**

Ms. Clem:

The Coalition for Responsible Transportation Priorities (CRTP), Humboldt Baykeeper and the Northcoast Environmental Center (NEC) have reviewed the revised Notice of Preparation for an Environmental Impact Report (NOP) for the proposed student housing project (“project”) at the site known as the Craftsman Mall in Arcata, California. We recognize the urgent need for student housing and the appropriateness of the location near both the Cal Poly Humboldt campus and downtown Arcata. Therefore, we support this project in concept. We submit the following comments on the NOP:

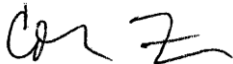
- We appreciate the NOP’s acknowledgement that the project could result in a significant increase in vehicle trips, along with attendant air quality, energy, greenhouse gas, and noise impacts. Pursuant to SB 743 and subsequent state-issued CEQA guidance, the EIR must assess the per capita vehicle miles traveled (VMT) of future residents of the project compared to an area baseline. We request that the baseline be considered the average per capita VMT from the McKinleyville-Arcata-Eureka area, which encompasses both the vast majority of the university’s student and employee residential catchment area as well as all areas potentially feasible for the development of future student housing. Therefore, following the state’s guidance, we request that the significance threshold for VMT impacts be considered 15% below the average per capita VMT for the McKinleyville-Arcata-Eureka area. We further request that, in projecting the per capita VMT of future project residents, the EIR acknowledge and incorporate the well-documented influence of vehicular parking on vehicle ownership and driving habits (i.e., free and abundant residential parking leads to higher vehicle ownership and higher per capita VMT).
- We also appreciate the NOP’s acknowledgement that the project could result in impacts related to “potential traffic hazards on local roadways.” We request that the EIR acknowledge that a significant increase in vehicular traffic can result in traffic hazards as well as what CEQA Guidelines refer to as “incompatible uses.” In other words, if

vehicular traffic increases significantly on a particular roadway which lacks adequate and sufficient bicycle and pedestrian facilities (including closely spaced safe crossings), the overall level of vehicular use could become incompatible with walking, biking and rolling, resulting in a significant impact under CEQA.

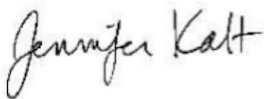
- The project site has a long history of industrial activities, including a leaky underground storage tank, trucking facility, and a lumber mill with a conical burner that burned wood waste during the era that the dioxin-containing wood preservative pentachlorophenol was commonly used. As a result, there are areas of contamination that were identified in the Phase I and Phase II Environmental Site Assessments and Draft Environmental Impact Report conducted for The Village Project as proposed by AMCAL Equities, LLC. As plans are developed for on-site stormwater infrastructure to infiltrate runoff into the soil, areas with remaining or previously unidentified contamination should be carefully assessed and avoided to ensure that stormwater features are not built in or near contaminated areas. If stormwater comes into contact with contaminated soil, groundwater and bay tributary streams could be impacted.
- The close proximity of the project site to Highway 101 is likely to result in exposure to pollutants from motor vehicles. Research has demonstrated that exposure to pollutants emitted from motor vehicles can cause impaired lung function, heart problems, cognition problems and premature death. We request that the EIR analyze the health and environmental justice impacts of housing students in close proximity to a major highway, and include an assessment of air quality at the site.

Thank you for your consideration of our comments.

Sincerely,



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