



May 7, 2025

Humboldt County Planning and Building Department
Long Range Planning
3015 H Street
Eureka, CA 95501

via email: CEQAresponses@co.humboldt.ca.us
cc: jford@co.humboldt.ca.us

RE: Draft McKinleyville Town Center Environmental Impact Report

Dear Humboldt County Planning and Building Department:

The Coalition for Responsible Transportation Priorities (CRTP) and the Environmental Protection Information Center (EPIC) appreciate the opportunity to comment on the McKinleyville Town Center Zoning Amendment Draft Environmental Impact Report (DEIR). We recognize and appreciate both the extensive public process and the significant investment of staff time that have led to the development of the Zoning Amendment, and we support many aspects of it, including the designation of the majority of the Town Center for mixed uses, the focus on walkable and bikeable design and pedestrian-friendly street frontages, the significant parking policy reforms, and the new street designs for bike and pedestrian safety.

Our comments herein are focused on improving the accuracy, completeness, and defensibility of the DEIR.

1. The EIR must clearly state that the county will not pursue the traffic study's recommended infrastructure changes, or must reassess impacts.

Appendix E to the DEIR is the Traffic Operations Study for the McKinleyville Town Center Project ("traffic study"). The sole purpose of this study is to predict future congestion at certain intersections in the vicinity of the Town Center, as measured by vehicular level of service (LOS), and recommend infrastructure changes at those intersections to reduce vehicular delay.

Vehicular congestion is no longer considered an environmental impact under CEQA, and LOS impacts are not considered in the main body of the DEIR. However, the traffic study is included as an appendix, and is relied upon in certain DEIR assessments, including the assessments of air quality, energy, noise, and transportation impacts. It is unclear whether these impact assessments use as inputs the traffic study's analysis of current conditions, projected future conditions, or projected future conditions with "mitigation" from the study's recommended delay-reducing

infrastructure changes. Public statements from county staff since the release of the DEIR have asserted that the traffic study's recommended infrastructure changes are not part of the CEQA "project" and are not analyzed in the DEIR, but other public statements have strongly implied that the county intends to construct these changes at some point.

If the county intends to construct the traffic study's recommended infrastructure changes, then they are clearly part of the "project" for CEQA purposes. CEQA defines a project as the whole of an action with the potential for either a direct physical change in the environment, or a reasonably foreseeable indirect physical change. The traffic study's recommended infrastructure changes would clearly be a direct result of the development of the Town Center pursuant to the Zoning Amendment. The county must therefore either clearly commit not to construct the traffic study's recommended infrastructure changes, or must assess them in the EIR. Planning to construct the changes but putting off analysis to a future time would be a clear case of prohibited CEQA "piecemealing."

We strongly urge the county to take the option of committing not to construct those changes, because they work contrary to the objectives of the project. Stated objectives include designing Central Avenue to "ease pedestrian and bicycle traffic, including traffic calming measures" and designing "intersections and streets within the Town Center to facilitate pedestrian movement, provide bicycle connections to commercial areas and transit stops" (p.4-10 et seq.). Reducing congestion by definition results in increased vehicular speeds, the opposite of traffic calming. Furthermore, the specific changes recommended by the traffic study all pose some level of increased risk to bicycle and pedestrian travel:

- The traffic study recommends intersection signalizations and roundabouts as congestion relief measures. However, safely accommodating bicyclists and pedestrians at roundabouts requires features like pedestrian hybrid beacons, and safely accommodating these users at signalized intersections requires features like bike turn boxes, "no right on red" rules, and longer crossing times for pedestrians—all features which are likely to increase vehicular delay. If signalized intersections or roundabouts are designed to minimize vehicular delay, therefore, they will not have such features and will not be safe for bicyclists and pedestrians.
- The traffic study recommends turn pockets and slip lanes at several intersections. Turn pockets increase pedestrian crossing distance and require additional mixing zones between bicycle and car/truck traffic. Slip lanes have all of these effects as well as increasing turning speeds and decreasing driver attentiveness. Both features, while they decrease vehicular delay, are inherently dangerous for bicyclists and pedestrians.¹

¹ See for example Jiang et al. 2020, Impact of right-turn channelization on pedestrian safety at signalized intersections, *Accident Analysis & Prevention* 136: <https://www.sciencedirect.com/science/article/abs/pii/S0001457519308802>.

- The traffic study recommends ending the Central Avenue lane reduction north of Heartwood Drive in order to increase vehicular capacity to the south. In contrast, CRTP supports—and many McKinleyville residents advocated for—the eventual continuation of the lane reduction throughout McKinleyville. The current street design results in higher-speed traffic and longer pedestrian crossing distances with less safe bike infrastructure, and any limitation on the lane reduction will allow these impacts to continue.

These recommended infrastructure changes result partly from the fact that the traffic study does not consider bicycle, pedestrian or transit LOS, Quality of Service, or level of traffic stress (LTS)—only vehicular LOS. If other modes of transportation had been considered, it would have been noted, for example, that pedestrians already often have to wait through more than one full signal cycle at signalized intersections on Central Avenue, a condition which if applied to vehicles would result in LOS F.

In fact, in adopting a target vehicular LOS, the county's General Plan Policy C-P5 also states that "Level of Service improvements for automobiles should not adversely affect Level of Service and/or Quality of Service for other modes of transportation, if possible," a standard not met by the traffic study's proposed changes. Even the traffic study itself recommends changing county policy to allow more vehicular delay in the Town Center area, to improve safety and create a more pedestrian-friendly environment (see p.18).

We therefore again strongly urge the county to commit in the EIR *not* to construct the infrastructure changes recommended by the traffic study. However, if the county does intend to construct those changes, or fails to commit not to, then they are clearly part of the "project" for CEQA purposes, and their impacts must be analyzed. These impacts are different in nature than those already analyzed in the DEIR, necessitating substantial changes to the document. For example, CEQA guidance is clear that "Building new roadways, adding roadway capacity in congested areas, or adding roadway capacity to areas where congestion is expected in the future, typically induces additional vehicle travel."² Therefore, if these capacity-increasing changes are included in the Town Center project, the EIR's vehicle miles traveled (VMT) assessment must be revisited, as the projects are likely to induce additional VMT. Furthermore, in light of the safety hazards discussed above, the EIR would also have to revisit its assessment of whether, per the CEQA Guidelines Checklist, the project would "substantially increase [transportation] hazards due to a design feature" or "decrease the performance or safety of [bicycle and pedestrian] facilities."

Finally, we note that the traffic study itself is flawed in the following ways:

² Governor's Office of Planning and Research. April 2018. Technical Advisory on Evaluation Transportation Impacts in CEQA. See https://lci.ca.gov/docs/20180416-743_Technical_Advisory_4.16.18.pdf.

- The study states that traffic volumes “were assigned to project area roadways based on existing travel patterns.” Existing travel patterns will clearly change as the Town Center project is built out, so this assumption is fundamentally flawed.
- The study uses the Humboldt County Travel Demand Model to estimate trip generation, but such models are notoriously bad at accounting for factors such as induced travel or travel evaporation,³ both core features of transportation behavior related to changing land use and infrastructure. The study appears not to include any consideration, for example, of planned public transit improvements or transportation demand management measures included in the Town Center Zoning Amendments. In fact, the study admits that the model is “somewhat insensitive to roadway design and context” (p.8).
- The study analyzes only peak hour vehicular traffic, meaning that any proposed changes are focused on temporary vehicular delays occurring during a very small period of time on any given weekday. The study does not assess traffic conditions at any other times in order to offer other possibilities for prioritizing infrastructure investments.

2. The vehicle miles traveled (VMT) analysis in the DEIR is not credible.

The DEIR relies on the Humboldt County Travel Demand Model to assess VMT impacts. As noted above, such models are known to fail when it comes to predicting induced travel and travel evaporation in response to changes in vehicular capacity and other infrastructure and/or land use changes. Furthermore, the result of the VMT analysis—asserting that the per capita VMT in the Town Center would be 3.3 (less than 20% of the countywide average) and the per employee VMT would be 2.2 (15% of the countywide average)—are extremely dubious.

It is patently clear that per capita VMT varies significantly in different areas of the county. Research generally finds that VMT is lower in both more densely developed areas, areas with a mix of uses, and near town or city centers,⁴ all of which would suggest that the county’s lowest VMT would be found near downtown Eureka. It is also without doubt that future McKinleyville Town Center development will have lower VMT than the countywide average, given the plan for higher density and a mixture of uses in the Town Center. However, a five- to six-fold difference in per capita VMT between the Town Center and the countywide average strains credulity.⁵

³ See for example Volker et al., 2020, Induced travel in the environmental review process, Transportation Research Record: <https://journals.sagepub.com/doi/10.1177/0361198120923365>. Excerpt: “...travel demand models do not typically include all of the feedback loops necessary to accurately predict the induced travel effect.”

⁴ See for example Buehler, 2011, Determinants of transport mode choice: a comparison of Germany and the USA, Journal of Transport Geography 19: <https://citeseerx.ist.psu.edu/document?repid=rep1&type=pdf&doi=47c58200b85b7f5a3db2b879cf75b52c4c8e0055>.

⁵ For comparison, a recent national analysis found a difference of about 37% in per capita VMT between core urban counties and completely rural counties in the US. Ngo et al., 2024, The impact of urban form on the relationship between vehicle miles traveled and air pollution, Transportation Research Interdisciplinary Perspectives 28: <https://www.sciencedirect.com/science/article/pii/S2590198224002744>.

Another recent document produced for the county, the Humboldt County VMT Study by Fehr & Peers, used commercial mobile phone location data to estimate VMT in different parts of the county, and found a range of residential per capita VMT from 13.7 in Eureka up to 27.9 in Ferndale. While the data used for the Fehr & Peers study, like the travel demand model, also suffer from limitations and weaknesses, and direct comparisons would be inadvisable, the result of the Fehr & Peers study seems somewhat more credible than the DEIR's results.

Furthermore, we object to the use of the countywide average as the baseline for VMT analysis. As both the DEIR and the Fehr & Peers study show, and as suggested by a large body of academic research, there is significant variation in per capita VMT in different parts of the county with different development patterns. A countywide average that combines such widely varying numbers results in a relatively meaningless figure. A more defensible approach would be to compare future Town Center VMT with current VMT in the McKinleyville area, not the countywide average.

Finally, since the VMT assessment was also the basis for the DEIR's greenhouse gas (GHG) impact assessment, the GHG assessment must also be revisited.

3. The DEIR's noise impact analysis must consider traffic calming as a mitigation measure, but must rule out building setbacks as mitigation.

The DEIR concludes that the project's noise impact on sensitive receptors on Railroad Drive will be significant and unavoidable (Impact 11-2), as well as cumulatively significant and unavoidable (p.18-16). The conclusion that the impact is unavoidable relies on an assertion that there are no feasible mitigation measures which could reduce the impact below the level of significance. However, the DEIR considers only three kinds of mitigation measure: soundwalls, "quieter" paving materials, and extra insulation (p.11-20). This analysis fails to consider one of the most effective potential mitigation measures: traffic calming.

Road noise is typically dominated by the noise of tires on pavement, which is proportional to the speed of traffic.⁶ Slower traffic produces significantly less noise. Road design features which reduce vehicle speeds are well known and certainly feasible on Railroad Drive. Therefore, the DEIR must require traffic calming on Railroad Drive as a mitigation measure for significant noise impacts. Traffic calming should also be incorporated into the required mitigation for Impact 11-3, traffic noise impacts to future sensitive receptors on Central Avenue.

Additionally, the DEIR suggests building setbacks as mitigation measures for noise Impacts 11-3 and 11-4. However, building setbacks and frontages are specifically regulated in the Town Center Zoning Amendment. Additional setbacks would significantly modify the project by effectively reducing development density and pushing buildings away from the sidewalk, negatively impacting the pedestrian realm and creating a more car-dominated landscape. These

⁶ See for example: <https://environment.transportation.org/focus-areas/noise/noise-overview/>.

changes would undermine the project's objectives, which call for key features like "higher density housing," "a full range of commercial uses," "pedestrian-oriented neighborhoods and commercial areas," and "human-scale residential and commercial areas" (p.4-10 et seq.). Setbacks are therefore not an appropriate mitigation measure.

Finally, the DEIR's noise impact assessment is based on the traffic study, which as discussed above has significant flaws. It is unclear whether the noise assessment assumes the implementation of the infrastructure changes recommended by the traffic study (p.11-17), which would increase traffic capacity and speed, and therefore noise.

4. The county's CEQA tiering intentions must be clarified.

The DEIR states that future projects in "substantial compliance" with the Zoning Amendment will receive ministerial approval, and "no new CEQA documentation would be required" if the development capacity is consistent with the levels contemplated in the EIR (p.4-21). While "tiering" is allowed under CEQA, it "does not excuse the lead agency from adequately analyzing reasonably foreseeable significant environmental effects of the project."⁷ Tiered projects are not exempt from CEQA documentation, but rather their impacts may be subject to less scrutiny only if they have already been contemplated in the original EIR. It is certainly possible to envision future projects in the Town Center area which are consistent with the Zoning Amendment, or for which the Zoning Amendment is irrelevant, but which have specific impacts that are not foreseen or contemplated in this DEIR. The EIR should clarify that tiering does not exempt future projects from CEQA entirely, and that projects with impacts unforeseen in the present EIR are not subject to tiering.

5. The VMT, greenhouse gas (GHG), and air quality effects of parking policies should be acknowledged in the DEIR.

The DEIR acknowledges that the Zoning Amendment eliminates off-street parking requirements for non-residential uses (p.13-13). This is accurate. However, the Zoning Amendment also eliminates off-street parking requirements for residential uses, and in fact includes a maximum parking ratio for residential uses (see Section 5.1.2 of the Zoning Amendment).

The elimination of parking minimums and creation of new parking maximums, along with other parking reforms in the Zoning Amendment, are transportation demand measures which will likely reduce vehicular travel, since residential parking availability is strongly correlated with

⁷ CEQA Guidelines 15152(b)

mode choice.⁸ This effect should be considered in the DEIR's assessments of air quality PM-10 impacts (p.5-18), VMT impacts (p.5-22), and GHG impacts (p.9-16).

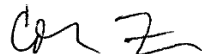
6. The DEIR's alternatives analysis is flawed.

The DEIR's statutorily required alternatives analysis considers an option of reduced density and intensity of development (Alternative 2), but does not consider an analysis of increased density. Increasing density—while further investing in pedestrian and bicycle infrastructure, improved transit service, and traffic calming—is a feasible option that would go even further toward accomplishing the project's objectives, and as such should be analyzed in the EIR.

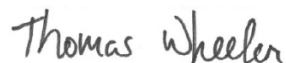
Furthermore, the analysis of Alternative 2—the only alternative considered aside from the No Project alternative—is deeply flawed. The DEIR asserts that Alternative 2 would reduce VMT, and therefore reduce impacts to transportation, air quality, and other related areas. However, as discussed above, the relevant transportation metric is VMT per capita, not overall VMT, and lower development densities are associated with higher per capita VMT. Thus, Alternative 2 would clearly increase transportation impacts, and likely impacts to air quality and other related areas. This fundamentally undermines the DEIR's claim that Alternative 2 is the Environmentally Superior Alternative.

Thank you for your consideration.

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
Environmental Protection Information Center (EPIC)
145 G Street, Suite A
Arcata, CA 95521
tom@wildcalifornia.org

⁸ See for example Millard-Ball and West, 2020, Residential parking supply has a stronger influence on household travel choices relative to a neighborhood's walkability and access to transit, Policy Brief: <https://escholarship.org/content/qt0nq3t3x3/qt0nq3t3x3.pdf>.