



July 22, 2026

Steven Lazar, Senior Planner
Humboldt County Planning and Building Department Current Planning Division
3015 H Street
Eureka, California 95501

via email: slazar@co.humboldt.ca.us

RE: CEQA Scoping Comments for “Project McKinley”

Dear Mr. Lazar:

We have reviewed the Notice of Preparation of an Environmental Impact Report (NOP) for the proposed Amazon distribution center in McKinleyville (“Project McKinley”). We submit the following CEQA scoping comments based on the NOP’s project description and other published information about the project.

Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) Impacts of New Shipping Volumes & Patterns

The “Project Description and Operations Plan” Memo from project proponent Sonya Kinz, dated October 3, 2025, states that the purpose of the project is to “power the ‘last mile’ of the occupant’s order process and help speed up deliveries.” Any changes in shipping volumes or patterns caused by the project are therefore inherent to the project, and the environmental impacts of such changes should be considered direct project impacts. Specifically:

- Faster delivery is one of the main drivers of climate pollution from online shopping, with published estimates ranging from 10% to 56% higher carbon emission from faster shipping.¹ The EIR must assess the increased GHG emissions per package caused by the faster shipping resulting from the project.
- Faster shipping leads to more orders² and more returns,³ both of which mean more packages shipped. Thus, if the project increases shipping speeds, it will mean not only higher carbon emissions per package, but also more shipped packages. The EIR must

¹ Diab, A. December 23, 2025. Fast shipping is increasing emissions. Here’s why delivery has become more pollution. Associated Press. <https://apnews.com/article/climate-online-shopping-expedited-shipping-fulfillment-center-e809c3508a15033f4707dc2abbb6de69>.

² Fisher, M.L., S. Gallino, and J. Jiaqi Xu. 2019. The value of rapid delivery in omnichannel retailing. Journal of Marketing Research 56 (5). <https://journals.sagepub.com/doi/10.1177/0022243719849940>.

³ Masuch, A., J.R. Landwehr, C.M. Flath, and Frédéric Thiesse. 2024. The faster the better? The impact of short delivery times on product returns in online shopping. Journal of Retailing 100(3): 475-485. <https://www.sciencedirect.com/science/article/pii/S0022435924000393>.

assess the increased VMT and increased GHG emissions caused by the increased package shipments resulting from the project.

- Increased Amazon sales suggests a likely decrease in shopping at local retailers in Humboldt County. The EIR must analyze the increased VMT and increased GHG emissions caused by Amazon purchases which displace local purchases which could otherwise be accessed by transportation modes such as walking, biking, or riding the bus to a store.

The EIR must also assess the VMT impacts of employee commute trips, and should assume in the absence of effective mitigation that all employees will drive individually to work, given the inaccessibility of the project site by any mode other than a private automobile.

Transportation Safety Impacts

Per the “Project Description and Operations Plan” Memo, the project is projected to generate 828 daily trips during peak periods. Many of these will be heavy truck trips. The project is located in an area where most of the main transportation routes lack bike lanes or sidewalks, and there is no bicycle or pedestrian infrastructure leading to or from the project site. Furthermore, there are schools, homes, and other sensitive uses on many of the main routes leading to and from the site. The EIR must assess whether the project will increase safety hazards on streets in the vicinity of the site, including the impacts on vulnerable road users without safe infrastructure.

Water Quality and Salmonid Impacts

The NOP does not list hydrology or water quality as areas of potential significant impact, yet the project does pose the potential for significant water quality impacts. In particular, the project includes large paved parking lots which will result in polluted runoff which may not be fully remediated by on-site stormwater detention and treatment systems. Runoff from the site drains to the Mad River estuary, which supports Coho Salmon and other protected fish species. We are particularly concerned about tire particles that can result in exposure of aquatic life to 6PPD-Quinone, an extremely toxic breakdown product of the tire additive 6PPD.

6PPD-Quinone (“6PPD-Q”) was discovered in 2020 to be particularly toxic to juvenile and adult Coho Salmon. Scientists isolated this contaminant from stormwater runoff that was causing “Urban Runoff Mortality Syndrome” in the Puget Sound watershed, where adult Coho Salmon often die before spawning in areas with high concentrations of road runoff. In April 2025, Humboldt Waterkeeper collected stormwater samples from two large commercial parking lots near Humboldt Bay, including the Target and Costco parking lots in Eureka. These samples were collected after 0.28 inches of rain following three days with no rain, and contained 430 and 340 ng/L 6PPD-Q respectively—30 to 40 times the U.S. EPA’s Acute Aquatic Life Screening Value for 6PPD-quinone in freshwater.⁴

⁴ U.S. Environmental Protection Agency, Office of Water, Health and Ecological Criteria Division. May 2024. Acute Aquatic Life Screening Value for 6PPD-quinone in Freshwater. EPA-822-R- 24004. <https://www.epa.gov/system/files/documents/2024-05/6ppd-q-screening-value- 2024.pdf>.

Humboldt Waterkeeper's pilot study⁵ involved just two grab samples from these parking lots, but it is clear from numerous studies over the past five years that 6PPD-Q is present at harmful levels in surface waters that support Coho Salmon. While we understand that the project will be required to install stormwater detention and treatment systems, these must be designed to treat 6PPD-Q as well as metals, oil and grease, and other pollutants typical of large areas of pavement, including monitoring and maintenance to ensure that these systems remain properly functioning over the life of the project.

The EIR must analyze the project's impacts on water quality, including 6PPD-Q, as well as resulting impacts on Coho Salmon and other aquatic life.

Thank you for your consideration of our comments.

Sincerely,

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⁵ Wiyot Tribe Shawir Darrudaluduk and Humboldt Waterkeeper. 2026. 6PPD-Quinone in Urban Streams of Humboldt Bay, Lower Eel River, and Mad River Watersheds (Humboldt County, California). <https://www.humboldtwaterkeeper.org/programs/water-quality/2004-6ppd-quinone-in-urban-streams-of-humboldt-bay-lower-eel-river-and-mad-river-watersheds>.