

From: [CINDEE GRACE](#)
To: [Planning Clerk](#)
Subject: Fix the VMT Plan!
Date: Wednesday, August 19, 2020 4:23:51 PM

As your constituent and a health professional, I urge you to fix the VMT Plan. Protect our environment!

Dr. Cindee Grace of Eureka

From: [Glen Colwell](#)
To: [Planning Clerk](#)
Subject: Re: Thresholds of Significance for Vehicle Miles Traveled (VMT) to evaluate environmental impacts of projects
Date: Wednesday, August 19, 2020 9:30:39 AM

I stand with Humboldt Bay Keeper's objections to the County's proposed approach to VMT accounting.

Countywide Averages Are Irrelevant in Urbanized Areas.

Do the right thing and assess transportation impacts honestly!

Respectfully
Glen Colwell
Arcata

From: [g](#)
To: [Planning Clerk](#)
Subject: Re: Thresholds of Significance for Vehicle Miles Traveled (VMT) to evaluate environmental impacts of projects
Date: Tuesday, August 18, 2020 5:58:48 PM

Re: Thresholds of Significance for Vehicle Miles Traveled (VMT) to evaluate environmental impacts of projects.

To Whom it May Concern,

Please do not avoid the new requirements regarding your assessment of transportation on the impact of projects undergoing environmental review. You must not screen out almost all projects but assess VMT impacts honestly. The proposed plan that the county will be considering on August 20, would compare driving levels for new projects in developed areas with county wide averages instead of driving levels in the local community. That effectively means that a new residential subdivision with a slightly higher population, would likely be deemed to have no significant impact on driving simply because people would drive less than people in more rural places. That is simply dishonest.

Please revise the maps and use reasonable thresholds for comparison.

Sincerely,

Gisèle Albertine
P.O. Box 662
Arcata, CA 95518

From: [ja savage](#)
To: [Planning Clerk](#)
Subject: Re: Thresholds of Significance for Vehicle Miles Traveled (VMT) to evaluate environmental impacts of projects
Date: Tuesday, August 18, 2020 4:43:26 PM

August 18, 2020

Re: No 'There' There In Your Proposal

Dear Planner:

It appears to be your position that new developments, such as the ones enumerated in Exhibit A (1), are so trivial as to not affect traffic, pollution, and livable, thriving neighborhoods.

How can that be?

Increased transportation from subdivisions, offices, and small commercial developments most certainly affects our environmental and quality-of-life.

I spent the last several months searching for housing - moving from a rural area where all services were farther than walking distance - to a more urban area. One of my top concerns was that my new home be close enough not to engender too much driving. I selfishly do not want to waste time behind the wheel. I would rather not hear traffic where I sleep and work. I don't want to breathe fumes. I DO want to live in a neighborhood that has services, markets, and a sense of place. Humboldt should strive to have a soul, a "there" wherever new development is being planned. The opposite of Gertrude Stein's quip about being no "'there' there" in Oakland.

Your proposed CEQA (non) compliance is as if such concerns are so trivial as to be swatted out of the air like a pesky fly.

Create more thriving communities by making them so vehicles are not an absolute necessity in order to live 'there.'

Sincerely,
J.A. Savage
Eureka, CA 95501
707 672 5665
jasavagehonest@gmail.com

From: [Jess O](#)
To: [Planning Clerk](#)
Subject: Re: Thresholds of Significance for Vehicle Miles Traveled (VMT) to evaluate environmental impacts of projects
Date: Tuesday, August 18, 2020 4:58:23 PM

Hi everyone,

I'm very uncomfortable with the county "screening out" the real driving impacts of new development in Humboldt.

We do need growth, but we need to mitigate it and make sure there are improved alternatives to driving such as biking paths and walking space.

Please follow the CA directive and ensure that all new development comes with appropriate bike paths, parks, natural space and improved creek access.

Thanks,

Jess O'Brien
Arcata, CA

From: [Daniel Chandler](#)
To: [Planning Clerk](#)
Subject: Fix the VMT Plan!
Date: Monday, August 17, 2020 9:20:11 AM

Dear Planning Commissioners.

County staff admit that their new Vehicle Miles Traveled proposed policy is flawed. It should never have come to you, even under the guise of “education.” Send it back to fix it.

Thank you,

Dan Chandler

Daniel Chandler
436 Old Wagon Road
Trinidad, CA 95570
dwchandl@suddenlink.net
Phone: 707 677 3359
Mobile: 707 601 6127

From: [Lorna Nys](#)
To: [Planning Clerk](#)
Subject: Re: Thresholds of Significance for Vehicle Miles Traveled (VMT) to evaluate environmental impacts of projects
Date: Tuesday, August 18, 2020 4:22:22 PM

No. No. No.

This would be a huge mistake that could negatively effect fisheries forever!

We do not need to accept degration of our environment to profiteering!!!!

I am a 40 year resident and have raised a family here.

Please do not allow this travesty to occur!

From: [Ramon Hooper](#)
To: [Planning Clerk](#)
Subject: Fix the VMT Plan!
Date: Monday, August 17, 2020 12:05:40 PM

The residents of your county mustn't be forgotten they live in the county also.

Sent from my iPad

From: [kathleenkelcey](#)
To: [Planning Clerk](#)
Subject: Re: Thresholds of Significance for Vehicle Miles Traveled (VMT) to evaluate environmental impacts of projects
Date: Tuesday, August 18, 2020 9:22:01 PM

Sent from Samsung tablet

From: marthawalden@suddenlink.net
To: [Planning Clerk](#)
Subject: Fix the VMT Plan!
Date: Monday, August 17, 2020 9:03:17 PM

If I'm reading your residential project screening map correctly, no one on the planning commission anticipates that proposed subdivisions in the Kneeland area and the Phillippsville area will increase vehicle miles traveled. How could this be? Has Phillippsville become a center of employment? Is there bus service to Kneeland?

The state requirement to reduce VMT poses quite a challenge for a rural county such as Humboldt. However, the need to do so is not only legitimate but pressing. The planning commission must grapple with this problem instead of pretending it doesn't exist. The developers and the county must work together toward a solution more creative than maps that don't relay accurate information.

Martha Walden

Sent from Windows Mail

From: [Cathy ChandlerKlein](#)
To: [Planning Clerk](#)
Subject: Fix the VMT Plan!
Date: Monday, August 17, 2020 9:16:36 AM

As a Humboldt County Resident, I am requesting that the VMT Plan be addressed fairly and honestly and revised to reflect real emissions generated by actual driving distances. Driving is the main source of carbon emissions and a key driver of climate change which will kill us all if not addressed vigorously now. Please take this seriously. Thank you.

Cathy Chandler-Klein
1070 12th St
Arcata, CA

From: [kathleenkelcey](#)
To: [Planning Clerk](#)
Subject: Re: Thresholds of Significance for Vehicle Miles Traveled (VMT) to evaluate environmental impacts of projects
Date: Tuesday, August 18, 2020 9:23:45 PM

Make no changes but allow honest accounting of miles.

Kathleen kelcey
1090 murray rd space 45
Mckinleyville, CA 95519

Sent from Samsung tablet

From: [Meg Stofsky](#)
To: [Planning Clerk](#)
Subject: Re: Thresholds of Significance for Vehicle Miles Traveled (VMT) to evaluate environmental impacts of projects
Date: Tuesday, August 18, 2020 11:12:44 PM

Dear Planning Commission:
Humboldt County must assess VMT impacts and mitigations honestly, not develop a work around!

Under the County's proposed new rules every new house, apartment building or residential subdivision in much of the County would be assumed to generate little driving, and therefore "screened out."

The county's plan would also compare driving levels for new projects in developed areas with countywide averages instead of driving levels in the local community. That effectively means that a new residential subdivision such as what is proposed in Cutten, for example, would probably be deemed to have no significant impact on driving simply because people would probably drive less than people in rural places like Miranda or Orick. That is not a fair way to assess and will lead to increased traffic, therefore increased pollution! Please do not allow this plan to go forward.

Sincerely,
Margaret Stofsky
Eureka, CA 95503

From: [Mary Hurley](#)
To: [Planning Clerk](#)
Subject: Re: Thresholds of Significance for Vehicle Miles Traveled (VMT) to evaluate environmental impacts of projects
Date: Wednesday, August 19, 2020 6:15:47 AM

The Planning Commission is meeting on August 20 to review the VMT requirements to comply with CA State requirements as part of Humboldt County's future planning process for VMT impact on growth.

I urge the Planning Commission to reconsider Humboldt County's proposed rules to screen out new housing and residential subdivision impact on these new State requirements as having "little impact." To avoid planning for transportation needs and impacts on growth in Humboldt County is shortsighted and negligent.

Our community responsibilities for planning is more important than ever given climate change and the impacts of sea level rise in our County. We need to plan for better, greener transportation systems that will serve an aging population which represents a larger proportion of our population. This is challenging in a rural county but we must take responsibility for planning that includes transportation impacts to serve everyone.

Thank you for submitting my comment.

Mary Hurley
hurleymch@gmail.com

From: [Eugene Perricelli](#)
To: [Planning Clerk](#)
Subject: Re: Thresholds of Significance for Vehicle Miles Traveled (VMT) to evaluate environmental impacts of projects
Date: Tuesday, August 18, 2020 4:22:00 PM

A failure to take into account the actual traffic generated by ANY and ALL new development is a failure to think of and plan for and protect future generations. Climate change DEMANDS that we stop acting like spoiled babies and admit the actual impacts of our decisions. Then mitigate them.

Thank you for listening. Claire Perricelli, Eureka

From: [J Taylor](#)
To: [Planning Clerk](#)
Subject: Vehicle Miles Traveled (VMT) improperly assessed
Date: Wednesday, August 19, 2020 8:52:54 AM

Hello County Supervisors,

Please use correct and ACCURATE math and methods in Environment
Assessment of new building.
No other way to do this; quite your Trumpian methods.
Seriously,

Jennifer F Taylor, PhD
Arcata, CA

--

"Be the change you wish to see in the world" Mahatma Gandhi

From: [sue](#)
To: [Planning Clerk](#)
Subject: vehicle miles traveled rules
Date: Tuesday, August 18, 2020 5:35:05 PM

Thank you for working on figuring out how to consider the vehicular impact of developments in our county. As you know, in a rural county like ours transportation is a big part of our greenhouse gas emissions, and reducing travel distances could really help reduce our impact. However, I believe that the current proposal has some significant problems and I hope you will modify it so it will actually serve its intended purpose.

Issues and changes needed are well-described in the letter you have already received from a number of local environmental groups. The most important have to do with the categorical exemptions in the proposed plan. For instance, stores much less than 50,000 square feet can draw customers from all over the county--it would be more reasonable to set a smaller limit and then look at the actual proposal, where it is and what they'll be doing, to see if it will increase or decrease miles driven. Similarly, vehicle miles used for comparison should be for the specific area where the project is, not county averages. (and I strongly support using medians not averages, which are heavily affected by a few long trips). I could try to restate the whole letter, but I trust that you can hear the message, which is that it's important to do this right, for the future of our county and the planet. Please look again at the proposal and amend it so that it can actually do what it's supposed to do.

Sue Hilton

Arcata

From: [Nancy Ihara](#)
To: [Planning Clerk](#)
Subject: Planning Commission Meeting Agenda Item #3
Date: Tuesday, August 18, 2020 12:53:22 PM

Dear Commissioners,

I would like to comment briefly on Item #3, Thresholds of Significance for VMT to evaluate environmental impact, of the Thursday, August 20th meeting agenda.

The Planning Department staff has taken state guidelines appropriate for urban areas and applied them to Humboldt County with the result that huge areas of the county are designated as being within the Threshold of Significance for VMT.

We are facing a climate catastrophe and we must do all that we can to reduce greenhouse gas emissions. The transportation sector accounts for over 50% of our emissions. The Commission must adopt guidelines which address this issue by assessing VMT impact realistically and honestly.

I urge the Commissioners to reject the plan as submitted and that staff be directed to create a plan which will do much more to reduce VMTs.

Sincerely,

Nancy Ihara
231 Dean St., Manila

From: gkclark@reninet.com
To: [Planning Clerk](#)
Subject: Tonight's 6:30 Public Hearing 08-20-20
Date: Thursday, August 20, 2020 1:01:19 PM

Please include my comment to the commissioners for tonight's hearing

Honorable Commissioners:

Please refrain from using county averages to calculate Vehicle Miles Traveled in response to the proposed Transportation Analysis Process for implementing new CEQUA Guidelines based on Senate Bill 743.

These averages should be calculated using local traffic statistics.

For example, I live near Cutten and the current traffic situation on Walnut Drive is like a "funeral procession" twice during weekdays. Traffic at Safeway is periodically backed-up all the way to the Redwood Acres Fairgrounds, and yet, another influential developer has cleared many acres of Redwoods at the "McKay Tract" anticipating "rubber-stamped" approval for another large subdivision promising to have further disastrous impacts in an area already being impacted beyond capacity for public safety. This is the primary access point for emergency vehicles serving Humboldt County's largest hospital, physician offices, pharmacies, assisted living facilities, and urgent care providers.

Thank you for consideration of my community's safety.

**George Clark
1091 Vista Drive
Eureka**

707-443-3555

From: [Pat Kanzler](#)
To: [Planning Clerk](#)
Subject: Re: Thresholds of Significance for Vehicle Miles Traveled (VMT) to evaluate environmental impacts of projects
Date: Tuesday, August 18, 2020 6:47:26 PM

Assess VMT impacts honestly by revising the maps and use reasonable thresholds for comparison; do not disallow VMT.

Pat Kanzler, RN
Eureka, Ca 95503



August 13, 2020

Humboldt County Planning Commission
3015 H Street
Eureka, CA 95501

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

Commissioners:

Thank you for the opportunity to comment on the proposed Transportation Analysis Process for implementing new CEQA Guidelines based on Senate Bill (SB) 743. As you know, the new process will require transportation impacts to be measured in terms of vehicle miles traveled (VMT) rather than vehicular congestion or level of service (LOS), as has been the common practice in the past. We strongly support the state's move to VMT for transportation impact analysis under CEQA, and we want to ensure that the County's implementation plan is effective and accomplishes the state's aims. If done well, VMT assessment will help us do our part as a coastal county threatened by extremely high rates of sea level rise to reduce greenhouse gas emissions, and help us combat the crisis of traffic injuries and deaths in our communities. Unfortunately, the proposed VMT screening criteria and thresholds will be neither effective nor defensible without substantial revisions.

Trips and Miles Are Not Interchangeable

The screening criteria based on a specific number of projected trips per day—for “small projects” both inside and outside of Urban Services Areas—are not appropriate. We appreciate that these are derived from suggestions in the VMT Technical Advisory released by the Governor's Office of Planning and Research (OPR). However, these statewide recommendations don't apply very well to our area. Humboldt County's development patterns are extremely heterogeneous, ranging from dense urban form to extremely rural. That means there is extreme variability in trip lengths. In other words, using trips as a proxy for is VMT highly problematic, even when urban service boundaries are factored into the analysis. In fact, Appendix 1 of the Advisory makes it clear that a "trip-based" approach to assessing VMT means measuring VMT from predicted trips, not replacing a VMT analysis with a trip analysis. In a nod to areas like ours, the Advisory notes that "clustered small towns and small town main streets may have substantial VMT benefits compared to isolated rural development." That is certainly true here and should be reflected in the screening criteria.

Smaller Stores Can Generate Long Trips in Humboldt County

The suggestion that any store smaller than 50,000 square feet should be automatically considered to generate less-than-significant VMT is not defensible. We recognize that the VMT Technical Advisory suggested 50,000 square feet as a threshold for "regional-serving" retail. However, this was suggested as a consideration in VMT analysis, not as an initial screening criterion. The Technical Advisory further states that "lead agencies will best understand their own communities" and should assess projects accordingly, rather than applying a one-size-fits-all approach. The county should recognize that the



50,000 square foot threshold is meant for retailers in areas with much larger populations than ours. While "big box" stores this size certainly do have a big catchment area, a store does not have to be a big box to have a large catchment area. In Humboldt County, a much smaller store than that can draw customers from around the entire region.

Projects in Remote Areas Generate Greater VMT

The screening maps for "Low VMT" areas defy common sense and good planning practice. The residential map appears to identify practically all parts of the county where people actually live as "Low VMT," and the commercial map covers most areas where commercial facilities are or could be built, however rural or remote. No defensible screening tool would screen out residential or commercial projects in areas like Carlotta or Kneeland or Weitchpec, for example, by assuming they won't generate much driving. Yet all these areas and many other remote spots would be screened out by the currently proposed maps. The proposed Process does not identify the threshold used to identify these areas, but it is clear that either the threshold is unreasonably high or the data used to generate the maps are fatally flawed.

Countywide Averages Are Irrelevant in Urbanized Areas

We strongly object to using countywide VMT averages as the basis for all significance thresholds. Countywide averages are undoubtedly skewed by extremely high VMT for a relatively small number of people living in the more remote areas. For that reason, the countywide average makes sense as a basis for calculating the threshold for more rural areas, but not for urbanized areas. The only procedure that makes sense for more urban areas is comparing the project's VMT to VMT in the community where it's located. For example, a project in Cutten or Myrtle town should be compared to Eureka area VMT, and a project in Bayside should be compared to Arcata area VMT.

For the same reason, the proposed procedure for determining the significance of VMT from commercial cannabis operations is indefensible. Comparing projects in urbanized areas to the countywide average, while comparing projects in non-urbanized areas to the average in the local community is exactly the opposite of the approach dictated by data and logic.

To further reduce the influence of outliers on the data, it would be advisable to use medians rather than averages when developing thresholds for urbanized areas.

Relative Location Matters

The proposed Process cites evidence that affordable housing near employment centers produces low VMT. We agree. However, the screening criterion proposed does not take proximity to employment centers into account. Particularly in a region like ours, location of affordable housing is key, and projects cannot be screened out if they're distant from employment centers.

Similarly, the commercial cannabis cultivation screening criterion must be modified to include location relative to services, in addition to on-site housing. On-site housing on its own is not sufficient to assume less-than-significant VMT, because home-work trips are not the only trips employees will make.



People and Households Are Not the Same Thing

Throughout the proposed Process document, household VMT and per capita VMT seem to be used interchangeably, despite the fact that many individuals can live in a single household. The significance threshold for residential projects says it is based on per resident VMT, for example, but the average and threshold proposed for comparison is measured per household. Using household data as the basis for calculating per capita VMT impact thresholds is an error which, if uncorrected, will drastically underestimate impacts.

The County Requires Too Much Parking to Assume Low VMT

The proposed Process is correct in concluding that providing abundant parking will encourage driving even for a project near a major transit stop. However, it is incorrect in concluding that meeting but not exceeding the county's parking requirements is evidence that parking is not abundant and that a project can therefore be screened out of further transportation impact analysis. The county's parking requirements are premised on the assumption that all land uses are primarily vehicle-serving, and meeting them provides more than enough parking spaces to encourage driving. Either the parking requirements should be lowered or the screening criterion should require a variance to provide fewer parking spaces than the code otherwise requires.

Thank you for considering our comments.

Sincerely,

Colin Fiske, Executive Director
Coalition for Responsible Transportation Priorities
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Arcata, CA 95521
colin@transportationpriorities.org

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