

McClenagan, Laura

From: Colin Fiske <colin.fiske@gmail.com>
Sent: Monday, January 03, 2022 11:19 AM
To: Planning Clerk
Cc: Wilson, Mike
Subject: North McKay Ranch Project, 1/6/22 Agenda Item F.1

Planning Commissioners,

I am writing with very serious concerns about the North McKay Ranch project, Item F.1 on your agenda this week. As we have detailed in several letters included in the project record, this project as currently proposed will clearly result in significant increases in vehicle miles traveled (VMT) and greenhouse gas (GHG) emissions, and consequently is inconsistent with the County's own General Plan. The staff report's claim that this project is "infill" which will result in a "self-sustainable walkable neighborhood" is frankly a bit absurd.

And you don't have to take our word for it. Comment letters from HCAOG and from RCEA (both agencies on which a County Supervisor sits as a Director), as well as from Caltrans, say substantially the same, and explicitly lay out the need for increased density and meaningful pedestrian, bicycle and transit improvements in order to meet the requirements of CEQA as well as state and County goals and policies for transportation and climate mitigation. Unfortunately, County staff have chosen to dismiss all of these comments largely on technical grounds, ignoring the expertise of these key planning agencies (along with stakeholders like CRTP), claiming for themselves the sole right to interpret the General Plan and describing standard complete streets features as "infeasible."

The Final EIR also claims that they cannot reduce GHG emissions enough through transportation measures to avoid a significant impact, and therefore that mitigation measures should not be required. In fact, CEQA requires the adoption of all feasible mitigation measures when an impact is significant, and this requirement is not conditioned on those measures being able to reduce the impact below the level of significance.

The Final EIR further claims that many transportation mitigation measures would require cooperation with the City of Eureka, and therefore are infeasible. In fact, it is standard practice under CEQA to require a project proponent to receive approvals or permits from other agencies, and the County should do so here.

We take particular issue with the straw-man argument presented by staff that the Environmentally Superior Alternative is a reduced density project which will result in fewer housing units. In fact, as CRTP and other environmental advocates, along with expert agencies, have repeatedly said, one of the key steps needed to make a project in this location environmentally superior is to *increase* the density of housing and mixture of uses. As it currently stands, the project will likely not be dense enough to support any additional transit service, and included commercial uses will not be sufficient to substantially reduce trip generation rates.

Please listen to HCAOG, RCEA, and the community, and require the project to increase density, implement active transportation and transit improvements, and demonstrate that it will reduce VMT and GHGs in line with the targets established in the Regional Transportation Plan and Comprehensive Action Plan for Energy (and thus in the General Plan). If these actions are truly infeasible, then the project should be denied.

Thank you.

--

Colin Fiske (he/him)

Executive Director
Coalition for Responsible Transportation Priorities
www.transportationpriorities.org