

## California Department of Transportation

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1-HUM-101-74.7/79.4  
North McKay Ranch  
SCH# 2019049166

Mr. Desmond Johnston, Senior Planner  
Planning & Building Department  
County of Humboldt  
3015 H Street  
Eureka, CA 95501

Governor's Office of Planning & Research

**Dec 02 2021**

### STATE CLEARINGHOUSE

Dear Mr. Johnston:

Thank you for giving us the opportunity to comment on the Recirculated portions of the Draft Environmental Impact Report (RDEIR) for the proposed North McKay Ranch Major Subdivision, General Plan Amendment, and Zoning Ordinance Amendment. The proposed development consists of 320 residential units and two commercial units on seven (7) parcels, consisting of 81 acres. The proposed project is anticipated to be developed in nine phases over a period of 20 years, but a final phasing plan would be based on market conditions. Approximately 21.73 acres would remain as undeveloped open space that would be dedicated to the County for future trail management. The project is located in Humboldt County within the unincorporated community of Cutten. We have the following comments:

#### **Vehicle Miles Traveled**

We agree that due to the proximity of the project site in the Cutten area to job centers in Eureka, the Vehicle Miles Traveled (VMT) per resident is less than 15% below the regional average VMT and expected to have a less than significant impact on VMT reduction goals.

Caltrans has a responsibility to help California achieve a carbon-neutral future by the year 2045. The Caltrans Strategic Plan for 2020-2024 calls for Caltrans to enhance and connect the multimodal transportation network and to lead Climate Action. By the time the proposed subdivision is projected to be fully built, the State expects to be less than five years from reaching carbon neutrality. In anticipation of a future with lower carbon emissions and lower energy consumption, we offer the following considerations for incorporating more sustainable transportation measures and/or lower carbon standards into the design of the proposed subdivision.

#### **Land Use**

"Provide a safe and reliable transportation network that serves all people and respects the environment"

With respect to the proposed land use designation changes, we do not believe that the requested changes are adequate enough to influence the travel behavior of subdivision residents. The effects of individual land use factors on transportation tend to be cumulative. Areas that contain a combination of land use density, mix, connectivity, and walkability tend to have significantly lower overall per capita vehicle ownership and use, and higher use of alternative modes than average. The design of the proposed subdivision does not capitalize on its proximity to jobs and services by promoting travel modes that will help the State to achieve the current climate goals.

The subdivision will develop 59 acres with 320 dwelling units, resulting in a density of 5.4 dwelling units per acre. These numbers reflect single-family detached housing on both large and small lots as well as multifamily residential. While the numbers vary slightly according to source, low density residential uses range from 1 to 7 units per acre. Medium density residential uses range from 8 to 25 dwelling units per acre. To make transit a meaningful mode of transportation for subdivision residents, we recommend increasing the minimum average density for the subdivision to between 8 and 12 dwelling units per acre.

We encourage the County to allow mixed use (combined residential and commercial-use) buildings on the lots zoned for commercial use.

Because it is difficult to adapt a subdivision to meet climate action goals once it has been built, the County should evaluate where the existing County General Plan, zoning ordinances, and other planning codes can be adapted to incorporate the Climate Action Plan or other climate-oriented laws.

### **On Site Roadways**

The description of Arbutus and Redwood street extensions do not clearly state how the 68-foot cross-section will be delineated or utilized. Adequate right of way would appear to support two twelve-foot travel lanes, two five-foot bike lanes, two eight-foot parallel parking "lanes," two six-foot sidewalks, and two two-and-one-half-foot landscape strips. If trade-offs are needed to compromise on the design of the facility, we recommend that the extensions of Arbutus and Redwood prioritize the continuity of bike lanes over on-street parking and any turn lanes. Both sides of the street should have sidewalks present to ensure a continuous path of travel for pedestrians.

We encourage the development of alleys in compact, walkable residential districts, but with a narrower paved or graveled width (usually 10 to 12 feet) and an easement for utilities (usually 20 feet overall). In a residential grid, alleys should connect across blocks to make garbage pickup easier. In commercial areas, most communities that

have alleys require them to be at least 24 feet wide to allow dumpster access and deliveries.

The use of cul-de-sacs, such as Canyon Court and South Canyon Lane, reduces the connectivity of streets and creates more out of direction travel for bicyclists and pedestrians, resulting in a bias toward vehicular travel and impediments to bicycle and pedestrian travel.

Where not impeded by terrain, cul-de-sacs located at the periphery of the subdivision should allow for future connections to adjacent properties in order to maintain the continuity and connectivity of the road network for the proposed subdivision. We support the proposed future extension of Arbutus Street.

We support the proposal to include trails that will connect subdivision residents to pedestrian corridors that provide access to markets, jobs, and other services.

Some research indicates that people walk more and drive less in areas with traditional pedestrian-oriented commercial districts where building entrances connect directly to the sidewalk than in areas with automobile-oriented commercial strips where buildings are set back and separated from the street and sidewalk by parking lots. We encourage the County to require build-to-property-line standards for commercial and mixed-use buildings, rather than adhering to setback requirements that discourage pedestrian activity.

### **Parking**

Abundant, free parking encourages driving and helps create dispersed, automobile-dependent land use patterns. Parking Management can help shift automobile travel to alternative modes, and improves access by creating more clustered, multi-modal land use patterns. Parking Management strategies can significantly help to reduce traffic congestion, road and parking facility costs, vehicle emissions, and urban sprawl, and can increase the diversity of transportation modes.

Due to the low residential densities proposed, we encourage the County to limit the use of on-street parking and to prioritize the utilization of public rights of way for multiple modes of transportation, not parking.

Parking Management may be appropriate where:

- Smart Growth and Transit Oriented Development are desired.
- Higher density development is desired.
- Traffic congestion or vehicle emissions are significant problems.
- Excessive pavement is undesirable.

As the number of parking spaces per employee in a commercial center declines, use of alternative modes tends to increase. We recommend shared parking for commercial businesses and public and community facilities. We encourage the County to develop parking standards and guidance for parking management plans to limit the potential for over-supply.

The multi-family lots appear to offer two, or nearly two, parking spaces per dwelling unit, which results in large, unsecured, off-street parking areas. Ironically, these parking areas require landscaping (for more than five spaces) in an area just cleared of timber for the purpose of parking and is prioritized over the development of additional housing units.

Automobile travel tends to be sensitive to parking supply and price. By offering multi-family residents one free parking space per unit, additional parking can be provided for an additional fee or limited to available on-street parking.

Thank you for your effort to incorporate the above comments. Feel free to contact me for further assistance with the above comments at (707) 684-6879 or by email at: <jesse.robertson@dot.ca.gov>.

Sincerely,

*Jesse G. Robertson*

JESSE ROBERTSON  
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District 1 Caltrans

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