



June 23, 2022

John Ford
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McKinleyville Municipal Advisory Committee
c/o Clerk of the Board
County of Humboldt
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RE: Draft McKinleyville Town Center Ordinance

Dear Director Ford and McKinleyville Municipal Advisory Committee Members:

The Coalition for Responsible Transportation Priorities (CRTP) appreciates the opportunity to comment on the latest draft of the McKinleyville Town Center ordinance (“ordinance”), dated June 17, 2022. We recognize and appreciate both the extensive public process and the significant investment of staff time that have led to the development of the ordinance. We support many aspects of the current draft ordinance, including the designation of the majority of the Town Center for mixed uses and the focus on walkable and bikeable design and pedestrian-friendly street frontages. However, we also continue to have several concerns with the ordinance as currently drafted. All page numbers, section numbers and other references in these comments refer to the current draft ordinance, unless otherwise specified.

Summary of Key Points

Our detailed comments are below. Following is a summary of the key points:

- Multifamily housing and minimum residential densities should be restored to the allowed uses table for the Mixed Use zone area.
- Street Types 2 and 3 envision low-density neighborhoods inappropriate for a town center. Street Type 1 should be applied throughout the Town Center area.
- Vehicular parking mandates are overly restrictive, expensive, outdated, and enforce low densities and car dependency. They should not be applied in the Town Center.

- A Central Avenue road diet is critical to the success of the future Town Center.
- Minimum building heights throughout the Town Center should be no less than 3 stories, and maximum heights no less than 5 stories, with percentage-based block caps on height removed. These levels of density are required to ensure adequate housing production and encourage walkability.

Allowed Uses

We are concerned that multifamily housing was removed as a principally permitted use in the MU1 Mixed Use area between the previous draft ordinance and this one, along with the footnote specifying a minimum residential density of 16 dwelling units per acre (see the table entitled “MU1: Mixed Use (Urban)” beginning on p.3). We appreciate and support allowing and encouraging mixed commercial and residential projects with ground-floor retail. However, it is difficult to predict future demand for commercial space, and we believe that multifamily housing should be allowed as a stand-alone use as long as it meets the form-based design standards. Regardless of whether a commercial component is included or not, however, minimum residential density standards must be included in the ordinance to ensure adequate housing production as well as sufficient density to support walkability.

Street Types & Building Standards

The table beginning on p.5 of the draft ordinance specifies three street types with different allowed building frontages, design standards, and building heights. Street Type 1 is the most appropriate for a town center, as it requires pedestrian-oriented frontages and moderate building heights. Street Types 2 and 3 are not appropriate for a town center, and should be eliminated.

Street Type 2 is essentially the same as Type 1, with the following key exceptions: minimum and maximum building heights (1 story and 3 stories, respectively) are one story lower than for Type 1, and build-to line (BTL) percentages are significantly lower. While the majority of McKinleyville is and will likely remain single-story, low-density development, the entire reason for developing a town center is to create a higher density, more walkable core for the community. Single-story buildings are simply not appropriate here. Furthermore, a BTL percentage of 50% will create an environment where only half of buildings have pedestrian-friendly frontages, completely destroying the intended effect. BTLs are most effective when they are applied uniformly to all buildings on a block or street segment.

Street Type 3 is even less appropriate for a town center than Type 2. Type 3 specifically disallows most pedestrian-friendly frontages, allows only porch-type frontages typical of single-family homes, and requires setbacks instead of BTLs. Single-family homes are not even an allowed use in the Town Center, and setbacks enforce car-oriented low-density development inappropriate for this area.

Therefore, Street Types 2 and 3 should be eliminated from the ordinance, and Type 1 standards applied throughout the Town Center. We further request some additional modifications to the Type 1 standards under the heading of “Development Standards” below.

Finally, we note that Map 2 shows some future interior streets with no street type specified. We strongly support Director Ford's suggestion at the June 22, 2022 McKinleyville Municipal Advisory Committee meeting that these connections be developed primarily as bicycle and pedestrian rights-of-way rather than streets for cars and trucks.

Car Parking

As we have noted in the past, vehicular parking mandates dramatically increase the cost of construction and enforce a low-density, car-oriented development pattern. Such mandates are not appropriate for a town center area and should be eliminated from the ordinance. Section 5.2.2 should be modified to require no vehicular parking, and Section 5.2.1 should be modified to encourage shared parking whenever parking is provided (with no common ownership requirement, an additional onerous mandate added from the previous ordinance draft). We note that Arcata has not required parking for developments in its downtown area for many years, and recent zoning code reforms in Eureka have similarly eliminated most previously mandated downtown parking. We further note that AB 2097 is currently working its way through the state legislature with broad bipartisan support, and if enacted will prohibit the enforcement of most parking mandates within a half mile of major transit stops such as the one envisioned for the Town Center. Vehicular parking mandates are a thing of the past, particularly in town centers, and the ordinance should not include them.

Finally, Section 5.3(a) should be modified to specify that when parking is (voluntarily) provided, it should always be behind buildings, and never to the side. Parking beside buildings breaks up frontages and creates a "snaggle-tooth" effect which destroys the pedestrian-friendly environment the ordinance seeks to create.

Non-Vehicular Transportation

The draft ordinance provides two alternatives for Section 4.2.1.1: either leave Central Avenue as it is, or apply a road diet to make it into a "core component of the Town Center." The first alternative is simply not viable. Central Avenue in its current state represents the polar opposite of the walkable, mixed-use ideal envisioned for the Town Center, and will severely undermine the Town Center if allowed to remain in this condition. A road diet is imperative to slow traffic, improve safety and comfort for people walking, biking and rolling, and improve permeability across Central Avenue connecting the two halves of the Town Center.

We submit the following additional comments on design for non-vehicular transportation:

- We strongly support the requirement for an "enhanced transit facility" at Section 4.4. We recommend adding to the description of this facility a requirement to provide safe, comfortable, and weather-protected waiting space for transit riders. We also recommend removing the caveat requiring a park-and-ride facility only if grant funding is available. There is currently more than enough parking available in the McKinleyville Shopping Center lot to support a park-and-ride facility. Section 4.4 should specify that as long as these parking spaces continue to exist, a park-and-ride facility utilizing them will be included in the transit center.

- Exhibit 2 appears to show bicycle and pedestrian areas with no separation between them (although the sidewalk is ambiguously labeled “buffered”). Bicycles travel much faster than pedestrians, and this differential will only increase with greater adoption of e-bikes in the coming years. Therefore, it is critical that adequate separation is provided between bicycle and pedestrian facilities. Furthermore, the cross-section at Exhibit 2 raises the question of how pedestrians and particularly bicyclists will access destinations on the opposite side of the street. Street designs must include abundant safe opportunities for street crossings, including at mid-block locations.
- The previous draft ordinance included a Mid-Town Trail cross-section which we strongly supported for its demonstration of a safe, comfortable facility with separation between bicycle and pedestrian users. The cross-section has been removed from the current draft. We request that it be restored.
- We support the requirement to provide bicycle parking. Unlike car parking, bicycle parking is relatively cheap to provide and takes up little space. Section 5.2.3.2 should be modified to require at least one bike locker per residential unit. Additionally, Section 5.2.3.1 should be modified to reduce the distance between bike parking and the primary building entrance and to specify that a well-marked and comfortable pedestrian path must be provided between bike parking areas and building entrances. 100 feet may be too far from a building entrance for riders to even locate the parking, let alone feel encouraged to ride.
- As noted above, vehicular parking mandates should be eliminated. However, should these mandates remain, Section 5.2.3.1 should be modified to allow for substitution of bike for car parking at a 1:1 ratio, reflecting common transportation habits, rather than the strongly biased and unsupportable 5:1 ratio currently specified (solo driving is the norm, not 5 people per vehicle, and adults often carry children on bicycles). Furthermore, there should be no cap on the allowable substitution, and certainly not a cap as low as 10%, as there is no empirical evidence to support such a cap. We further note that Sections 5.2.3.1(c) and (d) are confusing and apparently contradictory as written.

Development Standards

As noted above, a certain level of density is required to ensure walkability in the Town Center. Therefore, Street Type 1 should be applied throughout the Town Center area, and the minimum and maximum building heights should be increased to 3 and 5, respectively. Even more importantly, the restriction found on p.11 that “no more than 50% of buildings within any block” may meet the maximum height must be removed. This arbitrary and unnecessary requirement will drastically limit both walkable density and needed housing production. The included building height articulation requirements already achieve the desired design goal and should eliminate any perceived need for this damaging provision.

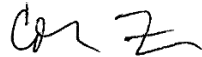
We also request the removal of all setbacks from the ordinance. Setbacks enforce low-density, car-dependent development. Thankfully, the only significant setbacks in the current draft (outside of Street Type 3) are rear setbacks, and there is no apparent public purpose for requiring these.

Side BTLs are included in the ordinance specifically for corner lots, where there are two frontages for one building. This approach is not reasonable. Both of the frontages should be treated as what they are—frontages—rather than arbitrarily defining one as a “side” and applying different standards. In fact, this is somewhat supported in the current draft with the requirement that side BTLs must be met within 30 feet of a corner, but it is concurrently undermined by the excessively low side BTL percentages of 30% or less (see p.9). Side BTLs for corner lots should be eliminated, and front BTLs applied to both frontages. Reasonable side BTLs for non-corner lots should, however, be established, to ensure that there are no large gaps in the pedestrian frontage zone.

Finally, we note that the draft ordinance lists both setbacks and BTLs in multiple locations, which is confusing and unnecessary. We recommend removing Section 3 entirely, as all important standards are already included in the building form standards table beginning on p.6.

Thank you for your consideration.

Sincerely,



Colin Fiske

Executive Director

Coalition for Responsible Transportation Priorities

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