

The McKinleyville Organizing Committee appreciates this opportunity to provide comment on the Draft Town Center Ordinance dated Dec 7, 2022. We have many years of involvement with the project, both gathering public input for it as well as promoting the project's implementation. We remain committed to seeing a Town Center Ordinance passed that fulfills the intent of the 2002 Community Plan and that improves the quality of the "downtown" experience for all users.

General Comments:

We request future Town Hall style meetings to facilitate open forum discussion on the Town Center Ordinance versus having community input limited to 3-minute comments as per rules of the MMAC meeting.

We echo and shepard the communities desire for more publicly-owned spaces for public gathering/meeting within the Town Center. We suggest the MMAC create a Citizen Committee to pursue grant funding for such community improvements both within the Town Center and external to it..

At the November 2022 MMAC meeting, County Planning Chief John Ford stated that a one-parameter wetlands delineation would be conducted this Spring on the south side of Hiller Rd within the Town Center Boundary. We applaud this effort and encourage the County to likewise delineate all one-parameter wetlands on the north side of Hiller within the Town Center Boundary as per our Community Plan.

Specific Comments:

Section 1. Purpose and Intent needs wordsmithing. We suggest the following "The McKinleyville Town Center is intended to create a unique identity and a sense of place for McKinleyville by: defining physical relationships between people and buildings, including high-density residential buildings; providing a full range of commercial, office and civic uses, and creating enhanced opportunity for public gathering, meeting and recreational spaces that are interconnected to encourage bicycle, pedestrian and transit travel while maintaining safe automobile access"

2.1 Verbiage is confusing. We suggest "To implement the vision for the McKinleyville Town Center the underlying principle Mixed Use (MU) zone will be modified to incorporate Residential Multiple Family (R-3), Open Space and Public Facility districts into an overlay district called the Q-Zone.

2.2 Please include the referenced text from General Plan Section 314-6.4, 4.4 and 38 so that the community can clearly see what is being included without needing to go to the General Plan.

Map 2. Public Facilities (PF) Zone is inadequate. With this Town Center (TC) effort we need to plan to enhance what we have. We need PF west of Central Ave too. Use grant funding to acquire the building next door to the former Pop-up Museum and create an expanded senior center. Use grant funding to acquire the former Pop-up Museum space for community-run incubator kitchens and pop-up markets etc..

Map 2. The mapped wetland “zone” does not include full mapping of all area wetlands protected by community plan. Mapped area for Mixed Use and R-3 zones west of Central Ave currently include forested riparian and wetland habitats, but this is not called out, nor mapped, anywhere in the document for the public to see.

Page 4 MU1(Urban)—should include gardens/agriculture

3.1 What percentage of MU will be housing versus commercial? Max building height = 75'. Is this an error?

3.2 Building Form Standards—this section seeks to define the physical relationship between people and buildings but there are no human figures and the diagrams are 2D. We suggest 3D diagrams that also include humans for scale.

Map 2, page 6—shows Nursery Rd extension in front of Timber Ridge connecting to Hiller. This should not be a road but a ped and bike path instead.

4.1.1.1 Exhibit 1—Caltrans commented remove parking in favor of parklets, County Public Works commented this design is dangerous. Why only two options? Our Community Plan states in section 2352, 6. “The Town Center shall identify implementation alternatives”, not just one. Why not an option that would place parklets where parking is proposed? Can we use the burden area for complete street elements? Our Community Plan also requires that the funding source for Central Ave improvement be identified (section 2352, 6).

4.1.1.2 Hiller is proposed as focal entry... Who decided this? The focus has always been on the connection between east and west sides of Central.

4.1.2.2 Connection from either Railroad across the site to Hiller Road or to the extension of Nursery Way north of Hiller. This is not illustrated on Map 2.

5.1, 5.1.1 This is non-compliant with provisions of our Community Plan. As per the provisions of Community Plan Section 2640—a Design Review Committee shall be formed to review Town Center design specifications and approve Town Center standards and guidelines. After the Design Review Committee does their work we suggest the following edit to text “Building Design, Open Space and Urban Design will be reviewed and considered for consistency with Design Guidelines adopted by Design Review Committee and by Board of Supervisors' Resolution.”

Within Section 5--development standards and site design are mixed, making this section confusing. We suggest separating the two topics into separate sections.

5.5 Open Space needs to be the primary design element of the Town Center. Historic and current public input prioritizes public gathering/meeting areas as the focus of the Town Center. Open Space creates the sense of place for McKinleyville, and maintaining and embracing the rural atmosphere that community has identified as the key, quality characteristic of McKinleyville. Our CP, Section 2600 Urban Land Use states *“The protection and enhancement of the community’s rural qualities within the Urban Development Area is a priority with this Plan. Streams, streamside management areas, wetlands, open spaces, recreational areas and parks accessible to the public at large are identified as features which enhance the rural qualities within our community. The community has a history of protecting these features, and this Plan contains policies intended to carry this tradition forward to the next generation. As the community grows, these features will deliver a higher quality of life to its residents.” It is a policy of our plan that “The community shall maintain its rural qualities within the Urban Development Area by defining and protecting its streams, riparian corridors and greenbelts, wetlands, open spaces and parks.”*

Community input for the 2020 Survey continues to call for additional park space dedication and open space protection within the Town Center. See table below. (Source McKinleyville Town Center Survey 2020.)

Below are 8 example non-commercial land uses from the Community Plan and Town Center workshops. With your priorities from the last question in mind, select up to 4 things want to see in the Town Center.

	Response Percent	Response Count
Town green/park	78.6%	231
Open space with trails	67.3%	198
Performance venue	54.1%	159
Community hall for events/gathering	48.0%	141
Children's play area	44.6%	131
Multifamily housing	25.9%	76
Public services (i.e. County offices)	20.7%	61
Museum	17.7%	52
Other	16.7%	49

6. Title of this section is misleading to the public, as this effort currently seeks to remove the stringent one-parameter wetland protections of the Community Plan in favor of a less protective three-parameter wetland definition. Move to strike the following “Protection and Conservation of” in Section title.

6.3 This section is non-compliant with the McKinleyville Community Plan. Per our Community Plan (CP) wetlands must be identified and mapped utilizing the California Department of Fish and Wildlife (CDFW) definition (one-parameter). In response to the

cumulative, historic loss of natural resource areas, the 2002 Community Plan adopted the CDFW definition to apply to all our town planning. Our CP makes it very plain that with this document (CP) we intend to expand our protection and conservation of wetlands now and into the future.

Section 3420 of our CP states the following “The protection of sensitive habitat is an important part of planning and environmental assessment for land use development. When habitat for a specific species of plant or wildlife are in short supply, because either the habitat is limited to a small geographical area or is threatened by rapidly changing conditions, then the habitat is designated sensitive. A critical habitat is a type of sensitive habitat which is presently threatened and reduction or loss would cause the extinction of the species.

Streams, streamside management areas, wetland areas and other sensitive areas are identified by the County Framework Plan as sensitive habitats. Sensitive habitats are subject to Framework Plan policies aimed at maintaining and restoring these areas. Mapping and identifying these sensitive areas has proven to be critical in the effort to protect fisheries and preserve their natural habitat.

These fragile natural resources present significant development constraints from flooding, erosion, liquefaction and septic disposal limitations. In their natural state, they provide many valuable social and ecological functions. Wetland areas can control flooding and stormwater runoff, provide areas for groundwater recharge, filter out water pollutants, and preserve habitat for many species of fish, wildlife and vegetation while providing recreation opportunities and open space.

From the Mad River at the southern boundary to the Little River in the north, McKinleyville is blessed with an abundance of freshwater streams and wetlands resources containing habitats for numerous wildlife species of birds, fish and small mammals. These resources represent a unique scenic asset to the community while serving an important function as natural drainage channels. Retaining these areas in their natural state will nurture a higher quality of life as the community grows.

3421 Goals

- 1. To identify and preserve wetlands, streams and their buffers to protect fisheries, preserve natural habitats, and provide open space.*
- 2. To identify and map Streamside Management Areas as buffers to protect the streams and their natural habitats from significant impacts.*
- 3. To identify and map Wetland and Wetland Buffer Areas (distinct from the Streamside Management Areas), to protect wetlands from significant impacts, and to retain the many valuable social and ecological functions which wetlands provide.*
- 4. To protect sensitive fish and wildlife habitats by minimizing erosion, runoff and interference with surface water flows.”*

Additionally, none of the triggers allowing for amendment of our community plan to deregulate wetlands within the Town Center planning area have been met (see CP Section 1452.2 Amendments). Further, State Planning Law does not allow the ordinance process to amend the Community Plan (General Plan). State Law requires that the Ordinance must instead conform to the Community Plan, not vice versa; the tail does not wag the dog.

6.4 “Relocate” refers more correctly to what we do with nuisance wildlife. Suggest global replacement of the word relocate with re-establish.

6.5 The proposed 1.5:1 replacement ration is too low. A 3:1 replacement ratio is the industry standard. Also given that the area proposed for mitigation is already most likely wetland under community plan definition—the County and developer should realize proposed mitigation will not count as “creation” i.e making wetland from dry land—therefore all proposed wetland mitigation at the west end of property will entail bumping up the function and value of pre-existing wetland. This is called rehabilitation and often requires upwards of 3-10 acres of rehab to offset the impact of one-acre of wetland fill.

6.6 Incorporating up to 50% of the spruce grove into the developed environment is likely unfeasible as spruce trees are shallow rooted and adapted to living in wet environments—this means roots would interfere with paved surfaces. Additionally all native spruce trees are protected by our Community Plan wetland standards. Further, gallery riparian forested habitat exists midparcel adjacent to Railroad avenue. This habitat is also forested wetland and will need to be identified as a regulated resource. Alder and willow groves are present and are also a type of forested wetland protected by our community plan. A second spruce grove (forested wetland) exists on the north side of Safeway, along Pickett, behind the day care facility.

6.5.8 We suggest following edit ...shall “reach agreement with CDFW prior to approval of the plan”.

Final General Comments:

Wetlands are the type of open space that characterize our rural environment and need to be embraced as a primary design component as per our CP. We need discussion on the wetlands as a primary design asset within Town Center.

Also, all one-parameter wetlands need to be identified on a map for the entire Town Center area and then overlaid with proposed development footprints including trails to fully assess all environmental impacts. To permit construction within our wetlands areas, the developer must first show they avoided wetlands to the greatest extent possible and then that they selected the least environmentally damaging project alternative.

Thank You again for the opportunity to comment; we look forward to collaborating further with you on this important project for our community.

Signed,
Kate MacClain
Bonnie MacGregor
Twila Sanchez
Deborah Hubbard
Kelley Garrett