



February 7, 2023

McKinleyville Municipal Advisory Committee  
c/o Clerk of the Board  
County of Humboldt  
825 5<sup>th</sup> Street  
Eureka, CA 95501

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**RE: Draft McKinleyville Town Center Ordinance**

Dear McKinleyville Municipal Advisory Committee Members, Director Ford & Supervisor Madrone:

The Coalition for Responsible Transportation Priorities (CRTP), Environmental Protection Information Center (EPIC), Northcoast Environmental Center, and Redwood Coalition for Climate and Environmental Responsibility (RCCER) appreciate the opportunity to comment on the latest draft of the McKinleyville Town Center ordinance (“ordinance”), as most recently reviewed by the McKinleyville Municipal Advisory Committee (MMAC) at its meeting on January 25, 2023. We thank each of you for the time, effort and resources that have been expended in the development of the draft ordinance.

The ordinance as currently written represents a major improvement over historical development patterns. As our region's third-largest community, McKinleyville desperately needs the kind of walkable, climate-smart development which the ordinance aims to guide and encourage. However, the draft ordinance also contains at least two major flaws which could, if not corrected, prove fatal to that vibrant vision. These flaws pertain to vehicle parking and street design.

### **Costly Parking Mandates Must Be Eliminated**

Onerous vehicular parking mandates run counter to the purpose and function of a thriving town center, both by increasing the cost of infill development and by creating an urban form that is functionally hostile to pedestrianism. We strenuously urge the removal of parking mandates from the ordinance.

Parking mandates in local zoning codes are based on the assumption that all users of new buildings will own and drive private vehicles for their trips, no matter what. This assumption has been debunked in a variety of ways, from population-level data showing that many local households do not own a vehicle and many more walk, bike or ride the bus for their trips, to research showing that parking availability itself strongly affects car ownership and driving levels. Other research has also demonstrated that the quantitative basis for existing parking requirements is weak and unscientific at best.

The effects of parking mandates on development and transportation patterns are significant. Not only do they increase driving levels, they also effectively prohibit the kind of dense development required for walkability, bikeability, and good public transit. Vehicular parking is also expensive to construct and maintain, increasing the cost of construction and therefore the cost of housing and commercial rents. In many cases, parking requirements are the single most expensive regulatory mandate affecting new development, and they frequently make potential infill development projects financially or logistically infeasible.

In recognition of these facts, a rapidly growing number of communities around the country are eliminating parking mandates, especially in town center or downtown areas. Humboldt County should follow suit in the McKinleyville Town Center.

We acknowledge and appreciate the fact that proposed parking mandates in the Town Center have been somewhat reduced compared to what is required in other parts of the unincorporated county. However, the mandates remain both unnecessary and extremely problematic. To illustrate some of the problems, let us consider a typical building of the kind envisioned for the future town center: a modest three-story building with 12,000 square feet of shops on the ground floor and 25 small affordable or market-rate apartments on the second and third floors. The draft ordinance would require 16 parking spaces for the shops and 25 for the homes, for a total of 41 spaces. An average parking lot requires about 320 square feet for each space (including the drive aisles), which means this building with a 12,000-square-foot footprint would require over 13,000 square feet of parking lot. Even if the developer were able to meet all of the ordinance's requirements for reduced parking mandates—which is far from guaranteed—it appears that well over half of this parking would still be required.

As this example demonstrates, the draft ordinance's parking mandates would be extremely expensive and potentially impossible to meet while meeting the design standards. They would likely result in most of the "pedestrian-oriented" Town Center being devoted to private vehicle storage. This is not a situation that calls for half measures. Please eliminate all parking mandates in the town center area and allow builders to provide the number of parking spaces they deem appropriate—hopefully, for the sake of the town center, relatively few.

### **Central Avenue Must Be Narrowed and Redesigned**

The draft ordinance currently provides two alternatives for Central Avenue: either leave it as it is, or reduce the number of lanes and redesign it for safe and comfortable walking and biking in order to make it a "core component of the Town Center." We feel strongly that leaving Central Avenue as it is should not be an option. With no changes, this thoroughfare will continue to sever the Town Center in two parts and severely deter walking and biking. A lane reduction and redesign is desperately needed.

To illustrate the need for a lane reduction and substantial redesign, we estimated the level of traffic stress (LTS) for bicyclists and pedestrians on Central Avenue. LTS is a measure of the experience of people biking or walking on a street, and research has verified its correlation with public willingness to bike or walk. LTS scores range from 1 to 4, with 1 (low stress) indicating a street where people of all ages and abilities feel comfortable and will use the street, and 3 or 4 (high stress) indicating a street where only a very small fraction of the population will do so.

Based on the number of traffic lanes, frequent bike lane obstructions, lack of bike lane buffer or protection, and relatively high speed limit, Central Avenue currently would be classified at least LTS 3 for biking, and likely LTS 4 due to speeds frequently exceeding 40 mph. Based on the number of traffic lanes, limited buffers, and frequently narrow or missing sidewalks in the town center area, Central Avenue would be classified as LTS 4 for walking. Central Avenue must be narrowed, slowed, and substantially redesigned for the town center to be a place where children, seniors, and all other residents and visitors can and will actually use the streets with comfort and confidence (in other words, to achieve LTS 1 for both walking and biking).

In conclusion, we strongly urge you to remove all vehicle parking mandates and to include a lane reduction and substantial Central Avenue redesign in the final Town Center ordinance. Thank you for your consideration.

Sincerely,

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