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Dear Planning Commission, Staff and Board of Supervisors,

Please accept these comments on the Land Use Element of the General Plan, (Group 7a) representing the views of Green Wheels, an organization that advocates for balanced and sustainable transportation on the North Coast.

Respectfully submitted,



Chris Rall  
Executive Director - Green Wheels

### **Comments on Land Use Element of the Humboldt County General Plan**

We have provided comments on several elements of the general plan update thus far. These have driven home the idea that the county's decisions about our transportation system have substantial ramifications on whether we meet our goals in many elements of the general plan.

#### *Energy Element:*

Transportation accounts for 45% of Arcata's greenhouse gas emissions. This proportion is likely similar in other parts of the county. Our transportation system is almost entirely dependent on one energy source, oil, whose price has tripled in the last five years, and is likely to continue to increase. Reductions in fuel consumption and emissions brought on by improvements in automobile efficiency are likely to be canceled out and overwhelmed by increases in vehicle miles traveled (VMT) that urban growth patterns continue to generate.<sup>1</sup>

#### *Noise and Safety Element:*

The vast majority of accidental injuries and deaths are automobile related. Motor-vehicle related deaths are the number one killer of people aged one to 35 years old. Deaths from fire, flood, earthquake and tsunami combined (the main focuses of the Noise and Safety Element)

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<sup>1</sup> Ewing, R., K. Bartholomew, S. Winkleman, J Walters and D. Chen. 2007. Growing Cooler: The Evidence on Urban Development and Climate Change. Urban Land Institute. Chicago, IL.  
<http://sgusa.convio.net/site/DocServer/GrowingCooler9-18-07small.pdf?docID=4061>

represent about one twentieth the number of motor-vehicle related deaths.<sup>2</sup> Transit is ten times safer per passenger mile,<sup>3</sup> and pedestrians and bicyclists are rarely involved in fatal collisions unless a motor-vehicle is involved. Traffic is also a major noise source. This means a more balanced transportation system would improve safety and reduce noise impacts.

#### *Economic Development:*

Economies set up in landscapes that are automobile dependent must import more resources in the form of vehicles, fuel and parts from outside the local economy, causing a substantial drain on the economy.<sup>4</sup> Areas that make strides to reduce auto-dependence see substantial local economic benefits from reduced transportation costs.<sup>5,6</sup>

Fuel prices have tripled in the last 5 years (oil price.net).<sup>7</sup> If they continue to increase at a similar rate, our current state of auto-dependency could cripple the economy by destroying the value of any urban development that cannot be effectively used by residents without single occupant vehicles.

#### *Health:*

While there is no “health element” in the general plan update, the transportation system can have a substantial effect on the health of citizens. An emphasis on transportation infrastructure for physically active modes such as biking and walking can reduce chronic diseases associated with inactivity. Emphasis on transit encourages more walking, and has a positive impact on air quality.

#### *Land Use Element*

A balanced transportation system which emphasizes the development of improved transit and improved infrastructure for biking and walking will go a long way toward helping us reach the goals we set in the previously mentioned areas. But the Land Use Element is slightly different in its relationship with transportation in that the benefits and / or costs run both ways. A balanced transportation system can help to preserve resource agricultural and forest lands, and it can make water and sewer services cheaper. Providing quality pedestrian, bicycle and transit infrastructure gives developers and their customers incentive to create housing and businesses close to transit nodes at urban cores. Smart land use plans that encourage this type of development are critical to facilitating more cost-effective balanced transportation systems.

We evaluate the currently available Landuse Element maps, text and alternatives based on how successful they are likely to be in reducing automobile dependence.

#### *Transit-Oriented Development*

Looking at the landuse maps and chapter on managing growth, it becomes apparent that patterns of planned growth were based more on water and sewer infrastructure than

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<sup>2</sup> <http://webappa.cdc.gov/cgi-bin/broker.exe>

<sup>3</sup> Todd Litman. 2005. Terrorism, Transit and Public Safety. Journal of Public Transit 8:33-46.

<http://www.vtpi.org/transitrisk.pdf>

<sup>4</sup> Litman, Todd and Felix Velib. 2002. Automobile Dependency and Economic Development. Victoria Transportation Policy Institute. <http://www.vtpi.org/ecodev.pdf>

<sup>5</sup> SeeFootnote 1.

<sup>6</sup> Dylan Rivera. 2007. Less driving is more cash for Portland. The Oregonian

<http://www.oregonlive.com/news/oregonian/index.ssf?/base/news/1187576751202450.xml&coll=7>

<sup>7</sup> Crude oil price trends available at <http://www.oil-price.net/>.

transportation infrastructure. In particular, little attention appears to have been paid to which areas are currently served by transit and where transit improvements are possible and likely. For example, existing urban areas along 101 within 10 or 15 miles of Eureka or Arcata are better served by transit now and likely to continue to be better served than areas off this major transit route. We need explicit policies encouraging walkable compact mixed use development in areas well-served or planned to be well-served by transit.

Areas such as Ridgewood Heights and Elk River have seen some urban development but have limited potential to be well served by transit. The plan should limit additional development in this sort of area except mixed use which may help reduce the need for residents to make trips out of the area for shopping, work or other activities.

Land Use mapped out in Alternative A seems to have this most in mind, but it could be more explicitly stated in policy so future implementers of the plan understand the reasoning. An additional review of the Land Use maps will be necessary as the Circulation Element is written and becomes available. It is critical that these two elements be integrated, and it is unclear at this stage whether that has been accomplished. For example, inclusion of planned bus running ways using Bus Rapid Transit (BRT) strategies in the Circulation Element for an area such as Central Avenue in McKinleyville would need to be integrated with land uses and densities within walking distance of potential stations.

#### *Mixed Use of Commercial Property*

One of the most effective ways to create more compact mixed use development without rezoning areas to change their use, is to encourage residential and office development on second floors in commercial zones. This would put more residents closer to services and places of employment. The Land Use Element fails to do this. Below is an example from Arcata's General Plan of the type of language that has been effective in developing a downtown that is quite popular and successful:

*Commercial developments should include residential units where feasible.*

*Residential units should be located on upper floors or at the rear, to maintain uninterrupted commercial uses at the street level.<sup>8</sup>*

Using this type of strategy, an area such as Central Avenue (along with some code to orient development to the street and parking to the rear) in McKinleyville could gradually be redeveloped to become a less auto-dominant place for people to go about their business. While the McKinleyville Community Services Plan calls for the development of a new pedestrian-oriented downtown area on Hiller Avenue, this could create problems. First, it is a lost opportunity to do something special, such as a central park or an educational farm, with an existing quality piece of open space that is accessible to many residents. Second, there is already a lot of commercial property in McKinleyville. Creating an additional commercial center will force the two adjacent commercial areas to compete, potentially creating many vacant commercial properties and subsequent blight if businesses fail.

Redeveloping the existing McKinleyville downtown, which currently lies along Central Avenue roughly between School Road and Bates Road, could create the walkable downtown that McKinleyville residents asked for in their community plan. This north-south oriented downtown district would work better with a fixed transit route than the Hiller Avenue downtown concept would.

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<sup>8</sup> [http://www.cityofarcata.org/index.php?option=com\\_content&task=view&id=169&Itemid=253](http://www.cityofarcata.org/index.php?option=com_content&task=view&id=169&Itemid=253)

The wording regarding residential uses in the description of commercial land use says residential density should be “compatible” with adjacent residential areas. This implies “similar” densities and should be clarified. Densities in second-floor residential development in commercial areas could be substantially higher than that of adjacent residential zones and have little-to-no negative effect on adjacent residential neighborhoods. At the same time, these high residential densities within commercial areas could help support the presence of businesses that serve day-to-day needs of the wider area such as grocery markets, laundry-mats, cafes and hardware stores.

Issues with spill-over parking are critical to these smarter landuse approaches. We hope the Circulation Element and / or Community Design Element will effectively deal with our current over-abundance of parking to refocus town centers as places for people to go about their business in quality public spaces, as opposed to places where cars go to be parked.