



June 30, 2019

Michael Wheeler, Senior Planner
Humboldt County Planning and Building Department
3015 H Street
Eureka, CA 95501

Subject: Notice of Preparation for the North McKay Tract Subdivision Draft
Environmental Impact Report, SCH #2019049034

Mr. Wheeler,

On behalf of Humboldt Baykeeper's board, staff, and members, I submit these comments on the Notice of Preparation of the Draft Environmental Impact Report (DEIR) for the proposed North McKay Tract Subdivision ("Project") in Cutten. Humboldt Baykeeper works to safeguard our coastal resources for the health, enjoyment, and economic strength of the Humboldt Bay community through education, scientific research, and enforcement of laws to fight pollution, and is a member of the California Coastkeeper Alliance and the international Waterkeeper Alliance.

We appreciate the opportunity to comment on concerns and issues that we believe should be assessed and impacts avoided to the extent feasible, with minimization and/or mitigation measures applied where impacts cannot be avoided.

Impacts to the Ryan Creek Watershed and Biological Resources it Supports

First and foremost, we are concerned about the impacts to water quality, wetlands, riparian and aquatic habitat in Ryan Creek and its tributaries. According to the California Department of Fish and Wildlife,¹ the Coho Salmon in Ryan Creek are considered a key population to maintain or improve. Any increases (whether temporary or permanent) in instream sediment or turbidity, stream channel aggradation, water temperature, loss of habitat structure or estuary habitat would likely contribute to the further decline of the Coho Salmon, as well as steelhead and coastal cutthroat trout.

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Increasing impervious surfaces in the Ryan Creek watershed will likely lead to increases in point source and non-point source pollution. Impervious surfaces should be minimizing to the maximum extent feasible, and the best Low Impact Development (LID) methods should be used to prevent stormwater runoff from reaching Ryan Creek, its tributaries, wetlands and springs in the area. LID methods should also be incorporated to address some of the poor practices of past development if possible to mitigate unavoidable impacts of the proposed development.

Household Trash Control and Wildlife Impacts

In many rural areas where housing development encroaches on or abuts wildlife habitat, household trash control is important for preventing unnecessary conflicts that too often lead to death for bears and other scavengers. How will trash-related conflicts with wildlife be prevented so that these impacts to wildlife are avoided or minimized?

Impacts to Recreation

The DEIR for the Project should assess impacts to existing recreational facilities as required by the California Environmental Quality ACT (CEQA), and should consider development of new neighborhood parks as well as development of trails and trailheads to provide access to the County's McKay Community Forest. The McKay Trails Plan is still being developed, but currently there is a lack of trailheads and access points into the Community Forest for the existing neighborhoods.

How will the residents of the new homes access the Community Forest safely? Sidewalks and trails should be planned for safe access to the Community Forest as well as new and existing neighborhood parks.

Where will trailheads, parking lots, public bathrooms, trash cans, dog waste bag dispensers, and other public services be located?

Landslides, Steep Slopes, and Soil Stability

Based on the geological and soil surveys and reports that have been conducted within the project area over the years, there are numerous areas of deep-seated landslides, steep slopes, unstable soils, wetlands, springs, year-round as well as seasonally wet areas, and other features of soils and geology that must be investigated and mapped in relation to the proposed development, including housing, roads, and other impervious surfaces. These features pose potential public hazards but it is also critical to assess potential erosion and sediment delivery that would negatively impact Ryan Creek, its perennial and seasonal tributaries, wetlands, and all of the aquatic, riparian, and estuarine species and their habitats. The decades of logging in the areas has altered the landscape such that topographic maps are unreliable, and the exact locations of geologic features, soil types, streams and wetlands must be updated.

Impacts to Timber Harvesting within the McKay Community Forest

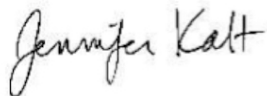
The Community Forest is planned for sustainable timber harvesting, which will undoubtedly result in complaints related to noise, logging truck traffic, air pollution from slash burning, etc. With hundreds of new residents moving into the proposed subdivision, how will the County avoid or minimize these types of conflicts?

Conclusion

Due to the importance of the Ryan Creek watershed and its physical and biological characteristics, it can reasonably be argued that the area is inappropriate for further residential and commercial development due to the irreversible impacts that it will undoubtedly cause. However, we recognize that the decision to change the land use classification was made nearly 25 years ago. It may be argued that the Project will provide much-needed housing, but the distance from public services, medical facilities, and workplaces should be carefully considered. We strongly encourage the County and the Project proponent to go above and beyond legal requirements to seek public and expert input on traffic, non-motorized transportation and Safe Routes to Schools, public recreation, emergency response and evacuation plans, and other public health and safety impacts related to the built environment, since the Project will result in hundreds of new residences that will exacerbate existing conditions. Although some of these impacts are not at the core of Humboldt Baykeeper's mission and expertise, some of our members and volunteers have expressed these concerns along with those discussed in detail above.

We appreciate the opportunity to provide comments while the Project DEIR is being developed. Please keep us informed at the earliest possible time to enable meaningful review and comment as the Project moves forward.

Sincerely,



Jennifer Kalt, Director

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ⁱ California Department of Fish and Wildlife, 2004. Recovery Strategy for California Coho Salmon. Report to the California Fish and Game Commission, Sacramento, CA.