

City of Eureka
Community Development Department
Regarding EIR for the Marina Center Proposal

Dear Reader,

There are issues in the EIR proposal for the development of the Balboa Tract that the public can't address in the 2,000 page document. The few statements I make are about some of the known objections.

The obvious one is the increased traffic on Highway 101 which is already overcrowded, and the spillover on Henderson and Harris; also a degradation of our air quality

41-1

The proposed cleanup of this area is not adequate for the decades of spilled toxic in this sensitive area. Spraying even it is only a bandage, not the solution to leakage into our waterfront

41-2

Constructing a big box store, expensive housing, more restaurants and other shops does not culturally meet the need of the community when our economy is in a freefall.

41-3

John A. Linklock
7080 LINDA ROAD
EUREKA CALIF. 95503

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JAN 9 11 2009
DEPARTMENT OF
COMMUNITY DEVELOPMENT

Letter 41: John Birkbeck

- 41-1 The comment expresses concerns about increased traffic on U.S. 101 and spillover on Henderson Street. Please see response to comment 38-4, which addresses potential spillover traffic onto Henderson Street.
- 41-2 The comment stating that the proposed cleanup of the project site is inadequate is noted.
- For further discussion regarding the Remedial Action Plan for the proposed project, please see Master Response 4 and new Appendix S.
- 41-3 The comment states that the proposed project is not properly timed considering that the “economy is in a freefall.” The comment is noted. Please see Master Response 1, under “New Recessionary Conditions.”

Jan 28, 2009

Dear Mr. Olson,

Re Balloon Tract,

Dear Mr Olson,

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JAN 28 2009

DEPARTMENT OF
COMMUNITY DEVELOPMENT

Do we really need more retail development?
As I drive through town and visit the Mall I
see so many empty stores.

42-1

The 'Waterfront Housing' will not be affordable
for most people.

42-2

As to the 'short-cuts' in the cleanup process being
asked for, I know a lot on 101 Street, close to
the Library which is considered to be part of Old
Town. It was a old 'Arco' station (although they
denied owning it) I bought ^{the} property approx. 28
years ago. I was informed I had to clean it
up. S.H.N did a lot of the cleanup, tests monitoring,
wells on the property and in the street making
sure no pollution was going to go under the new
library. This took 20 years to be fully completed.
The City is now being asked to 'forgive' part of
the cleanup for the Balloon Tract?

42-3

Finally that parcel could be developed into a
wonderful parklike and quality tourist attraction
which would fit with its location and 'old
Town' much better, and the waterfront.

42-4

Sincerely,
Margaret Birkbeck



Ms Margaret Birkbeck
6427 Brian Ln
Eureka, CA 95503

Letter 42: Margaret Birkbeck

- 42-1 The comment questions whether the retail market in Eureka is saturated. Please see Master Response 1, under “Vacancy in the City of Eureka.”
- 42-2 The comment states that the housing proposed for the project would not be affordable for most people. Please see the response to comment 48-5, which discusses the affordable housing goals of the City.
- 42-3 The comment questions the adequacy of the proposed cleanup of the project site. The comment is noted.

For further discussion regarding the Remedial Action Plan for the proposed project, please see Master Response 4 and new Appendix S.

- 42-4 The comment suggestive other uses for the project site is noted. Alternatives to the proposed project, some of which includes the uses suggested, are discussed in Chapter VI.

RECEIVED
DEC 17 2008
DEPARTMENT OF
COMMUNITY DEVELOPMENT

James & Kathryn Bardman
1185 Ridgewood Drive
Eureka Calif 95503-6630
707-442-9439

City of Eureka
Community Development Dept.
Att: Sidnie L. Olson, AICP, Principal Planner
531 K. Street
Eureka, Calif 95501

Dear Sidnie Olson:

My husband and I are long time residents of Humboldt County. (40 years+) There is our comment in regard to the Marina Center Development: After years of stagnat, debris filled, homeless habitet, Security National has cleaned up the mess so something worthwhile can finally be built on the Balloon Tract. It will provide jobs in this economic downturn, fill the coffers of Eureka with taxes and beautify the area. What a concept! Its been three years already - why not do the right thing and let this project move forward. What a great boost to the economy of the North Coast and Eureka! Wise waited long enough. Let Security National go ahead with their beautiful project.

Sincerely,
James & Kathryn Bardman

43-1

Letter 43: James and Kathryn Bardman

43-1 The comment expressing support for the proposed project is noted.

Comment Letter 44
Page 1 of 1

Sidnie Olson

From: Carol Bowden [carolbob1@suddenlink.net]
Sent: Monday, December 29, 2008 12:14 PM
To: DEIRcomments
Subject: 101 Eureka-Arcata

City of Eureka
Community Development Department
Attn: Sidnie L. Olson

In re the draft EIR - changes to 101 corridor between Arcata and Eureka:

Do none of the proposed infrastructural changes. Enforce the speed limits as they are now posted. Consider slowing traffic further to 45 miles per hour - even 40 mph. Enough is enough. Drivers must take responsibility for their actions.

44-1

None of this proposed expenditure is necessary.

Sincerely,
Jere Bob Bowden
P.O. Box 1244
Ferndale, CA 95536
707-786-4434

5-451

Comment Letter 44
Page 1 of 1

Sidnie Olson

From: Carol Bowden [carolbob1@suddenlink.net]
Sent: Thursday, January 29, 2009 11:51 AM
To: DEIRcomments
Subject: EIR - Marina Center

To Whom It May Concern:

In re: Draft EIR

Given the apparent inadequacy of the Marina Center's EIR analysis of the impact on Humboldt Bay and its wildlife of toxic contaminants at Security National's proposed building site, this report should be considered unsatisfactory and should not be accepted by the City. Much is at stake here. All possible concerns for the health of the remarkable eco-system that is Humboldt Bay must be addressed completely. Your responsibility is great. Please insist that discussions of environmental issues in the report meet the highest standards.

44-2

Respectfully,
Jere Bob Bowden
P.O. Box 1244
866 Arlington Avenue
Ferndale, CA 95536
707-786-4434

Letter 44: Jere Bob Bowden

This comment letter may be about another project that relates to infrastructure improvements planned for the U.S. 101 corridor between Eureka and Arcata. Nonetheless, the following are responses based on applying the comment letter to this project.

- 44-1 The comment suggests not doing any of the proposed mitigations, instead reducing the speed limit to 40 mile per hour on Broadway and enforcing the speed limit.

Due to the impact of the proposed project on the roadways, specifically on U.S. 101, it is the responsibility of the developer to mitigate the impacts. The speed limit on U.S. 101 on the one-way couplet of Fourth and Fifth Streets in Downtown Eureka plus Broadway along the project frontage to Wabash Avenue is 30 mph. Changing the speed limits further south can only be done through completion of an engineering and traffic survey consistent with the California Manual on Uniform Traffic Control Devices. Caltrans has completed such studies and the speed limits south of Wabash Avenue are appropriate and consistent with state law. Further, the establishment and enforcement of speed limits is a matter for Caltrans and state and local law enforcement, and is not an element of the project or project mitigation.

- 44-2 The comment states that the Draft EIR's analysis of the proposed project's impact on the Humboldt Bay and its wildlife is inadequate. The comment is noted. For further discussion regarding the Remedial Action Plan for the proposed project, please see Master Response 4 and new Appendix S. Note that the contamination of the project site is an existing condition, and the proposed project would remove contaminants from the soil.

Sidnie Olson

From: Brenda Bowie [brenda_bowie@dot.ca.gov]
Sent: Friday, January 30, 2009 10:59 AM
To: DEIRcomments
Subject: COMMENTS

I support the project. I believe it will be good for the community. I love Walmart - bring it on in. It will provide jobs and encourage other shop owners to stop overpricing their goods. I think many good things will happen if the Marina Center gets built.

45-1

Brenda Bowie
Training Coordinator
District 1 - Eureka
(707) 441-5814
FAX (707) 441-5871
CELL (707) 498-0119

Letter 45: Brenda Bowie

45-1 The comment expressing support for the proposed project is noted.

Sidnie Olson

From: John Bowman [johnbbowman@gmail.com]
Sent: Tuesday, December 09, 2008 8:01 PM
To: DEIRcomments
Subject: Comments regarding the Marina Center DEIR

To whom it may concern,

I am writing in response to the Marina Center DEIR. I reviewed the report and the different technical appendices and found that some of the information seems to be very biased in nature. The report from CBRE Consulting, Inc. (Appendix L, Response to Economic Research Associates' October 17, 2007 Peer Review of the Eureka Balloon Track Retail Development Economic Impact and Urban Decay Analysis done by CB Richard Ellis in November 2006,) makes the following statement:

"ERA cites a belief that the possibility exists for dislocation in the local retail market as a result of Home Depot's competitive influences. Accordingly, they indicate it might be helpful to suggest some mitigation measures that the applicant could provide related to displacement rather than urban decay." CBRE Consulting respectfully disagrees with this suggestion, given that the study was conducted in the context of an EIR, where the fundamental issue is the potential for the project to cause or contribute to urban decay, not displacement or the changed orientation of existing retailers. Because the study concluded that no urban decay would result pursuant to the development of Marina Center, a discussion of mitigation measures is not warranted."

I do not understand how an evaluation of the displacement of existing retailers is not important issue during this evaluation. In 1999, the City of Eureka commissioned an economic impacts report for the very same piece of property for a different applicant who was attempting to change the zoning of the property from Public to Commercial for a Big Box development. The report was titled, "Economic Impacts Assessment for New Retail Development" by Bay Area Economics. I am very surprised that the Marina Center DEIR did not review this document. My conclusion is that the information in this study should be considered in the DEIR for the Marina Center.

46-1

Here is a link to the report:

http://www.bae1.com/publications/EurekaWalmartStudy.pdf

The following text is from the report:

"A new big-box home improvement center in Eureka would likely have a greater impact on existing stores in both the City and other parts of the County, since they have not previously faced this kind of competition, and the relative proportion of total building materials/farm implements sales going to this single outlet would be greater than for a general merchandise store. Furthermore, the projected increases in sales in this category are not nearly as great as for general merchandise, meaning that more sales would be captured from existing outlets rather than future increases in this category. The location of a new store either type outside the City but in the County would result in the remainder of the County capturing the projected increases in retail sales in each category as well as reducing current sales within the City. Smaller stores within the City might be less impacted depending on how far away the new store was located. From an overall retail sales revenue viewpoint, this scenario would be the worst for the City of Eureka, and the best for whatever other jurisdiction(s) received the benefit of the increased sales revenues."

46-2

It is clear to me that Chapter IV.P (Urban Decay) of the Marina Center needs to take into account dislocation in the local home improvement sector. There has been many studies that clearly show the effects of Big Box retail stores, and their impact on existing stores, especially small locally owned stores. To simply disregard these studies because a consultant believes that this information is, "in the context of an EIR" is a serious mistake, and only further acknowledges that the applicant is aware of the issue of displacement, and has chosen not to address it formally.

Here is some other statements from the same report that should be taken into consideration in the Marina Center DEIR:

Profile of General Merchandise and Home Improvement Retail Segments

The steady ascendancy of discount merchandising in the U.S. retail market over the past decade has occurred during a period when region-serving shopping centers with large discount anchor stores are supplanting many shopping malls with traditional department stores. Today, big-box retailers such as Wal-Mart and Target, and category killers (large specialist discounters) such as Toys "R" Us and Office Depot, are among the most vital and profitable of retail formats. A major reason for their success is the price consciousness of consumers that intensified during the recession of the early 1990s that has persisted since that time, in spite of many years of economic growth. Over the last 20 years the home

12/15/2008

improvement retail industry has undergone a dramatic shift away from small independent paint, hardware, and lumber stores toward national chain retailers with big-box formats and a wide variety of merchandise under one roof. Home Depot, HomeBase, and Orchard Supply are among the top 10 home improvement retailers in the U.S. As consumers purchase larger homes with more amenities, and as the "cocooning" trend continues (i.e., consumers spending more time at home and more money on home furnishings and décor), retailers such as Home Depot, Home Base, and Orchard Supply expect home renovation and repair expenditures to reach record levels. In spite of the rise of these big-box centers, home improvement retailing still remains fragmented, with only eight percent of the U.S. market captured by the industry leader (i.e., Home Depot).

Impacts on Existing Retailers in Eureka

The best scenario for existing retail sales outlets would be a "no build scenario," with no new competition from either a discount general merchandise store or home improvement center, and increasing retail sales due to increases in population and per capita disposable income. However, the retail environment in the County, particularly for general merchandise stores and other stores selling similar items, is already fiercely competitive. As shown by the data on individual outlets for Bayshore Mall, Downtown, and Henderson Center, there is already a great deal of turnover. A new big-box general merchandise store located within Eureka could capture most of the projected increase in countywide taxable retail sales in its category, but would also capture some sales now going to existing general merchandise outlets both within and outside the City. Any capture from other categories could come from the projected increase in sales rather than a shift of existing sales. The greatest impacts would likely be on existing major general merchandise outlets in the City and County rather than smaller stores that have already been affected by the opening of Bayshore Mall and other big retail stores in the area. Much of the projected increase in general merchandise sales captured by a new store would occur in Eureka even without the new store, since the City already is so dominant in this category.

A new big-box home improvement center in Eureka would likely have a greater impact on existing stores in both the City and other parts of the County, since they have not previously faced this kind of competition, and the relative proportion of total building materials/farm implements sales going to this single outlet would be greater than for a general merchandise store. Furthermore, the projected increases in sales in this category are not nearly as great as for general merchandise, meaning that more sales would be captured from existing outlets rather than future increases in this category. The location of a new store either type outside the City but in the County would result in the remainder of the County capturing the projected increases in retail sales in each category as well as reducing current sales within the City. Smaller stores within the City might be less impacted depending on how far away the new store was located. From an overall retail sales revenue viewpoint, this scenario would be the worst for the City of Eureka, and the best for whatever other jurisdiction(s) received the benefit of the increased sales revenues.

Jobs and Employment Impacts

As retail sales follow projected growth trends, the total number of jobs would increase over time regardless of whether a new store enters the market. The opening of a new big-box general merchandiser or home improvement center in Humboldt County would likely lead to a replacement of some current positions at existing retailers with positions at the new retail outlets. For a new general merchandise store, most of the replacement jobs would be similar to those lost in terms of wages and benefits, and would replace positions in similar types of stores (i.e., large retail chain stores). While the proportion of retail sales in some other sectors including the high-paying food sector would decline as consumers shift purchases to the new general merchandise store, this shift would come from growth in sales and would not lead to the replacement of existing high-paying positions with new lower-paying ones. For a new home improvement center, it is not clear how the wages and benefits would compare to existing outlets; the existing jobs lost may come from a variety of store types, and this retail sector currently has high wages relative to retail in general.

I believe the Marina Center DEIR is not referencing the report, "Economic Impacts Assessment for New Retail Development" because it did not support any of the arguments that would favor the Marina Center Development proposal. This report must be addressed in Chapter IV.P (Urban Decay) of the EIR for the Marina Center project, and a new question must be addressed regarding dislocation in the local retail market as a result of the Home Depot.

Thank you

John Bowman

12/15/2008

5-455

Letter 46: John Bowmen

46-1 The comment requests an evaluation of the displacement of existing retailers.

Please see Master Response 1, under “The 1999 Bay Area Economics (BAE) Report” regarding a proposed Wal-Mart Store in Eureka.

46-2 The comment expresses concern about the proposed project’s impact on the existing local hardware store businesses. Please see Master Response 1, under “Potential Local Store Closures” and under the “National Stores vs. Local Stores” discussion.

1/29/09

Ms Mildred G. Brucker
1400 Nursery Rd Unit 106
McKinleyville CA 95519
mittie

City of Eureka
Community Development Dept.
Att: Sidnie Olson, AICP Principal Planner
531 K St.
Eureka, Ca. 95501

There are several reasons for me to find objections to the creation of the Marina Center proposed by Security National on the 43-acre Balloon Tract overlooking Humboldt Bay. The main one being the nearly 300,000 sq ft Home Depot. It seems to me the comparatively small community, including the towns and villages surrounding Eureka, is already well and has been extremely well equipped from what I've learned to handle and supply the needs of our builders and others in our area and are always willing and eager to do so. I've had my needs always nicely cared for.

47-1

Another reason is to consider is the ^{non-}completion by all Departments' research into the impact on the environment, traffic affecting all surrounding areas; also the overall economic dima outlook doesn't bode well for much benefit financially for our area.

47-2

47-3

It seems that all necessary cautions have not been addressed in several concerns and my objection stands.

Yours Truly,
Mildred G. Brucker

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JAN 29 2009

DEPARTMENT OF
COMMUNITY DEVELOPMENT

Letter 47: Mildred Brucker

- 47-1 The comment states that the home improvement retail demands of the greater Eureka area are already met. The comment does not provide any detail on how this statement relates to environmental effects. Please see Master Response 1.
- 47-2 The comment expresses concern about the traffic generated by the proposed project. The comment is noted. Please see Master Responses 6 and 7 for further discussion of vehicular trips on Broadway and trip distribution.
- 47-3 The comment expresses concern that the proposed project is not timely considering current economic conditions. Please see Master Response 1, under “New Recessionary Conditions.”

Sidnie Olson

From: Lisa B [lisab@humboldt1.com]
Sent: Saturday, January 31, 2009 9:50 AM
To: DEIRcomments
Subject: Marina Center comments

Dear Ms. Sidnie Olson,

I have grave concerns about many aspects of the draft EIR, but most importantly, I am concerned about the environmental impacts outlined in the Baykeeper report on toxic chemicals. We need to plan for the long term health of the bay, and capping over such dangerous chemicals as dioxin, and building on top of them, will only create a toxic nightmare for future Humboldt County residents and wildlife. Stuff that seeps will continue to seep--even if it takes longer than your and my lifetimes. We need to root out the toxic chemicals before building on top of them.

48-1

I am also very concerned about traffic impacts. A couple of weeks ago, I attended a planning meeting which had an agenda item which touched on my own local traffic-nightmare intersections, including Harris and Dolbeer. It was very interesting to learn that city engineers had already graded this intersection with an "F" rating. Based on that, the increased traffic brought on by St. Joseph's recent remodel and the proposed rezoning of a nearby residential lot, would be rated as having "no significant impact". I was shocked! This demonstrates that the process of assessing public safety and appropriate mitigation for traffic issues is deeply flawed. I strongly oppose funneling more traffic into the proposed Marina area site when these kinds of bureaucratic games are being played with risk assessment. It is the public who pays, as I did recently with a totaled-out car in my own neighborhood where the city planning department isn't doing its job in upholding the safety of residents.

48-2

I am also opposed to the proposal to build a Home Depot store. We have no need to put our local hardware stores with knowledgeable, helpful staff, out of business. We don't need any more low-wage retail jobs. We don't need any more retail space downtown--we have empty store fronts.

48-3

48-4

We also don't need any more "upscale" housing. I see upscale houses empty from foreclosure on my way to work every day. We need low income housing that people working all of these low-wage jobs can afford. I work three jobs myself, just to make ends meet in a modest way. I know downtown Eureka workers who ask me if I know of any affordable housing options close to their work sites so they don't have to spend extra money to get to and from work. Is it asking too much to expect that an adult working full time should be able to afford a place to live that doesn't take more than half of their monthly earnings?

48-5

We need a marina project that addresses the needs of the people of the city of Eureka, and we need the city planning departments and city council to stand up to developers with their own agendas that are not in the residents' and taxpayers' best interests. I have been a Eureka city resident since 1990, and I am a 4th generation Californian.

Sincerely,

Lisa Butterfield
2440 Wood Street
Eureka, CA 95501
707-443-2472

Letter 48: Lisa Butterfield

- 48-1 The comment expresses concern about the existing contamination on the project site and whether than contamination leaches into the Bay. The comment is noted.

For further discussion regarding the Remedial Action Plan for the proposed project, and a discussion of the migration of chemicals in the subsurface, please see Master Response 4 and new Appendix S.

- 48-2 The comment expresses concern about the impacts of the proposed project on other intersections in the City farther away from the project site.

Please see response to comment 32-9 and Master Response 7, which discuss impacts to other corridors as well as to intersections farther from the project site. The proposed project would not significantly change the volume of traffic at Harris Street and Dolbeer Street, which is currently operating at LOS F.

- 48-3 The comment states that a national hardware store should not be part of the proposed project due to impacts on jobs, wages, and local businesses. The comment is noted.

Please see Master Response 1, under “Jobs / Wages Impacts” and “Potential Local Store Closures.”

- 48-4 The comment expresses concern about the retail market in the City of Eureka. The comment is noted.

Please see Master Response 1, under “Vacancy in the City of Eureka.”

- 48-5 The comment states that there is greater need for affordable housing in Eureka than for more “upscale” housing such as that proposed by the project. The project is not required by any applicable state or city regulation to include low income housing. Neither State law nor California Department of Housing and Community Development policy requires any local inclusionary housing ordinance within a jurisdiction’s housing element. The City of Eureka is expected to meet its low income housing needs through its compliance with its Regional Housing Needs Assessment planning for its General Plan.

The proposed development of market rate housing is necessary to meet the project’s key objective to “develop an economically viable mixed use project.” As a result of the former railroad use and activity at the project site, the property is currently considered an urban brownfield by the United States Environmental Protection Agency. Consequently, any future site redevelopment involves major clean-up and restoration costs which further reduce the project’s ability to support any below market rate housing development.

Sidnie Olson

From: Joseph Byrd [josephbyrd@suddenlink.net]
Sent: Friday, January 30, 2009 11:14 AM
To: DEIRcomments
Cc: DEIRcomments
Subject: Flaws in traffic projections in the Marina project's EIR

It is difficult to avoid thinking the writers of the Environmental Impact Report for the proposed Marina Center were having a little joke at our expense when they claimed that traffic safety was a positive byproduct of a big-box mall at the foot of Broadway.

The utterly unrealistic Marina EIR is a classic example of public relations spin. The fact is, the traffic impact will be far greater than claimed. After all, southbound traffic from 4th Street to Broadway already is a bottleneck of 3 lanes merging into 2, with two traffic lights in 2 blocks. Add another two high volume feeder streets (planning to serve another 1,500 vehicles!), and we are going to have chaos.

49-1

Another attempt at "spin" is the claim that the further 5mph slowing of congested traffic will be a virtue, because reduced speed will cause fewer accidents. That's what I refer to as the writers' "little joke".

49-2

In fact, in order to get up to an average speed of 21.6mph, the authors had to measure all the way from I street to The Bayshore Mall, including a mile-long stretch that has a 40mph speed limit. Clearly, there will be vast snarls of traffic at stop-and-go speeds the entire length of the Marina Center. And because some drivers exiting the Center will be headed north, the traffic light at Sixth and Broadway – already a stressed intersection – will have to become 3-stage, backing up cars on Broadway even more, impacting the traffic light at West Washington Street. If pedestrian crossings are included, that means the wait will be still longer.

49-3

The idea that people will simply accept those snarls is naïve. Drivers seeking to escape that mess will take to using side streets like Commercial, Summer, and A, which are not intended to handle such volume, and where the likelihood of accident is much greater.

Joseph Byrd
1681 Henry Lane
McKinleyville CA 95519

707.839.4080

Letter 49: Joseph Byrd

- 49-1 The comment suggests that traffic impacts would be far greater than claimed on Broadway.

As indicated in Table VII of the report, under the 2025 Cumulative Conditions, the expected p.m. peak period level of service at the mentioned intersections, assuming that all project mitigation is in place are:

Broadway and Fourth Street: LOS C
Broadway and Fifth Street: LOS C
Broadway and Sixth Street: LOS C
Broadway and Washington Street: LOS C

LOS D operation is acceptable by Caltrans; consequently the resulting LOS C would be better still. Note that by 2025 outbound traffic that formerly traveled onto Broadway at both Fourth Street and Sixth Street would be re-routed to other streets; the letter writer is correct that the volume of traffic is too high to maintain acceptable operations. That is why traffic in later years is to be redirected onto Waterfront Drive to Hawthorne (for traffic continuing south) and to both Commercial and C Streets (for traffic continuing to the north on U.S. 101). (See, e.g., Mitigation Measure O-8a.) The traffic signal at Broadway and Sixth Street would provide for protected northbound left turns, north and southbound traffic on Broadway, and westbound left – through- right from Sixth Street. Pedestrians, as the case today, would be provided a “Walk” signal across the north leg of this intersection.

Also note that traffic has increased by 1.5 percent per year on U.S. 101 in Eureka since 1980 (and perhaps even earlier), and such traffic increase is anticipated to occur with or without the project in the future. The proposed project provides the means to accommodate the higher future traffic volumes, while no plan is currently in place to accommodate future traffic without the proposed project.

- 49-2 The expected smaller number of accidents would not be the result of lower speed as the comment seems to suggest. Instead, it would result from the proposed mitigation measures, such as signal coordination and improvements to the design and operation of existing signals. (Draft EIR, page IV.O-18.) There is no statement in the Draft EIR that lower speeds would contribute to a reduction in the number of accidents.

- 49-3 The comment questions the methodology that concluded that Broadway would operate with an average speed of 21.6 mph with the proposed project during certain times of day.

The intent of measuring travel times between Downtown and Bayshore Mall is not to increase vehicle speeds, but to determine the impacts of higher traffic volumes on the ability of U.S. 101 to maintain through travel capability. Note that the 1.5 percent average annual increase in traffic volumes along U.S. 101 in Eureka would be expected to occur

in some form with or without the proposed project. If none of the mitigation were in place in 2025, average speeds on U.S. 101 through Eureka would be significantly slower, and these calculations are contained in the appendices only. Without the project in 2025 but with a 33 percent increase in traffic, levels of service at the study intersections would be far worse, with many operating at LOS F.

Subsequent studies on other projects with respect to traffic throughout Eureka reveal that project traffic would not cause any significant shifts or diversions of traffic volumes into neighborhoods of Eureka.

Sidnie Olson

From: Madroneweb@aol.com
Sent: Saturday, January 31, 2009 2:00 PM
To: DEIRcomments
Subject: comments on DEIR for Balloon Tract development

January 30th, 2009

Bruce Campbell
1158 26th St. #883
Santa Monica, CA 90403

City of Eureka Community Development Department
Sidnie L. Olson, Principal Planner
531 K Street
Eureka, CA 95501-1165

Re: Comments on DEIR for Balloon Tract development / Marina Center

Dear Sidnie L. Olson and to whom it may concern:

These are my comments on the proposed Marina Center development on the "Balloon Tract" property at Humboldt Bay. No action alternative has thorough enough analysis to gauge its impact on the environment, on residents, on construction workers, or on those who would work or otherwise use the area. Thus, if any of the action alternatives are to be pursued, first there must be a Draft Supplemental EIR which does considerable additional testing for toxics at the site -- and then analyzes those for impacts on wildlife, residents-to-be within the project, for construction workers, and for others.

50-1

There was inadequate testing for toxic materials at the site in the Health Risk Assessment, and even those were assessed for impact considering the area stayed a vacant lot -- rather than have a major development built upon it. These soils should be tested for such materials as 2,4-D, 2,4,5-T, tetrachlorodibenzo-p-dioxin, pentachlorophenol, creosote, PCB, and glyphosate, plus their contaminants and breakdown products. Also, how would excavation, construction, etc. at the site impact the churning up of toxic material which could impact land, bay, and avian species?

50-2

50-3

There was not proper economic analysis of the likely impact which more big-box stores would have on the already low wages and struggling small businesses in Eureka and the Humboldt Bay region. One can use the Bayshore Mall as an example of a development which certainly brought a downward spiral to other businesses around town.

50-4

I also call for a more thorough analysis (in Draft Supplemental and Final EIRs) regarding preferred uses in the coastal zone under the California Coastal Act. Why should this inappropriate development (with public transit serving the development merely "optional") be approved on a contaminated area on what was a slough and estuarine wetland area, and how could such a proposed development have a higher value for wetlands than cleanup and wetland restoration with some visitor-serving amenities which would be in the flow if one abided by the California Coastal Act?

50-5

There is insufficient analysis or sensitivity to concerns that there used to be one and perhaps even two Wiyot Indian villages on this very site proposed for the Marina Center.

50-6

Lastly, there needs to be more analysis about how various proposals for stimulus from the federal government (plus what may actually be received), for opening up Highway 101 to more giant STAA vehicles at Richardson Grove and Confusion Hill, possible revival of the railroad, and other projects have on the proposed Marina Center development -- and the impact on listed species of these multiple actions prioritizing more mega-stores and transport which may encourage more extraction from forests, riverbeds, and elsewhere in the county.

50-7

Thank you for your attention to my concerns on this project, and either develop a reasonable proposal for this important coastal zone area, or abandon this project.

Sincerely yours,
Bruce Campbell

A Good Credit Score is 700 or Above. See yours in just 2 easy steps!

5-464

Letter 50: Bruce Campbell

- 50-1 The comment states that there should be a Draft Supplemental EIR that addresses additional testing for toxics at the project site, and then analyzes the potential impacts of those toxics. The comment is noted.

For further discussion regarding the Remedial Action Plan for the proposed project, please see Master Response 4 and Appendix S, which detail the extensive subsurface investigations at the project site. Note that the contamination at the project site is an existing condition, and that the proposed project would excavate and remove soil at contaminated hot spots and place of clean cover material over the project site to remove exposure pathways.

- 50-2 The comment questions the adequacy of the 1996 and 2000 Health Risk Assessments and calls for further site testing. Please see response to comment 50-1, directly above.

For further discussion providing details of the Remedial Action Plan for the project site, please see Master Response 4 and new Appendix S.

- 50-3 The comment questions how site remediation would proceed and asks how it would affect wildlife near and on the project site.

Note that the contamination at the project site is an existing condition, and that the proposed project would excavate and remove soil at contaminated hot spots and place of clean cover material over the project site to remove exposure pathways. For further discussion regarding the Remedial Action Plan for the proposed project, please see Master Response 4 and Appendix S, which is the recently completed Supplemental Interim Remedial Action Plan (SIRAP). The SIRAP has received conditional concurrence from RWQCB staff.

- 50-4 The comment questions the adequacy of the “economic analysis” in the Draft EIR. The comment is noted.

Please see Master Response 1, under “Jobs / Wages Impacts” for further discussion pertinent to this comment.

- 50-5 The comment calls for an analysis of preferred uses in the coastal zone as related to the proposed project. The comment is noted. Please see Master Responses 3 and 5 for further discussion of coastal zone land use policy consistency.

- 50-6 The comments requesting archaeological subsurface survey of the project area are noted. The comment does not directly address the accuracy or adequacy of the Draft EIR. However, impacts to cultural resources, as well as mitigation measures to reduce potentially significant impacts to a less-than-significant level, are described on

pages IV.E1 through -21 Draft EIR. Please also see response to comment 40-8 and Master Response 9, which detail the survey efforts that would be undertaken.

- 50-7 The comment states that the Draft EIR should include analyses regarding various federal stimulus program proposals, incorporating them into the cumulative analysis. The comment is noted. The list of projects included in the cumulative analysis are presented in Table V-1 on page V-4. As stated on Draft EIR page V-3, the Draft EIR cumulative impacts analyses are based on a growth scenario that incorporates approving, pending, or proposed projects within the vicinity of the project. If the various federal stimulus program proposals are adopted, they would incorporate the Marina Center into their 2010 baseline conditions for any required environmental review. Please also see response to comment 13-4 for a discussion of cumulative impacts to biological resources.