

Sidnie Olson

From: dryerson2@suddenlink.net
Sent: Saturday, January 31, 2009 10:44 AM
To: DEIRcomments
Cc: dryerson2@suddenlink.net
Subject: Marina Center DEIR Comments

January 31, 2009

Sidnie Olson, AICP, Principal Planner
Community Development Department
City of Eureka
513 K St.
Eureka, CA 95501

RE: Marina Center DEIR Comments

Dear Ms. Olson:

I concur with and support the Marina Center DEIR comments submitted by CA Fish & Game, Humboldt County Public Works Dept., the Wiyot Tribe and Bear River Band, and Humboldt Baykeeper. I do not support the Marina Center Project.

141-1

All residents of our County would best benefit from a more inclusive long range master plan that covered the entire area along the Hwy 101 corridor (west to the waterfront and a block or two east of 101) from V Street in the north to Herrick Rd in the south. This area could be redeveloped so that it is integrally connected and serves as a tourist destination, cultural and community center for County residents, incubation center for independent local businesses, and more. I have a vision for this area that I would love to discuss with you and learn from your knowledge and ideas.

141-2

The advantages of master planning for the entire area described above could include:
--Eliminating the battle over Waterfront Drive extension; --Improving traffic flow to be in synch with current flow at 25-30 mph between I and E streets; --Coherent design that draws from Old Town design; --Improving safety for pedestrians, cyclists, and motor vehicles; --Creating bay views and designing to maximize everyones opportunity to enjoy the natural beauty and functions of the bay; --Fostering a sustainable economy based on local independent businesses; --Designing to decrease auto dependence and reduce VMT (helps meet AB32 requirements).

Thank you for considering my comments.

Sincerely,

Diane Ryerson
1659 I Street
Arcata, CA 95521
707-826-7750

Letter 141: Diane Ryerson

- 141-1 The comments concurring with the Department of Fish and Game comments, and expressing opposition to the proposed project, are noted.
- 141-2 The comments advocating a Master Plan for the entire area along the U.S. 101 corridor are noted.

It is beyond the scope and capability of this EIR and CEQA to analyze the environmental impacts of projects and plans not yet developed through a suggested alternative design charrette process. The Lead Agency is required by CEQA to analyze the proposed project. Alternatives to the proposed project, some of which include the uses suggested, are discussed in Chapter VI of the Draft EIR.

Comment Letter 142

Comment Letter 142

Karen Sanderson P. O. Box 125, Arcata, California 95518 707-502-4019

Karen Sanderson P. O. Box 125, Arcata, California 95518 707-502-4019

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

January 28, 2009
RECEIVED
JAN 29 2009
DEPARTMENT OF
COMMUNITY DEVELOPMENT

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

January 29, 2009
RECEIVED
JAN 02 2009
DEPARTMENT OF
COMMUNITY DEVELOPMENT

Dear Sidnie Olson,

Dear Sidnie L. Olson,

The Marina Center would negatively impact traffic patterns and traffic in and around the city of Eureka. It happened in Capitola, CA when a mall was put in on 41st Avenue, it happened when the Bayside Mall was put in on Broadway, it happened in Monterey CA when a big box store was put in Marina, it happened all over the San Francisco Bay area, it happened in other areas of the state and it will happen here. If you want gridlock on a daily basis in downtown Eureka, go ahead with the Marina Center as planned.

142-1

The Marina Center (including big box stores like Home Depot) would negatively impact many local companies (such as Pierson Building Center, Schmidbauer Building Supply, locally owned Ace Hardware Stores, Almquist Lumber, Arcata Do It Best Lumber, Forbusco Lumber and other Fortuna businesses, Mad River Lumber, The Mill Yard, Myrtle town Lumber and Supply, Resale Lumber, Alternative Building Center, Hensell Materials, Inc., Thomas Home Center, True Value Hardware, Restoration Hardware, as well as companies that sell related products and services, probably putting many companies out of business.

142-2

It happened to Daly's Department Store, Hornbrook's Shoes, Anita Dress Shop, Woolworth's and Kress stores, Bistrin's Department Store, and all the related stores on 4th and 5th between F and G streets when the Eureka Mall was put in and free mall parking out-competed downtown parking meters.

There is no excuse for placing a four story parking garage in the view area surrounding the bay. Many people would hate seeing it for years to come. There is also no excuse for placing any multi-story building in the view area surrounding the bay. This would be an example of corporations and a few people making large amounts of money at the expense of our community and many people. There are so many examples of this kind of abuse in California and around the world.

142-3

We have some resources here that are valuable and found in few other places. They are important to our major industry, tourism. It is important to protect the views we have, avoid more traffic congestion, and protect the local businesses and workers that make up our economy. It would be more economically sensible to place tourism-related low impact facilities around the bay. At the very least all environmental, traffic, economic, and other impact reports should be ordered and studied in great detail.

142-4

Please look at the problems in other communities caused by misuse of prime waterfront property. One does not have to be anti-progress or anti-growth to realize the implications of our community choices

142-5

Sincerely,
Karen Sanderson

After studying the Marina Center Draft EIR in more detail, it is obvious that the document is extremely lacking in substance, content and depth. It would be foolish and civically irresponsible to go ahead with the project based on this document.

There is a doctrine of "highest and best use" in real estate which refers to net income for a parcel of land. In this new century "highest and best use" must change focus to include long term liabilities in the net income equation, such as the loss we are experiencing in the fishing industry, loss in biologic diversity, loss in the tourism industry (our greatest money maker at this point), cost of environmental cleanup (greater or lesser depending on how it is done), loss in lifestyle amenities such as noise and traffic.

142-6

The planning for this site was done before the recent economic meltdown and resulting consumer purchasing freeze. We need to look at the future based on reality, not outmoded civic and corporate planning models. We have a low population base which can barely support the local businesses. Any major business additions will draw customers away from them. This is an isolated and rural county and will stay that way for a long time.

142-7

This site has the potential for wetlands restoration that few other sites could ever have, and this cannot be mitigated in any way. Once the site is developed as planned, it is gone for generations. We need to look forward and not be encumbered by past civic errors.

The entire site could and should be used for wetland restoration and water conservation, cutting edge hazardous materials cleanup, bio-diversity enhancement and related environmental and social arenas. It could be a model of civic responsibility and include wetland and biologic species learning opportunities, Native American sites, local history displays, even toxic cleanup displays and structures. This could be an incredible asset to Humboldt County and enhance the local college and university programs and draw researchers, students and tourists to this area.

142-8

The DEIR states that Project would significantly impact air quality and transportation. There is no way to mitigate those two environmental problems as they are entwined. A project of this size needs to draw population of approximately fifty to one hundred thousand persons to succeed. These people would come from all areas of our county on a daily and weekly basis.

142-9

Few patrons of Home Depot would take a bus to buy building supplies. Few families would take a bus from Trinidad or Orick or Fortuna to shop at the Marina Center. Automobiles are a necessity for most people in a spread out county like ours and they are a fact of life. This would massively increase automobile use and transportation and related air quality problems.

5-751

Comment Letter 142

A wetland restoration would have much less impact on traffic and related air pollution, could be designed to cleanup toxic contaminants and encompass many cultural and biologic needs in this area. The long term net income for Humboldt County would be much higher than allowing the site to be used to line developers pockets. The recent economic meltdown and resulting lifestyle changes necessitate nurturing local businesses, and bringing in a big box store which uses predatory business and labor practices would destroy many local businesses.

142-10

The DEIR states that impacts to Aesthetics, Agricultural Resources, Biological Resources, Cultural Resources, Geology, Soils, and Seismicity, Hazards and Hazardous Materials, Hydrology and Water Quality, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Urban Decay, Utilities and Service Systems, "after mitigation to be less than significant."

142-11

Impacts to Aesthetics, Biological Resources, Cultural Resources, Geology, Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise, Population and Housing, Public Services, Recreation, Urban Decay, Utilities and Service Systems are never "less than significant." The impacts from this project would harm everyone in this area in many ways for decades to come.

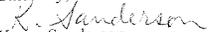
How could anyone mitigate the loss of wetland restoration and the resulting negative biologic effects on Clark Slough, Humboldt Bay and the wildlife that would be enhanced if this site was restored to wetlands? The DEIR is so arrogantly written to ignore so many real problems with this project that I hope you will not accept it. Real and factual impact reports need to be done and should include alternative uses for the parcel.

142-12

Once a five story building is put up next to a body of water, no one can see through it and it will always be an ugly blot on the landscape. Once local businesses are out of business they are gone, and the social and economic fabric of our community is degraded. This project is a giant step in bringing Los Angeles sprawl to our county. If we wanted to live with L. A. sprawl, we would live there.

142-13

People live in Humboldt County for the lifestyle and if this project goes forward it will damage that lifestyle forever.

Sincerely,

Karen Sanderson

Letter 142: Karen Sanderson

- 142-1 The comment states that traffic patterns around the city would be negatively impacted by the proposed project.

Please see responses to comments 31-1, 32-9, and 38-4. Response to comment 31-1 explains that traffic is expected to increase 33 percent with or without the proposed project by 2025 and that the proposed project would include mitigation measures to reduce most significant impacts. Response to comment 32-9 addresses potential impacts to Sixth and Seventh Streets. Finally, response to comment 38-4 addresses potential impacts to Henderson Street and Harris Street.

- 142-2 The comment states that the proposed project could negatively impact local companies. The comment is noted.

Please see Master Response 1, under “New Recessionary Conditions” and “Potential Local Store Closures.”

- 142-3 The comment’s concern on the height of the proposed buildings are noted. As stated in the outline on page III-18 of the Draft EIR, under F. Project Entitlements and Approvals, and reiterated on page IV.A-6 under Impact A-3, the proposed project would be subject to site plan review and architectural review by the City of Eureka. Design features specific to the site plan and buildings would be established at that time. The Design Review Committee will review the site plans and designs to ensure that EMC Section 156.054 (D) goals are met.

- 142-4 The comments expressing desire to preserve views, sustain tourism, avoid traffic congestion, and protect local businesses are noted.

The potential environmental impacts of the proposed project—including impacts to traffic, aesthetics, and urban decay—are detailed throughout the Draft EIR. Alternatives to the proposed project, some of which include the uses suggested, are discussed in Chapter VI.

- 142-5 The comment suggesting an analysis of other communities’ uses of waterfront property is noted. It is beyond the scope of this Draft EIR to first describe other proposed projects in the coastal zone, and then analyze those projects’ environmental impacts in an attempt to draw comparative conclusions. The Lead Agency is required to analyze the environmental impacts of the proposed project, as well as a reasonable range of feasible alternatives, which it has done (see Chapter V Draft EIR). Also see coastal zone issues addressed in Master Responses 3 and 5 of this Final EIR.

- 142-6 The comment regarding “highest and best use” is noted. The Draft EIR analyzes potential environmental impacts from the proposed project. “Highest and best use” is a term used in the real estate appraisal industry to describe the use that would generate the highest

return on investment. The Draft EIR does not address “highest and best use.” From a planning perspective, the opinion of “highest and best use” depends on several factors. As stated in the Draft EIR, the Lead Agency is required to analyze the proposed project pursuant to CEQA.

- 142-7 The comment expresses opposition to the project and states that alternative uses should be considered. The Marina Center project includes the creation of contiguous estuarine wetlands at the south end of the project site at an acreage exceeding the extent of the existing combined degraded seasonal and estuarine wetlands (mitigation ratio of 1.05:1). These restored wetlands are anticipated to be of much higher quality than those currently onsite.

As for alternative uses, the Draft EIR does evaluate a reasonable range of alternative uses. Other than possibly converting the entire project site to wetland restoration – a project alternative that is considered and rejected under the City’s initial screening criteria for a number of reasons – the comment does not provide any list of possible alternatives that should be considered. It should be noted that this site is also not well-suited for the type of wetland restoration project that the comment seems to be alluding to. The site is within a larger industrial and commercial area, and surrounded by City streets and rights-of-way or existing industrial or commercial uses. With the Marina on the bay-side of Waterfront Drive also renders restoration impractical.

Please also see Master Response 1, under “New Recessionary Conditions.”

- 142-8 The comment expresses dismay that the project site would be developed. The Marina Center project includes the creation of contiguous estuarine wetlands at the south end of the project site at an acreage exceeding the extent of the existing combined scattered, degraded seasonal and estuarine wetlands (mitigation ratio of 1.05:1). These restored wetlands are anticipated to be of much higher quality and biological value than those currently onsite. Please also see response to comment 8-6 on global warming and sea-level rise.

The comment also suggests other uses for the project site. As discussed in Chapter VI, Alternatives, a Wetlands Restoration and Public Park alternative is screened out of detailed analysis because it would not meet the objectives of the proposed project and would not be feasible.

- 142-9 The comment states that there is no way to mitigate air quality and transportation impacts because they are intertwined. The comment is noted. Mitigation measures to address impacts to air quality and transportation are discussed in Chapters IV.C and IV.O, respectively.

- 142-10 The comment suggesting wetland restoration in place of the proposed project is noted. Alternatives to the proposed project, some of which include the uses suggested, are

discussed in Chapter VI. As shown there, some alternatives screened and analyzed would reduce significant impacts to a less-than-significant level.

- 142-11 The comment questions the definition of “less-than-significant impacts” and states that no impacts are ever “less than significant.”

Please see responses to comments 64-4 and 88-1, which explain that the Draft EIR was prepared pursuant to CEQA Guidelines and explains the determination of the baseline condition against which the proposed project is measured. Significance levels are determined by the Lead Agency pursuant to CEQA Guidelines.

- 142-12 The comment states that the proposed project has a significant and unavoidable impact because it does not allow for a course of action similar to the Wetlands Restoration and Public Park alternative. The comment uses a line of reasoning that the project site could be fully restored as a wetland area, and therefore the proposed project has a significant and unavoidable impact because it causes the loss of those wetlands, despite the fact that there is no current proposed plan to create or restore those wetlands.

Under CEQA, the proposed project cannot be said to have a significant and unavoidable impact to an alternative.

Analysis of the existing wetlands and hydrology on the project site and the impacts of the proposed project are included in Chapter IV.V, Biological Resources, and Chapter IV.H, Hydrology and Water Quality. These chapters include the identification of impacts and mitigation measures to reduce impacts to less-than-significant levels. Please also see response to comment 98-4, which explains that the proposed project would have a beneficial impact to onsite wetlands.

- 142-13 The opinion of the proposed project’s height and bulk is noted. As stated in the outline on page III-18 of the Draft EIR, under *F. Project Entitlements and Approvals*, and reiterated on page IV.A-6 under Impact A-3, the proposed project would be subject to site plan review and architectural review by the City of Eureka. Design features specific to the site plan and buildings would be established at that time. The Design Review Committee will review the site plans and designs to ensure that EMC Section 156.054 (D) goals are met.

The comment’s expressed concern about the proposed project’s impacts on local businesses is noted. Please see Master Response 1 for a discussion of urban decay.

Sidnie Olson

From: Jon Hafstrom [starstrm@suddenlink.net]
Sent: Saturday, January 31, 2009 4:49 PM
To: DEIRcomments
Subject: Marina Center

Sidnie L. Olson, Principal Planner
City of Eureka Community Development Department

Dear Sidnie Olson:

I am opposed to the Marina Center. We don't need any more places to shop. Many retail businesses have already failed, leaving empty storefronts throughout Eureka. The remaining businesses would be further threatened by the Marina Center. National chain stores only offer low paying jobs and send profits out of the area. Let's support local businesses; we don't need the Marina Center.

143-1

I do support having the railroad company clean up the mess they made of the Balloon Tract. I also support using the land for coastal dependent industry, and visitor-serving commercial recreational facilities.

143-2

Sincerely,
Lynne Sarty
Eureka, CA
442-7569
January 31, 2009

Letter 143: Lynne Sarty

- 143-1 The comment expressing opposition to the proposed project and its potential impacts to local businesses is noted. Please see Master Response 1, under “Jobs / Wages Impacts,” “National Stores vs. Local Stores,” and “Potential Local Store Closures.”
- 143-2 The comment advocating for cleanup of the project site is noted. For further discussion regarding the Remedial Action Plan for the proposed project, please see Master Response 4 and new Appendix S.

Sidnie Olson

From: Glenn & Janis Saunders [glennsaunders@suddenlink.net]
Sent: Tuesday, December 16, 2008 9:40 AM
To: DEIRcomments
Subject: Marina Center

We would like to add our names to the supporting list for the Marina Center [144-1

Glenn & Janis Saunders
Trinidad, CA.

Letter 144: Glenn and Janis Saunders

144-1 The comment in support of the proposed project is noted.

Sidnie Olson

From: skeeterdog1@sbcglobal.net
Sent: Friday, January 30, 2009 9:15 AM
To: DEIRcomments
Subject: Marina

Allow the Marina Center to go forward and BUILD!! [145-1

Dave & Jackie Saunderson
442-6064

Letter 145: Dave and Jackie Saunderson

- 145-1 The comment in support of the proposed project and urging its construction is noted. As stated in Chapter I, Introduction, the proposed project requires several approvals from the City of Eureka and other public agencies. The EIR is a document used as a resource to aid in that decision-making.

Sidnie Olson

From: Pastor Don Schatz [pastordon@lutheranchurcharcata.org]
Sent: Wednesday, December 17, 2008 10:41 AM
To: DEIRcomments
Subject: Marina Center

Thank you for the opportunity to write in strong support of the Marina Center project. The EIR accompanying the proposal is thorough and complete. The benefits of the project to the larger community are enormous. The area desperately needs jobs. Too many local employers are comfortable paying minimum wage. The county's median income is \$20,000 less than the national average. In my brief 16 months in the area, it has nevertheless become clear that local and county governmental entities have served to protect the wealthy minority of the area at the expense of creating a too-large underclass of poorly housed and poorly fed individuals and families. It is time for local government to serve and advocate for the needs of the larger community.

146-1

The Marina Center project as proposed by Security National is a reasonable approach to use of the Balloon property. The willingness of the developer to take on the cost of cleaning up the property is laudable. The mixed use nature of the plan provides for a wider range of benefits to the public. The addition of residential units and the inclusion of the Discovery Museum hold out the vision of an 'urban village' style of development that is common throughout the country. The inclusion of ground-floor retail space below apartment and condominium-style properties is likewise understood nationally as part of a reasonable solution to 'urban sprawl' (a concern even for a smaller city). It also creates less demand on services such as police and fire than does an ever-expanding city limit.

146-2

I encourage the Community Development Department and the City of Eureka to view the Marina Center proposal favorably, acting in the interests of the larger community, with an eye toward the reasonable and responsible development of a significant property.

Pastor Don Schatz, D.Min.
Lutheran Church of Arcata
PATH Student Ministry
Humboldt State University
College of the Redwoods
Arcata, CA
707-822-5117

Letter 146: Don Schatz

- 146-1 The comment in support of the proposed project is noted. Regarding the potential employment increase from the proposed project, please see Master Response 1, under “Jobs / Wages Impacts.”
- 146-2 The comments summarizing the proposed project’s potential benefits is noted. Please see Master Response 4 regarding remediation of the project site. In addition, the proposed project’s potential impacts to police and fire services are discussed in Chapter IV.M, Public Services of the Draft EIR.

Sidnie Olson

From: BrendaLou [brendalou8@aol.com]
Sent: Thursday, January 29, 2009 12:24 PM
To: DEIRcomments
Subject: Marina Center

I am writing in support of the Marina Center project. I have lived in Eureka afor 37 years, raised my family here and now my grandchildren are enjoying the benefits of living in town. I believe the Marina Center Project will greatly benefit our community by cleaning up an unsightly and unusable space and turning it into an opportunity for our community members to shop, play & live. I am in favor of Home Depot coming to our area. We own and operate a Construction Company as well as a Retail Store within the city limits and while we shop at local existing businesses (Pierson's and more) that we are now spending thousands of dollars each year out of the area at Home Depot. Those sales tax \$\$ could be benefiting our community.

147-1

147-2

Many jobs will be created locally both with the construction and the new businesses. I think the Marina Center will breathe new life into our Downtown area....I am contemplating a move to the general area when the project commences.

147-3

BrendaLou Scott
Scottie Dog Quilts
301 W. Harris St.
Eureka, CA 95503

(707)444-9662
www.scottiedogquilts.com
Blog: www.brendalousblog.blogspot.com/

Letter 147: BrendaLou Scott

- 147-1 The comment in support of the proposed project is noted. The comment supporting cleanup of the project site is also noted. Please see Master Response 4 regarding site remediation.
- 147-2 The comment stating that sales tax dollars generated by the proposed project could benefit the community is noted. Please see Master Response 1, under “Fiscal Impacts to the City of Eureka and Other Jurisdictions.”
- 147-3 The comment regarding the potential employment increase generated by the proposed project is noted. Please see Master Response 1, under “Jobs / Wages Impacts.”

Comment Letter 148

Comment Letter 148

Sidnie Olson

From: Rick Siegfried [humboldtrick@yahoo.com]
Sent: Saturday, January 31, 2009 5:13 PM
To: DEIRcomments
Subject: Marina Center DEIR comments

31 January 2009

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

Re: Marina Center DEIR

Dear Sidnie Olson:

My comments on the Marina Center Draft Environmental Impact reports are as follows:

CHAPTER IV.A Aesthetics

Regarding Impact A-3, the renderings look like some ghasly clones from the San Francisco Bay Area were plopped down next to our Humboldt Bay. The architecture looks like nothing that exists in our County, and doesn't look like it belongs in our County. Is this a real reflection of our "Victorian Seaport"? Does it look anything like a "Victorian Seaport"? Visually, this project is an ugly monstrosity.

Aesthetically, this project has a negative impact on the community.

CHAPTER IV.C Air Quality

Mitigation Measure C-2a does not quantify the number of electrical outlet for electric/hybrid vehicles, and actually opens the possibility of none being installed due to being inappropriate or not feasible. The impact of pedestrian and bicycle travel zones on the reduction of emissions is not analyzed. I believe synchronized traffic lights would be the domain of CalTrans, not CUE IV. The project is supposed to accommodate public transit, but I see no bus stop turn-outs indicated in the plans.

It would also seem that the Health Risk Assessment (Winzler and Kelley, 2006), which is used for analysis by the lead agency, is flawed by inadequate data sets. These flaws are: Cited data from the Jacobs Monitoring Station were cited even though they were NOT available at the time the Risk Assessment was prepared. The Eureka 1st Monitoring Station is located upwind from the prevailing wind patterns of the project. It omits analysis of project impacts on immediate residents. Cumulative impacts are inadequately described, quantified or analyzed. Cumulative impacts that are ignored are: current delivery vehicle

148-1

148-2

148-3

emissions; current PM10 contributors; adverse effects of PG&E's Repowering Plant; transportation corridor effects outside the project's immediate vicinity; contribution of combustion of wood for heat in a large number of Eureka homes.

Regarding air quality, this project has a negative impact on our community.

CHAPTER IV.E Cultural Resources

I am not Native American, but I believe we need to respect the wishes of Native American peoples (better late than never, I guess). The Wiyot Tribe believes there is one or maybe two Wiyot villages within the proposed project's boundaries. The Tribe feels that monitoring during construction will not be sufficient. The Tribe requests testing for site identification in sensitive areas, and monitoring of construction during all ground-disturbing activities. Without this testing, this project will have a negative impact on the perception of our community by local Native Americans.

CHAPTER IV.G Hazards and Hazardous Materials

Recent samplings by Humboldt Baykeepers has found dioxins and furans in site soils and sediments. These substances are not indicated in the DEIR, indicating that their analysis of known contaminants is incomplete. Also, levels of known contaminants are not quantified.

The Health Risk Assessment was completed with inadequate data. Dioxins and furans were not considered in the assessment. Risk was based upon exposure pathways for a vacant lot, not for the proposed uses, including residential. Toxicity values for chemicals at the site have been updated by the EPA since the Addendum was prepared and should be reconsidered. There was no analysis of ecological risk (risk to wildlife).

The DEIR states that there is potential for contamination to remain on site after remediation. This should be quantified to assure safety for the site's proposed uses. Mitigation Measures G-1a to G-1e defer identification of actual cleanup measures to a future date. The project applicant should be required to prepare a site-specific remediation plan before project approval. If not, how can the City be assured of sufficient cleanup of the property?

The health risks of this project will have a negative impact on our community.

CHAPTER IV.I Land Use and Planning

This project, while masquerading as smart growth, is a hodgepodge of uses thrown together willy-nilly to justify a big-box store. Its balance is highly questionable. In addition, ALL of the proposed Marina Center uses are in the LOWEST PRIORITY GROUP (#2) of the Allowable Uses in the Coastal Zone. I personally believe that State Law in the Public Resources Code (PRC) should be obeyed: "Visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation SHALL HAVE PRIORITY over PRIVATE residential,

148-3 cont.

148-4

148-5

148-6

148-7

148-8

5-766

Comment Letter 148

Comment Letter 148

general industrial or general commercial development, but not over agriculture or coastal-dependent industry." (PRC 30222) This project is NOT coastal-dependent.

148-8
cont.

This is the premiere undeveloped property in the City of Eureka. It should be developed for the enjoyment and use of the citizens of Eureka, not for the profit and ego boost of a single resident. The DEIR's analysis of Alternatives is incomplete, totally inadequate, and misleading, at best.

148-9

This is not the best project for this parcel. It will have a negative impact on our community.

CHAPTER IV.L Population and Housing
Contrary to popular local belief, more housing is NOT needed in this area. Every block in this City has houses for sale, and spec houses around the County sit vacant with "For Sale" signs in their yards.

148-10

The increase in housing units from this project will have a negative impact on our community.

CHAPTER IV.N Recreation
Bike and walking trails already exist throughout the City. Sitting on a bench in a wetland is NOT recreation. Since this project sits right next to Humboldt Bay, I am surprised that there is no recreation linked to the Bay. This project does nothing substantial to increase recreational opportunities.

148-11

This project will have a negative impact on recreation on the Bay in this community.

CHAPTER IV.O Transportation
Wow! This project is going to make 4th & 5th Streets and Broadway a MESS!!!! 15,669 new vehicle trips per weekday? This area can't handle that traffic load. Impact O-1 and Impact O-8 will admittedly remain significant even after mitigation efforts. Public transportation would help but is left as optional, and is not offered within the project area.

148-12

Bicycle and pedestrian traffic is not accommodated on the Broadway side of the project. All concessions to bicycles and pedestrians are made on Waterfront Drive (where all exiting traffic is to be directed, creating a hazard for those on foot or on bikes). 4th, 5th and Broadway will become even more dangerous for pedestrians and bicyclists to cross and navigate with more vehicular traffic and lack of road shoulders.

148-13

Traffic studies for this project were NOT done during tourist season, making the conclusions suspect.

148-14

There is no discussion of mitigating traffic congestion caused by this project, nor is there any analysis of the impact of traffic diversions through surrounding neighborhoods.

148-15

Finally, each residence in the project is given ONE parking space. According to AAA, the average Eureka residence has 3.5 cars. Where will the other 2.5 cars park?

148-16

Traffic and congestion from this project will have a negative impact on our community.

CHAPTER IV.P Urban Decay
I have worked and owned a business in Old Town for almost 30 years. I feel I have direct experience with this issue, having seen the effects the Bayshore Mall, Costco and Target have had on the Old Town/Downtown area.

The DEIR states that the Marina Center's potential for causing urban decay in the greater Eureka area is "less-than-significant". The study completely ignores the most obvious real-life example: no mention is made of the effects that the Bayshore Mall had on the greater Eureka area. The opening of the Bayshore Mall had major negative impacts mainly effecting the Old Town/Downtown areas, but also having a negative effect on the Eureka Mall and Henderson Center. These effects were evident as far away as Fortuna, which lost stores in the Downtown/Main Street areas; Arcata, which had store closings associated with the Mall's opening; and to a lesser extent, McKinleyville also had a few related store closings.

The City of Eureka recognized, after the fact, the damage caused to the Old Town/Downtown districts. This was evident in the closure of many businesses in the area and a resulting decay of buildings and storefronts. As a result, the City implemented the Main Street Program. In conjunction with that program, the City of Eureka invested in the infrastructure of the areas with improved lighting, sidewalks, etc. This has slowly (and painfully) resulted in the Old Town/Downtown area returning to the "gem" of Eureka.

148-17

In the meantime, the openings of both Costco and Target have been felt in the Old Town/Downtown area. Some stores have closed as a result, and others have had to augment or shift their focus to stay alive.

The lack of demand for retail & professional space has resulted in many upper level office spaces in Old Town/Downtown changing from dentists, lawyers, doctors, etc. to non-profit and governmental organizations, reducing the tax base of the City. The addition of more retail space will not reverse this trend.

When locally-owned stores close in favor of large chain stores and big-box retailers, store owners become workers (changing the social fabric of the community), and much of the profit from the retail sales leaves the area bound for corporate headquarters. This also encourages urban decay: the non-local corporations don't have the same personal investment in the community—they don't live here! When sales drop, they have no real motivation to stick it out. They simply pull up the carpet and leave, encumbering the community with any messes this creates.

If retail space is so sorely needed, then why is the Boardwalk project sitting idle? This prime waterfront property has been vacant for 16

5-767

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years! Why is that? Also, there are many vacant retail spaces throughout Eureka; one person counted over 125 vacancies! The study's analysis of the scarcity of retail space is absolutely wrong!

148-17
cont.

The current economic climate in this country (and the world) does not warrant the addition of retail space to the local community. Where will the money come from if not from other local retailers? Will this additional spending money appear from thin air as though by magic? No! If this project goes through as planned, stores will close throughout Eureka resulting in vacant, run-down buildings and decaying infrastructure. The City's sales tax revenues will just shift from many mom-and-pop stores to a very few big-box and major chain retailers. Wake up! It's been done before: we've seen this happen in very recent history!

148-18

The Old Town/Downtown area is the heart and soul of Eureka. It is what gives this City its unique and special flavor! It would be folly for the City of Eureka to basically throw away all the investments made in the Old Town/Downtown area by allowing this project to proceed.

148-19

This project will create urban decay and will have a negative impact on our community.

CHAPTER V Impact Overview

This overview ignores so many issues, many but not all listed above, that the Report becomes obviously flawed, inadequate and misleading, whether intentional or not.

148-20

CHAPTER VI Alternatives

In Section C. Screening for Alternatives, Step 1. Define Basic Objectives, #1 seems redundant—I believe Eureka is already the retail and employment center of Humboldt County. This project will NOT add to that; if anything it will detract from that goal through urban and social decay. In addition, the current economic climate makes this idea ludicrous. #2 seems to require economic viability of the mixed use project. Economic viability has NOT been shown for this project. #3 seems to connect cleanup with development, not a necessary connection. Also, there is no necessity for this project to be located in the Redevelopment Zone other than the wishes of the developer. It is interesting how the Project's Basic Objectives are written so that only this project in that location could meet those "objectives"! I guess the basic objective of the project is to do this project!!! The deception written into these objectives is as transparent as a brick wall.

148-21

Step 3. Develop Broad List of Potential Alternatives, the list of alternatives (at least those for the property in question, not for the project itself) is limited to 4 alternatives, with three being alternatives for this specific project and the other being "No Project". This is hardly a "Broad List"! I believe this step requires alternative USES for THIS PROPERTY, not alternative variations on the project or alternative SITES for the project. So, in this respect, this requirement has hardly been met, and seems to have been intentionally side-stepped.

148-22

I suggest a REAL alternative. How about a museum dedicated to the Wiyot Tribe as well as other local Tribes, possibly with a connection to a memorial on Indian Island. The site could also have tourist/recreation-related businesses such as boat rentals with access to the Bay, or a fishing supplies store; a wetlands area with informational signage; perhaps some sort of small camping/RV facility; basically recreation-based usage with appeal to both locals and tourists. This prime Eureka parcel should NOT be wasted on more, ugly retail/industrial/residential structures. This is a prime spot to celebrate the very best of what this area has to offer: the great outdoors.

148-23

IN CONCLUSION, this Report seems to be terribly inadequate in its assessment of the project's effect on the surrounding areas, from horrendous traffic congestion, to the level of cleanup the site will require, to the effects the opening of the project will have on the rest of Eureka's retail districts. Analyses have been incomplete, outdated data with limited scope has been used, in many instances data has not been quantified, and no site-specific remediation plan has been submitted, so approval of cleanup and this DEIR cannot possibly be made. This Report is lacking in so many substantial areas that approval should be denied without a more in-depth and accurate DEIR.

Sincerely,
Rick Siegfried
2125 18th Street
Eureka, CA 95501

5-768

Letter 148: Rick Siegfried

148-1 The opinion of the preliminary project renderings is noted. As stated in the outline on page III-18 of the Draft EIR, under F. Project Entitlements and Approvals, and reiterated on page IV.A-6 under Impact A-3, the proposed project would be subject to site plan review and architectural review by the City of Eureka. Design features specific to the site plan and buildings would be established at that time. The Design Review Committee will review the site plans and designs to ensure that EMC Section 156.054 (D) goals are met.

148-2 The comment states that restriction of traffic could reduce emissions. Pedestrian and bicycle zones are typically established in the congested core of dense, major cities such as London, New York and Asian cities such as Singapore. New York recently converted portions of Broadway between 42nd and 47th Streets to pedestrian and bicycle use only, and San Francisco is starting the planning process for prohibition of cars and trucks on Market Street. Eureka is distinguishable from major cities such as London or New York, and restricting traffic in the area is not a reasonable or feasible strategy for encouraging reductions in vehicle travel and curbing air emissions because there is insufficient residential and commercial density to support vehicle restrictions. The project does provide a pedestrian and bike-friendly site with on-street parking, slow speeds, sidewalks, and retail below offices and residential uses. The EIR, however, must still evaluate estimated vehicle traffic to and from the project in order to inform decision-makers and the public about the potential environmental impacts associated with the project.

The comment is correct that traffic light synchronization is the domain of Caltrans, but also the City of Eureka. The traffic signals along Broadway north of Henderson are not currently synchronized because of the large disparity in required cycle lengths (i.e., the total time it takes a signal to serve all movements on all approaches). To properly coordinate traffic signals, the cycle lengths need to be reasonably similar along a route. The project mitigation would do much of the needed work in upgrading and synchronizing the signal system along U.S. 101 in Eureka, which the Draft EIR acknowledges would require coordination and approval from Caltrans. Moreover, traffic light synchronization would need to be implemented by Caltrans as well. The City and Project Applicant have met with Caltrans to begin this process, and thus believe that Caltrans would accept some form of synchronization. And once synchronized, coordinated signals commonly result in a 30 percent reduction in travel time along a route as well as over a 50 percent reduction in stops and delays at red lights.

The comment also questions whether public transit would be accommodated by the proposed project. With respect to public transit stops, please see response to comment 52-25, which explains the potential demand for public transit within the proposed project.

- 148-3 The comment states that the HRA used inadequate data sets, inappropriately citing data from the Jacobs Monitoring Station, and that Humboldt County has a high incidence of cancer risk.

The health risk assessment in Appendix E does not cite the Jacobs Monitoring Station. The weather data used in the analysis is provided in a database compiled by the California Air Resources Board. The database provides weather data for wind direction, temperature, and air inversion modeling. The appropriate values from the database are selected based on the site location coordinates. If the closest weather station represented in the database does not have a particular parameter, such as wind direction, data from the next nearest station with appropriate data is selected.

Please see Master Response 2, which explains that Humboldt County does not have a high ranking for risk of cancer.

- 148-4 The comment requests subsurface archaeological investigations on the project site. Please see Master Response 9 and response to comment 134-4, which explain the revised Mitigation Measures E-2a and E-2b that would include subsurface archaeological investigations.

- 148-5 The comment incorrectly states that contaminants in the soils are not discussed in the Draft EIR, although they are cited on page IV.G-6 of the Draft EIR. The comment also states that toxicity levels for specific chemicals have been updated by the EPA.

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

- 148-6 The comment states that the Health Risk Assessments did not include furans and dioxins. The comment also states that the risk to wildlife is not addressed. The comment is noted.

For further discussion regarding the health risk assessment for the proposed project, please see Master Response 4 and new Appendix S. These sections detail the numerous investigations of the project site, including for furans and dioxins.

With regard to ecological risks, please Impacts G-1 through G-9 (pages IV.G-19 through IV.G-26) discussed potential impacts related to hazards and hazardous materials. In addition, potential impacts to wetlands and associated habitats are discussed under Impacts D-1 through D-8 on pages IV.D-18 through IV.D-34. Note that the contamination on the project site is an existing condition, and that the proposed project would excavate and remove contaminated hot spots, as well as remove exposure pathways.

- 148-7 The comment expresses concern that toxics could still be in the subsurface after site remediation. The comment is noted. For further discussion regarding the Remedial Action Plan for the proposed project, including excavation and removal of contaminated hot spots, please see Master Response 4 and new Appendix S.

- 148-8 The comment accusing the proposed project as masquerading as smart growth is noted, as are comments related to priority uses within the coastal zone.

Regarding smart growth, please see response to comment 128-1, which explains that the proposed project includes many characteristics of smart growth. Regarding priority land uses in the coastal zone, please see Master Responses 3 and 5, which discuss the Local Coastal Program Land Use Plan and the Coastal Act.

- 148-9 The comment suggesting that the project site be developed for other uses is noted. Please see response to comment 16-239, which discusses alternatives to the proposed project. Please also see Master Response 3, which explains that the project site is not owned by the City of Eureka. The City of Eureka is Lead Agency for the proposed project pursuant to CEQA and is required to analyze the potential environmental effects of the proposed project.

- 148-10 The comment states that additional housing is not needed in the area and that the proposed additional housing would have a negative impact on the community. The Draft EIR's population and housing analysis in Chapter IV.L evaluated the population impact of the estimated 122 new residents that would be associated with the proposed addition of 54 new housing units at the project site and concludes that this level of increase would have a less-than-significant adverse impact on the community.

- 148-11 The comment states that sitting on a bench is not recreation. The comment is noted.

Recreational facilities and spaces are categorized as either passive or active, depending on the intensity of activity by their users. For example, tennis courts are considered active recreational facilities, while benches are considered passive facilities. Trails are passive recreational facilities. The proposed project's trail/walkway and benches around the wetland are considered recreational spaces.

As shown in Figure III-2 on page III-5, the project site does not have direct recreational access to the bay. Waterfront drive is between the site and the bay. Given the Project Applicant does not control the waterfront, waterfront recreational uses are not proposed.

As stated on Draft EIR pages IV.N-2 through IV.N-4, the proposed project would have a less-than-significant impact on recreational facilities. It would not affect the existing ratio of park space per 1,000 residents, it would expand recreational opportunities through the construction of the pedestrian and bicycle path and wetland, and is located in an area adequately served by existing regional, community, and neighborhood parks.

- 148-12 The comment states that the proposed project would cause a traffic mess. Please see the response to comment 31-1, which explains that traffic on Broadway would increase 33 percent by 2025 with or without the proposed project, and that the mitigation measures identified in the Draft EIR would reduce almost all potential significant impacts to less-than-significant levels. Please also see response to comment and 32-9 regarding

potential impacts to nearby streets. Also, response to comment 52-25 addresses the feasibility of a more extensive mass transit service for the proposed project.

- 148-13 The comment expresses concerns regarding bicycle and pedestrian accommodation on Broadway.

Please see response to comment 33-3, which discusses the proposed bike path connection via Broadway and the potential effects on pedestrian circulation. Please also note that sidewalks exist along both sides of Broadway, Fourth and Fifth Streets, and additional signals on Fourth and Fifth Streets at Commercial and C Streets would be provided which would improve pedestrian access crossing these one-way streets.

- 148-14 The comment expresses concern that traffic data collected in the traffic impact study were not collected during the tourist season. The comment is noted. Please see response to comment 66-7, which explains the methodology used to account for traffic data collection during off-peak times of year.

- 148-15 The comment incorrectly states that there is no discussion of traffic impact mitigation. Please see the response to comment 31-1, which explains that the mitigation measures identified in the Draft EIR would mitigate almost all traffic impacts to less-than-significant levels. Please also see responses to comments 32-9 and 40-2, which addresses traffic on nearby streets. Please also see Master Response 7, which discusses trip distribution used for the traffic impact analysis.

- 148-16 The comment suggests that demand for residential parking onsite would be higher than the proposed supply of parking spaces for project residents.

The analysis of potential parking impacts associated with the project is presented on pages IV.O-44 and IV.O-45 of the Draft EIR. As stated, a shared parking analysis (i.e., how different land uses “share” a given parking space at different times of the day) for the proposed land uses (including the 54 residential units) found that the maximum demand for parking would be less than the provided spaces, excepting in the month of December when the total parking demand would at times exceed available parking by as many as 94 spaces. The residential units would have one reserved parking space, but residents would be able to park in other onsite spaces.

- 148-17 The comment makes several statements regarding the potential for the proposed project to result in urban decay.

Please see Master Response 1, under “National Stores vs. Local Stores,” “Vacancy in the City of Eureka,” “The Effect of the Bayshore Mall on Local Businesses,” and “Potential Local Store Closures.”

- 148-18 The comment expresses concern about the current economic climate in relation to the proposed project. Please see Master Response 1, under “New Recessionary Conditions.”

148-19 The comment states that allowing the proposed project to proceed would throw out all of the investment made in Downtown and Old Town. The comment is noted. Please see Master Response 1, which addresses the potential for the proposed project to result in urban decay in further detail.

148-20 The comment stating that the Impact Overview chapter ignores issues is noted.

As stated on Draft EIR page V-1, the Impact Overview section summarizes the findings with respect to significant, unavoidable environmental impacts, significant irreversible environmental changes, cumulative impacts, growth-inducing impacts of the proposed projects, and effects found to be less than significant. It is not intended to be a detailed discussion of potential environmental impacts, which are discussed in Chapter IV.

148-21 The comment questioning the completeness and methodology of the alternatives analysis is noted.

As stated in Chapter VI, Alternatives, alternatives selected for evaluation should meet the basic project objectives, which include the creation of a destination retail center. As detailed in the chapter, of the 24 alternatives screened for detailed analysis, 18 of them met most of the basic objectives of the project. However, only the Reduced Footprint Alternative, Limited Industrial Zoning Alternative, and the Shoreline Property Alternative are also determined to be feasible and to either avoid or substantially lessen at least one significant impact. Please also see responses to comments 16-239 and 16-242, which explain that the Draft EIR includes a reasonable range of alternatives.

As stated in Chapter IV.P, Urban Decay, the proposed project would have a less-than-significant impact on urban decay. Please see also Master Response 1.

The EIR analyzes the potential environmental effects of the proposed project, pursuant to CEQA. The City Council will make its determination on the proposed project based on a number of variables, including but not limited to economic, environmental, and social reasons. The economic viability of the proposed project is beyond the scope of CEQA and this Draft EIR.

148-22 The comment stating that not enough alternatives are analyzed is noted. As detailed in Chapter VI, Alternatives, 24 separate alternatives are screened for further analysis in the Draft EIR. Please see response to comment 16-239.

148-23 The comment suggesting other uses for the project site is noted. An analysis of alternatives to the proposed project is provided in Chapter VI of the Draft EIR. Please see responses to comments 16-9, 16-239, and 16-242, which explain that the Draft EIR includes a reasonable range of alternatives. Alternatives containing uses similar to those described could be the Tourism Use Alternative, the Coastal Dependent Industrial Zoning Alternative, the Wetlands Restoration and Public Park Alternative, and the Limited Industrial Zoning Alternative, which are considered in Chapter VI of the Draft EIR.

2010 FOXWOOD DR.
Eureka, CA 95503

1-29-09

Community Development Dept. -

This letter is in response to requests for public input into the Marina Project - Home Depot + waterfront housing.

At retirement I moved to Eureka from So. Calif. 5 yrs. ago. The population there allowed for an over abundance of various big box stores where the customer was just a number not a person.

The first thing that impressed me about Eureka/Arca area was the friendliness, helpfulness, personal concern/ service of the local business community to its customers.

Statements such as "Home Depot will create jobs" - true to a point if one looks no further. So many local stores + businesses have already been forced to close in town. If a big box retail store is allowed to be built, consider how many more independent, family owned, local businesses would need to close + lay off workers - e.g. lumber yards, garden centers/nurseries, home decor/paint/window products + services, etc., etc. ... Let's not encourage more urban decay in Eureka!

149-1

Imagine how much Home Depot money would be shipped to corporate offices instead of being reinvested/spent here in Humboldt Co. The potential loss to the local economy and community would be huge.

149-2

'New waterfront housing' is mentioned in the report. Existing waterfront housing is already unaffordable + vacant in Eureka. These hard economic times do not produce buyers.

149-3

The most obvious concern is worsening of traffic congestion in + around the development area, as well as increased traffic on the many feeder residential streets.

149-4

In conclusion, I believe the size of our area will not support a big box store without serious damage to local business/rural environment most of us desire.

Home Depot is currently closing many stores/laying off workers. Why would a Eureka store not suffer the same fate, leaving us blighted in its wake?

149-5

The price we would have to pay is too dear.
My vote is NO!

Thank you for your consideration.

RECEIVED

JAN 30 2009
DEPARTMENT OF

Sincerely,
Elaine Skelly
447-2747

Letter 149: Elaine Skelly

- 149-1 The comment expresses concerns that the proposed project would negatively impact existing local stores. The comment is noted. Please see Master Response 1, under “Potential Local Store Closures.”
- 149-2 The comment expresses concerns regarding the fiscal impact of a national chain on the City of Eureka. Please see Master Response 1, under “National Stores vs. Local Stores.”
- 149-3 The comment states that existing waterfront housing is unaffordable and vacant. The comment further implies that the current economic downturn would ensure insufficient sales demand for the project’s proposed new housing. The Comment is duly noted. As shown in Chapter IV.L, the Draft EIR’s housing and population analysis considered current and historical local housing vacancy rates in its analysis and findings.
- 149-4 The comment expresses concerns about traffic congestion around the project site.
- The Draft EIR’s analysis shows that after implementation of the identified mitigation measures, all intersections on U.S. 101 in the project area would operate acceptably (i.e., without adverse congestion). All other intersections in the study area would similarly operate acceptably, except the intersection of Koster Street and Wabash Avenue.
- 149-5 The comment asks why Home Depot would not close its store in Eureka, considering recent economic conditions, leaving “blight” in its wake. Please see Master Response 1, specifically “New Recessionary Conditions.”

Comment Letter 150

Comment Letter 150

23 January 2009

RECEIVED

JAN 26 2009

DEPARTMENT OF
COMMUNITY DEVELOPMENT

City of Eureka
Community Development Department
Sidnie L. Olson, AICP
Principal Planner
531 K Street
Eureka, CA 95501-1146

Regarding: Marina Center Mixed Use Development Project
Draft Environmental Impact Report (EIR)

Dear Ms. Olson:

Thank you for the opportunity to review the subject project. I would like to offer comments on three components of the report: Cultural Resources, Urban Decay (Social and Economic Impacts) and Mixed Use.

Cultural Resources - As a cultural resources professional, I found the cultural resources investigation to be thorough and complete. However, it is clear from the report that there is a strong likelihood that the project may have adverse impacts to two prehistoric archaeological resources, CA-HUM-69, an important Wiyot village site, and to 'Moprakw', a second Wiyot site. The mitigation offered in the report is archaeological training of on-site construction workers, and Native American observers for project coring activities. These are NOT adequate measures for the mitigation of adverse impacts to possibly National Register of Historic Places eligible cultural resources. In addition, if these cultural resources were encountered during the course of construction, it would result in costly delays to the project. Therefore, as mitigation of possible adverse impacts to cultural resources, I recommend a program of subsurface testing for the presence of archaeological resources BEFORE the onset of soil disturbing construction activities. Depending on the results of the subsurface testing, additional mitigation of adverse impacts, including archaeological excavations, may be required

150-1

Urban Decay - According to the EIR, under the California Environmental Quality Act, the social and economic impacts of a project do not need to be evaluated, only the impacts on Urban Decay. And, the EIR states that the project will not result in adverse impacts of Urban Decay. I think that it is very likely that the preferred alternative of the project will have major economic impacts that should be evaluated under CEQA. When an agency implements CEQA, it has a lot of discretion in that implementation. In addition, it is not only the letter of the law which must be implemented, but also the spirit. Therefore, if a major impact is likely, that impact should be evaluated. It is reasonable to expect that the project will have adverse economic impacts to the existing retail establishments in downtown Eureka, in Old Town Eureka, in the community of Eureka and in the Bayshore Mall. In fact, downtown Eureka has only recently recovered

150-2

from the adverse economic impacts of the Bayshore Mall; a second setback would be severe.

150-2
cont.

Mixed Use - The project preferred alternative favors retail and office over housing. In part this is based on data collected before the recent major downturn in the country, state and local economies. Based on the current economic situation it appears that there no longer is a need for additional retail space in Eureka. In contrast, especially according to the primary project developer, there is a need for additional housing in the county. A project which entails primarily housing, with minimal retail space, would be appropriate. It also would be much more appropriate for the Marina Village coastal location.

150-3

I look forward to your response.

Sincerely,

Ann King Smith
387 Ole Hanson Road
Eureka, CA 95503

5-776

Letter 150: Anna King Smith

150-1 Comments that the cultural resources investigation is thorough and complete are noted. Revisions to Mitigation Measure E-2 includes a subsurface investigation that would help identify the presence of cultural materials in areas predetermined to be culturally sensitive, and ensures protection of resources if found. This investigation would commence when engineering plans and soil remediation plans are finalized, and prior to project construction. Please see Master Response 9.

150-2 The comment expresses concern that the proposed project would cause local businesses to close. The comment is noted.

Please see Master Response 1, under “The Effect of the Bayshore Mall on Local Businesses” and “Potential Local Store Closures.”

150-3 The comment suggesting that more housing be included in the proposed project is noted. Twenty-four separate alternatives are screened for analysis, as detailed in Chapter VI of the Draft EIR. Regarding the demand for retail space, please see Master Response 1.