General Plan Update Discussion Guide

Compilation and Bike Rack

(current through 05/23/2023)

Contents

Commissioner Compilation for May 23, 2023

Design Element

Consent Items

1. **D-1g: Provide for bicycles, pedestrians, and transit in design.** Suggest changing one word as follows: **"Design shall ~~incorporate~~ encourage provisions for bicycle and pedestrian circulation,…."**
2. **D-2b: Streetscape design.** Suggest changing this to read: **Future changes to public street rights-of-way in the downtown shall include amenities such as street furniture, access and safety for pedestrians and bicycles, ~~while maintaining vehicle access~~ including the possibility of "car free" streets.** And add a #10 to the list: **Consider the possibility of "car free" streets.**
3. **D-2h: Site design, including parking areas.** Suggest the third sentence be modified as follows: **Parking areas shall be the minimum necessary and be separated from the street and sidewalk by a landscape buffer.**
4. **D-6a, #8:** This begins with, **"Parking areas are encouraged to be provided…."**. We should not be encouraging parking. Suggest the following, **"If parking is necessary, the minimal necessary parking should be located…."**
5. **5.1 INTRODUCTION:** Reverse the order of the first 2 paragraphs. It's Arcata's plan; state requirements come second.
6. **Guiding Principles and Goals - I:** Incorporate "green building" and "universal design" concepts and features into new and renovated structures.
   a. Since this is for new and renovated structures, Arcata should aspire to advance accessibility as well as sustainability over the next 2 decades to 2045, not play catch-up to current minimum practices.
7. **POLICY D-1 OVERALL COMMUNITY DESIGN** 3. ~~This shall be accomplished by~~ Providing articulation in building mass, surfaces, rooflines, wall planes, and facades, and including distinctive architectural features and ornamentation.
   a. Architectural distinction comes from many types of features beyond "ornamentation."
8. D-3g **Wooded hillsides.** Views of wooded hillsides forming the City's eastern edge from vantage points along public streets west of the State Route 101 should not be blocked by development to the extent practicable, balancing development rights in these areas. Any impairment or partial obstruction of these ocean views from new development shall be the minimum necessary for allowable development. The City shall encourage Cal Poly Humboldt to avoid blocking views in its new development.
9. D-3j **Streamside riparian areas.** Creeks or drainage channels and any associated riparian vegetation shall be retained in a natural state and incorporated into site design as a visual asset to development ~~which~~ that adjoin them. Design codes should encourage "daylighting" streams on City and private property, and restoration of riparian ecology and function.
10. D-4a **Design of roadways, ~~and~~ subdivision and redeveloped site improvements.** New subdivisions and infill or redeveloped site design shall provide orderly arrangement of …..
    1. Proposed street alignments including sidewalks and bikeways shall conform to the relevant Transportation and Road Safety Plans, wherever possible. Unless it is demonstrated to be infeasible, all new lots shall have frontage on a public street or improved alley, or publicly accessible courtyard or open space.

3~~9~~. Appropriate landscaping and illumination shall be applied to enhance safety and provide attractive screening and distinctions between spaces; illumination of streets shall be unobtrusive and the lowest intensity compatible with safety, complying with night sky standards wherever possible.

a. Where more lighting for safety appears to conflict with less lighting for night skies, design standards should provide clear standards and rationales for priority of lighting choices

11. D-4b **Lot patterns.** Lot boundaries should be regular in shape and lots should either have direct access to a public street or to an access easement which connects to a public street. Clustering of lots with common open space areas and/or common parking lots is encouraged. Condominium or other common multiple-unit tenancy designs may be approved with alternative vehicular access requirements, within fire safety considerations.
    a. Designing livable developments not dominated by roadways and parking, and with safe interior spaces free from motor vehicles is a crucial aspect of creating pleasant living spaces, especially for children and people with mobility or sensory impairments.
12. D-6b **Design of Mixed Use Development…**Require main building entries to be visually prominent and oriented to a public street or pathway, or publicly accessible courtyard.
13. D-7d **Site design criteria.** Landscaping shall be an integral part of site development, connecting site design elements, enhancing the site identity, and creating a pleasing appearance. Landscape designs ~~shall conform to the following criteria:~~ should incorporate existing natural vegetation where appropriate; provide for erosion control, help to manage stormwater onsite for absorption and percolation, and for privacy, and beauty.
14. I propose the following change to policy D-1e
    a. D-1e **Promote energy efficiency and solar access.** Site and building design shall emphasize energy efficiency, solar orientation and consider ~~minimize~~ shading of adjacent structures~~ to the extent feasible,~~ balancing development needs with solar access.
        i. The current language values existing structures' shading concerns over the potential for new, energy efficient development. Should we minimize shading caused by a new, energy efficient building, presumably by reducing the number of units, in order to protect the solar access of an existing structure?
15. I propose the following change to policy D-2b
    a. Provide or improve bike lanes, with an emphasis on protected bike lanes, where appropriate.
        i. We've discussed the safety benefits of protected bike lanes before.
16. I propose the following change to D-3h
    a. D-3h **Farmlands and open countryside.** Views of farmlands and open countryside — in the Arcata Bottom, along the State Route 101 south of Samoa Boulevard, north of Giuntoli Lane, and along State Route 255 west of the City, should be protected to the extent practicable, balancing development rights in these areas. Any impairment or partial obstruction of these views from new development shall be the minimum necessary for allowable development.. ~~New development should be sited and designed to minimize any impairment of such views .~~
        i. *All of the other view policies have similar balancing language*
17. I propose the following change to D-6a
        a. The siting and design of buildings shall promote energy-efficiency and consider solar access, balancing development needs with solar access. ~~and shall minimize impacts on other nearby uses.~~
            i. Same change as D-1e. Don't discourage new energy efficient structures because they will shade existing structures.
18. I propose the following change to policy D-2b

a. D-2b **Streetscape design.** Future changes to public street rights-of-way in the downtown shall include amenities such as street furniture, access and safety for pedestrians and bicycles, ~~while maintaining vehicle access.~~

i. We may some day in the future want to have a plaza/downtown with reduced vehicle access. This deletion makes that possible.

Policy Pitch Items

1. **Policy D-2b** I propose changing Policy D-2b to maintain sub-policy 10, regarding undergrounding of utilities, instead of eliminating that policy, as the draft does. I would either keep the former language of **"Require undergrounding of utilities and elimination of poles and overhead wires,"** or change that language to **"Encourage undergrounding of utilities and elimination of poles and overhead wires."**
   a. My rationale: Undergrounding of utilities provides for a more aesthetic (and perhaps safer) streetscape. I recognize that undergrounding costs substantially more that overhead utilities, so would be OK with changing the wording to "encourage" rather than "require." **[Note: this is discussed in a proposal below as well]**

2. **Policy D-2e** I propose changing Policy D-2e to maintain the deleted first sentence, but change the wording slightly, so the first sentence would read: "The height, scale and mass (volume) of new buildings and additions to existing buildings shall **~~be compatible with~~** **take into account** other buildings in the immediate vicinity."
   a. My rationale: I assume the former language was stricken because the word "compatible" is subjective and could lead to varying interpretations of what and what is not permissible. However, to "take into account" a new structure's impact on its neighbors only means that the impact of such features as height, scale and mass be recognized. This does not require project-by-project review of height, scale and mass, as I believe the existing zoning code does, and any potential new form-based code for this district would consider the impacts of new structures on existing ones, through regulation of such things as setbacks, height restrictions, rear yard requirements, etc.

      As a point of comparison, Policy D-5a lays out quite specific design criteria for multi-family residences.

      [Staff: this policy has led to disagreements about buildings that meet the code standards for height and setbacks & etc, but are larger than buildings around them. Development should be consistent with objective standards. If we wish to transition between smaller buildings and larger buildings, a standard could be established that no building could be more than say two stories larger than some percentage of the buildings immediately adjacent to them. This of course would significantly impact the development potential of our vacant sites, but it would be an objective standard. Any subjective standard will inevitably lead to disagreements about how to interpret when a four story building is proposed next to a one story building.]
3. **Policy D-1b** I propose changing the following highlighted language:
   a. **Emphasize Arcata Plaza area as ~~the central~~ ~~the main~~ the main community focal point ~~(Not applicable in Coastal Zone).~~** ~~Buildings~~ ~~fronting on streets around~~ ~~facing the Arcata Plaza shall be multi-story.~~ Architectural and other design elements shall emphasize the importance of the Arcata Plaza as the City's center ~~as~~ ~~the community's~~ ~~main focal point~~ for commerce,

entertainment, and special events. Designs shall promote pedestrian access and ~~continuity of~~ retail space at the ~~street level~~ back of sidewalk. Parking should be accommodated off-site to the extent practicable.

b. We should talk about this! The Plaza SHOULD remain Arcata's central community focal point! This is one of Arcata's most distinctive features, and our plan should endorse that. Also, calling for all and only multi-story buildings fronting on the Plaza may contradict some aspects of the Plaza historic district, even if the number of stories isn't one of the Plaza's listed features.

4. **D-5b Single-family residential design** Add statements concerning accessory dwellings, but especially this one, after the statement re hillside areas: In light of policies that encourage addition of accessory dwelling units on "single family" zoned lots, ensure that accessory dwelling unit design complements surrounding development, and retains privacy, access to direct sunlight, and a sense of appropriate scale. **[Staff: the term "ensure" should not be used in this context. Instead, "strive for" or something less rigid could be used.]**

5. **Policy D-2b** I propose the following changes in red text to this policy:

D-2b **Streetscape design.** Future changes to public street rights-of-way in the downtown shall ~~focus on improving~~ include amenities such as non-obstructive street furniture, access and safety for pedestrians~~,~~ and bicycles, ~~and reasonable and safe~~while maintaining vehicle access. The following design features should be considered in future improvement projects:

1. Increase the width of sidewalks.
2. Demarcate pedestrian crosswalks with pavement marking or special paving materials or colors.
3. Provide or improve bike lanes, where appropriate.
4. Incorporate street trees in appropriate locations.
5. Use special paving materials or patterns for sidewalks at key locations or intersections.
6. Provide landscape screening between parking lots and the street, with preference for parking associated with new buildings behind, or away from street frontage.
7. Provide shielded and directional street and parking lot lighting ~~that is~~ adequate for safety but that is not overly bright.
8. ~~Establish a uniform lighting fixture and post (or pole) design for streetlights;~~
9. ~~Establish a uniform design for various items of "street furniture," such as benches, trash receptacles, water fountains, etc.~~
10. ~~—~~Strongly encourage undergrounding of utilities to eliminate poles and overhead wires. ~~undergrounding of utilities and elimination of poles and overhead wires.~~

a. We should reconsider several design features in Policy D-2b Streetscape design, as shown on the next page. Street furniture can enliven a streetscape, but it's crucial that over-furnishing doesn't negate the value of widened sidewalks by blocking easy passage of more than one person walking abreast, wheelchairs, etc. We can be explicit here about preferential location for parking behind or away from street frontage (6). Reconsider uniform lighting design or street furniture for downtown. Varied functions and locations call for different lighting designs, not uniform ones, and street furniture should accommodate its locations' unique characteristics. Uniform requirements will also lock the City into purchases from a limited number of vendors,

and potentially "freeze" designs after they are no longer the most appropriate choices. Finally with 2045 in mind, we SHOULD strongly encourage utility "undergrounding," and sooner rather than later!

6. **Policy D-2e Design criteria for new structures and additions:** ~~Each building shall have an entry from the sidewalk to the street-level floor. Building elevations shall be articulated: long, continuous, unbroken wall and roof planes should be avoided.~~ The visual organization and proportions of building elevations — including the size, spacing and shape of window and door openings — should be harmonious ~~consistent~~ with neighboring buildings. Architectural detailing and ornamentation, such as cornices, eaves, recessed or covered entryways, and awnings, are encouraged. Design review applications shall include depiction of buildings on adjoining lots, ~~either~~ in elevation drawings and ~~or~~ photographs.
   a. Requiring consistency can stifle desirable innovations. For projects that require design review, whether we call for consistency or harmony, understanding the CONTEXT of the proposals requires both elevation drawings or simulations AND photographs of neighboring structures and sites. Digital documents make that more straightforward than old and expensive paper blueprints or color prints.
7. **Policy D-3f** I propose the yellow highlighted changes to policy D-3f: **Bay and ocean views.** Views of Arcata Bay and the Pacific Ocean from vantage points along public streets ~~in hillside areas~~ of Arcata shall ~~not be blocked by development~~ be preserved to the extent practicable, ~~balancing development rights in these areas~~. Zoning and land use policy decisions, which expand or limit property rights, shall analyze the potential for newly allowable development to obstruct views of the Bay or ocean. Any impairment or partial obstruction of these ocean views from new development shall be the minimum necessary ~~to~~ for allowable ~~reasonable~~ development.
   a. Since changes to our zoning actually expand or limit those property rights, this is a pretty meaningless statement. Protecting views must be taken into account in making zoning and land use policies in the first place! CEQA caselaw has recently limited the usefulness of CEQA in protecting viewsheds; Arcata must make our own policies beyond using CEQA as a case-by-case crutch.

Discussion Items

1. **D-1b: Emphasize Arcata Plaza area as a community focal point. "Buildings facing the Arcata Plaza shall be multi-story."** Are we suggesting this as a future policy? Do we want to? Some of the buildings on the plaza are not now multi-story. **[Note this is addressed above with a specific proposal for revision]**
2. D-1e **Promote energy efficiency and solar access.** Site and building design shall emphasize energy efficiency, ~~and~~ solar orientation and minimize shading of adjacent structures to the extent feasible, balancing development needs with solar access.
   a. We should consider direct sunlight in terms beyond just energy efficiency, especially as direct sunlight is the basis of many buildings' and yards' existing design and use. The City's design policies should NOT support new buildings' suddenly cutting off direct sunlight to neighbors!

3. **D-3j: Streamside riparian areas.** Policy comment: It should not be possible to just dig a ditch and then have it become a riparian area that must "be retained in a natural state." It would be easy to impede development if this were true.
4. D-7e: **Upgrade of non-conforming landscape.** This states, **"When improvements are made to structures on sites where landscaping is non-conforming, landscaping should be required to be upgraded if feasible."** Policy comment: Requiring the "non-conforming" (Who decides what is non-conforming?) landscaping be upgraded is a barrier to making improvements to structures. Do we want to impose that requirement?
5. **D-1h City edges -** Restricting development in surrounding open space lands to very low height, bulk, and density (minimum parcel size from twenty to sixty acres; ?? maximum structure height, and 50 feet maximum structure length or width visible from Arcata)
   a. As with Agricultural zoning, we should discuss and consider what IS (and what shouldn't be) allowed in agricultural and resource zones, and since much of that bordering area is beyond Arcata's city limits, where zoning is actually controlled by the county, or DESIGN policies should address structures, lighting, etc, regardless of parcel size. To what extent does prohibiting massive buildings or many buildings require such large parcel sizes, when "agricultural processing" or massive greenhouses may still build out Arcata's "greenbelt"?
6. A question or two: why is former Policy D-2i (Design of signs) deleted? Don't we want the General Plan to contain some policy guidance on signs? **[Staff: These are too detailed for a general plan policy. This detail is already included in the zoning ordinance.]**
7. Another question: In Policy D-4c (Grading and hillside subdivisions), why are criteria 1 – 7 deleted? **[Staff: These are too detailed for a general plan policy. This detail is already included in the zoning ordinance.]**
8. Question: In Policy D-5b (single-family residential design on existing lots in hillside areas), why are criteria 1 – 6 deleted? **[Staff: These are too detailed for a general plan policy. This detail is already included in the zoning ordinance.]**

Editorial Comments

1. **D-1h, #3:** Editorial change: 101 is a U.S. highway, not a state highway.
2. **D-3c:** Editorial change: 101 is a U.S. highway, not a state highway. This change should be made throughout the document.

Health Element

Consent Items

1. Introduction, Bottom of Page 2-1: There are four hospitals in Humboldt County, not two. The statement should include Redwood Memorial Hospital in Fortuna and Jerold Phelps Community Hospital in Garberville, as well as St. Joseph Hospital in Eureka.
2. Guiding Principle and Goals – amend A and E as follows:
   a. A. Ensure all residents can enjoy physical, social, and mental health and wellbeing, regardless of their race, age, gender, sexual orientation, social position, economic position, culture, background, or any other factor of identity. …
      E. Support healthy eating and active living programs and facilities to enable them.
3. H-1a **Determinants of health.** Work with the community and stakeholders in medical, mental, and dental healthcare fields to identify determinants in the Arcata community that impact health

and wellbeing, paying specific attention to factors affecting specific groups or demographics disproportionately. Facilitate access to financial and professional resources to document and utilize necessary epidemiological and health care data.

4. Add a new policy H-1e
   a. H-1e Retain existing healthcare institutions and resources located in Arcata. City policies should strongly support retention of existing healthcare institutions, facilities, and services located in Arcata, including Mad River Hospital, Open Door Clinic, United Indian Healthcare, and other more specialized medical practices.
      i. As small community hospitals and non-profit healthcare clinics close or limit services under financial and regulatory pressure, Arcatans' access to healthcare institutions in our city may be threatened. While the City and residents of Arcata have no control and very little influence over institutions so fundamental for our health and well-being, the City can ensure that it devotes sufficient effort and resources to take full advantage of state, federal, and privately offered opportunities to keep local healthcare providers here in Arcata, and even attract innovative new ones.
5. Add new policy H-1f
   a. H-1f **Land use regulation to support health care**. Amend land use regulations to support provision and accessibility of healthcare services, including locations of healthcare providers in multiple-use and commercial land use classifications.
      i. Land use regulations can ensure that bona fide medical services can be located in commercial or mixed-use zones. Transportation, parking, noise, and other considerations should be considered in project approval, with special conditions appropriate to the specific medical service. (This may include targeted bus stop locations, parking conditions, etc.)
6. **H-2b Opportunities for healthy eating.** Support City and community programs that promote nutritional health, to improve opportunities for ~~Ensure~~ residents of all races, neighborhoods, ages, genders, incomes, and abilities ~~have opportunities~~ for food security and healthy eating.
7. **H-3a 1.** Integrating physical activity into students' daily educational experience through both programming and the design of school sites and structures, and linkages with City facilities.
8. **H-3b Healthy workplaces.** The City shall seek and support resources to increase opportunities for healthy behaviors on workplace sites.
9. H-4b **Transparent and responsive government.** Increase government transparency and build trust among Arcatans of all ages, races, identities, and income levels. Demonstrate the City's credibility, reliability, openness, and community orientation through establishing a coordinated set of proactive channels for community-wide engagement between City departments, stakeholders, and the public. Respond promptly, reliably, and openly to criticism of City operation and administration from members of the public. Continue this engagement on an ongoing basis regardless of specific plans or projects underway. Evaluate implementation of plans, projects, and programs to ensure that established policies are being carried out. Monitor how implementation is serving different groups within the community, and respond to community critiques. ~~In comparison to each other.~~
10. Add new policy: **H-4h Senior engagement.** Support capacity and initiatives by Arcata's senior citizens and residents to advocate for changes in Arcata's infrastructure, programs, and city operations to help Seniors remain healthy and active.
11. Add new policy: **H-4i Engage with Arcatans of multiple abilities.** Support capacity among Arcatans of differing abilities and disabilities to represent their interests and concerns to the City with regard to City infrastructure, programs, and operations that can improve possibilities for people of different abilities to pursue healthy, active, mobile lives in Arcata.
12. Amend the implementation measures as follows:

a. **H-1 Access to services** 4. The City shall work with existing healthcare institutions and medical practices in Arcata to retain services and improve access to them.
b. **Health equity** Routinely engage people knowledgeable about needs of people of varied abilities to ensure that City facilities, programs, and practices serve people of varied abilities and disabilities. Strive for Universal Design in all City facilities.
c. **H-2 Opportunities for healthy eating 4.** Work with existing commercial businesses to improve access to healthy food.
i. *[Let's not underestimate the willingness of businesses to see providing healthier food options as a smart business opportunity! The creativity of Arcata's business community is an asset, and even chain grocery stores and restaurants respond to local governments' as well as consumers' urging and market demand.]*
d. **H-6 Community Engagement Protocol -** Respond promptly and openly to critiques of City operations and decisions, including those made through administrative channels, and especially to those engaging with City committees, the Planning Commission, and City Council.

13. **C-X Safe, convenient, connected, and multi-modal transportation** 2. Ensure public health and equity considerations are included as part of transportation network improvement decisions**,** including accessibility and mobility considerations for people of diverse abilities and disabilities.
14. **C-X Targeted improvements to existing transportation network**
2. When designing new or improving existing streets, implement complete streets policy to incorporate pedestrian and bicycle safety improvements. Ensure that facilities and design promote and support mobility by people whose mobility is impaired, who move slowly, or who need mobility assistance. Use cost-effective street improvements …

4. Consider developing City-operated traffic lights with appropriate signals for people with impaired vision, hearing, or mobility.

Policy Pitch Items

1. **Transportation, Page 2-17:** Suggest changing the last sentence to read, "Recognize that active transportation ~~is inaccessible~~ can be difficult for many Arcata residents, specifically persons with disabilities, families with children, and lower-income Arcatans." **[Staff: suggest the language should stay as it is. There are times of day and locations when/where bus service is inaccessible. This language points to the systemic cause. The phrase "can be difficult" is ambiguous as to cause. The former gives clear responsibility and line of action to fix the systemic problem.]**
2. I propose we add the following sentence to policy H-2e
H-2e **Alcohol misuse.** Reduce the misuse of alcohol and the prevalence of alcohol-related accidents and injuries, paying specific attention to groups that may be at higher risk for alcohol misuse. Alcohol misuse is linked to injuries, violence, unsafe sexual behavior, adverse birth outcomes, blood pressure, heart disease, stroke, liver disease, cancer, and decreased emotional wellbeing. The City shall consider the impact of land use policies and programs on alcohol misuse. The City shall promote increased public transit access, availability, and frequency near bars and other establishments that serve alcohol.
    i. *Lack of access to alternative transportation is a cause of drunk driving. The City can work with A&MRTS and HTA to increase public transit availability near bars and other businesses that supply alcohol at appropriate times.*

3. Amend Implementation Measure H-7
    a. **H-7 Health data** As part of the City's Annual General Plan Progress Report submitted to the State Office of Planning and Research, include applicable information from departments, residents, and other stakeholders about how improvements to support health, or recent developments that threaten it, have affected residents. Give specific attention to discrepancies faced by ~~specific~~ neighborhoods and groups. **[Staff: The purpose of this measure is to concentrate attention on underserved neighborhoods that have disparate investment due to higher concentrations of lower socioeconomic households and people of color. Broadening the scope to all neighborhoods detracts from the emphasis on racial equity. Staff recommends not striking specific. Also, it is unclear what "developments" means in this context.]**

Editorial Comments

1. Introduction, Page 2-3, second paragraph under "Assets to health and wellbeing in Arcata" – change "stoke" to "stroke"
2. Policy H-4a, Page 2-8 – Capitalize "Equity Arcata"
3. The policy statement should come FIRST, not last in a policy paragraph.

H-2 d **Commercial tobacco.** The City shall prioritize the need of non-smokers to breath smoke-free air in public places. Policies should discourage ~~Reduce the~~ use of commercial tobacco. Commercial tobacco use is linked to asthma, cancer, COPD, diabetes, tooth loss, heart disease, stroke, and birth outcomes. ~~The City shall prioritize the need of non-smokers to breath smoke-free air in public places.~~

Bike Rack

The following document the Bike Rack items that the Commission will resolve as time allows consistent with the Meeting Framework adopted March 14, and amended thereafter. Items shown in grey were discussed at a prior hearing but no decision was made. Items without highlighting have not been discussed.

Vision Statement

No policies in bike rack

Land Use Element

Ideas for Discussion

1) **LU-1k: Support and revitalize other existing neighborhood and commercial activity areas**. Although not a "neighborhood" center, it would also help to have some explicit mention of Uniontown, especially in light of AB 2011. Uniontown might be a prime target for mixed use redevelopment (and a reasonable one), if not under its current owners, then under some future ownership by 2045.
2) **LU-2: Residential Land use** That's real estate-talk. Change that to "residents." The policy refers to "in higher density developments". Clarify: Does that refer to RM and RH only? What about in those mixed use developments we're expecting, and in :PD Planned Developments?

3) **LU-2c: Planned Development – residential: Add:** Planned Development may also incorporate non-residential uses *where they will not* reduce *safety or livability for residents, and must include*

adequate walkways, and set conditions for commercial operations. (Avoid a scenario where commercial use is added to a residential :PD and brings dangerous vehicle traffic or constant loud noise into a previously kid-friendly, quiet area.)

a) The Implementation Measures list calls for the City to review sites in the :PD combining zone, and possibly releasing some of them from :PD requirements. However, new state housing laws already limit City discretion for projects that include affordable housing, and exempt some of those projects from CEQA review. The City should generally retain the discretionary review that the :PD combining zone provides, especially for already developed sites, to ensure that intensified development there does not threaten safety or existing environmental assets and recreational spaces.

4) **LU-3a Commercial use classifications** "Large scale retail uses shall require a use permit due to evaluate…" *Can we add a threshold size or scale?*
   a) "Potential impact on existing and projected traffic conditions" – *Add: pedestrian and residents' safety*
   b) **Table LU34 COMMERCIAL LAND USE CLASSIFICATIONS:** (Questions mainly)
   c) What is the rationale for adding Travel trailer [RV] parks to principally permitted uses in the C-G zone?
   d) Will eliminating animal sales and services make existing pet stores and veterinary services in C-G non-conforming? Or are these rolled into some larger category?
   e) Add to the "Gas sales" category electric vehicle charging stations? What about zip car rentals, etc?
   f) Restaurants, Bars, Taverns and pubs, nighclubs: Will bars still require a Use Permit? If we're now allowing on-site cannabis consumption, should these be added to the list?
   g) Commercial Recreation / Entertainment: How come "outdoor recreation uses and services" are NOT allowed in either the C-C or C-M zones? Should they be?
   h) Educational, Cultural & Religious Uses: Since no "Religious Uses" are actually listed, and since the City has limited authority to regulate them anyway, should we take "Religious Uses" off the category title? (AND … Does the City have discussion / condition procedures set up for when an Arcata church decides XYZ is actually a religious use, and demands services to support it?)
   i) Urban Agriculture: Not allowed in the C-C zone. So, NO herb or vegetable gardens on a temporarily vacant lot downtown? What about as an accessory use? (No commercial herb gardens in backyards and roofs? Or is that allowed under some other rule?)
   j) Commercial – General This is mainly Valley West. With a max residential density up to 50 "units" per acre in addition to commercial uses on the same site (???), with density bonuses likely to allow up to 90 dwellings per acre, what do we envision in Valley West for this allowable density, especially in light of AB 2011?

5) **LU-3e Commercial – Central** : Residential use is allowed as the primary use on vacant sites. Presumably, NO maximum density & no parking? Given current vacancy rates, may existing commercial buildings be converted to residential use anywhere in C-C? [Staff Response - I think that is the next step. This could be an implementation measure]

6) **LU-4b Little Lake** : The City has sat on cleaning up its Little Lake site for 20 years. There's some new activity there now. (I'd heard "staging and material storage" for the WWTP upgrades?) The draft policy is: "… The site shall be planned as a mixed-use development including passive recreational uses and a dog park. Development shall be consistent with the adopted Long Range Property Management Plan." That plan indicates the site should be used for "economic development," which

presumably means jobs. But the property management plan doesn't go further than this. *I hope* our Sea Level Rise discussions on Tuesday will help us envision what types of structures could be safely allowed on that site – IF ANY – and strongly recommend against allowing permanent structures, or ANY "mixed use" that includes housing.

i) Throughout the Plan, let's replace the term "passive recreational uses" with something that actually relates to land use / infrastructure, like "recreation facilities for walking, running, sitting, nature observation, and social interaction." It's more words, but better connotation in our sports-dominated society. [Staff response – no mixed use or residential use is planned on this site]

7) **Table LU-6: AGRICULTURE AND NATURAL RESOURCE LAND USE CLASSIFICATIONS**
   a) Coastal-dependent recreation in the A-E zone: What would this be? Duck hunting blinds? Kayak docks & rentals?
   b) Keeping confined animals isn't allowed in the A-R zone. No backyard hen coop? No backyard goat pen? It's odd that hens are allowed in residential zones but not in an ag zone. It might help to re-state the list of allowable uses to reflect scale of confined animal keeping (I think the LUC does this.)
   c) "Silvicultural operations" and "Aquacultural operations" are not allowed in either agricultural zone. It might make sense to allow tree nurseries and fish ponds, for example, with a Use Permit to protect groundwater and prevent noxious odors.
   d) Farm worker housing policy is clear for diked/ reclaimed former tidelands (**LU-6d2**) but not for other ag lands. Farm worker housing should count as "residential units" and "dwelling units" with standards identical to other housing or ADUs.

8) **2.3 IMPLEMENTATION MEASURES TABLE** – This is a bare-bones list, focusing on the near-term, with little except the "ongoing" items and Economic Development Strategic Plan 5-year updates that carries us beyond the first couple of years. It would be great to develop a much more substantial list of implementation actions to achieve the goals of the many policies in the Land Use element.
   a) It would help to include specific implementation measures for Policy LU-1b "Promotion of infill development and designated Infill Opportunity Zones," if only to identify a time frame for action.
   b) LU-4 Pedestrian-friendly activity centers: These measures are more policies themselves, than specific implementation actions, and will be only parts of the types of form-based standards that would be needed to implement them. Once we have experience with a form based code in the Gateway, would it make sense to include an implementation measure to consider developing appropriate standards for the other activity centers?
   c) LU-5 Business park plans: The city should seriously revisit the "business park" master plan idea for Little Lake, even though the City is committed to putting those 12 acres to some economic use. Developing a site plan for Little Lake: Yes. But let's reconsider calling it a "business park."
   d) LU-6 Planned Development Overlay: An inventory of :PD sites will be useful. (See comments above.) But beware of using this review to eliminate City development guidance and discretion as a gift to developers.

9) LU-7 Commercial Visitor Serving Overlay – Is there a rationale for retaining the Visitor Serving zoning designation? It seems the proposed Land Use classification system has already assumed that the Commercial General classification is appropriate for Valley West, especially as so many of the motels there no longer serve "visitors."

10) **Land Use Designations** We did address the two rezoning proposals that appear to have received the most public attention to date. However, we have not addressed any of the other specific rezoning proposals at any point in our process, other than through the Gateway Area Plan discussions.

[staff] indicated that at the end of our May 9 meeting there will be an opportunity to address the rest of the rezoning proposals, so it would be important to indicate my concerns beforehand. So I'm writing them out briefly:

a) Exhibit 1: I-L to C-M south of Giuntoli to Boyd Rd:
b) Since C-M could include residential uses, and there remain several Industrial/ Industrial-Commercial types of uses. Because many of those parcels are quite large, would a Planned Development permit still be required? If affordable housing is included, would there then be no housing density maximum? How would allowable intensities be regulated in C-M in <u>this</u> area? (Or, would we need to wait for a draft amended LUC to figure that out?) What objective design code standards would / could apply for a C-M one in this location? (It would be in the Giuntoli / Valley West "infill opportunity zone"? Or outside of it? HOW would the C-M zone protect possible future <u>residents</u> from lingering contamination from former industrial uses? (E.g.: the easternmost parcels are now the school bus lot and shop; many anecdotes about former practices of history of oil, lubricant, & other chem dumping, etc on the site.) Are any of the current uses actually Industrial, rather than things that could transfer to Commercial in the transition time? (And would they then be non-conforming?)
c) Exhibit 2: I-G to I-L east of West End Road:
d) WHY rezone? This appears to be the land behind the wetland back of what's now the Cannabis Innovation Zone? Last we heard, was this the land proposed for the "eco-burial" site? The Property Report on the cit GIS already lists this as BOTH I-G <u>and</u> I-L. Since the site is already so heavily disturbed, with access ONLY through the adjacent Industrial land, is the purpose of eliminating possible heavier industry there as a buffer to the NR-TP land to the east?? Why not just leave zoning as it is? (Or, is it too ambiguous?)
e) Exhibit 3: R-VL to R-M lots west of Alliance & south of Spear:
f) I propose we <u>retain the current zoning in this area</u>, at least until developer(s) or owners actually request rezoning. The area is adjacent to A-E land (agriculture, even when used intensively by Sun Valley's bulb operation), and within the Coastal Zone. Up-zoning this area now will be, essentially, an invitation to land speculators.
g) Is the purpose of up-zoning to R-M be to encourage developers to combine parcels to build larger projects? Is the City's concern that the combination of subdivision and ADUs on existing small landlocked lots make for a continued fragmented residential development?
h) Realistically, developing any of those small parcels at R-M density would probably require assembling a multiple-parcel project site. That would then be big enough to require a PD anyway, which could effectively increase <u>actual</u> housing density, without also opening the area up to the density bonus requirements above and beyond the face value R-M maximum. The current R-L zoning already would allow ADUs, and SB9 subdivision, effectively increasing the amount of housing the area could provide.
i) Several parcels at the south end have broad water pipe easements. (Didn't we approve a PD there a few years ago? It appears that's never actually been built.)
j) Many of those interior parcels are "land locked" though they have shared driveways. The northern parcels were only recently rezoned from A-R to R-VL; at least, the City's 2008 zoning map (online) still shows them as A-R in the Coastal Zone. And the area just to the interior (west, and south of the parcels proposed for rezoning) is still A-E (coastal), part of Arcata's greenbelt. Rezoning this land to R-M now would effectively dump our longstanding policy of gradual

transition from lower density / lower height development to much higher density adjacent to A-E land in western Greenbelt.

k) Exhibit 6: C-G to C-M for all parcels facing G Street from 11th to 18th ("Northtown"):

l) This would encourage redevelopment with commercial uses on ground and apartments above, with NO maximum use intensity, and no parking requirements. If this rezoning occurs, we should have "objective standards" in place at the time of the rezone for such intensified development in this area. (A Northtown FBC would be at least as necessary here as one is necessary to the Gateway. That would get us things like appropriate utility connections, wider sidewalks, appropriate upper story design, and limited curb cuts onto our major N-S street. Would any SB 2011 provisions override our C-M?

m) Exhibit 7: R-H to C-C for two corner parcels on the east side of J Street, at 6th and 8th:

n) Seems to make sense, since this would bring those whole blocks into C-C. Housing would still be possible with C-C. What makes less sense is **why those blocks aren't included in the Gateway**.

o) Exhibit 8: R-M to R-H on parts of 4 blocks, 5th 6th Streets between F & I:

p) I'm also wondering why this area wasn't included in the Gateway. Presumably at R-H Question: **Will the alley between G & H, and 5th & 6th be retained as public right-of-way, even if a developer attempts to redevelop that whole block?**

q) Exhibit 9: Uniontown C-G to C-M; and enclave south of Uniontown R-M to R-H:

r) Is the reason for rezoning Uniontown to allow for redevelopment of the center with housing as well as stores? Rezoning the enclave south of Uniontown to R-H could allow density up to 90 dwellings per acre, with density bonuses; so over 1000 more people. Could work – if they don't all bring their cars … This rezoning would be an investment windfall for current owners there.

s) Exhibit 10: Several parcels at the south end have broad water pipe easements. (Didn't we approve a PD there a few years ago? It appears that's never actually been built.)

t) Exhibit 10: C-G to C-M for multiple parcels south of Samoa, between E & I Streets:

u) Retain the current zoning at least pending policies that will be in the Coastal Element / Local Coastal Program update. C-M zoning could allow new housing to be built in the mixed-use zone. While this is right on Samoa, it goes against the principle of NOT adding new housing south of Samoa, where SLR, liquefaction, etc could put new residents in harm's way (likely renters).

v) Exhibit 11: R-M to R-H for the Bayside Road townhouse and apartments:

w) Retain current R-M zoning. Have the owners of these two apartment properties actually asked for this rezoning? These are high quality, relatively new rental housing, at a scale appropriate for this part of the neighborhood. Additional density here (up to 90 units per acre, de facto) likely means knocking down existing high quality and reasonably affordable housing. Rezoning these areas now, before developing the multiple use potential of the Sunnybrae shopping center areas, is really just a gift directly to the landlord(s).

x) Exhibit 12: R-VL to R-L on Buttermilk frontage:

y) The owners will love it, especially with SB9 subdivision possibility. Have any of them asked for this rezoning?

z) Exhibit 13: PF to R-VL, pumping station (?) & land?:

aa) Recommend either keeping the PF designation for now, or changing zoning to **R-L** instead of R-VL on this ½ acre site. Potential access from Anderson Lane instead of Old Arcata Road? If the public facility is no longer needed (a pumping station?) does it make sense to replace it with another public facility? If it will be privately developed, doesn't it make sense to allow slightly higher density right on the road, at least R-L instead of R-VL, even thought the neighbors have R-VL?

bb) Exhibit 14: The Gateway Area

cc) Presumably will be subject to Gateway zoning – to be addressed with the GAP. Avoid designating any zone that straddles the Coastal Zone boundary (e.g., the Barrel District).

Circulation Element

No policies in bike rack

Public Facilities and Infrastructure Element

No policies in bike rack

Public Safety Element

Consent Added After the Scheduled Meeting Date

1. **The "Guiding Principles and Goals" section**, which now follows the background / overview material, should precede it, appearing immediately after the 2 introduction paragraphs, and before the first "Overview" section. (This should be where the "Guiding Principles and Goals" should appear in EACH element. This is not just an "editing" suggestion, since the Guiding Principles and Goals should actually guide the entire element, its policies, and implementation measures.
   - **Add** after "D": "Address increasing risks of flooding associated with sea level rise and rising groundwater levels in terms of both safety of people and property, and in terms of long term land use policy. (The Coastal Element also addresses these.)"
   - **Add** after "J": "Foster community safety by developing hazard mitigation, emergency response, and long-term resilience programs through open, participatory, and responsive planning and decision processes, and support for community safety communication, education and training, organization, and working groups."
   - **Add** after "J": "Cooperate and coordinate with regional bodies, neighboring communities, and major institutions, as well as state and federal agencies to address emergency response, hazard mitigation, post-disaster plans, and planning to increase Arcata's and our region's resilience."

1) **PS-1a City Emergency Response Plan**: ADD at the end: "The City will periodically revise Arcata's Emergency Response Plan with open communication and community participation in response to community concerns." (The Emergency Response Plan is the most opaque of the City's plans. Let's change that!) Also: Do we want to mention health emergencies, or is that a County responsibility?
2) **PS-1b Evacuation routes / transportation facilities :** ADD at the end – "The City shall coordinate with regional jurisdictions, transportation and health care providers, and Cal Poly Humboldt to develop plans for evacuation, transportation, or remaining in place during emergencies."
3) **PS-1d Siting and design of critical facilities:** *Should we consider electric power as "critical"?* ADD at the end: "The City should consider opportunities to relocate critical facilities to less dangerous locations, and do so where relocation is feasible."
4) **PS-1e Development & design standards for emergency response**: ADD at the end: "The City shall work with Fire and emergency response organizations to acquire and operate equipment that is sized appropriately for varied access and response contexts." (Remember, it may be the Fire District not the City of Arcata itself that makes those equipment choices and purchases.)
5) After or before **PS-1f Citizen training … ADD a Policy**: "The City shall assist neighborhood and community-based groups who request help aiming to support education, cooperation, and mutual aid before, during, and after emergencies, apart from and in addition to the CERT, or the County's Office of Emergency Services." (Such community-based efforts have been extremely effective, and may provide alternative support that boosts safety in situations where formal organizations don't work well, especially those linked with or dependent on police or fire district responses.)

6) **PS-1h Severe Weather Hazards: MOVE** this policy to just after **PS-1e Development & design standards**
7) **Table PS-1 GEOLOGIC HAZARD LAND USE MATRIX**: This Table requires explanation! Even if it refers to another document, something in the Plan should explain categories, standards, abbreviations, etc! The Draft eliminated even the little explanation in the deleted text box. The Table will mean little to the general public without further explanation.
8) **PS-2e Shoreline hazards (tsunami inundation, tidal flooding):** Are emergency shelter locations considered "critical"? Our current zoning allows emergency shelters on South G Street, within the shoreline hazard area. Should we designate alternative / additional locations? **ADD:** "The City shall seek locations for emergency shelters and services in locations outside the shoreline hazard area."
9) **PS-3c Hillside development standards:** #3. Vegetation removal: **Add to complete**: "Vegetation removal in the natural area of each lot shall be subject to review and approval by the City. The City may require hillside development approval to include a vegetation management program to reduce fire risks, including monitoring and enforcement provisions."
10) **PS-3g in "OTHER GEOLOGIC HAZARDS AND AIRSPACE PROTECTION"**: Airspace Protection should be a separate policy category, NOT lumped in with "other geologic hazards"! **ADD** a policy to **restrict Drone operation**, especially around the low-fly approaches to the airport, around power lines, and in wildlife areas (the Marsh, though I think there's already a drone prohibition there). This is probably beyond the General Plan's scope, but those mylar balloons should be prohibited too, since they can knock out power lines, clog waterways, and endanger wildlife. **[Staff: supports adding this. The mylar balloon piece may be interesting to weave in…]**
11) **ADD after PS-4h: Drainage Master Plan –** "The City shall update its Drainage Master Plan periodically, at least once every [10? 5?] years, or whenever significant new hydrologic data appear to make building or development based on the existing Plan's assumptions obsolete."
12) **POLICY PS-5 FIRE HAZARDS** Objective: "Minimize risk of personal injury and property damage resulting from structural (urban) and wildland fires. Manage City forests to sustain ecosystems and their services in ways that also reduce risks of injury to people and damage to property." (Refer also to the Forest Management Plan, which will be updated, and which should be consistent with and subsidiary to the General Plan.)

Policy Pitch Added After the Scheduled Meeting Date

1. **Fire Hazards Overview** (p. 6-4): The first paragraph of the overview addresses the USFS "broad brush" fire hazards classification. This is NOT one that is particularly meaningful in Arcata, since it fails to differentiate parts of the city. While a good warning, this broad brush use of federal and even state classifications in the first two paragraphs of the overview would scare any potential new resident, developer, or insurer clean out of town! Start with an Arcata-oriented description, referring to a more finely-differentiated fire hazard map, which should be developed separately from the city-wide multi-hazard map. This isn't just an editing matter; differentiating among risk levels at a finer grain than the 70% of the city in the Wildland Urban Interface is a significant policy matter with important implications for development location and intensity, and investment-motivating fire protection and prevention policies.
2. **Hazardous Materials Overview** (pp. 6-4 & 6-5): **Add** to p. 6-4 list: "4. Cleaning up, remediating, and restoring areas contaminated by toxic chemicals, in accord with state and federal programs and standards." Mention ongoing assessments and cleanup status of known contaminated sites. (Since those assessments and cleanups can take 20 years, Plan readers in 2030 might still be concerned

about the same places! The Little Lakes assessment has been going on since at least 2004!) This might also be the place to note that Arcata is a **Nuclear Free Zone**.

3. **Airspace Protection Overview** (p. 6-5): Address drone operation in Arcata airspace! Mention PG&E's frequent helicopter inspections of their transmission lines, which now include extremely low flights over residential areas. **[Staff: It isn't clear that this is policy]**
4. **Climate Change Adaptation and Resiliency Overview** (p. 6-5 & 6-6): This language is so general, most of it could be moved to the "Introduction" at the start of the Element! But it's a good statement, and its position here fulfills the state requirement.
5. **PS-5b Review of development for fire safety: ADD at end of policy:** "… and design features, building height and bulk. The City shall not permit construction of any building or development that the Arcata Fire Protection District's plan review indicates cannot be adequately protected from fire risk by the District, or through mutual aid agreements with other fire districts in the region." **[Staff: This is too broad.]**
6. **PS-6c Use of potentially harmful materials on public lands and rights-of-way: ADD** at the end: "The City shall also prevent utility companies from applying toxic substances along their transmission lines or other facilities within City limits." *(PG&E isn't a public agency, and a City prohibition might not stand up in court. But a very clear City policy in the General Plan will help make sure PG&E won't spray herbicides in Arcata, regardless what they do elsewhere.)* **[Staff: we would like to support this, but as written, it is unlikely enforceable}**
7. **PS-7a Development/building and site design standards for crime prevention: ADD** at the end: "Video surveillance that unduly invades privacy shall not be an acceptable part of any Arcata design standard or City practice." **[Staff: need to better define unduly invading privacy and confirm that there is no case law around this issue]**
8. **6.3 IMPLEMENTATION MEASURES** PS-3 Evacuation Planning: ADD: "Develop protocols for providing resources and assistance to community members within the City through a variety of means when remaining in place appears to be more prudent than evacuation, and in circumstances where the Emergency Operations Center cannot provide adequate help."
9. **6.3 IMPLEMENTATION MEASURES** PS-5 and PS-6 "Evaluate renewing a cooperative agreement with CALFIRE" and "Wildland Urban Interface Risk Reduction Program": *Add the Fire Management Committee to the list of responsible parties to consult in this evaluation.*

Other Matters

1. **POLICY PS 8 HUMAN HEALTH HAZARDS:** *Is this section cut because there will be a "Healthy Community" element?*
2. **PS-4c: Limitations on development within Flood Zone.** This section describes requirements for building within Flood Zone A. Why are we allowing any new building within Flood Zone A?

Editorial Comments

For anything you might abbreviate later, **write it out in full the first time you mention it in each Element**, and ideally make a list of ALL abbreviations to be included as a Plan Appendix. Examples in the Safety Element draft: CERT (mentioned on p. 6-2, but not written out in full until policy PS-1f on p. 6-8); HPM (mentioned at end of top paragraph on p. 6-2).

Avoid text boxes that don't reach the full page width – transferring them to some online media platforms doesn't work well. (A small box on a full-page PDF doesn't read well on a phone!)

The Redwood Coast Tsunami Work**ing** Group does a huge job. But although it's been around for several years now, as a pretty ad hoc group, its records and reports aren't easily available to the public (who will be reading this plan; see p. 6-2). The last sentence on p. 6-2 refers to a map of hazard areas in Figure PS-a, located in a map pocket at the end of this Element. NB: In a digital version of this plan, there's NO map pocket. So including a digital map at a reasonable, readable scale is important.

Flooding hazards overview (p. 6-3): Add a statement regarding flooding associated with sea level rise, and possible rises in groundwater in coastal areas. (Even if that's covered in the Coastal Element, the Safety element should address it too.

Arcata's Drainage Master Plan Goals: P. 6-3: Mention Plan date (or last update)

Prior Decisions

Vision

"**Arcata Today**" (edit) – "*Arcata today: Arcata is home, a work in progress, with its natural beauty and resourceful citizens, and exemplary quality of life.*"

Add a statement after "We live resourcefully" and before "We move forward," or somewhere before "We're drawn to the Plaza": "*We are resilient. We face hazards by adapting to a changing environment while limiting our harm to the ecosystem and its functions, and to global climate.*"

We share the benefits of California Polytechnic University Humboldt" – ADD to this statement: "*We work together to ensure that the University supports Arcata's vision for our future, just as the City is an ~~accommodating~~ welcoming host to the University.*"

Add a statement (perhaps at the end): "*We work with neighbors. We work with neighboring jurisdictions and regional partners to tackle problems we can only solve together, and we expect and encourage our neighbors to work with us to fulfill our community's vision.*"

I support the "Revised Vision Statement" (Appendix D). I don't support the "Reorganized Vision Statement" (Appendix D2). The former is well written (see comments below) and concise. The latter has some empty language and is not nearly as effective. **Change neighborhood language and accept.** from the 3/27/23 meeting

"We're drawn to the Plaza" – Cut the added statement at the end. It would be fine to ADD a statement supporting community public spaces throughout the City, but not tacked on to this statement that recognizes the Plaza as Arcata's unique center. This is from Appendix D2 from the 3/27/23 meeting

Under both **Equity** and **Connection and Community**: Religion is not called out as a characteristic. Do we want to call it out?

Change Health and Safety to include "well being"

Land Use

1. I propose adding the Sunset Neighborhood to the implementation measure I introduced at a previous land use element meeting and setting a timeline on that implementation measure of 2 years.
    a. The sunset neighborhood has many of the same qualities that make it suitable for allowing increased density and mixed uses as the Bayview, Arcata Heights, and Northtown neighborhoods. This is also a direct suggestion from members of the public. The planning commission should consider the merits of up-zoning and allowing mixed use in that neighborhood in the future as well.
    b. This implementation measure should be drafted as follows:

i. **City staff shall bring before the planning commission a proposed rezone to consider allowing mixed uses and more housing in current R-L neighborhoods within walking distance of the plaza and Cal Poly Humboldt**
    1. The Bayview, Northtown, Arcata Heights, and Sunset neighborhoods currently only permit low density housing despite being within walking distance of downtown and/or Cal Poly Humboldt. Staff shall develop a plan to upzone these neighborhoods in line with the Strategic Infill Redevelopment Program and bring the plan back to the planning commission for consideration within 2 years.
        a. Responsible Party: Community Development
        b. Time Frame: Year 2

2. I propose changing the definition of **Residential High Density [R-H]** as follows:
    a. **Residential High Density [R-H]** High density residential uses are designated in central Arcata and other areas to allow increases in higher density above present levels multi-family housing located in proximity to commercial and employment uses, public services, schools, and parks. Local-serving commercial uses such as corner grocery stores, coffee shops, etc. shall be permitted in [R-H] zones.
    b. We discussed this change at the last meeting regarding the land use element. Other Planning Commissioners and one member of the public agreed that allowing smaller, locally serving commercial uses in these zones created more walkable neighborhoods. It's nice to have a corner store that you can walk to rather than needing to use other modes of transportation to access another part of the city.

3. I propose an additional policy as follows:
    a. LU-1x **Reduce Parking Maximums in the most walkable areas of the city.** Reduce maximum allowable parking requirements within Infill Opportunity Zones to promote walkable communities.
    b. Reducing maximum parking allowed within the areas planned to be the most walkable within our city will ensure that these areas are not dominated by cars and parking lots, making the more inviting for non-vehicle forms of transportation.

4. I propose changing the pie chart on page 2-2 of the Draft Land Use Element (Packet pg. 15) to split the residential slice into R-VL, R-L, R-M, and R-H zoning. This will give the reader a more accurate representation of how we dedicate land within the city to the various kinds of housing.

5. I propose changing the policy **LU-1e** as follows:
    a. **LU-1e Development of a diversity of housing types.** The land use plan map shall provide sufficient quantities of land in the various residential use categories to allow for development of a variety of types of new housing units and residential environments. The purpose shall be to ~~maintain~~ achieve an appropriate balance between single-family housing on individual lots and multi-unit housing types.
    b. As currently written, this policy assumes that we currently have an appropriate balance between land zoned for single family housing and multi-family housing. This word change erases that assumption while leaving in the desire to achieve an appropriate balance.

6. I propose changing the definition of **Commercial – General [C-G]** as follows:
    a. **Commercial - General [C-G]** This designation provides the full range of retail, entertainment, and service commercial uses primarily in, Valley West, C-G development must provide convenient access for patrons arriving by bicycle, public transit, motor vehicle, or on foot. ~~Businesses in the C-G area will be expected to provide sufficient on-site parking.~~ C-G areas are intended to have convenient access from residential areas in order to provide for day-to-day shopping and service needs. Residential densities allow up to 50 units per acre.
    b. As currently written, this section equates automotive travel with convenience. It also dooms Valley West to continue its current car-oriented development. I recommend that we remove parking minimums in C-G and allow developers to determine the correct amount of parking they feel is necessary for their projects to be commercially viable. This will allow the community to hopefully develop as more walkable and less car dependent over time as nearby residential densities increase.

7. I recommend we change policy **LU-4h** as follows:
    a. **LU-4h ~~Petroleum extraction and processing~~ Energy development, production, and use.** The City of Arcata recognizes the national need for the responsible exploration, recovery, development, distribution, and processing of the country's energy resources. ~~However, t~~The City also recognizes the potential adverse impacts such activities may have. Petroleum extraction is of particular concern on the North Coast. On- or offshore petroleum extraction will result in negative impacts on the climate and our coastal scenic resources, as well as our sensitive land and marine environments. ~~petroleum extraction and processing can will have on the climate as well as sensitive land and marine resources and on the scenic quality of coastal resources.~~ Therefore, the City finds that, in order to minimize adverse impacts to such resources, on-and off-shore petroleum product exploration, recovery, and processing should be confined to those geographic areas which now accommodate these uses and activities. Consistent with this policy, the City shall prohibit on-shore petroleum exploration, production, and processing within its boundaries, and shall oppose the use of off-shore areas south and west of Arcata and in Humboldt County in general for such uses.
    b. I don't see any reason for Arcata to "recognize the national need for" oil and gas exploration and development. We're in a climate crisis after all.
8. Although the need for housing is discussed, the issue of homelessness is not mentioned directly. I feel strongly that we should do so. Safe and secure housing is a human right. We live in the most prosperous country in the world; we should not have people without homes. We can address that in the following sections.
    a. **Guiding Principle C:** ~~Allow~~ Encourage ~~for~~ a range of housing choices that includes affordable ~~dwellings~~ housing for all community residents, including currently unhoused people, that accommodates families as well as individuals and groups, and varies in size and type to reflect the diverse character of the community and to provide equitable access to opportunities and resources in all of Arcata's neighborhoods.

9. **LU-6b: Compatibility between agricultural and adjacent non-agricultural uses.** This section begins with "Agricultural practices can include spraying of herbicides, …." Do we want to legitimize the use of herbicides in Arcata by explicitly including this statement in our General Plan? I suggest striking "spraying of herbicides" and starting the section with, "Agricultural practices can include application of fertilizer, operation of farm equipment…."
10. **Principles and Goals**
    a. Add a statement regarding "acknowledging and acting on strategies brought forward by members of Arcata's Black, Indigenous, and People of Color communities." (In the draft there's quite limited one tacked on to Principle A. Please also avoid acronyms.)
    b. Locate and allow location of land uses to minimize risks and exposure to environmental hazards, including seismic hazards and flooding. (Even though this should ALSO be included as a SAFETY and an ENVIRONMENTAL JUSTICE principle, it's first and foremost a LAND USE principle and so should be up-front in this element.
    c. Seek and encourage open and cooperative consultation and cooperation with managers of state land not subject to Arcata's land use authority. (This refers to both the University and to the State's retained jurisdiction in coastal areas, as well as a few others.)
11. **LU-1i: Maintain Arcata's Historic Plaza Area as a major community center:** The draft policy and with "Residential units shall be included, where feasible, in all new commercial development within the Plaza Area." This repeats jist of LU-1f (Inclusion of residential uses). And an editing suggestion: Instead of "Residential units," "housing" is more meaningful.
12. **LU-2: Residential Land use** "Objective" – add: "Allow for a mix of housing types and densities to ensure residents at all ages, **income levels,** and abilities …"
13. **LU-4 Industrial Land Use** Objective: Hasn't the City been supporting industries for 150+ years? (Is 50 years a typo?)[Staff response – yes. We'll fix]
14. **LU-6a Agricultural and Natural Resource classifications – Agriculture Exclusive [A-E]:**
    a. Consider adding to the end of the A-E classification text *"Agricultural and aquacultural product processing facilities for products originating outside of Arcata, and which are essentially industrial and require large-scale industrial buildings* [add a threshold size?] *are not appropriate for the A-E zone."* (Presumably, existing ag-industries already approved may remain.)

13) I propose changing policy **LU-1c** as follows:
a) **Prioritization of transit and active transportation.** Reduce or eliminate minimum parking requirements citywide. ~~in areas where transit and active transportation is planned to support the transportation needs of the community, including neighborhoods where biking infrastructure, trails, complete streets, and transit is or is planned to be accessible.~~
i) I recognize that this policy was already changed based on my comments at a previous meeting. However, I worry that this current language accepts that there are areas of the city that we are choosing to leave un-walkable. My proposal makes this policy inclusive of the entire city.

14) **LU-2b: Diversity and choice in residential environments and LU-2c: Planned Development - residential.** These two sections represent another opportunity to incorporate wording to indicate that the **City encourages housing for all, including currently unhoused people**. I can suggest wording if we choose to do so.

15) **LU-6c: Protection of agricultural lands and uses within the City.** The second paragraph starts with "Private and public non-vehicular recreational activities such as hiking, riding, fishing, hunting, and other recreational activities…." I suggest we specify that the riding is non-motorized by adding that to the wording: "Private and public non-vehicular recreational activities such as hiking, ~~**non-motorized**~~ **compatible** riding, fishing, hunting, and other recreational activities…." **[Staff: work on this]**

16) **LU-1d: Streamlined Review and Standards in Infill Opportunity Zones**: We still haven't discussed what this will be, either in the Gateway, much less city-wide. *When will we discuss and resolve this? Let's not assume the model we adopt for the Gateway will hold City-wide. But it would be VERY CONFUSING if it doesn't!* I'm very uncomfortable including this as a policy unless we have those discussions BEFORE making a recommendation to the City Council. *I recommend changing this policy to* CONSIDER adopting *streamlined review and standards for Infill Opportunity "Zones".* Unless we have already addressed this in depth, include developing and adopting those changes as in implementation action.

17) **LU-1j: Encourage Valley West's growth as a major community center for north Arcata:** Eliminate the sentence "High density residential use in the Valley West Infill Opportunity Area will be streamline". It seems this is already part of the Infill Opportunity policy elsewhere, and we still haven't figured out what that "streamlining" will be. [develop objective standards to guide development review and approval…] staff needs to come back with these first.

18) **LU-3a Commercial-Central[C-C]** : 'The Commercial-Central Zone will continue to have no upper density limit'. *ADD: however, conditions of permit approval must avoid dangerous effects on public safety*.

19) **Table LU-4 INDUSTRIAL / PUBLIC FACILITY LAND USE CLASSIFICATIONS**

a) "EDUCATIONAL, CULTURAL & RELIGIOUS USES" are not listed for either of the Industrial zones. Would this prohibit vocational education facilities on an industrial site? (I support prohibiting K-12, daycare, or preschool facilities in Industrial zones.)

b) What is the point in including RELIGIOUS USES in this category? Can we eliminate mention of "Religious Uses" in this part of the Land Use element? (It doesn't show up there in our current LUC.) Remembering 1st Amendment rights, the City has little regulatory authority over "Religious Uses" beyond enforcing its own property rights on city-owned sites, and safety rules.

c) Urban Agriculture: I suggest allowing some "urban agriculture" on I-G and I-L sites, perhaps with a Use Permit to set appropriate conditions. Why is urban agriculture NOT allowed on Industrial sites (I-G or I-L), especially considering what IS allowed on them, and considering that industrial factories (with large-scale industrial structures) have been allowed on Ag Exclusive land? Which leads to …

20) **LU-1q State mandated housing production** -- The new proposed **LU-1q** works well. I like that this policy represents a City commitment to advocating for reasonable state approaches to housing production in a small city like Arcata. However, **I suggest ending the policy statement with "… meet both state objectives and City need for housing," omitting the end of the draft sentence**. The plan says that elsewhere.

21) **New Policy LU-6f Restoration of former tidelands.** I'd like to propose an additional land use policy for inclusion in the Ag section of the land use element.

a) **LU-6f Restoration of former tidelands.** The City of Arcata recognizes the need to restore former tidelands to salt marsh in order to adapt to rising sea levels and promote biodiversity and a safe environment. The City shall encourage and support the restoration of former tidelands, currently zoned Agricultural Residential [A-R] or Agricultural Exclusive [A-E].

1) **Table LU-4 INDUSTRIAL / PUBLIC FACILITY LAND USE CLASSIFICATIONS**
   a) Residential uses are allowed in I-L zones, though limited and requiring Use Permits. When we amend the Land Use Code and its Use Permit standards for residential uses of I-L sites, let's think clearly and protectively about what IS allowed there, and who is vulnerable to those hazards (even in I-L permitted uses).

Ideas for Discussion

11) LU-1k: Support and revitalize other existing neighborhood and commercial activity areas. This section promotes travel by walking, biking, and transit. One of its intentions to reduce vehicle miles traveled. Yet, it also encourages "improvement of parking." Do we want to also encourage the conversion of parking lots to other uses, such as housing, walkways, playgrounds, etc.? **develop language that focuses on other uses**

12) Housing density limits are not expressed quantitatively in this element. Nonetheless, I suggest we consider adding language to address the possibility of housing bonuses affecting the overall density of development.

   a) **LU-2a: Residential Land Use Classifications.** This section discusses different residential density zones. Given that the density bonus can be large and the rules covering the bonus are evolving rapidly, we can add language here so that we end up with a reasonable densities we can live with.
   b) **LU-3a: Commercial–Central (C-C):** The last sentence reads, "The Commercial-Central Zone will continue to have no upper density limit." Do we really want to say that? Would a 12-story building be allowed in this district?

Circulation

1) Consider changing the name of the Element to "Circulation and Mobility Element." Beyond simply adding the statement at the end of the introduction, full explanation that circulation and mobility do NOT necessarily relate only to vehicular transportation, with pedestrian and bike facilities tacked on, is important.
2) Consider **the following:**

2.7 INTRODUCTION

Circulation and mobility consider how people and goods move through and around the City. The circulation element addresses how a comprehensive, integrated transportation network can be planned to ~~achieve~~ maximize individual mobility in a manner consistent with community character and environmental protection. The City is committed to providing a complete, connected, multimodal transportation and mobility network. California law requires that transportation and land use policies be closely correlated. The Arcata General Plan accomplishes this in two ways. First, travel demand has been forecast~~ed~~ based on the amount and distribution of growth anticipated ~~allowed~~ by the land use plan. Second, ~~the policies of the~~ transportation, land use and air quality policies are linked ~~elements have been interwoven~~ to ~~provide a~~ balance ~~between~~ land uses and the transportation facilities that serve them. The overall theme of this element is achieving a balanced transportation and mobility system that is safe, accessible, comfortable, accommodating, and welcoming to all users. Transportation and mobility planning and policies in Arcata will put the safety of people first, both outside of vehicles and in them.

CONSIDER ADDING explanation here recognizing that mobility goes beyond just the transportation conditions focusing on vehicular roadways.

3) **Safety first:** Include clear wording in the Introduction, Guiding Principles and Goals, and throughout the Element's Policies to indicate that protecting and improving **safety must come first in all policies and transportation / circulation / mobility planning decisions.** Such wording is in line with a "Vision Zero" approach to transportation planning that strives to eliminate traffic-related death and injury as the highest priority in transportation planning, above and beyond speed, convenience, and financial cost. (Detailed suggestions for new wording are included in the "Track Changes" version of the MSWord draft Circulation Element.)

4) **Guiding Principles and Goals:** This entire section should be moved from the draft's current location to an up-front location immediately after the Element's **Introduction**. The **Guiding Principles and Goals** must be the basis for the rest of the descriptions, analysis, planning policies, and implementation actions that follow. In the draft, the **Guiding Principles and Goals** are hidden right before specific policies but AFTER the "Proposed Circulation Network," halfway through the Element. They should certainly precede, not follow, the "Proposed Circulation Network" section.

5) **Transportation and Mobility Equity,** & **Safety First:** Add explicit principle and goal, as well as explicit mention in relevant policies, of the City's intention to develop transportation and mobility policies and improvements to achieve mobility and transportation equity. Add to the "Principles and Goals" section" "The City recognizes that safe mobility is a right of all people in Arcata. The City will adopt policies and pursue plans that further transportation and mobility equity." Such changes should appear in the "Guiding Principles and Goals" section, and in other relevant policies and specific plans for improvement, as indicated in my detailed suggestions.

Guiding Principles and Goals

The City of Arcata shall:

A. Provide a connected multimodal transportation and mobility system ~~which allows~~that contributes directly to the safety, health, economic vitality, and quality of life of all people in Arcata. ~~residents.~~ ~~and efficient travel.~~

B.Recognize that safe mobility is a right of all people in Arcata. The City will adopt policies and pursue plans that further transportation and mobility equity.

~~A.~~ Put safety first in all transportation and mobility planning, policies, and projects.

~~B.~~C. Create a transportation system ~~which provides~~that incentivizes a choice of travel modes and is safe, accessible, comfortable, accommodating, and welcoming to all users.

~~C.~~D. Provide for increased use of active and shared transportation modes as alternatives to the single-occupant vehicle, including walking, rolling, bicycling, public transit, carpooling/vanpooling, and ridesharing.

~~D.~~E. Manage the street and highway system to promote more efficient use of existing capacities rather than increase the number of travel lanes.

~~E.~~F. Create a multimodal transportation system ~~which~~ that will improve the livability of residential neighborhoods, including use of methods to calm or slow traffic and reduce through-traffic on local neighborhood streets. ADD statement on varied ability mobility here

~~F.~~G. Educate residents, employees, and students about the importance of using alternative forms of transportation and mobility instead of the single-occupant automobile.

~~G.~~H. Promote land use patterns that encourage walking, rolling, bicycling, and public transit use.

H. Establish a set of ~~curb~~ fee-based parking prices that are high enough to ~~maintain an adequate supply of available spaces~~drive more active and shared transportation

6)

Policy Pitch Section

1) **Accessibility and mobility for people with varied abilities and disabilities:** Add explicit inclusive policies and language throughout the Element to address needs of people of diverse abilities and disabilities. (I have suggested detailed language in the "Track Changes" version of the Draft submitted to staff.) In the policy list, start with Policy T-1, BALANCED TRANSPORTATION SYSTEM WITH CHOICE OF MODES: After T-1e (or somewhere before): Insert this or similar policy –

a) **T-1f Improve accessibility and mobility:** The City shall undertake a comprehensive program to assess and improve accessibility and mobility for people of varied physical abilities and disabilities." (In the Implementation measures list, this should happen in the next 1-2 years.)

2) I propose we change policy T-6 in the following ways:

a) **Objective.** Manage parking to reduce the incentive for single occupancy vehicle use. ~~Provide an adequate supply of parking in perimeter lots downtown. Minimize the impacts of Cal Poly Humboldt State University parking into adjacent neighborhoods. Ensure that new development provides an adequate but not excessive supply of parking.~~

T-6a **Downtown parking.** The following shall apply to parking within the Downtown area:

~~1. Assess and plan for future parking needs. Municipal parking lots shall be provided in the perimeter of downtown to create an adequate parking supply to serve existing businesses, future development, and to replace on-street parking removed for pedestrian, bicycle, and landscaping improvements. One municipal lot is planned to complete the City's parking system, but Assess the need for additional parking lots may be provided if additional demand or opportunities arise.~~The City shall explore implementing a smart parking meter system in the Downtown area to manage parking demand while generating revenue to support public transit and/or active transportation.

b) The concept of "adequate supply" of parking seems to reflect the assumption that a particular land use or number of people automatically translates into a certain amount of driving and parking. The evidence doesn't bear out this assumption. Rather, we know now that the parking supply helps dictate the amount of driving. Reflecting this, and in alignment with the city's other mobility goals, it seems logical to establish an objective to manage parking to achieve mode shift, for example by charging for parking. For similar reasons, the idea of adding more parking lots to downtown based on "demand" seems outdated. Instead, managing parking through a smart meter system reflects modern best practices in parking management, and would reduce the subsidy for driving and create a new revenue source to help fund other city projects such as protected bike lanes and public transit. See the work of Donald Shoup for much more on this topic.

3) With regard to the **Gateway Area, within the Circulation Element**:

The draft's "**Proposed Circulation Network**" section addresses street and circulation changes City staff now propose in the draft Gateway Area Plan. Current language is "Additionally, implementation of mobility improvements within the Gateway Area Plan, including the "K" and "L" Streets couplets, and the 8th and 9th Street couplets extension, will alleviate traffic congestion within the Gateway and will ensure all trhasportation modes remain comfortable, convenient, safe, and attractive …" However, significant disagreement among Arcatans, is far from resolved, especially about the proposed K/L Street one-way couplet. I recommend the following:

The City should fully investigate and publicly assess detailed alternatives to provide access to the west side of the Gateway Area. ~~These will include a K Street / L Street one-way couplet, and detailed alternatives that would retain and improve the L Street corridor as a Class 1 bikeway, pedestrian way, and linear park, and retain K Street as a 2-way Arterial, with safety and traffic flow improved by possible means including new city-operated vehicle and pedestrian signals, left-turn lanes, on-street parking adjustments, and vehicle access to new development west of K and L Streets mainly via East-West streets; or other options including completing portions of M or N Street.~~

4) I propose we stop using Level of Service as a management consideration for city streets. And prioritize traffic calming and safety on all city streets regardless of classification. We can accomplish this through the following policy change:

a) Deprioritize LOS ~~shall not be~~as a management consideration for city streets. Decades of research and experience show that projects which attempt to relieve congestion and improve LOS simply attract more traffic and are ultimately unsuccessful. Furthermore, congestion is often desirable from a safety standpoint, as it results in slower traffic speeds. To that end, use LOS to reduce speeds and encourage mode shift. ~~Appendix A of this Element describes existing and projected traffic volumes and LOS for key City intersections. Although several unsignalized locations are projected to operate at LOS C or better, locations which experience higher volumes such as US 101/Sunset Avenue interchange, Alliance Road at Foster Avenue, Alliance Road at "M" Street/15th Street, and locations on 14th Street at "G" and "H" Street couplets are projected to operate at LOS D, E or F. Improvements anticipated by this plan (see Figure T-k) are expected to improve the LOS to acceptable levels for all intersections while balancing the priorities of active transportation goals. See appendix A for the complete analysis.~~

5) **Traffic signals in policy T-4b Vehicular Circulation**:

With anticipated population to 28,000, and much denser development patterns in much of the city, it will soon be time to reconsider the City's longstanding determination not to develop a traffic signal (traffic light) system of its own, above and beyond the CalTrans lights on Samoa Blvd and a few other high traffic locations. A Circulation Element policy would open that possibility:

3. Improvements at intersections. Improvements at intersections shall be designed to allow the safe, comfortable, convenient and accessible use of streets and walkways for all roadway users.
   a) Minor improvements at intersections. Minor projects to improve traffic safety include redistributing lane allocations and coordination of traffic signals. ~~Improvement projects shall be designed to accommodate the needs of pedestrians and bicyclists.~~

   The City shall consider developing City-operated traffic signals and signalized pedestrian crossings to accommodate new or denser land uses, traffic patterns, and safety concerns, especially Downtown, in the Gateway Area, and in the Giantuli / Valley West area.

   b) ~~6.~~ Minimize the installation of new traffic signals. New traffic signals shall be provided ~~only in instances~~ where there is no feasible alternative to relieve a ~~demonstrated~~ safety problem at an intersection ~~(based on documented accidents)~~. Alternatives which shall be studied prior to signals include roundabouts or installation and monitoring of all-way stop signs.

~~6. Minor improvements at intersections. Minor projects to improve traffic safety~~

6) **Transportation Advisory Committee: Policy T-4 4c 1** in the draft now hides the role of the Transportation Safety Committee within a single subsection of the sub-policy related to "Slowing Traffic." I suggest a broader role for a re-named, re-framed committee, possibly a **"Transportation Advisory Committee."** The Transportation Safety Committee's narrowly defined role is too easy for City staff and officials to overlook, and even now does not reflect the diverse community concerns that come before them. I suggest:

T-1g ADD POLICY: TRANSPORTATION ADVISORY COMMITTEE: The City shall consider renaming its Transportation Safety Committee, and broaden its role to advise City staff, Planning Commission, and City Council on matters related to transportation safety, and diverse community concerns related to transportation, circulation, and mobility safety and accessibility.

7) I propose the following changes to the section "Functional Classifications of the Street System":

a) All streets within Arcata city limits, with the exception of access-controlled segments of Highways 101 and 299 and certain rural roads, are lined with homes and businesses and will be

managed primarily to provide safe access and high-quality public space, regardless of functional classification. Slow speeds and traffic calming will be prioritized on all city streets. [delete the rest of the classifications]

The Federal Highway Administration's functional classification system is not a useful tool for guiding the design of city streets.This system is based on a suburban style of development that assumes dead-end local cul-de-sacs with houses on them feed into ever larger streets (collectors and then arterials) whose job is to get the residents of those houses to other places. Even in this context, the scheme fails, because most commercial destinations are concentrated on collectors and arterials, creating the deadly "stroad" effect of streets that are designed primarily to move cars at high speeds but also have lots of destinations and multimodal use for which they are not designed. In a gridded streets system, such as the one that prevails in much of Arcata, functional classification makes even less sense. Our city streets all serve multiple purposes - as places for walking, biking, rolling, driving, and riding from one place to another, but also for accessing our destinations and even for social gathering. Pretending that access is just for local streets while others (arterials and collectors) are primarily for moving people quickly around in the city, while ignoring that all of our streets are in fact lined with destinations that people need to access, is unhelpful and leads to dangerous designs. It is not a coincidence that traffic collisions in Arcata are concentrated on the designated arterial streets, which are designed for speed and capacity rather than for access and safety. We should abandon this inappropriate way of thinking about our street system.

b) If this is unacceptable, then as an alternative, I would propose adding this language as a header to this section. All streets within Arcata city limits, with the exception of access-controlled segments of Highways 101 and 299 and certain rural roads, are lined with homes and businesses and will be managed primarily to provide safe access and high-quality public space, regardless of functional classification. Slow speeds and traffic calming will be prioritized on all city streets. The language would serve as a reminder that even arterials should prioritize access and safety over convenience. This language would also be in more compliance with the "Complete Streets" policy included elsewhere in the plan.

8) I propose the following changes to the section titled "Operational analysis and intersection level of service (LOS) Summary:

a) LOS shall not be a management consideration for city streets. Decades of research and experience show that projects which attempt to relieve congestion and improve LOS simply attract more traffic and are ultimately unsuccessful. Furthermore, congestion is often desirable from a safety standpoint, as it results in slower traffic speeds. ~~Appendix A of this Element describes existing and projected traffic volumes and LOS for key City intersections. Although several unsignalized locations are projected to operate at LOS C or better, locations which experience higher volumes such as US 101/Sunset Avenue interchange, Alliance Road at Foster Avenue, Alliance Road at "M" Street/15th Street, and locations on 14th Street at "G" and "H" Street couplets are projected to operate at LOS D, E or F. Improvements anticipated by this plan (see Figure T-k) are expected to improve the LOS to acceptable levels for all intersections while balancing the priorities of active transportation goals. See appendix A for the complete analysis.~~

b) The effect of induced demand is well documented in transportation planning, and is even referenced in Arcata's own planning documents. Managing for LOS means adding vehicular capacity (whether that means adding lanes or making smaller "functional improvements"), but the principle of induced demand dictates that any resulting reductions in congestion will be temporary - the street will fill back up with more cars soon. Managing for LOS is just pretending

that induced demand isn't real, when we know it is. In other words, managing for LOS just doesn't work.

Instead of managing for LOS we should be managing to reduce vehicle miles traveled (VMT) in order to reduce environmental impacts. The State recognized this in 2013 with the passage of SB 734 which required all environmental studies for proposed projects in the state to switch from LOS to Vehicle Miles Traveled (VMT) as the critical measure of a project's impact. Previously, the state, its local municipalities, and its regional governments had been basing an assessment of a project's environmental consequences based solely on whether the project would create congestion. By focusing on VMT instead of LOS, CEQA now puts the planning onus on the reduction of car trips.

Furthermore, even if we could reduce congestion with engineering projects, it is not clear if that would really be desirable. Congestion, by definition, slows down traffic, and slower speeds result in greater safety for all road users. It's time for Arcata to stop prioritizing the annoyance of minor delays for drivers over the lives of community members and the environment. If fully rejecting LOS is out of the questions, other cities, like Seattle, have reformed their LOS to set specific target rates of transportation modes (e.g., walking, biking, transit, and driving) rather than solely focusing on driving.

9) I propose we update the section discussing the 2017-2022 (Transit Development Plan) TDP to state that the 2017 TDP is out of date, and a new one is about to be adopted. A 2023 Transit Development Plan will be adopted soon. The City shall make an effort to follow the recommendations in the 2023 TDP.

10) I propose the following changes to the section titled "Existing Bicycle and Pedestrian Facilities":

Arcata's bicycle transportation system consists of Class I off-street shared use paths, Class II bike lanes, Class III bike routes, and bicycle boulevards on public streets. Class I facilities are multi-use paths that provide a completely separated right-of-way for the exclusive use of bicycles and pedestrians with cross flows of motorized traffic minimized. Class II bike lanes provide a striped and signed lane for one-way bicycle travel on a street or highway within the paved area of a roadway. Class III bike routes are specially designated corridors in which the travel lanes are shared by motor vehicles and bicycles and are usually marked with on-street pavement stencils. Research has shown that Class III bike routes do not provide adequate safety or comfort for bicyclists unless significant additional design features are included. Bicycle boulevards are a type of Class III facility on low-volume roadways which prioritize the use of bicycles with traffic controls, signage, roadway markings, and traffic calming measures, including bicyclists having the right-of-way. Class IV bike lanes are protected from traffic by a vertical barrier. Arcata does not currently have any Class IV bike lanes, but research has shown that most people will not bike on busy streets without them.

Arcata currently provides a ~~comprehensive~~ bikeway network connecting most major areas of the City on primary arterial streets, but many of the current facilities do not provide adequate protection for the comfort and safety of bicyclists. The primary Class I shared use path along the L Street rail alignment provides a north-south connection from the southern City limits and to the Humboldt Bay Trail south to Eureka, connecting to Alliance Road north of the Gateway area, and connects to Foster Avenue at Sunset Avenue. Additional Class I facilities provide brief connections between existing roadways and on-street bicycle facilities. Most Class II bike lanes are located on north-south streets, while Class III bike routes and bicycle boulevards provide east-west connection on key streets. The western portion of the City (west of Alliance Road) is

least served by bike lanes, providing an opportunity to expand the bike lane system to encompass more residential areas. Figure T-h presents the existing bicycle and trail facilities.

See the discussion of Class IV bike lanes above for the reasoning for these changes.

11) I propose the following changes to the section titled "Proposed Circulation Network":

Arterial, collector, and local roads will provide access to new and established residential, commercial, and industrial areas, connecting those areas with the existing local and regional transportation system. Buildout of the General Plan land uses to year 2045 will increase multimodal~~,~~ access ~~and parking~~ demands and will result in areas already under stress to exceed acceptable limits for safety ~~and delay~~. ~~As presented in Appendix A Table T-3, forecasted traffic operations at several intersections are projected to degrade to LOS D, E, or F.~~

In order to accommodate the existing and planned land uses within the City, a robust network of multimodal safety ~~capacity~~ improvements will be needed. ~~Based on buildout of the General Plan land uses and forecasted traffic operations, Several improvements are planned for most of the intersections projected to operate deficiently, mainly installation of roundabouts.~~ At the US 101/Sunset Avenue interchange, the City is currently undergoing the Project Approval and Environmental Document (PA&ED) phase of the interchange improvement, which proposes to install two roundabouts at the interchange including pedestrian and bicycle facilities.

Additionally, implementation of the mobility improvements within the Gateway Area Plan, including the "K" and "L" Streets couplets, and the 8th and 9th Street couplets extension, will ~~alleviate traffic congestion within the Gateway and will~~ ensure all transportation modes remain comfortable, convenient, safe, and attractive to residents, workers, students, and visitors.

a) See the discussion above about LOS and congestion management for an explanation of these changes. Table T-5 and Figure T-k should be modified accordingly to remove projects motivated solely by congestion concerns.

[make this language consistent with the deprioritize]

Add Class IV facilities to Table T-6.

****

12) I propose that we make the following changes to Guiding Principle D:

Manage the street and highway system to promote more efficient use of existing ~~capacities~~ facilities rather than increase the number of travel lanes or make other capacity enhancements.

See the discussion above regarding LOS and congestion management for an explanation.

[make this language consistent with the deprioritize]

13) I propose the following changes to Policy T-1d:

Critical transportation facilities for emergency vehicle access and emergency evacuation shall be maintained and improved as a priority need. However, when determining needed improvements, ease and speed of emergency vehicle access shall at all times be weighed against safe design for all street users. Critical transportation facilities include the major routes into and out of the City such as Highways 101, 299, and 255, their interchanges with City streets and primary intra-city street connections including Samoa Boulevard, 11th Street, "G" and "H" Streets, Sunset Avenue, L.K. Wood Boulevard, Alliance Road, Janes Road, and Giuntoli Lane. Due

to the potential for structural failure of these facilities in a seismic emergency, alternative routes and procedures for their use shall be identified.

Emergency access is very important, but road design should not simply maximize emergency access or minimize response times in the absence of other considerations. Statistics indicate that more people in the US die from car crashes than from fires, crime, etc., so maximizing lives saved means that safe road design proposals can't be automatically vetoed only because of emergency access concerns.

14) Policy T-3: Ensure this policy is consistent with the adopted Regional Transportation Plan, which calls for doubling transit trips by 2025, again by 2030, and again by 2040.

15) I propose the following changes to Section T-3a:
The City shall ~~maintain~~ improve the existing A&MRTS routes (as shown in Figure T-de), frequency, and level of service as funding permits ~~until increased demand, additional development, and transit planning studies identify the need for either route modification, an expanded route system, or increased service on existing routes. The transit planning studies should evaluate the cost-effectiveness and feasibility of increased routes and service based on projected capital and operating costs, fare box recovery, and state and federal subsidies (see Policy T-3c for planning criteria).~~

The city can't meet its goal to increase transit ridership just by maintaining existing service levels. We have to improve the service as funding permits.

16) I propose the following changes to Policy T-3c:
Public transportation is both a civil right and a critical climate solution, and should be designed to provide service competitive with automobile travel in terms of access, convenience and comfort. Potential improvements to the transit system should be assessed according to the best available evidence of both need and existing and induced demand. ~~an enterprise activity and its services must be designed to be as efficient and productive as possible. As a transit operator, the City must balance demand with resources for a sustainable system. The City shall consider adding transit routes or modifying existing transit routes and level of service based on the transit planning efforts described in Policy T-3a. Criteria to evaluate and identify thresholds for changes to the A&MRTS system shall be developed. General guidelines for planning future routes and service include:~~
~~1. Accessibility of route to residents and employees. Calculate the number of people living or working within walking distance of the route (typically 1,000 feet). Assuming 1% to 8% of that population would use transit (based on existing transit mode share by census block), determine if the route will serve an adequate population for cost-effective service.~~
~~2. Review the housing density within the proposed route corridor. Minimum densities of at least seven dwelling units per acre are necessary to support local transit service. Ideally, the average housing density within a transit corridor or transit served nodes should range between eighteen to twenty dwelling units per acre, depending on the proximity to stops.~~
~~3. Evaluate the efficiency and directness of future routes. Compare bus travel time with automobile travel time to avoid a disproportionality which favors automobile use. Determine if the route requires inefficient loops which take riders out of their way and discourages transit use. Design routes to be as direct as possible with turnarounds at endpoints.~~

~~4. Evaluate the diversity of the destinations served. Efficient routes serve a diversity of land uses including residential, employment, schools, and shopping. Evaluate the number of activity centers connected by the route and the transfer opportunities provided.~~

While I acknowledge that there are legal and practical limitations to the city's ability to provide public transportation, I believe it is counterproductive to view it as a "business" rather than as a basic right. We do not ask roads to pay for themselves (and they don't), and we shouldn't ask public transportation to do so either.

Additionally, while there is nothing inherently wrong with the enumerated planning guidelines, I believe it is preferable to allow the guidance to evolve as evidence and best practice evolve, rather than immortalizing them in the General Plan.

17) I propose the following change to Policy T-3b:

Short- and long-range transit plans shall be coordinated with the regional transit service provided by the Redwood Transit System. The City supports regional transit plans which improve service and timed transfers, and reduce headways for intercity travel. In the interest of enhanced coordination and efficiency for local and regional service, the City shall immediately begin planning to merge A&MRTS with the Humboldt Transit Authority. **[make this language more broad to include evaluation and potential merger]**

a) All other major transit services in Humboldt County are managed by HTA. Fully integrating A&MRTS into the HTA system will allow easier coordination and greater efficiency. I am aware that this has been discussed for years, but I can think of no good reason not to do it.

18) I propose the addition of a Policy T-3h:

T-3h. The City shall study investigate the possibility of pairing its traditional fixed-route bus system with an on-demand microtransit system which could serve lower density areas and feed into the fixed route system to increase transit mode share.

a) Significant technological advances and planning innovations have occurred in public transit since the last General Plan was adopted. It is increasingly accepted in transit planning that microtransit can be a good option for areas without high enough density to support traditional fixed-route buses. The city should explore this possibility for improving the transit system.

19) I propose the following change to Policy T-4 Objectives:

Plan an internal street system the circulation network consistent with Figure T-k and Figure T-i and Arcata's small-town, non-metropolitan character to create Complete Streets solutions that are appropriate to individual contexts; that best serve the needs of all people using streets and that support the land-use, climate, safety, and environmental quality targets and policies of the City and which: 1) efficiently utilizes existing facilities and reduces need for investment in new or expanded street and highway facilities or capacities; 2) improves connectivity of streets to provide for direct routes between origins and destinations; 3) has a high quality of regular maintenance and repair~~; and 4) maintains a level of service which minimizes delays, but allows for higher levels of congestion during the short peak periods on weekdays~~.

a) See above discussion of LOS.

[make consistent with deprioritization]

20) I propose the following modifications to the section titled "No additional vehicular travel lanes":

Street projects shall not be designed to improve vehicular traffic flow ~~shall emphasize intersection improvements and facility maintenance~~. If congestion occurs, it shall be welcomed or managed using alternative methods such as diversion of trips to other travel modes or intersection

improvements. Construction of additional ~~arterial street~~vehicle travel lanes shall not be considered ~~only when no other feasible congestion management methods are available~~ and if unless it supports the land-use, climate, safety, and environmental quality targets and policies of the City.

a) See above discussion of LOS and congestion. These edits reflect the fact that adding lanes is not the only way to increase capacity, and that the principle of induced applies to any increase in capacity.

[make consistent with deprioritization]

21) I propose the following changes to Policy T-4c:

The City shall employ ~~the following~~a range of measures to reduce speeds and "calm" traffic throughout the city ~~in the various commercial areas, near schools, public recreation areas and in residential neighborhoods~~ to improve safety and comfort for those walking, rolling, biking, and taking transit

a) Traffic calming is critical for safety, and there is no reason to limit this safety work to only certain areas of the city. This is related to the thinking about functional classification, which has resulted in dangerous arterial street designs.

22) I propose the deletion of Section T-4c.4:

~~4.All neighborhood streets shall remain open to through vehicle travel unless there is a demonstrated safety problem that cannot be adequately addressed through the measures identified above.~~

a) The "Slow Streets" movement has shown how effective it can be to close local streets to through traffic, for improving safety and invigorating neighborhoods. There's no reason to take this option off the table in Arcata.

[implementation measure - City shall consider implementing a slow streets program…]

23) Table T-7: Add stop signs back into the list of traffic calming measures; Add lowered speed limits as allowed by law.

24) I propose the following change to Policy T-5a.2:

Maintain existing bicycle routes and provide additional routes where feasible connecting the various neighborhoods with Cal Poly HumboldtState University. Class ~~III~~IV bike lanes shall be provided on routes with the highest bicycle demand, or where there is sufficient right of way.

a) See above discussion about Class IV bike lanes.

25) I propose the following changes to Policy T-6:

Objective. Manage parking to reduce the incentive for single occupancy vehicle use. ~~Provide an adequate supply of parking in perimeter lots downtown. Minimize the impacts of Cal Poly Humboldt State University parking into adjacent neighborhoods. Ensure that new development provides an adequate but not excessive supply of parking.~~

T-6a **Downtown parking.** The following shall apply to parking within the Downtown area:

1. ~~Assess and plan for future parking needs. Municipal parking lots shall be provided in the perimeter of downtown to create an adequate parking supply to serve existing businesses, future development, and to replace on-street parking removed for pedestrian, bicycle, and landscaping improvements. One municipal lot is planned to complete the City's parking system, but Assess the need for additional parking lots may be provided if additional demand or opportunities arise.~~The City shall explore

implementing a smart parking meter system in the Downtown area to manage parking demand while generating revenue to support public transit and/or active transportation.

a) The concept of "adequate supply" of parking seems to reflect the assumption that a particular land use or number of people automatically translates into a certain amount of driving and parking. The evidence doesn't bear out this assumption. Rather, we know now that the parking supply helps dictate the amount of driving. Reflecting this, and in alignment with the city's other transportation goals, it seems logical to establish an objective to manage parking to achieve mode shift, for example by charging for parking.

For similar reasons, the idea of adding more parking lots to downtown based on "demand" seems outdated. Instead, managing parking through a smart meter system reflects modern best practices in parking management, and would reduce the subsidy for driving and create a new revenue source to help fund other city projects. See the work of Donald Shoup for much more on this topic. Verify this has been changed.

26) I propose the following changes to Policy T-8a:

Developers shall be required to construct transportation improvements along their property frontages. Where appropriate, a traffic impact study shall be required which identifies on-site and off-site impacts and mitigation measures.

The developer shall be required to provide all necessary access and circulation facilities within the property and such facilities shall be designed to meet City standards. The following improvements may be required, based on the individual context and the needs of all people using streets and the right-of-way; and that support the land-use, climate, safety, and environmental quality targets and Complete Streets policies of the City:

1. If development is located on an existing street:
   a. dedication of right of way;
   ~~b. widening of street along property frontage to provide for a travel lane;~~
   c. bicycle lane and parking lane;
   d. reconstruction of curb, gutter and sidewalk;
   e. transit facilities and landscaping within the right of way.
2. If development is located in a new growth area not served by streets:
   a. dedication of right of way to construct a street to connect the project site to a public street, which accommodates all modes of transportation, particularly those walking, rolling, biking, and using transit;
   b. construction of the street and connecting intersection(s) to City standards;
   c. after the dedication is accepted, the City will maintain the street.
3. In all instances, the developer shall be responsible for mitigating any off-site ~~traffic~~ mobility impacts of the proposed development in a manner consistent with the policies of this plan. Measures may include ~~a reduction in the size or density of the development;~~ installation of additional pedestrian, bicycle and transit amenities to encourage alternative travel modes; or implementation of Transportation Demand Management measures.

See above discussion of LOS and congestion management.

****

27) I propose the following change to Policy T-8c:

The City may adopt a citywide traffic impact fee to fund transportation improvements to mitigate the ~~traffic~~ mobility impacts of new development. The traffic impact fee may substitute in whole or in part for the off-site mitigation requirements described in Policy T-8a, but would be in addition to the developer's responsibility for on-site and frontage improvements. The traffic impact fee may be used to fund roadway extensions, intersection improvements, safety improvements, transit facility improvements, and pedestrian and bicycle facilities or amenities.

a) This change is to reflect the discussion of LOS above, to ensure that the focus is on multimodal mobility, not traditional "traffic impacts," i.e., congestion.

28) I propose the following change to Policy T-8d:

A&MRTS should continue to fund capital and operating expenses through fare box revenue, Cal Poly Humboldt State University subsidies, and state and federal subsidies. The City will explore the possibility of new development contributing a one-time fee towards A&MRTS capital expenses through the citywide traffic mitigation fee ordinance and funding transit through parking meter revenues where feasible [or some language like this].

b) See above discussion of metered parking.

Public Facilities and Infrastructure

1. **PF-2a Capacity and management of City wastewater collection system** – Add language at the end of the policy: "… The City shall consider adopting building and land use code policies that provide incentives for design, operation, and technology for buildings and sites to minimize wastewater as well as stormwater loads." *(We already have policies for minimizing stormwater flows to sewers in the MP4 program. This would add policies to reduce wastewater discharges to sanitary sewers, and thus loadings to the WWTP.)*
2. **PF-2d Composting and beneficial reuse of biosoli**ds …: Add language at end of policy: "… This requires the City to protect the quality of its sludge by implementing an industrial and high-volume discharger wastewater pre-treatment program. (See Policy PF-2g Source Control Program, below.)" **[staff: this is unnecessary]**
3. **PF-2e Treatment of wastewater from other communities** – Add language at end of policy to read "… The City shall not enter into any new agreements for processing wastewater from other communities, nor shall the City accept additional loadings from any connection from other communities through the Fieldbrook Glendale system." *(This may seem like overkill, since the contracts probably already mention this, and LAFCo should also have insisted on it. But it's important NOT to take it for granted! There have been several recent cases in which water supply extensions in the county have been proposed to do similar things, such as getting water to the proposed Casino hotel in Trinidad by extending water lines from McKinleyville)*
4. **Policy PF-3 STORMWATER MANAGEMENT** – Cut "… and acquire easements and properties for effective drainage management" from the goal list. This is a policy means to achieve the goals, not a goal in itself. The Policy is already stated in **PF-3e.**
5. **PF-5e maintenance of City streets and rights of way**—Add language at end of policy: "…The City shall comply with Americans with Disabilities Act requirements as a minimum, and seek to develop City rights-of-way beyond those requirements to safely accommodate mobility by people of all abilities and disabilities."

6. **POLICY PF-6 INTEGRATED WASTE MANAGEMENT –** Add language at end of "Objective": "… Coordinate with regional bodies to develop effective regional solid waste management systems."
7. **2.12 IMPLEMENTATION MEASURES** – Add as an implementation measure to review and update the WWTP operations and facilities plan periodically to take into account changes associated with sea level rise and climate change. This is either an ongoing or periodic action, which would implement **PF-2b Arcata wastewater treatment system.**
8. **PF-5a: Facilities for community service and private organizations.** Suggest adding the bold phrase in this first sentence: "Community service organizations, as well as non- profit and private organizations **serve an important and vital role in the health of our community and** offer shelter, assistance, training and other human services."
9. **PF-6a: Source Reduction.** Suggest replacing #6 with the following: **"Moving away from using paper copies for as much City business as possible by working with electronic mail, forms, and agendas, and re-using of scrap paper if possible, if copying is necessary."**
1. Specific suggestions for the "Guiding Principles and Goals" appear here, even though they are now later in the Draft Element **[Staff: unclear what the add is]**:NOTE: added language is the gold language.

Guiding Principles and Goals.

A. Provide an adequate, safe, and affordable water supply and delivery system for day-to-day and emergency needs.

B. Maintain and improve wastewater management systems that will protect water quality in an affordable manner by updating wastewater technology and reducing wastewater and stormwater loads that the City must treat. Maintain the Arcata Marsh and Wildlife Sanctuary as an exemplary model of how natural systems can be effectively and efficiently used to treat and reclaim wastewater.

C. Utilize natural systems and processes for managing stormwater with preference for approaches that reduce stormwater flows to City facilities while also preventing undesirable flooding.

~~D.A. Promote lifelong learning by supporting educational facilities and programs at all levels.~~

~~E.A. Recognize that public facilities are the primary gathering places for social, cultural, political, educational and entertainment events/celebrations, and that these facilities are important components of the community's identity.~~

D. ~~Advance~~ Meet state-mandated waste diversion goals ~~set forth in state mandates~~ and the City's Zero Waste Action Plan. Arcata will strive to become a leader in developing small city waste reduction programs. ~~Publicly advocate reducing solid waste as the first priority for waste management; and promote recycling-based manufacturing through: City purchase of recycled products, education, and community support. Support new technology and education programs that reduce solid waste by an additional 10% every five years and maintain a long-term strategy for achieving "Zero Waste".~~

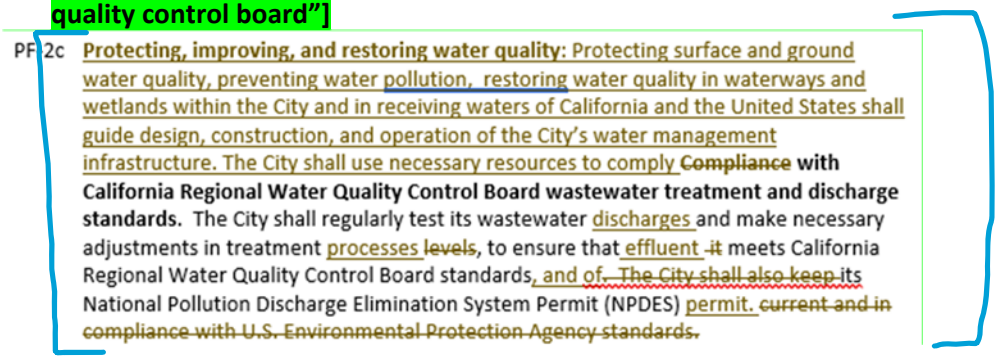
E. Promote lifelong learning by supporting educational facilities and programs at all levels. The City government will encourage educational institutions to cooperate with the City to achieve City goals in our shared space.

F. Recognize that public facilities are ~~the primary~~ gathering places for social, cultural, political, educational and entertainment events and ~~/~~celebrations, and that these facilities are important components of our ~~the~~ community's identity. Protect public civil and Constitutional rights in Arcata's public sphere, and especially on City property and public rights of way, and in any facility that receives City support.

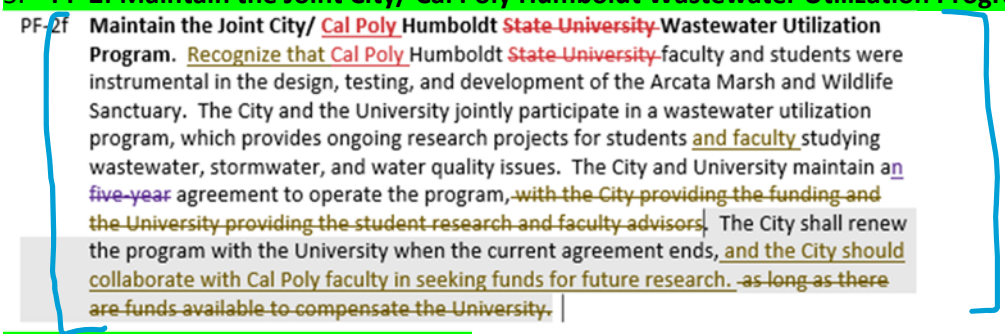
~~2.~~ **PF-2b Arcata wastewater treatment system** – Add language at the end of the policy: ~~"… Goals, priorities, planning assumptions, and the best available science on which they are based, shall be reviewed publicly through City committees and the Planning Commission."~~"… Goals, priorities, planning assumptions, and the best available science on which they are based, shall be reviewed publicly through City committees and the Planning Commission at the discretion of the City Council."

[Staff: This would be supported by staff if the specificity of committees and commission was removed. All of these policy choices are vetted publicly, and the Council will likely want the ability, not the requirement, to refer such decisions to committees or the Commission as it chooses.]

3. **POLICY PF-4 EDUCATIONAL FACILITIES. Objective.** This section currently reads: "Identify student enrollment increases, based on the projected future population of the City, and coordinate with local school (public and private) districts, Cal Poly Humboldt State University, and other education providers to maintain and improve educational facilities and services, **while preserving established community/student ratios.**" In light of the expected growth of Cal Poly Humboldt, can we realistically expect to "**preserve established community/student ratios**." I suggest we can't. Do we want to change this wording? Proposed change: Delete it **preserve established community/student ratios.**
4. PF-2c Change and add **[Staff: change "California" to "state" and "compliance with the state water quality control board"]**


PF-2c **Protecting, improving, and restoring water quality:** Protecting surface and ground water quality, preventing water pollution, restoring water quality in waterways and wetlands within the City and in receiving waters of California and the United States shall guide design, construction, and operation of the City's water management infrastructure. The City shall use necessary resources to comply ~~Compliance~~ **with California Regional Water Quality Control Board wastewater treatment and discharge standards.** The City shall regularly test its wastewater discharges and make necessary adjustments in treatment processes ~~levels~~, to ensure that effluent ~~it~~ meets California Regional Water Quality Control Board standards, and of. ~~The City shall also keep its~~ National Pollution Discharge Elimination System Permit (NPDES) permit. ~~current and in compliance with U.S. Environmental Protection Agency standards.~~

5. **PF-2f Maintain the Joint City/ Cal Poly Humboldt Wastewater Utilization Program** –


PF-2f **Maintain the Joint City/ Cal Poly Humboldt ~~State University~~ Wastewater Utilization Program.** Recognize that Cal Poly Humboldt ~~State University~~ faculty and students were instrumental in the design, testing, and development of the Arcata Marsh and Wildlife Sanctuary. The City and the University jointly participate in a wastewater utilization program, which provides ongoing research projects for students and faculty studying wastewater, stormwater, and water quality issues. The City and University maintain an ~~five-year~~ agreement to operate the program, ~~with the City providing the funding and the University providing the student research and faculty advisors~~. The City shall renew the program with the University when the current agreement ends, and the City should collaborate with Cal Poly faculty in seeking funds for future research. ~~as long as there are funds available to compensate the University.~~

Change shall to should in last sentence.

(*Considering the additional burden that Cal Poly's expansion will impose on the City's treatment system, directly and indirectly, paying for research into the system's future operation improvements should be a JOINT funding effort, especially since the environmental and civil engineering focus at the new Cal Poly should enable the University/City collaborative to seek grants to fund the research. In fact, the University should probably provide money to the city for this, rather than the other way around!)*

6. **PF-1c Water Conservation** – Add language at the end of the policy: …
7.
8. "In response to extreme water shortages, the City may consider imposing sharply graduated excessive use rates and/or excessive use fines, additional forms of water rationing, warnings, and physical flow restrictions to water users who fail to respond to less severe sanctions.

[[add Rachel's first and last sentence.

Building and site development permits that require connections to the City's water system shall incorporate water conservation design features and best management practices." *(Presumably, objective standards for those design features and BMPs will be defined somewhere in the building or land use code, or by state standard.)*

Other Matters

3. **PF-5d: Telecommunications facilities.** This section states that, "These facilities shall be screened from view and associated equipment rooms and switching devices shall be designed and landscaped to blend with their surroundings." The new facility at 11th and M Streets does not meet these conditions. Can that be remedied?
4. **General:** *There are several situations where we should consider possible zoning changes reflecting recent status of uses that might be considered for Public Facility zoning, or Public Facility zoning that should be considered for other potential uses. It would be important to solicit input from the management and owners of those facilities. These include such sites as the Mad River Community Hospital (current site Master Plan to be updated); UIHC/Potawot (some of the site covered by conservation easement); Open Door Community Health Clinic (serves some public needs, including emergency facilities); HealthSport (privately owned/ managed facility after initial public partnership); and possibly others. It would be useful to provide some pathway for charter schools NOT operating on school district property to have some pathway to develop permanent facilities that would be zoned as Public Facilities, rather than jury rig the current underlying zoning to accommodate them.*

Develop some language around other public facilities and add it to the PF Element, then reference the LU Element

5. The "Guiding Principles and Goals" (now p. 2-78 of Draft) should be moved to the BEGINNING of the element, before the overview of current facilities. They are intended to be the basis of the analysis of planning needs, and of the policies and implementation actions that follow.
6. An introduction paragraph should be added at 2.10, indicating which facilities & infrastructure the element addresses, and which it explicitly does NOT address, including park and open space material that appears in the open space and conservation Element(s), healthcare facility material (if we decide NOT to add it here), etc.
7. Move the sections of the Element about schools and other public facilities NOT related to water or sanitation either to the beginning of the element (before the parts about water and sanitation) or to the end. But don't strand them between the wastewater and the garbage! That re-ordering should happen in both the "Overview" part and the "Policy" part of the Element.
8. Make the changes in brown below

POLICY PF-4 EDUCATIONAL FACILITIES

ARCATA HIGH SCHO

Objective. Value Arcata's educational institutions and facilities as keys to achieving the high educational standards that will lead to prosperity and community wellbeing. Enlist schools and the University in support of Arcata's future prosperity, and our diverse and tolerant cultures. Seek the cooperation of Arcata's educational institutions to achieve City goals. Identify student enrollment increases, based on the projected future population of the City, and coordinate with local school (public and private) districts, ~~Cal Poly Humboldt State University~~, and other education providers to maintain and improve educational facilities and services. Coordinate with Cal Poly Humboldt to project demand for City services and facilities based on anticipated increases in enrollment and employment. ~~, while preserving established community/student ratios.~~

PF-4a **Coordination with Arcata, Pacific Union, and Jacoby Creek school districts, the Northern Humboldt Unified High School District, and with Charter School operators.** The City shall provide demographic information to assist the School Districts and charter schools in projecting future student enrollments. The City shall encourage the school districts and charter schools to expand existing schools rather than designating new sites for this purpose.

9. *PF-4aClarify how the Plan will treat Charter Schools, which are public schools, that do not operate in buildings and facilities zoned for "Public Facility" use. There are (or have recently been) a few actual private schools, also operating in facilities not zoned for "Public Facility" use.* **[public and charter schools are allowed in all residential zones, in the creamery district, in the gateway area, and in Public Facilities zoned parcels]**
10. **PF-6a Source reduction – Almost all of the "examples of effective source reduction and reuse activities that shall be promoted" are private personal actions, largely unrelated to City actions or policies. They may (hopefully) seem routine by 2045. They don't seem appropriate to include in this Plan. The exception which should remain is #9, which is a City policy/action, and should remain: "Incentives such as on-call garbage collection and differential solid waste fees shall be used to encourage source reduction." [proposal is to delete this section.]**
11. **PF-1a: Suggest striking the phrase, "…though the City is well within its water allotment." It is not necessary and is out of place.**

PF-1a**Water supply.** Surface and subsurface water quantities that supply the City are dependent on rainfall and adequate upstream storage. The City shall continually monitor the water quantity and quality in its system and adhere to the Humboldt Bay Municipal Water District's rationing system to ensure that adequate supplies reach all users, ~~though the City is well within its water allotment~~.

12. **Page 2-80: HBMWD's Rationing System: The percentage in #3 is incorrect. It currently reads, "…when Ruth Lake reaches 30% capacity…" It should read, "…when Ruth Lake** reaches **70%** capacity…" **[Delete the box related to PF-1c but refer to the HBMWD policy in the text.]**

9. **PF-2b:** Suggest inserting the bold phrases into the last sentence and rewording slightly to read: The City **acknowledges that it must plan for the possibility of a 1 meter sea level rise by 2050 and** shall ensure ongoing treatment system planning, investments, **and mitigations** are consistent **with this possible sea level rise, while balancing** the City's existing investments with habitat restoration and sea level adaptation priorities. **[[Discuss with LCP]]**

[Staff: This is not the adopted policy of the City and we would not suggest we make it so. The NOAA guidance eliminated the H++ scenario for the purposes of SLR planning. The H++ predicts up to a meter by 2050. This language needs to be finessed if adopted to reflect the policy work that has led up to this point]

10. **Page 2-76: The Zero Waste Action Plan calls for, "… a goal of achieving 90% landfill diversion by 2027." Is this realistic? Do we want to continue to claim this? [ES can verify and update the date]**
11. **Page 2-77: Are we conforming with AB1383? This seems like a huge effort. How will the City do this? What is the timeline? [have ES provide information on this]**

Editorial Suggestions

The "Overview" sections for each set of facilities refer to many management plans. Note that all of these must presumably be (or be amended to become) consistent with the General Plan.

Editing: Indicate in the element WHEN (the YEAR) each of these plans was adopted or most recently updated. Readers should know the plan is adopted in 202(4?) so that most recent version is as of now. As elements are amended in the future, those dates can also be updated.

Format: Avoid text boxes that use less than the full width of a page in a digital version. The "side-by-side" formatting makes the document difficult to move between digital formats.

Consider adding a section about health care facilities. Even though that may also appear in the "Healthy City" element (if such a thing will really exist!) it's important to at least mention Mad River Community Hospital, United Indian Health Center/ Potawot, and Open Door Clinic, since their presence and development all also have significant land use and service implications.

Revise basic info about schools in Arcata according to the editing suggestions I've provided in the MSWord "track changes" version I'm submitting attached to the same email as this set of suggestions. My suggestions are detailed and extensive.

The Overview / background about changes in state solid waste diversion policies should be shortened (as suggested in the "track changes" version I've submitted), remembering that the Plan looks forward and must still make sense to someone reading it in 2045. The background of increasingly stringent state regulation should focus on goals that Arcata must reach, and on the idea that Arcata needs to anticipate more stringent state regulation, and that Arcata can become a small town leader in progressive waste management.

Public Safety

1. I propose adding a new policy PS-8g
   a. **Traditional ecological knowledge***:* The City of Arcata acknowledges the value of Indigenous sciences and knowledge and the need for Indigenous perspectives in responding to the climate change crisis. The City shall work to support Indigenous-led climate adaptation approaches and shall work collaboratively with tribes and tribal governments for mitigation, adaptation, and resilience to climate change. This policy applies to all previous policies in this section.

b. Traditional ecological knowledge holds important information regarding adapting to climate change and developing a more sustainable and safe community.

2. I Propose adding a new policy PS-5f
   a. **PS-5f: Smaller Fire Trucks** The City and Arcata Fire District shall jointly investigate the feasibility of purchasing smaller fire trucks that are more maneuverable and perform better on pedestrian friendly streets.
   b. Large fire trucks often require wide streets that are unsafe. Cities across the country are exploring purchasing smaller fire trucks like those used in the rest of the world in order to allow safe fire access while preserving safe streets. See article for more details: https://usa.streetsblog.org/2018/12/10/safety-officials-to-cities-stop-buying-such-huge-trucks/

[Staff: This could probably be an implementation measure instead of a policy. If adopted on consent, we will move it to the implementation measures]

Policy Pitch

1. I propose adding a new policy PS-7g
   a. PS-7g: **Reducing Armed interactions with the Police** The City of Arcata recognizes that unnecessary interactions with armed police officers have the potential to end tragically. The City and the Arcata Police Department shall jointly explore opportunities to reduce interactions between members of the public and armed police officers.
   b. This goes along with the antiracism section above. Obviously, there is a need for an armed police force. But many interactions with the police do not require an armed officer, for example routine traffic stops. I think it would be fruitful if the City and the Police Department jointly explored opportunities to reduce these kinds of unnecessary interactions. This article covers why these kinds of reforms are necessary and also discusses some of the efforts other cities are making. https://www.theguardian.com/us-news/2022/apr/21/us-police-violence-traffic-stop-data **[Staff: see above PS-7f recommendation]**

2. I propose adding a new policy PS-7f
   a. PS-7f: **Anti-racism** The Arcata Police Department shall institute policies and trainings in order to combat and prevent both systemic as well as overt racism within the Depatment.
   b. Felt like it was missing from this section.

[Staff: instead of PS-7f and -7g, propose: PS-7f. Principled Policing The Arcata Police Department shall conform to State and Federal law, California Peace Officer Standards and Training (POST) standards, Department policies, and 21st Century Policing best practices to combat racial profiling and bias in policing and to promote de-escalation and principled policing.

(Adopted and Added to conflicts table: The Arcata Police Department shall institute policies and trainings in order to combat and prevent both systemic as well as overt racism within the Department.)

13. **PS-6g: Hazardous materials education program.** Suggest including the following sentences shown in bold: The City shall work with the Humboldt County Health Department and the California Department of Toxic Substances to develop **and promote** educational materials explaining hazardous materials' impact on people, plants, and animals, and provide information on alternatives to hazardous materials. **The City shall also keep a compendium of Material Safety Data Sheets (MSDSs) for all potentially hazardous materials that are used by all departments in the City. All this information—including the MSDSs**—shall be made available to the public. **[Staff: this is unnecessary as it is required by law. But we can add it if the commission wishes to.] "city**

promotes public education about storage, use, and release of hazardous materials." "implementation measure to identify how folks can learn about the City's MSDS forms" refer to illness prevention program.

14. **Implementation Measures. PS-7:** Add the following: **The City will maintain and have available all MSDSs for hazardous material utilized by the City. [Staff: this is unnecessary as it is required by law. But we can add it if the commission wishes to.]see above**

15. PS-8d: Sea Level Rise. Suggest inserting the following sentence and phrase shown in bold: "**Using guidance from the State and other climate scientists, the City will plan for a sea level rise of 1 meter in the year 2050. Using this assumption, the City will** incorporate consideration…." (Also, the word "local" in the last sentence has a typo.) **[Staff: we recommend against committing to a specific elevation or set of guidance sources. The science is evolving, and the Council should commit to adaptation based on adaptive pathways, given latest science and social impact over time.]**

Historic Preservation

Consent

1) Make the following change to **H-6a.**
   a) **H-6a General Incentives for Historic Structures and Sites.** Those properties listed as Historic Landmark or as Potentially Historic structures or sites shall be eligible for the following incentives and assistance:
   1. Exemption from the requirements to provide any additional off-street parking, ~~except for additions 200 or more square feet in size~~.
   b) We need to reduce reliance on cars, so elimination of the off-street parking requirement makes sense.
2) I propose we change Policy H-4 in the following way:
   a) **Objective.** The Central Arcata, Arcata Heights, and Bayview neighborhoods, are designated Neighborhood Conservation Areas. Ensure that new construction, modifications or alterations of historic structures, and significant changes to other structures are harmonious with established and planned neighborhood elements within ~~the existing character of~~ the Central Arcata, Arcata Heights, and Bayview neighborhoods.
   b) Pitch: We already made a similar change in the Land Use Element. This language is less vague and doesn't carry the same negative connotations.
3) I propose we change Policy H-4 in the following way:
   a) H-4b **Design review.** All structures located within an NCA shall be subject to design review and approval. Prior to approval of any exterior change requiring a building permit, the Design Review Authority shall make a finding that the alteration or addition is compatible with established and planned neighborhood elements and does not destroy the historical or architectural elements ~~character of~~ the property~~, or the surrounding neighborhood conservation area~~.
   b) Pitch: We already made a similar change in the Land Use Element. This language is less vague and doesn't carry the same negative connotations. **[Staff: The historical elements on listed or potential resources will be protected through CEQA]**
4) **H-1 DESIGNATED HISTORIC LANDMARKS Objective:** Designate and preserve significant buildings, structures, and sites that are representative of the city's social and physical development ….

a) ADD at end "Support property owners' efforts to preserve, restore, and adapt use of significant structures and sites for continuing significance."

5)

Policy Pitch

1) Make the following change:
   a) **H-2d Design review approval.** Design Review and approval shall be required from the appropriate review authority for all exterior alterations to ~~noteworthy structures~~ potentially historic structures, when or if alterations require a building permit, including changes in types of materials and additions. The review authority may request a recommendation from the Historic Landmarks Committee prior to its decision on the project. In the event that the City reasonably believes that a structure may be potentially historic but said structure is not on the potentially historic buildings list, the National Register or listed as a local, state or national landmark, the City shall initiate the process of listing the structure on the potentially historic buildings list. If the City decides to initiate such listing process, the permit shall not issue pending completion of that process.
   b) Not sure what a "noteworthy" structure is – it is not defined - so I suggest changing the term to make it consistent. More significantly, the City may or may not be able to keep current its listing of potentially historic buildings. In order to prevent a building that is historic but not on the list from falling through the cracks, I propose adding language that requires some level of review to determine whether an unlisted property is or is not a potentially historic resource.
2) Implementation measures
   a) Make all implementation measures "ongoing".
   b) Should we say each implementation measure should be "ongoing," rather than adopt a specific time frame? I don't know how realistic the stated time frames are and don't see the harm in keeping the time frames open-ended**. [Staff: we generally outline timeframes to accomplish the measures to ensure that the objectives are being attainted. We can spread the timeframes out if the Commission does not believe they are actionable, but we recommend setting timeframes to monitor progress implementing the policy]**
3) **H-1b Local Historic Landmarks designations:** *The Policy should indicate WHO is responsible for determining Local Historic Landmark designation, even if the Overview material also explains this. Also,"…* One or more of the following criteria shall be required for a structure or site to be eligible for listing,
   a) [*including* that the structure, or historically significant features of the site, must be at least 50 years old. *(This is important, since without it proponents could seek to list as "historic" locations commemorating potentially momentous but very recent events, with no additional features. There may be other ways to protect such sites, but they shouldn't be subject to historic preservation General Plan policies or Land Use Code designation.)***[Staff: the designation of historic resources actually can be made on structures that are less than 50-years old. This is embedded in the Secretary of Interior's standards, as well as CEQA case law. Staff will not recommend the Council adopt this change.]**

4) H-1d **Design criteria for alterations of and additions to local Historic Landmarks:**

a) *Specify the Review Authority as of 2023! And* "1. Any exterior modifications or alterations, including changes in materials" *Elsewhere in this Element, similar policies specify that this is for modifications that require a building permit. In this case, the threshold is much lower, but is not specified. Presumably, that could include just slightly changing a paint color. (Also, in H-3c for the Plaza.) Let's specify thresholds or provide examples to avoid trivial and expensive review requirements.* **[Staff: the first change is unnecessary and will be dated at the zoning ordinance is updated from time to time. The second change does not have a specific recommendation for modifying the language, but staff notes that this level of detail should be left to the zoning ordinance. The current ordinance specifies this detail.]**

5) **H-7a Cultural Resources Project Review:** As part of the environmental and project review process, all proposed discretionary projects under the California Environmental Quality Act shall be subject to cultural resources sensitivity review by the local area Tribal Historic Preservation Officers (THPOs) …

Under these conditions, ONLY discretionary projects subject to CEQA will be referred to the THPOs for review. With this language, under proposed ministerial approval processes for large new infill housing projects, those projects aren't discretionary, so aren't subject to CEQA review, and so wouldn't be referred to the THPO for Tribes' review. Even if the eventual permit requires work to stop if arch material is unearthed, damage could already be done. If we're proposing some means to determine whether a project meets "objective standards" that would allow for ministerial project approval, we should make sure that those "objective standards specified for streamlined approval of new housing or mixed use projects should include a THPO response to the City's request for THPOs to consider project plans."

[Staff: the City is working directly with the Wiyot Tribe to refine this language. Staff recommends the Commission defer to their judgement as to how their cultural resources are managed and identified through our planning processes.]

Other Issues

1) H2-c and H2-d: Who provides "Design Review" and who is the "Review Authority?"
2) H1-d and H1-e: This policy states that the changes to historic buildings cannot occur without approval from a "Review Authority." :
   - no exterior modifications
   - no additions,
   - no new construction on the site,

   a) Who is this Authority? Further, the need to employ a "cultural resources consultant" to evaluate possible changes is another possible obstacle to modifications. These restrictive regulations and the need to navigate the approval process could discourage changes that may be desirable, such as energy conservation measures, addition of an ADU, or construction of new units through infill, among others. Do we want to be this restrictive? **[Staff: The review authority is identified in our zoning ordinance. It depends on the type of project it is, but most historic resources are reviewed by either the PC or the CC. You can review these at https://www.codepublishing.com/CA/Arcata/#!/LUC/ArcataLUC0970/ArcataLUC0972.html#9.72.040, Without amending CEQA, which holds special process for historic resources, we are obligated to review projects on historic resources with a higher degree of scrutiny. ADU's on historic properties are explicitly excluded form the permissive state law due to this.]**

Editorial Comments

Policy H-1a, 4th line – Delete “and counting”

Policy H-1d and throughout the document in several places – (1) the phrases “review authority” and “design review authority” must be defined (maybe they are, somewhere else in the General Plan), (2) need to be consistently lower or upper case; and (3) referred to consistently as the “review authority,” “Review Authority,” “design review authority” or Design Review Authority.

If the phrase “review authority” is different than “design review authority,” that needs to be clarified and defined.

Policy H-1f – change “HSU” to Cal Poly Humboldt

Policy H-2a – needs reformatting

Policy H-2b - change “HSU” to Cal Poly Humboldt; change “noteworthy” to “potentially historic”

Policy H-2d – should be renumbered as H-2c or moved to appropriate location

Policy H-2c - should be renumbered as H-2d or moved to appropriate location

Policy H-3b – needs reformatting

H2-c and H2-d are reversed.

The AP style guide recommends capitalizing the word Indigenous