

Mads Odom

From: Colin Fiske [REDACTED]
Sent: Sunday, March 10, 2024 3:49 PM
To: Scott Davies; Peter Lehman; Judith Mayer; Dan Tangney; Matthew Simmons; Joel Yodowitz; Abigail Strickland
Cc: David Loya
Subject: Comments for Tuesday, 3/12

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Commissioners,

Please accept the following comments on items on your Tuesday agenda.

Item V.A: 12 & I Street Multifamily Development

This is a good location for dense infill development. The property is zoned for high-density residential and is close to downtown; in fact, it is less than a block from Commercial Central zoned land to both the east and the south. We particularly appreciate the fact that the developer in this case proposes providing an enclosed, secure bike parking space for each unit. This should be a standard feature of all new residential development.

We do need to point out one problem with this project: the staff report refers to "allowable minimum and maximum parking standards" applicable to this project. However, this is incorrect. As of January 9, 2024, [the Humboldt County Association of Governments designated the Arcata Transit Center as a "major transit stop" under AB 2097](#), meaning that no minimum parking mandates can be enforced within a half mile of the transit center. This project is well within that radius, so the city's parking requirements cannot be enforced.

This is important because it appears that, in order to comply with the city's parking mandates, the developer has devoted approximately half of the property to off-street parking and driveways. In other words, without having to provide extra off-street parking, it appears that the project could provide up to twice as much housing. We ask that you clarify to the developer that there are no longer any enforceable minimum parking mandates on this site, and ask that they convert some of the parking area into additional units.

This is a great example of the need for the parking reforms proposed in the General Plan update and the Gateway Area Plan and zoning code, avoiding future confusion by eliminating minimum parking mandates citywide.

Item V.B: DEIR Hearing for General Plan and Gateway Plan & Code

As you know, CRTP strongly supports the General Plan update and the Gateway Area Plan and code. We have provided detailed comments on the DEIR, which you can find [here](#) or in your packet. In general, we believe that both the General Plan update and the Gateway plan and code will reduce future environmental impacts through their focus on infill development and non-automotive transportation, and we urge you to keep this big picture in mind as you review the environmental documents.

Item VI.1: General Plan Wrap-Up

We previously submitted a letter requesting some minor changes to the General Plan, mostly to ensure consistency with new policy directions for parking, congestion management, and bike infrastructure. You can find that letter [here](#) or in your packet.

We greatly appreciate that staff have expressed support for most of our suggested changes in the Decision Tracking spreadsheet. We would like to take this opportunity to again make the case for some of our requested changes that staff have not supported, as follows:

- Many of the requested changes not supported by staff pertain to congestion management, a.k.a. level of service (LOS). As we have discussed previously in some detail, congestion relief projects do not work in the long term - instead, [they lead to more driving, more emissions, more crashes, and more congestion](#). Moreover, to the extent that a congestion relief project works in the short term, its temporary effect is to increase vehicle speeds, which [makes streets more dangerous](#). Thus, policies which support minimizing congestion and vehicular delay are directly contrary to the city's stated transportation safety and sustainability goals. Plus, Arcata has very little congestion to relieve. Despite all of this, staff continue to argue for retaining these contradictory, ineffective congestion relief policies, as well as retaining a list of projects designed primarily for congestion relief. The General Plan is required by state law to be internally consistent, and the policies and projects identified in our letter are not consistent with decisions already made by the Commission to deprioritize congestion relief in the General Plan and instead to prioritize slow speeds, safety, and non-vehicular modes. The inconsistent policies and projects should be edited or removed.
- Staff argue that Class III bike routes - "sharrows" painted on the street - "provide support to a more robust bike system." This is not accurate. There is no evidence that sharrows alone increase bike safety on a street, and [at least one study](#) found that they actually make biking more dangerous. Frankly, sharrows are just an excuse for not providing real bike infrastructure, and as such they have no place in the city's bike plans.

Thanks,
Colin

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Colin Fiske (he/him)
Executive Director
Coalition for Responsible Transportation Priorities
www.transportationpriorities.org

Mads Odom

From: Jenifer Pace [REDACTED]
Sent: Monday, March 11, 2024 6:31 PM
To: Scott Davies; Peter Lehman; Judith Mayer; Dan Tangney; Joel Yodowitz; Matthew Simmons; Abigail Strickland; David Loya
Subject: I Support the General Plan Update & Gateway Area Plan

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Yes and yes.
Sending strong support for Gateway Plan & General Plan updates.
Time is of the essence.

Jenifer Pace
Arcata resident

Mads Odom

From: Alyssa C Lomeli [REDACTED]
Sent: Wednesday, March 13, 2024 11:27 PM
To: David Loya
Subject: Arcata General Plan Draft Public Comment

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To the Community Development Director,

The Arcata General Plan Update discusses both noise impact and biological resource impacts in depth. However, when discussing both impacts, the EIR fails to mention the overlap of how noise can impact animal populations which roost within the building they are looking to reconstruct. Within the noise impact section located on 1.0-15, this section discusses the potential significant impact noise will have on persons within close proximity to the construction, as well as impact on ambient noise levels. What the noise section fails to mention is the adverse effects of noise on wildlife.

Within the biological resources category 1.0-22, the project was shown to have potentially significant impacts on habitat modifications, of either sensitive or special status species. The likelihood for special status bats to roost within the building was high during the breeding months. Pre-construction surveys were determined to only be conducted when a structure is to be demolished, but the deconstruction of parts of the building isn't the only cause of noise pollution. Recurring sounds could impact undetected bats roosting within the building, thus impacting their phases of torpor and or implementing unnecessary stress on the bat. The Arcata General Plan should address the potentially significant impacts of noise on special status species and determine the best ways to mitigate this issue.

My Best,

Alyssa Lomeli

Mads Odom

From: Lisa Pelletier [REDACTED]
Sent: Thursday, March 14, 2024 6:37 AM
To: Meredith Matthews; Kimberley White; Sarah Schaefer; Alex Stillman; Stacy Atkins-Salazar; Karen Diemer; David Loya
Subject: Please be consistent on open space/ wetlands policy in General Plan

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Dear City Councilmembers,

On January 3, 2024, in public comments, Lisa Brown stated that she had sent you a letter with the original language of the General Plan policy from twenty years ago on the diversity of resources concerning their management, including interpretation and recreational use. In her comments, Lisa B said, 'The following language has been added to the end of this policy, "allows for development of open space lands" contrary to the original policy. The added language reads, "Allow for the development of existing vacant and underutilized properties with low natural resource value as a strategy to permanently protect high resource value open space."'

In response to this proposal, Lisa Brown further stated, "I am strongly opposed to this policy addition. This is a departure from past and current directives and policies to preserve and protect our open space lands by utilizing infill development as opposed to resource land development. We do not have to look too hard to see where the City is taking underutilized and damaged resource lands and transformed them into the treasured jewels of our community they are: the Arcata Community Forest, Arcata Marsh, etc."

"One important purpose of the Gateway policies and the proposed General Plan 2045 is to continue to protect Arcata's resource lands. If we begin to pit our natural resource lands against each other for their presumed value, at any given moment in time, we depart radically from the community's strong commitment to protect our natural resource and open space lands both inside and outside of city limits."

I agree with Lisa Brown's comments and I urge you to commit to protecting our natural resource and open space lands in Arcata, as well as outside its boundaries. I also urge you to be consistent in this and please don't make exceptions for developers to exploit wetlands, such as those bordering the Lazy J Mobile Home Park near Mad River Hospital.

Recently, you turned down a proposal for Arcata House Partnership (AHP) to develop open space for a project on Heindon Road because it encroached on open space. At first I was dismayed by your decision but then a council member explained to me that this could open the door to further encroachment on open space lands. So now I support that decision, even though it was a loss for AHP to my regret.

That said, it's important that you stay consistent in this policy and stand firm against any other exceptions. So if you're going to turn AHP down, please don't make other exceptions to this policy, for

instance for Mad River Hospital's plans for expansion. There are vitally important wetlands bordering the Lazy J Mobile Home Park which encompass some of the most fertile agricultural wet lands in Humboldt County. I spoke to Lisa Brown, who previously served on the Open Space Committee, about this and she is strongly in favor of preserving this open space. These are fertile wetlands and wildlife corridors that help with flood control near where I live. Currently, you can see a large "lake" and several ponds in the wetlands bordering our park, which ducks are swimming on. These wetlands have helped to prevent the park from being flooded from recent downpours. A local wildlife biologist has documented numerous species that use these wetlands as a wildlife corridor, and it also aids the elderly in their last years to enjoy the nature surrounding the park, and contributes to their peace of mind.

All we are asking is that you be consistent in adopting policies that protect open space in the General Plan. We're just asking you to be consistent in protecting the open spaces near the Lazy J which helps with flood control, protecting wildlife corridors and which contributes to preserving some of the most fertile land and natural resources, as well as the peace of mind of elderly residents like my 86-year old mother. Please be consistent in preserving the 50% open space in this area (as in the previous General Plan), and don't make exceptions for the sake of developers. That's all we ask and I believe that's a reasonable request. Thank you for your attention.

Lisa Pelletier
Arcata resident