



February 11, 2024

City Councilmembers & Planning Commissioners  
City of Arcata  
736 F Street  
Arcata, CA 95521

*Sent via email*

**RE: December 2023 Draft Gateway Area Plan & General Plan Update**

Dear Councilmembers and Commissioners:

The Coalition for Responsible Transportation Priorities (CRTP) continues to strongly support the Gateway Area Plan and the city's General Plan update, both of which have increased the city's focus on equitable infill development designed to support walking, biking, rolling and public transit as primary modes of transportation. We also support the decision to reorganize some of the policies between the Gateway Plan and the General Plan, resulting in the draft documents published in December 2023. The choice to move many of the policies developed for the draft Gateway Plan into the broader General Plan will enhance the city's efforts to provide safe, sustainable transportation and affordable housing citywide.

As you continue to periodically revisit these latest drafts to make minor revisions, we would like you to consider the following suggestions to further strengthen these documents prior to final adoption. Many of these comments simply reflect needed "clean up" to ensure consistency of newly adopted policies across both documents, but it is nevertheless important to get these details right. We will be submitting comments on the Draft Environmental Impact Report for the documents at a later date.

**Ensure Consistency with New Congestion Policy**

The latest draft documents reflect the recommendations of the Planning Commission and the Transportation Safety Committee to remove congestion management (as measured by vehicular Level of Service, or LOS) as a policy priority.

Proposed General Plan Policy CM-4b now reads in part: "Street projects shall not be designed solely to improve vehicular traffic flow and LOS shall be de-emphasized in street capacity planning and design. If congestion occurs, it shall be managed using alternative methods such as diversion of trips to other travel modes or intersection improvements."

The introduction to the Circulation and Mobility Element also now provides some additional detail and some of the reasoning behind this policy shift: "Deprioritize level of service as a management consideration for City streets, and shift focus to methods of analysis that better measure a project's transportation-related environmental impacts such as Vehicle Miles Traveled. Decades of research and

experience show that projects that attempt to relieve congestion and improve level of service simply attract more traffic and are ultimately unsuccessful at relieving congestion. Furthermore, congestion is often desirable from a safety standpoint, as it results in slower traffic speeds. To that end, the City will use level of service to reduce speeds and encourage mode shift.”

We strongly support this new policy direction and agree with the reasons provided for it. There are, however, a few additional edits required to remove outdated references and old policies and projects that conflict with the new policy by continuing to prioritize congestion reduction:

- The Objective of General Plan Policy CM-4 still contains language that encourages planning that “maintains a level of service that minimizes [automotive] delays.” While this is followed by a disclaimer that LOS “is not a high priority,” it is still inappropriate to include this as a policy objective, given the new policy’s recognition that congestion reduction works against the city’s environmental and safety goals.
- General Plan Policies AC-2c and AQ-2d still proclaim that the city should “minimize the delay and congestion” at intersections and “minimize stopping,” delay and congestion on arterial streets, respectively. These policies are relics of decades past, when there was a belief that minimizing congestion would improve air quality. They also contradict other more sensible policies in the Air Quality element which call for reduced vehicle miles traveled, such as AQ-2a and AQ-2b. With the city now acknowledging the modern consensus that congestion reduction policies actually increase emissions in the long term, the references to congestion and delay in these air quality policies needs to be removed.
- There are still references in the Gateway Plan text to outdated goals such as “reducing corridor congestion” and avoiding “unacceptable” congestion (see p.32 and p.70). These references should be removed.
- Perhaps in response to our previous comments, the latest General Plan draft has removed references to LOS and congestion relief from the table of proposed transportation projects at Table CM-5. However, the projects themselves remain unchanged, with the explanation simply changed to “traffic operation improvements,” which is the same thing under another name. With the city’s policy changing, the purpose of its projects must also change – and not just the wording used to describe them.

### **Ensure Consistency with New Parking Policies**

The latest draft documents also reflect Planning Commission recommendations to remove all minimum parking mandates from the city’s zoning code and make other modern parking management updates.

The updated General Plan Policy CM-6c reads in relevant part: “The City’s should continue to specify maximum parking requirements for new development and eliminate minimum parking requirements.” The Draft Environmental Impact Report for the documents also clearly states that the city will eliminate parking minimums citywide. In implementing this policy, the city is following the lead of academic researchers and other communities nationwide which have documented the many environmental, economic and social costs of forcing developers to provide more parking than needed with their projects.

Additionally, one of the Guiding Principles and Goals of the new Circulation and Mobility Element is to “establish a set of fee-based parking prices that are high enough to drive more active and shared transportation.” This goal is derived from extensive research showing that well-designed parking pricing

strategies can reduce the overall amount of driving (and therefore pollution) and the perceived need for more parking, while at the same time improving parking accessibility.

C RTP strongly supports these important parking reforms, which will reduce sprawl, reduce reliance on automobiles, and increase long-term housing affordability. However, just as with congestion management, some relics of older parking policies remain in the draft plan:

- General Plan Policy LU-1c calls for the city to “reduce or eliminate” minimum parking requirements citywide. It should be updated to just “eliminate,” in order to ensure consistency with Policy CM-6c and the direction of the Planning Commission.
- General Plan Policies CM-6a(2), CM-6a(3), and CM-6d all call for reducing or mitigating the impact of parking minimums. These policies were important in the past, but with all such minimum parking mandates slated for removal, they no longer make sense.
- General Plan Policy CM-6a(1) calls for the city to “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.” This is the only policy to directly implement the goal of “a set of fee-based parking prices.” It should be amended to remove the word “explore” and straightforwardly commit to implementing a smart meter system. (The details of system design can be “explored” at a later date, but the decision to implement a system should be made now.)

### **Plan for Needed Bike and Pedestrian Upgrades**

Both the Planning Commission and the Transportation Safety Committee have discussed at length the need for substantial increases in bicycle and pedestrian safety, comfort and convenience throughout the city.

A particular focus of discussions has been the need to implement Class IV (protected) bikeways on streets with high speeds and/or heavy traffic, as such designs have been shown necessary to encourage people of all ages and abilities to bike. As the new Circulation and Mobility Element states: “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.” However, other sections of the documents still need to be updated to reflect the necessity for Class IV bikeways:

- General Plan Table CM-6 has a new category of projects for “Class IV Facilities,” but no projects are listed (see also Figure CM-f). Many of the projects listed in the table as Class II or Class III should be upgraded to Class IV to increase safety and ensure the facilities will be useful to people of all ages and abilities. We also strongly believe that “Class III Bicycle Routes”—which are nothing more than painted arrows in car lanes—should be removed from the table and not be counted as bicycle improvements, since they do nothing to improve safety or comfort.
- General Plan Policy CM-5a(2) says Class IV facilities should be provided where there is the “highest bicycle demand.” “Bicycle demand,” however, is hard to measure and is not an appropriate indicator of the need for Class IV facilities. Instead, Class IV facilities should be provided where vehicular traffic is fast and/or heavy, creating safety hazards and levels of stress that result in most people refusing to bike. This approach is necessary to ensure a complete network of safe, low-stress bike routes throughout the city.
- The Gateway Plan proposes Class II (unprotected) bike lanes on Samoa Boulevard. This is an example of a location that requires Class IV (protected) facilities to ensure safety and comfort for all users. The text on p.75 should be updated to reflect Class IV facilities as the design concept,

along with any relevant figures. We also request that the Samoa Boulevard design concept be updated to include Pedestrian Hybrid Beacons or full traffic signals (not just high-visibility crosswalks) to ensure the safety of bicycle and pedestrian crossing locations.

We also submit the following suggestions for improvement of other bicycle and pedestrian policies:

- General Plan Policy CM-5c identifies bollards as a type of bike parking. They are not.
- General Plan Policy CM-5d should establish as city policy that all new and re-striped crosswalks should meet high-visibility standards.
- There has been longstanding community interest in pedestrianizing all or part of the Plaza. General Plan Policy D-2a should be updated to explicitly allow for this possibility.
- The Gateway Plan includes the city's first proposed woonerf. General Plan Policy D-2b should be updated to support the expansion of woonerfs to other parts of the city as well.

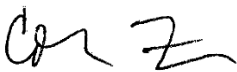
### **Other Issues**

We have also identified the following minor issues in the current draft General Plan:

- Policy CM-4c(2) says that traffic calming measures must be implemented "without compromising emergency access." However, the new Policy CM-1e contains the important caveat that "ease and speed of emergency vehicle access shall be weighed against safe design for all street users," because a wide straight street may end up killing more people through traffic collisions than it saves through emergency access. Policy CM-4c(2) should be updated to reflect this caveat.
- Policy CM-4c(4) creates an impossibly high bar for closing local streets to through traffic. These kinds of closures, known popularly as "slow streets," have proven popular in many communities for their success at improving safety, comfort and neighborhood connections, and should be allowed to be implemented for any reason the City Council sees fit. In fact, Implementation Measure CM-9 calls for considering the implementation of a Slow Streets Program, but this would seem to be in conflict with Policy CM-4c(4) as currently written.
- Policy CM-5e(3) should be updated to reflect the transition from the Northcoast Railroad Authority to the Great Redwood Trail Agency, as well as trail plans and projects already adopted.

Thank you for your consideration of our comments.

Sincerely,



Colin Fiske  
Executive Director  
Coalition for Responsible Transportation Priorities



## Mads Odom

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**From:** Colin Fiske [REDACTED]  
**Sent:** Monday, February 19, 2024 11:36 AM  
**To:** Meredith Matthews; Sarah Schaefer; Stacy Atkins-Salazar; Alex Stillman; Kimberley White  
**Cc:** David Loya; Netra Khatri  
**Subject:** Parking Policy & Sunset Interchange Project  
**Attachments:** Comments on Dec 2023 Gateway & General Plan Drafts.pdf

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Councilmembers,

I am writing on behalf of CRTP to submit comments on two items on your Wednesday agenda: General Plan parking policies and the Sunset Interchange project.

### **General Plan Parking Policies (Item X.A)**

CRTP strongly supports the new parking policies contained in the draft General Plan update, and we ask that you retain these policies, which have already been vetted by staff, the Planning Commission, and other city committees. Per our letter dated February 11th (and attached here for your convenience), we also request that you direct staff to make minor changes to the document to ensure consistency with these new policies.

As a reminder, the main changes to parking policy contained in the draft plan are: (1) eliminate minimum parking mandates for new development citywide; (2) lower maximum parking ratios for new development in specific infill areas; (3) “establish a set of fee-based parking prices that are high enough to drive more active and shared transportation” (i.e., downtown smart meters).

Here are just a few of the reasons to support these policies:

- Forcing new projects to provide more parking than they need makes many projects infeasible and, when projects are still feasible, drives up the cost of new housing and locks in costly and environmentally destructive car dependency. In eliminating minimum parking mandates, the city will be joining a large and fast-growing list of communities nationwide doing the same.
- Excessive off-street parking in infill areas produces an unfriendly pedestrian environment and makes it impossible to generate the density and mixture of uses that are required for meaningful walkability and bikeability and to support high-quality transit. The city already devotes more than 25% of developable downtown land to off-street parking.
- Free, unmanaged public parking in high-demand areas is a significant and inequitable subsidy for driving at the expense of other modes of transportation, and encourages inefficiency and low parking turnover.

### **Sunset Interchange Project (Item XI.A)**

The Sunset Avenue interchange is both one of the most heavily used sets of intersections in the city by people walking, biking and rolling and one of the most unfriendly and hazardous areas for those same people. CRTP appreciates the effort to address the long-standing problems and would like to be able to

wholeheartedly support the project. However, while the project contains many beneficial features, we cannot yet completely endorse it because of a few problems with the current design concept. Specifically:

1. The proposed mixed-use "trail" will cause too many conflicts in this heavily-used area; separate sidewalks and bikeways must be included.
2. Additional measures are required to reduce traffic speeds approaching the roundabouts and encourage yielding to pedestrians - especially blind and low-vision pedestrians who cannot use normal audio cues to predict driver behavior at a roundabout.
3. All of the "slip lanes" - turn lanes that avoid the roundabouts entirely - must be eliminated. Slip lanes encourage turning at unsafe speeds, defeating the safety design of a roundabout, and are notoriously dangerous for people walking and biking.

The "slip lanes" also raise another troubling point related to the project's environmental impact. There is only one reason for such lanes to exist at any intersection, and it is to increase vehicular capacity and speed. Indeed, the city's own documents list one of the purposes of the Sunset Interchange project as "improving traffic operations," which is another way to say increasing capacity or decreasing congestion.

Increased vehicular capacity leads directly to increased vehicle miles traveled (VMT), which is a [CEQA impact](#). Therefore, including the slip lanes not only jeopardizes pedestrian safety, it also jeopardizes the project's ability to qualify for a Categorical Exemption from CEQA.

We ask that you remove slip lanes from the design and make the other modifications identified above prior to approving the project and the CEQA Notice of Exemption.

Thanks for your consideration. Please don't hesitate to contact me with any questions.

Thanks,  
Colin

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

**Mads Odom**

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**From:** Stevie Luther [REDACTED]  
**Sent:** Wednesday, February 21, 2024 12:55 PM  
**To:** Meredith Matthews; Alex Stillman; Sarah Schaefer; Stacy Atkins-Salazar; Kimberley White  
**Cc:** Oona Smith; David Loya  
**Subject:** Comment on Item 10A: Parking Standards in General Plan

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Dear Councilmembers,

The Humboldt County Association of Governments (HCAOG) strongly supports the smart growth principles outlined in Director Loya's staff report on the City's parking standards. Multi-use infill development with higher density allows people to live closer to places they need to go, which makes walking, biking, rolling and buses more attractive and efficient modes of transportation. Additionally, parking management strategies combined with land use development patterns that encourage walkability will support non-vehicular access. HCAOG encourages the City of Arcata to continue with the General Plan policies as proposed including policies to specify maximum parking requirements and eliminate minimum parking requirements.

The Regional Transportation Plan adopted in 2022, *Variety in Rural Options of Mobility (VROOM)*, identifies policies to support regional and state goals to achieve a balanced and sustainable multi-modal transportation network. A new chapter, the Land Use - Transportation Element, was included in this update in order to emphasize the critical connection between development patterns and transportation choices. Relevant policies to the parking discussion include:

POLICY LAND-6. Repurpose for compact, mixed-use development: HCAOG will encourage and support local agencies to pursue opportunities to repurpose antiquated land uses, such as gas stations, parking lots, and large shopping centers, to support compact, mixed-use development and sustainable mobility options. (California Transportation Plan 2050 recommended action)

POLICY LAND-7. Reduce subsidized parking costs: HCAOG advocates for land use policies and projects that curtail the amount and/or cost of tax-subsidized parking in commercial and mixed-use areas. HCAOG will support local agencies in reducing parking minimum and/or enacting parking maximums, and will provide support in identifying funding for and implementing mobility solutions that reduce parking demand. (CTP 2050 recommended action)

Thank you for your consideration and attention to these critical issues!

Best,

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***Stephen Luther***

Associate Regional Planner

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