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**Cc:** [David Loya](#)  
**Subject:** Local Coastal Element  
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Commissioners,

CRTP appreciates the fact that the city's new draft Local Coastal Element includes policies to promote public transportation as well as trails and active transportation as means of ensuring equitable access to coastal areas.

There has been an unfortunate history of local coastal plans focusing solely on parking as a measure of coastal access, despite the fact that low-income Californians are much less likely to own or drive a car - and despite overwhelming evidence that abundant free parking reinforces and perpetuates car dependency, and requiring parking in new development actively undermines transit, biking, walking and every other mode of transportation.

Unfortunately, there is a continued - and in our view unwarranted - emphasis on parking found in Policy 4.1.9, which explicitly calls for new free parking at coastal access points. We strongly encourage the city to amend this policy so that it commits to improving equitable coastal access without calling out parking as the only means to do it.

Similarly, Policy 9.2.12 still calls for new development to provide parking "to the extent necessary to adequately serve the development and ensure that the development does not adversely impact public access to the coast." But we know that there is no scientific way to determine "adequate" parking, and that driving is not the only way to access the coast. Furthermore, the new General Plan Policy LU-1c requires the city to "eliminate minimum parking requirements citywide," and Policy 9.2.12 would conflict with this new citywide policy. We request that Policy 9.2.12 be removed, or edited to reflect a broader focus on equitable and sustainable transportation options.

It is also important to note that the Humboldt County Association of Governments has designated the Arcata Transit Center (as well as Cal Poly Library Circle and the Valley West Blvd stop) as a "major transit stop" under AB 2097, which means that parking requirements cannot be enforced on any development within 1/2 mile of the stop. Much of the developable area in the coastal zone is within this 1/2 mile radius where parking mandates cannot be enforced. Acknowledgement of AB 2097 and its effects should be clearly stated in Arcata's Local Coastal Element, as the City of Eureka has done in the drafting of its new [Waterfront Eureka Plan](#) (see Policy E under "Development Standards").

Thanks for your consideration of our comments.

Colin

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