

From: [Colin Fiske](#)
To: [David Loya](#)
Subject: Re: Local Coastal Element
Date: Monday, April 28, 2025 11:26:28 AM

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External sender <colin.fiske@gmail.com>

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Hi David,

Thanks for the opportunity to comment on these documents. I took a first pass through the Coastal Zoning Ordinance, and have a few comments. In general, I am a little bit concerned about the subjectivity of some of the standards for CDPs, although I don't know if form-based codes play well with the Coastal Act - perhaps something to research. I also still have some hesitation about the approach to permitting development in the SLR zones, but we've been over that issue before, so I won't re-hash it.

Here are a few specific comments:

- 2.12.050.B - The language should be updated to reflect the fact that there will not be parking minimums (but may be maximums), and hopefully to refer to other options for coastal access per our previous discussions.
- 2.26.030.B - It would be great to see options for improving public access via bike parking, bike and pedestrian paths, and transit stops, not just parking.
- 2.26.040.B - I appreciate the inclusion of bike parking as well as car parking, but does this need to focus on parking at all? Can it be reframed to focus more generally on ability to access coastal access points - e.g., with bike/ped infrastructure, transit, etc., as options in addition to parking?
- 2.26.040.H - I very much appreciate the emphasis on universal design. However, I would note that blindness and various vision limitations are common physical disabilities, so it might be wise to qualify "visual access for physically disabled persons" and add some language about access for people with vision disabilities.

Thanks,
Colin

On Wed, Apr 23, 2025 at 8:59 AM David Loya <dloya@cityofarcata.org> wrote:

FYI, I forgot to update the policy with this latest language. I told the Commission I'd be making the change. Thank you for your collaboration!

David Loya (him)

Community Development Director

City of Arcata

p. 707-825-2045

c. 707-834-5013

I acknowledge my residence in Goudi'ni (Arcata), part of the ancestral territory of the Wiyot peoples. I offer my reconciliation and respect to their elders past and present.

<https://www.wiyot.us/162/Wiyot-Placename-Video>

From: Colin Fiske <colin.fiske@gmail.com>

Sent: Friday, April 18, 2025 10:19 AM

To: David Loya <dloya@cityofarcata.org>

Subject: Re: Local Coastal Element

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Thanks, David! I'll review as soon as I get a chance.

On Thu, Apr 17, 2025 at 9:49 AM David Loya <dloya@cityofarcata.org> wrote:

Hey Colin,

The updated LCE and the Coastal Zoning will be on the next PC agenda. They will also be [on our website](#) by EOB tomorrow.

David Loya (him)

Community Development Director

City of Arcata

p. 707-825-2045

c. 707-834-5013

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From: Colin Fiske <colin.fiske@gmail.com>

Sent: Friday, April 11, 2025 5:06 PM

To: David Loya <dloya@cityofarcata.org>

Subject: Re: Local Coastal Element

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Thanks, David! 9.2.12 looks great to me. For 4.1.9, could we insert a sentence in the middle that says something like: "Coastal access is also available for pedestrians, bicyclists, and transit users, but these facilities have not received the same historical investment as vehicle parking."

On Wed, Apr 9, 2025 at 2:40 PM David Loya <dloya@cityofarcata.org> wrote:

Colin, feel free to weigh in on these edits. Again, I appreciate your careful review. These policies were written years ago with the input from then CCC staff. A lot has changed.

4.1.9 Visitor Parking. Free and low-cost visitor parking is provided within the Coastal Zone to accommodate visitors at coastal access points. The City shall provide equitable access to the coastal recreational areas that include a range of mobility options.

9.2.12 Parking. New development shall not significantly adversely impact public access to the coast. Parking maximums shall be established to ensure coastal resources are most effectively and efficiently protected.

Cheers,

David Loya (him)

Community Development Director

City of Arcata

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<https://www.wiyot.us/162/Wiyot-Placename-Video>

From: Colin Fiske <colin.fiske@gmail.com>

Sent: Monday, March 24, 2025 2:24 PM

To: Scott Davies <sdavies@cityofarcata.org>; Dan Tangney <dtangney@cityofarcata.org>; Matthew Simmons <msimmons@cityofarcata.org>; Abigail Strickland <astrickland@cityofarcata.org>; Ashton Hamm <ahamm@cityofarcata.org>; Peter Lehman <plehman@cityofarcata.org>; Amanda Hickey <ahickey@cityofarcata.org>

Cc: David Loya <dloya@cityofarcata.org>

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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Colin Fiske (he/him)

Executive Director

Coalition for Responsible Transportation Priorities

www.transportationpriorities.org

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Executive Director

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