



December 13, 2021

Mayor Stacy Atkins-Salazar
City Councilmembers
Planning Commission Members
Community Development Director David Loya
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RE: Initial Comments on Draft Gateway Area Plan

Dear Mayor Atkins-Salazar, Vice-Mayor Goldstein, City Councilmembers, Planning Commission Members, and Director Loya:

The Coalition for Responsible Transportation Priorities (CRTP) appreciates the opportunity to offer these initial comments on the draft Gateway Area Plan (“plan”). This plan, as it currently stands, is clearly the most bike and pedestrian friendly land use plan ever proposed in our region. Because so many of our environmental impacts stem from transportation, and because the plan’s proposed densities will allow much-needed housing development to occur without encroachment into the natural environments surrounding the city, we believe it is also the most environmentally friendly land use plan ever proposed in our region. **We strongly support this plan, and we encourage you to do the same.**

That said, this is a draft plan, and the city is soliciting public input on how to improve it. In that spirit, we offer some specific comments below. All section numbers and other references in these comments refer to the draft plan, unless otherwise specified.

Community Benefits

The plan is structured as a set of regulations and standards alongside a set of incentives tied to the provision of community benefits. The relationship between standards and incentives is a dynamic and difficult balance to strike. As time passes, many of the community benefits initially eligible for the incentive program are likely to become required standards at either the state or local level, and ideas of community benefits will evolve. Therefore, we recommend building into

the plan a regular schedule for revisiting the incentive plan and specifically the list of eligible community benefits, so that newly required standards are removed from the list of benefits eligible for the incentive program, and new benefits are added as appropriate. We further add the following specific comments:

- Policy GA-7j (p.69) lists a number of active transportation and transit amenities which will be incentivized. We suggest adding carshare, bikeshare, and bus passes for employees (not just residents) to this list. Additionally, we note that some of the items on the current list—including electric vehicle charging stations and on-site bike parking—are or soon will be required by state or local codes, and thus should not be considered amenities eligible for the incentive program.
- Policy GA-2d (p.50) suggests that developers will be free to choose which benefits to provide in order to meet the requirements to receive incentives. We suggest that the City may wish to place some restrictions on this free choice, such that, for example, the developer must choose a minimum number of benefits from each category (transportation, housing, arts, etc.).
- Policy GA-11k (p.103) suggests that the plan will incentivize electric-only construction. However, the City is currently developing regulations to require electric-only construction, so this is not a relevant incentive target.

Active Transportation

As noted above, the design for active transportation in the plan is generally excellent. We offer the following notes in an effort to provide context and to strengthen those designs even further:

- CRTP generally does not support new one-way multi-lane couplets. However, we do support the proposed one-way couplets in the plan, because they are single-lane and designed to maximize comfort and safety for people walking, biking and rolling.
- We suggest the following additions and modifications to Guiding Principle 5 (p.30):
 - The existing rail-trail project is and will be used not just for recreation, but for commuting as well. We encourage the City to explicitly recognize the importance of commuting via trail in its discussion of expanded perpendicular connections. This comment also applies to Policy GA-6d, and to the discussion of uses for linear parks at Policy GA-6c (p.61).
 - We encourage inclusion of language that supports giving bikes and pedestrians the right-of-way at key intersections, particularly those where major trails cross streets. This will help address the barrier to bike and pedestrian circulation posed most notably by 11th Street and Samoa Boulevard (see Figure 9).
 - Local adverse effects of traffic are noted, including noise and congestion. This list should also include injury and death, odors, pulmonary and cardiovascular impacts, and water quality impacts.
 - A goal is described of reducing vehicle trips and parking demand by providing alternatives. However, it should be noted that demand for parking and vehicle trips is strongly influenced by supply, so that reducing parking and other

vehicular infrastructure is necessary to significantly reduce demand. We also encourage the City to incorporate this principle of induced demand into Policy GA-7a (p.67).

- The plan calls for 6-foot minimum sidewalk widths (p.64, as well as Policy GA-7b(a) [p.67]). However, a pedestrian-friendly streetscape requires a *clear path* of at least 6 feet, with additional width provided for frontage zones, outdoor seating, street furniture, and other uses, including those enumerated in Policy GA-8c (p.93).
- We encourage planning for the provision of Class IV bicycle facilities on 11th Street (see Figure 9). Continuation of current “Class III” status will not provide anywhere near the level of comfort and safety envisioned and desired for the rest of the area.
- Class IV bike facilities are needed on any streets which have or are anticipated to have fast or heavy traffic flows. We appreciate Policy GA-7b(e) (p.67), which allows for Class II facilities to be upgraded to Class IV facilities as needed. However, we encourage planning for Class IV facilities from the outset on K, L, 8th and 9th Streets, even if it requires removing some on-street parking.
- We strongly support the woonerf concept planned for the block of 6th Street between K and L Streets, and encourage the City to expand this concept to other streets in the Gateway Area.
- Policy GA-7b(i) (p.68) allows for the future conversion of one of the proposed multi-use trails into a street for vehicles. We think this policy unnecessarily weakens the proposed active transportation network, and we encourage the City to remove it.
- We encourage the City to include provisions for multi-use trails with separated walking and biking lanes in Policy GA-7b (p.67). As these trails get heavier use from both commuters and recreational users, separation will increase convenience and minimize conflicts.
- Policy GA-7i (p.68) calls for a “no net loss” standard for linear feet of Class I trails. We do not believe that this the most appropriate standard, since the utility of trails is not directly related to their length. Instead, we propose that if any Class I trails are proposed to be moved or removed, the applicant should have to demonstrate an improvement in active transportation access and connectivity from the change.
- Representative cross-sections of L Street provided on p.76 show sidewalks on only one side of the street (see also Design A on p.72). While we recognize the importance of preserving greenery, it is imperative for a pedestrian-oriented area that there are adequate sidewalks on both sides of all streets. On the other hand, we do not believe that turn lanes or turn pockets are required here.

Vehicular Infrastructure

We strongly support the plan’s focus on active transportation and transit and its de-emphasis of vehicular transportation. We offer the following comments to further strengthen this aspect of the plan:

- Table 3 (p.25) does not indicate that a circulation system that minimizes vehicle trips will help address the challenges of climate change and sustainability. In fact, this is one of the primary benefits of such a system, and it should be recognized as such.
- We strongly support Policy GA-7c (p.68). However, we encourage the City to also include here (and throughout the plan) provisions for car-sharing programs which reduce personal car ownership.
- Policies GA-7e and GA-7f (p.68) call for the provision of “ample on-street parking.” We recognize that this is an attempt to reduce the provision of off-street parking, and we support this goal. However, we also encourage the City to provide for the possibility of eliminating on-street parking in some areas in order to add bicycle and pedestrian infrastructure, narrow the right-of-way, increase visibility, and decrease pedestrian crossing distance. Figures 10-k and 10-l, based on these policies, show wide, vehicle-dominated rights-of-way which are not conducive to pedestrian use.
- Representative street cross-sections in the plan show mostly 12-foot vehicular travel lanes. We encourage these widths to be reduced to 10 feet to slow traffic, reduce pedestrian crossing distance, and provide space for wider sidewalks and/or buffered bicycle facilities.
- Policy GA-9q (p.98) calls for locating parking lots behind buildings “when feasible.” Street-facing parking lots are incompatible with a pedestrian environment and can always be avoided with good design, so we encourage the elimination of the “when feasible” caveat.

Land Use and Design Standards

We strongly support the plan’s emphasis on dense housing development mixed with an appropriate amount of non-residential uses. We offer the following comments in an attempt to strengthen this focus even further:

- Image 2 (p.50) notes that the zoning code may require setbacks. We encourage the City to endorse “build-to lines” instead of setbacks in the Plan Area, which would help accomplish many of the plan’s goals, such as those expressed in Policies GA-9i and GA-9k (p.97) and would likely obviate the need for Policy GA-9n (p.97).
- Guiding Principle 3 (p.28) identifies K and 11th Streets as “key gateway segments.” We believe that Samoa Boulevard should be included in the list as well.
- Policy GA-1b (p.46) lists examples of incompatible land uses which will not be allowed in the Gateway Area. We suggest amending this list to include businesses with drive-through service, as well as any primarily vehicle-serving uses (e.g., gas stations, car washes, etc.).
- Table 7 (p.49) indicates that there will be a minimum height requirement of 2 stories in the Gateway Area. We suggest increasing this to 3 stories to ensure the densities required to support a truly walkable area. Table 7 also shows that the “Barrel District” is intended to be denser than the “Gateway Hub.” We suggest that the higher densities allowed in the

“Barrel District” also or instead be allowed in the “Gateway Hub,” which is geographically and symbolically the heart of the Area (see below).

- Policy GA-4a (p.54) lists allowable non-residential uses. However, it leaves out several uses mentioned elsewhere in the plan, such as light industrial (see for example p.21: “the plan area will also need to see growth in...light-industrial jobs”). We encourage Policy GA-4a to include light industrial and any other compatible non-residential uses.

Other Environmental Issues

As noted above, we believe this plan is the most environmentally friendly land use plan ever proposed in Humboldt County. We offer the following comments in the spirit of improving its environmental benefits even further:

- The plan proposes its densest development standards in the “Barrel District” at the southern edge of the Plan Area. While this area is not at immediate risk from sea level rise, it is more at risk than more central parts of the Plan Area. The City may wish to consider instead focusing densification on the “Gateway Hub” or other areas further from the Bay.
- We suggest that the plan include explicit reference to the Regional Climate Action Plan under development and describe its coordination and compatibility with that document.
- Table 6 (p.48) lists LEED certification as a potential community benefit type, but does not specify what level of certification will be considered sufficient. We suggest specifying the highest feasible level of certification.
- We strongly support the requirement for pedestrian-scale lighting found at Policy GA-8j (p.93). We suggest specifying that such lighting be dark-sky compliant.

Equity

We strongly support the plan’s emphasis on equity, and we encourage the City to add more specific details about how it will ensure that development in the Plan Area is equitable. For example, the plan suggests that the City will incentivize affordable housing, but incentives do not guarantee that developers will choose to build affordable housing (see for example p.31). Additionally, Guiding Principle 2 lays out admirable aspirations, but does not address the main root causes of inequitable development, such as historical and ongoing structural racism and other biases in the financial system. We recognize that these topics are likely outside the scope of the plan, but we encourage the City to at least acknowledge them and begin to think creatively about solutions. We further offer the following comments:

- Policy GA-31 (p.53) acknowledges that some residents may be displaced by development in the Plan Area. Implementation Measure Imp-GA-3.2 requires developers to provide assistance with relocation of displaced residents. We encourage the City to: (a) include explicit policies to reduce displacement, particularly of low-income residents; (b) ensure

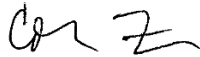
that Imp-GA-3.2 goes above and beyond the requirements of the California Relocation Assistance Act.

- Policies GA-6e and GA-6h (p.62) both propose the creation of privately-owned public spaces. While we recognize the City's need to limit future unfunded maintenance costs, we cannot endorse privately-owned public spaces due to the potential for future conflicts over First Amendment rights and related issues which have arisen in such spaces in other communities. We encourage the City to require that such spaces be conveyed to public ownership with an agreement for the developer to provide maintenance services.
- We encourage the City to collaborate with the Wiyot Tribe to identify Wiyot-language place names for parks, open spaces, and other new features of the Plan Area. We also suggest renaming the "Barrel District" and perhaps the "Gateway Area" itself with Wiyot names.

Again, CRTP strongly supports this plan, and will continue to do so. We offer these comments in the hope that it can be strengthened even further. We also note that implementation of this plan will be challenging and will be influenced by economic, environmental and cultural factors outside of the City's control. Nevertheless, we encourage the City to vigorously pursue implementation of the plan and to work proactively to take on challenges. We look forward to working with the City to make it happen.

Thank you for your consideration.

Sincerely,



Colin Fiske

Executive Director

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