



March 4, 2022

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via email: dloya@cityofarcata.org

RE: Notice of Preparation of a Draft Environmental Impact Report for Arcata General Plan 2045 and Gateway Area Plan

Director Loya:

Thank you for the opportunity to respond to the Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for the Arcata General Plan 2045 and Gateway Area Plan. As you know, we are in strong support of the Gateway Area Plan, and we look forward to supporting various improvements in the broader General Plan update as well. However, we do believe that there are a number of issues critical to both the success of the plans and their environmental impacts which must be fully addressed in the EIR prior to plan adoption. Therefore, and pursuant to the procedures of the California Environmental Quality Act (CEQA), this letter offers comments on the potential scope and contents of the future EIR.

We request full consideration of the following topics, and answers to the following questions, in the EIR:

- **Climate crisis.** How will the General Plan and Gateway Area Plan affect local greenhouse gas (GHG) emission levels? If Arcata's population is projected to increase, which we understand to be the case, how will the plans affect the *per capita* GHG emissions of current and future residents?
- **Sea level rise.** When will rising sea levels and attendant flooding affect areas within the City limits, and particularly the Gateway area, under a variety of assumptions reflecting the reasonable range of possible future conditions? How will the General Plan and the Gateway Area Plan address these risks through shoreline defense, managed retreat, and/or patterns of future development?
- **Consistency with other local plans.** The City of Arcata falls under the jurisdiction of the Regional Transportation Plan 2022-2042 (also called "VROOM: Variety in Rural Options of Mobility") prepared by the Humboldt County Association of Governments and the Comprehensive Action Plan for Energy 2019 Update (also called "RePower Humboldt") prepared by the Redwood Coast Energy Authority. How will the General Plan and the Gateway Area Plan ensure consistency with these plans and progress toward their various goals and targets, including but not limited to the Regional Transportation Plan's Safe and Sustainable Transportation Targets?
- **Environmental justice and equity.** Many areas of Arcata have household incomes less than 80% of the statewide median income, and at least some of these areas are likely disproportionately burdened by pollution due to their locations relative to highways and legacy pollution sources. Therefore, we believe that Arcata is required to incorporate an Environmental Justice Element into its General Plan pursuant to SB 1000. What impacts will the General Plan and the Gateway Area Plan have on disadvantaged communities' pollution exposure, physical activity/road safety, public facilities, housing and population, access to safe and affordable housing, and other aspects covered by both SB 1000 and CEQA?
- **Wastewater treatment.** How will the General Plan and the Gateway Area Plan affect the City's current wastewater treatment system and future plans for adapting, upgrading, and/or relocating wastewater treatment facilities? How will the plans affect the water quality of effluent from the City's wastewater treatment facilities and of stormwater runoff into Humboldt Bay and other local bodies of water?
- **Seismic activity and soil liquefaction.** How will the General Plan and the Gateway Area Plan affect risks to local life and safety, as well as environmental risks, from seismic activity and attendant soil liquefaction?
- **Transportation safety.** How will the General Plan and the Gateway Area Plan affect the risk of injury and death for users of the City's transportation system, particularly its most vulnerable users - those walking, biking or rolling on local streets and roads?
- **Vehicle miles traveled.** How will the General Plan and Gateway Area Plan affect local vehicle miles traveled (VMT)? If Arcata's population is projected to increase, which we understand to be the case, how will the plans affect the *per capita* VMT emissions of current and future residents?
- **Wild and working lands.** How will the General Plan and the Gateway Area Plan affect wild and working lands, including forests, farmlands, wetlands and riparian areas, both

within City limits and outside of them? In particular, how will the plans affect conversion and/or protection of these lands?

- **Green building.** How will the General Plan and the Gateway Area Plan affect the energy use of local buildings and the GHG emissions from those buildings? How will the plans affect the amount of distributed generation of electricity from installations on or around local buildings and address any reduction in such generation from, for example, shading of existing solar panels?

Thank you for your consideration.

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