



April 19, 2022

Mayor Stacy Atkins-Salazar
City Councilmembers
Planning Commission Members
Community Development Director David Loya
736 F Street
Arcata, CA 95521

via email: satkinssalazar@cityofarcata.org; sschaefer@cityofarcata.org;
mmatthews@cityofarcata.org; bwatson@cityofarcata.org;
dloya@cityofarcata.org

Dear Mayor, Councilmembers, Planning Commissioners, and Staff:

On behalf of the Coalition for Responsible Transportation Priorities (CRTP), the Environmental Protection Information Center (EPIC), the Northcoast Environmental Center (NEC), the Redwood Coalition for Climate and Environmental Responsibility (RCCER), and Humboldt Baykeeper, we write to discuss the process of developing and reviewing the Gateway Area Plan. We are impressed with the extensive and thoughtful public process conducted by City staff to date, from the early public visioning sessions on which the draft Plan is based, to the current slew of public meetings and outreach efforts.

We are particularly supportive of staff's efforts to engage people and communities whose input is often lacking in planning processes, such as by holding "we'll come to you" meetings with neighbors and community groups and conducting focused outreach to Arcata's student

population and to residents who speak Spanish at home. Active outreach of this kind is necessary to ensure equitable and broadly representative public participation, but is unfortunately not typical of local planning processes. Indeed, the Gateway Area Plan public engagement process to date has been the best we've seen in many years.

We write to caution that process can often affect policy. The Planning Commission has indicated that it would like to conduct a line-by-line review of the draft plan. While we appreciate that the specificity required of a form-based code necessitates robust engagement by the Planning Commission, we also appreciate that such extensive public review can distort both the perceived public reception of the plan as well as threaten the planning process through "paralysis by analysis."

Due to a variety of economic and social factors, people who attend public meetings of bodies such as the Planning Commission and the City Council are disproportionately white, wealthy, and home-owning. It would be easy for decision-makers to assume that these people are representative of "the public" or "the community," and indeed people sometimes claim such a broad mandate in their comments. But this would be an error. Most often, the perspectives of people of color, low-income people, renters, and parents of young children are largely missing from these venues. This problem is only exacerbated when a public process stretches out over a long series of such meetings. For people who find it difficult to participate in a single public meeting, participation in a large number of them is often impossible.

The Planning Commission and City Council should also be considerate of the need to complete plan development in a timely manner. Adoption of a high-density infill Gateway Plan is both explicitly required by the City's adopted 6th Cycle Housing Element Implementation Measures 12 and 20, and is essential to support many of the Housing Element's other policies and implementation measures as well. Further, state law requires the City not only to zone for sufficient housing production, but to ensure the reasonableness of projections of actual housing production necessary to meet its Regional Housing Needs Allocation (RHNA). Any unreasonable or unnecessary delay in adopting an adequate Gateway Area Plan, and consequent delay in actual housing production, could place the City in legal jeopardy. Therefore, we urge the City to ensure a timely process for adoption of the Plan.

For these reasons, we ask that the Planning Commission and City Council consider how to appropriately balance public engagement and planning processes to both ensure fairness in engagement opportunities as well as creating an effective mechanism to consider the plan itself. We believe that this balance is best achieved through a review process with a relatively small and predetermined number of meetings, focusing on important concepts rather than line-by-line review, with more discretion afforded to planning staff to accomplish the goals outlined by the Planning Commission and City Council. We further request that the Council direct staff to continue with their active outreach efforts during this process, and ensure that they have the resources to do so.

Thank you for your consideration of our comments.

Sincerely,

Colin Fiske, Executive Director
Coalition for Responsible Transportation Priorities
145 G Street, Suite A
Arcata, CA 95521
colin@transportationpriorities.org

Tom Wheeler, Executive Director
Environmental Protection Information Center (EPIC)
145 G Street, Suite A
Arcata, CA 95521
tom@wildcalifornia.org

Caroline Griffith, Executive Director
Northcoast Environmental Center
415 I Street
Arcata, CA 95518
director@yournec.org

Jennifer Kalt, Director
Humboldt Baykeeper
600 F Street, Suite 3 #810
Arcata, CA 95521
jkalt@humboldtbykeeper.org

Matthew Simmons, Co-Director
Redwood Coalition for Climate and Environmental Responsibility
rccer@protonmail.com