



July 3, 2023

Cristin Kenyon
Development Services Director
City of Eureka
531 K Street
Eureka, CA 95501

via email: ckenyon@eurekaca.gov

RE: Comments on Draft Waterfront Specific Plan & Coastal Land Use Plan

Dear Director Kenyon:

The Coalition for Responsible Transportation Priorities (CRTP) broadly supports the vision for future development laid out in the draft Waterfront Specific Plan, a.k.a. Waterfront Eureka Plan (WEP), and the draft Coastal Land Use Plan (LUP), including the “preferred futures” described in WEP Chapter 4, and especially both plans’ increased focus on active transportation, transit, and denser mixed-use development. However, there are some areas of the plans which we believe could and should be improved. We are commenting on both the WEP and the LUP together in this letter due to the highly interrelated nature of the two plans.

Parking

Both plans acknowledge that minimum parking mandates and excessive car parking generally present barriers to new development and work against the city’s goals of walkable, pedestrian-oriented development. Despite this, the draft plans do not clearly and unambiguously call for the repeal of these mandates, but rather provide somewhat mixed messages. For example, Goal WEP-1.4 and LUP Policy LUD-2.1.d call for “reducing or eliminating parking requirements,” WEP Implementation Action 1.4b calls for reducing parking mandates and allowing limited “exemptions,” LUP Policy PAR-4.11 calls for “context-based flexibility in parking requirements,” LUP Policy PAR-4.12 calls for continuing the city’s “parking in-lieu fee program,” LUP Policy PAR-4.15 calls for ensuring that parking mandates don’t result in undesirable development, and LUP Policy PAR-4.16 calls for not “requiring more parking than can adequately be provided on site.”

All of these proposed goals, policies and actions attempt to soften or mitigate the negative impacts of minimum parking mandates. This is an important step, but not sufficient to the scope of the problem. Given the city’s acknowledgement of the many economic, environmental and social costs of these mandates, and the well-documented fact that there is no scientific basis for them, we request that the city eliminate minimum parking mandates altogether.

It appears that the reluctance to eliminate parking minimums may come from two fundamental misconceptions related to parking: first, that there is a fixed demand for car parking; second, that car parking at or near a destination is equivalent to access to that destination.

On the first subject, research in recent decades has thoroughly debunked the notion that there is a fixed demand for parking. Rather, driving (and therefore parking) varies widely according to the price of parking, the surrounding development patterns, the availability of other modes of transportation, and other factors. Additionally, the availability of parking itself affects both car ownership and driving. Recent studies have demonstrated conclusively that the availability of free parking actually causes more driving. Therefore, providing free parking on the basis of an assumption of fixed demand (i.e., an assumption that people will drive no matter what) is a clear case of the tail wagging the dog. Furthermore, given the fact that state models indicate a significant reduction in driving is needed in order to meet climate targets, inducing more driving by providing free parking is counterproductive in the extreme.

The discussions of parking on WEP p.65 and LUP p.3-24, as well as LUP Policy PAR-4.11, should include a brief summary of this phenomenon of parking-induced demand for the benefit of readers and decision-makers. More critically, goals, policies and actions in both plans should be adjusted to reflect this reality:

- Goal WEP-3.2 should be amended to remove consideration of expanded parking in “high demand areas.”
- WEP Implementation Action 1.4a should require unbundled parking, rather than only encouraging it.
- WEP Implementation Action 3.2d should clearly commit to implementing a smart meter program to manage parking and driving demand, rather than simply “exploring” it.
- WEP Implementation Action 3.2f should be removed. Adding capacity through a parking structure (or any significant new parking) when occupancy is high will not solve the capacity problem due to the phenomenon of induced demand. Instead, high occupancy is a sign that prices are too low and/or more support for alternative modes of transportation is needed.
- We oppose the creation of a Parking District (see WEP p.107) if the purpose is to construct new parking facilities. Revenue from parking should be directed to support public transit and/or bike and pedestrian amenities.

Next, equating parking with access is wrong, perpetuating an unsustainable system of automobile dependency and the inequities baked into it. Access is about getting people—not vehicles—where they need to go, and there are many ways people can get around. Furthermore, national studies and local survey data show that low-income people and people of color are much more likely to lack reliable access to a vehicle, and these people deserve coastal access (and access to other destinations) as much as anyone else. The following aspects of the plans should be amended to more fairly and accurately address the topic of access:

- LUP Policy PAR-1.10 should be overhauled to require maintenance of shoreline access, not shoreline parking. A requirement to maintain parking can actually reduce shoreline access, both by making it harder to get to the shoreline by foot, bike or transit, and by

preventing the development of affordable housing units close to the shoreline.

Furthermore, requiring parking to be free while not simultaneously requiring free bus passes and free micromobility devices amounts to an inequitable subsidy for the form of transportation most likely to be used by wealthier residents.

- LUP Policy PAR-4.11 should be amended to remove the equation of parking with public shoreline access.
- Throughout the plans, there is repeated discussion of “park once” strategies for visitors. We support “park once” strategies for visitors arriving by car. However, these discussions must also address the fact that people also arrive in the area by transit, by foot, by bike, and using other devices, and these other modes should be both acknowledged and encouraged in planning efforts.

Failure to reform the outdated treatment of parking in both plans as we have outlined will perpetuate social inequities and work against the urgent need to reduce carbon emissions and reduce future climate impacts, including sea level rise.

Bike & Pedestrian Improvements

We support the proposed woonerfs, sidewalk and bike improvements outlined in WEP Figures 5-2 and 5-3 and WEP Implementation Actions 4.1b and 4.1c. However, we do not understand the meaning of the improvement described as “Class I bike lane crossing Waterfront Drive near O Street,” and request further clarification.

Additionally, LUP Policy PAR-4.4 should be amended to specify that facilities must serve bicyclists of all ages and abilities, and to acknowledge that the existing network is insufficient in this regard. The importance of this acknowledgement can be seen in the bike improvements shown in Figures LUP 3-7 and 3-8, which depict unprotected (Class II) bike lanes on busy streets. To serve users of all ages and abilities, new bike lanes on Highway 101 and other busy streets should be protected (Class IV), and existing facilities on streets such as Wabash and F should be upgraded to Class IV as well.

We submit the following additional comments on bike and pedestrian infrastructure policies:

- At least one long-term bike parking space should be required for every bed in new residential construction (one for every 3 units is not sufficient; see WEP Table 6-3). Long-term bike parking spaces should also be required for office/employment uses. Additionally, it is unwise to tie bike parking requirements to car parking requirements, as they are extremely different in nature (car parking takes up much more space and is much more expensive), and the city should be discouraging excessive car parking while encouraging abundant bike parking.
- LUP Goal PAR-4 and its associated policies should be amended to explicitly acknowledge and reflect both the city’s adopted Complete Streets Policy and the bike and pedestrian mode share targets in the adopted Regional Transportation Plan.
- The discussion of “pedestrian access and safety” on WEP p.65 should include not only explicitly pedestrian-serving infrastructure, but also traffic calming generally, due to the critical role of vehicle speeds in pedestrian-involved collisions.

- LUP Policy PAR-1.8 should be amended to replace “North Coast Railroad Authority” with “Great Redwood Trail Agency,” and to add the planned extension of the coastal trail system from southern Eureka to College of the Redwoods to the list of future projects.

Public Transit

Public transit is a key mode of access to Eureka’s coastal zone and to the WEP plan area specifically, and will only become more important with the construction of the multimodal EaRTH Center in the near future. It is critical that the WEP Mobility Plan acknowledge the EaRTH Center plans and the important role of transit in the local mobility system more generally.

Land Use, Density and Intensity

We generally support higher densities and intensities of land uses to support walkability, bikeability and high quality transit, particularly in the Old Town and Commercial Bayfront West districts and other parts of the city’s “Core Area” not subject to a high risk of inundation or other natural hazards during the planning period. Specifically:

- We question the need for maximum intensity (FAR) and density (du/acre) standards generally. The city itself acknowledges the desirability of greater density and intensity, yet sets maximum standards which discourage it. For example, LUP Policy LUD-2.2 calls for encouraging development at the maximum allowable intensity in the Core Area, which implies that the “maximum” should not actually be a maximum but a target. If maximum intensity and density standards are retained, then additional and more stringent minimum standards should also be adopted. See also comments below.
- The maximum density for the High-Density Residential district should be far above the currently proposed 44 du/acre. The Linc Housing projects currently approved by the city demonstrate clearly that much higher densities (in this case, 80-120 du/acre) are feasible and will help the city meet its housing and transportation targets. The High-Density Residential district should also include a minimum density standard.
- The minimum FAR should be greater than 1.0 in Old Town (see WEP Tables 5-2 and 6-2). This is a district where buildings generally should be built to lot lines, and single story buildings are not appropriate or dense enough to support walkability.
- Maximum heights and intensities should generally be increased in the Old Town and Library districts (see WEP Table 6-2).
- WEP Development Standard A.1 should not include any setback requirements below the 5th story. The 3rd story setbacks proposed will unreasonably limit density, make many projects infeasible, and do not improve the pedestrian environment as claimed.
- Build-to line (BTL) percentages included in WEP Development Standard B.1 should be greater than 50%.

In addition to density and intensity, a good mix of land uses is also required to support walkability and bikeability. To ensure flexibility and a mix of uses, we encourage the city to move toward a more form-based approach to zoning in the coastal zone, rather than focusing so heavily on separation of uses. The current approach leads to some oddly fine-grained restrictions whose purpose is hard to discern, such as regulating various types of multifamily housing differently (medical, micro, shared-use, etc.—see WEP Table 6-1).

Additionally, while we appreciate the intention behind requiring ground-floor commercial uses in the Old Town and Commercial Bayfront districts (see WEP Tables 5-2 and 6-1, Goal WEP-1.1, and LUP Policies LUD-2.1a and LUD-2.1d), we believe that this could make many projects infeasible due to the existing jobs/housing imbalance in the area. This is likely the problem that WEP Development Standard C, which provides an exception to the commercial ground-floor requirement for dense projects, is meant to address. However, we suggest taking a somewhat broader approach and allowing residential ground-floor uses generally as long as they meet design standards for an active pedestrian frontage, such as requirements for public art, front porches, and window and doorway treatments. Nor do we believe it is necessary to prohibit uses such as daycares, fitness centers, medical facilities, colleges, social services, offices and general services from street-facing frontages, so long as they meet objective, pedestrian-oriented design standards.

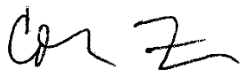
WEP Figure 6-2 shows an extremely limited area where “pedestrian-focused frontages” are required. Given the plans’ goals to create a pedestrian-friendly zone throughout the plan area, we believe pedestrian-focused frontages should be required much more broadly—at least all of Old Town and Commercial Bayfront West. However, we believe that rather than requiring Design Review (see WEP Development Standard D.2), pedestrian-focused frontages (both commercial and residential) can be ensured by adopting a well-crafted set of objective, form-based standards. The WEP Design Guidelines are a good start in this direction.

We submit the following additional comments on land use, density and intensity:

- New parking lots and structures should be prohibited in all districts (see WEP Table 6-1 and discussion above).
- Public plazas and pedestrian passageways are spaces for public gathering and transportation and should not have limited hours (see WEP Development Standards E.2e and E.2f).

Thank you for your consideration of our comments.

Sincerely,



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