



March 4, 2024

David Loya, Director of Community Development
City of Arcata
736 F Street
Arcata, CA 95521

Sent via email

RE: General Plan Update Draft Environmental Impact Report

Dear Director Loya:

The Coalition for Responsible Transportation Priorities (CRTP) and the Environmental Protection Information Center (EPIC) appreciate the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Arcata General Plan Update, including the Gateway Area Plan and Gateway Form-Based Zoning Code (collectively, the “project”). We support the project and look forward to its implementation. We submit the following comments on the DEIR in an effort to ensure that the environmental review of the project is as robust as possible.

Inaccurate Characterization of “Environmental Protection Actions”

Beginning on p.2.0-26, the DEIR lists a number of “environmental protection actions” incorporated into the project. We have identified two actions on this list which we do not believe provide an “environmental protection” benefit as described:

- The list includes a “Pavement Management Plan to...reduce hazards due to design features and improve water runoff.” However, as the name implies, pavement management plans are designed primarily (and usually exclusively) to keep pavement smooth and in good condition on streets. Smooth pavement does not “reduce hazards” for street users, and to the contrary may actually encourage dangerous speeding when compared to rougher pavement or potholes. It is also unclear how smoother pavement would “improve water runoff.”
- The list also includes a “Traffic Mitigation Fee Ordinance to mitigate traffic impacts.” “Traffic impacts” traditionally refers to congestion or Level of Service (LOS) impacts, which can no longer be considered environmental impacts under CEQA. Therefore, this can only be considered an “environmental protection action” if revenues from the fee are devoted exclusively to projects and programs which reduce vehicle miles traveled (VMT) and/or reduce street design hazards.

These items should either be removed from the list of “environmental protection actions,” or additional justification must be provided for their inclusion.

Vehicle Miles Traveled (VMT) Considerations

We appreciate the DEIR’s use of a new, more empirical approach to estimating traffic generation centered on the influence of land use diversity (see p.4.2-21 et seq.). However, we note that other important factors influence VMT and mode choice, and we believe that these factors should also be incorporated in order to improve the accuracy of the calculations. Such factors include the completeness of low-stress bike and pedestrian networks, the quality of transit service, and various Transportation Demand Management (TDM) measures and disincentives for driving.

We also believe that using the countywide average of VMT (or in this case, the land use mix proxy) as a significance threshold is not appropriate. The countywide average is skewed by large areas of very low population density with very limited potential for population growth. A more appropriate threshold for VMT significance is the average in the more heavily developed urban-suburban region around Humboldt Bay.

Nevertheless, while we believe both the VMT methodology and the significance threshold could and should be improved, we do not believe these changes will result in a different conclusion. It is clear that the project is specifically designed to reduce VMT, that it will succeed in doing so over the course of the planning period, and that therefore VMT impacts will not be significant.

Inconsistent Treatment of Population Growth Inducement

The Population and Housing chapter of the DEIR analyzes the project’s effects on population. The analysis notes that the city’s population (and therefore housing demand) is projected to increase due to factors outside the city’s control, that the project is in part an attempt to direct that growth in a responsible way, and therefore correctly concludes that the project “would not result in the direct or indirect inducement of unplanned population growth” (p.3.9-21). However, other parts of the DEIR seem to assume the opposite. For example, the Public Services and Recreation chapter claims that “population growth induced by the General Plan 2045 could require additional fire response vehicles and staff.”

Similarly, Alternative 3 in the Alternatives analysis is premised on the idea that merely reducing the prediction of population growth could reduce the actual population growth, and that “the scale of growth is in large part predicated on the policies that direct development to accommodate the growth.” This assertion is supported in part by the claim that new city policies to streamline development in the 2010s increased the population growth rate. However, as noted above, the development of housing almost always responds to, rather than creates, an increase in population or housing demand within a given housing market.

Alternative 3 may be predicated on the distinction between population growth within Arcata city limits and growth in the surrounding region. And it may be true that Arcata could constrict population growth within city limits, and force it into the surrounding region, by limiting housing

availability. However, this is a misleading distinction from an environmental impact perspective. The city is unlikely to have significant influence on regional population through its development policies, and the impacts of population growth in a more diffuse area surrounding the city would be greater, not less, than growth within city limits.

Significance of Air Pollution and Noise Impacts May Have Been Misconstrued

As noted above, the DEIR correctly concludes that the project will result in reduced VMT and no unplanned population growth. The DEIR's Greenhouse Gas Emissions chapter also extensively reviews the elements of the project designed to reduce VMT. In other words, the project will reduce VMT and therefore vehicular emissions impacting air quality.

It is somewhat confounding, then, that the Air Quality chapter concludes that the project will have a significant and unavoidable impact on air quality, specifically from increased emissions of reactive organic gases (ROG) and carbon monoxide (CO), as a result of "on-road mobile vehicle emissions" (see p.3.3-14). It does not seem possible for a project which reduces both VMT and emissions to have a significant air quality impact based on vehicular emissions.

The conclusion of significant impacts from ROG and CO emissions also suffers from two other major flaws. First, the analysis is under the category of impacts resulting from "a cumulatively considerable net increase in any criteria pollutant for which the Project region is nonattainment" (see p.3.3-13). The region is in attainment for both ROG and CO, so the criteria for significance are not met. Second, the significance thresholds used for these operational ROG and CO emissions are stationary source emissions thresholds; but these are mobile sources, and the DEIR only establishes the relevance of the stationary source threshold for mobile sources in the context of construction emissions lasting more than one year.

Considering all of these factors, we are forced to conclude that the project will not have significant impacts resulting from ROG or CO emissions, and the DEIR should be corrected. Furthermore, even if the impacts are deemed significant, it is incorrect to conclude that they are unavoidable. Additional measures to reduce VMT and mobile source emissions are possible. We suggested some of these measures in our February 11, 2024 letter to the Arcata City Council and Planning Commission, such as planning for needed bike and pedestrian upgrades.

A similar analysis also somewhat undermines the DEIR's conclusions of significant impacts related to the exposure of sensitive receptors to toxic air contaminants (TACs) and PM_{2.5} emissions (see p.3.3-15 et seq.) and significant impacts due to noise (see p.3.8-18 et seq.). These conclusions are certainly more supportable than those related to ROG and CO, because they pertain to exposure of sensitive receptors rather than overall emissions of air pollution or noise, and the project would concentrate traffic and people in certain areas. However, since the project would reduce overall VMT and therefore traffic-related emissions and noise, and these impacts would occur over a broader area in the absence of the project, it is not at all clear whether the project would result in more or fewer sensitive receptors being exposed to unacceptable levels of TACs, PM_{2.5}, or noise.

Environmentally Superior Alternative

The DEIR identifies the Environmentally Superior Alternative as Alternative 2, “upzoning single-family zoning districts.” The DEIR should explicitly describe the policy, environmental and other justifications for the city choosing not to adopt this alternative. It should also analyze the possibility of adopting certain parts of the Environmentally Superior Alternative into the project, such as by upzoning single-family districts surrounding Infill Opportunity Zones, where development is targeted by the project.

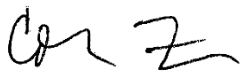
Errata

We note the following issues which we believe to be simple errors in the DEIR:

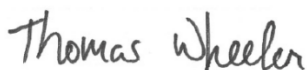
- Descriptions of the Gateway area districts on p.2.0-13 et seq. and Table 2.6-2 describe maximum heights up to 8 stories, but these height maximums have since been lowered through the city’s planning process.
- Image 2-2, the “Illustrative Plan” for the Gateway-Barrel District “illustrates” a project with a parking ratio of 1.25 spaces per dwelling unit, but the maximum ratio for this district is 0.5 units per dwelling unit (see Gateway Form-Based Zoning Code Table 2-32). The image therefore does not accurately illustrate a project which could be built in the Barrel District.
- The list of energy resources in Humboldt County at DEIR p. 6.2-1 lists only fossil fuel and biomass. The list should also include the many other renewable energy resources in which the region is rich, including wind, solar, wave, tidal, and hydroelectric; although not all of these are currently developed at an industrial scale, all are important energy resources.

Thank you for your consideration of our comments.

Sincerely,



Colin Fiske
Executive Director
Coalition for Responsible Transportation Priorities
colin@transportationpriorities.org



Tom Wheeler
Executive Director
Environmental Protection Information Center (EPIC)
tom@wildcalifornia.org