



April 15, 2025

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

via email: ckenyon@eurekaca.gov

RE: Comments on Draft Waterfront Eureka Plan

Dear Director Kenyon,

The Coalition for Responsible Transportation Priorities (CRTP), the Environmental Protection Information Center (EPIC), and Humboldt Waterkeeper broadly support the vision for future development laid out in the draft Waterfront Eureka Plan (WEP), especially the plan's increased focus on active transportation, transit, and denser mixed-use development. We also appreciate the fact that the current draft WEP includes some updates which address concerns raised in CRTP's July 3, 2023 comment letter. However, there are still some areas we believe could be improved.

Parking

We appreciate the WEP's acknowledgement of AB 2097, which effectively prohibits the imposition of parking mandates in most of the plan area. For parts of the plan area not affected by AB 2097, the WEP states at p.59 that it is "adopting the Inland Zoning Code's low parking ratios." However, no parking ratios appear in the WEP; rather, the document defers this decision to the Coastal Zoning Code (see p.49 of the WEP). As detailed in CRTP's July 3, 2023 letter, we strongly encourage the city to remove minimum parking mandates altogether, as they are unscientific, costly, and work against the city's and the state's many transportation, development and sustainability goals.

The abundance of existing parking in the plan area is partially documented in WEP Figure 3-2 and related land area calculations in the WEP. However, CRTP's thorough survey of off-street parking in this area¹ shows that Figure 3-2 does not include all off-street parking, and even CRTP's assessment does not include any of the abundant on-street parking.

The abundant parking currently available in the plan area is important to acknowledge for many reasons, one of which is that almost all stand-alone parking lots fall into the city's definition of

¹ See <https://transportationpriorities.org/parkinglotmaps/>.

“underutilized parcels.” Even on parcels with other buildings on them, the more land is devoted to parking, the more likely the whole parcel will fall into this category. However, the draft WEP explicitly excludes parking lots from the count of “underutilized parcels.” We recommend that the WEP include a discussion of the role of parking in promoting underutilization, and include parking lots in the category of “underutilized parcels.”

We also encourage the city to include in the WEP’s broader discussion of parking issues (beginning at p.72) a review of the role of parking cost and availability in inducing additional driving. The current discussion of parking issues fails to acknowledge the fact that the amount of “parking demand”—i.e., driving—is not fixed, but rather caught in a positive feedback loop with the availability of free or low-cost parking itself. Please refer to CRTP’s July 3, 2023 comment letter for more details on this topic.

Finally, we request that Action 2.5h be removed from the WEP entirely. As discussed above, there is already an abundance of parking in the plan area, and adding new parking will likely not relieve parking demand, but rather stimulate more. Furthermore, parking structures are extremely expensive, and building one would amount to a massive new subsidy for driving in the plan area, contrary to the WEP’s plans to encourage active transportation and transit.

Transportation, Mobility and Access

We appreciate the WEP’s focus on pedestrian, bicycle and transit access to, and circulation within, the plan area. However, we request that the WEP include a greater focus on accessibility for people with disabilities. While Action 2.5g of the current draft WEP only calls for a plan for ADA accessible parking in the plan area, we call for a much broader accessibility plan that includes pedestrian, bicycle and transit facility accessibility. People with disabilities are much less likely to drive than non-disabled people, so ensuring accessibility for all modes is critical.

We support the proposal for pedestrian passageways in larger developments (Development Standard D). However, we strongly urge the city to require such passageways to be open to the public at all hours to allow for their effective use as transportation facilities.

We also support the proposal to convert parts of F and 2nd Streets into woonerfs (Figure 5-2). We encourage the city to extend the boundaries proposed in Figure 5-2 to include 2nd Street west to C Street, to connect with the soon-to-be-constructed C Street Bike Boulevard, and potentially further east as well. Extending the woonerf would support the WEP’s goal to “activate the 2nd Street promenade.”

We submit the following additional comments on mobility and access within the plan area:

- We encourage the city to remove Action 2.2g from the WEP. Pedestrian bridges in such built-up areas are expensive to construct and maintain and are rarely convenient, safe, or well-used. Instead, we urge the city to work with Caltrans on narrowing 4th and 5th Streets, calming traffic, and enhancing street-level bike and pedestrian crossings.
- We encourage the city to remove Action 3.2h from the WEP. Encouraging more speeder rides will likely lead to a direct conflict with the goal of safe and accessible bike and pedestrian facilities on 1st Street and Waterfront Drive (Action 2.1f). Safe transportation

facilities for the public must take precedence over recreational amenities like speeder rides, especially when those rides are controlled and provided by a private entity.

Allowed Uses, Density and Housing

A dense and diverse mix of land uses is critical to a successful downtown and to walkability, bikeability and good transit service. There is currently a jobs/housing imbalance in the plan area and surrounding neighborhoods, with far more jobs and services available than housing units. WEP Chapter 5 discusses the need for additional housing in detail. For this reason, we suggest that the Old Town Commercial land use designation (p.34) and the Old Town zoning district should *not* prohibit ground-floor, street-facing residential uses (see proposed Development Standard C.3 and Action 2.2d), as long as pedestrian-friendly design standards are applied. We suggest that instead of traditional Euclidean zoning, the WEP move toward more form-based rules that are use-neutral. Ground-floor residential uses can be compatible with a pedestrian-friendly streetscape if thoughtfully designed, as many great neighborhoods around the world attest. We reiterate and incorporate by reference the comments in CRTP’s July 3, 2023 letter on these topics.

We submit the following comments on specific allowed uses, heights and densities in the WEP:

- The minimum FAR in the Old Town Commercial land use designation and accompanying Old Town zoning district should be higher than 1.0. The descriptions of the desired development characteristics in these zones include the term “multi-story” (see p.34 and p.37), and Table 4-2 indicates that the minimum height in the Old Town district is 2 stories. This means that a small 2-story building covering only half its lot could be built in Old Town under the proposed FAR and height rules, which is much lower density than desired for the area, and does not support a pedestrian-friendly environment. We suggest a minimum FAR of 2.0.
- We encourage the city to allow medical care housing and non-medical care housing as a permitted use in all zoning districts in the plan area. Requiring a conditional use permit erects a potential barrier to these much-needed forms of housing.
- We request that new parking lots or structures be prohibited uses in all zoning districts in the plan area. As discussed above, there is already an abundance of parking in the area, and allowing the construction of additional parking works against the plan’s goals.
- We appreciate and support the WEP’s lifting of density limitations in the form of maximum dwelling units per acre, allowing more infill housing to be developed.

Other Development Standards

We request that the city increase the “build-to line” percentage above 50% (see proposed Development Standard B.1), and designate the lot line (0 feet) as the maximum front setback, rather than allowing 10-15 ft setbacks. Setbacks from the sidewalk do not create pedestrian-friendly zones in the absence of features such as courtyards which would be eligible for a build-to line exception anyway (see proposed Development Standard B.2). In fact, the goal to have buildings placed “directly at the front property line” is expressed in the Design Standard F.1, but it is not mandatory; we advise making it mandatory by making it a Development Standard.

We also request pedestrian-friendly frontage designs be required throughout the plan area—or at least throughout the Old Town and Library District zones—rather than only in a limited area.

Design Standard F.8.c reflects this as a goal, but is not mandatory; we advise making it mandatory by making it a Development Standard, as long as additional flexibility is applied to allow ground-floor residential uses with appropriate pedestrian-friendly frontage features.

Sea Level Rise

The draft WEP defers much of the planning for sea level rise in the plan area to a future time. We encourage more active planning which anticipates future adaptation needs. In particular, to the extent that future retreat from the Commercial Bayfront is anticipated, we encourage increasing the maximum FAR and maximum building heights in the Library District, which is the highest ground in the plan area and the least susceptible to sea level rise, in order to accommodate any potential displacement. Increasing Library District density for this purpose is alluded to in Action 5.2c, but does not appear to be implemented through the WEP. Increased heights and/or FARs should also be considered in the higher-elevation portions of Old Town.

Thank you for your consideration of our comments.

Sincerely,

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