

**General Plan Update Commissioner Comments Compilation**  
**And Bike Rack**  
(current through 03/27/2023)

**Contents**

Commissioner Compilation for April 11, 2023.....	2
Mobility - Gateway.....	2
Public Facilities and Infrastructure .....	12
Circulation.....	12
Bike Rack .....	16
Vision Statement.....	16
Land Use Element .....	16

## Commissioner Compilation for April 11, 2023

### Mobility - Gateway

#### Considerations for Consent

- 1) I suggest we drop this added language and leave it as “the impacts of vehicular traffic”. Is there evidence that supports this? Couplets have the tendency to increase traffic loading but reduce congestion, so how would there be a reduction in these impacts?
  - a) One-way intersections with two-way and one-way streets will also benefit pedestrians and cyclists by shortening crossing distances, thus reducing exposure of vulnerable users to the impacts of vehicular traffic, ~~from noise and odors to injuries and cardiovascular impacts.~~
- 2) Not sure how this is efficient, this seems to be more of a privilege than an efficiency I suggest deleting “efficient”. Or perhaps request more information/elaboration from the Transportation Safety Committee. Also, add the word “Motorized”
  - a) GA-7a Plan the Circulation System to Accommodate Planned Growth. In planning for improvements to the overall circulation system, design the system to accommodate the planned amount of growth outlined in other policies. Ensure the circulation system supports a functioning, safe, sustainable multi-modal network. Support increased demands for all efficient forms of mobility emphasizing alternative modes – vehicles, trucks, transit, bicycles, and pedestrians, bicycles, and other non-motorized or shared transit options, then motorized vehicles, and trucks, in an effort to induce demand of multimodal transit alternatives and implement transportation demand management strategies, in keeping with Citywide Circulation Element policies (see also, GA-8a).
- 3) Not sure how this fits into this paragraph since this is discussing “outside” of the city ROW. Suggest deleting. Perhaps the committee was proposing to “Seek Opportunities to INCREASE public ROW”.
  - a) GA-7b.d - Outside of City rights-of-way, the alignments and widths of Class I trails (i.e., separated shared use paths) may need to be adjusted based on environmental constraints, community needs, the availability of right-of-way, and other factors. Seek opportunities in public rights-of-way to daylight creeks using bridges when reconstructing bike/ped infrastructure.
- 4) In GA-7b.f and g, Why don’t we just state “State and Federal Guidelines and other reliable professional sources”
- 5) Suggest to changing to “Feasible”. I feel this is contradictive. The intent of green streets is to treat in place; remove off-site language.
  - a) Where feasible available, pursue Opportunities for “green streets” infrastructure in streets/public right of ways, and provide for storm water features off-site (i.e., “storm water banks”). Consider opportunities to improve storm water drainage for the Jolly Giant Creek watershed Consider opportunities to incorporate stormwater treatment assets for roadway runoff in the Jolly Giant Creek Watershed.
- 6) How is this negative? Consider removing the word negative.
  - a) **Balanced Transportation System.** Create and maintain a balanced transportation system with choice of bus transit, bicycle, and pedestrian as well as private automobile modes. Reduce the percentage of trips that are made by automobile and provide the opportunity, incentives, and facilities to divert trips from automobiles to other modes. Provide negative incentives, such as

parking meters, permit parking, time limited parking, carpool incentives, and other targeted parking measures that encourage alternative modes utilizing “induced demand” strategies.

**7) I propose changing policy GA-7b(k) as follows:**

- k. Emphasize Class IV bike lanes where greatest benefit, and not in conflict with other community values or amenities where warranted. Class IV bike lanes shall be provided on current and proposed major thoroughfares including K, L, 8th, 9th and 11th Streets.
- a. Adding Class IV bike lanes will make these streets safer for all users. Most people won't bike on busy streets without Class IV protections, so building them is necessary to help the city meet its bicycle mode share goals. Maps, figures, diagrams and cross-sections included in the plan should be modified to reflect Class IV bike lanes on these 4 streets.

**8) I propose we make the following change to GA-7i:**

- b. GA-7i. No Net Loss of Class I Trail System. In general, retain both the current total linear feet of Class I trails and effective Class I trail connectivity within the Plan Area, even if current facilities must be realigned or relocated to other routes within the Plan Area. For instance, if implementing the realigned roadway network shown in Figure 8 and Figure 9 impacts the existing Class I Rail-to-Trail facility within the L Street right-of-way, then design and construct a new Class I trail in another location within the Plan Area. In limited circumstances, the City shall retain the discretion to allow an applicant to demonstrate removal or relocation of Class I Trail sections would improve active transportation access and connectivity. Collaborate with the Great Redwood Trail Agency and other landowners and agencies to retain and expand the Class I trail and Class 4 bikeways throughout the Plan area, including along L Street.
- c. Increasing trail connectivity makes using trails a feasible transportation option, allowing active transportation trips to be easier, safer, and more enjoyable. This should be a primary goal as development is undertaken.

Policy Pitch Proposals

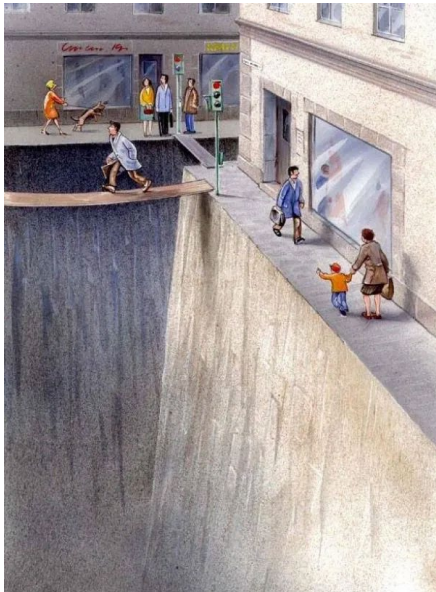
1. I propose changing policy GA-7b(a) as follows:

- a. Throughout the entire Plan Area, sidewalk widths may increase beyond six feet, especially on the north sides of east-west streets where expanded sidewalks on the sunny side of the street would allow welcomed outdoor seating, and at well-traveled pedestrian boulevards to ensure a clear path of travel. The clear path of travel should itself be at least 6 feet wide whenever possible. Adjusting sidewalk widths to will necessitate adjustments to the dimensions of other features, such as drive lanes, parking lanes, bike lanes, outdoor seating, street furniture, and the like. On-street parking lanes may need to be eliminated.
- b. A clear path of travel of at least 6 feet will make for a better pedestrian experience, particularly for people with disabilities. A welcoming pedestrian environment requires people to be able to comfortably pass each other and walk/roll side by side.

2. I propose changing policy GA-7b(i) as follows:

- i. ~~The trail within the Q Street right of way south of 10<sup>th</sup> Street may eventually need to be converted into a full vehicular roadway with a cross-section similar to other two-way roads proposed within the Plan Area.~~

- a. I don't believe we should be planning to add more roads to the gateway area. By reducing parking and building a more walkable area, we will reduce people's dependence on cars. In turn, that should reduce our dependence on adding more roads.
3. I propose changing policy GA-7b(i) as follows:
  - i. ~~The trail within the Q Street right-of-way south of 10<sup>th</sup> Street may eventually need to be converted into a full vehicular roadway with a cross-section similar to other two-way roads proposed within the Plan Area.~~
  - b. I don't believe we should be planning to add more roads to the gateway area. By reducing parking and building a more walkable area, we will reduce people's dependence on cars. In turn, that should reduce our dependence on adding more roads.
4. I propose we apply the woonerf concept not only to 6th Street, but also to 5th, 7th and 10th Streets within the Gateway Area. Doing so would encourage more walkability and make more of the gateway area plan non-vehicle focused. Figures 8, 9 and 10a should be modified accordingly. The following art illustrates better than I can say in words what we'd be getting back by making this change.



5. I propose we reduce drive lane widths to 10 feet and modify figures and cross-sections accordingly. Wider streets cause drivers to drive faster which makes streets less safe for everyone. Narrowing these streets would also give us more space for wider sidewalks and protected bike lanes.
6. I propose the following changes to the section "Functional Classifications of the Street System":
  - a. All streets within Arcata city limits, with the exception of access-controlled segments of Highways 101 and 299 and certain rural roads, are lined with homes and businesses and will be managed primarily to provide safe access and high-quality public space, regardless of functional classification. Slow speeds and traffic calming will be prioritized on all city streets. [delete the rest of the classifications]
  - b. The Federal Highway Administration's functional classification system is not a useful tool for guiding the design of city streets. This system is based on a suburban style of development that assumes dead-end local cul-de-sacs with houses on them feed into ever larger streets (collectors and then arterials) whose job is to get the residents of

those houses to other places. Even in this context, the scheme fails, because most commercial destinations are concentrated on collectors and arterials, creating the deadly “stroad” effect of streets that are designed primarily to move cars at high speeds but also have lots of destinations and multimodal use for which they are not designed. In a gridded streets system, such as the one that prevails in much of Arcata, functional classification makes even less sense. Our city streets all serve multiple purposes - as places for walking, biking, rolling, driving, and riding from one place to another, but also for accessing our destinations and even for social gathering. Pretending that access is just for local streets while others (arterials and collectors) are primarily for moving people quickly around in the city, while ignoring that all of our streets are in fact lined with destinations that people need to access, is unhelpful and leads to dangerous designs. It is not a coincidence that traffic collisions in Arcata are concentrated on the designated arterial streets, which are designed for speed and capacity rather than for access and safety. We should abandon this inappropriate way of thinking about our street system.

- c. If this is unacceptable, then as an alternative, I would propose adding this language as a header to this section. All streets within Arcata city limits, with the exception of access-controlled segments of Highways 101 and 299 and certain rural roads, are lined with homes and businesses and will be managed primarily to provide safe access and high-quality public space, regardless of functional classification. Slow speeds and traffic calming will be prioritized on all city streets. The language would serve as a reminder that even arterials should prioritize access and safety over convenience. This language would also be in more compliance with the “Complete Streets” policy included elsewhere in the plan.
7. I propose the following changes to the section titled “Operational analysis and intersection level of service (LOS) Summary:
- a. LOS shall not be a management consideration for city streets. Decades of research and experience show that projects which attempt to relieve congestion and improve LOS simply attract more traffic and are ultimately unsuccessful. Furthermore, congestion is often desirable from a safety standpoint, as it results in slower traffic speeds. Appendix A of this Element describes existing and projected traffic volumes and LOS for key City intersections. Although several unsignalized locations are projected to operate at LOS C or better, locations which experience higher volumes such as US 101/Sunset Avenue interchange, Alliance Road at Foster Avenue, Alliance Road at “M” Street/15<sup>th</sup> Street, and locations on 14<sup>th</sup> Street at “G” and “H” Street couplets are projected to operate at LOS D, E or F. Improvements anticipated by this plan (see Figure T-k) are expected to improve the LOS to acceptable levels for all intersections while balancing the priorities of active transportation goals. See appendix A for the complete analysis.
  - b. The effect of [induced demand](#) is well documented in transportation planning, and is even referenced in Arcata’s own planning documents. Managing for LOS means adding vehicular capacity (whether that means adding lanes or making smaller “functional improvements”), but the principle of induced demand dictates that any resulting reductions in congestion will be temporary - the street will fill back up with more cars soon. Managing for LOS is just pretending that induced demand isn’t real, when we know it is. In other words, [managing for LOS just doesn’t work](#).

Instead of managing for LOS we should be managing to reduce vehicle miles traveled (VMT) in order to reduce environmental impacts. The State recognized this in 2013 with

the passage of SB 734 which required all environmental studies for proposed projects in the state to switch from LOS to Vehicle Miles Traveled (VMT) as the critical measure of a project's impact. Previously, the state, its local municipalities, and its regional governments had been basing an assessment of a project's environmental consequences based solely on whether the project would create congestion. By focusing on VMT instead of LOS, CEQA now puts the planning onus on the reduction of car trips.

Furthermore, even if we could reduce congestion with engineering projects, it is not clear if that would really be desirable. Congestion, by definition, slows down traffic, and slower speeds result in greater safety for all road users. It's time for Arcata to stop prioritizing the annoyance of minor delays for drivers over the lives of community members and the environment. If fully rejecting LOS is out of the questions, other cities, like Seattle, have [reformed their LOS](#) to set specific target rates of transportation modes (e.g., walking, biking, transit, and driving) rather than solely focusing on driving.

I propose we update the section discussing the 2017-2022 (Transit Development Plan) TDP to state that the 2017 TDP is out of date, and a new one is about to be adopted.

**A 2023 Transit Development Plan will be adopted soon. The City shall make an effort to follow the recommendations in the 2023 TDP.**

\*\*\*\*

I propose the following changes to the section titled "Existing Bicycle and Pedestrian Facilities":

Arcata's bicycle transportation system consists of Class I off-street shared use paths, Class II bike lanes, Class III bike routes, and bicycle boulevards on public streets. Class I facilities are multi-use paths that provide a completely separated right-of-way for the exclusive use of bicycles and pedestrians with cross flows of motorized traffic minimized. Class II bike lanes provide a striped and signed lane for one-way bicycle travel on a street or highway within the paved area of a roadway. Class III bike routes are specially designated corridors in which the travel lanes are shared by motor vehicles and bicycles and are usually marked with on-street pavement stencils. Research has shown that Class III bike routes do not provide adequate safety or comfort for bicyclists unless significant additional design features are included. Bicycle boulevards are a type of Class III facility on low-volume roadways which prioritize the use of bicycles with traffic controls, signage, roadway markings, and traffic calming measures, including bicyclists having the right-of-way. Class IV bike lanes are protected from traffic by a vertical barrier. Arcata does not currently have any Class IV bike lanes, but research has shown that most people will not bike on busy streets without them. Arcata currently provides a ~~comprehensive~~ bikeway network connecting most major areas of the City on primary arterial streets, but many of the current facilities do not provide adequate protection for the comfort and safety of bicyclists. The primary Class I shared use path along the L Street rail alignment provides a north-south connection from the southern City limits and to the Humboldt Bay Trail south to Eureka, connecting to Alliance Road north of the Gateway area, and connects to Foster Avenue at Sunset Avenue. Additional Class I facilities provide brief connections between existing roadways and on-street bicycle facilities. Most Class II bike lanes

are located on north-south streets, while Class III bike routes and bicycle boulevards provide east-west connection on key streets. The western portion of the City (west of Alliance Road) is least served by bike lanes, providing an opportunity to expand the bike lane system to encompass more residential areas. Figure T-h presents the existing bicycle and trail facilities.

See the discussion of Class IV bike lanes above for the reasoning for these changes.

\*\*\*\*

I propose the following changes to the section titled "Proposed Circulation Network":

Arterial, collector, and local roads will provide access to new and established residential, commercial, and industrial areas, connecting those areas with the existing local and regional transportation system. Buildout of the General Plan land uses to year 2045 will increase multimodal, access ~~and parking~~ demands and will result in areas already under stress to exceed acceptable limits for safety ~~and delay~~. ~~As presented in Appendix A Table T-3, forecasted traffic operations at several intersections are projected to degrade to LOS D, E, or F.~~

In order to accommodate the existing and planned land uses within the City, a robust network of multimodal safety capacity improvements will be needed. ~~Based on buildout of the General Plan land uses and forecasted traffic operations, Several improvements are planned for most of the intersections projected to operate deficiently, mainly installation of roundabouts.~~ At the US 101/Sunset Avenue interchange, the City is currently undergoing the Project Approval and Environmental Document (PA&ED) phase of the interchange improvement, which proposes to install two roundabouts at the interchange including pedestrian and bicycle facilities.

Additionally, implementation of the mobility improvements within the Gateway Area Plan, including the "K" and "L" Streets couplets, and the 8<sup>th</sup> and 9<sup>th</sup> Street couplets extension, will ~~alleviate traffic congestion within the Gateway and will~~ ensure all transportation modes remain comfortable, convenient, safe, and attractive to residents, workers, students, and visitors.

See the discussion above about LOS and congestion management for an explanation of these changes.

Table T-5 and Figure T-k should be modified accordingly to remove projects motivated solely by congestion concerns.

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Add Class IV facilities to Table T-6.

\*\*\*\*

I propose that we make the following changes to Guiding Principle D:

Manage the street and highway system to promote more efficient use of existing capacities facilities rather than increase the number of travel lanes or make other capacity enhancements.

See the discussion above regarding LOS and congestion management for an explanation.

\*\*\*\*

I propose the following changes to Policy T-1d:

Critical transportation facilities for emergency vehicle access and emergency evacuation shall be maintained and improved as a priority need. However, when determining needed improvements, ease and speed of emergency vehicle access shall at all times be weighed against safe design for all street users. Critical transportation facilities include the major routes into and out of the City such as Highways 101, 299, and 255, their interchanges with City streets and primary intra-city street connections including Samoa Boulevard, 11th Street, "G" and "H" Streets, Sunset Avenue, L.K. Wood Boulevard, Alliance Road, Janes Road, and Giuntoli Lane. Due to the potential for structural failure of these facilities in a seismic emergency, alternative routes and procedures for their use shall be identified.

Emergency access is very important, but road design should not simply maximize emergency access or minimize response times in the absence of other considerations. Statistics indicate that more people in



the US die from car crashes than from fires, crime, etc., so maximizing lives saved means that safe road design proposals can't be automatically vetoed only because of emergency access concerns.

\*\*\*\*

Policy T-3: Ensure this policy is consistent with the adopted Regional Transportation Plan, which calls for doubling transit trips by 2025, again by 2030, and again by 2040.

\*\*\*\*

I propose the following changes to Section T-3a:

The City shall maintain-improve the existing A&MRTS routes (as shown in Figure T-de), frequency, and level of service as funding permits until increased demand, additional development, and transit planning studies identify the need for either route modification, an expanded route system, or increased service on existing routes. ~~The transit planning studies should evaluate the cost-effectiveness and feasibility of increased routes and service based on projected capital and operating costs, fare box recovery, and state and federal subsidies (see Policy T-3c for planning criteria).~~

The city can't meet its goal to increase transit ridership just by maintaining existing service levels. We have to improve the service as funding permits.

\*\*\*\*

I propose the following changes to Policy T-3c:

Public transportation is both a civil right and a critical climate solution, and should be designed to provide service competitive with automobile travel in terms of access, convenience and comfort. Potential improvements to the transit system should be assessed according to the best available evidence of both need and existing and induced demand. ~~an enterprise activity and its services must be designed to be as efficient and productive as possible. As a transit operator, the City must balance demand with resources for a sustainable system. The City shall consider adding transit routes or modifying existing transit routes and level of service based on the transit planning efforts described in Policy T-3a. Criteria to evaluate and identify thresholds for changes to the A&MRTS system shall be developed. General guidelines for planning future routes and service include:~~

- ~~1.— Accessibility of route to residents and employees. Calculate the number of people living or working within walking distance of the route (typically 1,000 feet). Assuming 1% to 8% of that population would use transit (based on existing transit mode share by census block), determine if the route will serve an adequate population for cost-effective service.~~
- ~~2.— Review the housing density within the proposed route corridor. Minimum densities of at least seven dwelling units per acre are necessary to support local transit service. Ideally, the average housing density within a transit corridor or transit served nodes should range between eighteen to twenty dwelling units per acre, depending on the proximity to stops.~~
- ~~3.— Evaluate the efficiency and directness of future routes. Compare bus travel time with automobile travel time to avoid a disproportionality which favors automobile use. Determine if the route requires inefficient loops which take riders out of their way and discourages transit use. Design routes to be as direct as possible with turnarounds at endpoints.~~
- ~~4.— Evaluate the diversity of the destinations served. Efficient routes serve a diversity of land uses including residential, employment, schools, and shopping. Evaluate the number of activity centers connected by the route and the transfer opportunities provided.~~

While I acknowledge that there are legal and practical limitations to the city's ability to provide public transportation, I believe it is counterproductive to view it as a "business" rather than as a basic right. We do not ask roads to pay for themselves (and they don't), and we shouldn't ask public transportation to do so either.



Additionally, while there is nothing inherently wrong with the enumerated planning guidelines, I believe it is preferable to allow the guidance to evolve as evidence and best practice evolve, rather than immortalizing them in the General Plan.

\*\*\*\*

I propose the following change to Policy T-3b:

Short- and long-range transit plans shall be coordinated with the regional transit service provided by the Redwood Transit System. The City supports regional transit plans which improve service and timed transfers, and reduce headways for intercity travel. In the interest of enhanced coordination and efficiency for local and regional service, the city shall immediately begin planning to merge A&MRTS with the Humboldt Transit Authority.

All other major transit services in Humboldt County are managed by HTA. Fully integrating A&MRTS into the HTA system will allow easier coordination and greater efficiency. I am aware that this has been discussed for years, but I can think of no good reason not to do it.

\*\*\*\*

I propose the addition of a Policy T-3h:

T-3h. A&MRTS shall study the possibility of pairing its traditional fixed-route bus system with an on-demand microtransit system which could serve lower density areas and feed into the fixed route system to increase transit mode share.

Significant technological advances and planning innovations have occurred in public transit since the last General Plan was adopted. It is increasingly accepted in transit planning that microtransit can be a good option for areas without high enough density to support traditional fixed-route buses. The city should explore this possibility for improving the transit system.

\*\*\*\*

I propose the following change to Policy T-4 Objectives:

Plan an internal street system the circulation network consistent with Figure T-k and Figure T-i and Arcata's small-town, non-metropolitan character to create Complete Streets solutions that are appropriate to individual contexts; that best serve the needs of all people using streets and that support the land-use, climate, safety, and environmental quality targets and policies of the City and which: 1) efficiently utilizes existing facilities and reduces need for investment in new or expanded street and highway facilities or capacities; 2) improves connectivity of streets to provide for direct routes between origins and destinations; 3) has a high quality of regular maintenance and repair; ~~and 4) maintains a level of service which minimizes delays, but allows for higher levels of congestion during the short peak periods on weekdays.~~

See above discussion of LOS.

\*\*\*\*

I propose the following modifications to the section titled "No additional vehicular travel lanes":

Street projects ~~shall not be designed~~ to improve vehicular traffic flow ~~shall emphasize intersection improvements and facility maintenance~~. If congestion occurs, it shall be welcomed or managed using alternative methods such as diversion of trips to other travel modes or intersection improvements. Construction of additional ~~arterial-street~~ vehicle travel lanes shall not be considered ~~only when no other feasible congestion management methods are available and if~~ unless it supports the land-use, climate, safety, and environmental quality targets and policies of the City.

See above discussion of LOS and congestion. These edits reflect the fact that adding lanes is not the only way to increase capacity, and that the principle of induced applies to any increase in capacity.

\*\*\*\*

I propose the following changes to Policy T-4c:

The City shall employ the following a range of measures to reduce speeds and “calm” traffic ~~throughout the city in the various commercial areas, near schools, public recreation areas and in residential neighborhoods~~ to improve safety and comfort for those walking, rolling, biking, and taking transit

Traffic calming is critical for safety, and there is no reason to limit this safety work to only certain areas of the city. This is related to the thinking about functional classification, which has resulted in dangerous arterial street designs.

\*\*\*\*

I propose the deletion of Section T-4c.4:

~~4. All neighborhood streets shall remain open to through vehicle travel unless there is a demonstrated safety problem that cannot be adequately addressed through the measures identified above.~~

The “Slow Streets” movement has shown how effective it can be to close local streets to through traffic, for improving safety and invigorating neighborhoods. There’s no reason to take this option off the table in Arcata.

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Table T-7: Add stop signs back into the list of traffic calming measures; Add lowered speed limits as allowed by law.

\*\*\*\*

I propose the following change to Policy T-5a.2:

Maintain existing bicycle routes and provide additional routes where feasible connecting the various neighborhoods with Cal Poly Humboldt State University. Class ~~III~~ bike lanes shall be provided on routes with the highest bicycle demand, or where there is sufficient right of way.

See above discussion about Class IV bike lanes.

\*\*\*\*

I propose the following changes to Policy T-6:

**Objective.** Manage parking to reduce the incentive for single occupancy vehicle use. Provide an adequate supply of parking in perimeter lots downtown. Minimize the impacts of Cal Poly Humboldt State University parking into adjacent neighborhoods. Ensure that new development provides an adequate but not excessive supply of parking.

T-6a **Downtown parking.** The following shall apply to parking within the Downtown area:  
~~1. Assess and plan for future parking needs. Municipal parking lots shall be provided in the perimeter of downtown to create an adequate parking supply to serve existing businesses, future development, and to replace on-street parking removed for pedestrian, bicycle, and landscaping improvements. One municipal lot is planned to complete the City’s parking system, but Assess the need for additional parking lots may be provided if additional demand or opportunities arise. The City shall explore implementing a smart parking meter system in the Downtown area to manage parking demand while generating revenue to support public transit and/or active transportation.~~

The concept of “adequate supply” of parking seems to reflect the assumption that a particular land use or number of people automatically translates into a certain amount of driving and parking. The evidence doesn’t bear out this assumption. Rather, we know now that the parking supply helps dictate the amount of driving. Reflecting this, and in alignment with the city’s other transportation goals, it seems logical to establish an objective to manage parking to achieve mode shift, for example by charging for parking.

For similar reasons, the idea of adding more parking lots to downtown based on “demand” seems outdated. Instead, managing parking through a smart meter system reflects modern best practices in

parking management, and would reduce the subsidy for driving and create a new revenue source to help fund other city projects. See the work of Donald Shoup for much more on this topic.

\*\*\*\*

I propose the following changes to Policy T-8a:

Developers shall be required to construct transportation improvements along their property frontages. Where appropriate, a traffic impact study shall be required which identifies on-site and off-site impacts and mitigation measures.

The developer shall be required to provide all necessary access and circulation facilities within the property and such facilities shall be designed to meet City standards. The following improvements may be required, based on the individual context and the needs of all people using streets and the right-of-way; and that support the land-use, climate, safety, and environmental quality targets and Complete Streets policies of the City:

1. If development is located on an existing street:
  - a. dedication of right of way;
  - ~~b. widening of street along property frontage to provide for a travel lane;~~
  - c. bicycle lane and parking lane;
  - d. reconstruction of curb, gutter and sidewalk;
  - e. transit facilities and landscaping within the right of way.
2. If development is located in a new growth area not served by streets:
  - a. dedication of right of way to construct a street to connect the project site to a public street, which accommodates all modes of transportation, particularly those walking, rolling, biking, and using transit;
  - b. construction of the street and connecting intersection(s) to City standards;
  - c. after the dedication is accepted, the City will maintain the street.
3. In all instances, the developer shall be responsible for mitigating any off-site ~~traffic-mobility~~ impacts of the proposed development in a manner consistent with the policies of this plan. Measures may include ~~a reduction in the size or density of the development;~~ installation of additional pedestrian, bicycle and transit amenities to encourage alternative travel modes; or implementation of Transportation Demand Management measures.

See above discussion of LOS and congestion management.

\*\*\*\*

I propose the following change to Policy T-8c:

The City may adopt a citywide traffic impact fee to fund transportation improvements to mitigate the ~~traffic-mobility~~ impacts of new development. The traffic impact fee may substitute in whole or in part for the off-site mitigation requirements described in Policy T-8a, but would be in addition to the developer's responsibility for on-site and frontage improvements. The traffic impact fee may be used to fund roadway extensions, intersection improvements, safety improvements, transit facility improvements, and pedestrian and bicycle facilities or amenities.

This change is to reflect the discussion of LOS above, to ensure that the focus is on multimodal mobility, not traditional "traffic impacts," i.e., congestion.

\*\*\*\*

I propose the following change to Policy T-8d:

A&MRTS should continue to fund capital and operating expenses through fare box revenue, Cal Poly Humboldt State University subsidies, and state and federal subsidies. The City will explore the possibility of new development contributing a one-time fee towards A&MRTS capital expenses through the citywide traffic mitigation fee ordinance and funding transit through parking meter revenues.

See above discussion of metered parking.

## **Public Facilities and Infrastructure**

### Considerations for Consent

## **Circulation**

### Considerations for Consent

- 1) Consider changing the name of the Element to “Circulation and Mobility Element.” Beyond simply adding the statement at the end of the introduction, full explanation that circulation and mobility do NOT necessarily relate only to vehicular transportation, with pedestrian and bike facilities tacked on, is important.

- 2) Consider **the following:**

#### **2.7 INTRODUCTION**

Circulation and mobility consider how people and goods move through and around the City. The circulation element addresses how a comprehensive, integrated transportation network can be planned to ~~achieve~~ maximize individual mobility in a manner consistent with community character and environmental protection. The City is committed to providing a complete, connected, multimodal transportation and mobility network. California law requires that transportation and land use policies be closely correlated. The Arcata General Plan accomplishes this in two ways. First, travel demand has been forecasted based on the amount and distribution of growth anticipated allowed by the land use plan. Second, ~~the policies of the~~ transportation, land use and air quality ~~policies are linked elements have been~~ interwoven to ~~provide a~~ balance ~~between~~ land uses and the transportation facilities that serve them. The overall theme of this element is achieving a balanced transportation and mobility system that is safe, accessible, comfortable, accommodating, and welcoming to all users. ~~Transportation and mobility planning and policies in Arcata will put the safety of people first, both outside of vehicles and in them.~~ CONSIDER ADDING explanation here recognizing that mobility goes beyond just the transportation conditions focusing on vehicular roadways.

- 3) **Safety first:** Include clear wording in the Introduction, Guiding Principles and Goals, and throughout the Element’s Policies to indicate that protecting and improving **safety must come first in all policies and transportation / circulation / mobility planning decisions.** Such wording is in line with a “Vision Zero” approach to transportation planning that strives to eliminate traffic-related death and injury as the highest priority in transportation planning, above and beyond speed, convenience, and financial cost. (Detailed suggestions for new wording are included in the “Track Changes” version of the MSWord draft Circulation Element.)
- 4) **Guiding Principles and Goals:** This entire section should be moved from the draft’s current location to an up-front location immediately after the Element’s **Introduction**. The **Guiding Principles and Goals** must be the basis for the rest of the descriptions, analysis, planning policies, and implementation actions that follow. In the draft, the **Guiding Principles and Goals** are hidden right before specific policies but AFTER the “Proposed Circulation Network,” halfway through the Element. They should certainly precede, not follow, the “Proposed Circulation Network” section.

- 5) **Transportation and Mobility Equity, & Safety First:** Add explicit principle and goal, as well as explicit mention in relevant policies, of the City’s intention to develop transportation and mobility policies and improvements to achieve mobility and transportation equity. Add to the “Principles and Goals” section” “The City recognizes that safe mobility is a right of all people in Arcata. The City will adopt policies and pursue plans that further transportation and mobility equity.” Such changes should appear in the “Guiding Principles and Goals” section, and in other relevant policies and specific plans for improvement, as indicated in my detailed suggestions.

**Guiding Principles and Goals**

**The City of Arcata shall:**

A. Provide a connected multimodal transportation and mobility system which allows that contributes directly to the safety, health, economic vitality, and quality of life of all people in Arcata. residents, and efficient travel.

B. Recognize that safe mobility is a right of all people in Arcata. The City will adopt policies and pursue plans that further transportation and mobility equity.

A. Put safety first in all transportation and mobility planning, policies, and projects.

B.C. Create a transportation system which provides that incentivizes a choice of travel modes and is safe, accessible, comfortable, accommodating, and welcoming to all users.

C.D. Provide for increased use of active and shared transportation modes as alternatives to the single-occupant vehicle, including walking, rolling, bicycling, public transit, carpooling/vanpooling, and ridesharing.

D.E. Manage the street and highway system to promote more efficient use of existing capacities rather than increase the number of travel lanes.

E.F. Create a multimodal transportation system which-that will improve the livability of residential neighborhoods, including use of methods to calm or slow traffic and reduce through-traffic on local neighborhood streets. ADD statement on varied ability mobility here

F.G. Educate residents, employees, and students about the importance of using alternative forms of transportation and mobility instead of the single-occupant automobile.

G.H. Promote land use patterns that encourage walking, rolling, bicycling, and public transit use.

H. Establish a set of curb-fee-based parking prices that are high enough to maintain an adequate supply of available spaces drive more active and shared transportation

6)

Policy Pitch Section

- 1) **Accessibility and mobility for people with varied abilities and disabilities:** Add explicit inclusive policies and language throughout the Element to address needs of people of diverse abilities and disabilities. (I have suggested detailed language in the “Track Changes” version of the Draft submitted to staff.) In the policy list, start with Policy T-1, BALANCED TRANSPORTATION SYSTEM WITH CHOICE OF MODES: After T-1e (or somewhere before): Insert this or similar policy –

a) **T-1f Improve accessibility and mobility:** The City shall undertake a comprehensive program to assess and improve accessibility and mobility for people of varied physical abilities and disabilities.” (In the Implementation measures list, this should happen in the next 1-2 years.)

- 2) I propose we change policy T-6 in the following ways:

a) **Objective.** Manage parking to reduce the incentive for single occupancy vehicle use. Provide an adequate supply of parking in perimeter lots downtown. Minimize the impacts of Cal Poly Humboldt State University parking into adjacent neighborhoods. Ensure that new development provides an adequate but not excessive supply of parking.

T-6a **Downtown parking.** The following shall apply to parking within the Downtown area:

~~1. Assess and plan for future parking needs. Municipal parking lots shall be provided in the perimeter of downtown to create an adequate parking supply to serve existing businesses, future development, and to replace on-street parking removed for pedestrian, bicycle, and landscaping improvements. One municipal lot is planned to complete the City's parking system, but Assess the need for additional parking lots may be provided if additional demand or opportunities arise. The City shall explore implementing a smart parking meter system in the Downtown area to manage parking demand while generating revenue to support public transit and/or active transportation.~~

b) The concept of “adequate supply” of parking seems to reflect the assumption that a particular land use or number of people automatically translates into a certain amount of driving and parking. The evidence doesn’t bear out this assumption. Rather, we know now that the parking supply helps dictate the amount of driving. Reflecting this, and in alignment with the city’s other mobility goals, it seems logical to establish an objective to manage parking to achieve mode shift, for example by charging for parking. For similar reasons, the idea of adding more parking lots to downtown based on “demand” seems outdated. Instead, managing parking through a smart meter system reflects modern best practices in parking management, and would reduce the subsidy for driving and create a new revenue source to help fund other city projects such as protected bike lanes and public transit. See the work of Donald Shoup for much more on this topic.

3)

4) With regard to the **Gateway Area, within the Circulation Element:**

The draft’s “**Proposed Circulation Network**” section addresses street and circulation changes City staff now propose in the draft Gateway Area Plan. Current language is “Additionally, implementation of mobility improvements within the Gateway Area Plan, including the “K” and “L” Streets couplets, and the 8<sup>th</sup> and 9<sup>th</sup> Street couplets extension, will alleviate traffic congestion within the Gateway and will ensure all thrasportation modes remain comfortable, convenient, safe, and attractive ...” However, significant disagreement among Arcatans, is far from resolved, especially about the proposed K/L Street one-way couplet. I recommend the following:

The City should fully investigate and publicly assess detailed alternatives to provide access to the west side of the Gateway Area. These will include a K Street / L Street one-way couplet, and detailed alternatives that would retain and improve the L Street corridor as a Class 1 bikeway, pedestrian way, and linear park, and retain K Street as a 2-way Arterial, with safety and traffic flow improved by possible means including new city-operated vehicle and pedestrian signals, left-turn lanes, on-street parking adjustments, and vehicle access to new development west of K and L Streets mainly via East-West streets; or other options including completing portions of M or N Street.

5) I propose we stop using Level of Service as a management consideration for city streets. And prioritize traffic calming and safety on all city streets regardless of classification. We can accomplish this through the following policy change:

a) LOS shall not be a management consideration for city streets. Decades of research and experience show that projects which attempt to relieve congestion and improve LOS simply attract more traffic and are ultimately unsuccessful. Furthermore, congestion is often desirable from a safety standpoint, as it results in slower traffic speeds. Appendix A of this Element describes existing and projected traffic volumes and LOS for key City intersections. Although



~~several unsignalized locations are projected to operate at LOS C or better, locations which experience higher volumes such as US 101/Sunset Avenue interchange, Alliance Road at Foster Avenue, Alliance Road at “M” Street/15<sup>th</sup> Street, and locations on 14<sup>th</sup> Street at “G” and “H” Street couplets are projected to operate at LOS D, E or F. Improvements anticipated by this plan (see Figure T-k) are expected to improve the LOS to acceptable levels for all intersections while balancing the priorities of active transportation goals. See appendix A for the complete analysis.~~

- b) The effect of [induced demand](#) is well documented in transportation planning, and is even referenced in Arcata’s own planning documents. Managing for LOS means adding vehicular capacity (whether that means adding lanes or making smaller “functional improvements”), but the principle of induced demand dictates that any resulting reductions in congestion will be temporary - the street will fill back up with more cars soon. Managing for LOS is just pretending that induced demand isn’t real, when we know it is. In other words, [managing for LOS just doesn’t work](#). Instead of managing for LOS we should be managing to reduce vehicle miles traveled (VMT) in order to reduce environmental impacts. The State recognized this in 2013 with the passage of SB 734 which required all environmental studies for proposed projects in the state to switch from LOS to Vehicle Miles Traveled (VMT) as the critical measure of a project’s impact. Previously, the state, its local municipalities, and its regional governments had been basing an assessment of a project’s environmental consequences based solely on whether the project would create congestion. By focusing on VMT instead of LOS, CEQA now puts the planning onus on the reduction of car trips. Furthermore, even if we could reduce congestion with engineering projects, it is not clear if that would really be desirable. Congestion, by definition, slows down traffic, and slower speeds result in greater safety for all road users. It’s time for Arcata to stop prioritizing the annoyance of minor delays for drivers over the lives of community members and the environment. If fully rejecting LOS is out of the questions, other cities, like Seattle, have [reformed their LOS](#) to set specific target rates of transportation modes (e.g., walking, biking, transit, and driving) rather than solely focusing on driving.

6)

7) **Traffic signals in policy T-4b Vehicular Circulation:**

With anticipated population to 28,000, and much denser development patterns in much of the city, it will soon be time to reconsider the City’s longstanding determination not to develop a traffic signal (traffic light) system of its own, above and beyond the CalTrans lights on Samoa Blvd and a few other high traffic locations. A Circulation Element policy would open that possibility:

3. [Improvements at intersections. Improvements at intersections shall be designed to allow the safe, comfortable, convenient and accessible use of streets and walkways for all roadway users.](#)

a) [Minor improvements at intersections. Minor projects to improve traffic safety include redistributing lane allocations and coordination of traffic signals. Improvement projects shall be designed to accommodate the needs of pedestrians and bicyclists.](#)

[The City shall consider developing City-operated traffic signals and signalized pedestrian crossings to accommodate new or denser land uses, traffic patterns, and safety concerns, especially Downtown, in the Gateway Area, and in the Giantuli / Valley West area.](#)

b) ~~6. Minimize the installation of new traffic signals. New traffic signals shall be provided only in instances where there is no feasible alternative to relieve a demonstrated safety problem at an intersection (based on documented accidents).~~ Alternatives which shall be studied prior to signals include roundabouts or installation and monitoring of all-way stop signs.

~~6. Minor improvements at intersections. Minor projects to improve traffic safety~~



- 8) **Transportation Advisory Committee: Policy T-4 4c 1** in the draft now hides the role of the Transportation Safety Committee within a single subsection of the sub-policy related to “Slowing Traffic.” I suggest a broader role for a re-named, re-framed committee, possibly a “**Transportation Advisory Committee.**” The Transportation Safety Committee’s narrowly defined role is too easy for City staff and officials to overlook, and even now does not reflect the diverse community concerns that come before them. I suggest:

**T-1g ADD POLICY: TRANSPORTATION ADVISORY COMMITTEE:** The City shall consider renaming its Transportation Safety Committee, and broaden its role to advise City staff, Planning Commission, and City Council on matters related to transportation safety, and diverse community concerns related to transportation, circulation, and mobility safety and accessibility.

9)

## Bike Rack

The following document the Bike Rack items that the Commission will resolve as time allows consistent with the Meeting Framework adopted March 14, and amended thereafter. Items shown in grey were discussed but no decision was made. Items without highlighting have not been discussed.

### Vision Statement

No Bike Rack issues.

### Land Use Element

1. I propose changing policy **LU-1c** as follows:
  - a. **Prioritization of transit and active transportation.** Reduce or eliminate minimum parking requirements **citywide**. ~~in areas where transit and active transportation is planned to support the transportation needs of the community, including neighborhoods where biking infrastructure, trails, complete streets, and transit is or is planned to be accessible.~~
    - i. I recognize that this policy was already changed based on my comments at a previous meeting. However, I worry that this current language accepts that there are areas of the city that we are choosing to leave un-walkable. My proposal makes this policy inclusive of the entire city.
2. **LU-2b: Diversity and choice in residential environments and LU-2c: Planned Development - residential.** These two sections represent another opportunity to incorporate wording to indicate that the City encourages housing for all, including currently unhoused people. I can suggest wording if we choose to do so.
3. **LU-6c: Protection of agricultural lands and uses within the City.** The second paragraph starts with “Private and public non-vehicular recreational activities such as hiking, riding, fishing, hunting, and other recreational activities...” I suggest we specify that the riding is non-motorized by adding that to the wording: “Private and public non-vehicular recreational activities such as hiking, **non-motorized** riding, fishing, hunting, and other recreational activities...” [how does this conflict with current policy]

4. **LU-1d: Streamlined Review and Standards in Infill Opportunity Zones:** We still haven't discussed what this will be, either in the Gateway, much less city-wide. *When will we discuss and resolve this? Let's not assume the model we adopt for the Gateway will hold City-wide. But it would be VERY CONFUSING if it doesn't!* I'm very uncomfortable including this as a policy unless we have those discussions BEFORE making a recommendation to the City Council. *I recommend changing this policy to CONSIDER adopting streamlined review and standards for Infill Opportunity "Zones".* Unless we have already addressed this in depth, include developing and adopting those changes as in implementation action.
5. **LU-1j: Encourage Valley West's growth as a major community center for north Arcata:** Eliminate the sentence "High density residential use in the Valley West Infill Opportunity Area will be streamline". It seems this is already part of the Infill Opportunity policy elsewhere, and we still haven't figured out what that "streamlining" will be. [develop objective standards to guide development review and approval...] staff needs to come back with these first.
6. **LU-3a Commercial-Central[C-C] :** 'The Commercial-Central Zone will continue to have no upper density limit'. *ADD: however, conditions of permit approval must avoid dangerous effects on public safety.*
7. **Table LU-4 INDUSTRIAL / PUBLIC FACILITY LAND USE CLASSIFICATIONS**
  - a. "EDUCATIONAL, CULTURAL & RELIGIOUS USES" are not listed for either of the Industrial zones. Would this prohibit vocational education facilities on an industrial site? (I support prohibiting K-12, daycare, or preschool facilities in Industrial zones.)
  - b. What is the point in including RELIGIOUS USES in this category? Can we eliminate mention of "Religious Uses" in this part of the Land Use element? (It doesn't show up there in our current LUC.) Remembering 1<sup>st</sup> Amendment rights, the City has little regulatory authority over "Religious Uses" beyond enforcing its own property rights on city-owned sites, and safety rules.
  - c. Residential uses are allowed in I-L zones, though limited and requiring Use Permits. When we amend the Land Use Code and its Use Permit standards for residential uses of I-L sites, let's think clearly and protectively about what IS allowed there, and who is vulnerable to those hazards (even in I-L permitted uses).
  - d. Urban Agriculture: I suggest allowing some "urban agriculture" on I-G and I-L sites, perhaps with a Use Permit to set appropriate conditions. Why is urban agriculture NOT allowed on Industrial sites (I-G or I-L), especially considering what IS allowed on them, and considering that industrial factories (with large-scale industrial structures) have been allowed on Ag Exclusive land? Which leads to ...
8. **LU-1q State mandated housing production** -- The new proposed **LU-1q** works well. I like that this policy represents a City commitment to advocating for reasonable state approaches to housing production in a small city like Arcata. However, **I suggest ending the policy statement with "... meet both state objectives and City need for housing," omitting the end of the draft sentence.** The plan says that elsewhere.
  - a. **LU-1q State mandated housing production.** The City recognizes that the state's housing goals have resulted in laws that increase density above City established base density, removed discretion in housing development, required streamlining in approval processes, established by-right development for certain housing types, and has reduced local control over many land use decisions related to housing production. The City shall

monitor and comment on state actions to advocate for reasonable solutions to housing production that meet both state objectives and City need for housing development that produces high-density, infill housing in mixed-use or residential projects in appropriately zoned and designated areas.

9. **New Policy LU-6f Restoration of former tidelands.** I'd like to propose an additional land use policy for inclusion in the Ag section of the land use element.
  - a. **LU-6f Restoration of former tidelands.** The City of Arcata recognizes the need to restore former tidelands to salt marsh in order to adapt to rising sea levels and promote biodiversity and a safe environment. The City shall encourage and support the restoration of former tidelands, currently zoned Agricultural Residential [A-R] or Agricultural Exclusive [A-E].

### Ideas for Discussion

1. **LU-1k: Support and revitalize other existing neighborhood and commercial activity areas.** This section promotes travel by walking, biking, and transit. One of its intentions to reduce vehicle miles traveled. Yet, it also encourages "improvement of parking." Do we want to also encourage the conversion of parking lots to other uses, such as housing, walkways, playgrounds, etc.?
2. Housing density limits are not expressed quantitatively in this element. Nonetheless, I suggest we consider adding language to address the possibility of housing bonuses affecting the overall density of development.
  - b. LU-2a: Residential Land Use Classifications. This section discusses different residential density zones. Given that the density bonus can be large and the rules covering the bonus are evolving rapidly, we can add language here so that we end up with a reasonable densities we can live with.
  - c. LU-3a: Commercial-Central (C-C): The last sentence reads, "The Commercial-Central Zone will continue to have no upper density limit." Do we really want to say that? Would a 12-story building be allowed in this district?
3. **LU-1k: Support and revitalize other existing neighborhood and commercial activity areas.** Although not a "neighborhood" center, it would also help to have some explicit mention of Uniontown, especially in light of AB 2011. Uniontown might be a prime target for mixed use redevelopment (and a reasonable one), if not under its current owners, then under some future ownership by 2045.
4. **LU-2: Residential Land use** That's real estate-talk. Change that to "residents." The policy refers to "in higher density developments". Clarify: Does that refer to RM and RH only? What about in those mixed use developments we're expecting, and in :PD Planned Developments?
5. **LU-2c: Planned Development – residential: Add:** Planned Development may also incorporate non-residential uses *where they will not reduce safety or livability for residents, and must include adequate walkways, and set conditions for commercial operations.* (Avoid a scenario where commercial use is added to a residential :PD and brings dangerous vehicle traffic or constant loud noise into a previously kid-friendly, quiet area.)

- a. The Implementation Measures list calls for the City to review sites in the :PD combining zone, and possibly releasing some of them from :PD requirements. However, new state housing laws already limit City discretion for projects that include affordable housing, and exempt some of those projects from CEQA review. The City should generally retain the discretionary review that the :PD combining zone provides, especially for already developed sites, to ensure that intensified development there does not threaten safety or existing environmental assets and recreational spaces.
6. **LU-3a Commercial use classifications** “Large scale retail uses shall require a use permit due to evaluate...” *Can we add a threshold size or scale?*
  - a. “Potential impact on existing and projected traffic conditions” – Add: pedestrian and residents’ safety
7. **Table LU34 COMMERCIAL LAND USE CLASSIFICATIONS:** (Questions mainly)
  - a. What is the rationale for adding Travel trailer [RV] parks to principally permitted uses in the C-G zone?
  - b. Will eliminating animal sales and services make existing pet stores and veterinary services in C-G non-conforming? Or are these rolled into some larger category?
  - c. Add to the “Gas sales” category electric vehicle charging stations? What about zip car rentals, etc?
  - d. Restaurants, Bars, Taverns and pubs, nighclubs: Will bars still require a Use Permit? If we’re now allowing on-site cannabis consumption, should these be added to the list?
  - e. Commercial Recreation / Entertainment: How come “outdoor recreation uses and services” are NOT allowed in either the C-C or C-M zones? Should they be?
  - f. Educational, Cultural & Religious Uses: Since no “Religious Uses” are actually listed, and since the City has limited authority to regulate them anyway, should we take “Religious Uses” off the category title? (AND ... Does the City have discussion / condition procedures set up for when an Arcata church decides XYZ is actually a religious use, and demands services to support it?)
  - g. Urban Agriculture: Not allowed in the C-C zone. So, NO herb or vegetable gardens on a temporarily vacant lot downtown? What about as an accessory use? (No commercial herb gardens in backyards and roofs? Or is that allowed under some other rule?)
  - h. Commercial – General This is mainly Valley West. With a max residential density up to 50 “units” per acre in addition to commercial uses on the same site (???), with density bonuses likely to allow up to 90 dwellings per acre, what do we envision in Valley West for this allowable density, especially in light of AB 2011?
8. **LU-3e Commercial – Central** : Residential use is allowed as the primary use on vacant sites. Presumably, NO maximum density & no parking? Given current vacancy rates, may existing commercial buildings be converted to residential use anywhere in C-C? [Staff Response - I think that is the next step. This could be an implementation measure]
9. **LU-4b Little Lake** : The City has sat on cleaning up its Little Lake site for 20 years. There’s some new activity there now. (I’d heard “staging and material storage” for the WWTP upgrades?) The draft policy is: “... The site shall be planned as a mixed-use development including passive recreational uses and a dog park. Development shall be consistent with the adopted Long Range Property Management Plan.” That plan indicates the site should be used for “economic development,” which presumably means jobs. But the property management plan doesn’t go

further than this. *I hope* our Sea Level Rise discussions on Tuesday will help us envision what types of structures could be safely allowed on that site – IF ANY – and strongly recommend against allowing permanent structures, or ANY “mixed use” that includes housing.

Throughout the Plan, let’s replace the term “passive recreational uses” with something that actually relates to land use / infrastructure, like “recreation facilities for walking, running, sitting, nature observation, and social interaction.” It’s more words, but better connotation in our sports-dominated society. [Staff response – no mixed use or residential use is planned on this site]

10. **Table LU-6: AGRICULTURE AND NATURAL RESOURCE LAND USE CLASSIFICATIONS**

- a. Coastal-dependent recreation in the A-E zone: What would this be? Duck hunting blinds? Kayak docks & rentals?
- b. Keeping confined animals isn’t allowed in the A-R zone. No backyard hen coop? No backyard goat pen? It’s odd that hens are allowed in residential zones but not in an ag zone. It might help to re-state the list of allowable uses to reflect scale of confined animal keeping (I think the LUC does this.)
- c. “Silvicultural operations” and “Aquacultural operations” are not allowed in either agricultural zone. It might make sense to allow tree nurseries and fish ponds, for example, with a Use Permit to protect groundwater and prevent noxious odors.
- d. Farm worker housing policy is clear for diked/ reclaimed former tidelands (**LU-6d2**) but not for other ag lands. Farm worker housing should count as “residential units” and “dwelling units” with standards identical to other housing or ADUs.

11. **2.3 IMPLEMENTATION MEASURES TABLE** – This is a bare-bones list, focusing on the near-term, with little except the “ongoing” items and Economic Development Strategic Plan 5-year updates that carries us beyond the first couple of years. It would be great to develop a much more substantial list of implementation actions to achieve the goals of the many policies in the Land Use element.

- a. It would help to include specific implementation measures for Policy LU-1b “Promotion of infill development and designated Infill Opportunity Zones,” if only to identify a time frame for action.
- b. LU-4 Pedestrian-friendly activity centers: These measures are more policies themselves, than specific implementation actions, and will be only parts of the types of form-based standards that would be needed to implement them. Once we have experience with a form based code in the Gateway, would it make sense to include an implementation measure to consider developing appropriate standards for the other activity centers?
- c. LU-5 Business park plans: The city should seriously revisit the “business park” master plan idea for Little Lake, even though the City is committed to putting those 12 acres to some economic use. Developing a site plan for Little Lake: Yes. But let’s reconsider calling it a “business park.”
- d. LU-6 Planned Development Overlay: An inventory of :PD sites will be useful. (See comments above.) But beware of using this review to eliminate City development guidance and discretion as a gift to developers.
- e. LU-7 Commercial Visitor Serving Overlay – Is there a rationale for retaining the Visitor Serving zoning designation? It seems the proposed Land Use classification system has

already assumed that the Commercial General classification is appropriate for Valley West, especially as so many of the motels there no longer serve “visitors.”