

Mads Odom

From: Fred <fred@arcata1.com>
Sent: Tuesday, June 06, 2023 9:15 AM
To: Sarah Schaefer; Meredith Matthews; Stacy Atkins-Salazar; Alex Stillman; Kimberley White; Scott Davies; Dan Tangney; Judith Mayer; cfigueroa@cityofarcata.org; Matthew Simmons; Peter Lehman; Joel Yodowitz; David Loya; Delo Freitas; Jennifer Dart
Subject: The Gateway Plan Form-Based Code has arrived

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To: Planning Commissioners, City Councilmembers, Staff

As you know, the Gateway Plan's draft Form-Based Code has arrived.

For your ease of viewing, it is available on [Arcata1.com](https://arcata1.com) through your City Council / Planning Commission portal page at:

arcata1.com/council or arcata1.com/pc

There is no commentary or discussion on the FBC at that website page -- just the code, sized for either tablet/desktop or for cell phones.

There are a few points we can note:

- We acknowledge that this is a draft. Still, there is much in this draft Form-Based Code which appears to have **ignored what Planning Commissioners have discussed and requested.**
- As is typical for documents from our Community Development Department, **there is no date or version number** written on this draft. Nor is the word "draft" anywhere on the document.
- **Inclusionary Zoning** is shown as: For projects with 30 dwelling units or more, a minimum of **3 percent of the units affordable to low income** households or 5 percent of the units affordable to moderate income households. I see this is **an unacceptably low amount of low- or moderate-income housing.**
- It calls for **approval of four-story apartment buildings by a single person** -- the Zoning Administrator. That is, a building the size of Sorrel Place would be approved by one person. For buildings of 2 or 3 stories, no noticing of the public and no hearing where the public might speak are required.
- The Plaza-sized public space shown in the Gateway Plan as a square block in the Barrel District has been **reduced to a half-acre** -- that is, roughly **one-third of the size shown in the draft Gateway Plan.**
- There is **no mention or any requirement for smaller buildings along the proposed L Street Corridor Linear Park.** These commercial-below / apartments-above buildings could be two stories, or three-stories with a deep setback on the 3rd story with an open patio, perhaps. But this is not brought up even as a concept.

- This draft Form-Based Code allows the construction of two-story buildings throughout the Gateway area. To me **this defeats the entire purpose of providing dense, walkable, ecological housing** for the people of Arcata. If what is built in the Gateway area are two-story apartments, then we have failed.
- This Form-Based Code allows the construction of **a five-story building that could be built as a vertical wall right on the property line** -- even if the adjacent property has a one-story single-family home.
- I've looked at or read a half-dozen or so Form-Based Codes, and I am not an expert by any means. To me, this draft Form-Based Code has about **40% of the information and code that is needed** for a good Form-Based Code for the Gateway Plan.

Unfortunately, after all this waiting, what we have here is a "Grade C" Form-Based Code -- or worse. As some people might view it, this is a Form-Based Code that **fails to provide for the intents and interests and purposes of the Gateway Plan.**

I am sorry to be such a "skeptic," as I am sometimes called. **But this is just not a very good or complete Form-Based Code. It does not fulfil our needs.**

-- Fred Weis



June 12, 2023

Planning Commissioners
City of Arcata
736 F Street
Arcata, CA 95521

via email: plehman@cityofarcata.org, sdavies@cityofarcata.org, jmayer@cityofarcata.org,
dtangney@cityofarcata.org, msimmons@cityofarcata.org,
jyodowitz@cityofarcata.org

cc: dloya@cityofarcata.org

RE: Comments on Draft Gateway Area Form-Based Zoning Code

Dear Commissioners:

The Coalition for Responsible Transportation Priorities (CRTP) continues to strongly support the Gateway Area Plan for its focus on encouraging equitable infill development designed to support walking, biking, rolling and public transit as primary modes of transportation. The implementation of the Plan relies on the proposed Gateway Area form-based zoning code (“draft code”), and we are pleased to have the opportunity to comment on that draft code now.

For the most part, the draft code lives up to the promise of the Plan to encourage a walkable, bikeable, transit-oriented community. We particularly support reduced parking mandates, strong “pedestrian realm” and trail/greenway design standards, transportation demand management (TDM) measures such as unbundled parking, and frontage standards to create a welcoming pedestrian environment.

However, there are areas where the draft code could and should be strengthened, including:

1. Eliminate all remaining parking mandates for existing and future uses.
2. Remove setback and de facto setback requirements.
3. Increase minimum heights and densities.
4. Prohibit structured and podium parking and do not allow garage doors on public streets.
5. Require adequate long-term and short-term bike parking.
6. Allow a car-free community square.
7. Ensure efficient and objective project review and avoid future planning conflicts.
8. Consider increasing required non-residential ground floor frontage area.

Following are our detailed comments:

1. Eliminate all remaining parking mandates for existing and future uses.

The draft code has eliminated minimum parking mandates for most future land uses (see Table 2-32), a decision we strongly support. However, parking mandates are retained for “employment uses” and hotels. This is illogical and unhelpful. The same reasons to eliminate parking mandates for residential and commercial uses apply to these other uses as well: the mandates have no scientific basis, they encourage and subsidize driving, and they create significant unnecessary costs and logistical difficulties for new development.

Additionally, Section 9.29.080.B states that “all off-street parking and loading requirements” that apply elsewhere in the city also apply in the Gateway Area, except for “all land uses established after the Gateway Area Plan is adopted.” This implies that existing uses must maintain compliance with minimum parking mandates found in adopted city code. This requirement is unnecessary, inconsistent with the goals of the Gateway Area Plan, and could prevent the productive reuse of areas currently devoted to parking.

All minimum parking mandates should be eliminated for both existing and future land uses in the Gateway Area.

Additionally, we ask that Section 9.29.080.F.4 be amended to prohibit parking areas beside buildings as well as in front of them. In other words, all parking areas should be behind buildings. Parking lots between buildings create an unwelcoming pedestrian environment.

2. Remove setback and de facto setback requirements.

The best practice for creation of a pedestrian-friendly neighborhood is to build to the edge of the sidewalk or pedestrian zone. This both creates a more welcoming, person-scale pedestrian environment, and allows development at higher densities to support greater walkability. The Gateway Area is meant to be a pedestrian-friendly environment, but instead of build-to lines (BTLs) at or near the sidewalk, the draft code requires significant setbacks on most street-facing frontages (see Tables 2-21, 2-23, 2-25 and 2-27). It is possible that these “setbacks” are meant to accommodate the pedestrian realm dimensions specified in Section 9.29.070.A, but this is not specified, and the dimensions do not fully align. In any case, Section 9.29.070 will itself accomplish the goal of a setback occupied by an enhanced pedestrian environment without the need for additional setback requirements elsewhere.

Although similarly unclear, maximum allowable setbacks in the code are also far too large. As one example, Section 9.29.050.A.3 allows up to 25 foot setbacks on “active” frontages. If this is read to allow “pedestrian-friendly” building to be set back up to 25 feet from the sidewalk or pedestrian zone, it will create a distinctly pedestrian-unfriendly environment. In many other cases, the draft code includes no maximum setback at all, further exacerbating this problem.

Additionally, Section 9.29.060.G.2 specifies that ground-floor frontage standards meant to enhance the pedestrian environment do not apply if a building is set back more than 20 feet from a sidewalk. Combined with the minimum and maximum setbacks found in Tables 2-21, 2-23, 2-

25 and 2-27, this could allow or even require buildings to be set far back from the sidewalk while providing no pedestrian frontage enhancements.

The draft code also creates de facto setbacks in the form of excessive minimum frontage zones for residential buildings. Table 2-30 establishes minimum pedestrian frontage zone widths which are greater for residential frontages than for “active” non-residential frontages (15 feet vs. 5 feet). We strongly support frontage zones on busy sidewalks. However, a frontage zone should be where the building and its activities interact with the sidewalk—creating space outside of the pedestrian clear path for active uses—not a passive buffer or setback from the sidewalk. As such, it does not make sense for the zone to be bigger for residential frontages than for public-facing commercial frontages. Uses such as “landscaping” listed for residential frontage zones in Section 9.29.070.B.2 betray that the intended purpose of this extended “frontage zone” is likely as a setback, which is neither necessary nor appropriate. 5 feet is a reasonable minimum frontage zone for all building types, as it can accommodate outdoor dining and displays for commercial frontages as well as features such as stoops and doorways for residential frontages. While some developers may desire a larger zone for ground-floor residential to accommodate specific design features, we can think of no compelling reason to require it, and doing so effectively reduces potential housing production and density without adding to the quality of the pedestrian realm.

We strongly encourage you to remove all minimum setbacks, as well as de facto setbacks in the form of extended residential “frontage zones,” and instead establish BTLs at the back of the pedestrian zone in all Gateway sub-districts, with BTL percentages of 75% or greater.

3. Increase minimum heights and densities.

We reiterate our request that minimum building heights in the Gateway Area be increased from 2 stories to 3 stories (see Tables 2-22, 2-24, 2-26 and 2-28). Additionally, this minimum height should apply to all buildings. Currently, a footnote in each of these tables indicates that the minimum height applies only to residential uses, leaving open the possibility of low-density commercial or mixed-use buildings. Walkability and bikeability requires not only residential density but also a dense mixture of uses, keeping homes and businesses close together. This makes building height important for all uses, since taller buildings allow for more homes and businesses close together.

The minimum residential density for Gateway Ministerial Permit eligibility should also be increased. Currently, Section 9.29.020.B.3 proposes a minimum of only 25 units/acre, which is quite low; it could conceivably be achieved with small single-family homes with accessory dwelling units (ADUs). Furthermore, allowing a ministerial approval pathway for a mixed-use project that devotes 2/3 of floor area to residential with no corresponding density requirement could allow for very low-density projects. After increasing the minimum dwelling units/acre, the two criteria listed in Section 9.29.020.B.3.a should be connected by “and” (not “or”) to ensure appropriate residential density in all projects.

Finally, the potential for building height to contribute to walkable and bikeable density should not be overly constrained by setback requirements. In particular, the “enhanced upper story step back” requirements proposed for certain locations (see Figure 2-38) should be eliminated. They

are justified as being necessary to mitigate impacts on adjacent low-density residential uses, but their application on the proposed map appears haphazard. As proposed they will unnecessarily lower density without creating an orderly transition of uses.

4. Prohibit structured and podium parking and do not allow garage doors on public streets.

Parking garages and podium parking simply cannot create a pedestrian-friendly environment, no matter how they are screened or obscured. Section 9.29.060.I.2 attempts to mitigate the potential impact of such structures, but experience in countless cities and towns shows this will never be fully successful. Furthermore, some of the standards proposed for obscuring structured parking, such as “the appearance of habitable use,” are clearly subjective and therefore not appropriate for a form-based code. Instead, structured parking—including podium parking—should simply be prohibited in the Gateway Area.

Section 9.29.060.I.2 also limits the number of garage door openings onto street frontages, which we appreciate. Again, however, this is a partial measure which will fail to create a fully welcoming pedestrian environment, and in this case will pose actual safety risks to pedestrians. Garage doors should simply be prohibited from facing public streets.

5. Require adequate long-term and short-term bike parking.

Paragraphs 1 and 2 of Section 9.29.080.G, regarding bike parking, seem to provide two different and contradictory forms of a bike parking requirement. Paragraph 2 specifically refers to vehicular parking mandates which will not apply in the Gateway Area and inappropriately ties vehicle parking—which the city should be discouraging—to bicycle parking—which the city should be encouraging. Paragraph 2 should be removed from the code.

It is also important to differentiate between short-term bike parking, required for residential guests and visitor-serving uses, and long-term, secure, weather-protected bike parking, required for residential and employment uses. We request that the employment and residential use bike parking requirements listed in Table 2-34 (mis-labeled “12-34”) be clarified as requiring long-term secure parking spaces, and that a smaller number of short-term bike parking spaces also be required for these uses. Secure, weather-protected facilities at home and at work are critical for the feasibility of biking as a mode of transportation.

6. Allow a car-free community square.

Section 9.29.090.B.2.c requires the future community square in the Barrel District to have “street frontage on at least 2 sides.” This implies that there must be vehicular access to the square. Arcata already has a Plaza with vehicular access on all sides, and has retained it despite substantial support for a car-free Plaza over many years. There is no reason to preemptively foreclose on the possibility that a new public square could be car-free, particularly in the Gateway Area. We request that you remove the requirement for street frontages for the Barrel District community square.

7. Ensure efficient and objective project review and avoid future planning conflicts.

We reiterate our concern that having the Planning Commission review certain projects for their conformance with objective standards (see Table 2-19) will be a frustrating and ultimately unproductive exercise. We suggest that conformance with code standards be determined by a more appropriate review authority such as the Zoning Administrator.

Additionally, although we appreciate the intent of the contemplated Barrel District Master Plan, we are concerned that the future planning process to develop this Master Plan would be redundant with the present planning process and could result in inconsistencies within the Gateway Area Plan. We suggest that the goals of a Master Plan could perhaps be achieved simply by applying the concepts in the Gateway Area Plan and the standards found in the draft code, avoiding an additional lengthy and potentially conflicting process for planning development on the same area of land.

8. Consider increasing required non-residential ground floor frontage area.

Section 9.29.050.A defines “active” frontages as explicitly non-residential, and this term is used throughout the code. We find this term misleading and confusing, as ground-floor residential frontages also can and should be designed to create an “active” and welcoming pedestrian environment. We request that you remove the term “active frontage” from the code and describe these frontages more accurately as “non-residential ground floor.”

Figure 2-36 shows a small area where “active” (non-residential ground floor) frontages are required, primarily along 8th and 9th Streets. We believe that non-residential ground floor frontages are most valuable along current and planned major corridors, which include not only 8th and 9th but also K Street and Samoa Boulevard, and we encourage you to consider expanding the required area to include these corridors.

Additional Comments

We submit the following additional comments on the draft code:

- We reiterate our suggestion that the city re-name the sub-districts within the Gateway Area in consultation with the Wiyot Tribe (see Section 9.29.010.B).
- The list of transportation demand management (TDM) measures found in Section 9.29.080.C is not a complete list of effective measures in all circumstances. Measures not listed include employee shuttles, guaranteed ride home programs, health insurance premium discounts, work schedule flexibility, and more. The text should be amended to note that the list is not exhaustive, and also that the TDM plan requirement cannot be met solely with measures that are already required elsewhere in the code.
- Section 9.29.070.B.4 implies that street trees are required, but provides only a minimum spacing (not a maximum). With no maximum spacing, a developer could conceivably meet the requirement with a single tree.
- Section 9.29.020.D.4.b requires non-residential projects to be very large to be eligible for a Gateway Use Permit. However, the goal of development in the Gateway Area should be intensity or density, not size. We suggest that the job and commercial square footage thresholds should be set relative to lot size, not as absolute numbers, to allow for moderately sized but high-intensity projects.

- Table 2-19 includes an apparent internal inconsistency. As currently written, it appears that projects 40-47 feet in height could either get a Zoning Administrator or Planning Commission hearing, with no clarity provided on the circumstances under which each review authority would apply.
- Section 9.29.080.A should provide a clear definition of “greenway,” including how it differs from a “linear park” (Section 9.29.090.C). Additionally, it is unclear why such a large “frontage zone” setback is required for greenways (see Table 2-31).
- Section 9.29.080.F.2.a should allow two one-way curb cuts *or* one two-way curb cut, not both.

Thank you for your consideration of our comments.

Sincerely,



Colin Fiske
Executive Director
Coalition for Responsible Transportation Priorities
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June 12, 2023

VIA ELECTRONIC MAIL

City of Arcata
Planning Commission
c/o David Loya, Director of Community Development
736 F Street
Arcata, California 95521
Email: dloya@cityofarcata.org

Re: *Planning Commission Special Meeting on June 13, 2023*
Agenda Item III(C)—Comment on Proposed Draft Gateway Area Plan

Dear Director Loya:

On behalf of our client, EdgeConneX, Inc., we respectfully submit the following comments in advance of the City of Arcata's Planning Commission Special Meeting on June 13, 2023. These comments address Agenda Item III(C), which concerns the Draft Gateway Area Plan. EdgeConneX supports the Gateway Area Plan's rezoning efforts. But EdgeConneX offers these comments to clarify allowed uses in the proposed Gateway Hub (G-H) zone and otherwise to conform allowed uses under the Gateway Area Plan. The requested revisions include revisions to the [Draft Land Use Element](#), the [Draft Gateway Area Plan](#), and the [Gateway Area Table](#).

For context, EdgeConneX owns property at 1296 11th Street (APN 020-123-002). The City's recent rezoning efforts include this property, and will rezone the property to G-H. There is, however, a potential inconsistency in how the rezoning will apply to this property. For instance, the property is presently zoned Industrial-Limited (I-L). Allowed uses under I-L include "light industrial activities (when conducted within a building)," such as the property's current use as a data center and uninterrupted power supply battery storage. EdgeConneX understands that the Gateway Area Plan will not narrow or impact these allowed uses. But to clarify this understanding, two suggested changes can benefit the Gateway Area Plan and assist those that will rely on the Plan.


First, EdgeConneX requests that the Gateway Area Plan expressly confirm that the G-H district will permit the same uses allowed under the current I-L zone. The City's Draft Land Use Element explains that the proposed G-H district will allow for "light industrial, and other similar uses." This explanation implies that allowed uses under I-L fit within the "light industrial" activities allowed under the G-H district. As a result, EdgeConneX understands that its present and future use (e.g., data center, battery storage) will remain legal conforming uses. We would appreciate the City confirming and making this understanding more explicit in the Gateway Area Plan.

Second, there are slight inconsistencies in allowed uses within the G-H district among rezoning documents. The City's Gateway Area Plan, for instance, provides that the G-H district would allow for "light *manufacturing* and other similar uses." The Gateway Area Table, however, provides that the G-H

district would permit “light *industrial*, and other similar uses.” Since the difference between “light manufacturing” and “light industrial” activities is arguably material, EdgeConneX asks that the City clarify and make consistent the terms used within the Gateway Area Plan and Gateway Area Table by using the term “light industrial” exclusively.

EdgeConneX appreciates that the City’s rezoning involves a substantial effort, and that this effort is a work in progress. EdgeConneX supports these efforts. And to that end, EdgeConneX offers these suggestions to ensure that the final Plan avoids inconsistencies on issues like allowable uses.

Regards,



Sean G. Herman
Senior Counsel

cc: *Via Email Only*

Bridget Dory, City Clerk (bdory@cityofarcata.org)

Commission Member Peter Lehman (plehman@cityofarcata.org)

Commission Member Scott Davies (sdavies@cityofarcata.org)

Commission Member Judith Mayer (jmayer@cityofarcata.org)

Commission Member Daniel Tangney (dtangney@cityofarcata.org)

Commission Member Joel Yodowitz (jyodowitz@cityofarcata.org)

Commission Member Matthew Simmons (msimmons@cityofarcata.org)

Mads Odom

From: Keenan Hilton <keenan.a.hilton@gmail.com>
Sent: Tuesday, June 13, 2023 8:30 PM
To: Peter Lehman; Scott Davies; Judith Mayer; Dan Tangney; Matthew Simmons; Joel Yodowitz
Cc: David Loya
Subject: Comments on Gateway Code Draft

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Greetings Commissioners,

I wasn't totally clear on the comment format of the meeting so I didn't register my comments at the appropriate time tonight (not a complaint, comments at the beginning seems like a fine notion).

First I would like to congratulate you and staff on the tremendous work you're doing on the gateway. This is a very impressive planning effort with a robust process and some great ideas in the works. Here are a couple pieces of feedback I would like to offer:

- 1) Allow staff to administer the ministerial permits (i.e. remove public hearing requirement). Requiring a public process for a ministerial permit seems like a recipe for needless frustration. It sets up an expectation that even if a project meets all objective criteria that it can still be denied. Save a lot of headaches and have this ministerial process function like other ministerial processes.
- 2) Eliminate parking minimums. I know this one is contentious, but removing minimums doesn't stop a motivated developer from putting in parking. Parking is not a valuable enough use of land to require minimums.
- 3) Increase the minimum heights. This goes hand in hand with removing parking minimums to support transit use and walkability. Transit ridership rises directly with density. That is, each person is more likely to use transit if they live in a denser area (Parsons Brinckerhoff Quade and Douglas, *Transit and Urban Form*, TCRP Report 16). Let's not fall short on the density goals here - it disproportionately supports many of the other interlocking goals of the plan.
- 4) Allow for the community square to be car free.

Again I want to end with applause for the vision and process. Looking forward to seeing this adopted.

Thank you,
Keenan

Mads Odom

From: Chris Richards <cjrichardsauto@sbcglobal.net>
Sent: Tuesday, June 13, 2023 12:50 PM
To: David Loya; Scott Davies; Judith Mayer; Dan Tangney; Matthew Simmons; Joel Yodowitz; Peter Lehman
Cc: Kimberley White; Sarah Schaefer; Meredith Matthews; Stacy Atkins-Salazar; Alex Stillman; Karen Diemer
Subject: 6/13/2023 Planning Commission meeting comments

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Hello Commissioners and et al-

I have a few comments, suggestions and related notes for you consideration.

Process items:

- Looking at the 6/13/23 Agenda on packet page 146 it shows the agreed schedule for 6/13/23 and 6/27/23 is to be used for "Bike Rack" or as I call it, unfinished discussions/business. It appears that this "Special" branded meeting format that was advertised/sold as a mechanism to expediate GAP draft and General Plan 2045 process is now including a focused look at the newly released Form Base Code draft as well as a normal business item for the Approval of Design of the proposed 40E 7th Street remodel. It also appears that you will not have time dedicated for "Bike Rack" items and may even drop the list of unfinished business onto the City Council in your Proposed July finish timeline. Further it appears that the PC's schedule does not have a specific time/schedule allotted for complete review and processing of the proposed Form Base Code draft. Finishing "Bike Rack"/unfinished discussions/business should not be let to fall through the cracks. Also the process for evaluating, modifying, and gaining public support through engagement of the important Form Base Codes should have appropriate, considerable and adequate time scheduled. Please consider asking the City Council for adequate additional time for completing these important tasks.

- Additionally, the 6/13/2023 Agenda packet's "Attachment E" includes "Other Considerations" and appears to be outdated and incomplete. It shows a date of 2/1/2023. It is also stated as a "draft" so I hope you can ask staff (David Loya etc.) to update this draft with all the missing items that should be included. Attachment E appears as a mere small Pamphlet or Leaflet. It is laughable and equivalent to "throwing a pie in the community's concerned face", If Attachment E is to be used to show all the "Competing and Comporting" values set forth since Dec. 2021 from City Committees, the Community, as well as the City Council, I would strongly ask you consider broadening, expanding, and including much more. Also, discussion of the Competing and Comporting issues should be set as an agenda item and officially, transparently, and fully explored. This would go a long way in helping to gain Community Support and understanding, as well as help to iron out some of the major issues that folks are so concerned about.

Codes, Land Use Values, and Reality:

- The Gateway Area Plan draft, General Plan 2045, and the newly released GAP's Form Base Codes draft all have the inherent problems associated with the Coastal Zone/Element. I recommend the Commission work with staff and glean out the obvious issues inherent to the unfinished and problematic Coastal Element. Passing forth Codes, Zoning and Land Use policy without a solid, complete and finished Coastal Element is an issue and will necessitate additional future review and major policy changes. Three of the Four proposed new Land Use areas inside the Gateway Area Plan overlap or "straddle" the CA Coastal Zone. Completing policy with

this problematic "Straddling" should be avoided, or as said, "Is Not good Planning". I would advise that separate Land Use Zones and related Codes be created for the proposed GAP District's areas that fall North of the Coastal Zone. I can suggest as a processual tip to use the existing work you have accomplished so far for the Coastal "free-zone" Northern proposed GAP Land areas and create a Specific or Precise Plan later for the Coastal Zone land areas. My understanding is the Coastal Commission will most likely kick back on this plan as well as the associated language in our incomplete and problematic Coastal Element anyway, so why not get a jump on this now. Also now is an opportune time as the writing and process for the EIR could still evolve and be adapted. An additional EIR should be used for the Coastal Zone Land Use and Zoning anyway, in my opinion. I understand there are plenty of moving parts to all of this process but hope you can consider and acknowledge the associated problems with the GAP zones straddling the Coastal Zone.

L/K Couplet issues:

- Please re-consider your Straw Poll vote that led to a more concrete (literally) vision of the new Arterial Truck Route on L Street. The City does not own the property that is necessary for this Couplet Plan, nor will they be likely to ever gain the property without the use of legal process and battle. Also, there is a tremendous number of Community members as well as City Commission and Committee members that are fully against the Couplet vision. Options for safety changes on K Street could and should be fully explored. The Planning Commission's current negating stance of retaining L Street as a People Friendly Corridor without Arterial Truck Traffic should be further reviewed. Language and advice that leaves more varied opportunities, options and alternatives on the table are always a good idea, especially in this case when there is overwhelming community support against the Commission's current Straw Vote values.

Thanks to/for Commissioner Judith Mayer for including all your suggestions in the 6/13/2023 Agenda Packet. One inclusion is for the L Street Linear Park vision and is as follows:

"Recommendations: B. Gateway Hub

These comments relate to Table 2-23 and 2-24, and Figure 2-29, and the accompanying text:

- The Gateway Hub proposed standards still have not taken into account strong public recommendations to consider L Street as part of a linear park, or to retain L Street as a pedestrian and cycle oriented corridor, rather than as part of an L/K Street one-way vehicular couplet. The Planning Commission and City Council SHOULD incorporate design standards appropriate to an L-Street linear park and pedestrian / bicycle corridor alternative.

The Arcata Transportation Safety Committee recommended, again, at their May 16, 2023, meeting as follows: Chair Dave Ryan and other members of the Committee took mere seconds to reinforce what they have clearly stated as their firm position on the couplet concept for L Street: They are against it and feel it has no place in the modern design of Arcata's streets and traffic patterns. "Make the priority to improve L Street as a people corridor." And as written over the existing language in the 2045 General Plan draft, **"Removal of couplet in favor of a linear park through the L St corridor."**

Thanks again for all your donated time and effort with all the current planning efforts. I hope you are able to glean some positive ideas and values from my correspondence. Feel free to reach out if you have any comments or would like any further discussion

Regards-

Chris Richards

Arcata Business Owner and Resident

Mads Odom

From: James Becker <james_bckr@yahoo.com>
Sent: Wednesday, June 14, 2023 4:01 PM
To: Scott Davies; Judith Mayer; Matthew Simmons; Dan Tangney; Joel Yodowitz; Peter Lehman; Delo Freitas; David Loya
Cc: Kimberley White; Sarah Schaefer; Meredith Matthews
Subject: Public comment excluded in draft plan/Community nconsidered below Planning Commision should be reflective of the majority of the Community first and foremost. Statistically valid survey
Attachments: Gateway-Concerns--Solutions-10-25-22.pdf

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Hello

City of Arcata Planning Commissioner's, Community Development Director, and Senior Planner I'm writing you in response to the action taken by the Planning Commissioners ,on June 13, completely dismissing enhanced upper story setbacks.

This concept is included in the Gateway Form Based Code Draft. Page 23 and 24 I assume this option was presented by Ben Noble to address issues brought up at both previous Planning Commission meetings and Form Base code Community engagements.

It offers a solution to address Solar Shading of existing neighborhoods.

Enhanced upper story setbacks represents a starting point.

If goal is to not penalize a developer who only builds 4 stories, then begin the step backs at 4 stories and/or define a clear distance to height ratio that take into account the suns angle at a given time of year.

Since the policy must be objective, decide on acceptable maximum of what can be remedied.

If solar shading issues can not be addressed through step backs, then include a community benefit that benefits the entire neighborhood: A greater setback that offers open space to the neighborhood.

I welcome any comments or thoughts on my recommendation To completely disregard this concept is to ignore community concerns.

For this reason, I've included the three page document that reminds the Commissioners consider community concerns.

Thanks

James Becker

Sent from my iPhone

Specific Concern Solutions
 Planning Commission Decision
 PC Top Concerns
 Reference

			Expert
Public comment excluded in draft plan/Community considered below			
Planning Commission should be reflective of the majority of the Community first and foremost.			
Statistically valid survey			
Form Based Code	x		Delo/Ben
Form-based Code - Design Standards		https://www.cityofaracata.org/964/Frequently-Asked-Questions	
Active recreation open spaces	x	https://www.youtube.com/watch?v=bkt2XaYGB1k&list=PL7TmQ3MmkA5qJHW0ypCUBOfCtLuxzjD&index=26	Jen/Emily
Community Benefits Program		FBC	
Imp-GA-6.3 Public Space Acquisition Program		Gateway Plan	
Height and Shading, Views	x	FBC	Delo/Ben
Setbacks and step-backs		Design Chapter	
GA-9f Solar Shading	x		Joe M/Netra
Parking			
FBC - Parking standards		FBC	
Alternative Transportation Infrastructure		GP Circulation Element/Gateway Plan	
Node based parking structures		FBC	
Accessibility	x	FBC	Netra/Delo
ADA plus			
Updated Policy language		Updated language in Parks, Circulation, and Design Chapters	
Gentrification/Housing Affordability	x		David/Jen
FBC Inclusionary Zoning - Lower Income Housing		FBC	
Community Benefits Program - Affordable housing		FBC/Housing Element	
City Housing and Grants Division		Implementation Measure	
		https://www.youtube.com/watch?v=bkt2XaYGB1k&list=PL7TmQ3MmkA5qJHW0ypCUBOfCtLuxzjD&index=26	
Impacts on Creamery District/building	x		Delo
Form-based Code - emphasis on Creamery		Arts and Design Chapters, Housing and Land Use Chapters	
Imp GA-3.3 AND 3.3, Resident and Business		Implementation of Gateway Plan	
Relocation Assistance			
Artist live/work space			
Effect on businesses	x		Jen
IMP-GA-1.2 Relocation Assistance			
Fiscal Impacts	X		Delo/David
IMP-GA-11.2 Infrastructure Financing		Infrastructure chapter of GAP, CIP Planning	
Tsunami/Storm Surge	x		Emily/David
Continued adherence to FEMA standards			
Lack of Diversity in Design	x		Delo/Ben
Form Based Code-Design Standards		https://www.cityofaracata.org/964/Frequently-Asked-Questions	
Construction impacts	x		
EIR			

Specific Concern Solutions
PC Top Concerns
Planning Commission Decision
Reference

	Expert
Existing BMPs in Muni Code	
Land acquisition	
Community Benefits Program	
Design standards limiting housing production	
Form Based Code-Design Standards	
Bring wiyot into the discussion	
Updated GAP Policy	

x

Imp-GA-6.3

GA-30, GA-5d, GA-6n



Mads Odom

From: Wendy Ring <wring123@gmail.com>
Sent: Friday, June 16, 2023 3:13 PM
To: COM DEV
Subject: Comment on Gateway Plan

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I am commenting as a private citizen, not as a member of the city's TSC. I strongly support Gateway District development as a walkable, bikeable, mixed use area that increases the city's supply of housing but am disappointed at the anemic inclusionary housing provisions which would make this new area an enclave for the privileged. A vibrant community requires mixed incomes as well as mixed uses.

I do support the plan's requirement for a percentage of affordable units. This should not simply be an optional "community benefit" to be rewarded with additional building height because [California's Density Bonus Law already does that](#). But the requirement needs to be high enough to be more than a gesture. When I hear the word Gateway I imagine a grand archway open to everyone, but a comparison of the plan's inclusionary requirements with those of other jurisdictions in the [CA Inclusionary Housing Searchable Database](#) makes me think more of a gated community.

According to the factsheet [Meeting California's Needs: Best Practices for Inclusionary Housing](#) from the Western Center on Law and Poverty, the average percentage of affordable units required in city and county ordinances is 15%, compared with 3% in the current plan. Most jurisdictions start their requirements at project sizes greater than 5 units, not 30, so developers won't develop 29 units to evade the rules. Alternative options like in lieu fees must be provided in accordance with state law and can be used by developers of small projects. If we can't be leaders in this space, at least let's not be laggards.

Over the years I've worked hard to help patients who are disabled and homeless obtain benefits and it's been disheartening to see them still living in the bushes on SSI because they still can't find housing within their means. I've also seen many talented young people who were contributing to our community leave because they couldn't afford housing. COVID has made us aware of how essential essential workers really are. Low income, and certainly moderate income, as defined in the housing world, includes people who are essential to our community like teachers, bus drivers, people who work in our health facilities, and employees of nonprofits just to name a few.

With local developments like Cal Poly, offshore wind, the trans Pacific data cable, and other projects attracting and climate change driving people to our area, Arcata will not have to lowball its affordable housing requirements to attract developers. While I don't want to see the Gateway plan drag out, the affordability provisions need more community discussion and research.

Thanks,

Wendy Ring MD, MPH

*Stories of climate action from the bottom up
with [Cool Solutions Podcast](#)*