Draft EIR Document - Table of Contents and Annotations

DEIR version 20240126 January 26, 2024

This Table of Contents is not complete. It may contain typos or errors. Please feel free to contact the author if you spot any errors.
It contains both objective listings and quotes from the draft EIR, and observations, opinions, and notes.
This will be updated -- this is not a final document. You can use Ctl-F or Cmd-F to Find words and phrases.

		PDF page number	PDF page number within the appendix or section	Document page
2.1	Project Background	35		2.0-1
2.2	Purpose and Need	35		2.0-1
2.3	Goals and Objectives	36		2.0-2
2.3.1	General Plan Objectives	36		2.0-2
2.3.2	Gateway Area Plan Objectives	37		2.0-3
2.4	General Plan Assumptions	37		2.0-3
	Population	38		2.0-4
	Image 2-1 Population Growth Scenarios	38		2.0-4
	Table 2.4-1. Population Scenarios with Various Average Annual Growth Rates	39		2.0-5
2.5.2	Neighborhood Centers and Employment Areas	43		2.0-9
	Infill Opportunity Zones	44		2.0-10
	Gateway Area Opportunity Zone	44		2.0-10
	"The Gateway Area is planned to provide approximately 500 new units to the City's housing stock over the planning period."			
	Valley West Opportunity Zone	44		2.0-10
	NOTE: Listed as 33.9 acres.			
	"However, the vacant and underutilized lands within the Valley West Opportunity Zone provide far greater development potential than current and proposed zoning would allow. The Valley West commercial areas have significant redevelopment potential for both housing and economic opportunities. While the specific visioning and land use proposals for the area have not been initiated, this Draft EIR anticipates potential minimum development at the proposed Residential High Density. The Valley West Area is near Carlson Park, the City's only access to the Mad River, other residential high and medium density existing neighborhoods, and largely transportationoriented shopping and services. In particular, the Valley West shopping center has approximately 8 acres of underdeveloped property that could substantially add to both housing and resident-based retail and services lacking in the area now."			
	Craftsman's Mall / St. Louis Opportunity Zone	45		2.0-11
	NOTE: Does not mention the Cal Poly dorms. **Says this OpZone is 41.8 acres.**			
	Downtown Opportunity Zone	45		2.0-11
2.6	The Proposed Plan	45		2.0-11
	Table 2.6-1 General Plan 2045 Overview and Organization	46		2.0-12
	[NOTE: Shows Arcata Community Vision as a Minor Update.]			
2.6.1	Gateway Area Plan Element			
	Gateway Barrel District – [G-B	47		2.0-13
	Image 2-2: Gateway-Barrel District Illustrative Plan	48		2.0-14
	NOTE: Shows 1500 dwelling units, 150,000 sq.ft. commercial, parking at 1.25 per DU, 5 per 1,000 sq.ft. commericial			
	This equals 1875 residental and 750 commerical spaces.			
	Gateway Hub- [G-H]	48		2.0-14
	Gateway Corridor – [G-C]	48		2.0-14
	Gateway Neighborhood – [G-N]	48		2.0-14
	Table 2.6-2 Development Standards for Base Level Projects and Community Benefit Projects			
	Community Benefits Bonus Tiers	49		2.0-15
2.6.2	Land Use Element	50		2.0-16
	Table 2.6-3 Proposed Density Changes Summary	51		2.0-17
	Gateway Area Opportunity Zone	52		2.0-18
	Valley West Opportunity Zone	52		2.0-18
	Craftsman's Mall / St. Louis Opportunity Zone	52		2.0-18
Important	**"This area will likely take longer to have a significant impact on housing...."** **-- The EIR is Ignoring the CalPoly dorms.**			

		PDF page number	PDF page number within the appendix or section	Document page
	"The specific visioning has not been initiated in this Infill Opportunity Zone, but this Draft EIR **anticipates potential minimum development** at Residential High and Medium Densities."			
	Downtown Opportunity Zone	53		2.0-19
	Westwood / Sunset Neighborhood Center	53		2.0-19
	Sunny Brae Neighborhood Center	53		2.0-19
	Commercial-Mixed zone of up to 50 dwelling units per acre (previously 15 dwelling units per acre). No modifications to the number of parcels zoned for commercial / mixed use is proposed.			
	West End / Aldergrove Employment Center			
	Samoa Boulevard and South G Street Employment Center			
	Gateway Area - **DUPLICATION**	54		2.0-20
Duplication - Typo	NOTE: The Gateway area is shown twice in this list of opportunity zones -- as the first area on the list on page 2.0-18 (PDF page 52), and as the last area on page 2.0-20 (PDF page 54).			
2.6.3	Circulation and Mobility Element	54		2.0-20
2.6.4	Public Facilities and Infrastructure Element			
	"Modifications and upgrades to citywide facilities to accommodate demand (e.g., City Hall, public facilities / libraries, community and neighborhood centers)."			
2.6.5	Parks and Recreation Element	55		2.0-21
2.6.6	Health Element	55		2.0-21
2.6.7	Minor Updates	56		2.0-22
	Design Element	56		2.0-22
	Historic Preservation Element	57		2.0-23
	Public Safety Element	57		2.0-23
	Includes police, fire protection, emergency services, etc.			
	Open Space Element	57		2.0-23
	Resource Conservation and Management Element	57		2.0-23
	Growth Management Element	58		2.0-24
	Noise Element	58		2.0-24
	"As such, changes to the Element goals, policies, and related implementation measures proposed in the General Plan 2045 are not anticipated to significantly impact the environment."			
	Air Quality Element	59		2.0-25
2.7	Future Zoning Amendments	59		2.0-25
2.8	**General Plan Buildout Projections**	59		2.0-25
	Theoretical Buildout	59		2.0-25
	Projected 2045 General Plan Buildout	60		2.0-26
	The projected development is informed by the City's historic and forecasted housing needs and development demands, as discussed in Section 2.4 (General Plan Assumptions). This approach is consistent with CEQA requirements that an EIR evaluate 'reasonably foreseeable' direct and indirect physical changes in the environment that may be caused by the project. **Changes to the environment that are speculative or unlikely to occur are not considered 'reasonably foreseeable'.**			
2.9	Environmental Protection Actions Incorporated into the Project	60		2.0-26
2.10	Uses of the EIR and Required Agency Approvals	62		2.0-28
2.11	AB 52 and SB 18 Consultation	63		2.0-29
2.12	References	64		2.0-30
	NOTE: References include:			
	City of Arcata. 2023. Draft Arcata General Plan Population Growth Calculator, version 2. Unpublished. Community Development Department.			

		PDF page number	PDF page number within the appendix or section	Document page
	NOTE: That is not a reference -- this is not available to the public.			
Figure 2-1	City of Arcata Planning Areas	65		After 2.0-30
Figure 2-2	General Plan Use Designations within the Gateway Area	66		After 2.0-30
Figure 2-3a	Existing Zoning and Infill Opportunity Zones	67		After 2.0-30
Figure 2-3b	Proposed Zoning and Infill Opportunity Zones	68		After 2.0-30
3.0	**Community Environment**	69		3.0-1
3.1	Introduction	69		3.0-1
3.2	Aesthetics	70		3.2-1
3.2.3	Regulatory Framework	72		3.2-3
	Includes GP 2020 Design Element Policies D-1 through D-7			
	Policy OS-1: Overall Open Space System	16 pages		
	Proposed GP 2045 Design Element Policies D1 - D7			
	Arcata Local Coastal Program (date not shown) policies K1 and K5	87		3.2-18
3.2.5	Methodology	88		3.2-19
View impact	Visual changes and associated effects of the development scenario within the Gateway Area were demonstrated by identifying visual resources (viewsheds) before and after implementation of the proposed development scenarios. The primary viewshed considered comprises views from the Wildberries parking lot facing towards Humboldt Bay, which is where the Gateway Area Infill Opportunity Zone is located. **Potential visual impacts associated with the development scenario involving multi-story buildings were also evaluated.**			
	NOTE: Evaluation was done with 4 multi-story buildings, only one of which was in the Barrel District. The Gateway Area Plan could involve a potential of 10, 20, or more multi-story buildings.			
3.2.6	Impacts and Mitigation Measures	88		3.2-19
View impact	**"Impact AES-a: Would adoption and implementation of the General Plan 2045 have a substantial adverse effect on a scenic vista?"**			
False Statement	"Figures 3.2-1 (A&B), and 3.2-2 (A&B) **depict what a full build out scenario in the Gateway Area could look like** from two locations located at the top of the hill."	88		3.2-19
	NOTE: This is NOT a full build-out scenario. It shows a total of FOUR buildings.			
	Image 3.2-1. Existing View of Southbound H Street	90		3.2-21
	Image 3.2-2. Existing View of Southbound K Street	91		3.2-22
	Image 3.2-3. Existing View of Northwest Bound Samoa Blvd	92		3.2-23
	Remaining Study Area	92		3.2-23
False Statement	"Development outside of the Infill Opportunity Zones is not anticipated to be substantially different from existing development."			
	"Therefore, **development outside of the Gateway Area is anticipated to resemble existing development and it is unlikely that future proposed development under the General Plan 2045 outside the Gateway Area would adversely affect a scenic vista.** A less than significant impact would occur."			
	NOTE: The Implementation Measures that are designed to re-zone existing Residential Low Density neighborhoods of Bayview, Sunset, Northtown, and Arcata Heights -- to be Residential High Density -- are in fact included in the General Plan 2045 document.			
	"Impact AES-b: Would adoption and implementation of the General Plan substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?"			3.2-24

		PDF page number	PDF page number within the appendix or section	Document page
3.2.7	Cumulative Impacts	95		3.2-26
Figure 3.2-1a	View of Arcata Plaza – Looking South from H Street – 10-ft above ground	96		
Figure 3.2-1b	View of Arcata Plaza – Looking South from H Street – 100-ft above ground	97		
Figure 3.2-2a	View of Gateway Area – Looking South from K Street – 10-ft above ground	98		
Figure 3.2-2b	**View of Gateway Area – Looking South from K Street – 100-ft above ground**	99		
Figure 3.2-3a	View of Gateway Area – Looking Northwest from Samoa Blvd – 10-ft above ground	100		
Figure 3.2-3b	**View of Gateway Area – Looking Northwest from Samoa Blvd – 100-ft above gro**	101		
3.3	Air Quality	102		3.3-1
	There were no actual tests done -- just an evaluation of what is expected.			
3.4	Cultural Resources	121		3.4-1
	"the following 17 sites within the Gateway Area are recommended to be subject to applicable citywide preservation policy:"	122		3.4-2
	Policy H-4: Neighborhood Conservation Areas (NCAs) and Specific Plans Districts (SPDs) Objective. Designate the Central Arcata, Arcata Heights, Bayview, and Bayside areas as Neighborhood Conservation Areas and assure that new construction, modifications or alterations of noteworthy structures, and significant changes to other structures are harmonious with the existing character of these neighborhoods.			3.4-10
	To date, the City has not designated Bayside as an NCA, nor has it prepared a specific plan for the Bayside Specific Plan District.			
	"Implementation of the General Plan 2045 has the potential to result in the physical demolition, destruction, relocation, or alteration of known historical resources within the study area (City limits).			3.4-19
3.5	Greenhouse Gas Emissions	143		3.5-1
3.6	Hazards and Hazardous Materials	175		3.6-1
	Table 3.6-3. Listed Gateway Area Sites and Status	179		3.6-5
	Sites within the Gateway Area with a recorded hazardous substance occurrence			
	Fire Hazards	183		3.6-9
	NOTE: This consists of a single paragraph that has very little content.			
Figure 3.6-1	City of Arcata Geo Tracker – Cleanup Sites	202		After 3.6-27
3.7	Land Use and Planning			
	Table 3.7-1: Land Use Plan Categories and Acreages in 2020	203		3.7-1
	Table 3.7-2: Land Use Plan Categories and Acreages, GP 2045	205		3.7-3
	This table shows the Gateway districts as Land Use Designations G-C, G-B, G-H, G-N, and G-OS.			
	It does not show the Gateway area as Commercial Mixed Use.			
3.8	**Noise**	216		3.8-1
	NOTE: No actual noise testing / survey was done.			
	Relies upon a noise survey done in 1997. We don't have that data, only contour maps that were created in 2000-2003 from that data.			
	What is shown are modeling projectiions that are based on 20-year-old other modeling projections, that were then based on real data. In other words, what we are seeing are theoretical projections that are based upon a previous set of theoretical projections. The original data is not referenced.			
	Existing Noise and Vibration Environment within the Study Area	219		3.8-4
	"A community noise survey conducted in 1997 as part of background studies for the General Plan 2020 showed that typical noise levels in noise-sensitive areas of the City ranged from 46 dB to 63 dB Ldn."			

		PDF page number	PDF page number within the appendix or section	Document page
	"Traffic volumes are generally assumed to be higher in present-day compared to 1997 due to population growth within the City. For reference, the population grew approximately 24% from 1990 to 2020 (U.S. Census 1992, 2022) "			
	"Based on projected 2020 noise contours presented in the General Plan 2020, noise survey results referenced above, and actual population growth in the City, existing road traffic noise levels within the City are estimated to be generally in the range of 50 dB to 65 dB Ldn. At locations in close proximity to major roads and highways there is potential for existing noise levels exceeding 65 dB Ldn."	220		3.8-5
	Existing Noise and Vibration Environment within the Gateway Area and Downtown Area	220		3.8-5
	"At this time, it is not known if any of these facilities produce noise levels exceeding the standards set out in Table 3-2 of the Land Use Code (Table 3.8-5 of this Draft EIR)."			
	Existing Noise and Vibration Environment within Remaining Infill Opportunity Zones	220		3.8-5
	"At this time, it is not known if any of these facilities produce noise levels exceeding the standards set out in Table 3-2 of the Land Use Code (Table 3.8-5 of this Draft EIR)."			
	"Based on **projected 2020 noise contours** presented in the General Plan 2020, noise survey results referenced above, and actual population growth in the City, existing road traffic noise levels within the City **are estimated to be generally in the range of 50 dB to 65 dB Ldn**. At locations in close proximity to major roads and highways there is potential for existing noise levels exceeding 65 dB Ldn."	220		3.8-5
	NOTE: The problem is with peak noise -- not average noise. Loud vehicles at sleeping hours. Being woken up by noise is a public health issue. This is recognized by the EPA as a human health issue.			
Noise level surveys and measurements are required.	"N-3b: Transportation noise. Transportation noise sources **shall be periodically measured**, and significant increases mitigated, so as not to exceed the levels specified in Table N-2 for outdoor activity areas or interior spaces of existing receptors. (Table N-2 is shown below as Table 3.8-6)."	224		3.8-9
	NOTE: The last actual measurements appear to have taken place in 1997 -- that is, 27 years ago.			
	Table 3.8-5. Maximum Allowable Stationary Noise Level by Receiving Land Use (Table 3-2 of the Land Use Code)			
	NOTE: Shows 75 dB as a maximum in lodging -- this is far too high.	226		3.8-11
	Table 3.8-6. Maximum Allowable Transportation Noise Exposure (Table 3-3 of the Land Use Code)			
	The City of Arcata Land Use Code addresses noise in the Downtown Plaza Area in Title IV – Public Welfare, Morals and Conduct, Chapter 3 (City of Arcata 1996). While Chapter 3 does not apply directly to the Gateway Area, the requirements are provided below for reference: **Section 4320 Exterior Noise in General** (Plaza only)	228		3.8-13
	Policies in the Proposed General Plan 2045 relating to noise resources in the Noise Element include:	229		3.8-14
	Policy N-3: Transportation Noise Sources and Levels	230		3.8-15
	Policy N-5: Intrusive and Intermittent Noise Sources	231		3.8-16

		PDF page number	PDF page number within the appendix or section	Document page
	~~Approximately 42 percent of dwelling units are estimated to occur within the Infill~~ Opportunity Zones, 36 percent of **dwelling units** are to be provided by Cal Poly Humboldt, and 22 percent of dwelling units would occur within the remaining study area. Additionally, these assumptions include the following: – Housing Element Vacant Parcels – 351 units – Accessory Dwelling Units and Small Lot Splits – 400 units – Gateway Area (Infill Opportunity Zone) – 500 units – All Other Infill Opportunity Zones – 1,340 units – Redevelopment Infill – 200 units – Cal Poly Humboldt Campus Housing – 1,550 units"			
	"Cal Poly plans to develop and maintain housing to **accommodate approximately 50 percent** of its planned 2030 resident student population."			
Incorrect figures shown	NOTE: This EIR shows: Gateway as 500 units. All other Infill Opportunity Zones 1,340 units. **It is not considered possible to have 1,340 units built on the land that is available on the three other Infill Opportunity Zones.** See notes on this.			
Incorrect figures shown	NOTE: Shows Cal Poly Humboldt Campus Housing as 1,550 **units**. Should be: 1,550 net additional dorm **beds.**			
	Employment	246		3.9-3
3.9.3	State and Local Regulations	246		3.9-3
	General Plan 2020 policies on Housing	249		3.9-6
	General Plan 2045 policies on Housing	255		3.9-12
	Proposed City of Arcata General Plan 2045 Gateway Area Plan on Housing	260		3.9-17
3.9.6	Impacts and Mitigation Measures	263		3.9-20
3.9.7	Cumulative Impacts	267		3.9-24
3.10	Public Services and Recreation	268		3.10-1
	"Public services evaluated include fire protection, police protection, schools, parks and recreation, and other public facilities."			
3.10.2	Fire Protection within the Study Area	268		3.10-1
	Schools within the Study Area	270		3.10-3
	Parks within the Study Area	272		3.10-5
	Table 3.10-5: Comparison of Parkland Area in Arcata in the Year 2010 Based on the Parks & Recreation Master Plan and in 2023	273		3.10-6
This table does not contain current or accurate information. **This table does not support the text.**	NOTE: This table is not the proper table to have here. The table shows a "Change in Acres" of Natural Areas as -3,6215 acres (that is, a loss) and then has a footnote to explain "*Note: Negative changes in acres are due to recategorization of parkland types since the adoption of the Parks & Recreation Master Plan in 2010, not a loss of parkland. Overall, a net gain in parkland occurred between 2010 and 2023." We can believe that is true, but that is not what this table shows. A footnote is not sufficient. We need to see a table with valid information. A table included here should contain data that supports the text of the draft EIR. This table does not support the text of the draft EIR. It should be replaced with one that does.			
	Parks within the Infill Opportunity Zones	273		3.10-6
	NOTE: Shows parks as 0.25 miles from an EDGE of zone border -- not from the population centers of the infill zones. Shows "as the crow flies" distance, not actual street walking/driving distances.			
	NOTE: 0.25 miles is a little less than 4-1/2 Arcata city blocks (300 feet per block).			

		PDF page number	PDF page number within the appendix or section	Document page
	Parks within the Gateway Area	273		3.10-6
False Statement	**"Approximately 10 parks are located within 0.25 miles from the Gateway Area."**			
	NOTE: Within 0.25 miles of EDGES of the Gateway area -- the very borders, not from where most of the residents will actually live -- it appears that there are **THREE** city parks: The Plaza, Stewart Park, Shay Park. From a creative viewpoint, there could be 3 additional city parks that might theoretically be added to the list: The Arcata Ball Park (not considered a publicly accessible open park), Bloomfield Park, and the Arcata Community Park. From the very westernmost edge of the Gateway area to Bloomfield Park is under 0.25 miles, as the crow flies. To walk there, however, that would mean walking right through the middle of the Cypress Grove Chevre property and right through the middle of their building. In other words, saying that it is 0.25 miles is an impossibility. Tto actually get there is farther. From the very easternmost corner at 5th and F Streets -- that tip of the extension of the Gateway area that runs for 4 blocks along Samoa Boulevard, from J to F -- it is less than 0.25 miles to the very westernmost edge of the Arcata Community Park -- that is, west of the baseball fields, to the trees and vegetation along Highway 101. That's if you could climb over two fences and walk across Hiway 101. To get there as a human being from 5th and F Streets, it's about a half-mile. From the Creamery Building to the Community Center is about 0.8 miles walking/biking (on the pathway) or 1.2 miles driving.			
	Other Park Resources	274		3.10-7
	Other Public Facilities within the Study Area	274		3.10-7
3.10.3	Regulatory Framework	275		3.10-8
3.10.4	Evaluation Criteria and Significance Thresholds	307		3.10-40
3.10.6	Impacts and Mitigation Measures	308		3.10-41
	Discussion on maintaining acceptable service ratios, response times or otherperforma	308		3.10-41
	Table 3.10-7: NFPA 1710 Deployment Models and Common Local Deployment Strate	309		3.10-42
	Police Protection	311		3.10-44
	The growth anticipated in the General Plan 2045 could potentially result in the need for new or expanded police protection facilities. It is expected that new facilities would be located within infill or previously developed areas within the City limits. Environmental impacts of constructing and operating the facilities would likely be similar to those identified in this EIR associated with new development and infill projects. As such, impacts associated with the adoption and implementation of General Plan 2045 to police protection services would be less than significant. Mitigation Measures: No mitigation is necessary Level of Significance: Less than significant impact			
	Schools: "However, with an estimated 700-1,200 new kindergarten through twelfth grade students over the planning horizon, it is likely that new or expanded school facilities or staff within the City would be needed."	313		3.10-46
Cannot be evaluated, so is less than significant ?	"The location and extent of new or expanded facilities to serve additional students in is not known at this time. Therefore, the significance of physical impacts on the environment that could result from the construction and operation of future school facilities **cannot be evaluated**."			
	Mitigation Measures: No mitigation is necessary Level of Significance: Less than significant			
	Parks	314		3.10-47
	This section completely ignores the need for LOCAL parks that can be walked to.			
	Public Facilities: City Hall and libraries	315		3.10-48

		PDF page number	PDF page number within the appendix or section	Document page
	Increase in park usage	316		3.10-49
	Expansion of recreational facilities	317		3.10-50
3.10.7	**Cumulative Impacts**	318		3.10-51
Disingenuous.	Fire Protection: "Cumulative projects could require the development of a new fire station if call volume and distribution change significantlydue to development patterns and population growth. The City and AFPD would continue to monitor annual callmetrics and plan for facilities as needed. **Cumulative impacts would be less than significant."**	319		3.10-52
Disingenuous.	Police: **"Projects considered for cumulative impacts would not contribute to increased calls for service within the City limits."**			
	"**Many of the considered projects are located outside the City limits and would not contribute to cumulatively significant impacts** to police protection services provided by APD. A less than significant impact would occur."			
Disingenuous.	These statements are not considered to be true. "Projects considered for cumulative impacts would not contribute to increased calls for service within the City limits. Impacts from housing projects are evaluated in this EIR." Yes -- that is exactly what this draft EIR is supposed to do -- to evaluate the impacts. This statement is self-referential. It is saying that that there are no impacts fro the housing projects because those impacts are evaluated.			
	Impact of CalPoly on public facilities: "Cal Poly Humboldt is expecting increased enrollment throughout the General Plan 2045 planning horizon, which would require the construction of new facilities on State-owned land. **Potential cumulative impacts would be addressed through Public Facility Element Policy PF-4c that requires the City to coordinate with Cal Poly Humboldt regarding their planned development."**			
Disingenuous.	The EIR states that PF-4c that "requires the City to coordinate with Cal Poly" will actually solve or mitigate the issues of 5,000 new students in Arcata. But to "coordinate" is not at all the ame thing as covering the impacts. This is considered an disingenuous statement. "Coordinate" does not mean that cumulative impacts are addressed -- only that they are discussed.			
	Parks: "Arcata currently has approximately **4,200 acres** of parkland. Development proposed by cumulative projects could increase the use of City parks, however Arcata would still maintain a high ratio of parks to population. Cumulative project development would not result in the need for new or expanded parks and recreation facilities. Therefore, cumulative impacts to parks and recreational facilities would be less than significant."			
	From 5th and K to the Redwood Park playground is about 1.5 miles, 36 minute walk.			
	From 5th and K to the Community Center playground is about 1.1 miles driving, 0.8 miles waliking, 20 minute walk.			
	This paragraph ignores the need for a local park.			
	By including Arcata's vast forests, the ratio of parks to population will always be high.			
	There are 4,100 acres of parkland in Arcata (not 4,200). Of that, 116.7 acres are Developed Parks.			

		PDF page number	PDF page number within the appendix or section	Document page
3.11	Tribal Cultural Resources	321		3.11-1
3.12	Utilities and Service Systems	329		3.12-1
	Wastewater	329		3.12-1
	Phase II upgrades have been envisioned to include construction of oxidation ditches and a secondary clarifier as a parallel treatment system within the core of the treatment facility. The potential implementation of Phase II will be evaluated after Phase I improvements are complete and treatment performance and regulatory compliance can be assessed. Concurrently the City is undergoing a feasibility study with technical assistance from the State Water Board to assess feasible alternatives for subsequent wastewater facility improvements while preparing for sea level rise beyond the design life of the Phase I improvements (2055). This multi-phase project is consistent with the proposed General Plan 2045.			
	CEQA does not require analysis of the impact of existing environmental conditions, such as sea level rise, on the future users or residents of a project, except when a project exacerbates an existing condition (CBIA v. BAAQMD, 2015). Implementation of the General Plan 2045 includes policy updates and proposed land use changes to accommodate the anticipated population growth over the planning horizon (to 2045) in tandem with the multi-phase wastewater treatment facility upgrades and other existing projects. As mentioned, **the City is undergoing a feasibility study to explore design alternatives and sea level rise planning beyond the existing multiphase wastewater treatment facility upgrades which has a design life to 2055.** Therefore, the potential impacts from implementation of the General Plan 2045 on sea level rise are not addressed in this Draft EIR because the Project would not produce wastewater in excess of what the system could accommodate and would not exacerbate the constraints of sea level rise on the wastewater treatment facility.			
	NOTE: Is that what the feasiblity stufy for Phase II is?			
	I was under the impression that if the feasibility study does not allow Phase II, then the issue is much closer timeframe than that.			
	Solid Waste	330		3.12-2
	Paragraph is not sufficiently detailed to indicate the cumulative effects of an addtional 7,500 people.			
3.12.6	Impacts and Mitigation Measures	343		3.12-15
	Would adoption and implementation of the General Plan require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electrical power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			
	Solid Waste issues	349		3.12-20
	"The City's population is anticipated to increase to up to 27,000 residents over the course of the planning horizon, which is an increase of approximately 8,143 people as compared to 2020 census data."			
	Mitigation Measures: No mitigation is necessary Level of Significance: Less than significant impact			
3.12.7	Cumulative Impacts	349		3.12-20

		PDF page number	PDF page number within the appendix or section	Document page
	"Soils within the Gateway and Downtown Area Infill Opportunity Zones The Gateway and Downtown Areas both have the marine terrace derived Timmons and Lepiol Soils and Lepoil Candymountain Complex Soils, which are relatively deep, well drained, sandy clay loams. The Gateway Area additionally contains: the silty clay loam and poorly drained Jollygiant soil in the central and northwestern portion (Gateway Hub); the gravelly to sandy loam moderately well drained Urban Land-Anthraltic Xerorthents Association Soils predominantly in the Gateway Barrel District and likely including an extensive modification of the site soils, including reworking of the upper soil horizons and **placement of a significant amount of imported fill**; and the salt marsh/bay derived peat to silty clay loam with very poorly drained Occidental Soil likely underneath portions of the southernmost Gateway Barrel District and all along both sides of Samoa Boulevard."			
	Regional Seismic Setting	462		5.4-3
	"The Cascadia Subduction Zone represents the most significant potential earthquake source in the north coast region. A great subduction event may rupture along 200 km or more of the coast from Cape Mendocino to British Columbia, may be up to magnitude 9.5, and could result in extensive tsunami inundation in low-lying coastal areas (Clarke 1992). The April 25, 1992 Petrolia earthquake (magnitude 7.1) appears to be the only historic earthquake involving slip along the subduction zone, but this event was confined to the southernmost portion of the fault. Paleoseismic studies along the subduction zone suggest that great earthquakes are generated along the zone **every 300 to 500 years**. Historic records from Japan describing a tsunami thought to have originated along the Cascadia Subduction Zone suggest **the most recent event occurred on January 27, 1700**. **A great subduction earthquake would generate long duration, very strong ground shaking throughout the north coast region.**"			
5.4.3	Regulatory Framework	463		5.4-4
5.4.6	Impacts and Mitigation Measures	471		5.4-12
	"Impact GEO-a.iii, a.iv, c, d: Would adoption and implementation of the General Plan 2045 directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving liquefaction, landslides, or otherwise unstable soils?"			
5.4.7	Cumulative Impacts	474		5.4-15
Figure 5.4-4	City of Arcata Infill Opportunity Zones NRCS Soils	477		After 5.4-17
	City of Arcata – NRCS Soils	478		After 5.4-17
	City of Arcata – California Geological Survey Alquist Priolo Zones & Potential Liquefac	479		After 5.4-17
	Slopes Greater than 15%	480		After 5.4-17
5.5	Hydrology and Water Quality	481		5.5-1
	Sea Level Rise			
NOTE: If the "vast majority" of the area is outside the projecte sea level rise area… what is	"The City has conducted vulnerability and risk assessments for sea level rise. Areas that are currently potentially vulnerable to 3.3 feet of sea level rise include natural resource, industrial, and residential areas south of Highway 255 as well as agricultural and some residential areas between Old Arcata Road and Highway 101 (Laird 2018a, 2018b). **The vast majority of the Gateway Area is well outside of sea level rise model predictions,** however under current conditions, 3.3 feet of sea level rise could reach very minor areas along the very southern edge of the Gateway Area and then only during high tides. The Valley West, Craftsman Mall, and Downtown Infill Opportunity Zones are not vulnerable to 3.3 feet of sea level rise."			

		PDF page number	PDF page number within the appendix or section	Document page
the area (the minority) that is INSIDE?	NOTE: The phrase "The vast majority of the Gateway Area is well outside of sea level rise model predictions" is a very odd choice of words. The vast majority? Does that imply that there are some areas that are NOT outside of the sea level rise model predictions?			
5.5.3	Regulatory Framework	484		5.5-4
5.5.4	Methodology	510		5.5-30
	"**Development is currently allowed in areas that are, according to City Sea Level Rise Vulnerability and Risk Analysis (Anderson, Sea Level Rise in the Humboldt Bay Region, 2018; Laird, City of Arcata Sea Level Rise Vulnerability Assessment, 2018), vulnerable to sea level rise.** Increased density will be allowed in the Infill Opportunity Zones, none of which are within vulnerable areas during the General Plan 2045 planning horizon. **Projected to occur after the planning horizon, 3.3 feet of sea level rise could reach very minor areas along the very southern edge of the Gateway Area during high tides.** These areas are associated with Jolly Giant Creek and already developed. **Parcels adjacent to Jolly Giant Creek are subject to creek setbacks, preventing additional development that could cause sea level rise related impacts.** None of the development allowed under the General Plan 2045 would exacerbate sea level rise within the areas that are vulnerable to 3.3 feet of sea level rise, therefore sea level rise is not discussed further in this analysis."			
	NOTE: No mention of rising groundwater in this draft EIR.			
	NOTE: No mention of king tide / storm events.			
5.5.6	Impacts and Mitigation Measures	511		5.5-30
5.5.7	Cumulative Impacts	515		5.5-35
5.5.8	References	516		5.5-36
	Aldaron Laird. **2018**. City of Arcata Sea Level Rise Vulnerability Assessment.			
	Anderson Jeff (North Hydrology and Engineering). **2018**. Sea Level Rise in the Humboldt Bay Region			
	NOTE: No more recent references are available?			
Figure 5.5-1	City of Arcata FEMA Floodplains	517		After 5.5-36
Figure 5.5-2	Tsunami Zones	518		After 5.5-36
5.6	Mineral Resources	519		5.6-1
5.7	Wildfire	522		5.7-1
Figure 5.7-1	Local and State Responsibility Area - Fire Hazard Severity Zones	540		After 5.7-16
Figure 5.7-2	State Responsibility Area - Fire Hazard Severity Zones - Proposed November 21, 2022	541		After 5.7-16
6.0	**Energy Conservation**			
6.1	Introduction	542		6-1
6.2	Energy	543		6-2
6.2.3	Regulatory Framework	543		6-2
6.2.6	Impacts and Mitigation Measures	562		6.2-20
6.2.7	Cumulative Impacts	563		6.2-21
7.0	**Alternatives Analysis**	565		7.0-1
7.1	Introduction	565		7.0-1
7.1.2	Identifying Project Alternatives	566		7-2
7.2	Alternatives Considered but Rejected	567		7-3
7.2.1	Rejected Alternative A: Development in Hillsides and/or Arcata Bottoms (Urban Sprav	567		7-3
7.2.2	Rejected Alternative B: Four Story Alternative	567		7-3

		PDF page number	PDF page number within the appendix or section	Document page
7.2.3	Rejected Alternative C: Infill Agricultural Sites	568		7-4
	NOTE: I do not consider A or C to be actual viable alternatives, as they have been consistently ruled out by the City.			
	B says:			
	The potential for meeting the City's residential development needs is lower with this alternative. In addition, this alternative is effectively the same as the reduced population alternative. For these reasons, this alternative was rejected from further study.			
7.3.1	**Alternative 1: No Project**	568		7-4
	"As discussed in Section 3.2.4, **under the proposed Project some public views would be modified by Project development allowable in the Gateway Area, predominantly when looking down on the Gateway Area from the hillside to the east**. However, unlike the proposed Project, the No Project Alternative would not propose a Gateway Area Plan and associated design features within that Infill Opportunity Zone. Therefore, the impacts to aesthetics would be less than significant and **would be slightly less under the No Project Alternative.**			
7.3.2	**Alternative 2: Upzoning Single-Family Zoning Districts (Dispersed Development)**	574		7-10
	"The General Plan 2045 anticipates approximately 22% of population growth in the plan period to occur in single-family zoning districts. These projections include anticipated accessory dwelling unit production associated with SB 9 (2021), both of which would allow up to four units on each existing single-family parcel. Enabling this increase in density, also known as "upzoning," on these properties could increase the development potential across the City resulting in less reliance on higher-density projects in the Infill Opportunity Zones. The General Plan 2045 anticipates approximately 42% of units (46% of the population growth) to occur within Infill Opportunity Zones."			
Any validation to this?	NOTE: Has the City done any studies to see how many parcels would be candidates for either ADUs (one study) or more than one unit on a parcel (a separate study)? The large majority of single-family homes are placed on their parcels in such a way as to not allow a second, third, or fourth unit to be built -- or undesirable to be built -- because of closeness to property lines, existing structures, etc. Without an actual survey, it is incorrect to include the number of 22%. If there is no basis, then it is only a supposition, not a figure that can be validated.			
7.3.3	**Alternative 3: Reduced Population Estimate**	579		7-15
	"The scale of growth is in large part predicated on the policies that direct development to accommodate the growth."			
	"An alternative to the proposed 1.0% to 1.4% average annual growth rate is to reduce growth estimates and impose reductions in reduced development potential."			
	NOTE: The proposal is for 1.4% average, which is 40% growth over 20 years. The proposal is not for range of 1.0 to 1.4%. The growth estimates are based on 1.4%.			

Figure Index

		PDF page number	PDF page number within the appendix or section	Document page
	Letter from James Becker, with attachments from 2016 actions	638 - 647	36	
	Letter from Aaron DeBruyn	648	46	
	Letter from Diane Ryerson	649	47	Not redacted
Appendix C	**CalEEMod Output**	651	1	
	[California Emissions Estimator Model]			
	Arcata General Plan 2045 - Gateway Only Custom Report	652	2	
	Land Use Types [Shows qty of housing]	658	8	
	500 apartments "Mid Rise" on 13.2 acres, with 1.0 square feet of landscaping			
	Population: 1,180			
	39,700 of commercial space			
	1.60 acres of "City Park" - 62,726 sq.ft.			
What is the source of these numbers?	Arcata General Plan 2045 - Remaining Infill Custom Report	698	48	
	Land Use Types [Shows qty of housing]	704	54	
	"Apartments Low Rise" 1,358 units, on 84.9 acres with 1.00 sq.ft. of landscaping. 3,056 population.			
	Average 16 dwelling units per acre.			
	Single Family Housing, 333 dwelling units, 108 acres, with 3,900,381 sq.ft. of landscaping (89.54 acres)			
	749 population. Average 3.08 dwelling units per acre.			
	"Apartments Low Rise" 2,150 units, on 134 acres with 1.00 sq.ft. of landscaping. 4,838 population.			
	Shown as "Cal Poly Housing" -- but that is not "low rise." Craftsman Mall is mid-rise.			
	Average 16 dwelling units per acre.			
	Total population: 8,643			
	Note: The General Plan does not call for 333 single family homes on 108 acres, or 2,150 apartments on 108 acres.			
What is the source of these numbers?	**Where do these figures come from?**			
Appendix D	**Historic Resource Analysis**	741	1	
	Gateway Area Historic Resources Inventory -- Gerald Takano	742	2	
	Review Procedure and Criteria for accepting “Potentially Historic Resources” into the record and for inclusion in the General Plan, as appropriate	759	19	
	Adopted July 27, 2022. 2 pages.			
Missing information	**There is no historic resource inventory of the General Plan area.**			
Missing information	**There is no historic resource analysis.**			

		PDF page number	PDF page number within the appendix or section	Document page
Appendix E	**Environmental Database Review data**	761	1	
	Certified Sanborn (R) Map Report	762	2	
	This Certified Sanborn Map Report is based upon Sanborn Fire Insurance map sheets.	764	4	
	NOTE: This is a map report for the Gateway area ONLY -- not for the General Plan area.			
	Further, it is a map report for only a relatiely small PORTION of the Gateway area -- not the entire Gateway area at all.			
	There are 7 maps in total. The area shown is centered around 7th to 10th Streets, K to N Streets.			
	Each map shows an area of portions of about 6 or so city blocks -- that is, they are detailed and do not show much area.			
	The total area shown is very small.			
	For instance, the four historic "Devlin Cottages" (located on 7th Street, between K and L Streets, to the north of the current AmeriGas site) appear on **six of the seven** maps.			
	Aerial Photographs of the Gateway area	773	13	
	NOTE: These are aerial photographs of the Gateway area ONLY -- not for the General Plan area.			
	Environmental Data Resources, Inc. (EDR) Aerial Photo Decade Package is a screening tool designed to assist environmental professionals in evaluating potential liability on a target property resulting from past activities. EDR's professional researchers provide digitally reproduced historical aerial photographs, and when available, provide one photo per decade.			
	Includes aerial photos from: 2016, 2012, 2009, 2005, 1993, 1989, 1983, 1974, 1972, 1969, 1957, 1954, and 1941.			
	Aerial			
	The EDR-City Directory Image Report	788 - 849	28	
	Environmental Data Resources, Inc.'s (EDR) City Directory Report is a screening tool designed to assist environmental professionals in evaluating potential liability on a target property resulting from past activities.			
	Shows SMALL PORTIONS of directories for: 2017. 2014, 2010, 2005, 2000, 1995, 1992, 1982, 1977, 1972, 1968, 1964, 1958.			
	NOTE: This is a street directory for a very small portion of the General Plan area.			
	The directories shown are centered around 9th Street from 900 to the 1300 blocks (roughly I to N Streets); 10th Street from the 900 block to the 1600 block (roughly I to Q Streets; and L Street from 700 to 1300 blocks (7th to 13th).			
	The total area shown is very small.			
	But the entries show are often just a few actual listings per block -- that is, the entries might be a small portion of what was on th			
Very limited data. Value is questionable.	**What is the purpose of such a small sampling of Arcata's directory?**			
	What is shown is perhaps 25% of the businesses/persons on the blocks shown.			
	In total, this is less than 1% of the businesses / persons in Arcata.			
	Historical Topo Map Report	850	90	
	Centered on the GATEWAY area only. From Environmental Data Resources.			
	Utilizes source topo maps from 2018, 2015, 2012, 1972, 1959, 1951, 1947, 1942, and 1933.			
	Total of 9 topo maps			
	Environmental Records - for the Gateway area only	864	104	

		PDF page number	PDF page number within the appendix or section	Document page
	Search conducted by Environmental Data Resources			
	Executive Summary	866	106	
	Mapped Sites Summary - A list of the site names and addresses	867	107	
	Lists of state and tribal leaking storage tanks	881	121	
	Cleanup Program Sites (CPS; also known as Site Cleanups [SC] and formerly known as Spills, Leaks, Investigations, and Cleanups [SLIC] sites)	887	127	
	Overview Map of environmental records sites of the Gateway area	910	150	
Important	Detail Map of environmental records sites of the Gateway area	911	151	
	NOTE: These are maps of points that have records of environmental inquiries. It is NOT a map of what might be considered spots of potential environmental issues that are yet to be found, or might be anticipated. As an example, locations where there once were "teepee burners" are known areas to look for toxic residue. Those locations are not on these maps.			
	Details of environmental records - Map Findings Summary	912 - 916	152	
	This is a summary of the environmental reports that are on the map.			
	Map Findings	917 - 1812	157	
	This is a listing of the details of the environmental reports that are on the map.	About 896 pages		
	Listing of government records searched	1813 - 1865	1053	
	Physical setting source addendum	1866	1106	
	Physical setting source summary	1867 - 1875	1107	
	Physical setting source **map**	1876	1116	
	Physical setting source map findings	1877 - 1930	1117	
	Physical setting source map findings - Radon	1931	1171	
	Physical setting source records searched	1932 - 1934	1172	
Appendix F	**Noise Study Technical Memo**	1935	1	
	20 pages. For the General Plan area, including the Gateway area.			
	1. Introduction. One-half page	1936	2	1
	2. Noise & Vibration – Environmental and Regulatory Setting	1936	2	1
	2.1 Fundamentals of Acoustics	1936	2	1
	2.2 Fundamentals of Ground-borne Vibration	1938	4	3
	2.3 Federal Regulatory Framework	1939	5	4
	2.4 State Regulatory Framework	1940	6	5
	2.5 Local Regulatory Framework - City of Arcata Land Use Code	1941	7	6
	Table 6 Maximum Allowable Transportation Noise Exposure (Table 3-3 of the Municipal Code)	1942	8	7
	Calls for maximum allowable noise for residential outside activity areas at 60 dBA Ldn.			
	2.5.2 Proposed Amendments to the Land Use Code	1945	11	10
	3. Existing Noise Conditions in Arcata	1945	11	10
	3.1 Existing Transportation Noise Sources	1946	12	11
	3.2 Existing Non-Transportation Stationary Noise Sources	1946	12	11
	3.3 Construction Noise	1947	13	12
	3.4 Ground-borne Vibration	1947	13	12
	4. Noise and Vibration – Standards of Significance	1948	14	13
	"Exposure of persons to or generation of noise levels in excess of standards established in the local generalplan or noise ordinar			
	4.1 Permanent Transportation Noise Exposure, Land Use Compatibility, and Mit	1948	14	13

		PDF page number	PDF page number within the appendix or section	Document page
	"The primary source of noise from automobiles is high frequency tire noise, which increases with speed. In addition, trucks and automobiles produce engine and exhaust noise (audibly dominant over tire noise at low speeds), as well as wind noise."			
	Projected growth during the General Plan Update planning period (up to 2045) is expected to result in development of noise-sensitive uses in the Gateway Area where noise levels may exceed applicable standards for sensitive interior and outdoor areas. Transportation noise levels exceeding standards contained in Table 6 of this report would represent a significant impact."			
IMPORTANT	"Thus, for potential developments where exterior road traffic sound levels exceed the indoor sound level criteria of Table 6 by more than 10 dBA (rounded down from 12 dBA), **central air conditioning systems will be required to allow occupants to close their windows to achieve acceptable indoor noise levels**."			
	NOTE: This draft EIR report says that central WILL be required if indoor sound levels are greater than 10dBA above the levles in Table 6 -- which is 45 DBA Ldn for residential uses. That is, in interior levels are above 55 dBA.			
	Table 8 Setback Distances to Noise Prediction Thresholds	1949	15	14
IMPORTANT	NOTE: This table shows that to achieve a noise level of under 60 dBA Ldn -- as required by Table 6, above -- would be a setback of >= 550 feet from K Street, >=250 ft from 11th Street.			
	This would be a setback from K Street of almost 2 city blocks.			
	Mitigation Measures: "For any planned sensitive uses within the corresponding roadway setbacks, and dependent on the proximity to the roads, **measures including central air conditioning,** acoustic barriers for Outdoor Activity Areas, and/or upgraded building exterior construction **shall be required.** Level of Significance: Less than significant with appropriate mitigation where necessary.			
	4.2 Permanent Non-Transportation Stationary Noise Exposure, Impacts, and Mitigatic	1950	16	15
	4.3 Temporary Ground-Borne Vibration Exposure, Impacts, and Mitigation Measures	1952	18	17
	5. Summary and Conclusions	1953	19	18
	"Mitigation measures for developments located in heightened acoustic conditions have been recommended to ensure compliance with the existing Municipal Code sound level exposure limits, and include central air conditioning, acoustic barriers, and/or upgraded building exterior construction."			
	6. References	1954	20	19
	Includes: City of Arcata. 2008. Arcata General Plan: 2020, Noise Element. Arcata, CA			
	Figure 1 Noise Study - City of Arcata General Plan Update Road source Location Pl	1955	21	
	Map Date: 5/4/2023 Created by GHD			
IMPORTANT	Figure 2 Noise Study - City of Arcata General Plan Update Transportation Noise Contour - 2045 Traffic Noise	1956	22	
	Map Date: 5/4/2023 Created by GHD			
	A version of this 2045 Traffic Noise map can be found in the draft General Plan 2045 Noise Element on page 5.			
	https://www.cityofarcata.org/DocumentCenter/View/13798/62_Noise_20231212-Final			

		PDF page number	PDF page number within the appendix or section	Document page
	NOTE: It is assumed that no new measurements were collected for this contour map -- that it is a continuation of previous projections, and based on a variety of assumtions.			
	The GP 2045 may has a Map Date of 9/2/5/2023.			
	This contour map shows the western section of the Gateway area at 55-60. Everything else is noisier. Most of Arcata is at 60-65. The swath from H Street on the downtown side of US 101 to A Street on the west side of US 101 is shown as 65-70, with areas nearer to US 101 shown as 70 to 80.			
	These figures are HIGHER than the maximums shown in Table 6, on page 1942.			
	NOTE: The data for existing transportation noise sources is based on a community noise survey conducted in 1997, as part of background studies for the General Plan 2020 that came out in the year 2020. It also is based on projections made at that time (2000) about projected noise contours that would be expected in twenty years future -- in 2020. That is, this current study is based on actual noise readings from 1997, and then from projects from those 1997 studies about how things might be 23 years from that time. **There were no new actual noise readings done for this 2024 study -- it all relies on noise readings from 1997, which were then "modeled" to provide figures for the current time.**			
	"**Based on projected 2020 noise contours** presented in the Arcata General Plan: 2020 as well as the noise survey results referenced above [1997], GHD estimates that existing road traffic noise levels within the City are generally in the range of 50 dB to 65 dB Ldn. At locations in close proximity to major roads and highways there is potential for existing noise levels exceeding 65 dB Ldn."			
	NOTE: The Projected 2020 noise contour map may be found at:			
	https://www.cityofarcata.org/DocumentCenter/View/9072/Figure-N-b-Projected-Noise-Contours			
	It is shown on page 6-25 of the General Plan 2020 Noise Element. (There appears to be no page 6-26)			
	https://www.cityofarcata.org/DocumentCenter/View/39/Chapter-6-Health-and-Safety---2-Noise-Element-PDF			
	These noise contours are based upon the buildout of the Land-Use Plan.			
	It shows levels exceeding 65 Decibels along the complete length of K Street and Alliance Road.			
	Also, exceeding 65 Decibels along a proposed arterial L Street.			
	The traffic on a proposed L Street is currently (and in the future) carried on K Street.			
	Thus, the K Street traffic noise would consist of that noise that was projected for K Street AND for the proposed L Street.			
	This projected 2020 noise contour map also shows levels above 55 Decibels for the entire north-south length of Arcata, bounded by: Union Street / Spring Street on the east and M Street on the west, including areas to the east of Alliance Boulevard for the section north of 18th Street.			
	NOTE: The figures on the 2000 noise contour map are listed in "Decibels."			
	We can assume that this is "A weighted" so that it would be dBA units.			
	The figures used in the draft EIR are "Ldn" units. This is a weighted average of day and night measurements.			
	There is no indication that there have been any night measurements.			

		PDF page number	PDF page number within the appendix or section	Document page
	Further, the Ldn units are AVERAGES. The EPA considers noise levels that are disruptive to human living as based on PEAK noise levels.			
	As an example, a loud motorcycle or car with a modified muffler system might drive on a city street at 1 AM, and expose you to a peak sound for a duration of just 10 seconds. This would not show up on an average sound level basis -- but it certainly would disturb the sleep of many residents.			
	In 1972, U.S. Congress passed the Noise Control Act.			
	"The Congress declares that it is the policy of the United States to promote an environment for all Americans free from noise that jeopardizes their health or welfare."			
	In 1974, the Environmental Protection Agency (EPA) published noise levels that the agency had argued were requisite to protect public health under the act. Additionally, the levels were issued to provide guidelines for state and local governments in setting standards. The EPA set a 24-hour exposure level of 70 decibels as the level that would prevent measurable hearing loss in individuals over a lifetime. Further, **the EPA set a level of 55 decibels outdoors and 45 decibels indoors as the levels at which individuals would not experience annoyance or activity interference.**			
Appendix G	Vehicle Miles Traveled Analysis	1957	1	
	NOTE: I find the modeling methods used in the VMT analyses to be based on multiple levels of assumptions, and as such are of reduced value.			
	See "Destinations" -- based on car trips that are over 16 miles long.			
	Trips over 16 miles was used in the study in Sacramento. For Arcata, to designate a trip length of 16 miles as a standard would not be considered as a valid point of reference.			
	The model is self-referential, it seems at first reading.			
Appendix G includes:				
	These are not in the Contents figures list, as these figures are in an appendix.			
	Figure 1: Overview of Methodology	1964	8	7
	Figure 2: Jobs/Housing Diversity Score vs Share of Work Trips That Are Under 1/2 M	1965	9	8
	Figure 3: Retail/Housing Diversity Score vs Share of Shopping Trips That Are Under	1966	10	9
	Figure 4: Percentage of Trips Under 1/2 Mile by Walking and Biking	1967	11	10
	NOTE: This figure contains misleading and possibly false information -- check into this.			
	It shows biking as being perhaps 1/20th of the trips of walking -- without specifying the distance of the trip.			
	Poor logic.			
	Figure 7: Distribution of Existing Households by Hex Zone	1971	15	
	Figure 8: Distribution of Existing Retail/ServiceJobs by Hex Zone [Misspelled Title]	1972	16	
	Figure 9: Distribution of Existing Non-Retail/ServiceJobs by Hex Zone	1973	17	
	Figure 10: Distribution of Existing Total Trips by Hex Zone	1974	18	
3.1.5.1	Jobs/Housing Diversity			
	NOTE: This is based on the completely unsupported assumption that there should be 1 job per housing unit -- is this the methodology?			
	This is 30 pages of a meaningless self-referential discussion.			
	The source data is not shown -- just the names of the sources.			
	Very suspect. In my view, this is opinion, not fact.			

		PDF page number	PDF page number within the appendix or section	Document page
# Notes on Sea Level Rise				
40 instances of "sea level rise"				
1 instance of "emerging ground water" -- in a letter in the Notice of Preparation section, page 650.				
	NOTE: No mention of rising groundwater in this draft EIR.			
	NOTE: No mention of king tide / storm events.			
	CEQA does not require analysis of the impact of existing environmental conditions, such as sea level rise, on the future users or residents of a project, except when a project exacerbates an existing condition (CBIA v. BAAQMD, 2015). Implementation of the General Plan 2045 includes policy updates and proposed land use changes to accommodate the anticipated population growth over the planning horizon (to 2045) in tandem with the multi-phase wastewater treatment facility upgrades and other existing projects. **As mentioned, the City is undergoing a feasibility study to explore design alternatives and sea level rise planning beyond the existing multiphase wastewater treatment facility upgrades which has a design life to 2055.** Therefore, the potential impacts from implementation of the General Plan 2045 on sea level rise are not addressed in this Draft EIR because the Project would not produce wastewater in excess of what the system could accommodate and would not exacerbate the constraints of sea level rise on the wastewater treatment facility.	330		
NOTE: If the "vast majority" of the area is outside the projecte sea level rise area… what is the area (the minority) that is INSIDE?	The City has conducted vulnerability and risk assessments for sea level rise. Areas that are currently potentially vulnerable to 3.3 feet of sea level rise include natural resource, industrial, and residential areas south of Highway 255 as well as agricultural and some residential areas between Old Arcata Road and Highway 101 (Laird 2018a, 2018b). **The vast majority of the Gateway Area is well outside of sea level rise model predictions**, however under current conditions, 3.3 feet of sea level rise could reach very minor areas along the very southern edge of the Gateway Area and then only during high tides. The Valley West, Craftsman Mall, and Downtown Infill Opportunity Zones are not vulnerable to 3.3 feet of sea level rise.	483		
	Development is currently allowed in areas that are, according to City Sea Level Rise Vulnerability and Risk Analysis (Anderson, Sea Level Rise in the Humboldt Bay Region, 2018; Laird, City of Arcata Sea Level Rise Vulnerability Assessment, 2018), vulnerable to sea level rise. Increased density will be allowed in the Infill Opportunity Zones, none of which are within vulnerable areas during the General Plan 2045 planning horizon. Projected to occur after the planning horizon, 3.3 feet of sea level rise could reach very minor areas along the very southern edge of the Gateway Area during high tides. These areas are associated with Jolly Giant Creek and already developed. Parcels adjacent to Jolly Giant Creek are subject to creek setbacks, preventing additional development that could cause sea level rise related impacts. None of the development allowed under the General Plan 2045 would exacerbate sea level rise within the areas that are vulnerable to 3.3 feet of sea level rise, therefore sea level rise is not discussed further in this analysis.	510		