CITY of EUREKA

NOTICE OF PLANNING COMMISSION AND CITY COUNCIL PUBLIC HEARING

CITY OF EUREKA 2019-27 HOUSING ELEMENT UPDATE

NOTICE IS HEREBY GIVEN THAT THE CITY OF EUREKA PLANNING COMMISSION WILL HOLD A PUBLIC HEARING ON MONDAY, NOVEMBER 13, 2019, AT 5:00 P.M. IN THE COUNCIL CHAMBER, SECOND FLOOR, EUREKA CITY HALL, 531 "K" STREET, EUREKA, CALIFORNIA, TO CONSIDER AND RECOMMEND ACTION TO THE CITY COUNCIL ON THE EUREKA HOUSING ELEMENT UPDATE.

NOTICE IS ALSO HEREBY GIVEN THAT THE EUREKA CITY COUNCIL WILL HOLD A PUBLIC HEARING ON TUESDAY, NOVEMBER 19, 2019, AT 6:00 P.M. IN THE COUNCIL CHAMBER, SECOND FLOOR, EUREKA CITY HALL, 531 "K" STREET, EUREKA, CALIFORNIA, TO CONSIDER AND ADOPT THE EUREKA HOUSING ELEMENT UPDATE.

The City of Eureka is proposing a comprehensive update to the Eureka Housing Element. The Housing Element is a required element of the Eureka General Plan, and is being updated for the 6th Regional Housing Needs (RHNA) Cycle. The planning horizon for the 6th Cycle Housing Element is August 31, 2019 to August 31, 2027 (8 years).

The City of Eureka, as Lead Agency, prepared the City of Eureka 2040 General Plan Update Program EIR (State Clearinghouse #2016102025) in compliance with CEQA. The EIR consists of the Notice of Preparation, the Draft EIR including technical appendices, the Responses to Comments, Final Corrections and Additions, and the Project Findings and Statement of Overriding Considerations. The City of Eureka 2040 General Plan EIR was adopted by the City Council on October 15, 2018, at the same time the 2040 General Plan was adopted.

Pursuant to Section 21166 of CEQA and Section 15162 of the CEQA Guidelines, a subsequent EIR is required only when certain conditions are met. The Housing Element Update does not meet any of these conditions. Therefore, an Addendum to the General Plan Program EIR has been prepared. The Environmental Impact Report Addendum analyzes the potential direct, indirect, and/or cumulative environmental impacts. It verifies that the updated Housing Element will not result in additional impacts or increase the severity of impacts beyond those identified in the General Plan EIR. The Addendum, along with the adopted EIR will be considered by the City Council at the November 19, 2019 public hearing described above.

The draft Housing Element and associated documents are available for review in the Development Services Department, City Hall third floor, 531 K Street, Eureka, or on the City's website at:

https://www.ci.eureka.ca.gov/depts/development_services/public_hearing_notices.asp

All interested persons are invited to comment on the draft Housing Element Update either in person at the scheduled public hearing, or in writing. Written comments on the draft Housing Element Update may be submitted at the hearing, or prior to the hearing by mailing or delivering them to the

Community Development Division of the Development Services Department, 531 “K” Street, Eureka, CA 95501; or by emailing them to bheaton@ci.eureka.ca.gov

CITY OF EUREKA
DEVELOPMENT SERVICES DEPARTMENT
Brian Gerving, Interim Director
Community Development Division
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EUREKA CITY PLANNING COMMISSION

STAFF REPORT
November 13, 2019

PROJECT TITLE: City of Eureka Housing Element Update

PROJECT APPLICANT: City of Eureka

CASE NO.: GP-18-0001

APPLICABILITY: Citywide

PROJECT DESCRIPTION: The City of Eureka is proposing a comprehensive update to the Eureka Housing Element. The Housing Element is a required element of the Eureka General Plan, and is being updated for the 6th Regional Housing Needs (RHNA) Cycle. The planning horizon for the 6th Cycle Housing Element is August 31, 2019 to August 31, 2027 (8 years).

STAFF CONTACT PERSON: Brian Heaton AICP, Senior Planner, City of Eureka, Development Services Department, Community Development Division; 531 "K" Street, Eureka, CA 95501-1165; phone: (707) 441-4160, email: bheaton@ci.eureka.ca.gov

STAFF RECOMMENDATION AND SUGGESTED MOTION:
Adopt a Planning Commission Resolution transmitting the Planning Commission's recommendation to the City Council to:

a) Accept the Housing Element Addendum to the General Plan Environmental Impact Report; and
b) Adopt the updated Eureka Housing Element.

"I move the Planning Commission adopt a Resolution transmitting to the City Council the Commission's recommendation to certify the Housing Element Addendum to the General Plan Environmental Impact Report, to adopt the updated Eureka Housing Element."

BACKGROUND – GENERAL PLAN: In 2012, the City of Eureka began the process of updating the City's General Plan. On October 15, 2018, that process was completed when the City adopted the Eureka 2040 General Plan. California Government Code Section 65300 et seq. directs that all cities and counties in the state adopt a comprehensive planning document, called the general plan. The general plan provides guidance to local government decision-makers regarding the conservation of resources and the future physical form and character of development for the

jurisdiction. The General Plan is the official local government statement regarding the extent and types of development of land and infrastructure that will achieve the community's physical, economic, social, and environmental goals. A general plan expresses a city or county's goals and articulates its intentions with respect to the rights and expectations of the public, property owners, community interest groups, prospective investors, and business interests. Although the general plan consists of individual sections, or "elements," that address specific areas of concern, it also embodies a comprehensive and integrated planning approach for the jurisdiction.

BACKGROUND – HOUSING ELEMENT: The Housing Element is a required element of the General Plan that provides housing-related policy direction to a community. Like other elements of the General Plan, it is implemented by local land use regulations contained primary in the Eureka Municipal Code (e.g. Chapter 155 ZONING REGULATIONS). Unique among required General Plan elements, Housing Elements are required to be updated at regular intervals set by the state. The intervals, known as "cycles", represent individual planning horizons and are connected to the Regional Housing Needs Allocation (RHNA). The draft Housing Element has been prepared for the 6th RHNA cycle which corresponds to the years 2019-2027 (8 years). The previous cycle ran from 2014-2019.

The purpose of the Housing Element to provide for the identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. The housing element must identify adequate sites for housing, including rental housing, factory-built housing, mobile homes, and emergency shelters, and shall make adequate provision for the existing and projected needs of all economic segments of the community. In order to provide all of the data and analysis required by law, Housing Elements tend to me long documents. They provide both broad goals and policies as well is very specific actions that will be taken to achieve community aims.

HOUSING ELEMENT STRUCTURE: The Housing Element consists of the following two parts:

Housing Plan. The housing plan contains goals, policies, and implementation programs. Goals are broad ambitions, policies provide direction, and implementation programs provide contain specific actions to be taken. Additionally, this housing plan contains a set of strategies that inform the broad intent and philosophical underpinnings of the plan.

Technical Appendix. The technical appendix contains a wealth of demographic and housing-related data (e.g. number of elderly people) that inform and inspire the goals, policies, and implementation programs contained in the housing plan. The Technical Appendix also contains data that verifies that City policy and regulations are consistent with state law. As California continues to passing housing related legislation, the requirements continue to change. Additionally, the technical appendix contains an inventory of sites able to accommodate housing as well as the rationale for the inclusion of these sites.

ENVIRONMENTAL IMPACT REPORT (EIR) AND ENVIRONMENTAL IMPACT REPORT ADDENDUM:

An EIR is an informational document to provide the public and decision-makers with information on the environmental effects of proposed actions. The EIR evaluates the direct physical environmental effects that may occur through the implementation of the City of Eureka 2040 General Plan as well as the indirect physical effects. This is based on "significance thresholds" adopted or accepted by agencies or by the City that serve as benchmarks for determining if a component action will result in a significant adverse environmental impact.

The City of Eureka prepared the City of Eureka 2040 General Plan Update Program EIR (State Clearinghouse #2016102025) in its capacity as lead agency under CEQA and in compliance with CEQA. The EIR consists of the Notice of Preparation, the Draft EIR including technical appendices, the Responses to Comments, Final Corrections and Additions, and the Project Findings and Statement of Overriding Considerations. The City of Eureka 2040 General Plan EIR was certified by City Council on October 15, 2018, at the same time the General Plan was adopted.

Pursuant to Section 21166 of CEQA and Section 15162 of the CEQA Guidelines, a subsequent EIR is required only when certain conditions are met. The Housing Element Update does not meet any of these conditions. Therefore, an Addendum to the General Plan Program EIR has been prepared. The Environmental Impact Report Addendum analyzes the potential direct, indirect, and/or cumulative environmental impacts. It verifies that the updated Housing Element will not result in additional impacts or increase the severity of impacts beyond those identified in the General Plan EIR.

The Environmental Impact Report Addendum analyzes the potential direct, indirect and cumulative environmental impacts on the following issues. It verifies that the updated Housing Element will not result in additional impacts or increase the severity of impacts beyond those identified in the General Plan EIR:

- Aesthetics and Visual Resources
- Agriculture and Timber Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology, Soils, and Mineral Resources
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise and Vibration
- Public Services and Recreation
- Transportation
- Utilities and Services Systems
- Wildfire

<u>Tribal Consultation</u>

In accordance with Senate Bill 18 (SB 18) and Government Code 69352.3, the City of Eureka requested a list of Tribal Organization contacts from the Native American Heritage Commission in December 2014. The City of Eureka extended an invitation to the Wiyot, Blue Lake Rancheria, and Bear River Band of the Rohnerville Rancheria Tribes to consult on the General Plan Update. All three tribes indicated they would like to consult. City staff met with representatives of the three tribes on February 14, 2017. Members of the tribes subsequently provided input on proposed General Plan goals and policies pertaining to the management and protection of cultural resources. As documented in EIR Addendum, adoption of the draft Housing Element will not result in new impacts or impacts more severe than those identified and addressed in the General Plan EIR.

KEY SECTIONS HOUSING ELEMENT: Due to the extensive nature of the Housing Element, which is 161 pages combined, the staff recommends directing your attention to the following sections. They represent the core strategies and actions of the plan.

Housing Plan – 5 Strategies (Pages 1-10):

- Strategy 1: **Maximize Development Potential of the Few Remaining Vacant and Underutilized Sites**
- Strategy 2: **Accessory Dwelling Units**
- Strategy 3: **Internal Conversions**
- Strategy 4: **Small-Lot Subdivisions and Conservation Subdivisions**
- Strategy 5: **Geographically-Dispersed Affordable Housing through Affordable-by-Design Incentives and Local Density Bonuses**

Housing Plan – 7 Goals and 77 Policies (Pages 12-25:

- Goal 1: **Eureka's development regulations, permit processing procedures, and customer service standards are development-friendly and conducive to the production of housing.**

- Goal 2: **The City government actively facilitates the creation of a range of new affordable and market rate housing units to accommodate future growth and to address the needs of all socioeconomic segments of the community.**

- Goal 3: **Owner-occupied affordable housing is among the mix of housing types created in Eureka.**

- Goal 4: **All neighborhoods are clean and safe, while all levels and types of housing units throughout Eureka are consistently maintained at a high level of quality and integrity.**

- Goal 5: **Existing affordable housing units are retained and preserved, while displacement from housing is minimized.**

- Goal 6: **All residents of Eureka have equal access to housing options.**

- Goal 7: **The rate of homeless in Eureka is substantially lower than it has been in the past.**

Housing Plan – 35 Implementation Programs (Pages 26-65)

- Each Implementation Program consists of the following 3 parts:
  - Summary paragraph
  - List of specific actions to be taken
  - Timeframe, responsible parties, and funding source

Technical Appendix – Residential Site Inventory (Pages 74-88):

1. Residential Site Inventory contains two parts, each corresponding to a different method of determining the capacity of the city to receive additional housing units:
   - **Part 1: Non-Site Specific.** Non-site specific allocations refer to those which are not associated with a specific site. This is because by the nature of the housing type, it is impossible to predict the exact location where the housing will be built. For example, it is impossible to predict exactly which properties will see the creation of an ADU between 2019 and 2027. As ADU creation is a critical element of the City's housing creation strategy, it was important that its contribution to the housing creation targets be understood and documented. The methodology for estimating housing creation potential is explained for each of the three non-site specific housing creation methods:
     - Accessory Dwelling Units (ADU)
     - Small/Conservation Subdivisions
     - Division/Conversion of Existing Space
   - **Part 2: Site Specific**. Site specific allocations are those in which a specific number of housing units (with affordability level specified) can be attached to a specific site. A site can take the form of a single parcel, or a cluster of parcels if they are under common ownership and are contiguous. As required by state law, these sites are further broken down into vacant and non-vacant parcels. Each site contains a methodology summary that explains why it is appropriate for development and why the number of units allocated to it is achievable.

<u>Consistency with General Plan</u>

State law requires that a Housing Element and General Plan be "internally consistent". This means that no language in either document can be in conflict, rather each should be mutually supportive. Eureka is in a unique position among communities in that the 2040 General Plan was adopted just 10 months ago and the Zoning Code just 3 months ago. Because these planning efforts have overlapped to such an extent, they have served to inspire and inform ideas across plans. For example, some of the regulatory reform called for in the draft Housing Element has already been incorporated into the Zoning Code and is actively in use. Many of the goals and policies in the Housing Element were inspired by similar ideas in other elements of the General Plan. For example, General Plan Land Use policies LU-1.10, LU-1.17, and LU-1.18 all relate to parking policy refinement. In the Housing Element, policy H.1.7 relates to parking policy refinement in the context of housing.

The General Plan elements most related to housing are Land Use and Circulation (Also called transportation). The follow is a consistency analysis of these two elements in relation to the draft Housing Element:

Land Use: (pages 43-66 of the General Plan)

2. LU-1.3 Beneficial Development calls for "varied housing choices". H-1.12 Diverse Housing Development options calls out in the greater detail the diverse housing types to be implemented.
3. LU-1.6 Flexible Zoning calls for performance-based concessions and flexibility provisions, while LU-1.21 calls for development regulations to be monitored so that they don't create barriers to development. H-1.1 Flexible and Accommodating Regulations directs the City continually evaluate and modify development regulations to remove barriers to housing creation.
4. Land Use policies LU-1.10, LU-1.17, and LU-1.18 all relate to parking policy, drawing attention to the serious risk that inappropriate parking regulations pose to development. Housing Element Policy H-1.7 calls for optimized parking requirements for housing development.
5. Land Use policies LU-5.1, LU-5.3, and LU-5.4 call for housing to be created at a range of densities and for high density development to be encouraged near jobs and major transportation corridors. Housing Element policies H-1.9, H-2.3, H-2.4, H-2.5 all relate to the creation of dense housing creation.

In summary, after careful review of all Land Use policies contained in the 2040 General Plan relative to the draft Housing Element, no conflicts have been noted.

Mobility: (pages 139-153 of the General Plan)

6. M-1.2, M1.3, and M1.6 all call for investment in alternative travel modes such as public transit and the integration of transportation and land use decisions. Housing Element policies H-2.2 and H-6.6 likewise call for residential development to be accessible by and designed in relation to transit.
7. Goal M-3 calls for a wide-range of Pedestrian and Bicyclist related actions. Housing Element policies H-1.9 and H-6.5 call for bicycle parking requirements/encouragement and the integration of bicycle and pedestrian connectivity into residential developments.

In summary, after careful review of all Mobility policies contained in the 2040 General Plan relative to the draft Housing Element, no conflicts have been noted.

Other General Plan Elements:
Consistency analysis was performed on the other General Plan elements such as Economy, Parks and Recreation, etc.. No conflicts were noted in these elements.

Consultation with local Native American Tribes (SB 18)

SB 18 (Chapter 905, Statutes of 2004) requires cities and counties to contact, and consult with California Native American tribes prior to amending or adopting any general plan or specific plan,

or designating land as open space. Since the Housing Element is a part of the General Plan, updating the Housing Element is an amendment to the General Plan and consultation with the Tribes is required. Therefore, the City extended an invitation to the Chairpersons and THPO's (Tribal Historic Preservation Officer's) of the Blue Lake Rancheria Tribe of Indians, Bear River Band of Rohnerville Rancheria, and Wiyot Tribe to meet with the City to discuss any concerns or issues.

The draft Housing Element was sent to the Tribal Historic Preservation Officers who requested a list of sites from the Site Inventory. Staff supplied them with the list of sites. No additional consultation was requested of Staff by the THPOs, nor were any further comments received.

Public and Stakeholder Input on the Housing Element:

Housing Workshop (April 10, 2019): Approximately 200 members of the public attended. The 5 housing creation strategies were presented to the public at that time. Input gathered was used to refine the goals, policies, and implementation programs.

Stakeholder Outreach: The draft Housing Element was posted to the City website on July 29, 2019. All participants that left a legibly-written email address at the April 10th Housing Workshop were emailed to encourage them to comment on the draft Housing Element. Additionally, the draft Housing Element was emailed to the following stakeholders.

1. Affordable Homeless Housing Alternatives (AHHA)
2. Westside Community Improvement Association
3. True North Organizing Network
4. County of Humboldt - Department of Health and Human Services (DHHS)
5. Humboldt State University – Off-Campus Housing Liaison
6. College of the Redwoods – Special Programs
7. Legal Services of Northern California
8. Eureka City Schools
9. Real Property Management
10. Humboldt Property Management
11. Tribal Governments
12. Danco
13. Housing Humboldt
14. Eureka Housing Authority
15. RCAA

Housing Element Study Sessions: The contents of the draft Housing Element were explored a joint City Council/Planning Commission study sessions on October 1 and October 23. These study sessions included over 3 hours of detailed staff presentations, with specific attention paid to the Implementation Programs. All stakeholders (see above) were emailed invitations to attend. The general public was invited via City press release.

Written Public Comment Received: Written public comment was received from the follow persons/organizations. No comments were received verbally. A detailed accounting of all comments and responses can be found in Attachment 5 – Written Public Comment Matrix.

- Midge Catchling, Citizen
- Colin Fiske, Coalition for Responsible Transportation Priorities
- Aisha Cissna, Next Generation Eureka
- Leslie Castellano, Eureka City Council Person
- Janelle Egger, Citizen
- Gregory Holtz, Legal Services of Northern California
- Maggie Kraft, Area 1 Agency on Aging

Attachments:

Attachment 1 Planning Commission Resolution
Attachment 2 Housing Element - Housing Plan
Attachment 3 Housing Element - Technical Appendix
Attachment 4 Public Comment Matrix
Attachment 5 CEQA EIR Addendum
Attachment 6 Public Housing Workshop Results

RESOLUTION NO. 2019-

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF EUREKA RECOMMENDING THE CITY COUNCIL APPROVE AND ADOPT THE 2019-2027 HOUSING ELEMENT

WHEREAS, the City of Eureka adopted the Eureka 2040 General Plan on October 15, 2018; and

WHEREAS, a Housing Element is one of the seven mandatory elements which must be included in a general plan; and

WHEREAS, the City of Eureka's Housing Element is required by California state housing law to be updated every eight years (previously 5 years); and

WHEREAS*,* the City of Eureka has an adopted 2014-2019 Housing Element and has prepared an update of this Housing Element (draft 2019-2027 Housing Element), as required by state law, consisting of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement and development of housing in the City; and

WHEREAS, the draft 2019-2027 Housing Element has been posted on the City of Eureka's website since July 29, 2019, and a public housing workshop was held on April 10, 2019 to introduce proposed Housing Element content and gain public perspective on housing issues, the draft document has been sent to a number of housing housing-related organizations, and study sessions were held on October 1, 2019 and October 23, 2019.

The following findings of fact are based on information submitted with the permit application, agency comments, available records, public comment, and staff research and analysis.

FINDING 1: The draft 2019-2027 Housing Element is internally consistent with the 2040 Eureka General Plan. As documented in the staff report and required by state law, no language or proposed actions contained in the draft Housing Element are in conflict with the adopted 2040 Eureka General Plan.

FINDING 2: The adoption of the 2019-2027 Housing Element a "project" for the purposes of the California Environmental Quality Act (CEQA). Pursuant to Section 21166 of CEQA and Section 15162 of the CEQA Guidelines, a subsequent EIR is required only when certain conditions are met. The Housing Element update does not meet any of these conditions. Therefore, an Addendum to the General Plan Program EIR (State Clearinghouse #2016102025) has been prepared. The Addendum analyzes the potential direct, indirect, and/or cumulative environmental impacts which may result from implementation of the updated Housing Element. It verifies that proposed actions contained in the Housing Element will not result in additional impacts or increase the severity of impacts beyond those identified in the 2040 General Plan Update EIR. Therefore, the City of Eureka has determined that an Addendum to the certified General Plan Program EIR is the appropriate environmental document for the Housing Element project.

FINDING 3: Consultation with local Native American Tribes was performed consistent with SB 18 (Chapter 905, Statutes of 2004) regarding the draft 2019-2027 Housing Element, as documented in the staff report.

NOW THEREFORE, BE IT RESOLVED by the Planning Commission of the City of Eureka that the Commission recommend the Eureka City Council:

1. Consider the 2040 General Plan Program EIR and Addendum; and
2. Adopt the updated 2019-2027 Housing Element.

PASSED, APPROVED AND ADOPTED by the Planning Commission of the City of Eureka in the County of Humboldt, State of California, on the 13th day of November 2019 by the following vote:

AYES:
NOES:
ABSENT:
ABSTAIN:

_____
Jeff Ragan, Chair, Planning Commission

Attest:

_____
Brian Gerving, Executive Secretary

Housing

Introduction and Statutory Requirements

The Housing Element identifies the need for housing in the community as well as the City's strategy to address housing needs across a wide economic and social spectrum. The Housing Element is a mandated component of the City of Eureka 2040 General Plan and has been designed to satisfy the requirements of State law. Section 65583 of the California Government Code establishes the required components for a Housing Element.

The Housing Element consists of the following four sections: (1) Statutory Requirements; (2) Context and Strategies; (3) Goals and Policies; and (4) Housing Programs. The Technical Background Report (bound separately) provides a detailed assessment of the City's existing and projected housing needs, constraints, and opportunities for addressing those needs, and an evaluation of the City's achievements under the prior Housing Element.

This 6th cycle of the Housing Element update covers the planning period of December 31, 2018 through August 31, 2027. The Housing Element is designed to achieve the following objectives set forth in State law:

1. Identify adequate sites for a range of housing opportunities;
2. Assist in the development of adequate and affordable housing;
3. Address constraints to meeting the City's housing needs;
4. Conserve and improve the condition of housing; and
5. Promote housing opportunities for all persons

According to State planning law, the Housing Element must be consistent with other General Plan elements. While each of the elements is independent, the elements are also interrelated and complementary. Certain goals and policies of each element may also address issues that are primary subjects of other elements. This integration of issues throughout the General Plan creates a strong basis for the implementation of plans and programs and achievement of community goals. The Housing Element is most closely tied to the Land Use Element as residential development capacities established in the Land Use Element are incorporated into the Housing Element.

Bold Solutions

Context and Strategies

The City of Eureka is committed to taking whatever steps are necessary to address the housing needs of the community as well as to satisfy the requirements of State law. Yet, the City faces a significant challenge in the creation of housing: The City is largely built-out and there are relatively few sites that provide realistic opportunities for new development. Because of this challenge of limited development potential within city limits, the City has expended extraordinary effort to analyze the potential for annexation of undeveloped lands surrounding the City. The analysis was conducted by a consulting economist and land use specialist in 2017 as a component of the 2040 General Plan. The analysis definitively determined that annexation of surrounding lands for the purpose of stimulating new development was not a viable strategy due to unsurmountable geographic, ecological, and regulatory constraints. The geographic/ecological constraints include the waters of Humboldt Bay, coastal wetlands, and steep forested hillsides. Each of these constraints provide substantial physical and logistical challenges, but the most unsurmountable obstacle is that each of the geographic/ecological constraints come with regulatory barriers (such as the Coastal Act) that make development impossible. This puts Eureka in a unique position in the County of Humboldt. Most of the other nearby communities that are preparing housing elements have room to grow around their peripheries and many have room to grow internally.

Since annexation of new developable lands is not possible, and because the city is largely built-out with few developable sites remaining inside the city limits, Eureka needs a new set of realistic strategies designed to overcome these challenges and to stimulate the creation of new housing units across the economic and social spectrum of the city. Accordingly, this Housing Element represents a substantial evolution for Eureka. Through this document, the City of Eureka is committing to becoming a regional leader in developing realistic, effective, and innovative solutions to solving housing-related challenges and is committing to a series of proactive strategies that aim to address the needs of all socioeconomic segments of the community. These strategies acknowledge and embrace Eureka's unique position in Humboldt County as being one of the few places in which multi-story mixed use development and dense infill is possible. These strategies also acknowledge and accept that Eureka is unlikely to create a significant number of new single-family residential units via conventional single-family developments due to the City's largely built-out condition and geographic constraints.

The City cannot continue to adopt and implement post-WWII suburban housing strategies that rely on patterns of low-density sprawl. Such strategies simply cannot work in Eureka, even if the City desperately wanted them to. Yet, accepting these realities is relatively new for Eureka. Since the 1960s, the City's development regulations have favored low density, small buildings, segregation of uses, excessive parking spaces, large setbacks, large lots, and other development standards that hindered the development of housing. All of these constraints were adopted and promoted by the City despite the fact that the City's pre-WWII legacy development was based on a dense urban fabric with continuous city blocks and dense mixed-use multi-story buildings.

This Housing Element opens a new chapter for Eureka. Through considerable analysis and community engagement, the City has developed four specific strategies to stimulate the creation of housing. These strategies are unique in that they are explicitly based on the City's existing context and designed specifically to stimulate new housing in Eureka. The five strategies are:

1. Maximize Development Potential of the Few Remaining Vacant and Underutilized Sites
2. Accessory Dwelling Units (ADUs)
3. Internal Conversions
4. Small-lot Subdivisions and Conservation Subdivisions
5. Geographically-Dispersed Affordable Housing Through Affordable-by-Design Incentives and Local Density Bonuses

These strategies are the most realistic means of generating new housing in Eureka. There is effectively a zero percent probability of a new 50-unit

single-family residential subdivision in Eureka. However, as is demonstrated below, the probability of a new 50-unit five-story mixed use building is considerable. There is also a substantial chance that Eureka could see substantial growth in housing through the development of new ADUs and through internal conversions of existing buildings. The newly created allowances to create small-lot subdivisions and conservation subdivisions also will stimulate new housing units that would not have otherwise existed. Finally, the City's focused efforts to stimulate affordable housing geographically-dispersed throughout the City as a part of all multi-unit housing developments is a departure from the City's previous strategy of producing affordable housing primarily through large individual projects. These strategies are each based on actual existing conditions in Eureka, They are the most realistic means of generating new housing in the City, and will lead to a substantial increase in the annual number of housing units constructed as well as greatly improving the City's ability to address the needs of all socioeconomic segments of the community. Each strategy is described in detail below.

Strategy 1: Maximize Development Potential of the Few Remaining Vacant and Underutilized Sites

This strategy aims to allow and promote full build-out of all remaining vacant and underutilized sites in the City, across all zone districts. While there are very few such parcels available, those that do exist should be developed at their maximum densities. For the City to promote such an outcome is consistent with the City's historic legacy, but counter to the regulations and policies embraced by the City for the past 50 years.

With a population of around 27,000, Eureka is not a "big city." However, Eureka is the largest incorporated city in a five-county region (Del Norte, Trinity, Humboldt, Mendocino, and Lake). That region constitutes substantially more land area than the states of Connecticut, Massachusetts, and Rhode Island combined. Eureka is the only city in that five-county region with buildings over three stories, which is likely the reason that Eureka's Downtown has the highest "job density" in the region according to the US Census Bureau. Eureka is also home to the largest hospital in the region, the only commercial waterfront, the largest industrial waterfront, the largest concentration of lodging, and by far the largest continuous urban grid. In addition, while Eureka contains only 20 percent of Humboldt County's overall population, the City generates approximately 50 percent of the County's overall sales tax and is home to nearly half the jobs in the County. So, while Eureka is not a "big city," it plays the role of "the big city" in the north coast region.

The historic development pattern of Eureka is based on the early establishment of an uninterrupted urban grid with 300-foot blocks and alleys that pass through the center of nearly every block. From the 1860s through the 1950s, the commercial downtown was densely developed with three to five-story buildings, and the residential areas were

developed with a rich diversity of construction types, sizes, setbacks, and heights. The City was forward thinking in the establishment of wide sidewalks that accompany nearly every street in the grid, creating a city that is very walkable relative to many other similarly-size cities. While Caltrans's conversion of 4th and 5th Streets into Highway 101 severely diminished pedestrian connectivity between Downtown and the residential portion of the City, and while the industrial waterfront has experienced dramatic changes since its earliest days, the City's core grid and historic development patterns primarily remain intact.

In the 1960s the City adopted a strict proscriptive Euclidean zoning code, which became the most substantial obstacle to the construction of new high-quality development and for several decades was the primary source of deviations from the City's historic mixed-use development patterns. At the moment of its adoption, the 1960s code was out of alignment with the development in Eureka that already existed at the time and led to new development that was detrimentally-inconsistent with the City's previously-existing development pattern. It appears that the zoning code adopted in the 1960s was based on standards that were intended for suburban subdivisions, while Eureka was largely built-out at the time and needed a custom code specific to the unique conditions of Eureka. For instance, over 65 percent of Eureka's housing units were constructed prior to 1959 and the vast majority of the City's street network had been constructed by that time, which means that Eureka needed a zoning code that emphasized infill and development of vacant/underutilized properties.

Like most communities in California, Eureka is experiencing a shortage of housing at all income levels. Eureka is especially hard hit by this trend since the City is almost completely built-out and has little to no room for expanding the City's residential zone districts. According to the City's 2014-2019 Housing Element and recent housing projections associated with the City's General Plan Update, the maximum potential growth of new single-family residential homes built in conventional subdivisions is not likely to exceed a couple hundred at most. The City has conducted extensive analysis of opportunities for annexation and no meaningful opportunities for territorial expansion are viable. The City is surrounded by fully built-out residential subdivisions and coastal wetlands, which means that there is nowhere for the City to expand in order to create new housing. Accordingly, the City's recent analysis of vacant and underutilized parcels within City limits shows that the City's greatest opportunity for residential growth is through the construction of multi-story buildings in the Downtown and Old Town areas. Such development is envisioned to consist of multi-story buildings with retail on the ground floor and residential units on the upper floors.

In early 2019, the Eureka City Council rescinded the entire 1960-era zoning code and adopted an entirely new zoning code. The new code eliminated many regulations that held back the creation of housing,

simplified many development procedures, and includes a substantial set of new development incentives. In particular, the recently adopted code substantially advances opportunities for mixed use residential development in commercial zones including multi-story buildings with upper floor residential units, especially near transit stops. Mixed use residential developments have multiple advantages and can satisfy many of the goals and policies of the Housing Element. Residential units in dense multi-story buildings are likely to be smaller than other types of residential units, typically making them more affordable. Such development may also include a range of unit sizes, providing for a diverse mix of income levels in the same building. It is also possible for some or all of the units to be subdivided into condominium units, providing for opportunities for owner-occupied housing and, in some cases, affordable owner-occupied housing. Mixed use residential developments are also typically closer to amenities, such as transit stops, entertainment opportunities, grocery stores, and other basic needs. Such proximity can reduce or eliminate the need for vehicle ownership, thereby enhancing overall affordability. According to staff analysis, such developments are likely to constitute a substantial portion of the overall housing units developed in Eureka in the coming 20 years.

This strategy is not limited to mixed use development. Dense residential complexes that contain no commercial uses are allowed (and will be promoted) in the City's multi-family residential zones as well as in commercial zones.

Strategy 2: Accessory Dwelling Units

This strategy seeks to take advantage of the fact that over half of the City's residential units are currently single-family homes on individual lots, the vast majority of which could contain a second (accessory) unit. The City of Eureka contains approximately 10,000 total residential units and approximately 6,000 single-family residential parcels, which means that a majority of the residential units in the City are in the single-family residential zone district. According to estimates based on utility data, only 5 percent of these single-family parcels already contain an ADU (also known as a mother-in-law unit, granny flat, etc.). Given these numbers, the creation of ADUs constitutes a substantial opportunity for the creation of housing in Eureka. If just 10 percent of these parcels created an ADU, 600 new housing units would be created and the City would see a six percent increase in total housing units, which is more than has been generated in Eureka in the past several decades. For context, the average number of new housing units created City-wide in Eureka over the past 10 years was approximately 12 units per year. If just one percent of single-family parcels developed a new ADU each year, then the City would have 60 new housing units per year which is five times more than what has been developed each year in Eureka for the past 10 years. Clearly, ADUs present one of the best opportunities for Eureka to create new housing units.

The State of California recently required all jurisdictions to allow ADUs in Residential zones. The City of Eureka has gone beyond State requirements and provides enhanced allowances for ADUs. The City is also engaged in an on-going effort to promote and encourage the development of ADUs through publicity campaigns and outreach.

Strategy 3: Internal Conversions

This strategy focuses on providing the regulatory flexibility to modify the interiors of existing structures in order to create new residential units. Eureka is rich in historic structures. Many of these structures contained residential units on upper floors that were converted to office uses. With the recent demand for new housing units, there is a constant interest from owners of such buildings to convert upper floor offices spaces back to residential units. Some of the historic structures in the City consist of large homes that have sufficient internal space to be converted into multiple residential units without any modifications to building exteriors. In other cases, some property owners seek to convert unused garages into residential units.

Such “internal conversions” and adaptive reuse of existing underutilized structures is among the least expensive and most commonly pursued paths to create housing in Eureka. Compared to new construction, development costs may be reduced because internal conversions can often take advantage of existing foundations, walls, and roofs. This type of develop has the additional benefit of reducing neighborhood impacts because new buildings are not being constructed; in many instances, adjacent property owners are not aware that a conversion has occurred or that a new housing unit has been created.

Strategy 4: Small-Lot Subdivisions and Conservation Subdivisions

Similar to Strategy 1, this strategy focuses on embracing historic development patterns in Eureka that have been disallowed for the past several decades. Approximately 45 percent of all parcels in the City’s multi-family residential zone districts are less than 6,000 square feet. Yet, since the 1960s, the City has strictly enforced a minimum lot size of 6,000 square feet. Such a restriction has prevented what was formerly a common means of creating small lots and small residential structures. Known as “small lot subdivisions,” this strategy provides opportunities to create smaller-than-average developable lots (down to 2,000 square feet per lot) containing smaller-than-average single-family homes. Typically, this happens on lots that already contain residential structures. A typical example would be an existing small home (e.g. 1,200 square feet) on a standard City lot (e.g. 6,000 square feet). A portion of the lot (e.g. 3,000 square feet of the backyard) would be subdivided to provide a new buildable lot, which could then host a smaller (and therefore more affordable) 800-square-foot unit. Small Lot Subdivisions have a number

of advantages and can satisfy many of the goals and policies of the Housing Element. This regulatory option can generate housing units in places where property owners formerly never saw such an opportunity (such as a large and unused back yard). As a consequence, the number of residences (i.e. the actual residential density) can gently increase in a neighborhood without a substantial alternation of the neighborhood fabric or demolition of existing structures. While ADUs are on the same lot as their respective primary units and therefore cannot be sold, Small Lot Subdivisions create legally separate lots, which means that they can be individually sold. Small lots are inherently more affordable than larger lots and host smaller housing units, which are also inherently more affordable. Accordingly, Small Lot Subdivisions are among the best means of creating owner-occupied affordable housing.

A similar tool that has not formerly been allowed in Eureka is "conservation subdivisions." This option is valuable for parcels that have physical characteristics such as steep slopes and/or gulches that prevent or hinder traditional development. This regulatory option allows the owner of the property to preserve the unbuildable portions of the lot for conservation while shifting the development rights of the unbuildable portion to the buildable portion of the lot. The overall gross density of the parcel remains the same, but the net density of the buildable portion of the lot may be substantially higher than otherwise would be allowed.

Strategy 5: Geographically-Dispersed Affordable Housing through Affordable-by-Design Incentives and Local Density Bonuses

This strategy is complementary to the four strategies above and will be incorporated into each of them. The strategy is based on a commitment to promote and incentivize the creation of affordable housing in all future multi-unit residential developments in Eureka, regardless of location or zone district. The objective is for affordable housing to be geographically dispersed throughout the City. One way to do this is to incentivize the creation of affordable-by-design housing units and/or deed restricted housing units in all future residential projects. For example, when a developer approaches the City with the interest of developing a 15-unit apartment complex, the City will encourage the developer to build 16 units, with two of the total units being small "affordable-by-design" housing units.

In Eureka, "Affordable-by-Design" housing consists of housing units that are less than 500 square feet and are not required to provide dedicated off-street parking spaces. These units are naturally affordable due to their small size, as opposed to being made affordable by the legal mechanism of a deed-restriction. This is because, based on standard rental rates in Eureka, units that are less than 500 square feet are typically affordable to low and moderately low-income households in Eureka (i.e. the rent for such units is often less than 30 percent of the income of low-income

households). For instance, the annual household income for a 2-person very low income household (31 to 50 percent MFI) in Humboldt County is $24,000 per year, which means that rent at or below $600 per month is affordable. The affordable monthly rent for a 1-person low income household (51 to 80 percent MFI) is $839. With an average rental rate of $1 per square foot per month, a 500-square-foot unit is likely to be affordable to both a 2-person very low income household and a 1-person low income household. Therefore, in Eureka, a small housing unit does not need to be deed restricted in order to be affordable.

Small units are typically most appropriate for one and two-person households, which is a growing demographic sector in Eureka. Affordable-by-Design developments can consist of rental or owner-occupied housing units and may be either attached (e.g. apartment building/condominiums) or detached (e.g. bungalow courts). Another advantage of small units is that they can lead to considerably more density. For example, an Affordable-by-Design development on a 6,000-square-foot lot may have twelve 500-square-foot units instead of six 1,000-square-foot units.

Affordable-by-design units can take the form of ADUs, owner-occupied condominium units, upper-floor apartments in a mixed-use development, multi-family rental apartments, townhomes, live/work units, tiny houses, efficiency dwelling units, micro-units, shared housing, and even single-family homes. In each of these cases, the City will provide incentives to developers for a portion of their units to be “affordable-by-design” (i.e. 500 square feet or less). Because affordable-by-design housing can be incorporated into such a diverse range of housing types, the probability of geographic distribution throughout the City is much higher than more traditional forms of affordable housing, which typically consist of single large projects that are complexes of entirely affordable housing.

Finally, the City also has local affordable housing density bonus options that go beyond the density bonuses afforded by State law. The City’s local affordable housing density bonuses allow flexibility in development regulations and residential density for affordable housing built within a certain proximity of transit, schools, parks, and other similar amenities.

Guide to Goals, Policies, and Programs

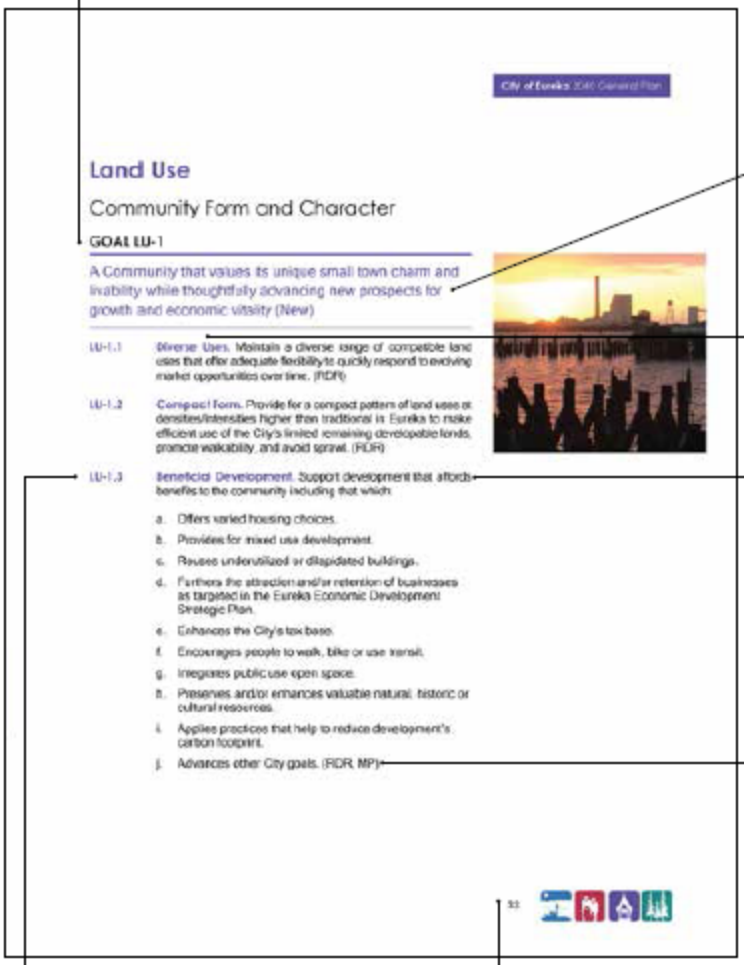
Like other Elements of the General Plan, the Housing Element contains a series of goals, policies, and implementation programs that articulate a direction for Eureka’s future. Goals express a desired end state reflective of the community’s vision. Policies guide City decision-making and actions to support the stated goals. Implementation Programs identify specific activities or actions intended to carry out various policies.

The following pages contain the City’s seven housing goals (desired end states). Each goal is followed by related policies (decision-making

guidance) that will direct the City toward the realization of the goals. While many of the policies will be enacted through a number of routine actions and operations, each policy is followed by a parenthetical reference to specific Implementation Programs that will also enact the policies. The specific Implementation Programs are focused actions to implement individual policies or a series of related policies. Each specific Implementation Program includes identification of City departments responsible for implementation as well as an implementation timeline. While a date range is provided for each implementation program, the actual timing of each implementation program will be determined by the City based upon the availability of funding and prioritization of resources. The Housing Element is intended to be pragmatic, while at the same time inspiring the community to reach above and beyond. It is recognized that goals, policies, and implementation programs will be carried out to the extent that resources are present to do so.

The following graphic provides a visual guide to the meaning and relationship of the Goals, Policies, and Programs.

Goal Numbering.
Each goal number starts with the element acronym and is followed by the number of the goal (e.g. LU-1 means Land Use Element, first goal)



City of Eureka 2040 General Plan

Land Use

Community Form and Character

GOAL LU-1

A Community that values its unique small town charm and livability while thoughtfully advancing new prospects for growth and economic vitality (New)

LU-1.1 **Diverse Uses.** Maintain a diverse range of compatible land uses that offer adequate flexibility to quickly respond to evolving market opportunities over time. (RDR)

LU-1.2 **Compact Form.** Provide for a compact pattern of land uses or densities/intensities higher than traditional in Eureka to make efficient use of the City's limited remaining developable lands, promote walkability, and avoid sprawl. (RDR)

LU-1.3 **Beneficial Development.** Support development that affords benefits to the community including that which:

a. Offers varied housing choices.
b. Provides for mixed use development.
c. Reuses underutilized or dilapidated buildings.
d. Furthers the attraction and/or retention of businesses as targeted in the Eureka Economic Development Strategic Plan.
e. Enhances the City's tax base.
f. Encourages people to walk, bike or use transit.
g. Integrates public use open space.
h. Preserves and/or enhances valuable natural, historic or cultural resources.
i. Applies practices that help to reduce development's carbon footprint.
j. Advances other City goals. (RDR, MP)

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Goal.
A goal expresses a desired end state reflective of the community's vision. Each goal has one or more policies associated with the goal.

Policy Title.
Each policy contains a leading title in bold for quick reference to the policy.

Policy.
A policy guides City decision-making and actions to support the stated goals to be carried out by implementation measures. Each policy is associated with a specific goal.

Implementation.
References a standard implementation tool or a specific program that implements the policy. Implementation tools and specific implementation programs are discussed at the end of the element or in the Implementation Chapter of this General Plan.

Page Number.

Policy Number.
Continuing from the goal numbering, the policy number is shown as the last number, supporting the goal that it follows (e.g., Policy LU-1.3 means Land Use Element, first goal, third policy)

Create Affordable and Market Rate Housing

GOAL H-1

Eureka's development regulations, permit processing procedures, and customer service standards are development-friendly and conducive to the production of housing.

H-1.1 **Flexible and Accommodating Regulations.** Regularly evaluate and modify City development-related regulations, standards, and residential density maximums to allow for a diverse range of housing options. Actively strive to eliminate unnecessary and burdensome government regulations that restrain or impede the development of housing. (RDR) (Implemented by: Imp H-1; Imp H-2; Imp H-3; Imp H-5) (See also: LU-1.6, LU-1.8 and LU-6.3)

H-1.2 **Customer Service Standards.** Regularly assess and update the City's development review processes, permitting procedures, and customer service standards in pursuit of maximum efficiency, effectiveness, and timeliness. Actively strive to eliminate unnecessary and burdensome government procedures and processes that restrain or impede the development of housing. (RDR) (Implemented by: Imp H-5)

H-1.3 **Public Improvement Requirements.** Regularly evaluate and modify the City's "Public Improvement Requirements" (PIRs) to optimize the balance between funding public facilities and stimulating the creation of housing units. Ensure that PIR triggers reflect current and realistic construction cost considerations. Adopt modern best practices employed by other communities. (RDR, OFB) (Implemented by: Imp H-6)

H-1.4 **Permitting Fees.** Periodically review City permitting, impact, and utility connection fees to ensure that they do not unduly constrain housing development while balancing the need to use fees in order to finance staffing and necessary public improvements. (RDR, OFB) (Implemented by: Imp H-4)

H-1.5 **Reduced Fees for Affordable Housing.** Consider permit fee and utility connection fee reductions for developments

that meet the affordable and special housing needs of the community. (RDR, OFB) (Implemented by: Imp H-4; Imp H-16; Imp H-18)

H-1.6 **Pre-permitting Options.** Explore pre-permitting options that would provide accelerated and/or alternative means of acquiring necessary permits for the creation of new housing units. (RDR) (Implemented by: Imp H-9; Imp H-12) (See also: LU-6.3)

H-1.7 **Parking Standards and Parking Management.** In Mixed Use and Multi-Family Residential zones, continue to provide regulatory options in which the number of required parking spaces for housing development can be reduced or eliminated to incentivize the creation of denser-than-average housing development. Regularly review and modify development standards related to the required amount of parking for the development of new housing, as well as the management of on-street parking. Seek to optimize the balance between parking supply, parking management, and the creation of new housing units. Default on the side of prioritizing the creation of new housing units over the creation of parking spaces. (RDR) (Implemented by: Imp H-3; Imp H-7; H-10) (See also: LU-1-10)

H-1.8 **Transit Passes.** In Mixed Use and multi-family residential zones, continue to provide regulatory options in which required parking spaces for residential units can be waived for developments that provide perpetual transit passes for tenants. Encourage developers to provide transit passes to reduce the cost of housing development as well as generate denser-than-average housing development, thereby leading to more housing. (RDR, PI) (Implemented by: Imp H-2; Imp H-7)

H-1.9 **Bike Parking.** Continue to provide regulatory options In Mixed Use and Multi-Family Residential zones that waive required parking spaces for residential units in exchange for on-site bicycle parking. Encourage developers to provide bike parking to reduce the cost of housing development as well as to generate denser-than-average housing development, thereby leading to more housing. (RDR) (Implemented by: Imp H-2; Imp H-3; Imp H-7; Imp H-10) (See also: M-3.8 and M-3.9)

H-1.10 **Building Heights and Floor Area Ratios.** Allow multi-story buildings in Mixed Use zones with building heights and floor area ratios in excess of existing buildings in order to promote dense upper-floor residential and mixed use developments.

(RDR) (Implemented by: Imp H-1; Imp H-2; Imp H-3; Imp H-5) (See also: LU-6.1)

H-1.11 **Development Standards.** In residential zones, continue to allow setbacks that are close-to-the-street, generous maximum site coverage allowances, and sufficient floor area ratios that incentivize the development of residential units while honoring the look and feel of Eureka's legacy residential neighborhoods. (RDR) (Implemented by: Imp H-1; Imp H-2; Imp H-3; Imp H-5) (See also: LU-1.11)

H-1.12 **Diverse Housing Development Options.** Continue to provide a diverse range of housing development options beyond typical single-family and multi-family developments, such as: small lot subdivisions, conservation subdivisions, internal conversions, adaptive reuse, mixed use development, tiny houses, efficiency dwelling units, micro-units, and shared housing. Explore adding additional alternative options. (RDR) (Implemented by: Imp H-1; Imp H-3; Imp H-7; Imp H-13; Imp H-14; Imp H-15) (See also: LU-1.1 and LU-5.1)

H-1.13 **Tiny Houses.** Continue to allow regulatory options for tiny houses to count as residential units, as long as the units comply with the California Building Code. (RDR) (Implemented by: Imp H-1; Imp H-13; Imp H-14)

H-1.14 **Tiny Houses on Wheels.** Explore the creation of regulatory options that would allow tiny houses on wheels (classified as recreational vehicles) to be considered residential units, as long as the vehicles comply with the California Vehicle Code. Require design standards for Tiny Houses on Wheels wherever they are allowed to serve as residential units. (RDR) (Implemented by: Imp H-1; Imp H-14)

H-1.15 **Deed-Restricted Affordable Housing Incentives.** Continue to provide local regulatory incentives (beyond those provided via State density bonus law) for deed-restricted affordable housing. Explore adding additional local regulatory incentives. (RDR) (Implemented by: Imp H-1; Imp H-3; Imp H-7; Imp H-16; Imp H-18)

H-1.16 **Affordable-by-Design Incentives.** Continue to provide local regulatory incentives for affordable-by-design housing, in which incentives are provided to build housing units that are smaller than 500 square feet per unit. Such units can be less expensive to develop and can generate denser-than-average housing developments, thereby leading to an overall increase in total housing units as well as more units that are

inherently affordable without being deed restricted. Explore adding additional local regulatory incentives. (RDR) (Implemented by: Imp H-1; Imp H-3, Imp H-7, Imp H-11, Imp H-12, Imp H-27)

H-1.17 **Development Agreements.** Encourage the provision of affordable housing through the use of development agreements that provide incentives to developers in exchange for the provision of affordable housing. (RDR) (Implemented by: Imp H-1; Imp H-2; Imp H-3; Imp H-7) (See also: E-8.8)

H-1.18 **Expedite Permit Reviews For Affordable Housing Projects.** Consider procedures that expedite permit reviews for affordable housing projects. Also, actively support non-profit and for-profit developers of affordable housing projects by offering: assistance in locating suitable sites, assistance with preliminary concept development, multi-department pre-application meetings, and grant-writing support. (RDR) (Implemented by: Imp H-1; Imp H-5; H-16; H-18)

H-1.19 **Upzoning.** Where feasible and consistent with the objectives of the General Plan, support feasible requests by property owners to "upzone" their property to land use classifications and zone classifications that allow for an increase in residential density, particularly where such properties are on or near the edges of zone districts with higher densities. (RDR) (Implemented by: Imp H-1; Imp H-2; Imp H-3)

H-1.20 **Local Coastal Plan.** Actively pursue Coastal Commission certification of a substantially reformed City of Eureka Local Coastal Program that allows the types of regulations and development options that support and promote the creation of housing, including those housing-friendly regulatory options already allowed by the City outside of the Coastal Zone. (RDR, IGC) (Implemented by: Imp H-1; Imp H-2; Imp H-3)

H-1.21 **Illegal Unit Amnesty.** Encourage property owners to declare illegal dwelling units and to bring such units into conformance with applicable building and housing codes. Explore the creation of an Unpermitted Unit Amnesty Program (RDR, PI) (Implemented by: Imp H-1; Imp H-2; Imp H-3; Imp H-5; Imp H-12; Imp H-20)

GOAL H-2

The City government actively facilitates the creation of a range of new affordable and market rate housing units to accommodate future growth and to address the needs of all socioeconomic segments of the community.

H-2.1 **Facilitate Diverse Options.** Facilitate the development of a diverse range of housing options including, but not limited to: single-family homes, Accessory Dwelling Units (ADUs), multi-family rental housing, condominiums, townhomes, live/work units, housing in mixed use developments, dense multi-story developments, tiny houses, efficiency dwelling units, micro-units, shared housing, owner-occupied affordable housing, and other housing types. (RDR) (Implemented by: Imp H-1; Imp H-2; Imp H-3; Imp H-4; Imp H-5; Imp H-6; Imp H-7; Imp H-8; Imp H-9) (See also: LU-1.3)

H-2.2 **Complementary Partnership with Nearby Jurisdictions.** Acknowledge, embrace, and promote Eureka's unique position in Humboldt County as being one of the few places in which multi-story mixed use development and dense infill is possible. Also acknowledge and accept that Eureka is unlikely to create a significant number of new single-family residential units due to the City's largely built-out condition and geographic constraints. With these facts acknowledged, work with neighboring jurisdictions to allow types of housing in Eureka that are unlikely to be produced in other communities. Allow Eureka's future housing developments to serve as a symbiotic complement to the mostly single-family developments that are likely to occur in the nearby incorporated communities and in the unincorporated areas around Eureka. (IGC) (Implemented by: Imp H-1; Imp H-2; Imp H-3; Imp H-7; Imp H-8; Imp H-9; Imp H-10; Imp H-11; Imp H-12; Imp H-13; Imp H-14; Imp H-15; Imp H-19; Imp H-27; Imp H-28) (See also: LU-6.7)

H-2.3 **Site Inventory.** Analyze all parcels in the City and then create/maintain an inventory of all parcels that contain the potential of hosting new housing units. (Implemented by: Imp H-7; Imp H-8; Imp H-11) (See also: E-3.2)

H-2.4 **Maximum Density Infill.** Promote and encourage the development of the last remaining vacant lots in the City with housing units at the highest density allowed in each respective zone district. (JP, IGC, PI) (Implemented by: Imp H-7; Imp H-8; Imp H-11) (See also: LU-6.2)

H-2.5 **Recruitment of High-priority Sites.** Identify high priority sites that have the best potential of hosting the types of housing most needed in the city and/or the sites that have the best potential of hosting the most number of units. For each high priority site, actively recruit the owners to build or sell. (JP, IGC, PI) (Implemented by: Imp H-7; Imp H-8; Imp H-11) (See also: E-3.2)

H-2.6 **Promotional Materials.** Develop educational and promotional materials for property owners and prospective non-profit and private developers. Design the materials to promote the various housing-friendly regulatory development standards and incentives available in Eureka. Share the materials with the objective of stimulating the creation of all ranges, types, and densities of housing. (PI) (Implemented by: Imp H-7)

H-2.7 **Land Suitable for Housing.** Provide as-needed assistance to non-profits, real estate professionals, design professionals, contractors, and other development specialists in identifying land suitable for and appropriately-zoned for any forms of housing development. (RDR, PI) (Implemented by: Imp H-7; Imp H-8; Imp H-9; Imp H-11) (See also: E-3.2)

H-2.8 **Mixed Use Residential.** Promote and encourage the development of new residential units in mixed use zones, with particular emphasis on multi-story buildings, upper floor residential units, and residential units near transit stops. (RDR, PI) (Implemented by: Imp H-1; Imp H-2; Imp H-3) (See also: LU-1.3, LU-2.1, and LU-3.4)

H-2.9 **Small Lot Subdivisions.** Promote and encourage small lot subdivisions as:

a) An opportunity to develop residential units on already-developed sites;

b) A way for property owners to subdivide a portion of a property while retaining and preserving existing structures;

c) A process with high probability of creating owner-occupied affordable-by-design housing units with lower-than-average purchase prices;

d) A means of increasing the actual (as opposed to the maximum allowed) housing density in Multi-Family Residential zone districts. (RDR, PI) (Implemented by: Imp H-1; Imp H-2; Imp H-3; Imp H-7; Imp H-9; Imp H-11)

H-2.10 **Accessory Dwelling Units.** Promote and encourage the creation of accessory Dwelling Units (ADUs) as:

a) An opportunity for property owners to create a source of rental revenue on their property;

b) A means to develop residential units on already-developed sites;

c) A way for a property owner to build a new residential unit while retaining and preserving existing structure(s);

d) A vehicle for creating smaller-than-average (and thereby "affordable-by-design") housing units; and

e) A means of increasing the actual (as opposed to the maximum allowed) housing density in Single-Family Residential zone districts. (RDR, PI) (Implemented by: Imp H-1; Imp H-2; Imp H-3; Imp H-6; Imp H-7; Imp H-9; Imp H-12) (See also: LU-5.5)

H-2.11 **Conservation Subdivisions.** Promote and encourage conservation subdivisions as an opportunity to develop difficult-to-develop sites where steep slopes and gulches prevent or limit development. Conservation subdivisions transfer the development rights of unbuildable areas to the limited buildable areas and then preserve the unbuildable areas for conservation. (RDR, JP, PI) (Implemented by: Imp H-1; Imp H-2; Imp H-3; Imp H-7; Imp H-9; Imp H-11)

H-2.12 **Internal Conversions and Adaptive Reuse.** Promote and encourage the conversion of unused or under-utilized non-residential spaces in existing building to residential uses. (RDR, JP, PI) (Implemented by: Imp H-1; Imp H-2; Imp H-3; Imp H-7; Imp H-11)

H-2.13 **Density Bonus Laws.** Promote and encourage the utilization of State and local density bonus laws, which provide development incentives (including increased residential density) in exchange for the creation of affordable housing. (RDR, PI) (Implemented by: Imp H-1; Imp H-2; Imp H-3; Imp H-7; Imp H-9; Imp H-16; Imp H-18)

H-2.14 **Motel Conversions to Affordable Housing.** Promote and encourage the conversion of under-utilized and/or under-performing motels into affordable housing. Encourage motels with chronic code enforcement violations to sell to affordable housing developers. (RDR, IGC, JP, PI) (Implemented by: Imp H-1; Imp H-15)

H-2.15 **Mixed-income Housing.** Encourage the development of mixed-income housing that includes various household

compositions to accommodate a range of ages and family types. (RDR) (Implemented by: Imp H-1; Imp H-2; Imp H-3)

H-2.16 **Support Non-profits.** Support the development of affordable housing by non-profit organizations through assistance with grants, consultation regarding concept development, and facilitation of multi-department pre-application meetings. (IGC, JP, PI) (Implemented by: Imp H-8; Imp H-16; Imp H-18; Imp H-27)

H-2.17 **Housing Units on Church Property.** Encourage churches to build residential units on unused or underutilized church property. Allow churches to sacrifice parking spaces to construct "tiny houses" (a housing unit compliant with the California Building Code could consume less than two parking spaces). (PI) (Implemented by: Imp H-1; Imp H-14 Imp H-27)

H-2.18 **Grants for Housing.** Actively monitor State and Federal grant/loan programs directed at the construction and/or rehabilitation of housing. Pursue grants that satisfy other goals/policies. (IGC, JP) (Implemented by: Imp H-16; Imp H-17; Imp H-18; Imp H-21; Imp H-25; Imp H-27; Imp H-29)

H-2.19 **Public Private Partnerships.** Explore public private partnerships where such arrangements are favorable to the creation of housing and that satisfy other goals/policies. (JP, PI) (Implemented by: Imp H-16; Imp H-17; Imp H-18; Imp H-21; Imp H-25; Imp H-27; Imp H-29)

H-2.20 **Transit Services.** Support the enhancement and expansion of intra-city and regional transit services that complement the development of mixed-use housing and affordable housing. (IGC, JP) (Implemented by: Imp H-1; Imp H-10) (See also: M-4.1)

H-2.21 **Day Care.** Support the development of day care facilities, which complement the development of housing. (JP, PI) (Implemented by: Imp H-1; Imp H-2; Imp H-3)

H-2.22 **Shared Housing.** Continue to support and actively market shared housing as an affordable housing option, especially for seniors and people with special needs. (IGC, JP, PI) (Implemented by: Imp H-1; Imp H-2; Imp H-3; Imp H-18; Imp H-27)

GOAL H-3

Owner-occupied affordable housing is among the mix of housing types created in Eureka.

H-3.1 **Affordable by Design.** Promote and encourage a range of affordable-by-design residential units across all zone districts where residential development is allowed. Affordable-by-design developments typically consist of small units (less than 500 square feet per unit), and are naturally affordable because of the small unit size and because units are typically not required to provide dedicated off-street parking spaces (which can raise costs). Promote the fact that affordable-by-design developments can be either rental units or owner-occupied units in both attached (e.g. apartment building/ condominiums) or detached configurations (e.g. bungalow courts). (RDR, PI) (Implemented by: Imp H-1; Imp H-3, Imp H-7, Imp H-11, Imp H-12, Imp H-27)

H-3.2 **Condominium Options.** In multi-family and mixed-use zones, allow regulatory options for the subdivision of individual units that can be individually sold, especially small-than-average units. (RDR) (Implemented by: Imp H-1; Imp H-2; Imp H-7)

H-3.3 **Small Lot Subdivisions.** Promote and encourage small lot subdivisions as a vehicle for creating smaller-than-average lots and smaller-than-average housing units. Encourage owners of such lots to sell instead of leasing. (RDR, PI) (Implemented by: Imp H-1; Imp H-2; Imp H-3; Imp H-7; Imp H-9; Imp H-11; Imp H-27)

H-3.4 **Homeownership and Rehab Assistance Programs.** Monitor State and Federal grant/loan programs associated with homebuyer and owner-occupied rehabilitation assistance. Seek to acquire grants/loans when the terms of such programs are viable in Eureka. (IGC, JP, PI) (Implemented by: Imp H1; Imp H-7; Imp H-17; Imp H-18; Imp H-25)

H-3.5 **Homeownership Education and Outreach.** Increase homeownership in the City through education, outreach, and partnerships with non-profit organizations. (JP, PI) (Implemented by: Imp H1; Imp H-7; Imp H-17; Imp H-18; Imp H-25; Imp H-30)

Preserve and Improve Affordable and Market Rate Housing

GOAL H-4

All neighborhoods are clean and safe, while all levels and types of housing units throughout Eureka are consistently maintained at a high level of quality and integrity.

H-4.1 **Energy Efficiency.** Encourage cost effective energy efficient upgrades to housing, including the use of passive systems, to decrease energy use. (PI) (Implemented by: Imp H-1; Imp H-23) (See also: U-5.1 through U-5.5)

H-4.2 **Enhance Existing Neighborhoods.** Ensure that new developments enhance existing neighborhoods by:

a) Encouraging developers to provide street planting, landscaping, lighting, underground utilities, and other privately-funded community amenities as part of any subdivision or development project;

b) Continuing to require aesthetic design standards for fences, landscaping, and parking lots for all residential development; and

c) Continuing to implement design review criteria that encourage high quality standards of design and materials in all multi-family residential developments. (RDR, JP, PI) (Implemented by: Imp H-1; Imp H-2; Imp H-3; Imp H-7) (See also: LU-1.3, IU-1.12 through LU-1.21, LU-5.5, LU-5.7 and LU-5.8)

H-4.3 **Condition of Housing.** Support all organizations, activities, and community-driven programs focused on improving the condition of housing. Encourage citizen involvement in property maintenance and efforts to improve the housing stock and overall neighborhood quality. (IGC, JP, PI) (Implemented by: Imp H-1; Imp H-20; Imp H-21) (See also: CS-2.6)

H-4.4 **Awareness of Importance of Maintenance.** Promote increased awareness among property owners and residents of the importance of property maintenance to long-term housing quality. (JP, PI) (Implemented by: Imp H-20; Imp H-21; Imp H-25)

H-4.5 **Maintenance Assistance Programs.** Pursue State/Federal funds to assist low-income owners of housing units with rehabilitation and reduction of operational costs. Support non-profit organizations that provide related assistance. Where feasible, assist landlords and other property owners in maintaining and improving their properties through State-funded residential rehabilitation assistance programs, the Mills Act, and other innovative mechanisms that do not rely on City-funded subsidies. Prioritize dwelling units owned or occupied by seniors, low-income individuals/households, and special needs individuals. (IGC, JP, PI) (Implemented by: Imp H-25)

H-4.6 **On-Site Management.** Promote strong, on-site management of apartment complexes to ensure the maintenance of housing and neighborhood quality. (JP, PI) (Implemented by: Imp H-18; Imp H-30)

H-4.7 **Code Enforcement.** Continue to utilize the City's code enforcement program to bring substandard units into compliance with City codes and to improve overall housing conditions. Where appropriate, pursue nuisance abatement and the elimination of overcrowded, unsafe, unsanitary conditions within residential neighborhoods. (RDR, OFB) (Implemented by: Imp H-20) (See also: CS-2.6)

H-4.8 **Public Health and Safety.** Continue to support healthy neighborhoods by addressing public health and safety issues through cooperative partnerships between neighborhood associations, non-profits, Code Enforcement, the Eureka Police Department, Humboldt Bay Fire, Humboldt County Health and Human Services, Humboldt County Health Department, and other public agencies. (RDR, IGC, JP, PI) (Implemented by: Imp H-20; Imp H-21) (See also: HS-5.1 through HS-5.5)

H-4.9 **Property Inspections.** Continue to work with Humboldt Bay Fire to perform ongoing property inspections of R-1 and R-2 occupancy residential units. (JP) (Implemented by: Imp H-20; Imp H-21) (See also: CS-2.6)

GOAL H-5

Existing affordable housing units are retained and preserved, while displacement from housing is minimized.

H-5.1 **Vacation Rentals.** Establish and maintain a cap on the number of full unit vacation rentals in residential zone districts. (RDR) (Implemented by: Imp H-22)

H-5.2 **Accessible Units.** Encourage the development of residential units that are accessible to handicapped persons or are adaptable for conversion to housing for handicapped persons. (RDR, JP, PI) (Implemented by: Imp H-16; Imp H-18)

H-5.3 **Retention of Affordable Rental Housing.** Support the retention of existing affordable rental housing where feasible and encourage the enhanced replacement of lost units. (IGC, JP, PI) (Implemented by: Imp H-16; Imp H-18; Imp H-25; Imp H-26)

H-5.4 **Long-Term Vacancies.** Avoid resident displacement and reductions in housing stock from long-term vacancies. (Implemented by: Imp H-26)

H-5.5 **Loss by Neglect.** Support proactive measures to prevent the loss of low-income housing by neglect. (PI) (Implemented by: Imp H-20; Imp H-21; Imp H-26)

H-5.6 **Displacement of Existing Residents.** Work to prevent or minimize displacement of existing residents. (Implemented by: Imp H-20; Imp H-21; Imp H-23; Imp H-25)

H-5.7 **Replacement of Multi-Family Housing.** Encourage the replacement of multi-family housing that is demolished with housing that is affordable to a wide spectrum of households. (JP, PI) (Implemented by: Imp H-16; Imp H-18; Imp H-29; Imp H-32)

H-5.8 **At-risk Affordable Housing Units.** Preserve "at-risk" affordable units through monitoring, working with potential nonprofit purchasers/managers, and exploring funding sources available to preserve at-risk units. (IGC, JP, PI) (Implemented by: Imp H-20; Imp H-21; Imp H-23; Imp H-25)

Promote Equal Access to Housing for All

GOAL H-6

All residents of Eureka have equal access to housing options.

H-6.1 **Safe and Stable Housing.** Work towards safe and stable housing for all members of the community. (RDR, IGC, JP, PI) (Implemented by: Imp H-15; Imp H-16; Imp H-17; Imp H-18; Imp H-20; Imp H-21; Imp H-23; Imp H-28; Imp H-29; Imp H-30; Imp H-31; Imp H-32) (See also: HS-5.5 and HS-5.6)

H-6.2 **Prohibit Discrimination.** Continue to prohibit discrimination in the sale or rental of housing with regard to race, color, religion, age, sex, familial status, marital status, disability/medical conditions, national origin, citizenship, status as a student, source of income, political affiliation, gender identity, or sexual orientation. (PI) (Implemented by: Imp H-15; Imp H-16; Imp H-17; Imp H-18; Imp H-20; Imp H-28; Imp H-29; Imp H-30; Imp H-31; Imp H-32)

H-6.3 **Non-Profit Service Providers.** Support non-profit service providers that help meet the diverse housing and supportive service needs of the community. (IGC, JP, PI) (Implemented by: Imp H-15; Imp H-16; Imp H-17; Imp H-18; Imp H-20; Imp H-21; Imp H-23; Imp H-28; Imp H-29; Imp H-30; Imp H-31; Imp H-32)

H-6.4 **Fair Housing Choices.** Continue to further fair housing choices through actively expanding housing opportunities and removing impediments to fair housing. (RDR, PI) (Implemented by: Imp H-15 through H-18, Imp H-20 and Imp H-21; Imp H-23; Imp H-28 through Imp H-32) (See also: LU-1.3 and LU-5.1 through LU-5.8)

H-6.5 **Pedestrian and Bicycle Connectivity.** Ensure that projects integrate safe pedestrian and/or bike connectivity to existing or proposed destinations such as employment, shopping, business, and other residential developments to reduce vehicle miles traveled, promote alternative modes of transportation, and ensure pedestrian and bicycle safety. (RDR, IGC, JP, PI) (See also: M-3.7 through M-3.12)

H-6.6 **Transit Services.** Support regional efforts to enhance and expand transit services. (IGC, JP, PI) (See also: M-4.1)

H-6.7 **Rental Subsidies and Assistance.** Support County, State, and Federal rental subsidy and rental assistance programs, such as Housing Choice Vouchers. (IGC, JP, PI) (Implemented by: H-25)

GOAL H-7

The rate of homeless in Eureka is substantially lower than it has been in the past.

H-7.1 **Homelessness Strategy.** Develop a new Eureka Homelessness Strategic Plan. (MP, IGC, JP, PI) (Implemented by: H-27)

H-7.2 **End Homelessness.** Seek to end homelessness in Eureka through support for and participation in multiple strategies, including housing-first principles, Substance Use Disorder programs, counseling and support services, income assistance programs, job training/counseling services, and other proven methods of reducing the incidence and effects of homelessness. Support non-profit organizations and public agencies with a proven track record of accomplishing these sorts of strategies, principals, programs, and services. (IGC, JP, PI) (Implemented by: H-27) (See also HS-5.4 through HS-5.6)

H-7.3 **Balanced Distribution of Resources County-wide.** Work with the various branches of the Humboldt County government, as well as the six other incorporated cities in the County, to advocate for a balanced distribution of low income and homelessness resources and projects throughout the County and discourage resources, projects, and solutions to be over concentrated in Eureka. (IGC, MP, JP) (Implemented by: Imp H-28) (See also: LU-2.8 and HS-5.7)

H-7.4 **Landlord Recruitment.** Recruit property owners, property managers, and landlords to offer housing to homeless individuals and families at standard or reduced rates. Work with Non-profit organizations and Humboldt County Department of Health and Human Services to provide rental subsidies, rental assistance, and guarantees. (IGC, JP, PI)

H-7.5 **Referrals through Mobile Outreach.** Maintain partnerships between City of Eureka Community Services programs, Eureka Police Department, and Humboldt County Department of Health and Human Services to engage in mobile outreach to homeless individuals. When appropriate and feasible, make housing referrals and service referrals during mobile engagements. (IGC, JP, PI) (Imp H-27 and H-28) (See also: HS-5.5 through HS-5.7)

Summary of Quantified Objectives (Regional Housing Needs Allocation)

The following table summarizes the City's quantified objectives for the period of 2019-2027. All objectives to be realized via the actions contained in the Implementation Programs:

Income	New Construction	Rehabilitation	Conservation/ Preservation
Extremely Low	116	67	90
Very Low	115	38	90
Low	147	50	
Moderate	172	95	
Above Moderate	402		
Total	952	250	180

Implementation

IMP H-1: Annual Evaluation of Implementation Programs and Annual Housing Production Report

The City of Eureka Housing Element is effectively a strategic plan to generate the types and quantities of housing needed to accommodate future growth and to address the needs of all socioeconomic segments of the community. The Implementation Programs herein represent the City's intended efforts to stimulate such housing development. Regular evaluation of these Programs and the City's efforts to stimulate the creation of housing is necessary in order to ensure that the City is engaged in the most efficient and effective activities to accomplish the goals of this plan. Accordingly, the City will engage in an annual review of this Housing Element and the Implementation Programs to evaluate their effectiveness and to adjust as needed. A part of this evaluation will be an on-going 10-year rolling trend analysis of housing units created in Eureka by type. This program consists of three on-going actions:

- Action One: Each year, produce a series of graphs/tables outlining the total number of housing units created in the City, classified by category (such as single-family, multi-family, etc.) and, where feasible, affordability level. The graphs/tables will also include an on-going 10-year trend analysis of housing units created to evaluate the current year relative to past trends.
- Action Two: Based on the above graphs/tables, evaluate the City's efforts over the past year to enact the implementation measures of

the Housing Element and determine which efforts were most effective and which efforts/programs need to be improved. The graphs, tables, and evaluation of City efforts will then be incorporated into a summary report.

- Action Three: Provide the annual report to the City's Housing Advisory Board, Planning Commission, and City Council. The report will be available to the general public.

Implements Policies: H-1.1, H-1.10, H-1.11, H-1.12, H-1.13, H-1.14, H-1.15, H-1.16, H-1.17, H-1.18, H-1.19, H-1.20, H-1.21, H-2.1, H-2.2, H-2.8, H-2.9, H-2.10, H-2.11, H-2.12, H-2.13, H-2.14, H-2.15, H-2.17, H-2.20, H-2.21, H-2.22, H-3.1, H-3.2, H-3.3, H-3.4, H-3.5, H-4.1, H-4.2, H-4.3

Timeframe: Annually 2019-2027

Responsible Parties: Development Services

Funding: Departmental budget (no funding required; task consists only of staff time)

IMP H-2: Ongoing Evaluation and Refinement of Development Regulations

Locally-adopted development regulations, such as the Zoning Code, are the chief means of implementing the General Plan (including the Housing Element). It is important that the regulations are effective and meet the changing needs of the community. This program requires that Development Services and other departments continually review and revise local development regulations to ensure that they are appropriate, effective, consistent with state and federal law, and do not unduly burden the creation of housing. This program consists of two on-going actions:

- Action One: At the end of each calendar year, evaluate the City's development regulations based on staff experience and community feedback to determine if any City development regulations have proven to be unnecessarily burdensome or detrimental to the production of housing over the course of the year. Hold one annual community workshop for members of the public to present their own ideas for zoning code modifications.
- Action Two: Provide these findings to the Planning Commission and City Council. City Council may direct staff to add, modify, or eliminate City development regulations that restrain or impede the production of housing.

Implements Policies: H-1.1, H-1.8, H-1.9, H-1.10, H-1.11, H-1.17, H-1.19, H-1.20, H-1.21, H-2.1, H-2.2, H-2.8, H-2.9, H-2.10, H-2.11, H-2.12, H-2.13, H-2.15, H-2.21, H-2.22, H-3.2, H-3.3, H-4.2

Timeframe: Annually 2019-2027. All revisions to be complete within one year of being identified.

Responsible Parties: Development Services and Public Works
Funding: Departmental budget (no funding required; task consists only of staff time)

IMP H-3: Revision of Specific Development Regulations

In early 2019, the Eureka City Council rescinded the entire Eureka zoning code and adopted an entirely new zoning code. The new code eliminated many regulations that held back the creation of housing, simplified many development procedures, and includes a substantial set of new development incentives. However, additional reform to Eureka's development regulations are necessary to further ease and promote the development of housing. Specifically, in pursuit of easing the development processes associated with the production of housing, the City's Coastal Zone regulations need to be updated and modernized, as do the City's subdivision and historic preservation regulations. This program consists of three one-time actions:

- Action One: Actively pursue Coastal Commission Certification of a substantially reformed City of Eureka Local Coastal Program that allows the following types of regulations and development options that support and promote the creation of housing: increased residential density, increased floor area ratios, increased building height limits, reduced parking standards, condominiums, townhomes, small lot subdivisions, conservation subdivisions, internal conversions, Accessory Dwelling Units (ADUs), live/work units, mixed use developments, dense multi-story developments with upper floor residential, tiny houses, efficiency dwelling units, micro-units, shared housing, owner-occupied affordable housing, local affordable housing density bonuses, affordable-by-design incentives, parking reduction incentives, and other housing-friendly regulatory options already allowed by the City outside of the Coastal Zone.
- Action Two: Comprehensively update the City's subdivision regulations to improve readability both for staff and the public, ensure consistency with the Subdivision Map Act and other laws, and to provide clear regulatory paths forward for a diverse range of housing types such as small lot subdivisions and condominiums.
- Action Three: Comprehensively update the City's historic preservation regulations to ensure that they contain modern best-practices for preserving historic structures without unduly constraining the creation of housing.

Implements Policies: H-1.1, H-1.7, H-1.9, H-1.10, H-1.11, H-1.12, H-1.15, H-1.16, H-1.17, H-1.19, H-1.20, H-1.21, H-2.1, H-2.2, H-2.8, H-2.9, H-2.10, H-2.11, H-2.12, H-2.13, H-2.15, H-2.21, H-2.22, H-3.1, H-3.3, H-4.2

Timeframe: 2021 (Action 1), 2020 (Action 2), 2024 (Action 3)

Responsible Parties: Development Services

Funding: Departmental budget (no funding required; task consists only of staff time)

Imp H-4: Ongoing Evaluation and Refinement of Permit Fees and Utility Connection Fees

Along with development regulations, permit fees and utility connection fees are an important consideration in the establishment of an environment that is conducive to the production of housing. Including Eureka, there are seven incorporated cities in Humboldt County and several others in the general region. Eureka's permit fees and utility connection fees should be equivalent to and/or competitive with the fees of other nearby jurisdictions. This program requires that City staff continually review, evaluate, and refine City permit fees and utility connection fees to ensure that they do not unduly burden the creation of housing. Additional analysis will be conducted periodically (not necessarily annually) to determine the feasibility and legality of fee reductions for developments that meet the affordable and special housing needs of the community. This program consists of three on-going actions:

- Action One: Each year, evaluate the City's development related permit fees to ensure that the City's fees are competitive with fees established by other jurisdictions in the region and to ensure that none of the City's fees substantially impede the production of housing.
- Action Two: Each year, evaluate the City's development related permit fees to determine if it is feasible to establish reduced fees for housing developments that affordable and special housing needs of the community.
- Action Three: Through the annual fee schedule adoption process by City Council, make a recommendation.
- Action Four: Evaluate the potential to reduce or eliminate building permit fees and/or impact fees for ADUs and/or affordable housing units

Implements Policies: H-1.4, H-1.5, H-2.1

Timeframe: 2019-2027

Responsible Parties: Development Services and Public Works

Funding: Departmental budget (no funding required; task consists only of staff time)

IMP H-5: Process Improvement Action Plan

Efficient and effective development review processes, permitting procedures, and customer service standards are critical to facilitate the creation of housing. When a person applies for any development-related permit, the proposed development undergoes review by a number of City departments. Typically, development-related applications are distributed for review to at least three City departments. The Development Services Department confirms that the application meets zoning requirements (uses, setbacks, building heights). The Engineering Division of the Public Works Department evaluates access and infrastructure needs (driveway access, utility connections, PIRs, etc.), and the Building Division of the Public Works Department reviews the construction drawings to ensure that the project complies with State and City the building codes. For some projects, Humboldt Bay Fire, the Eureka Police Department, PG&E, Caltrans, and other entities also participate in plan reviews. To achieve timely, efficient, accurate, and consistent development review, the various reviewing departments needs to work in harmony. This program calls for a review of existing procedures, exploration of best practices, and consideration of potential workflow process improvements. This program consists of three on-going actions:

- Action One: At least once every other year, conduct a multi-department customer service survey aimed at property owners, business owners, and development professionals that have engaged in development processes in Eureka within the past two years of when the survey is issued. The purpose of the survey is to determine which City development review processes, permitting procedures, and customer service standards are the greatest obstacle to development from the perspective of those individuals seeking to engage in development.
- Action Two: Following each survey, create a taskforce of City staff, stakeholders, and/or City Councilmembers to reevaluate existing development-related procedures/processes, propose modifications, and implement workflow process improvements.
- Action Three: Following each survey and subsequent task force, provide update reports to the City's Housing Advisory Board, Planning Commission, and City Council regarding customer service improvement efforts. City Council will direct staff to add, modify, or eliminate processes that restrain or impede the production of housing.

Implements Policies: H-1.1, H-1.2, H-1.10, H-1.11, H-1.18, H-2.1

Timeframe: 2019-2027

Responsible Parties: Development Services and Public Works Staff

Funding: Departmental budget (no funding required; task consists only of staff time)

IMP H-6: Public Improvements Required (PIR) Evaluation and Update

Public Improvements Required (PIRs) consist of repairs to public infrastructure such as sidewalks, curbs, and alleys that are paid for by individual property owners. Under current City regulations, PIRs are triggered when a person applies for a building permit with a job value (labor and materials) in excess of $11,000. The $11,000 trigger applies to all combined projects within a rolling 12-month period. For instance, a $7,000 roof in June and a $5,000 bathroom remodel in September would trigger PIRs. Once this threshold is met, the subject property is required to be brought up to full conformance with City standards if the City determines that the infrastructure is deficient (e.g. the sidewalk is severely cracked and needs to be reconstructed). The intent of these requirements is to gradually add to or replace the City's street and alley infrastructure without government subsidies. However, in some cases the costs of PIR may discourage housing creation. For example, a hypothetical person that has budgeted $30,000 to convert a garage to an Accessory Dwelling Unit (ADU) might be informed that they need to replace a portion of the sidewalk and curb that runs along their property. The cost of the repair could exceed $15,000. In this case, the property owner may abandon the ADU project altogether due to the unforeseen increase in total project costs. This program requires a comprehensive review of the current regulations, a study of best practices from other California communities, and a redesign of the regulations to best balance the need to improve degraded infrastructure with the need to create housing. This program consists of two one-time actions:

- Action One: Create a taskforce of City staff, stakeholders, and/or City Councilmembers to evaluate existing regulations regarding PIRs, conduct a comprehensive review of the current best practices from other California communities, evaluate the implications of potential modifications, and develop a report of findings.
- Action Two: Staff will provide these findings to the Housing Advisory Board, Planning Commission, and City Council. City Council may direct staff to update policies and/or pertinent portions of the Eureka Municipal Code.

Implements Policies: H-1.3, H-2.1, H-2.10

Timeframe: 2020-2021

Responsible Parties: Development Services and Public Works

Funding: Departmental budget (no funding required; task consists only of staff time)

IMP H-7: Produce Housing-Development Related Educational/Promotional Materials

In early 2019, the Eureka City Council rescinded the entire Eureka zoning code and adopted an entirely new zoning code. The new code eliminated many regulations that held back the creation of housing, simplified many development procedures, and includes a substantial set of new development incentives. These new regulations/incentives must be advertised and promoted so property owners and the development community are aware that these new options are available.

For instance, the recently adopted code substantially advances opportunities for mixed use residential development in commercial zones including multi-story buildings with upper floor residential units, especially near transit stops. Mixed use residential developments have multiple advantages and can satisfy many of the goals and policies of the Housing Element. Residential units in dense multi-story buildings are likely to be smaller than other types of residential units, typically making them more affordable. Such development may also include a range of unit sizes, providing for a diverse mix of income levels in the same building. It is also possible for some or all of the units to be subdivided into condominium units, providing for opportunities for owner-occupied housing and, in some cases, affordable owner occupied housing. Mixed use residential developments are also typically closer to amenities, such as transit stops, entertainment opportunities, grocery stores, and other basic needs. Such proximity can reduce or eliminate the need for vehicle ownership, thereby enhancing overall affordability. According to staff analysis, such developments are likely to constitute a substantial portion of the overall housing units developed in Eureka in the coming 20 years.

Another example of a recently created regulatory option for housing creation is Small Lot Subdivisions, which provide an opportunity to develop additional single-family homes on already-developed lots. Small Lot Subdivisions are possible in multi-family residential zones and result in the creation of smaller-than-average developable lots (down to 2,000 square feet per lot). A typical example would be an existing small home (e.g. 1,200 square feet) on a standard City lot (e.g. 6,000 square feet). A portion of the lot (e.g. 3,000 square feet of the backyard) would be subdivided to provide a new buildable lot, which could then host a smaller (and therefore more affordable) 800-square-foot unit. Small Lot Subdivisions have a number of advantages and can satisfy many of the goals and policies of the Housing Element. This regulatory option can generate housing units in places where property owners formerly never saw such an opportunity (such as a large and unused back yard). As a consequence, the number of residences (i.e. the *actual* residential density) can gently increase in a neighborhood without a substantial alternation of the neighborhood fabric or demolition of existing structures. While Accessory Dwelling Units (ADUs) are on the same lot as their respective primary units and therefore cannot be sold, Small Lot

Subdivisions create legally separate lots, which means that they can be individually sold. Small lots are inherently more affordable than larger lots and host smaller housing units, which are also inherently more affordable. Accordingly, Small Lot Subdivisions are among the best means of creating owner-occupied affordable housing.

The State of California recently required all jurisdictions to allow ADUs in Residential zones. The City of Eureka has gone beyond State requirements and provides enhanced allowances for ADUs because they can satisfy many of the goals and policies of the Housing Element. A property owner that does not want to subdivide their backyard can instead build a small ADU as a rental unit. This option not only provides the property owner with a source of rental income, it also provides a smaller-than-average (and therefore typically more affordable) housing unit that did not previously exist.

Conservation Subdivisions are another recently created regulatory tool available in single-family residential zones. This option is valuable for parcels that have physical characteristics such as steep slopes and/or gulches that prevent or hinder traditional development. This regulatory option allows the owner of the property to preserve the unbuildable portions of the lot for conservation while shifting the development rights of the unbuildable portion to the buildable portion of the lot. The overall gross density of the parcel remains the same, but the net density of the buildable portion of the lot may be substantially higher than otherwise would be allowed.

Internal conversions and adaptive reuse of existing underutilized structures is another new regulatory option in the zoning code and is among the least expensive and most commonly pursued paths to create housing. Compared to new construction, development costs may be reduced because internal conversions take advantage of existing foundations, walls, and roofs. This type of develop has the additional benefit of reducing neighborhood impacts because new buildings are not being constructed; in many instances, adjacent property owners are not aware that a conversion has occurred or that a new housing unit has been created. Typical examples are converting unused garages to residential units or transforming vacant office spaces to residential units.

The City's new regulations also provide incentives for "Affordable-by-Design" housing, which consists of housing units that are less than 500 square feet and are not required to provide a dedicated off-street parking space. These units are naturally affordable, as opposed to being deed-restricted affordable. This is because, based on standard rental rates in Eureka, units that are less than 500 square feet are typically naturally to low and moderately low income households in Eureka (i.e. the rent for such units is often less than 30 percent of the income of low income households). These small units are typically most appropriate for one and two person households, which is a growing demographic sector in Eureka. Affordable-by-Design developments can consist of rental or

owner-occupied housing units and may be either attached (e.g. apartment building/condominiums) or detached (e.g. bungalow courts). Another advantage of small units is that they can lead to considerably more density. For example, an Affordable-by-Design development on a 6,000-square-foot lot may have twelve 500-square-foot units instead of six 1,000-square-foot units.

Finally, the newly adopted zoning code includes a number of local affordable housing density bonus options that go beyond the density bonuses afforded by State law. The City's local affordable housing density bonuses allow flexibility in development regulations and residential density for affordable housing built within a certain proximity of transit, schools, parks, and other similar amenities.

While all of the above new pro-growth and pro-housing regulations are now available in Eureka, these options will only lead to the stimulation of new housing development if information about these new regulations is broadcast to property owners, development professionals, and prospective developers. The intention of this program is to initiate the production of a range of educational and promotional materials. This program consists of four actions:

- Action One: Produce a list of the existing development regulations/ incentives that are most likely to stimulate the creation of housing and that property owners and private development professionals would find the most informative. The list is likely to include: small lot subdivisions, conservation subdivisions, opportunities for internal conversions, accessory dwelling units, live/work units, mixed use developments, dense multi-story developments with upper floor residential, tiny houses (including Appendix Q provisions), efficiency dwelling units, micro-units, shared housing, owner-occupied affordable housing, local/State affordable housing density bonuses, affordable-by-design incentives, parking reduction incentives, and opportunity zones.
- Action Two: Identify the education/promotional communication mediums that would be most effective at conveying to property owners and development professionals the list of development regulations/incentives produced above. In the first few years, the mediums most likely to be identified include: a new "Eureka Housing Regulations and Incentives" website with interactive mapping features, on-line videos, printed materials such as flyers and brochures, social media promotions, and direct mailings to property owners.
- Action Three: Produce custom educational/promotional materials for each of the above items utilizing the medium(s) most likely to stimulate housing. For instance, direct mailing of brochures may be the best method of promoting accessory dwelling units while a customized interactive, map-based website may be the best method

of promoting small lot subdivisions. Update educational/promotional materials as needed.

- Action Four: Make the materials produced above widely available. Ensure that staff is available on an on-going basis to respond to inquiries regarding development regulations, options, and incentives.

Implements Policies: H-1.7, H-1.8, H-1.9, H-1.12, H-1.15, H-1.16, H-1.17, H-2.1, H-2.2, H-2.3, H-2.4, H-2.5, H-2.6, H-2.7, H-2.9, H-2.10, H-2.11, H-2.12, H-2.13, H-3.1, H-3.2, H-3.3, H-3.4, H-3.5 H-4.2

Timeframe: 2020-2022

Responsible Parties: Development Services and Public Works

Funding: Departmental budget (no funding required; task consists only of staff time and costs of printing/mailing)

IMP H-8: Outreach and Training to Development and Real Estate Professionals

It is critical that local development and real estate professionals understand local development regulations, options, and incentives. As the City shifts to a more active role in helping to facilitate the creation of housing, the changing regulations need to be communicated regularly and accurately to professionals in the field. This program calls for comprehensive and ongoing outreach and education efforts, chiefly to help development professionals understand possible development scenarios. This program consists of four on-going actions:

- Action One: Generate and maintain a list of housing-related non-profits, realtors, design professionals, contractors, and other development and real estate professionals in Humboldt County. Update list annually.
- Action Two: At least once per year, distribute the City's housing-development related educational/promotional materials to individuals/organizations on the list.
- Action Three: At least once per year, present the City's housing-development related educational/promotional materials to industry groups (such as Realtor Associations, engineering associations, etc.).
- Action Four: Ensure that staff is available on an on-going basis to respond to inquiries regarding development regulations, options, and incentives.

Implements Policies: H-2.1, H-2.2, H-2.3, H-2.4, H-2.5, H-2.7, H-2.16

Timeframe: 2020-2027

Responsible Parties: Development Services and Public Works

Funding: Departmental budget (no funding required; task consists only of staff time)

IMP H-9: Residential Pre-Permitting Programs

The permitting and entitlement process can be expensive, time consuming, frustrating, and intimidating. In an effort to ease the challenges of the permitting process, Eureka will create and/or explore a number of techniques to provide pre-permitting options. Each of these options seeks to either eliminate an early-stage permitting requirement or to provide a no-cost permitting pathway. This program consists of three actions:

- Action One: Establish a Preliminary Site Plan Approval Program (PSPAP):
    - Staff and property owners will work together to produce parcel-specific reports and preliminary site plans for specific sites. The process will begin with Planning staff creating a report that outlines in detail all of the relevant development standards applicable to the site/parcel, describe all known and likely encumbrances and constraints (such as parking indentures or mapped wetlands), disclose the recorded permit history of the site (such as past variances), and describe in detail the full development potential of the site. Staff will then work with the applicant to review the report and sketch a number of conceptual site layouts. The applicant will then be required to hire an architect/engineer/draftsperson to develop one to three development scenarios based on the report and the conceptual site layouts. The City's Planning, Building, and Engineering Divisions will then provide comments on the development scenarios. The applicant will then have a detailed site report, a number of conceptual site layouts, one to three professional development scenarios, and written comments from various City departments. Collectively, these materials can be used by the applicant to market the property for sale and/or to raise investment funds to construct a future project at the site. For example, on a vacant site in a multi-family residential zone, staff would assist the property owner to analyze the site and then create conceptual site layouts for a single-structure six-plex, a bungalow court with six standalone separate buildings/units, and a small lot subdivision with three duplex units. The property owner could then use these materials to advance their own development with greater confidence, or to market their property.
- Action Two: Pre-approved Accessory Dwelling Unit (ADU) Plans Program: Create a taskforce of City staff, staff from other agencies, stakeholders, Housing Advisory Board members, and/or City Councilmembers to evaluate the value and effectiveness of establishing a "Pre-approved ADU Plans Program" (Program). If pursued, City and agency representatives would hire an architect(s) to develop at least three unique sets of site/building plans for ADUs. The plan sets would need to be generic enough to be adaptable to

any applicable parcel in the City, but specific enough to comply with the development standards of the City and other participating agencies, as well as the California Building Code. The plans would be approved by all relevant departments of the City and would then be freely available to the general public. Anyone interested in building an ADU could then select the free pre-approved plan set that best fit their individual needs, hire a design/development professional to customize the plans as needed to fit their specific site, and then submit the revised plans to the City. The objective of the Program would be to reduce the costs and time required to develop an ADU, but staff experience indicates that such a Program may not be particularly effective at accomplishing these objectives. The taskforce will estimate the likely costs to be incurred by the City in developing the pre-approved plans, research best practices from other communities with similar programs, determine the degree to which similar programs from other communities are actually utilized, evaluate the likelihood that such a Program would actually be utilized in Eureka, and develop a report and recommendation for City Council. The report and recommendation will then be provided to City Council.

- Action Three: Acquire funding to complete a Downtown Specific Plan and complete a CEQA analysis for the development of specific high-priority parcels, with particular emphasis on creating dense multi-story developments with upper floor residential units.

Implements Policies: H-1.6, H-2.1, H-2.2, H-2.7, H-2.9, H-2.10, H-2.11, H-2.13, H-3.3

Timeframe: 2020-2021(Action 1); 2021-2022 (Action 2); 2020-2021 (Action 3)

Responsible Parties: Development Services and Public Works

Funding: Departmental budget (no funding required; task consists only of staff time)

IMP H-10: Downtown Parking Management Plan

Pursue the creation of a Downtown Parking Management Plan that will be a comprehensive document providing recommendations regarding the most efficient and economically viable ways to manage the fixed amount of on-street and off-street parking spaces located in Downtown Eureka. This is important for the future development of multi-story buildings in the Downtown area because there is simply not enough space to construct large private parking facilities without demolishing existing structures. Because the 2040 General Plan clearly establishes a community vision that prioritizes the preservation and rehabilitation of structures while also promoting dense infill mixed-use development, an alternative path forward must be devised. A key purpose of the plan will be to project the likely individual impacts of specific developments and well as the combined impacts of successive developments over time. For example, a

series of multi-story apartment buildings built over a 10-year period would each have its own unique impacts on the parking supply both in the entire Downtown area and on the blocks immediately surrounding the development, depending on when it was built and its exact location. The Downtown Parking Management Plan would provide a suite of regulatory procedures and thresholds for City staff to use to effectively accommodate new development without being inappropriately permissive or restrictive. Further, because the preservation and expansion of coastal access is an important concern in Old Town, the data, procedures, and thresholds contained in the Downtown Parking Management Plan will serve to inform the decisions involved in the Local Coastal Program Update. The LCP update process is currently ongoing and anticipated to be complete in the coming two years. City staff will use the data to support various pro-housing development standard updates proposed in the Local Coastal Program.

The plan will contain an inventory of available parking, data on usage rates by different users both by location and by time of day, an analysis of the most effective locations in which to charge for parking, and a detailed consideration of what actions the City can do to manage parking in a complex mixed-use environment with retail/office uses on the ground floor and residential/office uses on the upper floors. The plan will prescribe the most appropriate ways that the City can use tools such as parking permits, parking meters, and parking enforcement to facilitate the best parking-related outcomes for all residents and day-time visitors to downtown. This program calls for the creation of such a plan that would provide a parking management roadmap into the future as Eureka continues to infill. This program consists of three one-time actions:

- Action One: Secure funding.
- Action Two: Release RFP seeking a consultant to complete the Parking Management Plan.
- Action Three: Complete and implement plan, incorporating recommendations throughout all City departments.

Implements Policies: H-1.7, H-1.9, H-2.2, H-2.20
Timeframe: 2019-2020
Responsible Parties: Development Services and Public Works
Funding: SB-2 Planning Grant

IMP H-11: Developable Lands Inventories and Recruitment

The City of Eureka contains approximately 10,000 parcels. While the majority of these parcels are either fully developed (i.e. contain existing residential or multi-story buildings) or are undevelopable (i.e. contain extensive coastal wetlands), some parcels in the City are either entirely

vacant or have not reached their full development potential. These developable lands fall into two primary categories: publicly-owned and privately owned.

Publicly owned lands can provide a substantial opportunity for the development of housing because in these cases government entities have direct control over the development of the site instead of merely indirect regulatory control. Privately-owned lands also present significant opportunities for the creation of housing. While the City's control of such lands is limited to regulatory limitations, the City can have a significant role in stimulating, encouraging, or incentivizing private property owners to pursue development options. This program calls for an extensive analysis of all parcels in the City, the creation of a detailed inventory of all parcels that contain the potential of hosting new housing units, and active recruitment of property owners with the objective of stimulating housing development.

Through the inventory and recruitment process, the City will also ensure that adequate sites are available (as defined by state housing element law, Government Code Section 65583) to accommodate the City's Regional Housing Needs Allocation (RHNA) for all income groups. Each year, as part of the City's annual evaluation of its implementation of the General Plan, the City will monitor the City's progress in meeting the RHNA with production and remaining capacity in development potential in relation to the City's RHNA. This effort will be directly tied into the inventory and recruitment processes.

This program consists of four on-going actions:

- Action One: Analyze all parcels in the City and then create/maintain an inventory of all parcels that contain the potential of hosting new housing units.
- Action Two: Utilizing the City's housing development site inventory, identify high-priority publicly-owned sites that have the best potential of hosting the types of housing most needed in the City and/or the sites that have the best potential of hosting the greatest number of units. For each site, conduct basic site constrains analyses and evaluate the potential for a range of development options. Then, contact appropriate agencies, share preliminary analyses and concepts, and discuss sale/development interest. Where appropriate, also share the City's educational and promotional materials.
- Action Three: Utilizing the City's housing development site inventory, identify high-priority privately-owned sites that have the best potential of hosting the types of housing most needed in the City and/or the sites that have the best potential of hosting the most units. For each site, conduct basic site constrains analyses and evaluate the potential for a range of development options and incentives, such as: small lot subdivisions, conservation subdivisions, internal conversions, accessory dwelling units, live/work units, mixed use

developments, dense multi-story developments with upper floor residential, tiny houses, efficiency dwelling units, micro-units, shared housing, owner-occupied affordable housing, local affordable housing density bonuses, affordable-by-design incentives, parking reduction incentives, opportunity zones, and other housing-friendly regulatory options. Based on the analyses, develop preliminary development concept drawings. Contact the owners of each high priority site, share preliminary analyses and concepts, and actively encourage owners to build or sell. Where appropriate, also share the City's educational and promotional materials.

- Action Four: Maintain RHNA site inventory, evaluating and counting each development that creates housing on all parcels identified in the Housing Element.

Implements Policies: H-2.2, H-2.3, H-2.4, H-2.5, H-2.7, H-2.9, H-2.11, H-2.12, H-3.1, H-3.3,

Timeframe: 2021 (Action 1) 2022 (Action 2) 2023 (Action 3), 2019-2027 (Action 4)

Responsible Parties: Development Services Department

Funding: Departmental budget (no funding required; task consists only of staff time)

IMP H-12: Accessory Dwelling Unit Assistance Program

Of the approximately 10,000 parcels in the City of Eureka, nearly six thousand of the parcels are zoned single-family residential. While the vast majority of these parcels already contain a single-family residential structure, these 6,000 parcels still constitute one of the most significant opportunities for the production of housing units in Eureka because each parcel is permitted to contain an Accessory Dwelling Unit (ADU). Of all the strategies Eureka is employing to stimulate the creation of housing, ADUs may constitute the single biggest long-term opportunity for housing production and are also likely to be one of the best methods of creating "affordable-by-design" rental housing units. Accordingly, this Program focuses on providing enhanced and focused assistance to property owners of single-family residential properties with the objectives of promoting ADUs and simplifying the process of developing ADUs to the greatest degree possible. The ADU target creation rate is 36 per year (288 total during the planning period). See Table 51 *Summary of Non-Site Specific Housing Targets* in the Technical Appendix for more detail.

This program is also supported by and complementary to the following Implementation Programs:

- Pre-approved ADU Plans Program (under Residential Pre-Permitting Programs)

- Ongoing Evaluation and Refinement of Permit Fees and Utility Connection Fees
- Produce Housing-Development Related Educational/Promotional Materials
- Adopt Building Code Appendix Q (Tiny House Provisions)
- Explore Allowing Tiny Houses on Wheels (THOWs)

This program consists of five on-going actions:

- Action One: Unpermitted ADU Amnesty Program: Staff will investigate the potential for an ADU amnesty program, creating a report and presenting it to City Council for further direction. Unpermitted unit amnesty programs have been explored throughout the state and have achieved varying levels of success.
- Action Two: ADU Ambassadors Program: Financing the construction of ADUs is among the most significant barriers to the creation of ADUs. The various financing mechanisms can be confusing and overwhelming for average homeowners unaccustomed to substantial development projects. This program consists of the creation of an ADU educational program directed at local banks, credit unions, and other funders. Local financial institutions will be encouraged to appoint "ADU Ambassadors," who will be local representatives within local financial institutions. Each Ambassador will complete an educational program hosted by Eureka city staff. The Ambassadors will then serve as the primary point of contact at each of their respective institutions for home owners interested in financing and constructing an ADU. Development Services staff will maintain this list of ADU Ambassadors and will distribute the list to interested homeowners that come to the City seeking information about ADUs.
- Action Three: Explore ADU Fee Reductions: Permit fees can add substantially to ADU development costs. Fees include building permit fees, utility connection fees, and impact fees. Some fees are required by law for cost recovery purposes, while others may be able to be reduced. In association with the Implementation Program "Ongoing Evaluation and Refinement of Permit Fees," the City will explore options for reducing and/or eliminating certain fees in certain instances to make ADU development more affordable.
- Action Four: Annual Prefab Research Report: Prefabricated housing often costs less to construct than site-built housing and may provide a means to create ADUs more affordably. However, the type and number of prefabricated housing manufacturers varies from year-to-year and shipping proves challenging for north coast customers. New firms start, others go out of business, and others regularly reconfigure the products that they offer. The program tasks the Development Services Department to research the topic once annually and create a brief (approximately two page) report. The

contents of this report will be provided to property owners interested in creating an ADU.

- Action Five: Enhanced Outreach and Recruitment: Given the substantial opportunity that ADUs provide for the creation of new housing units in Eureka, extra effort will be invested into outreach and recruitment. Building on efforts established under other Implementation Programs (such as "Pre-approved ADU Plans Program" and "Produce Housing-Development Related Educational/ Promotional Materials") the City will periodically provide mailers to owners of eligible parcels in an effort to stimulate the creation of new ADUs.

Implements Policies: H-1.6, H-1.16, H-1.21, H-2.2, H-2.10, H-3.1

Timeframe: 2023-2024 (Action 1); 2020 (Action 2); 2020 (Action 3); 2020-2027 (Action 4); 2021-2027 (Action 5)

Responsible Parties: Development Services and Public Works

Funding: Departmental budget (no funding required; task consists only of staff time)

IMP H-13: Adopt Building Code Appendix Q (Tiny House Provisions)

An upcoming update to the California Building Code may allow smaller minimum interior dimensions for dwelling units. This is being done to address the growing interest in living in small housing units (i.e. "tiny houses"). Chief among the frustrations for those building small living quarters are the restrictions on the minimum heights of sleeping lofts and restrictions on the use of steep stairs/ladders. This program calls for the City to pursue adopting these updated building codes when they are adopted by the State, to make it easier for people to build code-compliant compact housing. This program consists of two one-time actions:

- Action One: Maintain awareness of the current regulations contained in the California Residential Code.
- Action Two: The Development Services Department and the Building Division will work together to pursue the local adoption of compact housing provisions, taking appropriate actions as necessary.

Implements Policies: H-1.12, H-1.13, H-2.2

Timeframe: 2019-2020

Responsible Parties: Development Services and Public Works

Funding: Departmental budget (no funding required; task consists only of staff time)

IMP H-14: Explore Allowing Tiny Houses on Wheels (THOWs) as Residential Units

A Tiny House on Wheels (THOW) is a small structure built on a utility trailer and legally classified as a recreational vehicle (RV) and, as such, must comply with the California Vehicle Code and must be licensed by the Department of Motor Vehicles. According to National Fire Protection Association, Standard on Recreational Vehicles (NFPA 1192), the maximum size for an RV (and thereby a THOW) is 400 square feet. The water, wastewater, and electrical connections are the same as for RVs. RVs have traditionally been used for temporary recreational purposes and, per the Eureka Municipal Code, may not be used as permanent housing. This program explores the possibility of allowing THOWs to be a permitted regulatory option as permanent housing in limited circumstances. This program consists of two one-time actions:

- Action One: Create a taskforce of City staff, stakeholders, and/or City Councilmembers to evaluate existing policy/regulations regarding THOWs, conduct a comprehensive review of the current best practices from other California communities, evaluate the implications of potential allowances, and develop a report of findings.
- Action Two: Provide these findings to the Housing Advisory Board, Planning Commission, and City Council. City Council may direct staff to update policies and/or pertinent portions of the Eureka Municipal Code. Develop and require design standards for Tiny Houses on Wheels wherever they are allowed to serve as residential units.

Implements Policies: H-1.12, H-1.13, H-1.14, H-2.2, H-2.17

Timeframe: 2022

Responsible Parties: Development Services and Public Works

Funding: Departmental budget (no funding required; task consists only of staff time)

IMP H-15: Motel Conversions to Affordable Housing

Eureka contains some motels that periodically or regularly function as housing, rather than traveler accommodations. Often, the Humboldt County Department of Health and Human Services (DHHS) provides subsidies to some of the individuals living in these motels. In fact, DHHS relies on some motels in Eureka as a source of housing for some of the agency's programs. If these motels were converted to genuine housing units, the sites may more efficiently and effectively serve the needs of the residents and DHHS. In some cases, the location, physical design, and layout of these developments lend themselves well to conversion to housing. Coincidentally, some of these motels have chronic and re-occurring code enforcement violations and/or very frequent calls to the Eureka Police Department. Converting the facilities from motels to housing may alleviate these challenges to some degree. The City will

evaluate each motel in town, review Code Enforcement and Police Department records, and coordinate with DHHS to understand the agency's interests. The City will then reach out to select motel owners to help the owners explore the potential options for conversion to residential uses. Where appropriate, conversions can focus on housing for seniors, low- and moderate-income households, or special needs housing. On a case-by-case basis, the City will work with property owners and/or a nonprofit agency or developer, if approached, to convert one or more of these older motels to residential use and will make use of Housing Successor (former Redevelopment Funds), Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and other similar funds/programs to assist in the rehabilitation of these units. This program consists of the following on-going actions:

- Action One: Development Services Staff will evaluate every hotel in town and then create list of candidate motels based on Transient Occupancy Tax (TOT) payments, Code Enforcement engagements, and Eureka Police Department records.
- Action Two: Development Services Staff will contact candidate motel owners at least every three years to gauge interest. Staff will work on a case-by-case basis to facilitate the conversions.

Implements Policies: H-1.12, H-2.2, H-2.14, H-6.1, H-6.2, H-6.2, H-6.4

Timeframe: 2020-2027 (Action 1 is repeated annually; Action 2 will occur in 2023 and 2026)

Responsible Parties: Development Services, Public Works, Code Enforcement, and the Police Department

Funding: Housing Successor Funds, HOME funds, CDBG funds, or alternative funding source

IMP H-16: Maintain and Establish Relationships with Low Income Housing Developers and Subsidized Housing Developers and Pursue Funding for Affordable Housing

Close relationships between the City and affordable housing developers are critical for the continued production of deed-restricted affordable housing units. This program sees the City continue to maintain a relationship with these housing creators and to stay abreast of the ever-changing development environmental. To facilitate and support the development of subsidized housing units, the City will maintain, establish, and nurture partnerships with non-profit and for-profit developers that specialize in subsidized housing and low income housing. Where appropriate, the City will assist with site identification, land acquisition, financing, permitting, and technical support. Specifically, the City will collaborate with developers to optimize their eligibility for financing under various federal, State, County, and private programs,

such as Community Development Block Grant (CDBG), the Low-Income Housing Tax Credit program, and others. City Staff will also work with housing developers to promote ownership opportunities for low- and moderate-income households by providing technical assistance through the entitlement process and making funding available for Council-approved subsidized housing projects. Finally, whenever feasible, Eureka will consider using available City-owned properties as subsidized housing sites. If and when City owned sites are made available, they will be advertised to affordable housing developers. Additionally, the City will pursue available State and Federal affordable housing funding sources, many of which are only accessible through Humboldt County (typically the County Department of Health and Human Services). This program consists of four on-going actions:

- Action One: Maintain a regularly-updated list of federal, State, County, and private affordable housing funding programs and sources. Work closely with Humboldt County Department of Health and Human Services to understand the opportunities for acquiring such funding.
- Action Two: Issue a press release once every other year indicating the City is seeking to generate a list of all property owners, developers, and development professionals that are interested in seeking funding for and/or building affordable housing in Eureka. Conduct research and outreach to identify individuals/organizations that have successfully developed affordable housing in the general region. Based on the above, create and maintain a list of affordable housing property owners, developers, and development professionals.
- Action Three: Distribute pertinent educational/promotional materials to each individual/organization on the list. Meet with individuals/ organizations as requested and appropriate.
- Action Four: As projects are submitted, offer to review project budgets to ensure that each individual/organization is utilizing all available funding and is leveraging funds to the maximum extent possible.

Implements Policies: H-1.5, H-1.15, H-1.18, H-2.13, H-2.16, H-2.18, H-2.19, H-5.2, H-5.3, H-5.7, H-6.1, H-6.2, H-6.3

Timeframe: 2019-2027

Responsible Parties: Development Services

Funding: Departmental budget (no funding required; task consists only of staff time)

IMP H-17: Monitor and Preserve Existing At-Risk Units

The City will continue to keep an inventory of affordable housing units and promote the use of additional affordable housing assistance

programs, as appropriate, to preserve existing affordable units that are at risk of converting to market-rate. This is to be accomplished by working with public and/or private housing agencies that have expressed an interest in rights-of-first-refusal for publicly assisted housing projects at-risk of conversion to market-rate housing; and by establishing a monitoring program for local Section 8 contracts including an early warning system for units at risk of being converted to market-rate. When available, the City will utilize resources such as HUD Section 208/811 loans, HOPE II and III Homeownership program funds, HOME funds, Community Development Block Grant (CDBG) funds, Low-Income Housing Tax Credit Programs, California Housing Finance Agency single-family and multi-family programs, programs to stimulate private developer and nonprofit entity efforts in the development and financing of housing for low- and moderate-income households. The City will facilitate discussions between developers and local banks to meet their obligations pursuant to the California Community Reinvestment Act (CCRA) by providing favorable financing to developers involved in projects designed to provide low- and moderate-income housing opportunities. Similarly, the City will maintain a list of mortgage lenders participating in the California Housing Finance Agency (CHFA) program and refer the program to builders or corporations interested in developing housing in the City. This program consists of six on-going actions:

- Action One: Maintain inventory of deed-restricted affordable housing.
- Action Two: Rights of first refusal for publicly-assisted housing developments
- Action Three: Monitoring program from Section 8 contracts
- Action Four: Utilize funding sources for affordable housing including purchasing affordability covenants
- Action Five: Facilitate conversions between lenders and developers regarding CCRA

  Action Six: Maintain list of mortgage lenders participating in CHFA.

Implements Policies: H-2.18, H-2.19, H=3.4, H-3.5, H-6.1, H-6.2, H-6.3
Timeframe: 2019-2027 (combined annual report for all actions)
Responsible Parties: Development Services
Funding: Departmental budget (no funding required; task consists only of staff time)

IMP H-18: Housing for Special Needs Populations

It is important that special needs populations such as the elderly, persons with disabilities, persons with developmental disabilities, large families, farmworkers, families with female-headed households, families and persons in need of emergency shelter, and extremely low-income households have access to safe, affordable housing. The City will

continue to work with affordable housing developers, seek out funding, and pursue all available means to create housing for these populations. The City intends to incentivize the creation of at least 50 housing units to serve the special needs population by the below-listed actions. This program consists of three on-going actions:

- Action One: Continue to support affordable housing developers by maintaining consistent contact and open dialogue on an on-going basis.
- Action Two: Study the need and feasibility of specific zoning tools that would encourage the creation of housing for special needs populations.
- Action Three: Review and prioritize funding.
- Action Four: Create and maintain available at the planning counter a brochure that explains the reasonable accommodation procedure. Distribute brochures to local organizations that work with disabled persons.

Implements Policies: H-1.5, H-1.15, H-1.18, H-2.13, H-2.16, H-2.18, H-2.19, H-2.22, H-3.4, H-3.5, H-4.6, H-5.2, H-5.3, H-5.7, H-6.1, H-6.2, H-6.3, H-6.4

Timeframe: 2019-2027 (Actions 1 and 3), 2024 (Action 2), 2023 (Action 4)

Responsible Parties: Development Services

Funding: Departmental budget (no funding required; task consists only of staff time)

IMP H-19: Promote Historical Building Code

The Historical Building code is a valuable tool for the preservation of historic buildings. It is contained in state statute and is intended to facilitate the rehabilitation and repurposing of older buildings in ways that meet modern needs but without compromising safety. As a city with a large number of historic structures, Eureka is well suited to take advantage of these provisions. This program calls for the City to ensure that staff from various departments are trained on the use of the Historical Building Code and actively promote it to project applicants. This program consists of two on-going actions:

- Action One: Provide periodic training to staff on the applicability and potential uses of the Historical Building Code.
- Action Two: Actively promote the use of the Historical Building Code when applicable.

Implements Policies: H-2.2, H-4.2, H-4.3

Timeframe: 2019-2027

Responsible Parties: Development Services and Public Works

Funding: Departmental budget (no funding required; task consists only of staff time)

IMP H-20: Code Enforcement

Code enforcement is essential to ensuring housing preservation and rehabilitation. To maintain the existing housing stock, the City will enforce local zoning; housing, fire, and building codes; and standards for landscaping to maintain safe and decent housing. Property owners with code violations who meet eligibility requirements for participation in programs administered by the City will be offered an opportunity to correct code violations. The primary goal of this program is to provide reasonable controls for the maintenance, rehabilitation, preservation, and conservation of existing commercial and residential properties. This program consists of two on-going actions:

- Action One: Maintain as a minimum, current staffing levels in the Code Enforcement Division.
- Action Two: Enforce and expand where necessary, the property maintenance provisions embodied in the California Green Building Code and the Zoning Ordinance in order to conserve and improve the quality of housing units in the City.
- Action Three: Code enforcement officers will provide materials to residents and property owners informing them of available resources to assist them in remedying code violations.

Implements Policies: H-1.21, H-4.3, H-4.4, H-4.7, H-4.8, H-4.9, H-5.5, H-5.6, H-5.8, H-6.1, H-6.2, H-6.3, H-6.4

Timeframe: 2019-2027

Responsible Parties: Code Enforcement

Funding: Departmental budget (no funding required; task consists only of staff time)

IMP H-21: Prevention of Demolition-by-Neglect Program Exploration

Low-income rental housing is frequently lost due to negligent property owners that fail to maintain their properties. The City's Code Enforcement division works diligently to address the worst problems, though in some cases additional actions may be taken. The current system for selecting properties for abatement relies on a points system which uses citizen complaints and police calls to select properties. Other additional methods of identifying properties may exist, potentially being applied to a specified geographic area, and based on exterior inspections (e.g. "windshield survey). Potential solutions may involve a rental registry program that requires interior inspections. This program would see the City explore all

available options to prevent the loss of housing by neglect. This program consists of two on-going actions:

- Action One: Create a taskforce of City staff, stakeholders, and/or City Councilmembers to evaluate existing policy/regulations regarding property maintenance condition, conduct a comprehensive review of current best practices from other California communities, evaluate the implications of potential expanded efforts, and develop a report of findings.
- Action Two: Staff will provide these findings to the Housing Advisory Board, Planning Commission, and City Council. City Council may direct staff to update policies and/or pertinent portions of the Eureka Municipal Code.

Implements Policies: H-2.18, H-2.19, H-4.3, H-4.4, H-4.8, H-4.9, H-5.5, H-5.6, H-5.8, H-6.1, H-6.2, H-6.3, H-6.4

Timeframe: 2024-2025

Responsible Parties: Development Services and Code Enforcement

Funding: Departmental budget (no funding required; task consists only of staff time)

Imp H-22: Limit Number of Vacation Rentals and Compliance Drive

Vacation rentals are relatively common in Eureka. They have traditionally provided an alternative to hotels for people who planned to stay for longer periods of time (e.g. 10 days), or for visitors needing extra space (e.g. family reunions). Historically, vacation rentals were typically only located in areas of high touristic value, such as beachside communities. However, with the advent of smart phone apps and the sharing economy, operating vacation rentals from individual residences has become very easy. Changing consumer expectations meant that a broader range of people were interested in "vacation rentals," such as solo travelers or people seeking to stay for only one night. Parallel to the rise in short term vacation rentals was a shortage of housing, which means that housing in general is not as plentiful or affordable as residents need. A concern has arisen that if a residence is being used to serve vacationers, then it is no longer providing housing to locals. The City of Eureka recognizes the need to balance these two important land uses. For this reason, City Council directed staff to update the vacation rental related provisions in the zoning code, institute a cap on the total number of vacation rentals in residential zones, and to pursue a compliance drive to ensure that all vacation rentals are safe and pay the required Transient Occupancy Tax ("bed tax"). This program consists of three on-going actions:

- Action One: Hire a specialized consultant to locate the address of every vacation rental in Eureka and generate a list.

- Action Two: Cross check the list with all permitted vacation rentals. For those vacation rentals that are not permitted, send certified letters indicating that permits must be acquired within a limited grace period.
- Action Three: At the end of the grace period, present a report to City Council, disclose the number of permitted vacation rentals, inform the unpermitted facilities of their violation and provide them with a list of required next steps, and recommend to City Council a cap for the total number of full unit vacation rentals in residential zones. City Council will then pass a resolution establishing a cap.

Implements Policies: H-5.1

Timeframe: 2020

Responsible Parties: Development Services and Finance

Funding: Departmental budget (no funding required; task consists only of staff time)

Imp H-23: Weatherization, Energy Efficiency, and Green Building Techniques

The City will continue to review building plans for conformance with state energy efficiency standards and will encourage and support energy-efficiency improvements for existing and proposed housing units. The City will promote currently available weatherization and energy conservation programs to residents, as well as evaluate the use of "green" energy efficient and environmentally sensitive construction techniques, amending the building code as appropriate. Staff will continue to maintain awareness of new legislation and green building processes.

To assist developers, the City will refer developers to green code and green rehabilitation manuals such as the U.S. EPA's Sustainable Solutions for Historic Houses in Northern California. These manuals provide information and identification of alternative and/or sustainable building methods and materials used for the treatment of Eureka's older housing stock. Additionally, whenever possible the City will encourage and support energy-efficiency improvements and modifications for existing and proposed subsidized housing units and low income households.

The City will post and distribute information on currently available weatherization and energy conservation programs. Within Eureka, the Redwood Community Action Agency and the Redwood Coast Energy Authority provide weatherization services to both renter and owner-occupied households. The Weatherization Program provides high quality energy efficiency and weatherization services for income qualified low- to

moderate-income households. Staff will provide information on applicable programs online and at City Hall.

The City will continue to evaluate the use of "green" (energy efficient and environmentally sensitive) alternative building methods and materials to coincide with the periodic adoption of codes at the State level. City staff will evaluate the feasibility of using alternative building methods and materials, taking compliance with state building codes and Eureka's maritime climate into account. Where feasible and appropriate, the City will revise the Building Code to allow use of alternative building methods beyond the minimum requirements of Title 24.

This program consists of three on-going actions:

- Action One: Continue to encourage and enforce state energy efficiency standards and energy-efficiency improvements. Encourage residential developers to maximize energy conservation through proactive site, building and building systems design, materials and equipment to maximize energy efficiency that exceeds the provisions of Title 24 of the California Building Code. Assist developers accessing passive design resources with brochures and using the City website. Encourage use of upgraded insulation, advanced air infiltration reduction practices (air sealing), and low emissivity (Low-E) double-pane windows. Promote use of energy efficient lighting including fluorescent Provide information about available weatherization programs at City Hall, on the City's website and in other public places to increase awareness. Increase opportunities for and/or remove constraints to green-building in multi-family residential projects. Support building framing that promotes construction of tighter building envelopes with maximum height and sky exposure plans and minimum setbacks. Continue to refer developers to green code and green rehabilitation manuals.
- Action Two: Continue to promote weatherization and energy conservation programs. Continue to post and distribute information on currently available weatherization and energy conservation programs.
- Action Three: Require the use of Energy Star appliances and materials in subsidized housing developments. Continue to encourage and support energy-efficiency improvements and modifications for existing and proposed subsidized housing units and low income households. Where feasible, study the feasibility of raising energy efficiency standards for publicly funded projects.

Implements Policies: H-4.1, H-5.6, H-5.8, H-6.1, H-6.2, H-6.3, H-6.4
Timeframe: 2019-2027
Responsible Parties: Development Services and Public Works
Funding: Departmental budget (no funding required; task consists only of staff time)

IMP H-24: Promote Mills Act

A Mills Act agreement is an agreement between the City and the owner of a historic structure that allows for a reduction in property taxes in exchange for legal commitment to utilize the savings to finance pre-approved property improvements. These property tax reductions can ease the cost burden of restoring historic structures and serve to preserve historic buildings. This program consists of two on-going actions:

- Action One: Develop educational/informational materials that explain how Mills Act contracts work and the benefits that they provide.
- Action Two: Distribute materials to eligible property owners.

Implements Policies: H-4.2, H-4.3
Timeframe: 2026-2027
Responsible Parties: Development Services
Funding: Departmental budget (no funding required; task consists only of staff time)

IMP H-25: Various Housing Assistance Programs

Over the past several decades, the City has administered a number of housing acquisition, homeownership assistance, and residential rehabilitation programs. Many of the programs were funded by the City's Redevelopment Agency, which was dissolved in 2012 and is therefore no longer an option for funding such programs. Other programs have been funded by competitive funding sources administered by State/Federal agencies, such as CDBG, HOME, CalHOME, HCD, and others. However, in recent years the eligibility criteria for these competitive State programs have become increasingly infeasible in Eureka. For instance, the City acquired over one million dollars in CDBG homeownership Assistance grant awards from 2012 and 2016. The City expected to issue up to 14 homeownership assistance loans with the combined 2012 -2016 grant awards loans from the award. However, despite extraordinary effort and outreach, the City was only able to provide seven homeownership loans from the two CDBG grant awards. While the City screened over 120 interested applicants, HCD program guidelines forced the City to disqualify all but seven of the applicants. In addition, HCD program guidelines regarding home prices were out of alignment with actual housing costs in Eureka and only seven homes fell within the limited range of purchase price required by HCD. Accordingly, until the State reforms its program guidelines, the State competitive funding sources may not be viable in Eureka. Effectively, these programs have been suspended by the City.

Fortunately, some of the legacy programs previously administered by the City included revolving loan funds, which means that incoming loan

payments will provide some on-going funding sources to continue some of these programs. For instance, a CalHOME repaid loan provided the City with enough revenue (program income) to issue one owner occupied rehabilitation program loan. In addition, repaid loans from the State Rental Rehabilitation Program provided the City with enough revenue (program income) to issue two loans for rehabilitation of two Multi-Family low income rental units, one a six-plex and the other an eight-plex.

Another successful past program was the "Graffiti Clean-up Kit Program," which was sponsored by the City in cooperation with a privately-owned hardware store in Eureka. The intent of the program was to assist property owners with the removal of graffiti from residential neighborhoods. To be eligible, applicants were required to be owner-occupied residents of a single-family dwelling within the city limits. Eligible applicants then obtained a voucher for a kit from the hardware store. Graffiti Clean-up kits typically consisted of: color matching services by the hardware store staff, paint, a paint brush, clean up cloth, drop cloth, stir stick, and a "wet paint" sign. This program provided local residents with a valuable tool to help preserve their neighborhood when property defacement occurred. Additionally, the City provides approximately twenty dumpsters annually for residential neighborhood and code enforcement cleanup efforts.

The City will continue to administer some housing assistance programs as funding is made available through the accrual of incoming loan payments. The City will also monitor opportunities to reinstate some programs when viable State/federal funding/programs become available. This program consists of seven on-going actions:

- Action One: Homeownership Assistance Loan Programs. The City will monitor State and Federal grant/loan programs associated with homeownership assistance and residential rehabilitation assistance. The City will seek to acquire grants/loans when the terms of such programs are viable in Eureka. The City will also maintain an interest list of individuals that may seek such grants/loans in the future.
- Action Two: Owner-occupied Rehabilitation Program. The City will monitor State and Federal grant/loan programs associated with owner-occupied rehabilitation assistance. The City will seek to acquire grants/loans when the terms of such programs are viable in Eureka. The City will also maintain an interest list of individuals that may seek such grants/loans in the future.
- Action Three: Multifamily and Rental Rehabilitation Program. The City will monitor State and Federal grant/loan programs associated with multifamily and rental rehabilitation assistance. The City will seek to acquire grants/loans when the terms of such programs are viable in Eureka. The City will also maintain an interest list of individuals that may seek such grants/loans in the future.

- Action Four: Senior Home Repair Grant Program. The City will monitor State and Federal grant/loan programs associated with Senior home repair and rehabilitation assistance. The City will seek to acquire grants/loans when the terms of such programs are viable in Eureka. The City will also continue to provide funding annually from the City's LOCAL funding program's repaid loans to provide funding for administration of this program by Humboldt Senior Resource Center who provides the services to low income seniors who require eligible small home repairs to remain safely in their homes. The City will work with the Humboldt Senior Resource Center to maintain an interest list of individuals that may seek such grants/loans in the future.
- Action Five: Wheelchair Ramp Grant. The City will monitor State and Federal grant/loan programs associated with wheelchair ramp grants and other ADA infrastructure rehabilitation/construction grants. The City will seek to acquire grants/loans when the terms of such programs are viable in Eureka. The City will also maintain an interest list of individuals that may seek such grants/loans in the future.
- Action Six: Graffiti Clean-up Kit Program. The City will explore opportunities to reinstate, expand, and advertise this program.
- Action Seven: Dumpster Grant Program. The City will maintain a relationship with Recology (Eureka's solid waste and recycling provider), provide promotional materials, and actively promote participation in the program.

Implements Policies: H-2.18, H-2.19, H-3.4, H-3.5, H-4.4, H-4.5, H-5.3, H-5.6, H-5.8, H-6.7

Timeframe: 2020-2027

Responsible Parties: Development Services

Funding: Department budget and various local, state, and federal funding sources

IMP H-26: Vacant Home Outreach and Exploration of Vacancy Tax

According to the Census Bureau, Eureka had 296 vacant housing units in 2010. This number did not include homes that were vacant due to being for sale or homes that were used seasonally (e.g. summer homes). Public concerns over long-term vacancies are frequently brought to the City's attention, as vacant properties often become dilapidated and are a target for squatters. This program requires staff to reach out to owners of vacant homes to determine the cause of vacancies and to assist the owners in returning properties to the City's active housing stock. Depending on the success of the outreach effort, the City may explore the potential for taxes, fines, or punitive actions against property owners

who keep their properties vacant long term. This program consists of two on-going actions:

- Action One: Send letters of inquiry to all properties with residential units that appear vacant, as evidenced by a lack of municipal water usage.
- Action Two: Explore means of compliance for property owners that continue to maintain vacant residential units in the long term and provide a recommendation report to City Council.

Implements Policies: H-5.3, H-5.4, H-5.5
Timeframe: 2023
Responsible Parties: Development Services
Funding: Departmental budget

IMP H-27: Update Eureka's Homeless Strategy

Humboldt County and the City of Eureka have a higher than average rate of homelessness relative to other regions of the State. In recognition of the importance of this issue to the community, the City has worked diligently to understand the issues surrounding homelessness and to work toward lasting solutions. The following are milestones in the City's progress over the past years:

- 2014: The City hosted three Homelessness Focus Groups (Community Leaders, Homeless Services Providers, and Consumers) in February 2014 to provide local input and perspectives on homelessness issues, impacts, and solutions. The outcome of the Focus Groups' efforts include a policy paper with a suggested strategy to end homelessness in Eureka.
- 2015: In collaboration with Humboldt County Department of Health and Human Services, the City implemented the "Mobile Intervention Services Team" (MIST) to focus on more effectively reducing homelessness and to conduct outreach to unsheltered homeless people in Eureka.
- 2016: Palco Marsh. The City undertook the challenging task of removing hundreds of homeless individuals that were illegally camping in a habitat restoration area. Substantial efforts were made to provide services and housing assistance including the creation of short-term shipping container housing and temporary sleeping areas
- 2016: A coordinated County/City effort created a County-wide "Housing First Summit," launched a "Housing 30 Homeless People in 60 Days Campaign," housing 70 people in 60 days, as well as hiring a Homeless Program Manager in 2017.
- 2017: The City partnered with Humboldt County to co-adopt a "Housing First" strategy. This was the City's first homelessness strategic plan. The City also partnered with Waterfront Recovery

Services to focus on providing drug treatment services for people experiencing homelessness.

- 2019: The City updated its zoning code, which included simplifying the development regulations for low-barrier-to-entry housing types such as single room occupancy (SRO), added incentives to construct affordable-by-design housing (<500 square feet), and contained other provisions designed to encourage the creation of housing. The City also established Uplift Eureka, a City-run mentorship program that helps people experiencing homelessness obtain housing and employment.

Looking forward over the 2019 to 2027 planning horizon, the City needs a homelessness strategic plan for the next eight years. This program consists of three on-going actions:

- Action One: The City Manager will create a taskforce of City staff, stakeholders, and/or City Councilmembers to evaluate the City's existing strategies regarding homelessness, conduct a comprehensive review of the current best practices from other California communities, evaluate the potential of hiring a specialized consultant, and then develop a report of findings.
- Action Two: Provide these findings to the Housing Advisory Board, Planning Commission, and City Council. City Council will direct staff.
- Action Three: The City will produce and adopt a new homelessness strategy that prioritizes resources for homelessness.

Implements Policies: H-1.16, H-2.2, H-2.16, H-2.17, H-2.18, H-2.19, H-2.22, H-3.1, H-3.3, H-7.1, H-7.2H-7.5

Timeframe: 2021-2022 (All actions completed within this time frame)

Responsible Parties: Development Services, City Manager, and other City departments identified during the planning process.

Funding: Departmental budget

IMP H-28: Advocate for Balanced Distribution of Resources County-wide

As the county-seat and the largest city in the region, many of the area's homelessness-related resources and programs are concentrated in Eureka. While this is sensible and beneficial to some degree, an over-concentration of resources/programs in Eureka can be detrimental to Eureka, to the region, and to the overall effort to eliminate homelessness. The City will work with the various branches of the Humboldt County government, as well as the six other incorporated cities in the County, to advocate for a balanced distribution of low income and homelessness resources and projects throughout the County and discourage resources, projects, and solutions to be over-concentrated in Eureka. This program consists of two on-going actions:

- Action One: As needed, advocate for the Humboldt County government to develop a coordinated county-wide strategic approach to implementing a geographically-balanced distribution of low-income and homelessness resources, projects, programs, and solutions throughout the County.
- Action Two: The Eureka City Manager will periodically meet with the City Managers of the other incorporated cities in the County to share information, to explore opportunities for collaboration, and to advocate for a geographically balanced distribution of low income and homeless

Implements Policies: H-2.2, H-6.1, H-6.2, H-6.3, H-6.4, H-7.3, H-7.5
Timeframe: 2020-2027 (Action 1 to occur opportunistically as county-led planning projects take place; Action 2 to occur in even-numbered years)
Responsible Parties: City Manager
Funding: Departmental budget

IMP H-29: Support Rental Subsidy and Rental Assistance Programs

Through the Housing Authority of Humboldt County, households in the City of Eureka are able to access Housing Choice Vouchers (formerly known as Section 8). The program provides rent subsidies to very low-income households. Prospective renters secure housing from HUD-registered landlords that accept the certificates. HUD then pays the landlords the difference between what the tenant can afford (30 percent of their income) and the payment standard negotiated for the community. The City regularly refers and provides general qualification and program information to interested individuals. While the City is not directly responsible for the administration of this program, Staff can direct residents to the Housing Authority and provide information on the program. This program consists of two on-going actions:

- Action One: Continue to provide general qualification assistance and refer applicants to the Housing Authority of Humboldt County.
- Action Two: Continue to encourage local property owners to accept rental vouchers.
- Action Three: Support the County in acquiring other State/Federal rental subsidy and rental assistance programs as they become available.

Implements Policies: H-2.18, H-2.19, H-5.7, H-6.1, H-6.2, H-6.3, H-6.4
Timeframe: 2019-2027
Responsible Parties: Development Services
Funding: Departmental budget

IMP H-30: Fair Housing Information and Referrals for Tenant/Landlord Mediation

The City will continue to provide residents with fair housing services information provided by the State Fair Employment and Housing Commission. The City will also provide referrals to County/State agencies that can provide counseling and mediation between tenants and property owners, seminars, and informational activities. The City will continue to refer fair housing complaints to the appropriate agencies/entities including the US Department of Housing and Community Development (HUD), State Department of Fair Employment and Housing and the City's Tenant Grievance Hearing Procedure. The City will also assist in program outreach through placement of fair housing handouts at the public counter, City library, post office, and other community locations. The City will also publish the Fair Housing Public Notice in the newspaper twice a year.

Implements Policies: H-4.6, H-6.1, H-6.2, H-6.3, H-6.4
Timeframe: 2019-2027
Responsible Parties: Development Services
Funding: Departmental budget

IMP H-31: English-Spanish Bilingual Housing Materials

Approximately six percent of households in Eureka reported speaking Spanish at home according to the 2010 Census. In order to ensure that all community members are able to access housing related information, including those that may have limited English language proficiency, the City will provide bilingual materials for key topics. This program calls for the City to create bilingual housing materials relating to often-discussed topics such as Accessory Dwelling Units and home-based businesses. The City will also explore the possibility of establishing and creating a City-wide Limited English Proficiency policy.

Implements Policies: H-6.1, H-6.2, H-6.3, H-6.4
Timeframe: 2021
Responsible Parties: Development Services
Funding: Departmental budget

IMP H-32: Support Repeal of Article 34 (Caps on Affordable Housing)

In 1950, Californians voted to amend the State Constitution to limit the amount of affordable housing that could be built in a community. It did this by allowing local communities to create a cap on the number of low-income housing units that could be built. It has come to be viewed by

many as a fundamentally racist, classist response to the construction of affordable housing. A growing number of communities across the State are advocating for the repeal of Article 34. This program sees the City take a formal stance on Article 34, calling for its repeal because it is fundamentally contrary to the community's goal of ample, safe housing for people of all backgrounds and incomes.

Implements Policies: H-5.7, H-6.1, H-6.2, H-6.3, H-6.4
Timeframe: 2020
Responsible Parties: Development Services
Funding: Departmental budget

IMP H-33: Verify Consistency with State Housing Laws

Housing-related legislation is regularly passed by the State Legislature. It is critical that the City maintain local development regulations consistent with this ever-charging body of state law. This program calls for consistency checks regarding specific topics, and generally requires an on-going effort to maintain consistency with new legislation as it may be created in the future.

- Action One: Verify consistency with law(s) pertaining to Emergency Shelters, specifically any buffers, and complete text amendment to remedy, if necessary.
- Action Two: Verify consistency with law(s) pertaining to Supportive Housing and Transitional Housing and complete text amendment to remedy, if necessary.
- Action Three: Verify consistency with law(s) pertaining to Navigation Centers and complete text amendment to remedy, if necessary.
- Action Four: Verify consistency with AB1397, a law relating to development on sites that have been identified in the parcel inventory in multiple Housing Elements and complete a text amendment to remedy, if necessary.
- Action Five: Verify consistency with all ADU and Junior ADU-related laws and complete a text amendment to remedy, if necessary.
- Action Six: Planning staff will stay educated on changing housing laws by reading trade magazines and by attending trainings and conferences on the topic.

Implements Policies: H-6.1, H-6.2, H-6.4
Timeframe: 2020 (Actions 1, 2, 3, 4, and 5) 2020-2027 (Action 6)
Responsible Parties: Development Services
Funding: Departmental budget

IMP H-34: Affordable Housing on Publicly-owned Properties

Publicly-owned parcels present an excellent opportunity to create affordable housing. They afford a local agency the greatest degree of control to guide development in a way that meets community housing needs. Typically, an agency will release a Request for Proposals (RFP) that in effect puts the property "up for sale/lease" to an affordable housing developer. The sale or lease is subject to conditions placed on the project. For example, a property could be sold on the condition that at least 20 units of affordable housing be built on the site. Staff conducted a detailed site inventory looking for parcels that might be suitable for this purpose. These sites are listed in Table 55 in the Technical Appendix.

There are a number of key housing objectives that the City intends to accomplish with this program:

Build 378 Units of Deed-Restricted Affordable Housing by 2028. The RFP will specify the minimum number and type of affordable units that must be included in the proposal.

Ensure Appropriate Unit Type (Number of Bedrooms). To make sure that the deed-restricted affordable housing units that are created under this program meet the needs of the various household sizes found in Eureka, the RFPs will establish required proportions. The following ratios are based on existing household sizes found in Eureka (See Table 5 in Technical Appendix). These ratios do not apply to market-rate units.

- Studio or 1-Bedroom Apartments: No more than 70 percent
- 2-Bedroom Apartments: At least 25 percent
- 3 to 5 Bedroom Apartments: At least 5 percent

Encourage Mixed-Income and Mixed-Use Developments. The RFP will prioritize projects that include a diversity of market housing units such as affordable-by-design studios, student housing, condominiums, and/or luxury penthouses. Mixed-use components such as corner stores, ground level or rooftop bars/restaurants, or child care facilities will also strengthen the application. The most strongly weighted scoring criterion will be the overall number of housing units.

Maximize Development Potential. The RFP will specify a minimum Floor Area Ratio (FAR) for each site to ensure that full development potential is realized. Proposals that meet the minimum number of units threshold but not minimum FAR will need to be augmented to be selected. Additional FAR can be achieved by adding additional affordable and/or market rate units or office/commercial floor area.

High Quality Design. As required by EMC Section 155.312, all developments associated with this program must comply with the objective design standards contained in the Eureka Zoning Code. These

regulations require that the development demonstrates an appropriate level of architectural detail with regard to façade/roof articulation and materials. Additionally, all projects will go before the Design Review Committee for further refinement prior to approval.

Active Transportation and Transit Focused/Reduce Green House Gas Emissions. Selected proposals will clearly show the ways in which residents will be encouraged and incentivized to use active/collective modes of transport such as walking, biking, transit, or car shares. Examples of this include convenient/secure bicycle parking, complimentary annual bus passes provided to each resident, or an on-site car share facility. Measures such as these will help the City meet greenhouse gas emission targets by providing the residents a realistic alternative to conventional motor vehicle usage.

The City recognizes that the success of this implementation program hinges more than anything on the ability to construct housing with little to no on-site parking spaces. Given the ample transit and nearby jobs/services, all of these proposed parking-less developments are likely to coexist harmoniously with the existing neighborhood. The specific parking exemptions/reductions are listed below and apply to all sites unless otherwise noted:

- **Deed-Restricted Affordable Units**: All deed-restricted affordable units are exempt from the requirement to provide on-site parking by EMC Section 155.324.020.B.3
- **Affordable-by-Design Units**: All market-rate residential units smaller than 500 square feet (i.e. affordable-by-design) are exempt from the requirement to provide on-site parking by EMC Section 155.324.020.B.2
- **Market Rate Units**: Market-rate units are required to provide on-site parking unless otherwise exempted by EMC Section 155.324.020.B or reduced via EMC Section 155.324.040.
- **Commercial Uses**: Commercial uses (e.g. offices, retail, restaurants, etc.) in the downtown area are not required to provide on-site parking per EMC Section 155.324.C.4.

The primary means of mitigating potential parking impacts will come via a parking management strategy in the downtown area, as called for in the General Plan and prescribed in the Eureka Parking Management Plan. The City received a $50,000 SB2 Planning Grant in October 2019 to complete the plan, which is estimated to be adopted by the end of 2020. This document will provide detailed analysis of existing parking facilities and needs, and contain actionable recommendations for how to make the most efficient use of existing facilities to meet the needs of downtown visitors, residents, and workers.

Shovel Ready Projects. The City will work to identify and mitigate potential regulatory barriers that may prevent or delay the development

of the sites as intended. Specifically, both CEQA and traffic will be analyzed prior to the release of the RFP and be disclosed therein.

- **CEQA:** The majority of the sites, especially the downtown parking lots, qualify for at least one of the following CEQA exemptions: Class 32 Urban Infill Exemption (CEQA Guidelines Section 15332), High Density Housing Near Transit (CEQA Guidelines Section 15195); and Affordable Housing Projects (CEQA Guidelines Section 15194).
- **Traffic:** City Engineering staff have conducted a preliminary evaluation of all proposed development sites (number of units and minimum FAR) and believe that most or all traffic/parking related impacts can likely be mitigated by active/public transportation focused measures. City Engineering will evaluate all specific development proposals prior to City approval.
- **Public Parking Maintenance (Sites 1-10):** For some sites the ground level public parking lot will need to be maintained, i.e. the development will need to contain a ground-level parking podium. For other sites, the ground-level public parking will not need to be maintained i.e. the ground level of the building may contain housing or commercial space. This determination will be made by City Council on a site-by-site basis prior to the release of the RFP.
- **Parking Assessment District.** For parking lots developed within the Parking Assessment District during the 1950s to 1960s, and on which public parking will be eliminated, the City will comply with California Streets and Highway Code. State statute provides a legal path forward for the developments proposed in this Implementation Program.
- **General Plan Consistency:** The 2040 Eureka General Environmental Impact Report (EIR) analyzed the impact up the creation of up to 1,886 additional housing units in the city. This is approximately double the 2019-2027 Regional Housing Needs Allocation (RHNA) of 952 units, and as such demonstrates that the potential environmental impacts related to this program are well within the analysis contained the adopted General Plan EIR.
- **Density Bonus Law:** The Density Bonus Law (found in California Government Code Sections 65915-55918) is a law that provides a housing developer incentives to build affordable housing. Typically, in exchange for building affordable units the developer is allowed to build more market rate units than they otherwise would. Additionally, they gain concessions and waivers that allow them relief from development standards such as parking requirements or building setbacks. Because all of the proposed developments qualify under the law, all allow the developer additional ways to overcome unexpected regulatory hurdles.

Site 1: City Parking Lot – Old City Hall (APN 001-094-002)

- **RFP Release**: January 1, 2020

- **Site Area**: 12, 724 square feet
- **Minimum Affordable Units**: 5 VLI and 5 LI
- **Minimum FAR**: 3.0 (38,172-square-foot building)

Site 2: City Parking Lot – Sunny & Myrtle (APN 006-181-001)
- **RFP Release**: January 1, 2020
- **Site Area**: 18,286 square feet
- **Minimum Affordable Units**: 15 VLI and 5 LI
- **Minimum FAR**: 2.0 (36,572-square-foot building)

Site 3: City Parking Lot – Eighth & G (APN 001-115-500)
- **RFP Release**: January 1, 2020
- **Site Area**: 14,668 square feet
- **Minimum Affordable Units**: 15 VLI and 5 LI
- **Minimum FAR**: 3.0 (44,004-square-foot building)

Site 4: City Parking Lot – 6th & M (APN 001-233-007 and 001-233-006)
- **RFP Release**: January 1, 2020
- **Site Area**: 13,200 square feet
- **Minimum Affordable Units**: 15 VLI and 5 LI
- **Minimum FAR**: 3.0 (39,900-square-foot building)

Site 5: City Hall Parking Lot – 5th Street (APN 001-192-001)
- **RFP Release**: January 1, 2022
- **Site Area**: 13,200 square feet
- **Minimum Affordable Units**: 15 VLI and 5 LI
- **Minimum FAR**: 3.0 (39,600-square-foot building)

Site 6: City Hall Parking Lot – 6th Street (APN 001-192-004)
- **RFP Release**: January 1, 2022
- **Site Area**: 13,200 square feet
- **Minimum Affordable Units**: 15 VLI and 5 LI
- **Minimum FAR**: 3.0 (39,600-square-foot building)

Site 7: City Parking Lot – 3rd & E (APN 001-096-003 and 001-096-002)
- **RFP Release**: January 1, 2021
- **Site Area**: 12,600 square feet
- **Minimum Affordable Units**: 10 VLI and 10 LI
- **Minimum FAR**: 3.0 (37,800-square-foot building)

Site 8: City Parking Lot – 5th and D (APN 001-103-003)
- **RFP Release**: January 1, 2021
- **Site Area**: 13,200 square feet
- **Minimum Affordable Units**: 10 VLI and 10 LI
- **Minimum FAR**: 3.0 (39,600-square-foot building)

Site 9: City Parking Lot – 4th and G (APN 001-142-007)
- **RFP Release**: January 1, 2021
- **Site Area**: 17,600 square feet
- **Minimum Affordable Units**: 15 VLI and 10 LI
- **Minimum FAR**: 3.0 (52,800-square-foot building)

Site 10: City Parking Lot – 5th and H (APN 001-142-005)
- **RFP Release**: January 1, 2022
- **Site Area**: 13,200 square feet
- **Minimum Affordable Units**: 15 VLI and 5 LI
- **Minimum FAR**: 3.0 (39,600-square-foot building)

Site 11: Portion of Cooper Gulch (APN 006-021-006)
- **RFP Release**: January 1, 2022
- **Site Area**: 19,792 square feet
- **Minimum Affordable Units**: 15 VLI and 5 LI
- **Minimum FAR**: No minimum
- **Additional Actions**: City will begin the process to rezone/upzone the site to accommodate the proposed development no later than June 1, 2021.

Site 12: Broadway and McCullen (DOT Surplus) (008-112-031)
- **RFP Release**: No applicable
- **Site Area**: 7,300 square feet
- **Minimum Affordable Units**: 7 VLI
- **Minimum FAR**: No minimum
- **Additional Action 1**: City will begin the process to rezone/upzone the site no later than June 1, 2020.
- **Additional Action 2**: City will contact the Department of General Services and Caltrans no later than June 1, 2020, to offer ongoing regulatory and/or financial assistance in the development of the site for Very Low Income Housing, potentially as a supportive housing facility for the formerly houseless.

Site 13: Sherriff's Woodlot (013-101-006 and 013-111-003)
- **RFP Release**: No applicable
- **Site Area**: 111,308 square feet (2.5 acres)
- **Minimum Affordable Units**: 40 VLI and 40 LI
- **Minimum FAR**: No minimum
- **Private Parking**: This site is large enough to provide a substantial number of on-site parking spaces to serve the residents.
    - Additional Action One: City will contact the County of Humboldt no later than June 1, 2022, to request that the site be developed as affordable housing.
    - Additional Action Two: City will provide ongoing regulatory and/or financial assistance to see this accomplished, including assistance in relocating the firewood production facility.

- Additional Action Three**:** City will begin the process to rezone/upzone the site no later than June 1, 2022, pending support from the County of Humboldt.

Implements Policies: H-2.19, H-6.1, H-6.2, H-6.3, H-6.4, H-7.2
Timeframe: 2020-2027
Responsible Parties: Development Services
Funding: Departmental budget

IMP H-35: Implementation Program Monitoring

On-going monitoring of Housing Element Implementation Programs is important to gauge the success of the programs. This program would call on staff to establish internal reporting procedures to record various housing creation related metrics. This data would be used to identify ways to make the programs more effective. If adequate progress toward housing creation is not made by 2023, Implementation Programs would be reviewed to identify opportunities for improvement.

- Action One: Planning staff will record housing creation inquiries (including those received at the counter, over the phone, or by email), pre-application meetings, project applications, building permits (date applied and date issued), and occupancy certificates. Affordability levels will be noted on all records.
- Action Two; Implementation Program review will be conducted at the planning cycle mid-point (2023) to evaluate effectiveness of Implementation Programs. Amendments to the Housing Element may be made based on the findings of the review, including rezoning pursuant to Government Code 65583.2.h-l to accommodate all remaining RHNA for lower-income households within five years of the beginning of the planning period.

Implements Policies: H-1.1, H-1.3, H-1.6, H-1.11, H-1.12
Timeframe: 2020-2027 (Actions 1 and 2) 2023 (Action 3)
Responsible Parties: Development Services
Funding: Departmental budget

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City of Eureka

2019-2027 Housing Element

Technical Appendix

Cover photo credit: Brian Heaton

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EUREKA HOUSING ELEMENT
TECHNICAL APPENDIX

Introduction

Document Organization

The Technical Appendix contains all of the demographic and housing related data that was used to create the Eureka Housing Element. It examines existing housing conditions and demographic trends to paint the clearest picture possible of the current state of housing in Eureka and predicts future housing needs over the 2019-2027 planning period. It also contains a review of the City's past accomplishments from the previous Housing Element (2014-2019). It is organized into the following sections:

- **Community Outreach**: Describes the City's outreach efforts to all residents of the community, including efforts to solicit input from households of lower and moderate incomes and groups with special housing needs.
- **Community Profile**: Assesses the demographic, household, and housing characteristics and trends to determine specific housing issues and needs in the community.
- **Housing Constraints**: Assesses the market, governmental, and environmental constraints to the development, improvement, and preservation of housing.
- **Housing Resources**: Compiles an inventory of land, financial, and administrative resources available to the City for the delivery of housing programs and services.
- **Review of Past Accomplishments**: Reviews the achievements of existing housing programs and determines their continued appropriateness for the 2014-2019 planning period.

Data Sources

Various data sources were used to compile the Technical Appendix:

- 1990, 2000, and 2010 Census
- City Building Permit and Planning Permit data
- Utility Data
- American Community Surveys (ACS)
- California Employment Development Department, Occupational Employment Statistics
- Humboldt Association of Realtors
- Northern California Association of Home Builders
- California Department of Developmental Services

Community Outreach

Public Outreach

The primary way that public feedback was gathered was at a large community housing workshop. The Eureka Housing Workshop took place on April 10, 2019 and was attended by over 200 community members. The event was an open house-style event with participants circulating between various stations to record their thoughts. Station topics included Accessory Dwelling Units (ADUs), affordable housing (both deed-restricted and by-design), tiny houses, vacation rentals, housing conditions and enforcement, housing insecurity, homelessness, and a light-hearted consumer preference survey in the form of mock real estate listings. The meeting was publicized in the following ways:

1. Radio
2. Social Media (Facebook and Instagram)
3. City Website
4. Printed Flyers

Data was collected via sticky notes, written ideas on posters, sticky dots ("voting" on certain ideas), and by notes taken by workshop facilitators. Additionally, a graphic recorder was on site to document community sentiment in pictorial form (see graphic at right). The summary of workshop results is including in this document.

The City conducted two joint study sessions with the Planning Commission and City Council in attendance. The first study session took place on October 1 and the second took place on October 23rd. The study sessions were publicized via a press release, by emailing the stakeholders listed in the next section, and by emailing the participants of the April 10, 2019 Housing Workshop.

Stakeholder Outreach

Stakeholder outreach for the 2019-27 Housing Element was conducted after the first draft of the Housing Plan and Technical Appendix were completed. The following organizations were sent copies and encouraged to both

provide their comments in writing. The following organizations were contacted.

1. Affordable Homeless Housing Alternatives (AHHA)
2. Westside Community Improvement Association
3. True North Organizing Network
4. County of Humboldt - Department of Health and Human Services (DHHS)
5. Humboldt State University – Off-Campus Housing Liaison
6. College of the Redwoods – Special Programs
7. Legal Services of Northern California
8. Eureka City Schools
9. Real Property Management
10. Humboldt Property Management
11. Tribal Governments
12. Danco
13. Housing Humboldt
14. Eureka Housing Authority
15. RCAA

Needs Assessment

Community Context

To analyze patterns and trends in Eureka, it is useful to divide the City into smaller geographical subareas. The City is comprised of seven census tracts, described here by unofficial neighborhoods. It is important to note that Census Tract boundaries do not exactly follow the Eureka City limit boundary; therefore, portions of the populations shown below may exist outside of the City. The following information is based primarily on Census 2010 and ACS 2012-2016 data. Unfortunately, more recent data was not available during the drafting period of this document. The age of the data should be kept in mind when reviewing this report.

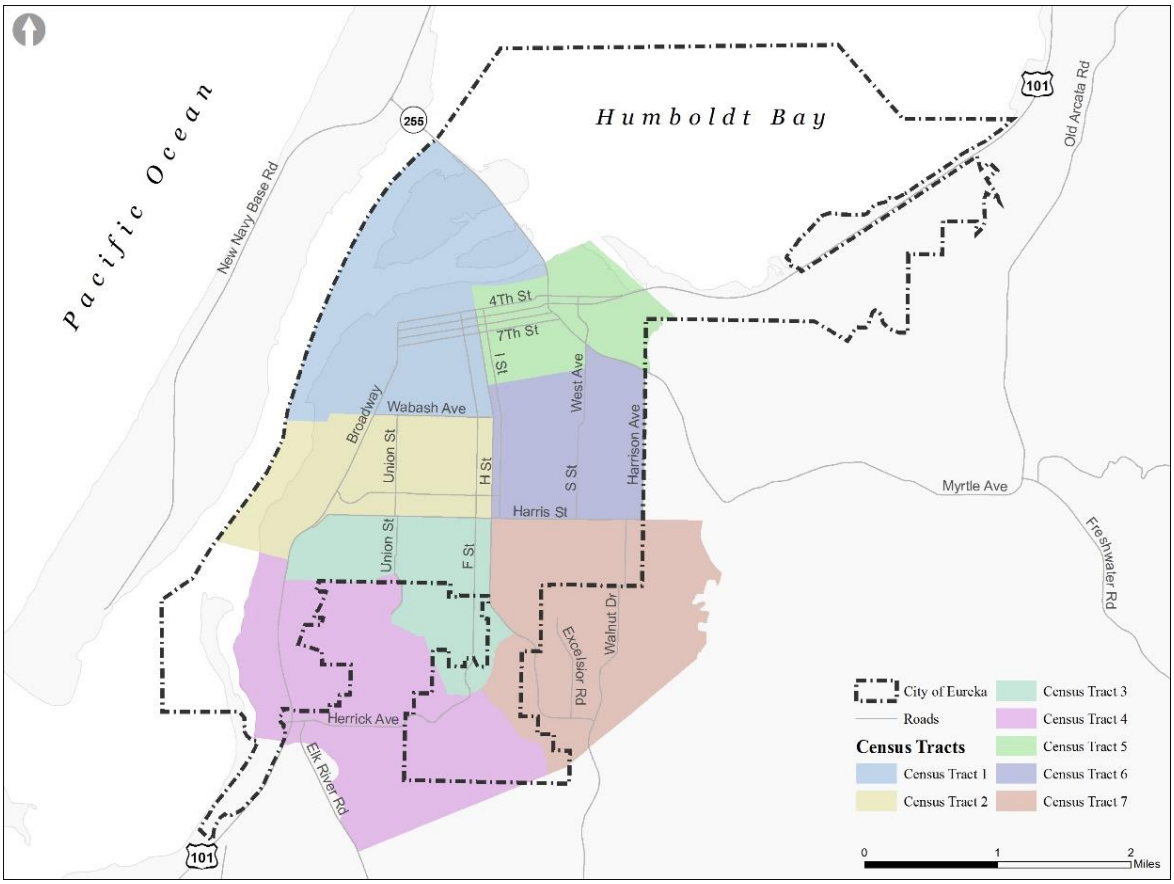
- **Census Tract 1:** This census tract has 4,901 residents and is located in the northwest portion of Eureka, extending south from Highway 255 to Wabash Avenue. This tract also covers Indian Island, Woodley Island, and portions of Old Town Eureka.
- **Census Tract 2:** This census tract has 6,211 residents and extends east from Humboldt Bay to H Street, and south from Wabash Avenue to Harris Street. West of Broadway is the Eureka Marsh and the Bayshore Mall. East of Broadway is primarily low and medium-density residential.
- **Census Tract 3:** This census tract has 5,544 residents and extends south from Harris to Census Tract 4. Tract 3 is primarily low density residential parcels and a small amount of public land consisting of parks and schools.
- **Census Tract 4:** This census tract has 3,873 residents and extends east from Humboldt Bay to Cutten. Within the southeast extension of the city this tract consists primarily of low density residential and of large public parcels with the Eureka Golf Course. The western portion of Tract 4 consists of a mixture of commercial and public parcels in the north, and natural resources and agriculture toward the south.

- **Census Tract 5:** This census tract has 4,263 residents and extends south from Humboldt Bay to Henderson Street. North of Myrtle Avenue and 7th Street are primarily commercial uses; the southern portion contains mostly residential and public uses.
- **Census Tract 6:** This census tract has 4,866 residents and extends east from H Street to Harrison Avenue, and consists primarily of residential and medical uses.
- **Census Tract 7:** This census tract has 5,360 residents and is located in the southeast portion of Eureka, extending south from Harris Street. Apart from Sequoia Park in the northern section of Tract 7, it contains primarily low density residential parcels.

Population Characteristics with Trends

Demographic characteristics of a community have direct impact upon housing needs. Characteristics such as race and ethnicity, population age structure, as well as income, determine the type of housing needed and ability to afford housing. This section briefly outlines the major population characteristics in Eureka.

Figure 1 Census Tract Boundaries



Population Growth

The City of Eureka is a relatively large jurisdiction, encompassing approximately 14.45 square miles, located centrally along the coast in Humboldt County. According to the U.S. Census, in 1990 the population of Eureka was approximately 27,025 residents. Over the last two decades the City's population has remained relatively stable, experiencing a slight dip in population in the year 2000 to 26,128 residents, followed by a comparable increase to 27,191 residents by 2010. In the last couple of decades, the City experienced a slight decrease (-0.1 percent) in population, which may be related to the limited land available for development, limited employment opportunities, and high real estate prices.

As mentioned previously, since 1990, the City's population has minimally fluctuated, experiencing an overall decrease of approximately -0.1 percent, from 1990 to 2016. **Table 1** indicates population growth trends for Eureka and surrounding communities. Eureka is well below the overall growth trend of Humboldt County and surrounding cities, which have seen an increase of greater than 13 percent since 1990.

Table 1 Population Trends – Eureka and the Region

	1990	2000	2010	2016	% Change 1990-2016
Arcata	15,197	16,651	17,231	17,775	17.0%
Eureka	27,025	26,128	27,191	27,002	-0.1%
Fortuna	8,788	10,497	11,926	11,917	35.6%
Humboldt County	119,118	126,518	134,623	135,182	13.5%

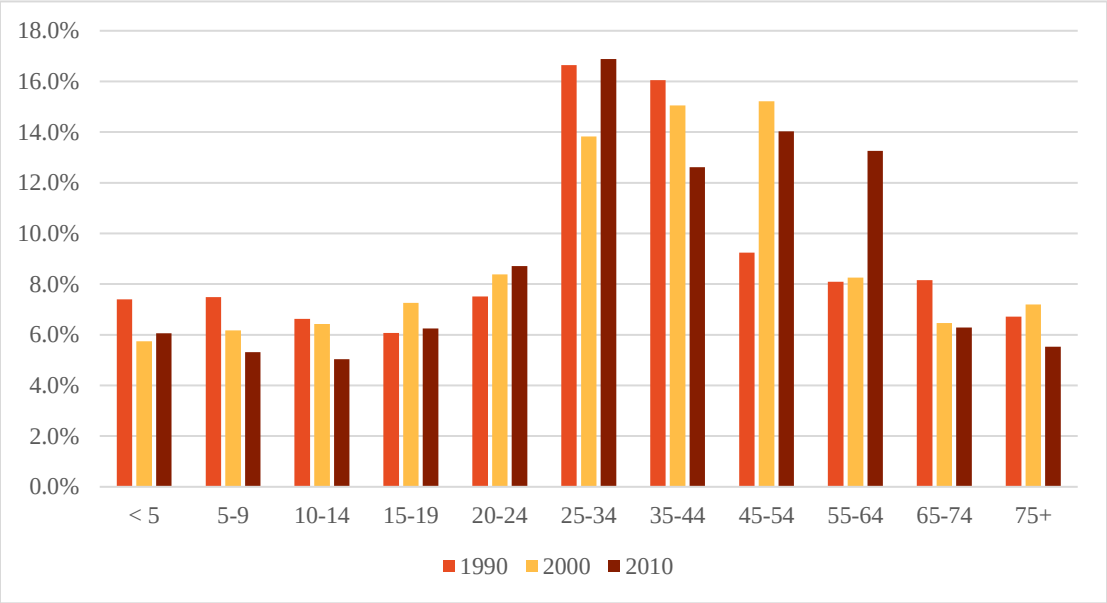
Sources: Bureau of the Census, 1990, 2000, and 2010 Census, 2012-16 ACS 5-year estimates.

Population Age Structure

Housing need in a community is largely determined by population age structure and the life cycle of households, because people require different types of housing at different stages in their life. For example, while younger single adults (20-34) prefer smaller rentals, partners and families (35-65) may prefer larger dwellings and those with children may desire homes with an open space. However, as children leave home, seniors may begin to trade in their larger dwellings for smaller and more accessible homes.

Figure 2 shows that the largest age group in Eureka in 2010 was adults between the ages of 25 and 34 (at 17 percent). The second largest group, adults between 45 and 54 years old, made up 14 percent of the population. Adults between 35 and 44 years old typically comprise the majority of a community's families with children. The proportion and number of this group has declined most significantly compared to other age groups. Correspondingly, the number and proportion of children between five and 15 and seniors over 75 also declined in the City since 1990.

Figure 2 Age Distribution – Eureka



Source: Bureau of the Census, 1990, 2000, and 2010 Census.

The age distribution in the City remained mostly stable throughout the previous few decades. However, according to the 2010 Census, adult populations between 44 and 65 increased most substantially since 1990, while ages 35-44 were the largest decrease. The overall pattern has seen a slight decrease in children and seniors, while middle aged populations have grown.

Race and Ethnicity

Race and ethnicity of residents in a community can affect their housing needs and preferences. Different people may have different household characteristics, such as family structure or linguistic ability, which affect their housing needs and/or their ability to earn sufficient income to afford suitable housing. This section details the diversity of Eureka's residents and its impact on housing needs.

According to the 2010 Census, Eureka had a slightly smaller proportion of White residents compared to other cities and Humboldt County, and has been decreasing across the county since 2000. In 2016, Whites comprised the majority of the population (78 percent) in Eureka, followed by Asians at 6 percent, and Blacks (2 percent). The ethnic and racial mix in the City has changed only marginally since 2000, with the largest change in the Hispanic population that has increased from 8 percent to almost 12 percent since 2000 (**Table 2**). The Asian population has increase by around 1 percent every 10 years since the 2000 Census. Overall, the City's racial and ethnic distribution was similar to that of the County, albeit Eureka had a slightly higher share of Black and Asian populations, and a slightly lower proportion of American Indians.

Table 2 Race and Ethnicity – Eureka and the Region

	2000				
	% White	% Black	% Asian	% American Indian	% Hispanic*
Arcata	84.5%	1.6%	2.3%	2.7%	7.2%
Eureka	82.5%	1.6%	3.6%	4.2%	7.8%
Fortuna	88.4%	0.4%	1.0%	2.9%	10.5%
Humboldt County	84.7%	0.9%	1.7%	5.7%	6.5%
	2010				
	% White	% Black	% Asian	% American Indian	% Hispanic*
Arcata	81.8%	2.0%	2.6%	2.3%	11.6%
Eureka	79.3%	1.9%	4.2%	3.7%	11.6%
Fortuna	81.2%	0.6%	0.9%	3.7%	17.0%
Humboldt County	81.7%	1.1%	2.2%	5.7%	9.8%
	2016				
	% White	% Black	% Asian	% American Indian	% Hispanic*
Arcata	80.0%	2.5%	2.1%	2.1%	16.8%
Eureka	77.8%	1.8%	5.9%	2.8%	10.2%
Fortuna	82.9%	0.3%	1.3%	2.9%	18.9%
Humboldt County	81.2%	1.1%	2.7%	5.0%	10.7%

*Hispanic or Latino refers to a person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin regardless of race.
Sources: Bureau of the Census, 2000, 2010 Census, ACS 2012-2016.

Foreign-Born Population

Although Eureka's population is relatively homogenous with respect to race and ethnicity, a small share of the population is comprised of foreign-born persons and recent immigrants. According to the 2012-2016 American Community Survey (ACS), about 7 percent were foreign-born, with representation from well over 30 other countries (**Table 3**). Regardless of the City's relatively small foreign-born population, it is still an important factor affecting housing needs, especially with respect to linguistic isolation.

Of the immigrant population in Eureka, the most significant are Asian and Latin American populations. In 2000, Latin Americans accounted for almost 40 percent of the foreign-born population and just over 2 percent of the total population in Eureka. Asian immigrants made up 34 percent of the foreign-born population and approximately 2 percent of the total City population. The 2000 Census found that the third largest group of foreign-born residents were from Europe, comprising 19 percent of the foreign-born population. Foreign born persons continue to make up a small yet important portion of the City's population.

Table 3 Place of Birth of Immigrants – Eureka and Humboldt County

Place of Birth	Number Eureka	% of Foreign Born Population (Eureka)	% of Total Population	Number Humboldt	% of Foreign Born Population (Humboldt)
Europe	266	14.9%	1.0%	1,092	15.2%
Asia	810	45.3%	3.0%	1,977	27.5%
Latin America	653	36.5%	2.4%	3,458	48.1%
Northern America	59	3.3%	0.2%	443	6.2%
Africa	0	0.0%	0.0%	79	1.1%
Oceania	0	0.0%	0.0%	147	2.0%
Total Foreign Born	1,788	100.0%	6.6%	7,196	100.0%
City Population	27,002	--	--	--	--
% Foreign Born	6.6%	--	--	--	5.3%

Source: American Community Survey, 2012-2016.

According to the 2012-2016 ACS, Asians were the largest immigration group, making up 45 percent of the City's foreign-born population and an estimated 3 percent of the total population in Eureka. Foreign born residents from Southeast Asia have been a stable population in the City over the last two decades. This population, which speaks various languages, is aging in place. Their consistent presence in Eureka contributes to the need for housing in the community that meets the needs of an older, frailer population with linguistic concerns.

Compared to Humboldt County, Eureka has a significantly higher concentration of foreign born residents from Asia (18 percent) and lower concentrations of Latin and Northern American foreign-born residents. Proportions of immigrants from Europe, Africa, and Oceania were comparable between Eureka and Humboldt County.

Linguistic ability influences a person's ability to secure employment and housing. Linguistic isolation can prevent immigrants from accessing social services, health care, and public assistance. A person who struggles to communicate in English will likely depend on personal connections within their ethnic or cultural enclave to acquire housing which may ultimately limit their housing opportunities.

According to the 2012-2016 ACS, 13 percent of all persons age five and over in Eureka spoke a language other than English at home. As shown in **Table 4**, the most prevalent foreign languages spoken were Spanish (45 percent), Other Pacific Island (25 percent), and Other Indo-European (9 percent). The proportion of Eureka residents who spoke a language other than English at home has increased slightly since 2000. However, because the language categories differed so greatly between the 2000 Census and the 2012- 2016 ACS, it is difficult to ascertain whether there were any significant changes in the prevalence of certain languages.

Table 4 Non-English Language Spoken at Home – Eureka

	2000			2016		
Language Spoken at Home	Persons	Percent	% of Total Population	Persons	Percent	% of Total Population
Spanish or Spanish Creole	1,155	50.3	4.4	1,491	44.9	5.9
French (incl. Patois, Cajun)	95	4.1	0.4	46	1.4	0.2
Italian	52	2.3	0.2	--	--	--
Portuguese	55	2.4	0.2	--	--	--
German	134	5.8	0.5	200	6.0	0.8
Scandinavian languages	30	1.3	0.1	--	--	--
Russian, Polish, or Other Slavic languages	31	1.3	0.1	47	1.4	0.2
Armenian	6	0.3	0.0	--	--	--
Guajarati	58	2.5	0.2	--	--	--
Hindi	16	0.7	0.1	--	--	--
Other Indo-European	29	1.3	0.1	288	8.7	1.1
Chinese	7	0.3	0.0	188	5.7	0.7
Japanese	48	2.1	0.2	--	--	--
Korean	10	0.4	0.0	24	0.7	0.1
Miao, Hmong	343	14.9	1.3	--	--	--
Thai	39	1.7	0.1	--	--	--
Laotian	57	2.5	0.2	--	--	--
Vietnamese	7	0.3	0.0	5	0.2	0.0
Tagalog	6	0.3	0.0	156	4.7	0.6
Other Pacific Island	30	1.3	0.1	816	24.6	3.2
Other Native North American languages	47	2.0	0.2	--	--	--
African languages	6	0.3	0.0	--	--	--
Other and unspecified languages	36	1.6	0.1	59	1.8	0.2
Total	2,297	100.0	8.8	3,320	100.0	13.0
Total Population	26,128	--	--	25,459	--	--
% Not English	--	8.8	--	--	13.0	--

Note: ACS language categories differ from the 2000 Census and not all languages from 2000 are included in the 2012-2016 ACS.
Source: Bureau of the Census, 2000; American Community Survey, 2012-2016.

Household Characteristics w/ Trends

Household Type

Table 5 shows the makeup of households in Eureka between 2000 and 2016. Some changes in household type were fairly minor between 2000 and 2010, however, some were quite large with the largest changes occurring in the categories of other non-families (22.2 percent), and families with children (-10.8 percent). Changes in the age of householders were also visible. A slight increase (8 percent) in the proportion of householders' ages 35 to 64 years can be seen between 2000-2010, while the largest shift can be seen in seniors ages 65 and older (12 percent).

Table 5 Household Characteristics – Eureka

	2000		2010		2016		Percent Change	
Household	# of Families/ HH	Percent	# of Families/ HH	Percent	# of Families/ HH	Percent	2000-2010	2010-2016
Household Type								
Families with Children	2,825	25.8%	2,519	22.6%	2,396	21.9%	-10.8%	-4.9%
Families without Children	3,061	27.9%	3,194	28.6%	3,333	30.4%	4.3%	4.4%
Non-Family Single	3,871	35.3%	3,971	35.6%	3,972	36.2%	2.6%	0.0%
Non-Family Other	1,200	11.0%	1,466	13.1%	1,261	11.5%	22.2%	-14.0%
Householder Age								
Under 35	2,889	26.4%	2,983	26.8%	2,620	23.9%	3.3%	-12.2%
35 to 64 years	5,470	50.0%	5,891	52.8%	5,652	51.6%	7.7%	-4.1%
65+	2,583	23.6%	2,276	20.4%	2,690	24.5%	-11.9%	18.2%
Household Size								
1 person	3,871	35.3%	3,971	35.6%	3,974	36.3%	2.6%	0.1%
2 person	3,667	33.5%	3,720	33.4%	3,723	34.0%	1.4%	0.1%
3 to 4 person	2,614	23.9%	2,594	23.3%	2,580	23.5%	-0.8%	-0.5%
5+	805	7.3%	865	7.8%	685	6.2%	7.5%	-20.8%

Source: Bureau of the Census, 1990, 2000, and 2010 Census, 2012-2016 ACS.

Between 2010 and 2016, other non-family households had the largest change in household type with a decrease of 14 percent. Proportion of senior households (age 65 and above) had a significant increase in 2016 (18 percent), while under 35 and 35 to 64 households had a combined decrease of over 16 percent. Most household sizes remained unchanged, except those with five people and over with a significant decrease of over 20 percent. Since senior households tend to be smaller in household size, this increase is consistent with the drop in large household sizes.

The majority of households in Eureka are one-person non-family single households. These households made up over 36 percent of all households in the City in 2016, consistent with both 2000, and 2010. Family households made up over 50 percent of total households and other households represented about 12 percent of the total.

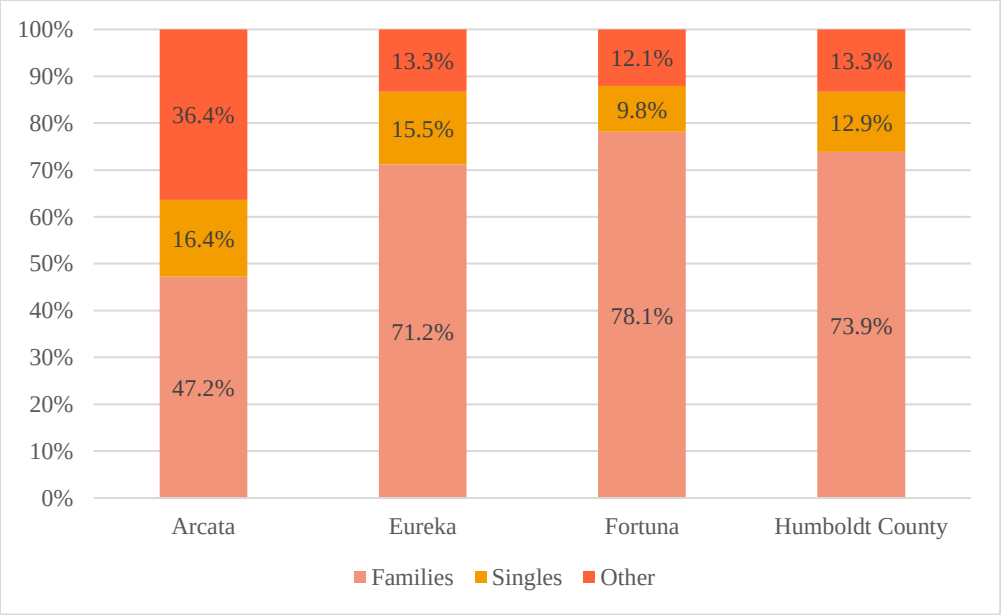
Population in Households

Population distribution by household type has remained quite static since 2000. Population within families, the largest group, has remained around 70 percent. Single households have held the second highest population household type between 2000 and 2016, staying around 15 percent. Resident populations in non-family (other) households have decreased slightly since 2000 (1.5 percent). Consistent with the household type population, average household size has remained constant since 2000, staying around 2.3 percent.

Other than Arcata, which has a large student population attributable to Humboldt State University, most of the region has a household type population distribution similar to Eureka (**Figure 3**). The Census shows that family households dominate the region with over 70 percent of residents living in a household of that type.

Generally, average household size increases when the proportion of family households in a community increases. Therefore, it should come as no surprise that Eureka had a slight increase of average household size as the family households trended higher.

Figure 3 Population by Household Type – Eureka and the Region



Household Size

Household size is an important indicator of a source of population growth. A City's average household size is also an indicator of the character and size of households, which represents the most basic unit of demand for housing. Although there can be more than one household in a housing unit, which is a trend that is increasing regionally, the measure of persons per household provides not only an indication of the number of persons residing in a household organizing unit, but the number of persons living in a housing unit. Average household size can be both a result and indicator of housing affordability and other household economic conditions.

As indicated in **Table 6**, the average household size in Eureka in 2010 was around 2.3, which has grown slightly since 2000. This indicates that family households have increased at a higher rate than single occupancy households over the years. The County of Humboldt had a slightly higher average than Eureka at 2.44 persons per household according to the 2012-2016 ACS. **Table 7**, below provides specific information about household size in the City of Eureka by tenure.

Table 6 Population in Households – Eureka

	2000		2010		2016	
Household Type	**Number[a]**	**Percent**	**Number[a]**	**Percent**	**Number[a]**	**Percent**
Families	17,243	69.6%	17,835	70.5%	18,328	71.2%
Singles	3,871	15.6%	3,971	15.7%	3,979	15.5%
Other Households[b]	3,659	14.8%	3,502	13.8%	3,417	13.3%
Total Population in Households	**24,773**	**100%**	**25,308**	**100%**	**25,724**	**100%**
Average Household Size	*2.26*		*2.27*		*2.35*	

[a] Number represents population in each household type.
[b] "Other" Households are non-family households made up of more than one person. The Census defines "family" as two or more people who reside together and who are related by birth, marriage or adoption.
Sources: Bureau of the Census, 2000, and 2010 Census; 2012-2016 ACS.

Table 7 Household Size by Tenure – Eureka

Household Size	Total Households	Percent of Total	Renter	Percent of Total	Owner	Percent of Total
1 Person	3,974	36.3%	2,400	21.9%	1,574	14.4%
2 Persons	3,723	34.0%	1,759	16.0%	1,964	17.9%
3-4 Persons	2,580	23.5%	1,338	12.2%	1,242	11.3%
5+ Persons	685	6.2%	455	4.2%	230	2.1%
Total	**10,962**	**100%**	**5,952**	**54.3%**	**5,010**	**45.7%**

Source: Bureau of the Census, 2012-2016 ACS 5-Year Estimates.

As shown in Table 7, the majority of households in Eureka are one and two-person households, with the next largest percentage of households containing 3 to 4 people. According to the 2012-2016 ACS there are only 685 households with five or more persons, representing approximately 6 percent of all households. This is significantly lower than 1- and 2-person households, indicating a strong need for studio and one bedroom apartments.

Overcrowding

The federal government defines an overcrowded household as one with more than one occupant per room, excluding bathrooms, kitchens, hallways, and porches. An overcrowded household results from either a lack of affordable housing (which forces more than one household to live together) and/or a lack of available housing units of adequate size. A household is considered to be overcrowded if there are more than 1.01 occupants per room. A household is considered to be severely overcrowded if there are more than 1.51 occupants per room.

According to the 2012-2016 ACS, 201 households, or approximately two percent of all households in Eureka were overcrowded. Of this total, approximately 27 were renter households, representing 13 percent of all overcrowded households and less than one percent of all renter households. In comparison, an estimated 174 owner-occupied units were classified as overcrowded, representing roughly 86 percent of all overcrowded households and around two percent of all owner-occupied units.

As shown in **Table 8**, the 2012-2016 ACS also reports that approximately 160 households, or roughly 1.5 percent of all households in Eureka, are considered to be severely overcrowded. Generally, the number of owner-occupied units that were severely overcrowded (2.2 percent) was higher than the number of renter-occupied units considered to be severely overcrowded (0.8 percent). The incidence of overcrowded and severely overcrowded households is generally low in the City. In Humboldt County, approximately 2.4 percent of households were overcrowded and 1.4 percent of households were severely overcrowded, slightly more overall than in the City of Eureka.

Table 8 Overcrowding by Tenure – Eureka

Tenure	Total Occupied Housing Units	Overcrowded Households	Percentage	Severely Overcrowded Households	Percentage
Renters	5,952	27	0.5%	49	0.8%
Owners	5,010	174	3.5%	111	2.2%
Total	10,962	201	1.8%	160	1.5%

Source: Bureau of the Census, 2012-2016 ACS 5-Year Estimates.

Employment and Income Characteristics

Employment Profile

Employment characteristics also affect housing needs of residents within Eureka. Different occupations often translate into different wage levels -- therefore affecting the ability to afford certain types of housing. **Table 9** presents the 2012-2016 ACS data on occupations by industry and the California Employment Development Department occupational wage scale. The largest occupation groups in Eureka from 2012 to

2016 were management/professional and sales/office jobs at approximately 28 percent each, with the service industry close at 25 percent. The City of Fortuna was evenly divided similar to Eureka; however, Arcata and Humboldt County had a higher proportion in the management/professional industry at 38 percent and 34 percent, respectively.

Table 9 Employment Profile – Eureka and the Region

Occupation	Eureka #	Eureka %	Arcata	Fortuna	Humboldt County	Mean Wage 2016
Management/Professional	3,428	27.9%	37.5%	28.2%	33.6%	$83,700
Service	3,097	25.2%	25.9%	25.1%	23.4%	$26,003
Sales/Office	3,465	28.2%	25.4%	26.5%	23.8%	$30,063
Natural Resources, Construction, Maintenance	1,107	9.0%	5.9%	8.2%	10.1%	$52,995
Production, Transportation, Material Moving	1,180	9.6%	5.3%	12.1%	9.0%	$35,136
Total	**12,277**	**100%**	**100%**	**100%**	**100%**	**$43,291**

Sources: American Community Survey, 2012-2016 5-year estimates. California Employment Development Department, Occupational Employment Statistics, First Quarter 2016.

The mean for wages in 2016 for the Humboldt County North Coast Region show that management and professional occupations paid the highest with an annual wage of $83,700. Sales and office occupations, which employed the largest group of Eureka residents, had a mean wage of $30,063. The overall mean wage for the County was $43,291. **Table 10** shows that, compared to the County and City of Arcata, a smaller proportion of the employed residents in Eureka were engaged in higher paying management and professional occupations. With a large population in lower earning occupations, the City of Eureka has a need for housing stock that can accommodate a wide economic spectrum.

Table 10 Income Distribution – Eureka and the Region

Income Level	Arcata	Eureka	Fortuna	Humboldt County
Extremely Low Income (0-30% AMI)	25.1%	14.2%	11.9%	13.6%
Very Low Income (31-50% AMI)	17.4%	14.5%	13.2%	13.3%
Low Income (51-80% AMI)	16.9%	21.4%	20.8%	18.1%
Moderate and Above Moderate Income (over 80% AMI)	40.6%	50.0%	54.1%	55.0%

Source: U.S. Department of Housing and Urban Development, Comprehensive Housing Affordability Strategy (CHAS) Data, 2011-2015 CHAS.

Income Distribution

For purposes of housing planning and affordable housing funding, State housing laws have established the following income levels based on Area Median Income (AMI):

- Extremely Low Income: 0 to 30 percent AMI
- Very Low Income: 31 to 50 percent AMI

- Low Income: 51 to 80 percent AMI
- Moderate Income: 81 to 120 percent AMI
- Above Moderate Income: greater than 120 percent AMI

Combined, extremely low, very low, and low income households are considered lower income. The 2010 Census does not contain information on the number of households at each State income level. However, this data was tabulated by U.S. Department of Housing and Urban Development (HUD) using the 2011-2015 ACS. As shown in Table 10, between 2011 and 2015, approximately half of the City's households earned lower incomes, while the other half earned moderate or above moderate incomes.

Neighborhood Income Comparison

In analyzing the economic status of households in a community, it is important to identify neighborhoods where low-income households are disproportionately concentrated. This section discusses the economic status of the seven census tracts covering the City. The Humboldt County median is used as a reference point to compare median incomes throughout the City.

Eureka's north side had the lowest median income and some of the highest poverty rates in the City. In particular, Tracts 1 and 5 had the lowest median income in Eureka. The western tracts had the next lowest median income, but very close to the County's Median Household Income, (**Table 11**). The Eastern areas of the City (Tracts 6 & 7) had the lowest poverty rate and the highest median incomes in the City.

Table 11 Income by Neighborhood - Eureka

Income Category	Tract 1	Tract 2	Tract 3	Tract 4	Tract 5	Tract 6	Tract 7
Median Household Income	$26,291	$41,936	$42,983	$42,708	$28,175	$48,208	$57,857
% of County Household Median	62.3%	99.4%	101.9%	101.2%	66.8%	114.2%	137.1%
Median Family Income	$35,587	$52,993	$45,435	$46,538	$31,585	$58,685	$82,868
% of County Family Median	66.6%	99.2%	85.1%	87.1%	59.1%	109.9%	155.2%
Median Non-Family Income	$23,581	$26,225	$34,141	$32,917	$24,766	$33,186	$24,091
% County Non-Family Median	89.5%	99.6%	129.6%	125.0%	94.0%	126.0%	91.5%
Poverty Rate	33.4%	17.0%	33.5%	16.4%	29.3%	10.8%	12.4%

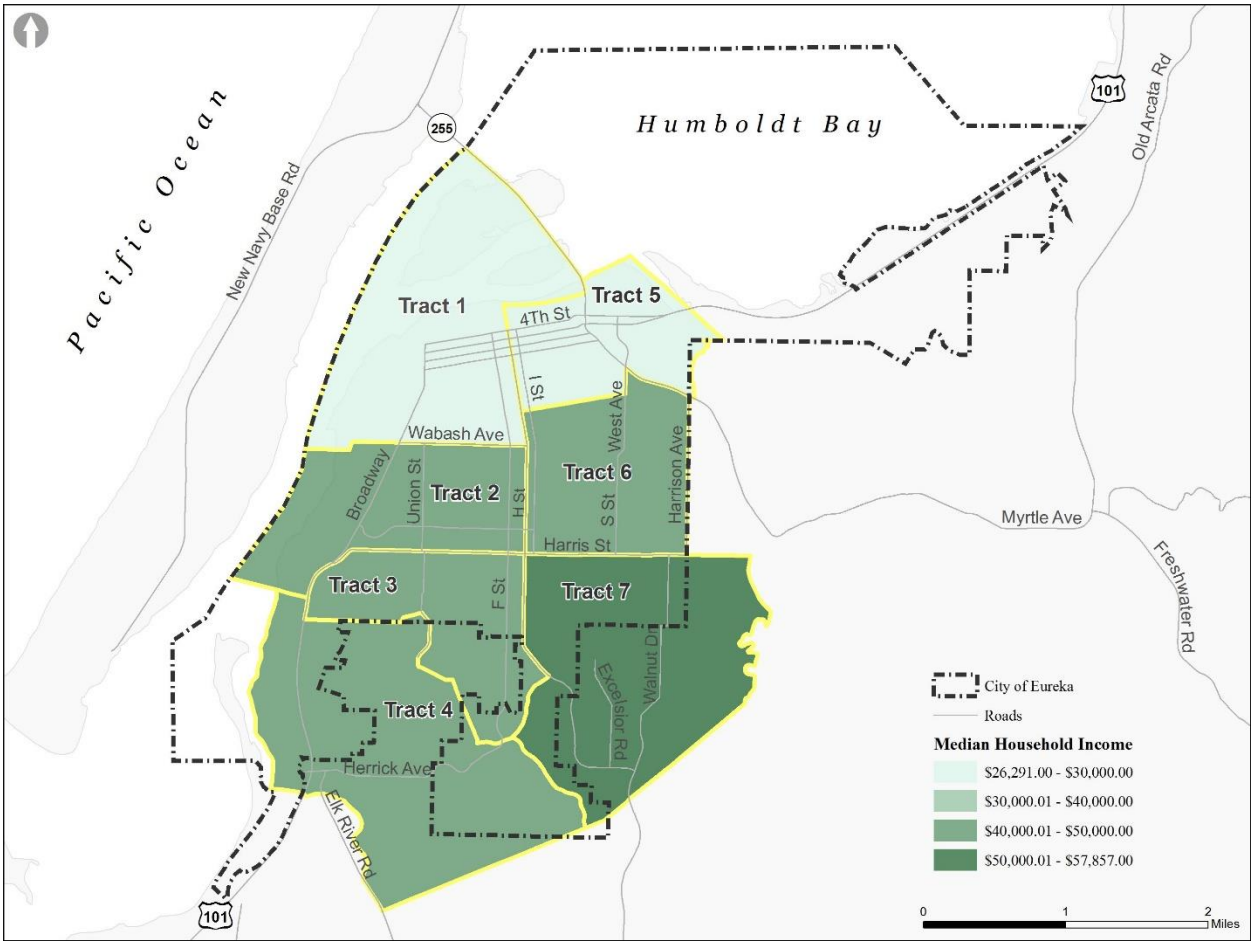
Source: American Community Survey, 2012-2016 5-year estimates.

Median Incomes

This section documents changes in the economic status of Eureka residents in comparison with the region. Household income, along with housing affordability and availability, are the metrics that allow for the clearest picture of the economic status of a population. Housing affordability and availability are examined elsewhere in this report. In general, median household income is the most commonly used data for income comparison. However, household income can be a limited measure because it fails to account for differences in household characteristics among communities. The comparison implicitly assumes that each community has similar composition of households. Since Eureka generally has a household composition similar to many communities in Humboldt County, the median household income was used. Median

household income in Eureka was lower than the County and nearby Fortuna for all years since 2000, but higher than the city of Arcata, which has a larger student population (**Figure 4**).

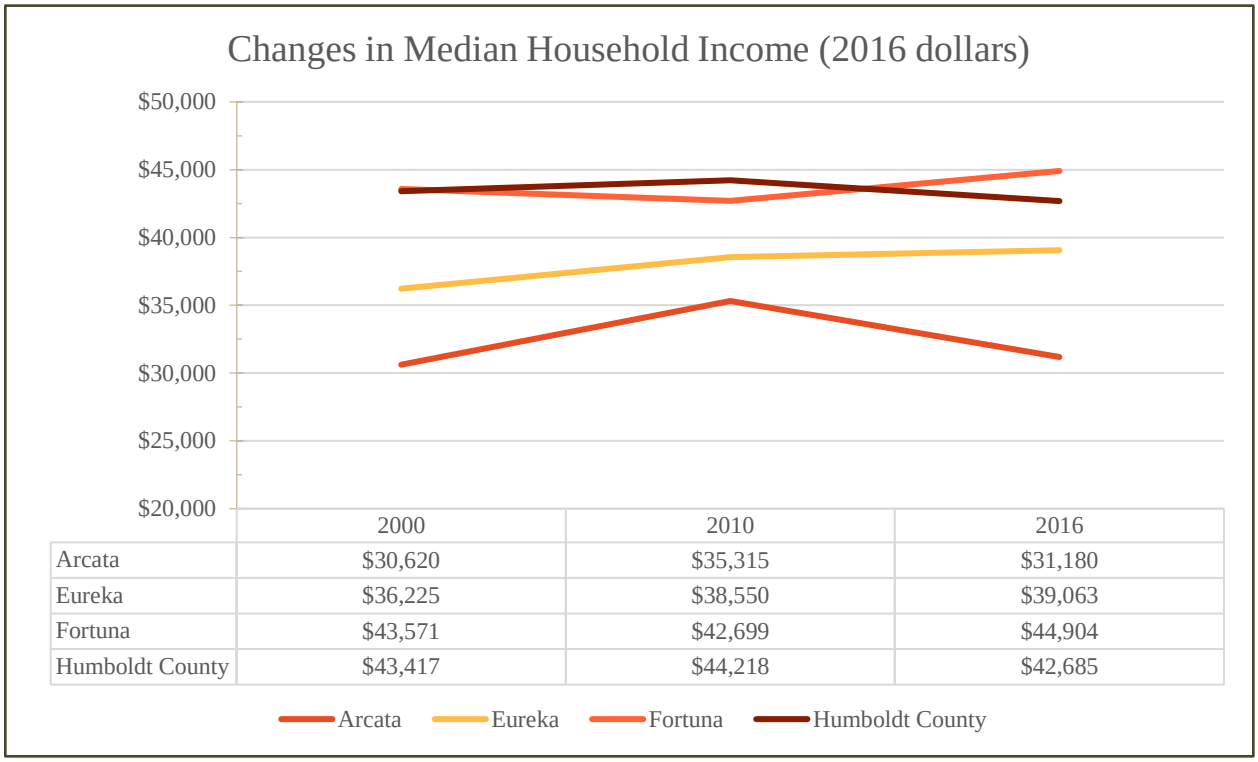
Figure 4 Median Household Income by Tract



Income Changes Over Time

An important question affecting housing policy is whether Eureka residents have improved their economic standing over time. Unfortunately, direct comparison is not possible because the Census does not show whether changes in household income are due to the influx/exit of residents or actual changes in the economic status of current residents. However, when comparing per capita and median household income in Eureka with regional figures, some general trends may be inferred. Specifically, between 2000 and 2010, many regional cities experienced steady increases in median household income, but remained at or below the County-wide level. From 2010 to 2016, Eureka's median household income trended slightly upward while Humboldt County dropped (1.3 percent and -3.5 percent, respectively) but remained just below the County median income (**Figure 5**).

Figure 5 Changes in Median Household Income



	2000	2010	2016
Arcata	$30,620	$35,315	$31,180
Eureka	$36,225	$38,550	$39,063
Fortuna	$43,571	$42,699	$44,904
Humboldt County	$43,417	$44,218	$42,685

Special Needs Groups

State law recognizes that certain households have more difficulty in finding adequate and affordable housing due to special circumstances. Consequently, certain Eureka residents may experience a higher prevalence of housing cost burden, overcrowding, or other housing problems. Special needs populations include the elderly, persons with disabilities, large households, female-headed households, and farm workers (**Table 12**). Each unique population group and their specific housing needs are described in the sections below.

Table 12 Special Needs Groups – Eureka

Special Needs Group	# of People or Households	Number of Owners	% Owner	Number of Renters	% Renter	% of Total Households or Population
Households with Seniors	3,003	--	--	--	--	27.4%
Senior Headed Households	2,690	1,896	70.5%	794	29.5%	24.5%
Seniors Living Alone	1,415	866	61.2%	549	38.8%	12.9%
Persons with Disabilities	5,181	--	--	--	--	19.5%
Large Households	685	230	33.6%	455	66.4%	6.2%

Special Needs Group	# of People or Households	Number of Owners	% Owner	Number of Renters	% Renter	% of Total Households or Population
Single-Parent Households	1,282	--	--	--	--	11.7%
Female Headed Households with Children	906	--	--	--	--	8.3%
People Living in Poverty	6,176	--	--	--	--	23.4%
Farmworkers	146	--	--	--	--	0.7%
Homeless	426	--	--	--	--	

Source: American Community Survey 2012-2016 5-Year Estimates, HHHC 2018.

Elderly Households

Many elderly individuals have special housing needs due to fixed incomes and limited mobility. Housing construction and location are important considerations for this population group. The elderly often require ramps, handrails, and lower cupboards and counters to allow greater access and mobility. They also may desire special security devices for their homes to allow greater self-protection.

To compensate for limited mobility, their housing should be located within easy walking distance of the services that meet their needs, such as medical or shopping facilities, or should be served by public transit.

The special needs of the elderly can be summarized in the following:

- Income – The elderly population typically lives on fixed incomes;
- Household Composition – Elderly women often live alone;
- Transportation – Elderly residents are more likely to utilize public transportation; and,
- Health Care – The elderly have a greater need for health care.

As shown in **Table 13**, an estimated 2,690 elderly householders reside in Eureka, which is approximately 25 percent of the City's total households. This is a slight increase from the 2,276 senior households reported by the 2010 Census. Of the total number of senior households reported in 2016, 794 were renters (13 percent) and 1,896 were owners (38 percent).

Table 13 Elderly Households by Tenure and Age – Eureka

	Owner-Occupied		Renter-Occupied	
Householder Age	Units	Percent	Units	Percent
Total Households	5,010	--	5,952	--
65-74 years	945	18.9%	531	8.9%
75 plus years	951	19.0%	263	4.4%
Total Elderly Households	1,896	37.8%	794	13.3%

Source: American Community Survey 2012-2016 5-Year Estimates.

Another factor to consider in the elderly population is the percent of elderly women living alone. According to the 2012-2016 ACS, approximately 13 percent of Eureka's elderly households live alone. Of this total, roughly six percent of elderly men live alone, while seven percent of elderly women live alone.

Persons with Disabilities

Physical and mental disabilities can hinder access to traditionally designed housing units as well as potentially limit the ability to earn adequate income. As shown in **Table 14**, the 2012-2016 ACS indicates that approximately 19 percent of Eureka's population has one or more disabilities. Although no current comparisons of disability with income, household size, or race/ethnicity are available, it is reasonable to assume that a substantial portion of persons with disabilities would have annual incomes within Federal Section 8 income limits, especially those households not active in the labor force. Furthermore, many lower-income persons with disabilities are likely to require housing assistance. Their housing needs are further compounded by design issues and location requirements, which can often be costly. For example, special needs of households with wheelchair-bound or semi-ambulatory individuals may require ramps, holding bars, special bathroom designs, wider doorways, lower cabinets, elevators, and other interior and exterior design features.

Housing opportunities for individuals with disabilities can be addressed through the provision of affordable, barrier-free housing. Rehabilitation assistance can be targeted toward renters and homeowners with disabilities for unit modification to improve accessibility.

Table 14 Disability Status by Age – Eureka

Age Group and Disability	Number	% of Total Population
Under 5 Years	60	0.2%
5 to 17 years	386	1.4%
18 to 34 years	828	3.1%
35 to 64 years	2,106	7.8%
65 years and over	1,801	6.7%
Total	**5,181**	**19.2%**

Source: ACS 2012-2016.

The ACS also tallied the number of disabilities by type for residents with one or more disabilities. Among the disabilities tallied, ambulatory and cognitive difficulties were the most common (**Table 15**).

Table 15 Types of Disabilities – Eureka

	Number of Disabilities Tallied			
Disability Type	Age 5 to 17	Age 18 to 64	Age 65+	Total
With a hearing difficulty	15	529	872	1,416
With a vision difficulty	83	455	278	816
With a cognitive difficulty	216	1,580	361	2,157

Disability Type	Number of Disabilities Tallied			
	Age 5 to 17	Age 18 to 64	Age 65+	Total
With an ambulatory difficulty	47	1,315	1,255	2,617
With a self-care difficulty	27	374	404	805
With an independent living difficulty	--	1,177	806	1,983
Total Disabilities	388	5,430	3,976	9,794

Source: ACS 2012-2016 5-year estimates.

Currently there is no direct source that provides information on the number of housing units in the City equipped to handle the needs of citizens with disabilities. The City does, however, have programs to provide residential rehabilitation loans for handicapped accessibility repairs to low income households, as well as the Senior Home Repair Grant Program which offers small grants to complete needed accessibility improvements to ownership units. Funds are provided on an as needed basis when they become available. There are also a number of programs through Humboldt County for qualifying low-income households that provide funding to complete accessibility improvements.

The Zoning Code contains reasonable accommodations provisions (EMC Section 155.412.080). The language provides a simple, ministerial process for development standard relief for disable persons or their representatives.

Persons with Developmental Disabilities

According to Section 4512 of the California Welfare and Institutions Code a "developmental disability" means a disability that originates before an individual attains the age of 18, continues, or can be expected to continue, indefinitely, and constitutes a substantial disability for that individual which includes mental retardation, cerebral palsy, epilepsy, and autism. The term also includes disabling conditions found to be closely related to mental retardation or to require treatment similar to that required for individuals with mental retardation, but does not include other handicapping conditions that are solely physical in nature.

Many persons with developmental disabilities can live and work independently within a conventional housing environment. Persons who are more severely disabled may require a group living environment where supervision is provided. The most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. Because developmental disabilities exist before adulthood, the first issue in supportive housing for the persons with developmental disabilities is the transition from the person's living situation as a child to an appropriate level of independence as an adult.

The State Department of Developmental Services (DDS) currently provides community-based services to approximately 338,000 persons with developmental disabilities and their families through a statewide system of 21 regional centers, four developmental centers, and two community-based facilities. The Redwood Coast Regional Center is one of 21 regional centers in the State of California that provides point of entry to services for people with developmental disabilities. The center is a private, non-profit community agency that contracts with local businesses to offer a wide range of services to individuals with developmental disabilities and their families.

In October 2018, the City contacted the Redwood Coast Regional Center to obtain the number of individuals with developmental disabilities in the City of Eureka by zip code and age. In 2018, the Redwood Coast Regional Center reported that there were approximately 715 individuals from the City of Eureka zip codes accessing services (**Table 16**). Of this total, the majority of those accessing services were under the age of 18 (80 percent).

Table 16 Persons with Developmental Disabilities

Age Range	Persons
0-17	574
18+ years	141
Total	**715**

Source: California Department of Developmental Services 2018.

To assist with any housing needs for persons with developmental disabilities, the City will implement programs to coordinate housing activities and outreach with the Redwood Coast Regional Center and encourage housing providers to designate a portion of new affordable housing developments for persons with disabilities, especially persons with developmental disabilities, and pursue funding sources designated for persons with special needs and disabilities.

As reported in the 2009-2014 Housing Element, Eureka has a population of mentally ill individuals who require varying levels of support. It has been suggested that Eureka has a larger concentration of individuals with psychiatric disabilities than Humboldt County as a whole; and Humboldt County has the fifth highest schizophrenia rate in the state. According to Raven Project, many of the mentally ill are homeless, and it is estimated that there are between 200 and 400 homeless youths that are mentally ill. Many people with mental illness fluctuate in their ability to care for themselves and are in need of support services to remind them to take medication and assist with general daily duties. A need exists for supportive housing opportunities that can accommodate the mentally ill. Without safe and stable housing, it is impossible for someone with serious mental illness to stabilize and go on with full lives. If these individuals are on the street, they usually end up being victimized by others, breaking the law and going to jail, and/or are introduced to drugs.

Supportive services for the mentally ill are being provided at the Waterfront Recovery Services facility at 2413 2nd Street where individuals can be referred by the County Health and Human Services Department. Transportation is provided to low-income persons with developmental disabilities by the Humboldt Community Access and Resource Center. The recently adopted Zoning Code does not contain any separation requirements between the “Non-medical Care Housing Large/Small” land uses, which includes “group homes”. This land use is defined specifically as “a state-licensed residential facility that provides non-medical social and personal care for residents. Includes community care facilities as defined in California Health and Safety Code (H&SC) Section 1500 et seq, residential care facilities for the elderly (H&SC Section 1569 et seq.), facilities for the mentally disordered or otherwise handicapped (California Welfare and Institutions Code Section 5000 et seq.), alcoholism or drug abuse recovery or treatment facilities (H&SC Section 11834.02), supportive housing (California Government Code Section 65582), transitional housing (California Government Code Section 65582), and other similar facilities.

Large Households

Large households are defined as households with five or more persons living together in one housing unit. According to the 2012-2016 ACS there are 685 households with five or more occupants representing over 6 percent of the total households in the City. As shown in **Table 17**, there are a total of 230 large owner-occupied households and 455 large renter-occupied households.

Table 17 Large Households by Tenure – Eureka

Number of Persons in Unit	Owner-Occupied	Renter-Occupied	Total
Five	137	310	447
Six	54	88	142
Seven or More	39	57	96
Total	**230**	**455**	**685**
Percent of Total Households	*2.1%*	*4.2%*	*6.2%*

Source: ACS 2012-2016 5-year estimates.

Difficulties in securing housing large enough to accommodate all members of a household are heightened for renters, because multi-family rental units are typically smaller than single-family units. Apartment complexes in the City offering three- and four-bedroom models are few. Large families in Eureka, therefore, may satisfy their housing needs mostly through the rental and ownership of single-family units, for which there appears to be sufficient stock.

Female-Headed Households

Female-headed households are included as a special needs group because there often is a conflict between the economic needs of the home and the daycare needs of the family. Historically, females in this situation earn less income than the rest of the population, restricting their ability to provide for both housing and daycare. According to the 2012-2016 ACS, there were 1,332 female-headed households in the City; 60 percent of which had children under 18 years old. Of the female-headed households with children under 18 years old, 28 percent were below the federally established poverty level, compared to the County, where approximately 43 percent of the total were below the poverty level.

Farmworkers

Farm workers are traditionally defined as persons whose primary incomes are earned through seasonal agricultural work. Farm workers have special housing needs because they earn lower incomes than many other workers and move throughout the year from one harvest location to the next. In the 2012-2016 American Community Survey, approximately 101 people were classified as working in the Agriculture, farming, fishing and forestry industry sector. This total amounts to less than one percent of the total employed residents living in the City. It is possible that residents commute to other areas in the region to work in agricultural related industries, however, the demand for housing generated by farm workers in the City is estimated to be extremely low. The City does have a number of affordable multi-family units that provide housing for employees in this sector.

Extremely Low-Income Households

According to 2011-2015 Comprehensive Housing Affordability Strategy (CHAS) data generated for the City, there were approximately 3,060 extremely low- and very low-income households living in Eureka. Generally, Eureka's unskilled labor wages come very close to the extremely low wage earner level, and include occupations such as child care workers, food preparation and serving, manicurist and pedicurist, and restaurant host and hostess. There are approximately 1,515 extremely low-income households in Eureka (renters and owners).

There are limited opportunities to address the housing needs of extremely low-income households in Eureka. However, the special needs of this group are taken into consideration and are generally addressed through the City's overall programs for housing affordability. Table 37 in the affordability section details the housing cost burden for each income group, showing the high cost burden for the extremely low-income group. Extremely low income is a subset of the very low-income households and is defined as 30 percent of area median income and below. It is presumed that 50 percent of very low-income households qualify as extremely low-income households.

Homelessness

The U.S. Department of Housing and Urban Development defines chronic homelessness as an unaccompanied individual with a disabling condition who has been continually homeless for one year or more; or has experienced four or more episodes of homelessness within the past three years. Throughout the country, homelessness has become a major concern. Factors contributing to the increase in homeless persons and families and those in need of shelter and transitional housing include:

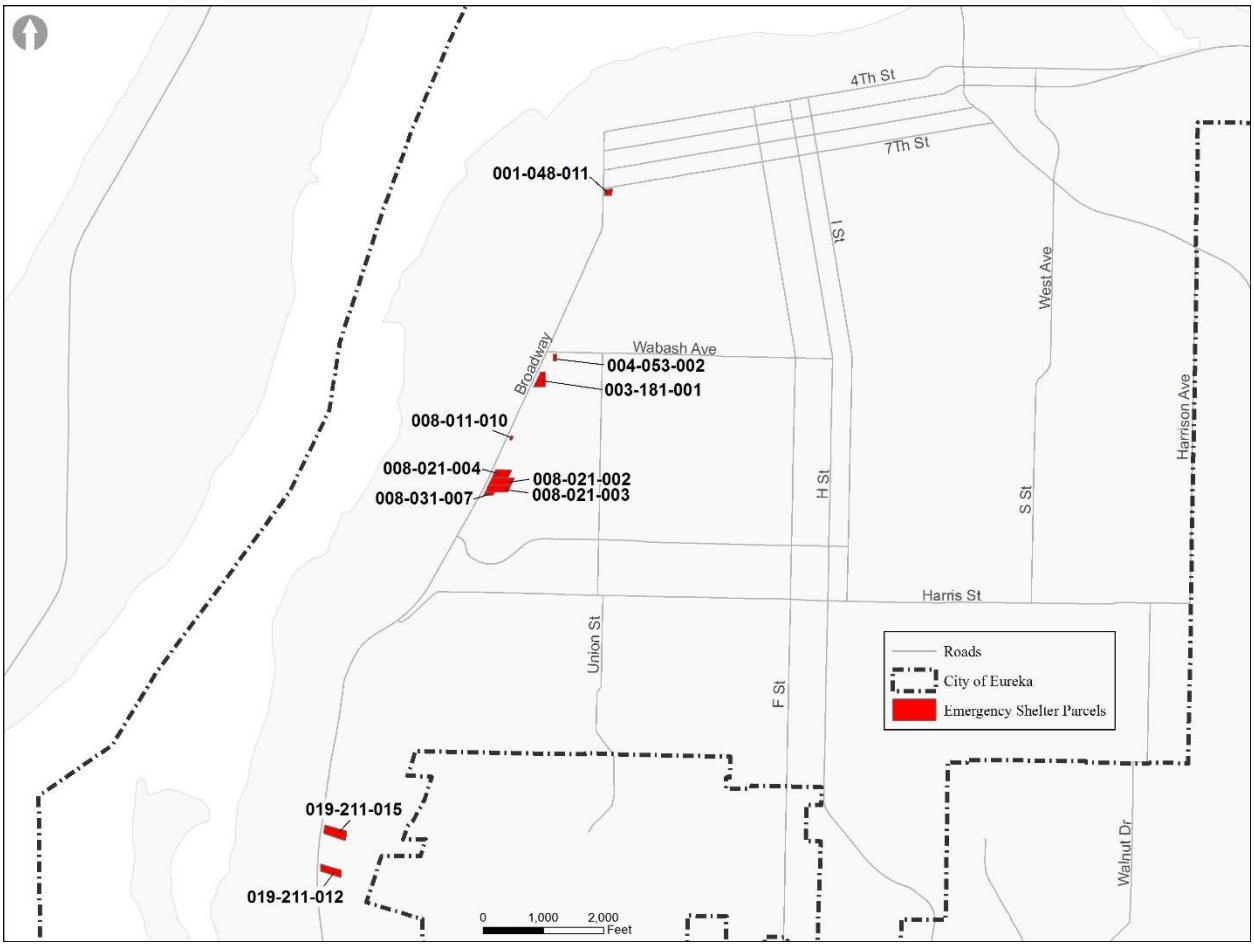
- The lack of housing affordable to very low- and low-income persons;
- Increases in unemployment or under-employment;
- Reductions in government subsidies;
- Deinstitutionalization of the mentally ill;
- Domestic violence;
- Drug addiction; and
- Dysfunctional families.

The State of California defines emergency shelters, transitional housing and supportive housing as follows:

- ***Emergency Shelter*** *(per Health and Safety Code 50801):* Housing with minimal supportive services for homeless persons that is limited to occupancy of six months or less by a homeless person. No individual or household may be denied emergency shelter because of an inability to pay.
- ***Transitional Housing*** *(per Health and Safety Code 50675.2(h)):* Buildings configured as rental housing developments, but operated under program requirements that call for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months.
- ***Supportive Housing*** *(per Health and Safety Code 50675.14(b)):* Housing with no limit on length of stay, that is occupied by the target population as defined in subdivision (d) of Section 53260, and that is linked to on-site or off-site services that assist the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community.

The housing needs of homeless persons are generally more difficult to measure and assess than those of any other population subgroup, as individuals are typically transient and are not likely to be fully counted in a door-to-door census count. In February 2018, the Humboldt Housing and Homeless Coalition (HHHC) conducted a Point-in-Time count and survey of people without housing in Humboldt County for those staying in shelters, and in January 2019 for those unsheltered, as mandated by the federal Department of Housing and Urban Development (HUD).

Figure 6 Map of Potential Emergency Shelter Sites (Senate Bill 2)



Volunteers identified 1,470 unsheltered homeless individuals living in the County, of which 653 adults and children lived in the Eureka area. This is compared to 263 adults and children who are homeless in Arcata, and 83 adults and children who are homeless in Fortuna. **Table 18** shows the number of shelter beds available to accommodate people experiencing homelessness on any given night.

To facilitate and encourage the development of additional emergency and transitional and supportive housing, as per the requirements set forth in Senate Bill 2, emergency shelters are permitted by right within the SC (Service Commercial), SC-CZ (Service Commercial - Coastal), and LI-CZ (Light Industrial - Coastal) zoning districts. **Table 19** lists a sample potential sites available to host emergency shelters.

Table 18 Emergency Shelter Sites and Beds – Eureka

Program	Beds
Betty's House Family Shelter	33
Redwood Community Action Agency	
Our House - Runaway Youth	5
Eureka Rescue Mission	
Women and Children	25
Men's Shelter	152
Total Estimate of Bed Space	**215**

Source: RCAA; Homeless Coordinator, City of Eureka.

Table 19 Potential Emergency Shelter Sites (Senate Bill 2)

Parcel APN	Parcel Size (Sq. Ft.)	Potential Guests	Address	Current Use
008-011-010	2,680	12	2235 Broadway	Motel office
001-048-011	11,787	54	801 Broadway	Motel
008-021-003	96,048	218	2501 Broadway	Vacant lot
008-021-002	49,952	227	2431 Broadway	Retail/storage
008-021-004	33,976	154	2411 Broadway	Motel
008-031-007	9,990	45	Broadway	Vacant
003-181-001	40,600	185	1921 Broadway	Motel
004-053-002	6,600	30	621 W. Wabash	Vacant/utility
019-211-012	41,400	188	4255 Broadway	Motel
019-211-015	54,000	245	4033 Broadway	Motel
Total	9.66 (Acres)	1,694		

Source: City of Eureka, 2018.

All sites listed in Table 19 are served by developed roads and have access to utilities such as water, sewer, and power. The sites are all located in the Broadway corridor which is well served by transit. Further, because emergency shelters are principally permitted in the Service Commercial (SC) zone, there are hundreds of additional parcels eligible to contain an emergency shelter.

Transitional and Supportive Housing

To assist families and individuals experiencing temporary homelessness, the City of Eureka has a number of transitional and supportive housing facilities. Pursuant to Senate Bill 2, the City has amended the Zoning Code to permit supportive and transitional housing and to treat them as a residential use subject only to the requirements imposed on other residential uses permitted within the same zoning district. Additional information regarding the zoning of transitional and supportive housing is provided in the Housing Constraints section.

Community groups that have historically received funding and currently manage transitional housing facilities, include: Redwood Community Action Agency, Alcohol Drug Care Services, North Coast Veterans Resource Center, and North Coast Substance Abuse Council. The existing transitional housing units currently serve the needs of women, youth, veterans, and recovering drug and alcohol addicts. Table 20 provides a summary of the transitional and supportive housing facilities available in Eureka.

Table 20 Transitional and Supportive Housing – Eureka

Program	Beds
Alcohol/Drug Care Services (2109 Broadway - Serenity Inn)	40
Alcohol/Drug Care Services (1321 C St)	7
Alcohol/Drug Care Services (1335 C St - Currently Non-Op)	9
Alcohol/Drug Care Services (1742 J St)	7
Alcohol/Drug Care Services (14th St)	7
Waterfront Recovery Services (139 Y St)	36
North Coast Veterans Resource Center - (109 & 121 4th St)	34
RCAA Launch Pad - Homeless Youth	17
RCAA Bridge House/Safe Haven	38
RCAA THP Aging Out of Foster Care	10
Total Estimate of Bed Space	**205**

Source: RCAA; Homeless Coordinator, City of Eureka and HHHC.

Housing Stock Characteristics

A housing unit is defined as a house, apartment, or single room occupied as separate living quarters or, if vacant, intended for occupancy as separate living quarters. Separate living quarters are those in which the occupants live and eat separately from any other person in the building and which have direct access from the outside of the building or through a common hall. A community's housing stock is the compilation of all its various types of housing units.

Housing Unit Growth

Housing unit growth can be a good indicator of economic prosperity in an area, and the City's housing stock largely reflects its proximity to regional employment opportunities. Having a reliable source for housing starts, construction, and conversions is imperative to understanding overall housing stock characteristics and housing changes within the City. Although the Census provides housing unit growth statistics for the number of permitted housing units, the numbers provided for the City seemed overinflated and unrealistic. Instead of using Census data, building permit data was obtained from the City of Eureka Building Department.

Calculating housing unit growth is more than simply looking at the number of new units created or permitted. Housing units can also be converted to nonresidential use or can be lost to demolition or fire. Table 21 shows the total units created from 2010-2018 for each housing type, and lists the number of residential units that were lost due to conversion or demolition.

Table 21 Total Units Created 2010-2018 (Affordable and Market Rate)

			2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Single-Family Residential	Gain	New Construction	6		2	6	2		2	2	4	24
	Loss	Demolition	-1	-2	-1	-1	-4		-2	-2	-1	-14
		Loss via Conversion to Nonresidential Use										0
Multifamily Residential	Gain	New Construction			20	4	11		4			39
		Created via Conversion						50		1		51
	Loss	Demolition								-4	-4	-8
		Loss via Conversion to Nonresidential Use										0
Accessory Dwelling Unit (ADU)	Gain	New Construction			3	4	1	1	2	2	2	15
		Created via Conversion	1	4		1	1	2	1	6	6	22
	Loss	Demolition			-1	-2		-1			-1	-5
		Loss via Conversion to Nonresidential Use										0
		Total Creation by Year	**7**	**4**	**25**	**15**	**15**	**53**	**9**	**11**	**12**	
		Net Creation by Year	**6**	**2**	**23**	**12**	**11**	**52**	**7**	**5**	**6**	

Notes:
1. This table includes all units for which a building permit was issued and at least one building inspection has been performed.
2. This table based on California Department of Finance reporting categories.
Source: City of Eureka Building Permit Records

Between 2010 and 2018, 182 net units were created by new construction or by conversion to residential use. This number is calculated by subtracting the number of units demolished from the total number of units created. Two large Low Income Tax Credit projects were constructed during this time, representing 50 deed-restricted low-income units each. Excluding these uniquely large projects, Eureka has produced an average of 10 dwelling units per year from 2010 through 2018.

Table 22 through **Table 26** below show details for individual permits by parcel for single-family residential, multi-family residential, ADU, demolition, and legalized units within the City of Eureka from 2010-2018. **Figure 7** illustrates each of these permits by parcel and type of permit issued.

Table 22 Building Permits Issued for Single-Family Residential Development 2010-2018

APN	Permit #	Units	Description	Affordable or Market Rate	Status
012131038	B10-0912	1	New Single-Family Residence	Market Rate	Under Construction
011103026	B10-1042	1	New Single-Family Residence	Market Rate	Completed
012131036	B10-1274	1	New Single-Family Residence	Market Rate	Completed
012131037	B10-1275	1	New Single-Family Residence	Market Rate	Completed
012131039	B10-1276	1	New Single-Family Residence	Market Rate	Completed
012131041	B10-1277	1	New Single-Family Residence	Market Rate	Completed

APN	Permit #	Units	Description	Affordable or Market Rate	Status
012171018	B12-0174	1	New Single-Family Residence	Market Rate	Completed
011161003	B12-0443	1	New Single-Family Residence	Market Rate	Completed
009262002	B13-0223	1	New Single-Family Residence	Market Rate	Completed
013152041	B13-0302	1	New Single-Family Residence	Market Rate	Completed
004083005	B13-0553	1	New Single-Family Residence	Market Rate	Completed
012023008	B13-0579	1	New Single-Family Residence	Market Rate	Completed
013041005	B13-0863	1	New Single-Family Residence	Market Rate	Under Construction
301101006	B13-1035	1	New Single-Family Residence	Market Rate	Completed
009186008	B14-0274	1	New Single-Family Residence	Market Rate	Under Construction
013064004	B14-0431	1	New Single-Family Residence	Market Rate	Under Construction
006053008	B16-0351	1	New Single-Family Residence	Market Rate	Completed
012055013	B16-0458	1	New Single-Family Residence	Market Rate	Completed
012141033	B17-0179	1	New Single-Family Residence	Market Rate	Under Construction
009281011	B17-0578	1	New Single-Family Residence	Market Rate	Under Construction
001253003	B18-0332	1	New Single-Family Residence	Market Rate	Under Construction
006131012	B18-0388	1	New Single-Family Residence	Market Rate	Under Construction
010011001	B18-0852	1	New Single-Family Residence	Market Rate	Under Construction
010121022	B18-1008	1	New Single-Family Residence	Market Rate	Under Construction

Source: City of Eureka.

Table 23 Building Permits Issued for Multi-Family Residential Development 2010-2018

APN	Permit #	Units	Description	Affordable or Market Rate	Status
004073013	B12-0060	20	Student Housing	Affordable	New Construction
009242014	B13-0055	2	Duplex	Market Rate	New Construction
004012009	B13-1006	2	Two Upper Story Apts. In Mixed Use Building	Market Rate	New Construction
004062001	B14-0123	3	Triplex	Market Rate	New Construction
008022027	B14-0829	8	Eight-Plex	Market Rate	New Construction
004212001	B15-0375	50	Fifty Unit Hotel Conversion (The Lodge)	Affordable	Conversion of Existing Space
001222001	B15-0431	0*	Twelve Unit Apartment Complex	Market Rate	New Construction
004151026	B16-0726	4	Quadplex	Market Rate	New Construction
001131008	B17-0608	1	One Upper Story Apt. In Mixed Use Building	Market Rate	Conversion of Existing Space

Notes: *Building permit for new 12-unit multi-family development issued but project not constructed. Permit currently expired.
Source: City of Eureka.

Table 24 Building Permits Issued Accessory Dwelling Units 2010-2018

APN	Permit #	Units	Description	Affordable or Market Rate	New Construction or Conversion of Existing Space
005162005	B10-0946	1	Above Garage	Market Rate	Conversion of Existing Space
011204017	B11-0139	1	Garage	Market Rate	Conversion of Existing Space
018211003	B11-0184	1	Garage	Market Rate	Conversion of Existing Space
005111009	B11-0533	1	Garage	Market Rate	Conversion of Existing Space
006154038	B11-0836	1	Garage	Market Rate	Conversion of Existing Space
009262002	B12-0178	1	Attached to Garage	Market Rate	New Construction
013181020	B12-0535	1	Detached	Market Rate	New Construction
008111015	B12-0589	1	Attached to Garage	Market Rate	New Construction
006111012	B13-0309	1	Unknown	Market Rate	New Construction
009202017	B13-0371	1	Above Garage	Market Rate	New Construction
011053009	B13-0402	1	Detached	Market Rate	New Construction
011212002	B13-0416	1	Attached to Garage	Market Rate	New Construction
012194008	B13-0651	1	Unknown	Market Rate	Conversion of Existing Space
006271014	B14-0127	1	Unknown	Market Rate	New Construction
012141030	B14-0415	1	Unknown	Market Rate	Conversion of Existing Space
012073005	B15-0268	1	Internal Conversion	Market Rate	Conversion of Existing Space
006063007	B15-0438	1	Detached	Market Rate	New Construction
004132003	B15-0733	1	Internal Conversion	Market Rate	Conversion of Existing Space
010212007	B16-0632	1	Unknown	Market Rate	Conversion of Existing Space
008013006	B16-0923	1	Above Garage	Market Rate	New Construction
018341017	B17-0044	1	Basement Conversion	Market Rate	Conversion of Existing Space
012141033	B17-0179	1	Unknown	Market Rate	Conversion of Existing Space
004051007	B17-0197	1	Attached to Garage	Market Rate	New Construction
005062011	B17-0275	1	Unknown	Market Rate	Conversion of Existing Space
004121009	B17-0629	1	Workshop to ADU	Market Rate	Conversion of Existing Space
012131014	B17-0734	1	Garage	Market Rate	Conversion of Existing Space
010042006	B17-0854	1	Detached	Market Rate	New Construction
013201070	B18-0010	1	Internal Conversion	Market Rate	Conversion of Existing Space
011171003	B18-0034	1	Detached	Market Rate	Conversion of Existing Space
004106007	B18-0097	1	Detached	Market Rate	New Construction

APN	Permit #	Units	Description	Affordable or Market Rate	New Construction or Conversion of Existing Space
009211009	B18-0220	1	Garage	Market Rate	Conversion of Existing Space
010052008	B18-0256	1	Shed to ADU	Market Rate	Conversion of Existing Space
004104003	B18-0328	1	Workshop to ADU	Market Rate	Conversion of Existing Space
012101002	B18-0442	1	Detached	Market Rate	New Construction
010073004	B18-0940	1	Garage to ADU	Market Rate	Conversion of Existing Space

Source: City of Eureka.

Table 25 Demolition Permits Issued for Residential Units 2010-2018

APN	Permit #	Units Lost	Type	Affordable or Market Rate
002053007	B10-0802	1	SFR	Market Rate
006231017	B11-0437	1	SFR	Market Rate
005032005	B11-0945	1	SFR	Market Rate
002171001	B12-0357	1	SFR	Market Rate
004071014	B12-0462	1	ADU	Market Rate
009262002	B13-0315	1	SFR	Market Rate
009233004	B13-0317	1	ADU	Market Rate
004012009	B13-0485	1	ADU	Market Rate
010223004	B14-0102	1	SFR	Market Rate
018192005	B14-0224	1	SFR	Market Rate
004014008	B14-0486	1	SFR	Market Rate
008022027	B14-0568	1	SFR	Market Rate
001048004	B15-0513	1	ADU	Market Rate
011063006	B16-0488	1	SFR	Market Rate
005072005	B16-0686	1	SFR	Market Rate
002071004	B17-0042	1	SFR	Market Rate
006132002	B17-0400	1	SFR	Market Rate
005012001	B17-0565	4	MFR	Market Rate
006201028	B18-0078	1	ADU	Market Rate
001024006	B18-0562	4	MFR	Market Rate
010193003	B18-0841	1	SFR	Market Rate

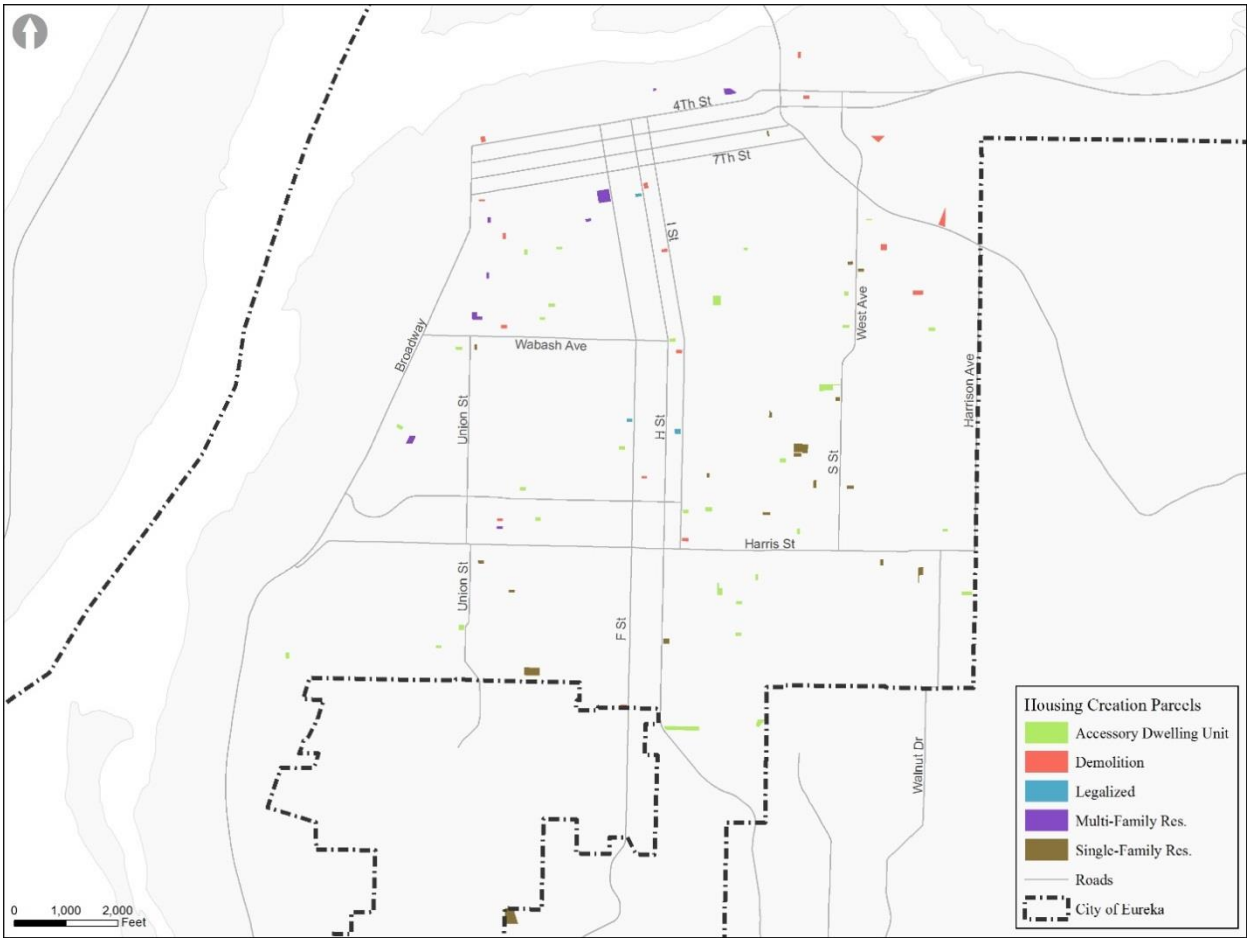
Source: City of Eureka.

Table 26 Building Permits Issued to Legalize Unpermitted Units 2010-2018

APN	Permit #	Units	Description	Affordable or Market Rate	New Construction or Conversion of Existing Space	Status
010202007	B10-0362	1	Unknown	Market Rate	Conversion of Existing Space	Completed
005013004	B10-0823	1	Shed Converted to ADU	Market Rate	Conversion of Existing Space	Completed
011025004	B11-0412	1	Shop Converted to ADU	Market Rate	Conversion of Existing Space	Completed

Source: City of Eureka.

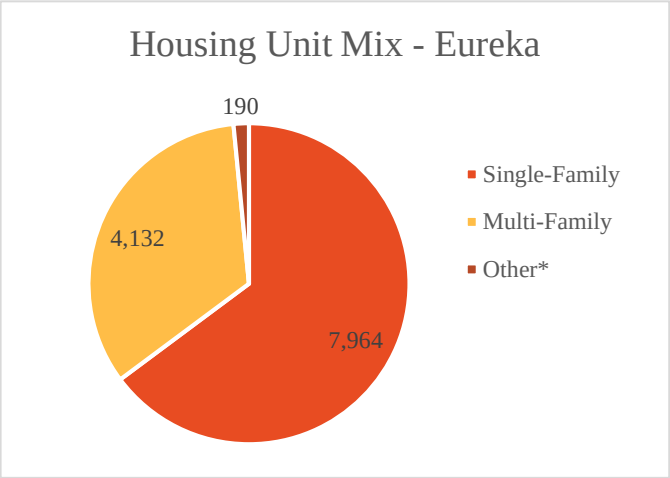
Figure 7 Map of Housing Creation 2010-2018



Housing Unit Mix

Figure 8 shows the make-up of the City's housing stock in 2016 by unit type. The 2012-2016 ACS indicates that single-family detached homes continue to be the predominant housing type in the City; with the majority of growth occurring through the development of 2-4 unit multi-family developments since 2010. Despite the large number of single-family units, the ACS indicates that the proportion of owner-occupied households in Eureka was approximately 46 percent, which is slightly lower than that of renter-occupied households at 54 percent.

Figure 8 Housing Unit Mix In Eureka



Housing Unit Size

In Eureka, the average home is similar in size to those found in the rest of the area. As shown in **Table 27**, between 2012 and 2016, the median housing unit was 4.8 rooms (including living and dining rooms, but excluding kitchens and bathrooms), and 55 percent of the City's housing units had one or two bedrooms. However, even though the average Eureka home is generally large, it is important to note that almost 75 percent of the City's households had two or greater bedrooms, of which about 70 percent consist of two or fewer persons. This shows a large underutilization of housing stock within the city.

Table 27 Housing Unit Size - Eureka

Number of Bedrooms/Rooms	Bedrooms		Total Rooms	
	#	%	#	%
0	644	5.2%	--	
1	2,450	19.9%	565	4.6%
2	4,268	34.7%	813	6.6%
3	3,721	30.3%	1,623	13.2%
4	996	8.1%	2,482	20.2%
5+	207	1.7%	6,803	55.4%
Median	--	--	4.8	--
Total Housing Units	**12,286**	**100.0%**	**12,286**	**100.0%**

Source: 2012-2016 ACS 5-year average.

Age of Housing Stock

Table 28 shows the age of the City's housing stock (by Census Tract) as reported by the 2012-2016 ACS. Age is one way to measure housing stock conditions and a factor in determining the need for rehabilitation.

Without proper maintenance, housing units deteriorate over time. Thus units that are older are more likely to need major repairs and rehabilitation. In addition, older housing units may not be built to current fire standards and building codes. In general, housing over 30 years of age is more likely to experience deferred maintenance issues and may need minor repairs. Housing over 50 years old is considered aged and is more likely to need major repairs. In Eureka, approximately 70 percent of housing units were built prior to 1970, roughly 40 percent were built prior to 1950, and almost 30 percent before 1940. This indicates that a considerable number of the City's housing units are at an age that typically requires additional maintenance.

Table 28 Housing Unit Age by Tract – Eureka

Census Tract	Units	Median Year Built	<1940	1940s	1950s	1960s	1970s	1980s	1990s	2000s	2010s
Tract 1	2,138	1942	1219	176	254	108	138	133	72	38	0
Tract 2	2,622	1949	1050	270	577	221	212	140	26	59	67
Tract 3	2,423	1956	613	139	739	281	251	297	44	39	20
Tract 4	1,702	1976	88	199	202	118	416	328	172	179	0
Tract 5	2,002	1951	851	169	266	158	218	166	77	73	24
Tract 6	2,207	1953	531	281	685	188	165	118	144	95	0
Tract 7	2,525	1966	115	385	444	441	366	188	365	100	121

Source: ACS 2012-16 5-Year Estimates.

Housing Condition

The number of code compliance cases can give some indication of the overall condition of housing in Eureka. Over the past five years, the City has opened approximately 150 cases per year related to substandard buildings and other related violations including vacant and boarded buildings. This is an overall rate of noncompliance of around 1.5 percent. This number is heavily affected by the number of code compliance officers, and where the City allocates those resources. Overall, the condition of housing in Eureka is commensurate with a community with aged housing stock and a physical environment that requires constant upkeep to prevent water intrusion, mold and other issues.

Housing Occupancy

Housing occupancy simply refers to whether a unit is owned, rented, or vacant. Occupancy is an important issue because it reflects the relative income of residents, the cost and affordability of housing, as well as the interaction of market forces on supply and demand of housing. This section addresses occupancy status of the housing stock in Eureka.

Housing tenure refers to whether the occupants of a housing unit own or rent the unit. Tenure typically influences residential mobility, with renters exhibiting a larger degree of mobility than homeowners. **Table 29** compares tenure in Eureka with the region. According to the 2010 Census, Eureka had more renters than owners at approximately 57 percent. This was inverse to the City of Fortuna and Humboldt County which both had a larger proportion of owners than renters. Although the recent development in the City has been primarily multi-family construction, the relatively few units added to the housing stock are not

likely to have any significant impact on the tenure distribution of occupied housing units, but inevitably increases the renter-occupied units.

Table 29 Housing Tenure in 2016 – Eureka

	# Own	% Own	# Rent	% Rent
Arcata	2,468	34.7%	4,643	65.3%
Eureka	5,010	45.7%	5,952	54.3%
Fortuna	2,438	54.9%	2,004	45.1%
Humboldt County	29,702	55.3%	23,987	44.7%

Source: Census ACS 2012-2016.

Vacancy

Vacancies, another aspect of housing occupancy, indicate the demand and availability of housing. In the open market, low vacancy rates are indicative of a housing shortage, which usually restricts residential mobility, increases housing costs, and leads to overcrowding. On the other hand, high vacancies often lead to rent deflation and greater housing affordability, but may decrease property values over time, lower profits for rentals, and discourage maintenance and repairs. In general, an optimal vacancy rate is two percent for owner-occupied housing and 5 to 6 percent for rental units. This level of vacancy is assumed to ensure sufficient residential mobility and housing choice while providing adequate financial incentive for landlords or owners to maintain and repair their homes. A healthy housing market will have a vacancy rate that falls between the two and five percent range.

At the time of the 2012-2016 ACS survey the vacancy rate in Eureka was 1.5 percent. This statistic represents the true number of housing units that are available, as it excludes units that an occupied seasonally (e.g. vacation homes) and those that are unoccupied because they are for sale. This is the lowest vacancy rate in Humboldt County, and points to the pressing need for additional housing.

Table 30 Vacancy

	B25002			B25004 – Housing Stock By Type of Vacancy									
Geography	Total Housing Units	Occupied Housing Units	Vacant Housing Units	For Rent	Rented, Not Occupied	For Sale Only	Sold, Not Occupied	For Seasonal, Recreation, or Occasional Use	All Other	Vacancy Rate	Home-owner Vacancy Rate	Rental Vacancy Rate	Vacancy Rate Minus Seasonal
Humboldt County	62,386	53,689	8,697	770	470	597	331	3,098	3,397	13.9%	1.9%	3.1%	2.4%
Arcata	7,886	7,111	775	170	134	108	23	16	324	9.8%	4.2%	3.4%	3.7%
Blue Lake	554	468	86	0	10	10	18	28	20	15.5%	3.5%	0.0%	2.0%
Eureka	12,286	10,962	1,324	113	42	55	12	179	898	10.8%	1.1%	1.9%	1.5%
Ferndale	808	666	142	17	0	0	0	50	75	17.6%	0.0%	5.3%	2.5%
Fortuna	4,933	4,442	491	129	19	59	26	76	182	10.0%	2.3%	6.0%	4.0%
Rio Dell	1,610	1,397	213	29	0	29	25	53	77	13.2%	3.2%	5.0%	3.9%
Trinidad	204	115	89	8	0	5	0	60	16	43.6%	6.2%	17.0%	10.2%
Balance of County	34,105	28,528	5,577	304	265	331	227	2,636	1,805	16.4%	1.8%	2.8%	2.1%

Source 2012-2016 ACS.

Vacation Rentals

In 2016, the City of Eureka began to regulate short-term rentals. The regulations focused primarily on minimizing potential nuisance impacts to adjacent properties and did not address potential impacts to existing housing stock. At the time of writing, there are 33 permitted short-term vacation rentals in the city with an estimated 100 to 150 non-permitted units operating throughout the year.

As a community focused on developing its tourism economy, the City of Eureka is aware of the benefits that short-term vacation rentals bring to both travelers and operators. The City is also mindful of the risk of displacement of local renters. Responding to these concerns, the City revised its approach to short-term vacation rentals during the 2019 zoning code update. The current zoning code regulates vacation rentals in one of three ways, depending on potential impacts:

- **Full Unit**. The rental of an entire dwelling unit, either with or without the proprietor in residence for the duration of the rental. Includes rental of ADUs. Because this type of vacation rental was deemed most likely to displace local residents, a cap on the maximum number of full unit vacation rentals in residential zones was imposed by City Council.
- **Multiple Room**. The rental of two or more rooms within a dwelling unit with the proprietor in residence for the duration of the rental. Includes bed and breakfast establishments where meals are provided. This type of vacation rental is conditionally permitted in residential zones and is not subject to a cap on the maximum number.
- **Single Room**. The rental of one room within a dwelling unit with the proprietor in residence for the duration of the rental. Includes bed and breakfast establishments where meals are provided. This type of vacation rental was deemed to be the least likely to displace residents and most likely to provide valuable income to owner-occupied homes. For these reasons, single room vacation rentals are principally permitted in all residential zones and are not subject to a cap on the maximum number.

Housing Costs and Affordability

Housing Sale Prices

According to the ACS, the City had a total of 10,962 occupied housing units in 2016. Of this total, owner-occupied units constituted approximately 46 percent of all occupied units in the City. Of the 10,962 units, roughly 95 percent of the owner-occupied units were single-family detached or attached dwelling units. Approximately 3 percent of all owner-occupied units were in buildings with two or more units. Overall, renter-occupied units are primarily found in multi-family buildings (60 percent) while owner-occupied units were primarily single-family dwellings.

Over the last decade, housing stock value has increased from a median home value of $225,750 in 2010 to $275,250 in 2018 (Humboldt Association of Realtors). Although this is a 20 percent increase over a ten-year period, median housing prices were in a decline until approximately 2012 before starting to increase in 2013 (**Table 31**). Despite this increase, the median home value in Eureka was still lower than other cities within Humboldt County and approximately 10 percent lower than the median sale price in the whole County. To better understand the housing price trends in Eureka and the region, **Figure 9** shows median home sale prices since 2010.

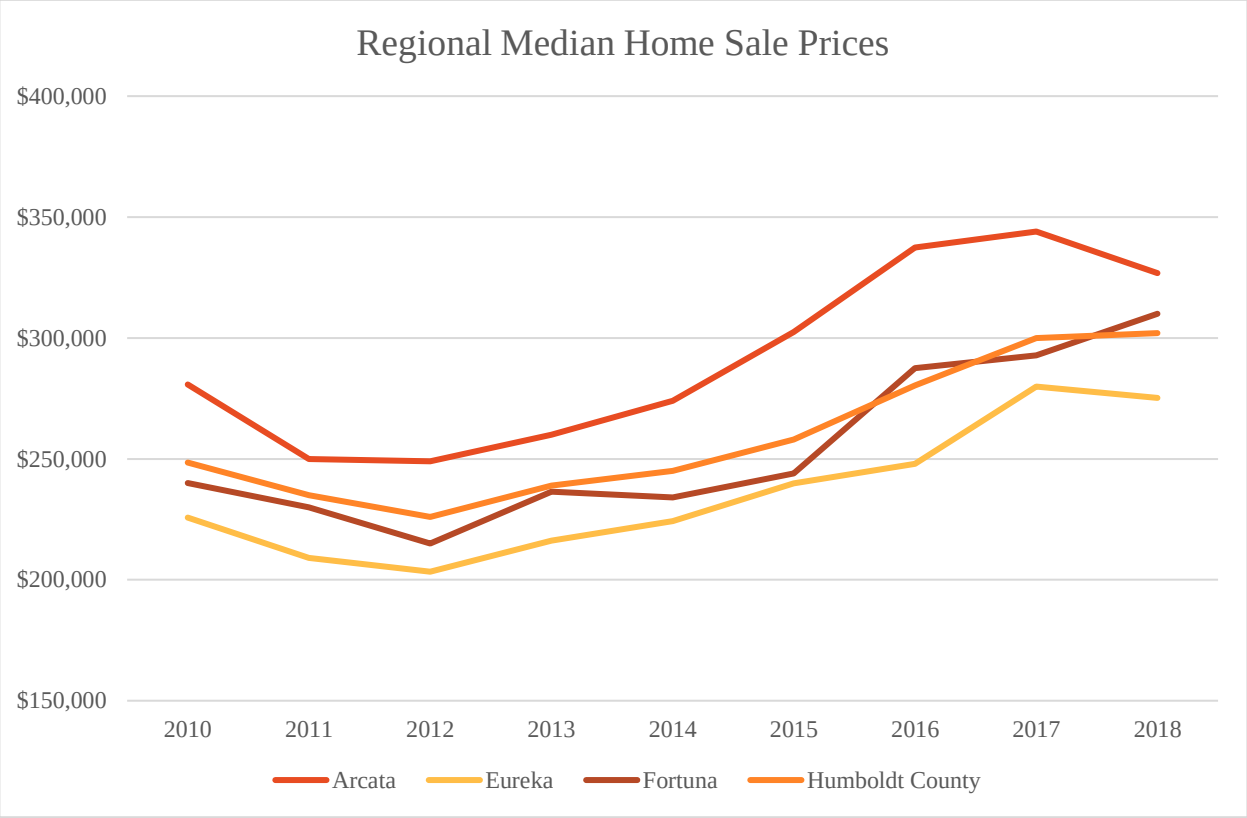
According to the Census, a majority (58 percent) of owner-occupied housing stock is valued between $200,000 and $400,000, with a large number of units (22 percent) valued between $200,000 and $250,000. Only a small number of units (10 percent) were valued below $150,000.

Table 31 Yearly Median Sale Prices

Community	2010	2011	2012	2013	2014	2015	2016	2017	2018
Arcata	$280,800	$250,000	$249,000	$260,000	$274,000	$302,500	$337,450	$344,000	$326,750
Eureka	$225,750	$209,000	$203,343	$216,250	$224,250	$239,900	$248,000	$279,900	$275,250
Fortuna	$240,000	$230,000	$215,000	$236,500	$234,000	$244,000	$287,500	$292,758	$310,000
Humboldt County	$248,500	$235,000	$226,000	$239,000	$245,000	$258,000	$280,341	$300,000	$302,000

Source: Humboldt Association of Realtors, 2018.

Figure 9 Regional Median Home Sale Prices



Rental Rates

According to the 2012-2016 American Community Survey Estimates, there were 5,952 renter occupied units in Eureka in 2016. Of these units, approximately 40 percent of the renter-occupied units were single-family attached or detached homes. The remaining 60 percent were units in buildings with two or more units, with mobile homes and other types of units comprising less than one percent of the total.

According to the 2012-2016 ACS the median gross rent for Eureka was $844 per month. This was lower than other median rents reported for Humboldt County as well as the neighboring cities of Arcata, and Fortuna. **Table 32** provides a comparison of median rental rates for Eureka and its neighboring jurisdictions.

Table 32 Median Rental Rates – Eureka and the Region

Jurisdiction	Median Gross Rent
Arcata	$887
Eureka	$844
Fortuna	$902
Humboldt County	$899

Source: 2012-2016 ACS 5-year estimates.

Additional rent data was obtained from a large local property management company. As shown in the table below, the cost for rental housing in the city is consistently around $1 per square foot. This number is accurate regardless of the number of bedrooms, with the exception of studio apartments, which cost considerably more on a per-square-foot basis than other unit types (**Table 33**).

Table 33 Rent Survey Data – Eureka

Type	Average Monthly Rent	Average Square Feet	Average $/Square Feet
Studio	$585	445	$1.38
1-Bedroom	$685	665	$1.09
2-Bedroom	$882	890	$1.00
3-Bedroom	$1,419	1,432	$1.00
4-Bedroom	$1,865	1,936	$0.98

Source: Local property management company, 2019.

Housing Costs

Affordability is determined by comparing the cost of housing to the income of local households. HUD defines affordable housing costs as contract rents or mortgage payments, including taxes and insurance, but not utilities, that are equal to or less than 30 percent of the gross income of very low-, low-, and moderate-income households.

Households spending more than 30 percent of gross annual income on housing experience a housing cost burden, which occurs when housing costs increase faster than household income. When a household spends more than 30 percent of its income on housing costs, it has less disposable income for other necessities such as health care and nutrition. Lower income households with a burdensome housing cost are more likely to become homeless or experience overcrowding. Homeowners with a housing cost burden have the option of selling the home and becoming renters. Renters, however, are vulnerable and subject to constant changes in the housing market.

For purposes of determining housing affordability, the California Health and Safety Code Section 50052.5 provides the following definition of affordable housing cost based on the area median income (AMI), which is adjusted by family size and income level for each multi-family income (MFI) range (**Table 34**).

Table 34 Affordable Housing Cost Guidelines by Tenure

Income Level	For Sale	Rental
Extremely Low	30% of 30% of AMI	30% of 30% of AMI
Very Low	30% of 50% of AMI	30% of 50% of AMI
Low	30% of 70% of AMI	30% of 60% of AMI
Median	35% of 100% of AMI	30% of 100% of AMI
Moderate	35% of 120% of AMI	35% of 120% of AMI

Note: Affordability level should be adjusted for household size.
Source: AMI - Area Median Income, as established by the State Department of Housing and Community Development (HCD) by county.

Table 35 shows gross rent as a percentage of household income. It is important to note that a significant number of renter households are paying 35 percent or more of their income toward rent and that the number of households doing so has increased since 2010. The median percentage of household income spent on rent payments was 34 percent according to the 2012-2016 ACS. This means that generally residents are spending 34 percent of their income on rent, which is higher than the 30 percent threshold set by HUD. When households are spending a substantial amount of their income on housing and related expenses it means that there is often little money left to cover other necessary expenses. Generally, this information leads to the conclusion that residents living in the City are not living in units that are considered to be affordable based on federal standards.

Table 35 Gross Rent as a Percentage of Household Income

	2010		2016	
Percent of Household Income	Number of Households	Percent of Households	Number of Households	Percent of Households
Less than 15 percent	392	6.5%	299	5.0%
15 to 19.9 percent	456	7.5%	656	11.0%
20 to 24.9 percent	765	12.6%	569	9.6%
25 to 29.9 percent	588	9.7%	732	12.3%
30 to 34.9 percent	787	13.0%	781	13.1%
35 or more	2,749	45.3%	2,766	46.5%
Not computed	329	5.4%	149	2.5%
Total	6,066	100%	5,952	100%

Source: 2012-2016 ACS 5-year Estimates.

Housing Affordability Analysis

The costs of home ownership and rent can be compared to a household's ability to pay for housing using the 2018 HUD-established Area Median Family Income (MFI) limit for Humboldt County of $59,900. Together, this information can show who can afford what size and type of housing and indicate the type of households most likely to experience housing cost burden and overcrowding issues. Table 36 illustrates maximum affordable mortgage payments and rents for multiple-person households in Humboldt County. Affordable housing cost is based on Health and Safety code definitions of affordable housing costs–between 30 and 35 percent of household income depending on tenure and income level. These maximum affordable costs would be adjusted downward for smaller households, or upward for larger households.

Table 36 Housing Affordability Matrix – Humboldt County (2018)

		Affordable Costs		Housing Costs			
Household[a]	Annual Income	Rental	Ownership	Utilities	Taxes and Insurance[b]	Affordable Rent	Affordable Home Price[c]
Extremely Low Income (Under 30% MFI)							
1-Person	$12,600	$315	$315	$107	$63	$208	$32,411
2-Person	$16,460	$412	$412	$121	$82	$291	$46,608
3-Person	$20,780	$520	$520	$154	$104	$366	$58,455
4-Person	$25,100	$628	$628	$190	$126	$438	$69,631
5-Person	$29,420	$736	$736	$226	$147	$510	$81,031
Very Low Income (31 to 50% MFI)							
1-Person	$21,000	$525	$525	$107	$105	$418	$69,966
2-Person	$24,000	$600	$600	$121	$120	$479	$80,249
3-Person	$27,000	$675	$675	$154	$135	$521	$86,285
4-Person	$29,950	$749	$749	$190	$150	$559	$91,371
5-Person	$32,350	$809	$809	$226	$162	$583	$94,052
Low Income (51 to 80% MFI)							
1-Person	$33,550	$839	$839	$107	$168	$732	$126,016
2-Person	$38,350	$959	$959	$121	$192	$838	$144,349
3-Person	$43,150	$1,079	$1,079	$154	$216	$925	$158,432
4-Person	$47,900	$1,198	$1,198	$190	$240	$1,008	$171,565
5-Person	$51,750	$1,294	$1,294	$226	$259	$1,068	$180,786
Moderate Income (81 to 100% MFI)							
1-Person	$50,350	$1,259	$1,469	$107	$294	$1,152	$191,739
2-Person	$57,500	$1,438	$1,677	$121	$335	$1,317	$219,402
3-Person	$64,700	$1,618	$1,887	$154	$377	$1,464	$242,874

Household[a]	Annual Income	Affordable Costs: Rental	Affordable Costs: Ownership	Housing Costs: Utilities	Housing Costs: Taxes and Insurance[b]	Affordable Rent	Affordable Home Price[c]
4-Person	$71,900	$1,798	$2,097	$190	$419	$1,608	$265,675
5-Person	$77,650	$1,941	$2,265	$226	$453	$1,715	$282,160

[a] Affordability definitions of housing costs are per Health and Safety Code Section 50053.
[b] 20 percent of monthly affordable cost for taxes and insurance (owner costs only).
[c] Calculation of affordable home sales prices based on a down payment of 20%, annual interest rate of 5%, 30-year mortgage, and monthly payment 30% of gross household income.
Source: HCD Income Limits, 2018.

Comparison of these maximum affordable housing costs was done taking into consideration recent home sales price data for Eureka, as shown in Table 31. Based on the median home price of $275,250 reported in September 2018, only above moderate-income households could afford to purchase a home. Generally, extremely low-, very low-, low- and even moderate-income households of all sizes could not afford to buy a home within the average market conditions.

Maximum affordable rent can also be compared with area rental prices. Similar to the home market, the affordability problem also persists in the rental market where only moderate-income (greater than 80 percent of MFI) and above can afford median local rental prices found from local rental listings and Census data (Table 33).

Cost Burden

State and federal standards for housing cost burden are based on an income-to-housing cost ratio of 30 percent and above. Households paying more than 30 percent of their income on housing are considered as having a cost burden and have limited remaining income for other necessities. The calculation of cost burden includes utility costs for renters and includes utility costs, taxes, and insurance for homeowners.

Table 37 presents the extent of housing cost burden by income group and household type in the City. Housing cost burden was most prevalent among the City's lower income households and seemed to affect owner households more than renter-households (except in the very low income category). Generally, the incidence of overpayment for housing decreased as a household's income increases. Because few households in the City were small households, cost burden was a much greater issue among larger households regardless of income.

Table 37 Housing Cost Burden in 2011 and 2015 – Eureka

	Percent Households with Cost Burden							
	Extremely Low Income (30% AMI)		Very Low Income (50% AMI)		Low Income (80% AMI)		Moderate/Above Moderate Income (80%+ AMI)	
Household Type	Renter	Owner	Renter	Owner	Renter	Owner	Renter	Owner
Elderly	260	55	200	250	125	385	195	1,325
% with Any Housing Problem	*15.4%*	*18.2%*	*15.0%*	*46.0%*	*52.0%*	*58.4%*	*100.0%*	*85.3%*
% with Cost Burden	*63.5%*	*81.8%*	*85.0%*	*54.0%*	*52.0%*	*41.6%*	*0.0%*	*15.1%*

	Percent Households with Cost Burden							
	Extremely Low Income (30% AMI)		Very Low Income (50% AMI)		Low Income (80% AMI)		Moderate/Above Moderate Income (80%+ AMI)	
Household Type	**Renter**	**Owner**	**Renter**	**Owner**	**Renter**	**Owner**	**Renter**	**Owner**
Small Families	295	75	425	100	530	200	880	1,380
% with Any Housing Problem	*0.0%*	*0.0%*	*18.8%*	*20.0%*	*28.3%*	*27.5%*	*84.1%*	*64.1%*
% with Cost Burden	*100.0%*	*100.0%*	*82.4%*	*85.0%*	*70.8%*	*72.5%*	*15.3%*	*35.8%*
Large Families	65	0	45	25	40	0	150	180
% with Any Housing Problem	*0.0%*	*n/a*	*0.0%*	*40.0%*	*0.0%*	*n/a*	*93.3%*	*75.0%*
% with Cost Burden	*76.9%*	*n/a*	*100.0%*	*60.0%*	*100.0%*	*n/a*	*6.7%*	*25.0%*
All Other	685	75	415	85	900	110	725	505
% with Any Housing Problem	*1.5%*	*13.3%*	*22.9%*	*35.3%*	*36.7%*	*45.5%*	*89.0%*	*63.4%*
% with Cost Burden	*87.6%*	*86.7%*	*78.3%*	*64.7%*	*63.3%*	*54.5%*	*10.3%*	*36.6%*
Total	**1,305**	**205**	**1,085**	**460**	**1,595**	**695**	**1,950**	**3,390**
% with Any Housing Problem	*3.8%*	*9.8%*	*18.9%*	*38.0%*	*34.2%*	*47.5%*	*88.2%*	*72.9%*
% with Cost Burden	*85.1%*	*90.2%*	*82.0%*	*63.0%*	*65.8%*	*52.5%*	*11.3%*	*27.3%*

Notes:
Elderly – Elderly headed households
Small Families – Families with two to four members
Large Families – Families with five or more members
Source: 2011-2015 ACS 5-year Estimates.

Affordable Housing

Conversion

State Housing Element law requires an analysis of the potential for currently rent-restricted low-income housing units to convert to market rate housing, and to propose programs to preserve or replace any units "at-risk" of conversion. This section presents an inventory of all assisted rental housing in Eureka, and evaluates those units at-risk of conversion within 10 years of the start of the planning period. In this case, the timeframe for analysis is 2019-2029.

As shown in **Table 38**, there are a total of 600 rental units and 7 ownership properties with affordable deed-restricted units in the City. Combined, there are 607 deed-restricted affordable units in the city. Table 38 does not include supportive housing units. See Table 20 for a list of supportive housing units.

There is one rental property with affordability covenants (containing 150 units) that is at-risk during the planning period due to an expiring affordability covenant. Generally, these developments or rehabilitations were financed using HOME, CDBG, LOCAL funds, and/or the City of Eureka's Redevelopment Agency Low Moderate Income Housing Fund (LMIHF). Additionally, all the ownership units, as well as the recently rehabilitated Eureka Housing Authority maintain covenants that extend past 2050 and well beyond the planning period.

Table 38 Affordable Housing Inventory

Manager	Project/Address	Total Number of Units	Tenure	Financial Assistance	Covenant Expiration
Eureka Housing Authority	Burrill Street	18	Rent	Public Housing HUD Funded	Permanent
	Elizabeth Street	28	Rent	Public Housing HUD Funded	Permanent
	Everding Street	16	Rent	Public Housing HUD Funded	Permanent
	West Harris	21	Rent	Public Housing HUD Funded	Permanent
	Hiler Street	16	Rent	Public Housing HUD Funded	Permanent
	Prospect Street	12	Rent	Public Housing HUD Funded	Permanent
	Albee Street	8	Rent	Public Housing HUD Funded	Permanent
	W. Buhne Street	3	Rent	Public Housing HUD Funded	Permanent
	B Street	5	Rent	Public Housing HUD Funded	Permanent
	C Street	15	Rent	Public Housing HUD Funded	Permanent
	Clark Street	4	Rent	Public Housing HUD Funded	Permanent
	Garland Street	3	Rent	Public Housing HUD Funded	Permanent
	Spring Street	9	Rent	Public Housing HUD Funded	Permanent
	Summer Street	4	Rent	Public Housing HUD Funded	Permanent
	Union Street	6	Rent	Public Housing HUD Funded	Permanent
	Grant Street	5	Rent	LM/HS	Permanent
	West Del Norte	23	Rent	Public Housing HUD Funded	Permanent
	E Street/Clark	22	Rent	TCAC	2052
	Hawthorne Street	8	Rent	LM/HS	2052
	P Street	21	Rent	LM/HS	2052
	C Street	8	Rent	TCAC	40 year covenant
	I Street	6	Rent	Housing Successor	2048
	E Street	4	Rent	TCAC	Permanent
	9th Street	4	Rent	Housing Successor	2048
RCAA	3rd Street Apts.	6	Rent	Housing Successor	2048
	523-525 9th Street	2	Rent	Affordable Housing	Permanent
	C Street Apts.	8	Rent	Housing Successor	2048
	924-926 G Street	1	Rent	Affordable Housing	Permanent
	1100 California Street	11	Rent	LMIHF	Change in Use/ Sale/Transfer
Alcohol/Drug Care Services	2109 Broadway	40	Rent	LMIHF	2031
	1742 J Street	6	Rent	LMIHF	2031
	1321 C Street	6	Rent	LMIHF	2031

Manager	Project/Address	Total Number of Units	Tenure	Financial Assistance	Covenant Expiration
	217 14th Street	6	Rent	LMIHF	2032
Danco Property Management	The Lodge at Eureka	49	Rent	HOME/TCAC/COE	2072
North Coast Veterans Resource Center	109 & 121 4th Street	34	Rent	CDBG	Permanent
Vietnam Veterans of Northern CA	917, 919, 919 ½, E Street	12	Rent	LMIHF	Change in Use/ Sale/Transfer
Silvercrest/ Salvation Army	2141 Tydd Street	150	Rent	Section 202/ Section 8	2035
Private Residence	615 Myrtle	1	Own	FTHB/LMIHF	2052
	1659 7th Street	1	Own	FTHB/LMIHF	2055
	1657 7th Street	1	Own	FTHB/LMIHF	2055
	1651 7th Street	1	Own	FTHB/LMIHF	2055
	1661 7th Street	1	Own	FTHB/LMIHF	2055
	1653 7th Street	1	Own	FTHB/LMIHF	2055
	1655 7th Street	1	Own	FTHB/LMIHF	2055

Source: City of Eureka

State Housing Law requires that all Housing Elements include additional information regarding the conversion of existing, assisted housing developments to other than low-income uses (Statutes of 1989 Chapter 1452). This was the result of concern that many affordable housing developments throughout the country were going to have affordability restrictions lifted because their government financing was soon to expire or could be re-paid. Without the limitation imposed due to financing restrictions, affordability of the units could no longer be assured. In order to provide a cost analysis of preserving "at-risk" units, cost must be determined for rehabilitation, new construction, or tenant-based rental assistance.

Rehabilitation

The primary factors used to analyze the cost of preserving low-income housing include: acquisition, rehabilitation and financing. Actual acquisition costs depend on several variables such as condition, size, location, existing financing and availability of financing (governmental and market). **Table 39** provides an estimate per unit of preservation costs for the City of Eureka according to research conducted by City of Eureka staff.

Given that 150 units could potentially convert to market rate during the 2019-2029 period, the cost to preserve affordable units through acquisition and rehabilitation would be roughly $6.6 million. Fortunately, Silvercrest Residence has confirmed that the affordability covenants have been extended to 2035, and are so noted in Table 38.

Table 39 Estimated Rehabilitation Cost of 10-Unit Multi-Family Dwelling

Expenditure	Cost Per Unit
Acquisition	$27,000
Rehabilitation	$15,000
Financing	$2,100
Total Cost Per Unit	**$44,100**

Note: Based on parcel value of $270,000. Rehab cost calculated for "mock" 10 unit multi-family dwelling estimated basic bathroom and kitchen renovations. Conservative 5% interest rate on construction and non-owner-occupied loan.
Source: City of Eureka, 2018.

New Construction

New construction is taken to mean construction of a new development with the same number of units and similar amenities as the one removed from the affordable housing stock. Cost estimates were prepared using local information provided by the Northern California Association of Home Builders. The construction of new housing can vary greatly depending on factors such as location, density, unit sizes, construction materials, and on-site and off-site improvements. **Table 40** depicts new construction costs for a typical apartment in Eureka based on information provided by the Northern California Association of Home Builders.

Table 40 New Construction Replacement Costs

Cost	Cost per Unit[a]
Land Acquisition	$28,750
Construction	$99,000
Financing	$12,775
Total Cost Per Unit	**$140,525**

[a] Based on 600-sq. ft. units on a 4-plex lot at $165 per sq. ft.
[b] Cost per sq. ft. ranged from $165 to $205.
[c] Land Acquisition cost ranged from $100,000 to $130,000.
[e] $165 per sq. ft. $115,000 vacant land cost used in this calculation.
Source: Northern California Association of Home Builders, 2018.

Given that 150 units could potentially convert to market rate during the planning period, the cost to construct new affordable units would be roughly $21 million. Fortunately, Silvercrest Residence has confirmed that the affordability covenants have been extended to 2035, and are so noted in Table 38.

A list of affordable housing funding sources and entities able to preserve and create affordable housing can be found in the Housing Resources section of this document.

Market Constraints

Construction Costs

According to the Northern California Association of Homebuilders (2018) hard construction costs for one multi-family residential development range from approximately $165 to $205 per square foot. Construction costs, however, vary significantly depending on building materials and quality of finishes. Owner-occupied units have higher soft costs than renter-occupied units due to the increased need for construction defect liability insurance. Permanent debt financing, site preparation, off-site infrastructure, impact fees, and developer profit add to the total development cost of a project.

Land Availability and Cost

Eureka is a largely built-out community with very little vacant land that can be developed for housing. The available vacant parcels located within residential zones typically exist because a structure has been demolished following a fire/earthquake or there are significant barriers to development such as easements or topography. According to data from the Multiple Listing Service, 68 vacant parcels were sold in Eureka and the adjacent unincorporated area between 2010 and 2018. The parcels ranged from small infill lots to large multiple acre-size lots on the rural fringe. Prices varied widely from $1.29 to $20.41 per square foot. The mean price per square foot for vacant parcels is $7.25. It is very uncommon in Eureka for existing residential structures to be demolished to make way for new residential development within residential zones. A review of building permit records indicate that this has only occurred once in the last decade when a small single-family home was demolished to construct an eight-unit multi-family development at 735 West Buhne Street.

Availability of Financing

The cost and availability of capital financing affect the overall cost of housing in two ways: initially, when the developer uses capital for initial site preparation and construction and, when the homebuyer uses capital to purchase housing.

The capital used by the developer is borrowed for the short-term at commercial rates, which are considerably higher than standard mortgage rates. Commercial rates nonetheless drop when the overall market rates decrease, so low interest rates have a positive effect on the housing construction market. According to Staff at the Humboldt Association of Realtors construction financing is readily available to single-family home developers building in any Eureka neighborhood. Construction financing for multi-family construction, however, has historically been difficult to obtain. The lack of construction financing for multi-family housing poses a significant constraint on the production of affordable housing in Eureka, as it does in California and the nation in general.

The ability of a person to obtain a home mortgage depends on many factors, such as lending standards and interest rates. These factors vary over time and depend on economic conditions at the state and national level. Local economic conditions in Eureka have little to no bearing on a person's ability to obtain a home mortgage. The local housing market has rebounded in Eureka from its low point in 2012 and homes continue to be bought and sold at a steady rate. This indicates that homebuyers are successfully obtaining mortgages.

Governmental Constraints

Land Use Controls

Local land use regulations have a strong impact on the ability for development to take place within a community. Zoning regulations such as setbacks and off-street parking requirements, while important tools for achieving community goals, often lead to demonstrable reductions in development activities. As described in other sections, the City has taken and will continue to take a wide variety of actions aimed at providing housing opportunities and ensuring housing affordability. As government actions can constrain development and affordability of housing, State law requires that the housing element "address and, where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing."

The principal documents setting forth City policies and standards for residential development are the General Plan, the Local Coastal Program, and the Zoning Ordinance. Other areas of regulation that affect housing cost include the City's development, and planning fees.

General Plan and Local Coastal Program

Eureka's principal land use policy document is the General Plan. The current General Plan, adopted in October 2018, contains the following residential land use designations:

- Estate Residential (ER)
    - Single-family detached homes, ADUs and limited agricultural uses on larger lots. Intended to retain a lower density, rural character compatible with adjacent agriculture, timberland and open space uses. The City may approve the clustering of ER units to preserve significant open space resources.

- **Density**: Up to **4.0 dwelling units** per gross acre, greater density may be allowed through a special permit as provided by the applied zoning district.

- **Low Density Residential (LDR)**
  - Single-family detached and attached homes, ADUs and compatible public/quasi-public uses. Intended to be suburban in character and located in proximity to parks, schools, and public services. Limited neighborhood serving market-commercial uses may be allowed where they enhance the quality of life of the neighborhood and as provided by the applied zoning district.
  - **Density**: Up to one primary unit and one ADU per lot, greater density may be allowed through a special permit as provided by the applied zoning district. Note: Maximum **8.5 dwelling units** per gross acre for new subdivisions.

- **Medium Density Residential (MDR)**
  - Single-family detached and attached homes, multi-family housing, ADUs, and compatible public/quasi-public uses. Intended to compliment the character of adjacent lower density residential and neighborhood commercial development, and be located in proximity to parks, schools, public services, and employment centers. Limited neighborhood serving market-commercial uses may be allowed where they enhance the quality of life of the neighborhood and as provided by the applied zoning district.
  - **Density**: Up to **22 dwelling units** per gross acre (equivalent to maximum of three units on an average 6,000-square-foot City lot); greater density may be allowed through a special permit as provided by the applied zoning district.

- **High Density Residential (HDR)**
  - Higher density multi-family housing, ADUs, and compatible public/quasi-public and related uses. Intended to be urban in character and located in proximity to commercial and employment uses, parks, schools, and public services. Limited neighborhood serving market-commercial uses and limited mixed-use development with residential/neighborhood-serving retail may be allowed as provided by the applied zoning district.
  - **Density**: Up to **44 dwelling units** per gross acre (equivalent to maximum of six units on an average 6,000-square-foot City lot); greater density may be allowed through a special permit as provided by the applied zoning district.

These residential land use designations provide for a wide range of housing types, from single-family detached dwelling units to multi-family apartments and condominiums. Given the prevailing housing market conditions, these densities can accommodate the housing needs of all household income levels. In addition to the General Plan, Eureka has an adopted and Coastal Commission-certified Local Coastal Program (LCP), consisting of an Implementation Plan (Zoning Code) and a Land Use Plan (General Plan), which regulate development for approximately 1,500 acres of land that lie within the Coastal Zone. The LCP contains residential land use designations and allowable residential densities similar to those in the General Plan. Within this document, reference to the term “Zoning Code” refers all local zoning regulations including those applicable in the Coastal Zone (i.e., the Implementation Plan of the Local Coastal Program (LCP)). It is important to note that only approximately 60 acres of land designated for residential use lies with in the coastal zone. In addition, state law regulates the demolition of existing low- and moderate-income dwelling units and requires the inclusion of low- and moderate-income housing in new housing development within the Coastal Zone(Government Code Section 65590).

Housing in the Coastal Zone

There are only 62 acres of land in the Coastal Zone zoned Residential, which represents approximately 2 percent of the city's total amount of residentially zoned land. This provides an advantage to the City in that the local government is able to revise development standards in the inland portion of the city more quickly, and without state oversight. This means that many of the innovative housing creation strategies contained in the updated Zoning Code already apply to 98 percent of the residentially-zoned parcels in the City and a large majority of mixed-use zones. Outside of the Coastal Zone, the City is focused on non-site-specific housing creation strategies of ADUs, small/conservation subdivisions, and conversion/division of existing space. Few sites listed in Table 54 54 (Vacant Sites) and no sites are listed in Table 55 (Nonvacant Sites) are located in the Coastal Zone, In total, only 10 percent of units allocated on a site specific basis (e.g. listed in Tables 54 & 55) are located within the Coastal Zone. Of these 95 units, all are expected to be Moderate or Above Moderate Income units. No Low Income or Very Low Income units have been allocated to sites within the Coastal Zone. , The City is working diligently to update the Local Coastal Program, and has received an SB2 planning grant to explore residential development potential in the Coastal Zone.

Zoning Code

Under state law, cities and counties have broad latitude in establishing zoning standards and procedures. Outside of a general requirement for consistency with the general plan, requirements for open space zoning, and several requirements governing residential zoning, state law establishes only broadly the scope of zoning regulation and sets minimum standards for its adoption and administration.

Residential Zones

The Zoning Code contains three residential and one resource zone where residential uses are allowed by right (i.e., without a conditional use permit). Multi-family residential uses are permitted by right in the R2 and R3 zones.

- Residential Estate (RE)
- Residential Low (R1)
- Residential Medium (R2)
- Residential High (R3)
- Agricultural (A)

Mixed-Use Zones

The Zoning Code contains thirteen mixed-use zones that allow multi-family housing by right. New single-family residential uses are not permitted.

- Downtown (DT)
- Downtown West (DW)
- Service Commercial (SC)
- Henderson Center (HC)
- Neighborhood Commercial (NC)
- Wabash Avenue (WA)
- Office Residential (OR)
- Old Town (OT)
- Bayfront Commercial (BC)
- Library District (LD)
- Marina District (MD)

- Gateway North (GN)
- Bridge District (BD)

Additional Zones Permitting Residential Uses

The zoning code contains three zones that permit residential uses with a Conditional Use Permit:
- Hospital Medical (HM)
- Hinge (HN)
- Light Industrial (LI)

Development Standards – Residential Districts

Table 41 and **Table 42** following contain summaries of the basic development standards present in all zones in which housing is permitted by right. Some requirements have been condensed and simplified for clarity. The full requirements may be found in Chapters 155 and 156 of the EMC.

Table 41 Development Standards for Single-Family Residential Zones

Standard	RE	R1
Minimum Lot Area	10,000 sq. ft.	5,000 sq. ft.
Maximum Density	4 du/acre	1 du/lot
Minimum lot area per unit	10,000 sq. ft.	5,000 sq. ft.
Maximum Site Coverage	35%	60%
Maximum Building Height	35 ft.	35 ft.
Front Setbacks	15 ft.	10 ft.
Exterior Side Setbacks	15 ft.	5 ft.
Interior Side Setbacks	15 ft.	5 ft.
Minimum Rear Setbacks	0-10 ft.	0-10 ft.

Note: Setbacks vary by building height and neighborhood precedent.
Source: City of Eureka

Table 42 Development Standards for Multi-Family Residential Zones

Standard	R2	R3
Minimum Lot Area	2,000 sq. ft.	2,000 sq. ft.
Maximum Density	22 du/acre	44 du/acre
Maximum Floor Area Ratio (FAR)		
Lots less than 4,000 sq. ft.	0.55	0.7
Lots 4,000 – 4,999 sq. ft.	0.7	0.85
Lots 5,000 – 5,999 sq. ft.	0.9	1
Lots 6,000 sq. ft. and above	1	1.15

Standard	R2	R3
Maximum Site Coverage		
Lots less than 4,000 sq. ft.	50%	60%
Lots 4,000 - 5,999 sq. ft.	60%	70%
Lots 6,000 sq. ft. and above	70%	80%
Maximum Building Height		
Lots less than 4,000 sq. ft.	24 ft.	24 ft.
Lots 4,000 - 5,999 sq. ft.	28 ft.	28 ft.
Lots 6,000 sq. ft. and above	35 ft.	35 ft.
Front Setbacks	10 ft.	10 ft.
Exterior Side Setbacks	5 ft.	5 ft.
Minimum Interior Side Setbacks	5 ft.	5 ft.
Minimum Rear Setbacks	10 ft.	10 ft.

Note: Setbacks may vary by building height and neighborhood precedent.
Source: City of Eureka

Development Standards - Mixed-Use Zones

Table 43 Development Standards for Mixed-Use Zones

Zone	Max. Density	Min. Lot Area	Max. FAR	Max. Height	Min. Height	Front Setback	Side Setback	Rear Setback
Downtown (DT)	no max.	no min.	6.0	100 ft.	2 stories	0 ft.	0 ft.	0 ft.
Downtown West (DW)	no max.	no min.	6.0	80 ft.	2 stories	0 ft.	0 ft.	0 ft.
Service Commercial (SC)	no max.	no min.	2.5	55 ft.	no min.	0 ft.	0 ft.	0 ft.
Henderson Center (HC)	no max.	no min.	2.5	55 ft.	2 stories	0 ft.	0 ft.	0 ft.
Neighborhood Commercial (NC)	no max.	no min.	3.0	45 ft.	2 stories	0 ft.	0 ft.	0 ft.
Wabash Avenue (WA)	no max.	no min.	3.0	45 ft.	2 stories	0 ft.	0 ft.	0 ft.
Office Residential (OR)	no max.	no min.	2.5	45 ft.	2 stories	0 ft.	0 ft.	0 ft.
Old Town (OT)	no max.	no min.	5.0	4 stories	2 stories	0 ft.	0 ft.	0 ft.
Bayfront Commercial (BC)	no max.	no min.	4.0	5 stories	2 stories	0 ft.	0 ft.	0 ft.
Library District (LD)	no max.	no min.	2.5	4 stories	2 stories	0 ft.	0 ft.	0 ft.
Marina District (MD)	no max.	no min.	2.5	10 stories	2 stories	0 ft.	0 ft.	0 ft.
Gateway North (GN)	no max.	no min.	2.5	4 stories	no min.	0 ft.	0 ft.	0 ft.
Bridge District (BD)	no max.	no min.	2.5	4 stories	2 stories	0 ft.	0 ft.	0 ft.

Source: City of Eureka

The City undertook a comprehensive Zoning Code update immediately following the adoption of the 2040 General Plan. A key to implementing the General Plan's stated goals of removing barriers to the creation of housing was modification of a large number of development standards. Primarily, residential densities were increased while setbacks and other development standards were reduced and/or simplified.

Parking Requirements

The Zoning Code generally requires one off-street parking space per dwelling unit for single-family, multi-family, and mixed-use residential developments. Prior to the 2019 Zoning Code Update, two spaces were required to serve a single-family residence and 1.5 spaces were required for each multi-family residential unit. The updated Zoning Code contains detailed provisions prescribing minimum parking space size, orientation, access, and circulation requirements. Required parking may be reduced by a number of mechanisms provided for in the Zoning Code.

- **Parking Alternatives.** The Zoning Code provides many ways that the required number of off-street spaces may be reduced. These include the proposed development's proximity to transit, ability to share parking, evidence of low parking demand, etc. The following selected reductions are the most likely to result in increased housing production:
- **Affordable and Affordable-by-Design Incentives**. Units that are deed-restricted affordable or are smaller than 500 square feet are categorically exempted from on-site parking requirements. This is intended to reduce costs for low-income housing developers and to encourage market rate developers to increase the number of units in each project.
- **Transit-Related Incentives.** Proposed units that are within a certain distance of a transit stop may reduce the required number of on-site parking spaces between 10 to 30 percent. Units that are deed-restricted such that every resident receives an annual bus pass included in their rent are not required to provide on-site parking spaces.
- **Upper-Floor Residential (Mixed-Use) Incentives**. In order to encourage the conversion of underutilized non-residential space to residential uses, developments that create between four and eight new units are not required to provide on-site parking in Mixed-use zones. For example, eight new units created in the Downtown (DT) zone district would not require on-site parking to be provided.

Design Review

The Zoning Code requires Design Review for New Multi-family developments or additions of 30 percent or more floor area to an existing multi-family residential use. To approve a Design Review application, the Design Review Committee must find that the proposed project complies with the following eight criteria: community character, surrounding context, pedestrian environment, architectural style, articulation and visual interest, materials, and safety. The Design Review Committee does not have the power to modify specified design standards in any way e.g., residential density, FAR, building height, setback, parking requirements, etc. The Design Review process functions in tandem with the prescriptive design standards required in Article 2 of the updated zoning code. These include requirements for multi-family developments to have entrances visible from the street, prohibits blank walls, requires building articulation, etc.

Site Improvements

Eureka requires the installation or improvement of on-site and off-site improvements for residential development. General improvements typically include streets, curb, gutter, sidewalk, streetlights and utilities and amenities such as landscaping, fencing, open space and park facilities, and public access

routes for sites within the coastal zone. In the review of proposals, the Public Works Department typically requires the improvement of the street frontage to half-width (20 feet), the installation of a 6-inch concrete curb and gutter, sidewalks, usually at 6 feet in width and the paving of the 20-foot-wide alley in the rear of the property, if one exists.

Additional improvements are also often required as part of the approval process for a larger residential development. The expected improvement costs for large developments can include the construction of roadway segments, bridges, sewage collection trunk lines, water system improvements, public facilities such as fire substations, and drainage improvements. However, the City has limited large size tracts of land that would trigger such exactions.

The Zoning Code includes provisions for Small Lot Subdivisions and for Conservation Subdivisions to make it easier for the little remaining developable land to be developed. These types of subdivisions will require less site improvements than a conventional subdivision. For example, a 6,000 square feet infill parcel proposed to be subdivided into three 2,000 square feet lots will not be required to build sidewalk and curb within the interior of the development.

Smaller infill projects, such as a new single-family home or a triplex, typically are only required to improve adjacent street frontages, including the installation of curb, gutters, and sidewalks. In most of Eureka's urbanized area, streets and other improvements are already in place. Therefore, development of Eureka's vacant residential infill sites requires few or no frontage or off-site improvements.

Provisions for a Variety of Housing Types

Housing Element Law requires jurisdictions to identify available sites in appropriate zone districts with development standards that encourage the development of a variety of housing types for all income levels, including multi-family rental housing, factory-built housing, mobile homes, emergency shelters, and transitional housing. The following paragraphs describe how the City makes provisions for these types of housing.

Table 44 Housing Types Permitted by Zone District

	RE	R1	R2	R3	DT	DW	SC	HC	NC	WA	OR	OT	BC	LD	MD	GN	BD	HM	HN	LI	A
Single-Family Detached	P	P	P	P								P	P	P		P	P				
Single-Family Attached			P	P	P	P	P	P	P	P	P	P	P	P		P	P	C			
Multi-Family Residential			P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	C	C		
Manufactured Homes	P	P	P	P								P	P	P		P	P				
Farmworker Housing																					P
ADU	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P			
Micro/Shared Housing (SRO)			C	C	C	C	C	C	C	C	C			C		C	C	C	C		
Medical Care Housing	C	C	M	M	C	C	C	C	C	C	C			C		C	C	C			
Non-Medical Care Housing - Large (Transitional and Supportive Housing)			P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	C	C		

	RE	R1	R2	R3	DT	DW	SC	HC	NC	WA	OR	OT	BC	LD	MD	GN	BD	HM	HN	LI	A
Non-Medical Care Housing - Small (Transitional and Supportive Housing)	P	P	P	P								P	P	P		P	P		C		
Emergency Shelters							P												P	P	

Notes: 'P' indicates a principally permitted use; 'C' indicates a conditionally permitted use, "blank" indicates that use is not permitted.
Source: City of Eureka

Accessory Dwelling Units

An ADU is an additional self-contained living unit, either attached or detached from the primary residential unit on a single lot. It has cooking, eating, sleeping, and full sanitation facilities. The City's previous ADU regulations became invalid on January 1, 2017, the effective date of Assembly Bill 2299. The changes in state law represented a considerable loosening of restrictions. In light of the upcoming comprehensive Zoning Code update, the City decided to delay the adoption of a new local ADU ordinance that would be compliant with the state law. Until the Zoning Code update was completed in March 2019, staff administered the state statute directly.

ADUs form a major part of the City's strategy to meet local housing needs. Eureka is a mature community with very little vacant land to construct additional housing. However, Eureka has ample single-family residential properties that are able to accommodate an ADU. According to a 2018 study of existing residential densities, only 9 percent of the 5,057 existing single-family residential properties have an ADU. This means that Eureka could potentially add thousands of ADUs in the future. For additional information regarding the City's ADU strategy, see the Housing Resources section.

Emergency Shelters

Senate Bill 2 requires all jurisdictions to have a zoning district that permits at least one year-round emergency shelter without a Use Permit or any other discretionary permit requirements. Jurisdictions must identify a zone where emergency shelters are permitted by-right within one year from the adoption of the Housing Element. The City has amended the Zoning Code to ensure consistency with the requirements of Senate Bill 2, permitting emergency shelters by right within the Service Commercial (SC), Hinge Industrial (HN), and Light Industrial (LI) zoning districts. Table 19 identifies vacant and underutilized sites, outside of the Coastal Zone, where additional emergency shelter facilities could potentially locate. A map showing the location of these parcels is provided in Figure 6.

Transitional and Supportive Housing

Transitional housing, configured as rental housing, operates under program requirements that call for the termination of assistance and recirculation of the assisted unit to another eligible tenant after a predetermined period. In contrast, supportive housing does not necessarily have a limit on the length of stay, is linked to on-site or off-site services, and is occupied by a target special needs population such as low-income persons with mental disabilities, AIDS, substance abuse, or chronic health conditions. Services typically include assistance designed to meet the needs of the target population in retaining housing, living and working in the community, and/or improving health, and may include case management, mental health treatment, and life skills. Pursuant to Senate Bill 2, the City has amended the Zoning Code to permit supportive and transitional housing as a residential use, subject only to the requirements imposed on other residential uses permitted within the same zoning district.

Manufactured Housing

State law limits the extent to which cities and counties can regulate the installation of manufactured homes, including mobile homes parks. Government Code Section 65852.3 requires that cities allow installation of certified manufactured homes on foundation systems on lots zoned for conventional single-family residences. This section and Government Code Section 65852.4 generally require the same development regulations that apply to conventional homes also apply to manufactured homes. Government Code Section 65852.7 deems mobile home parks to be a permitted use in all areas planned and zoned for residential use. In Eureka, mobile homes are allowed for permanent occupancy in state licensed mobile home and recreational vehicle parks. Manufactured homes, certified under the National Manufactured Housing Construction and Safety Standards Act of 1974, are identified as one-family dwellings subject to façade treatments customarily used on conventional dwellings. Manufactured homes are allowed in all residential districts in the City subject to the same development regulations as other types of housing in the same zone.

Employee Housing

In compliance with Health and Safety Code Section 17021.5, the City of Eureka, does not differentiate between a single-family residence and employee housing providing accommodations for six or fewer employees. Per this section of the Health and Safety Code, employee housing is not included within the definition of a boarding house, rooming house, hotel, dormitory, or other similar term that implies that the employee housing is a business run for profit or differs in any other way from a family dwelling. Additionally, no use permit, or variance is required by the City as employee housing that serves six or fewer employees is treated like a single-family dwelling of the same type in the same zone. Finally, use of a family dwelling for purposes of employee housing serving six or fewer persons does not constitute a change of occupancy for purposes of Part 1.5 (commencing with Section 17910) or local building codes.

In compliance with Health and Safety Code Section 17021.6, employee housing consisting of no more than 36 beds in a group quarters or 12 units/spaces designed for use by a single-family or household is considered to be an agricultural land use within the City of Eureka Municipal Code (EMC). Employee housing is permitted by right for on-site workers, without a use permit or variance.

The City is committed to review the policies and procedures pursuant to the Employee Housing Act, specifically Health and Safety Code Sections 17021.5 and 17021.6 to ensure compliance with state law. If needed, the City will amend its policies and procedures to comply with state law.

Development Processing Procedures and Fees

Another way in which local governments can inadvertently constrain the development of affordable housing is through the imposition of development approval procedures, permit fees, building code requirements, and lengthy permit processing times. This section addresses the relationship of development fees, processes, and standards to the production of housing.

Permit Processing Procedures

Housing development projects in Eureka are subject to various review procedures including environmental review, zoning, subdivision review, design review, use permit control, and building permit approval. The City of Eureka processes development applications in accordance with State Law and application processing is not considered a constraint to development. **Table 45** shows typical permit processing times for various review procedures in the City of Eureka.

For permitted uses in multi-family zoning districts, the Community Development Department reviews the proposal simply for conformance with zoning criteria in conjunction with the building permit review. Both of these reviews are ministerial in nature, limited to a review for conformance with adopted criteria.

Table 45 Typical Permit Processing Times

Type of Application	Estimate Approval Time Period
General Plan Amendment	6-12 months
Local Coastal Plan Amendment	6-12 months
Zone Reclassification	6-12 months
"Major" Subdivision	8-16 weeks
"Minor" Subdivision	8-16 weeks
Use Permit	12-16 weeks
Coastal Development Permit	12-16 weeks
Street Abandonment/Vacation	6-10 months
Lot Line Adjustment	4-6 weeks
Residential Building Permit	1-2 weeks
Variance	12-16 weeks
Design Review	4-6 weeks
Zoning Check for Building Permit	1-2 weeks
Historic Preservation Alteration	4-6 weeks

Source: City of Eureka, 2019.

Construction Timelines

Construction timelines, specifically the average amount of time between project building permit application, building permit issuance, and final inspections can vary widely from project to project depending on a variety of factors. A review of building permit records indicates that between 2010 and 2018, building permits for single family homes were issued 80 days after application. Final inspections for single-family homes occurred an average of 217 days after building permit issuance. Multi-family residential permits were issued an average of 118 days after application, and were received final inspections 216 days after building permit issuance.

Coastal Development Permit Procedures

In addition to standards outlined previously, Eureka has a separate set of zoning regulations for the Coastal Zone. With minor exceptions, however, development standards for residential development within the Coastal Zone are the same as outside the Coastal Zone. With regard to permit procedures, development within the Coastal Zone may be required to obtain a Coastal Development Permit in addition to approvals otherwise required. Environmental analysis is required for all development in the Coastal Zone, and drainage control plans are required for some designated sites. The approval process for projects within the Coastal Zone typically takes between 12 to 20 weeks for a standard development permit or 6 to 12 months if an amendment to the Local Coastal Program is required.

Government Code Section 65588(d) identifies Coastal zone requirements for Housing Elements. According to City Building Department records, 138 new units have been constructed in the Coastal Zone between 1982 and 2010. Between 2010 and 2019, six new market rate units have reached the entitlement stage in the coastal zone, and two market rate units are nearing completion.

According to state law, the conversion or demolition of existing residential dwelling units within the Coastal Zone occupied by persons and families of low or moderate-income shall not be authorized unless provision has been made for the replacement of those units (Government Code Section 65590). In addition, according to State law, the conversion or demolition of any residential structure for purposes of a non-residential use which is not coastal dependent shall not be authorized unless the City determines the residential use is no longer feasible. If the City makes this finding and allows conversion or demolition of any residential structure, it must require replacement of any dwelling units occupied by persons of low- or moderate-income (Government Code 65590). According to City Building Department records, Community Development records, and a review of coastal permits acted on by the State Coastal Commission, no residences in the Coastal Zone were removed during the last Housing Element cycle.

According to Building Department records, 36 low- and moderate-income units were required to be constructed as replacement of demolished low-income units between the years 1978 to 2000; 31 of these were demolished or converted between the years 1978 to 1982. These were all constructed in the Coastal Zone. As provided by State law, new housing developments constructed in the Coastal Zone shall, where feasible, provide housing for persons and families of low- or moderate-income (Government Code Section 65590).

Demolition of Affordable Housing in the Coastal Zone

The conversion or demolition of existing residential dwelling units within the Coastal Zone occupied by persons and families of low or moderate-income cannot not be authorized unless provision has been made for the replacement of those units (Government Code Section 65590). In addition, according to State law, the conversion or demolition of any residential structure for purposes of a non-residential use, which is not coastal dependent, cannot not be authorized unless the City determines the residential use is no longer feasible. If the City makes this finding and allows conversion or demolition of any residential structure, it must require replacement of any dwelling units occupied by persons of low- or moderate-income (Government Code 65590). According to City Building Department records, Development Services records, and a review of coastal permits acted on by the State Coastal Commission, no residences in the Coastal Zone were removed during the last Housing Element cycle.

CEQA

The City, in accordance with State law, also requires the initial study of potential environmental impacts of proposed development projects and, when required, the preparation of a negative declaration or environmental impact report (EIR). Pursuant to the Permit Streamlining Act (Government Code Section 65920), local jurisdictions are required to process development applications promptly. For projects requiring a negative declaration, the maximum permit processing period is six months, and for projects requiring an EIR, the maximum period is 12 months.

Building and Housing Codes

Eureka has adopted various uniform building and housing codes to regulate construction. All codes have been adopted with only minor amendments. Enforcement of the adopted building and housing codes is focused primarily on review of new construction plans to ensure that they comply with minimum health and

safety standards. Applications to modify existing construction are often made to correction of code violations identified through complaints. Violation correction typically results in code compliance without adverse effect upon the availability or affordability of the dwelling units involved. While code enforcement actions occasionally displace low-income persons on a temporary basis (until building code violations can be resolved), they rarely result in the demolition of housing units. During the previous reporting period, this occurred only once. The following building codes have been adopted by the City of Eureka: California Building Code (2016); California Residential Code (2015), California Electrical Code (2016), California Mechanical Code (2015); California Plumbing Code (2015); California Energy Code (2016); California Historical Building Code (2016); California Fire Code (2015); California Existing Building Code (2016); California Green Building Standards Code (2016); Uniform Housing Code (1997). It is anticipated that the City will adopt a number of updated building codes in early 2020

Planning Fees

The City collects fees to offset the costs of permit processing, inspections, environmental review, and the provision of services such as water, sewer, and storm drainage. These fees help ensure quality development and the provision of adequate public services. In addition, developer fees and exactions imposed on new development can help to minimize impacts on existing infrastructure and enable required upgrades of infrastructure consistent with demands of the new development. Development fees are generally assessed based on the number of dwelling units proposed in a given residential development and the fees charged for building permits are based on the construction values as prescribed by the Uniform Building Code (**Table 46** and **Table 47**). The City does not have an inclusionary housing requirement, nor an inclusionary housing in-lieu fee. While these requirements are becoming increasingly common throughout California, Eureka's unique local context is not conducive to a successful inclusionary housing policy due to low development pressure and typically small (2-4 unit) multi-family developments.

Table 46 Community Development Department Fees

Type of Application	Fee
General Plan Amendment	$2,760
Local Coastal Plan Amendment	$2,810
Zone Reclassification	$2,845
"Major" Subdivision	Full Cost including $2000 deposit
"Minor" Subdivision	$725
Conditional Use Permit	$1,015
Coastal Development Permit	$905 - $1,435
Street Vacation	Full Cost including $2000 deposit
Lot Line Adjustment	$530
Variance	$795 - $1,125
Design Review	$800
Historic Preservation Alteration	$0

Source: City of Eureka Fee Schedule 2019-20.

Table 47 Public Works and Engineering Department Fees

Service	Fee
Standard Encroachment Permit	$200
Encroachment Permit Inspection	Actual Cost
Street Tree Permit	Actual Cost
House Moving Permit	Actual Cost
Tentative Subdivision Map Review (4 lots or less)	$300 plus $50/lot
Tentative Subdivision Map Review (5 lots or more)	$400 plus $50/lot
Subdivision Map Check $310 plus $85/lot	Actual Cost + $1000 Deposit
Re-submittal of Subdivision Map, each submittal	$150
Subdivision Improvement Plan Review $300 plus $80 per lot	Actual Cost + $1000 Deposit
Re-submittal of Subdivision Improvement Map $100 plus $50/lot	Actual Cost
Subdivision Construction Inspection	Actual Cost
Traffic Study Review	Actual Cost + $1000 Deposit
Resubmission of Traffic Study Review	Actual Cost
Merger Review	$30
Certificate of Subdivision Compliance Review	$30
Lot-Line Adjustment Review	$255
Lot-Line Adjustment Description Review, each submittal	$120
Street Vacation	$500
Easement Vacation	$545
Conditional Use Permit Review	$150
Coastal Development Permit Review	$150
Design Review	$50
Public Improvement Requirement	$80

Source: City of Eureka Fee Schedule 2018-19.

The fees shown in the tables above are monitored and reviewed constantly and are comparable to adjacent communities. When altering fees, the City complies with all applicable state laws.

Development Impact Fees

The City collects impact fees to offset the cost of the infrastructure required to provide for the community's water, sewer, storm water, and fire protection needs. These fees are distinct from planning fees (e.g., permit application fees) and connection fees (i.e., the cost to physically connect a building to a sewer line). The sewer impact fee is $3,423 per housing equivalency unit (HEU). Water and fire impact fees are described in **Table 48** and **Table 49** following.

Table 48 Water Impact Fees

Meter Size	Fee per Meter
3/4 inch	$3,208
1 inch	$8,021
1 1/2 inch	$16,041
2 inch	$25,666
3 inch	$51,332
4 inch	$80,206
6 inch	$160,412
8 inch	$256,659

Source: City of Eureka Fee Schedule 2018-19.

Table 49 Fire Impact Fees

Residential Uses	Fee per Unit
Single-Family Residence	$701
Multi-Family Development	$552

Source: City of Eureka Fee Schedule 2018-19.

Example Developments

As a means of assessing how fees impact the cost of housing in Eureka, the City has calculated the total Building, Planning, and Engineering fees associated with single-family and multi-family development prototypes. **Table 50** presents the development fees for a typical 3,600-square-foot quadplex residential structure with covered carports, which is consistent with multi-family development in the City, and the development fees for a 2,000-square-foot residential structure with an attached 500-square-foot garage that represents the average single-family home developed in the City.

Table 50 Typical Fees for Residential Development

	Quadplex	Single-Family Unit
Permit or Service Fees		
Building Permit	$8,900	$5,800
Sewer Lateral + Fee	$3,600	$3,600
Water Lateral + Fee	$2,882	$2,882
Manifold + Installation	$500	Not Required
Design Review	$800	Not Required

	Quadplex	Single-Family Unit
Impact Fees		
Sewer	$13,692	$3,423
Water	$8,021	$3,208
Fire	$2,208	$701
Total	**$40,068**	**$19,614**

Source: City of Eureka Fee Schedule 2018-19.

Environmental and Infrastructure Constraints

The primary environmental hazards affecting the development of housing units are steep slopes located in and near the numerous gulches in the City, and low-lying areas of potential flooding. The main infrastructure constraints involve water and wastewater services.

Flood Plain

The City received updated FEMA flood maps in 2017 that showed an increase in the amount of land area designated as high flood risk. Fortunately, these areas are overwhelming located in industrial lands near the bay that contain little to no housing. The city's residential zones continue to be minimally affected, as are the lands located in the city center that are targeted for dense infill development. The City continues to implement Eureka Municipal Code Chapter 153 Flood Hazard Area Regulations which provides for the issuance of floodplain development permits when applicable.

On March 19, 2018, the City of Eureka participated in a Community Assistance Contact (CAC) via conference call with Sarah Owen, NFIP Regulations and Compliance and Michael Ward with the Department of Water Resources, Northern Region Office. Following the conference call, Ms. Owen closed the CAC with no outstanding issues. Ms. Owen stated the City of Eureka and its Staff appeared to have a good understanding of the regulations, and was coordinating well with different departments in the permitting and inspecting processes.

Slope and Wetlands

Numerous wooded gulches and associated wetlands run throughout the City of Eureka. These gulches are primarily located in the southern and eastern portion of the city in areas zoned for single-family residential development. The remaining undeveloped parcels that are located in or near the gulches are costly to develop given the steep slopes and lack of developed roads to provide access. After over a century of residential development in these areas, few easily developable parcels remain. During the Residential Site Inventory process, the identification of steep slopes (>30 percent slope) was a key criteria for determining the realistic development potential of each parcel.

Water

To supply adequate water to residents and businesses, the City maintains a contract water supply with Humboldt County Municipal Water District (HCMWD) for 8 million gallons per day (MGD). In 2010, conservative consumption estimates put Eureka's water usage around 5 MGD. Consequently, water usage

in Eureka is expected to remain well below the current contract limit even with expected growth. To improve water delivery, in 2009, the City completed the construction of five miles of new 24- inch main water transmission line, installed parallel to the existing line. The new pipe utilizes advanced materials and technology proven to withstand the forces of nature more consistently than the old concrete and iron pipe system. This improvement is intended to serve the citizens of Eureka with reliable water supplies for decades to come. Consistent with Senate Bill 1087, which mandates priority sewer and water connections to lower-income housing projects, the City ensures this requirement through a specific program within the Housing Plan.

Wastewater

In 1984, the City of Eureka completed construction of a new wastewater treatment facility to serve Eureka residents and the surrounding area. According to the Regional Water Quality Control Board (RWQCB), in 2009 Eureka's wastewater treatment plant is at about 82 percent of its permitted dry weather capacity of 5.24 MGD. It was estimated by the City Engineer that the City has the capacity to serve approximately 2,000 additional dwelling units or ADUs. To accommodate their fair share allocation of housing units, the City would need to provide sewage service for approximately 609 new units. As little development has occurred since 2009, it is anticipated that the wastewater treatment plant capacity is still sufficient to accommodate Eureka's growth for the near future. To improve existing wastewater collection and transmission infrastructure, the City of Eureka completed the Martin Slough Interceptor Project, which improves wastewater transmission in the southeastern parts of the City of Eureka and the surrounding unincorporated neighborhoods currently served by the Humboldt Community Services District. Wastewater capacity is sufficient to accommodate planned growth.

Housing Resources

Financial Resources

A variety of potential funding sources are available to finance housing activities in Eureka. Due to both the high cost of developing and preserving housing, and limitations on both the amount and uses of funds, layering of funding sources may be required for affordable housing programs and projects. They are divided into five categories: federal, state, county, local, and private resources.

Federal Programs and Funding Sources

Community Development Block Grant (CDBG)

The Community Development Block Grant (CDBG) program is a flexible program that provides communities with resources to address a wide range of unique community development needs.

Home Investment Partnership (HOME)

Eureka can apply to receive HOME funds directly from the Federal government. HOME funds are used to assist low-income (80 percent MFI) households.

Emergency Shelter Grant (ESG) Program

Funds emergency shelters, services and transitional housing for homeless individuals and families.

Neighborhood Stabilization Program (NSP) Funds

Provides funds to purchase abandoned and foreclosed homes and residential property.

Choice Neighborhoods Grants

Funds to address distressed neighborhoods and public and assisted projects to transform them into viable and sustainable mixed-income neighborhoods by linking housing improvements with appropriate services, schools, public assets, transportation, and access to jobs. Planning grants and implementation grants are available.

Section 202 Housing for Seniors

HUD provides capital advances to finance the construction, rehabilitation or acquisition with or without rehabilitation of structures that will serve as supportive housing for very low-income elderly persons, including the frail elderly, and provides rent subsidies for the projects to help make them affordable.

Section 811 Housing for Disabled Persons

Grants to nonprofit developers of supportive housing for persons with disabilities, including group homes, independent living facilities and intermediate care facilities.

Housing Opportunities for Persons with AIDS (HOPWA)

HOPWA is an entitlement grant distributed to the largest jurisdiction in each county. HOPWA funds may be used for a wide range of housing, social services, program planning, and development costs. These include, but are not limited to, the acquisition, rehabilitation, or new construction of housing units; costs for facility operations; rental assistance; and short-term payments to prevent homelessness. HOPWA funds also may be used for health care and mental health services, chemical dependency treatment, nutritional services, case management, assistance with daily living, and other supportive services.

Supportive Housing Program

Provides funding to develop supportive housing and services that will allow homeless persons to live as independently as possible. Grants under the Supportive Housing Program are awarded through a national competition held annually.

Shelter Plus Care

Provides rental assistance for hard-to-serve homeless persons with disabilities in connection with supportive services funded from sources outside the program.

State Programs

Low-Income Housing Tax Credit (LIHTC)

Tax credits are available to persons and corporations that invest in low-income rental housing. Proceeds from the sale are typically used to create housing. Tax credits are available between 4 percent and 9 percent.

Building Equity and Growth in Neighborhoods (BEGIN)

Grants to cities to provide down payment assistance (up to $30,000) to low and moderate-income first-time homebuyers of new homes in projects with affordability enhanced by local regulatory incentives or barrier reductions.

CalHome

Grants to cities and nonprofit developers to offer homebuyer assistance, including down payment assistance, rehabilitation, acquisition/rehabilitation, and homebuyer counseling. Loans to developers for property acquisition, site development, predevelopment and construction period expenses for homeownership projects.

Transit-Oriented Development Housing Program

Under the program, low-interest loans are available as gap financing for rental housing developments that include affordable units, and as mortgage assistance for homeownership developments. In addition, grants are available to cities, counties, and transit agencies for infrastructure improvements necessary for the development of specified housing developments, or to facilitate connections between these developments and the transit station.

CalHFA FHA Loan Program

Provides fixed rate FHA mortgages in Federally Designated Targeted Areas.

CalHFA Homebuyer's Down payment Assistance Program

CalHFA makes below market loans to first-time homebuyers of up to 3 percent of sales price. Program operates through participating lenders who originate loans for CalHFA. Funds available upon request to qualified borrowers.

CalHFA Mental Health Services Act Funds

Jointly administered by the California Department of Mental Health and the California Housing Finance Agency on behalf of counties, the Program offers permanent financing and capitalized operating subsidies for the development of permanent supportive housing, including both rental and shared housing, to serve persons with serious mental illness and their families who are homeless or at risk of homelessness. MHSA Housing Program funds will be allocated for the development, acquisition, construction, and/or rehabilitation of permanent supportive housing.

CalHFA New Issue Bond Program (NIBP)

Provides affordable housing bond funding to CalHFA and other housing finance agencies. This funding allows developers to secure a source of affordable financing in the marketplace which otherwise could not be obtained.

Golden State Acquisition Fund (GSAF)

Affordable Housing Innovation Program (AHIP): provides loans for developers through a nonprofit fund manager to provide quick acquisition financing for the development or preservation of affordable housing

Emergency Housing and Assistance Program Operating Facility Grants (EHAP)

Provides operating facility grants for emergency shelters, transitional housing projects, and supportive services for homeless individuals and families.

Emergency Housing and Assistance Program Capital Development (EHAPCD)

Funds capital development activities for emergency shelters, transitional housing, and safe havens that provide shelter and supportive services for homeless individuals and families.

Emergency Solutions Grant (ESG) Program

Funds projects that serve homeless individuals and families with supportive services, emergency shelter/transitional housing, assisting persons at risk of becoming homeless with homelessness prevention assistance, and providing permanent housing to the homeless population. The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009 places new emphasis on assisting people to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness.

Infill Infrastructure Grant Program (IIG)

Provides grants for infrastructure construction and rehabilitation to support higher-density affordable and mixed-income housing in infill locations.

Multi-Family Housing Program

Provides funding for new construction, rehabilitation, or acquisition and rehabilitation of permanent or transitional rental housing. Projects are not eligible if construction has commenced as of the application date, or if they are receiving 9 percent federal low-income housing tax credits. Eligible costs include the cost of child care, after-school care and social service facilities integrally linked to the assisted housing units; real property acquisition; refinancing to retain affordable rents; necessary on-site and off-site improvements; reasonable fees and consulting costs; and capitalized reserves.

Predevelopment Loan Program (PDLP)

Provides predevelopment capital to finance the start of low-income housing projects.

Affordable Housing and Sustainable Communities (AHSC)

The AHSC program assists project areas by providing grants and/or loans that will achieve Greenhouse Gas Emissions reductions and benefit disadvantaged communities through increasing accessibility of affordable housing, employment centers, and key destinations via low-carbon transportation resulting in fewer vehicle miles traveled (VMT) through shortened or reduced trip length or mode shift from single occupancy vehicles to transit, bicycling, or walking.

Eureka Housing Authority Programs

Eureka Housing Authority

Established in 1946, the Housing Authority of the City of Eureka is another important component of the City's housing efforts for very low- and low-income residents.

Mortgage Credit Certificate (MCC)

Federal tax credit for low- and moderate- income homebuyers who have not owned a home in the past three years. Allocation for MCC is provided by the State and administered by the County.

Housing Choice Vouchers (formerly Section 8)

Rental assistance payments to owners of private market rate units on behalf of low-income (50 percent MFI) tenants.

Security Deposit Letter of Credit Program

This program aids those who cannot afford a first and last month's rent and security deposit to secure private¬-market rental housing. The letter of credit is issued by the Housing Authority and allows for the payment of the security deposit and one month's rent over a one-year period.

Private Resources/Financing Programs

Eureka Family Housing LLP of California

Created in February 1996 by the Housing Authority, the Eureka Family Housing LLP, formerly the Eureka Housing Development Corporation, is responsible for developing housing targeted to low-income seniors, disables, and families.

Federal National Mortgage Association (Fannie Mae)

Fixed rate mortgages issued by private mortgage insurers; mortgages which fund the purchase and rehabilitation of a home; low down-payment mortgages for homes in underserved areas.

National Housing Trust

The Green Affordable Housing Preservation Loan fund through the National Housing Trust Provides below market predevelopment and interim development loans to affordable housing developers who seek to incorporate green building techniques when rehabilitating existing affordable housing. Under the program, a portion of the loan will be forgiven when the developer demonstrates that they have incorporated practical, environmentally friendly design elements in the property's rehabilitation plan.

California Community Foundation

Provides support for general operating of existing nonprofit affordable housing developers, with the focus on supporting the development and preservation of permanent affordable housing.

MacArthur Foundation

Preserving Affordable Rental Housing Program is a $150 million initiative that seeks to preserve and improve affordable rental housing.

Local Banks

Thanks to the Community Reinvestment Act of 1977, commercial banks are required to "meet the credit needs" of all the areas from which they draw deposits. They usually do this through below-market loans to both developers and qualified low-income homebuyers, and grants to community development nonprofits. Many banks have set up a separate community development division, and partner with local organizations that provide services like homeownership counseling to their borrowers. Larger banks often have a separate foundation to handle the grants.

Regional Housing Needs Allocation

State Housing Element law requires that a local jurisdiction accommodate a share of the region's projected housing needs for the planning period. This share, called the Regional Housing Needs Allocation (RHNA), is important because State law mandates that a jurisdiction provide sufficient land to accommodate a variety of housing opportunities for all economic segments of the community. Compliance with this requirement is measured by the jurisdiction's ability in providing adequate land with adequate density and appropriate development standards to accommodate the RHNA. The Humboldt County Association of Governments (HCAOG), as the regional planning agency, is responsible for allocating the RHNA to individual jurisdictions in the region. For the new Housing Element cycle, the City of Eureka has been allocated a RHNA of 952 units, divided into four income levels as follows:

- Very Low Income: 231 units (24 percent)
- Low Income: 147 units (15 percent)
- Moderate Income: 172 units (18 percent)
- Above Moderate Income: 402 units (42 percent)

The City must ensure the availability of residential sites at adequate densities and appropriate development standards to accommodate these units by income category.

Residential Development Potential

Overview of Eureka's Residential Development Potential

An important component of Eureka's strategy to provide for the housing needs of the community lies in the ability for incremental growth in residential districts. A sizeable portion of new housing construction will take place on already developed lots (non-site specific). Small-scale residential infill such as ADUs, small lot subdivisions, conservation subdivisions, and creation of additional units by converting existing space are the most probable means of housing creation in Eureka. The City is largely built-out and there are relatively few developable sites that provide realistic opportunities for new development. The City has adopted a five-part strategy based on the City's existing context and designed specifically to stimulate new housing throughout the City. The five strategies are:

1. Maximize Development Potential of the Remaining Vacant and Underutilized Sites (Focus on Affordable Housing)

2. Accessory Dwelling Units (ADUs)
3. Internal Conversions
4. Small-lot Subdivisions and Conservation Subdivisions
5. Geographically-Dispersed Affordable Housing Through Affordable-by-Design Incentives and Local Density Bonuses

While the first strategy is largely site specific, the other four strategies are non-site-specific. The last four strategies are the most realistic means of generating new Moderate and Above Moderate housing in Eureka. There is a very realistic chance that Eureka could see the majority of future growth in housing through the development of new ADUs, internal conversions of existing buildings, small lot subdivisions, and conservation subdivisions. Affordable housing, conversely, is targeted specifically for publicly owned sites. In May of 2019, the City adopted new regulations that allow for the first time in over 50 years the ability to create internal conversions, small-lot subdivisions, and conservation subdivisions. Through the same action, the City also greatly expanded allowances for ADUs.

These new regulations will stimulate new housing units on already developed lots (non-site-specific) that would not have otherwise been further developed. In contrast to the state mandated site inventory, the individual sites for new ADUs, internal conversions of existing buildings, small lot subdivisions, and conservation subdivisions cannot be anticipated. Because these developments result in the creation of comparatively small housing units (compared to single-family dwellings) they also present a realistic way to create housing for affordable and moderate-income households.

Geographically-Dispersed Affordable Housing through Affordable-by-Design Incentives and Local Density Bonuses (Non-Site Specific)

Through the 2019 Housing Plan, the City of Eureka is committing to promote and incentivize the creation of affordable housing in all future residential developments in Eureka, regardless of location or zone district. The objective is for affordable housing to be geographically dispersed throughout the City. One way to do this is to incentivize the creation of “affordable-by-design” housing units and/or deed restricted housing units in all future residential projects, particularly non-site specific residential developments (such as ADUs, Small Lot Subdivisions, Conservation Subdivisions, and Internal Conversions. For example, when a developer approaches the City with the interest of developing an ADU, the City will encourage the developer to build the units as a small “affordable-by-design” ADU.

In Eureka, “Affordable-by-Design” housing consists of housing units that are less than 500 square feet and are not required to provide dedicated off-street parking spaces. These units are naturally affordable due to their small size, as opposed to being made affordable by the legal mechanism of a deed-restriction. This is because, based on standard rental rates in Eureka (see Table 33: Rent Survey Data), units that are less than 500 square feet are typically affordable to low and moderately low-income households in Eureka (i.e., the rent for such units is often less than 30 percent of the income of low-income households). For instance, the annual household income for a two-person very low income household (31 to 50 percent MFI) in Humboldt County is $24,000 per year, which means that rent at or below $600 per month is affordable. The affordable monthly rent for a one-person low income household (51 to 80 percent MFI) is $839. With an average rental rate of $1 per square foot per month, a 500-square-foot unit is likely to be affordable to both a two-person very low income household and a one-person low income household. Therefore, in Eureka, a small housing unit does not need to be deed restricted in order to be affordable.

Small units are typically most appropriate for one and two-person households, which is a growing demographic sector in Eureka. Affordable-by-Design developments can consist of rental or owner-occupied housing units and may be either attached (e.g., apartment building/condominiums) or detached (e.g., bungalow courts). Another advantage of small units is that they can lead to considerably more density. For example, an Affordable-by-Design development on a 6,000-square-foot lot may have 12 500-square-foot units instead of six 1,000-square-foot units.

Affordable-by-design units can take the form of ADUs, owner-occupied condominium units, upper-floor apartments in a mixed-use development, multi-family rental apartments, townhomes, live/work units, tiny houses, efficiency dwelling units, micro-units, shared housing, and even single-family homes. In each of these cases, the City will provide incentives to developers for a portion of their units to be "affordable-by-design" (i.e., 500 square feet or less). Because affordable-by-design housing can be incorporated into such a diverse range of housing types, the probability of geographic distribution throughout the City is much higher than more traditional forms of affordable housing, which typically consist of single large projects that are complexes of entirely affordable housing.

Finally, the City also has local affordable housing density bonus options that go beyond the density bonuses afforded by State law. The City's local affordable housing density bonuses allow flexibility in development regulations and residential density for affordable housing built within a certain proximity of transit, schools, parks, and other similar amenities.

Accessory Dwelling Units

ADUs are crucial to Eureka's housing strategy, including the need to create affordable housing. Of the 6,261 parcels in in the city that are eligible to contain an ADU, only 262 have already been developed with an ADU. This means that there are 5,999 existing single-family homes in Eureka that could add an ADU. These numbers were estimated by examining the number of electric meters that exist on each parcel. It was assumed that each electric meter represented a distinct housing unit. Even considering that some ADUs are not metered separately from the single-family home, it is clear that Eureka has enormous potential to add additional ADUs.

Because of growing interest in ADUs and strong political support, this plan sets an annual ADU creation target of 20 per year (or 160 by the end of the eight-year housing cycle). The City estimates that 46 of these new ADUs will be 500 square feet or less, meaning that they will be affordable by design. Accordingly, these units fall under the Low Income/Very Low-Income housing targets.

The 20 ADU per year target was set based upon existing trends and the anticipated efficacy of the numerous ADU-related actions listed in Implementation Programs such as Imp H-1; Imp H-2; Imp H-3; Imp H-6; Imp H-7; Imp H-9; Imp H-12. The City began to actively market and encourage ADU creation in 2018, culminating in the ADU Fair held in September 2018. As a result, ADU applications doubled in 2018 and 2019 compared to the earlier years of the decade. From 2010-2018, 37 ADU building permit applications were received. Forty-three percent of ADU applications made in that 8-year time frame were made in 2017 and 2018. Applications for 7 ADUs were received in 2017 and applications for 8 ADUs were received in 2018. Only an average of 2.7 ADU applications were received each year between 2010 and 2016. The plan is to build on this momentum to reach the 20 ADUs per year target.

ADU affordability is estimated to be 71 percent Moderate Income (114 units), 19 percent Low Income (30 units), and 10 percent Very Low Income (16 units). These estimates are based on the anticipated size of the ADUs to be created. The most common way to create an ADU, based on Planning Department observations, is to convert an existing garage. Most garages that are converted tend to be two car garages,

which are on average 350 square feet. Per the Rent Survey (Table 33), a studio apartment rents for $1.38 per square foot. In this example, the estimated rent would be $483 per month, which meets the Low Income threshold for 1 and 2 person households. This example is typical of the Low Income allocation. New construction and large internal conversions (e.g. half story conversion) tend to result in larger units, often around 800 square feet in size. An 800-square-foot new-construction ADU would rent for $872 per month. This example is typical of the Moderate Income allocation. To a much lesser degree, some units will be created by converting single car garages to ADUs. A single car garage is typically around 250 square feet in size. There has been interest demonstrated locally in market-rate new-construction micro units (250 square feet), with one 8-plex under construction in a nearby jurisdiction. The City does not expect large numbers of these very small ADUs to be created, though it anticipates that some likely will be created. At 250 square feet, with an estimated rent of $350 per month, these units will meet in the income thresholds for Very Low Income for 1-person households.

Additional Units via Division or Conversion of Existing Space

A large majority of already-developed sites in the Multi-Family Residential zones are able to accommodate additional units. These sites would most likely add units either by dividing existing units or by converting existing covered parking. An example of dividing an existing unit would be a large single-family home converted into a triplex, without enlarging the building footprint or adding additional floor area. This is made possible primarily by a provision that exempts these types of developments from needing to provide additional on-site parking to serve the newly created units. Because these types of developments make use of existing space, they often have lower construction cost on a per unit basis, which means that the cost-to-benefit ratio for a property owner is often high. Renters benefit because rents can be lower than for new construction housing.

To estimate the potential for additional multi-family units, the City examined all parcels in the multi-family residential zones that had not reached their maximum residential density. Density was estimated by examining the number of electric meters that exist on each parcel. It was assumed that each electric meter represented a distinct housing unit. For example, a parcel that is sized to contain six housing units but only had four units would have the capacity to gain two additional units. Research revealed that 1,228 of 1,321 parcels (92 percent) in the medium density multi-family residential zone (R2) had the capacity to add at least one additional unit. In the high-density multifamily residential zone, 1,366 of 1,399 (98 percent) had the capacity to add at least one additional unit. It is safe to assume that a large portion of these new units will be less than 500 square feet and will therefore be affordable by design.

The City has set a target of 20 units per year to be created by this method (or 160 by the end of the eight-year housing cycle). The City estimates that 46 of these new units will be 500 square feet or less, meaning that they will be affordable by design. Accordingly, 46 of the City's Low Income/Very Low Income housing targets are allocated to the non-site-specific category as "Division or Conversion of Existing Space." See Implementation Programs Imp H-3, Imp H-7, and Imp H-11 for details on how the City plans to achieve this target. For planning purposes, units created via conversion/division of existing space would be considered additional multi-family units and not ADUs. For example, if the garage of a triplex is converted to an additional unit it would be considered an additional multifamily unit. In effect the triplex would become a quadplex.

This housing creation strategy features so prominently in the Housing Element because this form of housing creation was requested the most frequently by developers over recent years. Most rental housing in Eureka consists of single-family homes, duplexes, and four-plexes. Many of these were created by converting large single-family homes (e.g. large Victorian homes). It is a fact that converting existing structures, in all but the

most extreme cases of building neglect, is less expensive that new construction. This means that the return on investment is higher for the developer if they convert a structure rather than building a new development with the same number of units. Because this basic principle of real estate economics is well understood by local property owners, they often express interest in "adding units" to increase the potential revenue that their properties generate. The previous Zoning Code made this difficult by requiring additional parking, open space, and other requirements that made projects infeasible. Since the Zoning Code was updated to reduce/eliminate those barriers, it is reasonable to expect that developers will now be able to proceed with their plans to add units and that additional property owners will be inspired to explore the potential to add units to their properties. This strategy is founded upon local historical precedent, existing market incentives, and proven real estate economics.

Unit affordability is estimated to be 10 percent (16 units) Above Moderate Income, 59 percent (94 units) Moderate Income, 19 percent (30 units) Low Income, and 12 percent Very Low Income (16 units). These estimates are based on the anticipated size of the units to be created. Typically, units created via conversion and division tend to be moderate or small in size. Typical examples of this method of housing creation include the division existing units (commonly single-family homes), conversion of garages (commonly two-car garages), or attic conversions. The City expects that most conversions/divisions will be 350 to 800 square feet in size, with small minority larger or smaller. Based on the Rent Survey (Table 33), the majority would fall into the Moderate or Low Income affordability categories.

Small Lot and Conservation Subdivisions

A small lot subdivision is a type of subdivision located in a multi-family residential zone, typically containing an existing single-family home, that results in the creation of new lots as small as 2,000 square feet. An example would be a 6,000-square-foot lot that contained a small single-story home. The owner of the property could effectively create one or more additional legal lots through a small lot subdivision to "split off" the backyard and sell it as a new buildable lot. Because the newly created lot is relatively small, and can therefore only accommodate a small home, these subdivisions produce housing at a lower price.

Because small lot subdivisions are a new-again concept in Eureka (having been prohibited from the 1960s-2019) it remains to be seen how many new housing units they will inspire. Public and political support is high because small lot subdivisions tend to result in the preservation of existing homes as well as increasing the supply of modestly sized for-purchase homes. The concept has been warmly received by small-scale developers and the local building community, when presented during zoning code update stakeholder outreach.

To estimate the capacity for small lot subdivisions, the City examined all parcels located in multi-family zones (R2 and R3) that were 5,000 square feet or larger whose total lot coverage was 33 percent or less. All structures including residences, garages, and other structures were included in the calculation of lot coverage. It's assumed that parcels containing at least 66 percent open space (area not covered by structures) would be able to accommodate a small lot subdivision. A sample of these parcels were examined in detail by staff to confirm the possibility of a small lot subdivision. Staff performed a detailed evaluation of development standards such as floor area ratios, building heights, and setbacks during the 2019 Zoning Code Update. This analysis centered on exploring a variety of development scenarios in light of the development standards to confirm that maximum densities were achievable throughout the full range of allowable lot sizes. Consider the two following scenarios in the R3 (Residential-High) zone:

Conventional Multi-family Development:
Lot Size: 6,000 square feet
Maximum Density: 44 dwelling units per acre (du/ac) (6 units)

Maximum Floor Area Ratio: 1.15 (6,900 square feet or 1,150 square feet per unit)
Maximum Building Height: 35 feet (three stories)
Setbacks: 10 feet (front), 5 feet (side), 0 feet (rear)

Small Lot Development: (Each of the three resultant lots would conform to the following)
Lot Size: 2,000 square feet
Maximum Density: 44 du/ac (2 units (1 SFR + 1 ADU))
Maximum Floor Area Ratio: 0.7 (1,400 square feet (One 1,000-square-foot SFR + One 400-square-foot ADU)
Maximum Building Height: 24 feet (two stories w/ conventional foundation, 8 feet walls, and 4/12 pitch roof)
Setbacks: 10 feet (front), 5 feet (side), 0 feet (rear), 0 feet (any newly-created lot line)

Both scenarios provide for the creation of six housing units. Depending on the developer, either scenario may appear more advantageous. The total construction cost may be lower on a per-square-foot basis for the conventional six-plex, though the overall immediate project cost would be higher. The advantages of the small lot development are that the housing can be built incrementally (a benefit to small developer), the first lot to be developed can be strategically sold to generate capital to fund the remaining development, and the houses w/ADUs can eventually sold into the large single-family home market intended to be owner-occupied (instead of as an investment property).

In the first eight weeks following the Zoning Code update, three property owners have submitted conceptual drawings for small lot subdivisions. The concepts are similar in that in each case a single approximately 6,000-square-foot lot is proposed to be subdivided into three approximately 2,000-square-foot lots. In each case, the developer preferred the small lot subdivision to the conventional multifamily development. Each plans to develop the housing and rent it until they decide to sell.

As of October 9, 2019, the City has conducted pre-application reviews for three additional conservation/conventional subdivisions proposing a total of 14 new lots. Depending of the ultimate proposal, some or all of these subdivisions may make use of the conservation subdivision provisions. Each developer expressed interest in constructing ADUs alongside the single family homes.

Unit affordability is estimated to be 75 percent (120 units) Above Moderate Income, 25 percent (40 units) Moderate Income. These estimates assume that newly created small lots with contain new-construction single family homes and ADUs. New construction single-family homes are virtually certain to be priced out of the reach of moderate and low income households, despite the fact that floor area ratios will limit the smallest lots to relatively modest sized homes. Conservation subdivisions will yield larger, more expensive homes given their privileged access to protected gulches and open space. It is assumed that 1 in 4 new single-family homes constructed on small lots or in a conservation subdivision will have an associated ADU. These ADUs are expected to rent at the Moderate Income level given their expected square footage. ADUs in excess of 800 square feet are rare in Eureka.

In total, 790 lots were identified that appeared to be good candidates for a small lot subdivision. The following implementation programs are intended to encourage the creation of these subdivisions Imp H-3, Imp H-7, Imp H-9, Imp H-11. For the reasons stated above, the City has set an annual small lot/conservation subdivision-related housing creation rate of 20 per year. Based on the six pre-development meetings completed between June 21 and October 9, which would create approximately 21 Above Moderate Income and 11 Moderate Income units (single family homes and ADUs, respectively), the City is already exceeding the target rate.

Non-Site Specific Housing Creation Targets

Tables 51 through **Table 53** show the number of units expected to be created by each of the primary non-site-specific methods of housing creation. The 480 units represents 50 percent of the overall RHNA target of 952, underscoring the City's belief that most opportunities for housing creation lie on already developed sites throughout the residential zone districts.

Table 51 Summary of Non-Site Specific Housing Creation Targets

	2020	2021	2022	2023	2024	2025	2026	2027	Total
ADU	20	20	20	20	20	20	20	20	**160**
Small/Conservation Subdivision	20	20	20	20	20	20	20	20	**160**
Division or Conversion of Existing Space	20	20	20	20	20	20	20	20	**160**
Total Combined	60	60	60	60	60	60	60	60	**480**

Table 52 Target Affordability of Non-Site Specific Housing

	Very Low Income	Low income	Moderate Income	Above Moderate income	Totals
ADU	16	30	114		**160**
Small/Conservation Subdivision			40	120	**160**
Division or Conversion of Existing Space	16	30	94	20	**160**
Totals	**32**	**60**	**248**	**140**	**480**

Table 53 Summary Table: Targets for Site Specific and Non-Site Specific Housing Development

	Very Low Income	Low Income	Moderate Income	Above Moderate income	Totals
Non-site Specific Targets	32	60	248	140	**480**
Site Specific Targets	278	110	50	302	**740**
Total Targets	**310**	**170**	**298**	**442**	**1220**
Quantified Objective (and RHNA Targets)	*231*	*147*	*172*	*402*	*952*

Residential Site Inventory

Summary of Sites

This section includes the sites, listed individually by APN, that been identified by staff as being suitable for housing creation throughout the 2019-2027 planning period. A specific number of housing units have been allocated to each site. Affordability levels are specified for each unit, broken down into Very Low Income (VLI), Low Income (LI), Moderate Income (MI), and Above Moderate Income (AMI). These two strategies of identifying individual sites as well as broad areas are able to accommodate housing that forms the backbone of Eureka's plan for housing.

Site Selection Methodology – Constraints Identified

All vacant and non-vacant sites listed in Tables 54 & 55 conform to the following site section criteria listed below. These criteria were chosen because they represent the physical constraints likely to limit or prevent the development of any particular parcel

1. **Slope.** Portions of sites with a slope in excess of 30 percent were considered unbuildable. Only the portions of a lot with a slope of less than 30 percent were used to estimate housing potential.
2. **Utilities and Dry Utilities.** All sites identified are located within 200 feet of public utilities. Public utilities include water, sewer, and power.
3. **Access.** All sites identified have at least 30 feet of public road frontage to permit legal access.
4. **Zoning.** All sites are located in zones that allow housing. Sites identified for low income housing allow multi-family residential uses by-right.
5. **Size.** All parcels are sized and dimensioned to accommodate some number of additional dwelling units. Parcels allocated low income or very low-income units are between 0.5 and 10 acres in size, except for publicly-owned parcels subject to Implementation Program H-34 which may be smaller than 0.5 acres. Publicly-owned parcels have been exempted from the requirement due to the unique ability of the government to spur the development of affordable housing on its property, as detailed in IMP H-34.
6. **Previously Existing Low-Income Housing.** No site identified in tables 54 and 55 contained low income housing within the last 5 years

Methodology – Vacant Sites

A site is considered vacant if it contains no structures or existing land uses. Examples of structures includes houses, garages, commercial buildings, etc. Small, portable structures such as skid-mounted garden sheds or hobby greenhouses were not considered structures. A site was considered to have an existing use if activities were taking place that have a monetary value. For example, parking spaces (leased independently or associated with a building), outdoor storage, display areas, etc. Sites consisting of multiple individual parcels have been grouped if they are under common ownership and are contiguous. Additionally, some constituent parcels of sites are without legal access (i.e. "landlocked") and, if considered independently, would not be developable despite clearly being buildable when considered together with the larger site. (**Table 54** and **Figure 10**).

Table 54 Vacant Sites

Site	APN	Area (sf)	Zoning	VLI	LI	MI	AMI	DU/AC
1	Site 1 (Veteran's Site)	26,196	DT	50				81
1	001071001	13,163	DT					
1	001071002	13,033	DT					
2	001261020 (Seventh and Myrtle)	32,854	R2	36				51
3	Site 3	16,687	BD-CZ				8	21
3	002081005	6,282	BD-CZ					
3	002121002	6,515	BD-CZ					
3	002121003	3,890	BD-CZ					
4	Site 4	9,416	BD-CZ				4	19
4	002083001	5,961	BD-CZ					
4	002083002	3,454	BD-CZ					
5	Site 5	14,296	BD-CZ				7	21
5	002095005	6,598	BD-CZ					
5	002095006	7,697	BD-CZ					
6	Site 6	34,014	R1			5	5	13
6	010261010	7,027	R1					
6	010261013	6,748	R1					
6	010261014	20,239	R1					
7	Site 7	19,366	R2				10	22
7	009021001	12,697	R2					
7	009021015	6,669	R2					
8	Site 8	8,055	Multiple				4	22
8	009171032	1,859	R2					
8	009171033	2,032	R2					
8	009171034	3,718	R2					
8	009171035	446	NC					
9	001042008	3,319	DW				2	26
10	001175001	13,166	DT				20	66
11	001251006	11,217	DT				6	23
12	004151022	9,039	DW				10	48
13	004152002	5,772	DW				7	53
14	004152003	6,452	DW				7	47
15	002031007	3,299	GN-CZ				3	40

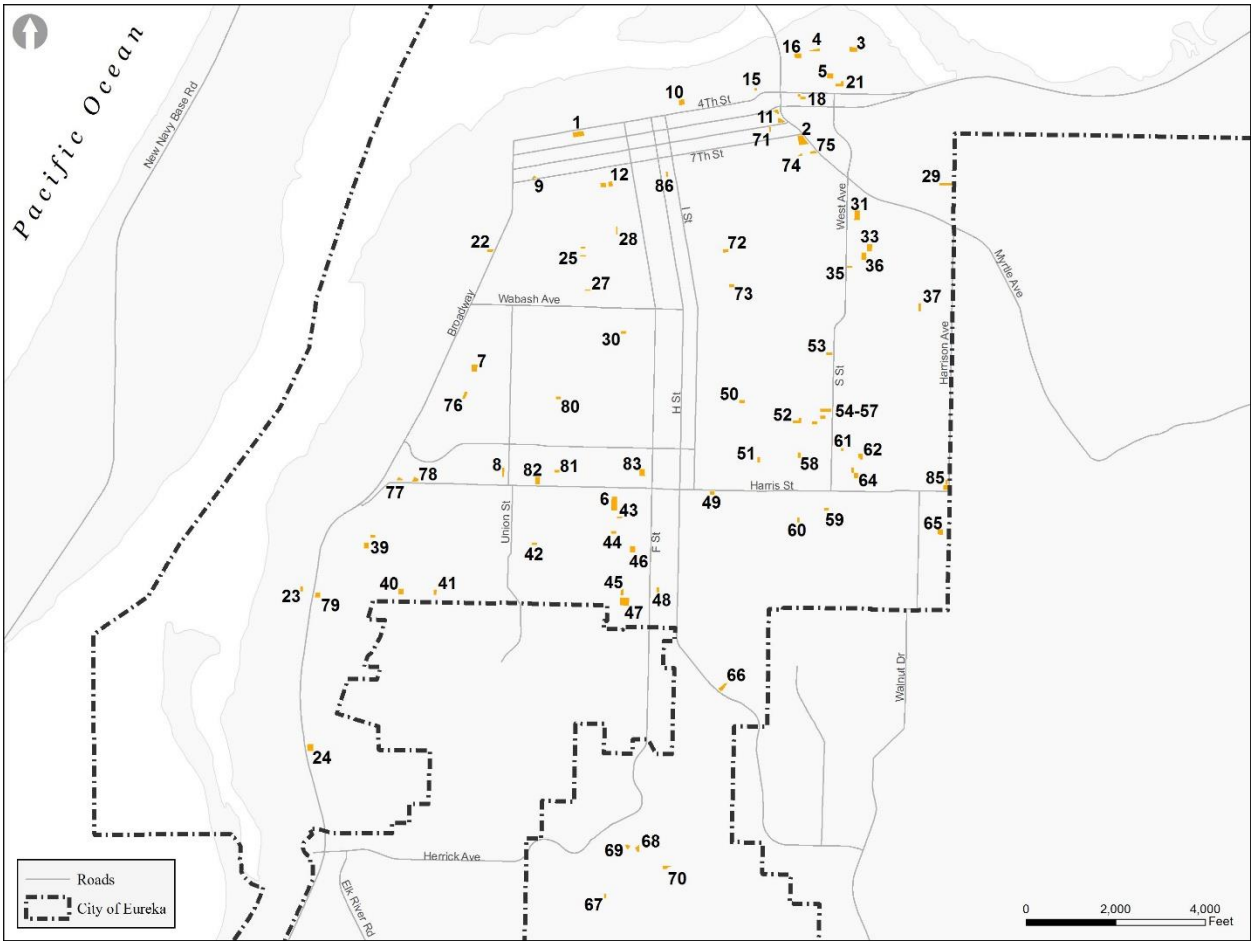
Site	APN	Area (sf)	Zoning	VLI	LI	MI	AMI	DU/AC
16	002053001	13,192	BD-CZ				10	33
17	002071002	3,299	GN-CZ				3	40
18	002071004	7,199	GN-CZ				7	42
19	002076004	7,137	GN-CZ				6	37
20	002101002	6,598	GN-CZ				6	40
21	002101010	6,654	GN-CZ				6	39
22	003141001	7,790	CS-CZ				8	45
23	007094002	6,637	CS-CZ				6	39
24	302171041	19,863	CS-CZ				19	42
25	004111007	4,722	R3				5	46
26	004114005	3,549	R3				2	25
27	004131003	3,959	R3				2	22
28	004163006	5,116	R3				2	17
29	002181005	16,037	R1-CZ			1	1	5
30	004204005	6,543	R1			1	1	13
31	006121002	22,099	R1			4	4	16
32	006121003	3,597	R1				1	12
33	006132022	9,894	R1			1	1	17
34	006132023	6,976	R1			1	1	16
35	006141018	3,917	R1				1	11
36	006142011	18,226	R1			3	3	34
37	006274014	8,491	R1			1	1	10
38	008121012	6,352	R1			1	1	29
39	008131002	12,230	R1				1	4
40	008151014	11,896	R1			2	2	15
41	008221026	7,087	R1				2	12
42	009261025	5,643	R1			1	1	15
43	010091008	3,373	R1				1	13
44	010091017	5,993	R1			1	1	15
45	010121013	7,981	R1			1	1	20
46	010281034	16,290	R1			1	1	10
47	010293023	34,458	R1			4	4	10
48	011111002	6,498	R1			1	1	13

Site	APN	Area (sf)	Zoning	VLI	LI	MI	AMI	DU/AC
49	011186001	7,871	R1			1	1	11
50	012036009	7,366	R1			1	1	13
51	012056008	6,679	R1			1	1	13
52	012131009	13,262	R1			1	1	8
53	012141031	7,739	R1			1	1	20
54	012162006	8,014	R1			1	1	11
55	012162008	8,790	R1			1	1	10
56	012162003	8,788	R1			1	1	10
57	012171009	7,194	R1			1	1	15
58	012191007	6,880	R1			1	1	13
59	012213010	6,368	R1			1	1	14
60	012221015	5,288	R1			1	1	16
61	013044006	3,611	R1				1	12
62	013053006	12,075	R1				1	7
63	013055002	6,969	R1				1	6
64	013055005	10,437	R1			1	1	8
65	013201073	14,039	R1			1	1	6
66	018152019	14,323	R1			1	1	6
67	301031030	5,265	R1			1	1	17
68	301231021	10,347	R1			1	1	10
69	301231032	7,164	R1			1	1	12
70	301281038	8,222	R1			1	1	11
71	001253003	4,066	R2				1	11
72	005104012	7,254	R2				3	18
73	005122004	7,528	R2			1	1	12
74	006011001	2,836	R2				2	31
75	006012001	6,550	R2			1	1	16
76	008022028	8,892	R2				3	15
77	008052011	9,224	R2				4	19
78	008053009	9,983	R2				4	17
79	008112028	12,288	R2				6	21
80	010033013	6,487	R2				3	20
81	010061017	5,940	R2				3	22

Site	APN	Area (sf)	Zoning	VLI	LI	MI	AMI	DU/AC
82	009242007	18,924	CN				20	46
83	010252022	12,830	HC				12	41
84	013182011	5,180	CN				3	25
85	013182027	10,465	CN				5	23
86	005012002	4,400	R3				4	42
		Totals		**85**	**0**	**50**	**298**	

Source: City of Eureka.

Figure 10 Vacant Sites



Source: City of Eureka.

Site 1 (Veteran's Site) This site is a 50-unit affordable homeless veteran housing development that currently under construction. These units will be deed-restricted Very Low Income. It's being included here because it received its entitlement and building permit during the current 6th Cycle projection period (12/31/2018-8/31/2027). The project received Design Review approval (entitlement) on 9/12/2018. The building permit was issued on 1/11/2019.

Site 2 (Seventh and Myrtle Site) This site is slated to host a 36-unit affordable housing development. The City Council approved the sale of the property to developer Danco Communities on 12/19/2017 after a competitive bid process. The project has not yet reached the entitlement or construction phase, though the contract has been awarded and there is every indication that the project will be built in the coming years. These units will be deed restricted Very Low Income.

Sites 3-85 (Various Vacant Sites) These sites are distributed throughout the city, both in multi-family residential/mixed-use zones and in the single-family zone (R1). For sites in the R1 zone, Above Moderate Income units are assumed to be single family homes and Moderate Income units are assumed to be ADUs. If there are multiple units listed on a site in the R1 zone, it means that the site is a candidate for a subdivision. In multi-family residential zones (e.g. R2 and R3) and in mixed-use zones (e.g. DT or NC) the densities are estimated at either 22 du/ac or 44 du/ac, densities that correspond to the medium and high-density residential zones. Sites located in mixed-use zones have been allocated units at 44 du/ac or less, equivalent to the high-density multi-family zone. The exact density can be found in the right-most column of **Table 54**. The physical site conditions are typically a grass or gravel lot. More detail on the constraints evaluated and the methodology can be found at the beginning of the Residential Sites Inventory section.

Methodology – Non-Vacant Sites

A site is considered non-vacant if it contains any permanent structure or existing land use capable of generating income for the property owner (e.g., parking). Uniquely, all sites listed are publicly-owned and are targeted for the development of affordable housing via Implementation Program IMP H-34. The majority (85 percent) are owned by the City of Eureka. See Implementation Program H-34 for a detailed account of the specific actions to be taken on the part of the City to facilitate the development of these sites (**Table 55** and **Figure 11**).

Table 55 Non-Vacant Sites

Site	APN	Area (sf)	Zoning	Notes	VLI	LI	MI	AMI	DUAC
1	001094002	12,724	DT	City Parking Lot - 3rd & G (Old City Hall)	5	5			34
2	006181001	18,286	NC	City Parking Lot - Sunny & Myrtle	15	5			48
3	001155005	14,668	DT	City Parking Lot - 8th & G	15	5			59
4	Site 4	13,200	DT	City Parking Lot - 6th & M	15	5			66
4	001233007	6,600	DT	City Parking Lot - 6th & M					
4	001233006	6,600	DT	City Parking Lot - 6th & M					
5	001192001	13,200	DT	City Hall Parking Lot - 5th Street	15	5			66
6	001192004	13,200	DT	City Hall Parking Lot - 6th Street	15	5			66
7	Site 7	12,600	DT	City Parking Lot - 3rd and E (Visitor's Center)	10	10			69
7	001096003	6,000	DT	City Parking Lot - 3rd and E (Visitor's Center)					

Site	APN	Area (sf)	Zoning	Notes	VLI	LI	MI	AMI	DUAC
7	001096002	6,600	DT	City Parking Lot - 3rd and E (Visitor's Center)					
8	001103003	13,200	DW	City Parking Lot - 5th & D (Next to Loyd Building)	10	10			66
9	001142007	17,600	DT	City Parking Lot - 4th & G (Across from Arkley Ctr.)	15	10			62
10	001142005	13,200	DT	City Parking Lot - 5th & H (Next to Banana Hut)	15	5			66
11	006021006	19,792	P	Portion of Cooper Gulch Park	15	5			44
12	008112031	7,300	R2	Broadway & McCullen (DOT surplus)	7				42
13	Site 13	111,308	P	County Owned - Sherriff's Woodlot	40	40			31
13	013101006	27,933	P	County Owned - Sherriff's Woodlot					
13	013111003	83,375	P	County Owned - Sherriff's Woodlot					
				Totals	192	110			

Source: City of Eureka

Figure 11 Non-Vacant Sites

Source: City of Eureka.

Site 1: Old City Hall Apartment Rendering

Site 1: Old City Hall Apartments - Sample Upper Floor Layout

Site 1 (City Parking Lot – Old City Hall) This site formerly contained Eureka's original City Hall, which was tragically lost to an earthquake in the early 20th century. Following its destruction, a City-owned parking lot was installed on the site. The parking lot currently serves workers, visitors, and residents in the downtown area. The site is centrally located, within comfortable walking distance of the waterfront boardwalk and the historic Old Town. The Downtown area contains the highest job density in a five-county region, with thousands of white-collar and government jobs. The recently constructed Eureka Waterfront Trail runs only two blocks away, and provides a dedicated non-motorized multi-user path connecting all of the city's waterfront. Within the next two years the Eureka Waterfront Trail will connect to the Bay Trail, which will create a link between Eureka and Arcata. According to parking lot usage data collected in the summer of 2019, the utilization rate of the parking lot is 81 percent. For this reason, City-led explorations of development potential have assumed that ground level would be maintained for public use and that housing development would be limited to upper stories. However, it may be possible to eliminate the public parking on this site (thereby increasing the feasibility of the development) if the surrounding area can be demonstrated to have sufficient excess capacity or if parking management strategies can be employed to mitigate the impacts. The City of Eureka hired a local architect to explore dense, multi-story affordable-by-design housing on the site in early 2018. The City sought to confirm the ability of the site to physically accommodate typical multi-story residential infill development, providing additional confidence in the development potential of the site. The architect-created transit-oriented concepts indicate that affordable-by-design concepts (approx. 400-square-foot units) are realistic for the site. The two concepts explored were a 4-story 45 micro unit development and a 5-story 60 micro unit development. This is equivalent to 155 du/ac and 206 du/ac, respectively. Target density is 45 units to 60 units based on the concepts. This is equivalent to 155 du/ac and 206 du/ac, respectively. No dedicated parking would be provided for residents, instead the site would likely contain a high-quality bike garage and each resident would potentially be provided with an unlimited annual bus pass. The county's central transit hub is located only 300 feet from the site. Density has been estimated at an intentionally conservative 10 units, or 34 du/ac, in order to provide the greatest degree of design flexibility, (and therefore likely developer interest) for this initial parking-lot-to-housing-development. This site will be targeted for development via Implementation Program H-34.

Site 2 (City Parking Lot – Sunny & Myrtle) This site contains a severely under-utilized 18-space parking lot. It has frontage on Myrtle Avenue, and is very well served by transit. Located on the green and purple bus lines, there is large bus shelter immediately on site. Surrounding land uses include neighborhood commercial uses (hair salon, restaurants, gas station, etc.) and high density multifamily residential uses (quadplexes, eight-plexes, etc.). The site is also located along a proposed spur to the Waterfront/Bay trail. When the spur is completed, it would provide residents with direct trail access to the vast majority of jobs and services both in Eureka and Arcata. Parking lot utilization data for this site is not available because the City does not collect data on account of the extremely low usage rate. Density has been estimated at 20 units, or 44 du/ac. This is consistent with the adjacent R3 zone. This site will be targeted for development via Implementation Program H-34.

Site 3 (City Parking Lot - Eighth and G) This site is an under-utilized City-owned parking lot located on the border of the downtown and high-density residential zones. According to parking lot usage data collected in the summer of 2019, the utilization rate of the parking lot is 11 percent. The site was selected because of its location on the edge of downtown, which puts many jobs and resources within comfortable walking distance. Also because of its low utilization rate, it may be suitable for a development scenario where the ground level is not used to preserve public parking. Density has been estimated at 20 units, or 66 du/ac. This site will be targeted for development via Implementation Program H-34.

Site 4 (6th and M Parking Lot) This site is an under-utilized City-owned parking lot located on the border of the downtown and high-density residential zones. The site was selected because of its location on the

edge of downtown, which puts many jobs and resources within comfortable walking distance. Also because of its low utilization rate, it may be suitable for a development scenario where the ground level is not used to preserve public parking. Density has been estimated at 20 units, or 66 du/ac. This site will be targeted for development via Implementation Program H-34.

Site 5 (City Hall Parking Lot – 5th Street) This site is a parking lot located adjacent to Eureka City Hall that provides managerial employee parking. It is located near the heart of downtown, and as such provides excellent access to jobs, services, and transit. This site is proposed to be developed such that the ground level parking will be maintained for City employees. Density has been estimated at 20 units, or 66 du/ac. This site will be targeted for development via Implementation Program H-34.

Site 6 (City Hall Parking Lot – 6th Street) This site is a parking lot located adjacent to Eureka City Hall that provides employee parking. It is surrounded by job, transit, and entertainment rich areas making it an ideal candidate for low-carbon living. This site is proposed to be developed such that the ground level parking will be maintained for City employees. Density has been estimated at 20 units, or 66 du/ac. This site will be targeted for development via Implementation Program H-34.

Site 7 (3rd and E Parking Lot) This site is a parking lot located in the heart of Old Town, near the Visitor's Center and the Clark Plaza. Its located puts it in easy walking distance of numerous jobs, services (including two grocery stores), and the recreational opportunities provided by the waterfront. An added advantage of this site is its proximity to recurring cultural events such as Friday Night Market and Arts Alive. Because of the importance of visitor parking, the public parking is proposed to be maintained on the ground level. Density has been estimated at 20 units, or 69 du/ac. This site will be targeted for development via Implementation Program H-34.

Site 8 (5th and D Parking Lot) This site is a parking lot located in the Downtown West, a mixed-use zone very similar to downtown. Similar to the other sites, it is close to a wide variety of jobs and services. This site is proposed to be developed such that the ground level parking will likely be maintained for public parking. Density has been estimated at 20 units, or 66 du/ac. This site will be targeted for development via Implementation Program H-34.

Site 9 (4th and G Parking Lot) This site is a parking lot located in the Downtown area just west of the Arkely Center for the Performing Arts. It is an excellent location for housing given it proximity to a wide range of jobs and amenities. Because this public parking lot is heavily used, this site is proposed to be developed such that the ground level parking will be maintained for public parking. Density has been estimated at 20 units, or 62 du/ac. This site will be targeted for development via Implementation Program H-34.

Site 10 (5th and H Parking Lot) This site is a parking lot located on the same block as Site 9 and is very similar, albeit slightly smaller in area. Because this public parking lot is heavily used, this site is proposed to be developed such that the ground level parking will be maintained for public parking. Density has been estimated at 20 units, or 66 du/ac. This site will be targeted for development via Implementation Program H-34.

Site 11 (Cooper Gulch) This is a peripheral portion of an existing City park. Located at the northwest corner of Cooper Gulch Park, it is a peninsula of land located between the cemetery, Cooper Gulch Recreation Center, and a Montessori school. This portion of the park currently contains one "hole" on the disc golf course. This site is well suited to affordable family housing because it is located near the transit rich Myrtle Avenue corridor, the job rich commercial areas located immediately to the north and west, and the park amenities such as fields, playgrounds, and a City-run after school program. Density has been

estimated 20 units or 44 du/ac, which is equivalent to the high-density multi-family zone. One additional advantage of this site is that the parking needed to serve the housing may be shared with the existing recreation center/park parking lot. This site will be targeted for development via Implementation Program H-34.

Site 12 (Caltrans Surplus) This site was identified by the California Department of General Services as surplus Caltrans property suited to the development of affordable housing following Governor Newsom's Executive Order N-06-19 in April 2019. The City sees this site as well-suited to the development of permanent supportive housing for formerly homeless persons. It is located near transit, services, and has the potential to be combined with an adjacent vacant to increase the viability of the site (which is currently for sale). This site will be targeted for development via Implementation Program H-34.

Site 13 (Sherriff's Wood Lot) This site is owned by the County of Humboldt and contains a firewood production operation, a legal non-conforming use for the Public Facilities Zone. The firewood production operation is a component of the Sherriff's Work Alternative Program (SWAP), which allows prisoners an alternative to incarceration. The industrial operation generates heavy truck traffic as logs are brought to the site and as processed firewood is taken from the site. No structures are present on site to support the firewood operation; all activities take place in the open. The use generates noise, vibration, and dust as the wood is processed. The site sits immediately adjacent to (and upwind of) the concentration of medical and residential uses found in the Hospital Medical (HM) zone. This site represents an excellent opportunity for affordable housing because of its close proximity to a middle school, medical-related jobs, city parks, a grocery store, a pharmacy, restaurants, and public transit available on Harrison Avenue. The site is also well served by utilities. The City will work with the County government to relocate the firewood processing operation and encourage it to release the site for affordable housing development to an affordable housing developer. Density has been estimated at a conservative 28 du/ac, which would result in 70 units. For comparison, this is slightly higher than the medium density residential zone (22 du/ac) but lower than the high-density residential zone (44 du/ac). This site will be targeted for development via Implementation Program H-34.

Past Accomplishments

2014-2019 Implementation Programs	Description	Progress and Continued Appropriateness	Continued in 2019-2027 Housing Element
Program 1 - Update Zoning Ordinance	Review Zoning Code annually to ensure that regulations are aligned with community goals.	The zoning code was comprehensively updated in May, 2019 to ensure consistency with the 2040 General Plan (adopted October, 2018).	IMP H-1, IMP H-3, IMP H-6
Program 2 - Vacant Land Inventory	Maintain inventory of vacant publicly-owned land. Promote development of these parcels when possible.	The City has maintained a list of vacant publicly-owned land and initiated the sale of properties for the development of low-income housing.	IMP H-9, IMP H-11
Program 3 - Annexations for Residential Development	Evaluate the feasibility and desirability of annexing surrounding land for residential and mixed-use development.	A comprehensive review of the annexation potential of Cutten, Mytletown, and other areas was completed in conjunction with the General Plan Update in 2016. Analysis found that each annexation would result in greater service costs than could be recouped by the anticipated additional revenue. The City Council declined to pursue annexation during the General Plan Update process for this reason.	Complete, not continued.

2014-2019 Implementation Programs	Description	Progress and Continued Appropriateness	Continued in 2019-2027 Housing Element
Program 4 - Secondary Dwelling Units	Ensure consistency between State ADU law and Zoning Code. Promote and track the creation of ADUs.	The ADU regulations were updated to maintain consistency with state law. A multi-jurisdictional "ADU Fair" was held in September 2018 to promote ADU creation. The number of newly created ADUs were tracked and reported to HCD via the Annual Progress Report.	IMP H-12
Program 5 - Conversion of Underutilized Buildings	Maintain inventory of underutilized buildings and actively promote their conversion to residential uses, utilizing funding as appropriate.	The City has continued to maintain and monitor the inventory of existing and underutilized buildings prepared during the 2009-14 Housing Element planning period. Development Services staff met with various property owners on an informal, ad-hoc basis to encourage conversion of underutilized space. An Old Town/Downtown vacancy rate analysis was completed in 2016 to better understand the area's existing vacancies, and potential locations for housing creation.	IMP H-13
Program 6 - Motel Conversions	Create list of motels that are being used as permanent residences, promote their conversion to housing if requested by the property owner.	The Serenity Inn continues to provide transitional housing as well as short term accommodations without supportive services. City staff evaluated the potential to convert the Budget Inn to housing in 2017, though it is currently being rehabilitated for continued lodging uses.	IMP H-15
Program 7 - Partnerships with Subsidized Housing Developers	Establish and maintain productive relationships with affordable housing developers	The City continues to work closely with local affordable housing developers, selling unneeded City-owned properties and partnering in the funding of multiple affordable housing developments when funds are available. The City partnered with the developer of the 50-unit senior affordable housing facility known as "The Lodge at Eureka," the sale of City-owned property and proposed development of the 7th and Myrtle Avenue Project as 36-unit senior affordable housing facility, and assisted with planning for the 4th Street 50-unit Veterans/Homeless facility.	IMP H-16, IMP H-18
Program 8 - Lot Consolidation	Analyze existing undersized parcels and encourage the consolidation of small parcels to improve viability of larger developments.	The City did not review undersized parcels or analyze the potential benefits of encouraging consolidation. After careful analysis, it was determined that small lots can often be developed satisfactorily by modifying restrictive development standards, such as reducing or eliminating required off-street parking. The City's updated zoning code eliminates or reduces a number of previous standards to support housing development.	Not completed, not continued.
Program 9 - Water and Sewer Provider Coordination	Deliver 2014-2019 Housing Element to all public and private agencies that provide water or sewer services to properties within the city, as required by state statute	The Housing Element was distributed as required by law.	Complete, continued as a standard departmental policy to comply

2014-2019 Implementation Programs	Description	Progress and Continued Appropriateness	Continued in 2019-2027 Housing Element
			with all state and federal laws.
Program 10 - Flood Management	Revise Conservation and Safety Elements of the General Plan when the General Plan is updated, as required by state statute.	The Conservation and Safety Elements were revised during the 2040 Eureka General Plan Update which was adopted in October 2018.	Complete, continued as a standard departmental policy to comply with all state and federal laws.
Program 11 - Housing for Extremely Low-Income Households	Encourage development of housing units for households earning 30 percent or less of Median Family Income, specifically by single room occupancies (SROs) and transitional housing. Target of 20 housing units for extremely low-income households.	The City clarified regulations to allow SROs and permits transitional housing consistent with state definitions and regulatory requirements. Between 2014 and 2019, 38 units for extremely low-income households were created.	IMP H-16, IMP H-18
Program 12 - Emergency Shelters	Amend zoning code define transitional and supportive housing as a residential use. Allow emergency shelters as a principally permitted use in the Service Commercial (CS) zone and monitor inventory of emergency shelter sites.	The 2019 Zoning Code Update defines transitional and supportive housing as residential uses, and allow emergency shelters as a principally permitted use in the Service Commercial zone districts.	Complete, continued as a standard departmental policy to comply with all state and federal laws.
Program 13 - Homeless Assistance	Keep a homeless liaison to provide information to individuals on services and shelters in the area. Continue to participate in the Continuum of Care efforts, meet with representatives on an annual basis to discuss locating housing in the city and continue to support the Multiple Assistance Center.	The Focus Strategies Homeless Implementation Program was adopted by the County/City in January 2016. The Implementation Plan consisted of: Convening a County-wide Homeless Leadership Working Group, and MIST (Mobile Intervention Services Team consisting of EPD officers and DHHS Counselors) to work on the streets directly with those who are homeless; training community-wide for Housing First, 30/60 Campaign (Housing 30 People in 60 Days); a holding Housing First Summit; hiring a Homeless Liaison; funding AmeriCorps Workers and Rental Subsidies; developing strategies for removal of barriers to housing and standardized tools for identifying homeless with the highest needs; creating a list of the top 30-50 individuals with the highest need to be housed and housing them; tracking housing outcomes and returns to homelessness with HMIS (Homeless Management Information System) data system; assisting Humboldt Area Foundation organize meetings for the funding alignment work group to privately raise funds; and holding a Landlord Luncheon to recruit and recognize community landlords.	IMP H-18, IMP H-27, IMP H-28
Program 14 - Senior Housing	Continue to work with housing developers to leverage outside funding sources and provide outside resources such as permitting assistance and land	The City partially funded "The Lodge at Eureka", a 50-unit senior affordable housing development completed in 2015 and is in a Disposition and Development Agreement with a	IMP H-16, IMP H-18

2014-2019 Implementation Programs	Description	Progress and Continued Appropriateness	Continued in 2019-2027 Housing Element
	resources, when feasible. Target to create one senior housing facility between 2014 and 2019. Amend zoning code to improve ability to create senior housing.	developer for an additional 36-units of affordable senior housing on a City-owned site at 7th and Myrtle to begin construction in early 2020. The 2019 Zoning Code Update also reduces barriers to ADU creation and allows for parking reductions, both of which help facilitate the creation of senior housing.	
Program 15 - Housing for Developmentally Disabled Persons	City will seek state and federal monies in support of housing construction and rehabilitation targeted for persons with disabilities. The City will provide regulatory incentives such as efficient permit processing and fee waivers and reach out to developers of supportive housing. As housing is developed, Eureka will work with RCEA to implement an outreach effort to inform people in need of this type of housing of its availability.	The City continues to seek funding for housing developments that serve developmentally disabled persons; however, no developments of this type were constructed/rehabilitated in Eureka between 2014-2019. Regulatory incentives were not created. An outreach/informational program was not co-created by the City and RCEA.	IMP H-16, IMP H-18
Program 16 - Innovative Housing Programs	City will investigate zoning tools to encourage housing types such as co-housing, shared housing, intergenerational housing, community care facilities, supportive care facilities, supportive housing, and assisted living for seniors and the disabled.	The 2019 Zoning Code Update clarifies the permissibility of the listed housing types and incorporates numerous provisions designed to facilitate their creation. Examples include a local density bonus, parking reductions, and Design Review streamlining.	IMP H-1, IMP H13
Program 17 - Units for Large Households	City will provide regulatory incentives to developers to encourage the inclusion of units with three or more bedrooms to accommodate low-income large family households. When a project is approved and utilizes local funds for subsidized family housing, when appropriate, the City will ensure that at least 25 percent of the units in the project have three or more bedrooms to accommodate large families. Target to great 5 large units between 2014 and 2019.	The 2019 Zoning Code update reduces barriers to create large units by calculating parking on a per-unit basis instead of on a per-bedroom basis, in addition to allowing parking alternatives and reductions. The City has not required the creation of large units as a condition of funding, and zero large rental units were created between 2014 and 2019.	IMP H-16, IMP H-18
Program 18 - Section 8 Rental Assistance	The City will provide referral services and basic qualification services to prospective Housing Choice Voucher Tenants and encourage property owners to participate in the program.	The City continues to provide these services.	IMP H-29
Program 19 - Homeless Strategy	The City will pursue a strategy of short, medium, and long-term actions including targeted outreach, prioritizing high-barrier homeless people, exploring and pursuing funding opportunities, Homeless Management Information System (HMIS), and continued collaboration with the	The Focus Strategies Implementation Plan was adopted by Humboldt County and the City of Eureka in January 2016. MIST (Mobile Intervention Services Team) provided community-wide training on Housing First. A Housing First Summit and Housing 30 People in 60 Days using Housing First (30/60 Campaign) took place in August 2016. The Homeless Liaison was hired in	IMP H-27

2014-2019 Implementation Programs	Description	Progress and Continued Appropriateness	Continued in 2019-2027 Housing Element
	Humboldt County Housing and Homeless Coalition (HHHC).	December 2016. Funding for AmeriCorps workers and rental subsidies were put in place. Strategies for removal of barriers to housing and standardized tools for identifying 30-50 individuals with the highest needs to be housed. Housing outcomes and returns to homelessness were tracked. The Humboldt Area Foundation organized meetings for the funding alignment work group to privately raise funds. Humboldt County organized a Landlord Luncheon to recruit and recognize community landlords in September 2018.	
Program 20 - Code Enforcement	City will continue to pursue code enforcement actions to preserve housing stock, expanding efforts when possible. Eligible property owners will be offered an opportunity to correct code violations through financial assistance.	The City continues to pursue code enforcement efforts to bring non-compliant properties into compliance. Two full-time code enforcement officers have been hired since 2017.	IMP H-20, IMP H-21
Program 21 - Small Multi-Family Rental Rehabilitation/Construction	Continue to operate this program that provides small loans for owners to complete health and safety repairs. Target of 2 rehabilitation projects between 2014 and 2019.	This program provided two loans between 2014 and 2019 providing 14 units of deed restricted affordable low-income housing. Unfortunately, due to a lack of funding sources this program was suspended. The City will monitor opportunities for reinstatement.	IMP H-25
Program 22 - Owner-Occupied Rehabilitation Program	Continue to operate this program that provides loans of up to $100,000 to complete health and safety repairs. Target of 30 loans between 2014 and 2019.	This program provided one loan between 2014 and 2019. Unfortunately, due to stricter eligibility requirements and HCD guideline challenges this program was suspended. The City will monitor opportunities for reinstatement.	IMP H-25
Program 23 - Wheelchair Ramp Grant Program	Continue to provide grants of up to $2,500 for eligible households to install wheelchair ramps.	This program provided no grants between 2014 and 2019 due to a lack of funding. The City intends to monitor opportunities for reinstatement.	IMP H-25
Program 24 - Graffiti Clean-up Kit Program	Continue to fund and operate this program that reduces the cost of graffiti removal for residential property owners.	This program provided no grants for graffiti removal between 2014 and 2019. Rather, a similar program, operated by the Eureka Police Department has become the main government-funded graffiti removal program. Also, local paint stores often provide free painting materials for removal of graffiti directly to the public.	IMP H-25
Program 25 - Senior Home Repair Grant Program	Continue to fund this program that provides small home repair grants of up to $300 per qualified home improvement project for low income seniors to remain in their homes. The program is administered by the Humboldt Senior Resource Center.	This long-term program is frequently used and draws from an annual fund of $5,000.	IMP H-25
Program 26 - Dumpster Grant Program	Continue to administer this program which provides up to 20 dumpsters for homeowner and code enforcement cleanup efforts.	This program is frequently used, with all 20 dumpster vouchers being issued annually. The program continues to have a strong positive effect on neighborhoods.	IMP H-25

2014-2019 Implementation Programs	Description	Progress and Continued Appropriateness	Continued in 2019-2027 Housing Element
	The dumpsters are provider free of charge by Recology.		
Program 27 - Monitor and Preserve At-Risk Units	Annually update and maintain the List of Affordable Housing at Risk of Converting to Market Rate housing and update on City website.	The City continues to maintain an updated list of affordable housing at risk of being converted to market-rate housing.	IMP H-17
Program 28 - Purchase Housing Covenants	Investigate the feasibility of purchasing 55-year affordability covenants, if and when funding is identified.	The City examined numerous potential funding sources to purchase affordability covenants, but was unable to acquire the necessary funds.	IMP H-16, IMP H-18
Program 29 - Mobile Home and Manufactured Housing	Consider, as a part of the Zoning Code update, a rent control ordinance or similar measure that would restrict the conversion of mobile home parks to other uses.	The City evaluated regulatory measures to restrict the conversion of mobile home parks to other uses as a part of the Zoning Code Update. The City decided not to pursue such a measure because conversion pressure is low and is expected to remain low in the City's two mobile home parks. The City's mobile home and manufactured housing regulations are consistent with state law.	Completed, not continued.
Program 30 - Residential Development Standards	Review Zoning Code annually to identify standards that may constrain development of affordable housing and housing for special groups such as disabled individuals.	The comprehensive 2019 Zoning Code Update process involved the careful review of all development standards in order to remove barriers that may constrain housing creation and to ensure consistency with all state and federal laws.	IMP H-1
Program 31 - Density Bonus Incentives and Concessions	Amend zoning code to codify State Density Bonus Law.	The 2019 Zoning Code was updated and clearly indicates the potential incentives and concessions made available by the Density Bonus Law.	Completed, not continued.
Program 32 - Reduced or Modified Parking Requirements	Explore amending the Zoning Code to allow shared parking, reductions for affordable housing, or reductions for developments near transit.	The comprehensive 2019 Zoning Code Update includes parking reductions or exemptions for: shared parking, affordable housing, and housing built near transit.	IMP H-1
Program 33 - Efficient Application Review	Regularly review permit processing times, evaluate ways to improve processing times, and allow for expedited permitting of affordable housing developments.	The Development Services Department reviews permit processing times weekly and works on an ongoing basis to streamline the review process. An expedited review process was not established for affordable housing developments.	IMP H-5
Program 34 - First-Time Homebuyer Program (FTHB)	Investigate new funding sources and administer this program if and when funding becomes available.	The City explored alternative funding sources but was unable to acquire funding sufficient to continue this program without program guideline changes. Local housing costs are high and program funding allowances are low.	IMP H-25
Program 35 - Reasonable Accommodation	Evaluate constraints on the development, rehabilitation, and conservation of housing units intended for persons with disabilities.	The comprehensive 2019 Zoning Code Update process involved the careful review of all development standards, including those that may unduly constrain the development of housing for persons with disabilities. Both the previous and the updated Zoning Code contain provisions for reasonable accommodation to relax physical	Completed, not continued.

2014-2019 Implementation Programs	Description	Progress and Continued Appropriateness	Continued in 2019-2027 Housing Element
		development standards to accommodate the housing needs of disabled persons. The application fee is waived for a request for reasonable accommodation.	
Program 36 - Mediation and Fair Housing Programs	Continue to provide residents with fair housing services, refer fair housing complaints to the appropriate entity, and provide printed materials for distribution throughout the community.	The City has provided all listed services throughout the planning period, and continues to do so.	IMP H-30
Program 37 - Energy Efficiency	Continue to review building plans for compliance with state energy efficiency standards. Encourage residential developers to exceed the provisions of Title 24. Study the feasibility of raising energy efficiency standards for publicly-funded development, requiring the use of Energy Star appliances. Encourage passive design resources upgraded insulation, and energy efficient lighting.	The City has continued to review building plans for compliance with state energy efficiency standards and promoted energy efficient design. The City has not required the use of Energy Star appliances in publicly-funded developments.	IMP H-23
Program 38 - Weatherization Programs	Distribute information about weatherization programs provided by local organizations.	The City continues to provide this information.	IMP H-23
Program 39 - Green Building Techniques	Revise the Building Code to allow the use of alternative building methods deemed feasible and appropriate, beyond the minimum requirements of Title 24.	The Building Department evaluated the feasibility and appropriateness of establishing requirements in excess of those contained in Title 24 and determined that it was not feasible and/or appropriate to do so.	Completed, not continued.
Program 40 - Staff Training on Green Building Practices	Building and Planning staff will attend trainings to maintain awareness of green building practices and incorporate best practices into local codes	Building and Planning staff regularly attend~~ed~~ trainings on green building practices and have periodically updated local codes as appropriate.	IMP H-23

Letter of Support for Housing Element/IMP H-34

DANCO

THE DANCO GROUP OF COMPANIES

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October 29, 2019

RE: Eureka Housing Element Support

To Whom It May Concern,

I am writing this letter to lend my support and to add credibility to the proposed actions contained in Implementation Program H-34 (Affordable Housing on Publicly-Owned Properties) of the 2019-2027 draft Eureka Housing Element. I have reviewed the sites and confirm that the specified minimum densities, affordability levels, and floor area ratios are realistic in our local development context. If these sites were released for the development of housing as proposed, Danco Communities would very likely respond to the Request for Proposals, and if selected, develop the sites.

Danco has been developing projects in Humboldt County since 1986 and has a proven record of developing deed-restricted affordable housing within Eureka. Notable recent projects in Eureka include: The Lodge (49 units of senior affordable housing in 2017), Eureka Homeless & Veterans Housing Development (50 units of permanent supportive housing, currently under construction), and the 7th & Myrtle Apartments (36 units of senior affordable housing, currently in final stages of funding).

The Eureka Homeless & Veterans Housing Project in particular mirrors the proposed developments on Sites 1-10 in that it is a multi-story building located in downtown Eureka. The development under construction has a floor area ratio (FAR) of 2.0 and a density of 85 du/ac, which is comparable to the proposed downtown development sites. I understand that ground-level public parking may or may not need to be maintained for each proposed development and believe that the sites are developable under either scenario.

Sincerely,

Chris Dart
Danco Communities

Summary of Housing Workshop Results

(Attached as separate document)

Public Comment Matrix

Updated 11/04/19

Comment	Staff Response	Recommended Action
Midge Catchling, Citizen		
1 - Supports draft Housing Element content and thinks that it matches what was presented/discussed at the Housing Workshop	Noted	No action
Colin Fiske, Coalition for Responsible Transportation Priorities		
1 - Requested that language be added to promote housing co-ops.	Supportive	Incorporate
Aisha Cissna, Next Generation Eureka		
1 - Broadly supports draft Housing Element content	Noted	No action
2 - Request clarification on the difference between deed-restricted affordable housing and affordable-by-design house. Requests additional explanation regarding the focus on affordable-by-design.	To be provided in presentation	No action
3 - Requests revisions to Policy H-7.3 such that that it would call for additional resources to fight homelessness and not to balance distribution of resources.	This policy is focused specifically on avoiding an over concentration of low income and homelessness resources in Eureka. It appears that the commenter's interest in served in H-7.2	Discuss at study session
4 - Requests that workshops be held to generate ideas for pro-housing zoning code revisions.	Supportive	Revision made. One annual community workshop.
5 - Request bibliography	Citations included in text, as is typical in Housing Elements. Staff is happy to discuss answer questions.	No action.
6 - Requests modification to IMP H-15 and H-13 to articulate a more active City role	IMP H-13 relates to Tiny House Building code, appears to be not applicable. IMP H-15 Motel Conversions provides clear actions such as an annual report and contact with owners every 3 years.	No action.
Leslie Castellano, Eureka City Council Person		
1 - Supports Policy H-1.21 illegal unit amnesty initiative	Noted	No action
2 - Supports H-2.2 Complementary Partnership with Nearby Jurisdictions	Noted	No action

3 - Supports H-3.2 Condominium-related provisions	Noted	No action
4 - Supports H-3.4, curious about potential state lobbying efforts to increase funding.	Noted	No action
5 - Feels that H-3.5 Homeowner Education and Outreach is worded too vaguely.	Noted, will discuss	Discuss for possible inclusion
6 - Supports H-4.9 Property inspections, component of housing condition improvement work	Noted	No action
7 - Goal H-7 Would like to see language about providing services within housing intended for formerly homeless persons.	Supportive	Incorporate
8 - Policy 7.5 Add “other, related non-profits to list of providers”	Supportive	Incorporate
9 - IMP H-6, supportive though cautious of effects of changing Public Improvements Required regulations	Noted	No action
10 - Consider policies improve community amenities	Noted, will discuss	Discuss for possible inclusion
11 - IMP H-9 Residential Pre-permitting. Suggests that existing plans may be available.	Noted	No action
12 - IMP H-10 Supports downtown parking management plan.	Noted	No action
13 - IMP H-13 Supports tiny-house building code provisions	Noted	No action
14 - IMP H-15 Supports motel conversion to housing	Noted	No action
15 - IMP H-20 Supports provisions for exterior conditions to trigger code enforcement actions	Noted	No action
16 - IMP H-27 Supportive of updating Eureka’s homeless strategy	Noted	No action
17 - IMP H-30 Supportive of providing fair housing information	Noted	No action

Janelle Egger, Citizen		
1 - The 2018 Point in Town homeless person count data is used in the report instead of the more up-to-date 2019 data	Supportive	Revision made
2 - Questions accuracy of data in Table 18 Shelter Beds. Believes that a recent expansion of the Men's Shelter has increased the number of beds by 55.	Supportive	Correction made after call ERM.
3 - Concerned that because some potential locations for emergency shelters are located adjacent to each other, that this would preclude them from being used as emergency shelters. Table 19 in Technical Appendix.	To be addressed in presentation	No action
4 - Indicates that all sites listed as potential emergency shelter sites are located along Highway 101.	Noted	No action
5 - Indicates that one of the sites listed as a potential emergency shelter sites has been sold to be developed as a KFC restaurant	Supportive	Revision made
6 - Indicates that there has been a misrepresentation in the past accomplishments table (Program 12)	See comment 13, below.	No action
7 - Noted error in Table 44	Supportive	Correct error
8 - Recommended that exact number of transitional housing beds and shelter bed be double checked.	Supportive	Correction made
9 - Questions the legally of requiring transitional housing and rehab centers to be state licensed	IMP H-33 (newly added) requires that all local development code be reviewed to ensure consistency with state law.	Maintain IMP H-33 in draft HE
10 - Questions legality of large/small "Non-Medical Care Housing"	IMP H-33 (newly added) requires that all local development code be reviewed to ensure consistency with state law.	Maintain IMP H-33 in draft HE
11 - Requests that the term "prioritize resources" for	Supportive	Revision made

homelessness-related city actions.		
12 - Question about emergency shelters in the Coastal Zone and required LCP amendments.	Noted	Review Local Coastal Program update timeline.
13 - Requests stronger language in IMP H-27 Homeless Strategy	Noted, will discuss	Discuss for possible inclusion. Comment clarification needed.
14 - IMP 18 Requests that homeless populations be included under special needs populations	Supportive	Incorporate
15 – Proposed minor text edits to IMP H-27 Update Eureka's Homeless Strategy	Neutral	Discuss for possible inclusion. Comment clarification needed.
Gregory Holtz, Legal Services of Northern California (8/19/19 Letter)		
1 - Believes that the public participation process has been inadequate are requests that the City "withdraw its submission to HCD" to allow more time for public input.	Noted	Added 2 study sessions
2 - Expresses concerns that emergency shelter language in the former Zoning Code (since rescinded and replaced via the Zoning Code Update) is not consistent with state law.	Noted	Maintain IMP H-33 in draft HE
3 - Questions is methodology and appropriateness behind the non-site specific housing unit allocations.	Additional detail and rationale has been added at HCDs request. It is Staff's intent to provide rationale to the satisfaction of HCD.	NA following major strategy revisions
4 - Objects the 4th Street Veteran/Homeless facility being counted during the 2019-2027 Housing Element cycle.	This site has been included because it received its entitlement and building permit during the current 6th Cycle RHNA projection period (12/31/2018-8/31/2027). The project received Design Review approval (entitlement) on 9/12/2018. The building permit was issued on 1/11/2019.	Confirmed not a problem with HCD
5 - Feels that the density bonus language contained in the Zoning Code is not consistent with state law. Request that a program be added to address the density bonus.	This was not noted by HCD staff on the 8/14 initial draft response call. However, this can be verified via , IMP H-33 (newly added) requires that all local development code be reviewed to ensure consistency with state law	Maintain IMP H-33 in draft HE
Gregory Holtz, Legal Services of Northern California (9/9/19 Letter)		
1 – Believes that the requirement that Emergency	IMP H-33 (newly added) requires that all local development code be reviewed to	Maintain IMP H-33 in draft HE

Shelters be located at least 1,000' from schools is in conflict with Government Code 65583(a)(4)(A).	ensure consistency with state law. (Action 1)	
2 – Believes that VLI and LI have been inappropriately allocated on a non-site-specific basis.	Noted	NA following major strategy revisions
3 – Believes that the amount of evidence provided to support the estimates of ADU creation is insufficient.	Noted	NA following major strategy revisions
4 – Believes that the division or conversion of existing space housing creation strategy has not been adequately justified.	Staff receives many general inquiries from owners of multifamily or commercial properties about how to increase the number of units. It was often not possible in the past because of restrictive parking requirements. These restrictions have been removed, and should now allow for additional housing creation. IMP H-11 calls for the active recruitment of this sites.	NA following major strategy revisions
5 – Recommends allocating low income units to prime waterfront sites and creating inclusionary zoning	Noted	NA following major strategy revisions
6 – Recommends that IMP H-1 be expanded to include actual rent reporting and include additional (non specified) incentives to encourage development	Implementation Program H-1, H-2, and H-3 explain in great detail how the City will monitor housing creation annually and refine development regulations. Staff believes that the existing draft language is sufficient. The addition of annual rental rate surveys would require considerable staff time and is not recommended by staff without additional resources.	NA following major strategy revisions
7 – Believes that public participation has been deficient in the Housing Element adoption process	Noted	Added 2 study sessions
Maggie Kraft, Area 1 Agency on Aging		
Broadly supportive. Emphasizes importance of funding housing condition related efforts. Emphasizes importance of grants to help seniors maintain and refurbish homes.	IMP H-18 Housing for Special Needs Populations and IMP H-25 Various Housing Assistance Programs are intended to support these comments	No Action

DRAFT Addendum to
City of Eureka 2040 General Plan
Environmental Impact Report

2019-2027 Housing Element

November 2019

Lead Agency:
City of Eureka
531 K Street
Eureka, CA 95501

Prepared by:
PLANWEST PARTNERS, INC.

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APPENDICES

Appendix A City of Eureka 2019-2027 Housing Element

1.0 Introduction

1.1 PURPOSE

This document is an Addendum to the Environmental Impact Report for the City of Eureka 2040 General Plan, State Clearinghouse No. 2016102025, certified on October 15, 2018 (General Plan EIR). The project analyzed in the General Plan EIR and adopted by the City of Eureka is the City of Eureka 2040 General Plan (2018) (General Plan). The subject addressed by this addendum (hereinafter "Addendum") is the City's 2019-2027 Housing Element Updated (referred to interchangeably as "Housing Element" or "proposed project"), with the environmental analysis herein prepared pursuant to the provisions of the California Environmental Quality Act (CEQA) Guidelines Section 15164.

1.2 BACKGROUND

On October 15, 2018, the Eureka City Council adopted the project findings and Statement of Overriding Considerations, certified the Environmental Impact Report, and adopted the City of Eureka 2040 General Plan. The General Plan increases the development densities of the City and creates a framework to plan for and guide residential and non-residential growth and conservation in Eureka from now until 2040. This framework is based on a set of comprehensive goals and policies that expand existing land use patterns and focus new growth in undeveloped and underutilized areas of the City. Buildout of the General Plan land use designations will increase the City's residential development capacity by up to 1,886 dwelling units, which will house approximately 3,683 residents and provides for a total of up to 1.6 million square feet of non-residential uses.

The City's General Plan land use policies provide for strategic growth and change that preserve existing neighborhoods and target new development primarily to infill areas that are vacant or underutilized. The General Plan EIR assessed the environmental impacts that could result from implementation of the General Plan. As an element of the General plan, the Housing Element was prepared to be consistent with and conform to the General Plan.

Since the General Plan EIR was certified, amendments to the California Environmental Quality Act (CEQA) Guidelines have been adopted by the state, including changes to the Guidelines Appendix G (Environmental Checklist). The amendments to Appendix G include new discussion topics of vehicle miles traveled (VMT) for transportation issues (in response to SB 743), and the addition of wildfire, energy, and new, expanded, or relocated natural gas, electric power, and telecommunications facilities as separate topics to address.

1.3 ENVIRONMENTAL PROCEDURES

Pursuant to Section 21166 of CEQA and Section 15162 of the CEQA Guidelines, when an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR or negative declaration shall be prepared for the project unless the lead agency determines that one or more of the following conditions are met:

1. Substantial project changes are proposed that will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes would occur with respect to the circumstances under which the project is undertaken that require major revisions to the previous EIR or negative declaration due to the

involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

3. New information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified or the negative declaration was adopted shows any of the following:
    a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration.
    b. Significant effects previously examined will be substantially more severe than identified in the previous EIR.
    c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponent declines to adopt the mitigation measures or alternatives.
    d. Mitigation measures or alternatives that are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponent declines to adopt the mitigation measures or alternatives.

When an EIR has been certified for a project, no subsequent EIR is required if none of the conditions specified in Section 21166 are present (CEQA Guidelines Section 15162(a). An addendum is appropriate where some changes or additions to the previously certified EIR are necessary, but none of the conditions specified in Section 21166 have occurred (CEQA Guidelines Section 15164(a)).

The decision to prepare an Addendum is supported by Section 3, Environmental Analysis, which addresses each of the environmental issues included in the CEQA Guidelines, Appendix G. The Addendum reviews the proposed Housing Element and examines whether, as a result of any changes or new information, any new or worsened impacts could occur that were not identified in the certified EIR. In accordance with the CEQA Guidelines, the City has determined that an Addendum to the certified General Plan EIR is an appropriate environmental document for the proposed project.

2.0 Project Information

2.1 PROJECT LOCATION AND SETTING:

Regional Setting

The City of Eureka is located along the north coast of California in Humboldt County approximately 300 miles north of San Francisco and 100 miles south of the Oregon border (latitude 40º48'00"N, longitude 124º10'40"W). The City of Eureka is the county seat and the center of government and commerce for Humboldt County. Humboldt County is bordered on the west by the Pacific Ocean, on the north by Del Norte County, on the east by Siskiyou and Trinity counties, and on the south by Mendocino County. Humboldt County encompasses 2.3 million acres, 80 percent of which is rural forested area. The City of Eureka is situated on Humboldt Bay in the west portion of the County; it has an estimated population of around 27,000 which is approximately 20% of Humboldt County's total population of 135,490[1]. The City occupies approximately 10,500 acres making it the largest city along the 400 miles of highway between Santa Rosa, California and Medford, Oregon. See Figure 1, which illustrates Eureka's regional location.

Humboldt Bay is one of California's larger coastal estuaries and the only deep-water port between San Francisco and Coos Bay, Oregon. It is about 14 miles long and 4.5 miles wide at its widest point. Humboldt Bay is separated from the Pacific Ocean by long sand spits to the north and south of the entrance to the Bay. The City of Eureka sits on the eastern shore of Humboldt Bay at about its midway point. The Bay wraps around the City with the western and northern Eureka city limits extending into the Bay. The City's eastern and southern boundaries border unincorporated Humboldt County.

Local Setting

Initially founded in the spring of 1850, the City of Eureka was incorporated through a special act of the State Legislature on April 18, 1856. The community was reincorporated as a City on February 19, 1874, and received a charter on February 8, 1895. As the county seat for the 572 square mile Humboldt County, Eureka is the center of business and government; the major industries include agriculture, fishing, and tourism.

The City of Eureka is set up in a traditional grid street pattern with the numbered streets running east-west and the alphabetic named streets running north-south; First Street parallels Humboldt Bay along the northern waterfront. First Street turns into Waterfront Drive west of "C" Street and bends to the south as it continues to parallel the western waterfront along Humboldt Bay. Figure 2 illustrates the boundaries and layout of the City, including the city limit boundary.

The main north-south highway serving the north coast is U.S. Highway 101 (US 101). At the south end of Eureka, US 101 is a four-lane major arterial running north-south and is known as Broadway. At the northern extent of the City, Broadway turns east ninety-degrees and splits into two one-way couplets running east-west through the heart of the City. The couplets are known as 4th Street (southbound US 101) and 5th Street (northbound US 101) which continue to the Eureka Slough Bridge, beyond which US 101 is a divided four-lane highway. State Route (SR) 299 is the major east-west highway serving the north coast; it intersects with US 101 in Arcata approximately 7 miles north of Eureka and connects to Interstate 5 in Redding, California, approximately 140 miles east of Arcata.

Figure 1. Regional Setting

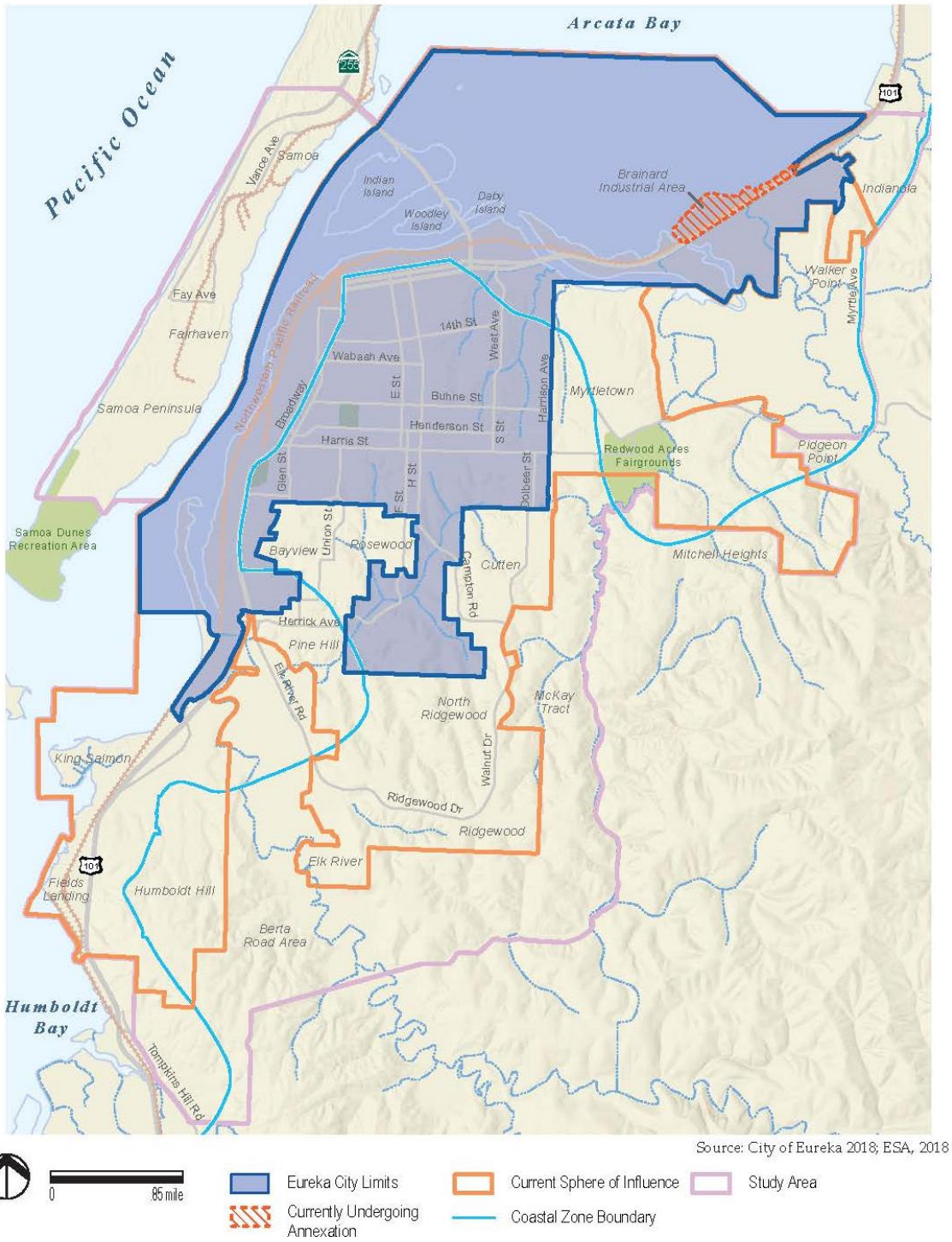
[1] U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates.

0 5 miles

Eureka City Limits

Source: City of Eureka, 2018; ESA, 2018

Figure 2. City of Eureka Planning Area



2.2 PROJECT DESCRIPTION

Overview

The project is the update to the City of Eureka General Plan Housing Element. State law requires the Housing Element to be updated every eight years. The City's updated Housing Element covers the planning period of 2019 - 2027. The Housing Element identifies the need for housing in the community as well as the City's strategy to address housing needs across a wide economic and social spectrum. The Housing Element is a mandated component of the City of Eureka 2040 General Plan and has been designed to satisfy the requirements of State law. Section 65583 of the California Government Code establishes the required components for a Housing Element.

The Housing Element consists of the following four sections: (1) Statutory Requirements; (2) Context and Strategies; (3) Goals and Policies; and (4) Housing Programs. The Technical Background Report (bound separately) provides a detailed assessment of the City's existing and projected housing needs, constraints, and opportunities for addressing those needs, and an evaluation of the City's achievements under the prior Housing Element. The Housing Element is designed to achieve the following objectives set forth in State law:

- Identify adequate sites for a range of housing opportunities;
- Assist in the development of adequate and affordable housing;
- Address constraints to meeting the City's housing needs;
- Conserve and improve the condition of housing; and
- Promote housing opportunities for all persons

According to State planning law, the Housing Element must be consistent with other General Plan elements. While each of the elements is independent, the elements are also interrelated and complementary. Certain goals and policies of each element may also address issues that are primary subjects of other elements. This integration of issues throughout the General Plan creates a strong basis for the implementation of plans and programs and achievement of community goals. The Housing Element is most closely tied to the Land Use Element as residential development capacities established in the Land Use Element are incorporated into the Housing Element.

Regional Housing Needs Assessment

One purpose for requiring local Housing Elements is to ensure that each jurisdiction provides its fair share of the regional demand for housing, thereby working to achieve the State's goal of providing "decent housing and a suitable living environment for every California family[2]." Regional shares of the statewide housing need are allocated by the State of California Department of Housing and Community Development (HCD). These allocations are provided to a region's Council of Government (COG), which determines each jurisdiction's fair-share contribution. The COG for Humboldt County is the Humboldt County Association of Governments (HCAOG).

HCD established the planning period for the current Regional Housing Needs Assessment (RHNA) from December 31, 2018 to August 31, 2027 or the 2019-2027 planning period. For this period the City was allocated a total of 952 units including 231 for Very Low Income, 147 for Low Income, 172 for Moderate Income, and 402 for Above Moderate Income. The City's RHNA is presented in Table 1 below.

[2] California Health and Safety Code Section 50000-50010.

Table 1. City of Eureka RHNA 2019-2027

Income Group	Number of Units	Percent of Total
Very Low	231	24%
Low	147	15%
Moderate	172	18%
Above Moderate	402	42%
Total	**952**	**100%**

Residential Development Potential

An important component of Eureka's strategy to provide for the housing needs of the community lies in the ability for incremental growth in residential districts. A sizeable portion of new housing construction will take place on already developed lots (non-site specific). Small-scale residential infill such as ADUs, small lot subdivisions, conservation subdivisions, and creation of additional units by converting existing space are the most probable means of housing creation in Eureka. The City is largely built-out and there are relatively few developable sites that provide realistic opportunities for new development. Because of this challenge of limited development potential on specific sites, the City has adopted a five-part strategy aimed largely at stimulating non-site-specific housing development in Eureka. These strategies are unique in that they are explicitly based on the City's existing context and designed specifically to stimulate new housing in throughout the City. The five strategies are:

1. Maximize Development Potential of the Few Remaining Vacant and Underutilized Sites
2. Accessory Dwelling Units (ADUs)
3. Internal Conversions
4. Small-lot Subdivisions and Conservation Subdivisions
5. Geographically-Dispersed Affordable Housing Through Affordable-by-Design Incentives and Local Density Bonuses

While the first strategy is largely site specific, the other four strategies are non-site-specific. The last four strategies are the most realistic means of generating new housing in Eureka. There is a very realistic chance that Eureka could see the majority of future growth in housing through the development of new ADUs, internal conversions of existing buildings, small lot subdivisions, and conservation subdivisions. In May of 2019, the City adopted new regulations that allow for the first time in over 50 years the ability to create internal conversions, small-lot subdivisions, and conservation subdivisions. Through the same action, the City also greatly expanded allowances for ADUs.

These new regulations will stimulate new housing units on already developed lots (non-site-specific) that would not have otherwise been further developed. Most importantly, the fifth strategy is a focused effort to stimulate affordable housing geographically-dispersed throughout the City. This approach is a departure from the City's previous strategy of producing affordable housing primarily through large individual (site-specific) projects. In contrast to the state mandated site inventory, the individual sites for new ADUs, internal conversions of existing buildings, small lot subdivisions, and conservation subdivisions cannot be anticipated. Because these developments result in the creation of comparatively small housing units (compared to single-family dwellings) they also present a realistic way to create housing for affordable and moderate-income households.

Strategy 1: Maximize Development Potential of the Few Remaining Vacant and Underutilized Sites
This strategy aims to allow and promote full build-out of all remaining vacant and underutilized sites in the City, across all zone districts. While there are very few such parcels available, those that do exist should be developed at their maximum densities.

Strategy 2: Accessory Dwelling Units
This strategy seeks to take advantage of the fact that over half of the City's residential units are currently single-family homes on individual lots, the vast majority of which could contain a second (accessory) unit.

Strategy 3: Internal Conversions
This strategy focuses on providing the regulatory flexibility to modify the interiors of existing structures in order to create new residential units. Such "internal conversions" and adaptive reuse of existing underutilized structures is among the least expensive and most commonly pursued paths to create housing in Eureka.

Strategy 4: Small-Lot Subdivisions and Conservation Subdivisions
This strategy focuses on embracing historic development patterns in Eureka that have been disallowed for the past several decades. Approximately 45 percent of all parcels in the City's multi-family residential zone districts are less than 6,000 square feet. Known as "small lot subdivisions," this strategy provides opportunities to create smaller-than-average developable lots (down to 2,000 square feet per lot) containing smaller-than-average single-family homes.

Strategy 5: Geographically-Dispersed Affordable Housing through Affordable-by-Design Incentives and Local Density Bonuses
This strategy is complementary to the four strategies above and will be incorporated into each of them. The strategy is based on a commitment to promote and incentivize the creation of affordable housing in all future multi-unit residential developments in Eureka, regardless of location or zone district. The objective is for affordable housing to be geographically dispersed throughout the City.

Housing Plan
Like other Elements of the General Plan, the Housing Element contains a series of goals, policies, and implementation programs that articulate a direction for Eureka's future. Goals express a desired end state reflective of the community's vision. Policies guide City decision-making and actions to support the stated goals. Implementation Programs identify specific activities or actions intended to carry out various policies. The full list of goals, policies, and implementation measures of the Housing Plan are included in Appendix A and are the basis for this Addendum. The goals of the Housing Plan are listed below for reference:

> **Goal H-1**: Eureka's development regulations, permit processing procedures, and customer service standards are development-friendly and conducive to the production of housing.
>
> **Goal H-2**: The City government actively facilitates the creation of a range of new affordable and market rate housing units to accommodate future growth and to address the needs of all socioeconomic segments of the community.
>
> **Goal H-3**: Owner-occupied affordable housing is among the mix of housing types created in Eureka.

Goal H-4: All neighborhoods are clean and safe, while all levels and types of housing units throughout Eureka are consistently maintained at a high level of quality and integrity.

Goal H-5: Existing affordable housing units are retained and preserved, while displacement from housing is minimized.

Goal H-6: All residents of Eureka have equal access to housing options.

Goal H-7: The rate of homeless in Eureka is substantially lower than it has been in the past.

Relationship to Other Policy Documents

As an element of the General plan, the Housing Element was prepared to be consistent with and conform to the recently updated General Plan 2040. The Housing Element, as a policy document, does not provide zoning or other land use approval to construct new housing units or make changes to the land use regulations in the General Plan. According to State planning law, the Housing Element must be consistent with other General Plan elements. While each of the elements is independent, the elements are also interrelated and complementary. Certain goals and policies of each element may also address issues that are primary subjects of other elements. This integration of issues throughout the General Plan creates a strong basis for the implementation of plans and programs and achievement of community goals. The Housing Element is most closely tied to the Land Use Element as residential development capacities established in the Land Use Element are incorporated into the Housing Element.

Approvals Required

The project would require the following approvals and discretionary actions from the City of Eureka:

- Adoption of the Addendum
- Adoption of the Housing Element

Other approvals will be required form the following agency:

- State Office of Housing and Community Development (HCD)

3.0 Environmental Analysis

AESTHETICS

Impacts to aesthetic resources resulting from build-out of the land uses identified in the General Plan were analyzed in the General Plan EIR Section 3.1, based on the criteria adapted from the CEQA Guidelines Appendix G. The proposed project may result in a significant impact if it will:

a. Have a substantial adverse effect on a scenic vista;
b. Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway;
c. In non-urbanized areas, substantially degrade the existing visual character or quality of the site and its surroundings, or in urbanized areas conflict with applicable zoning and other regulations governing scenic quality; or
d. Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.

ANALYSIS

General Plan EIR Determination

The General Plan EIR describes impacts to aesthetic resources that may result from development consistent with the General Plan land use designations. There are no officially designated scenic highways in the City and therefore, buildout of the General Plan will have no impact to resources within a state scenic highway. As reported by the General Plan EIR, impacts to scenic vistas, the aesthetic value of the City's visual character, and impacts from an increase in light and glare associated with buildout of the General Plan will be less than significant with implementation of General Plan policies and through compliance with the City's design review process.

Housing Element Analysis

The Housing Element provides goals, policies, and implementation measures consistent with General Plan land use and zoning designations. Many of the housing opportunity areas identified in the Housing Element are in urbanized and built-up areas that would result in compact infill development. Any infill projects, accessory dwelling units, small lot subdivisions, or the like would be in already developed areas consistent with the General Plan development density and intensities and upon adoption will not conflict with the General Plan polices for urbanized or non-urbanized areas and will not result in, either directly or cumulatively, additional impacts or increase the severity of impacts to aesthetic resources beyond those identified and addressed in the General Plan EIR. Therefore, adoption of the Housing Element will not interfere with General Plan policies intended to protect the scenic quality of the City's urban and nonurban aesthetic resources and the impact will be less than significant.

AGRICULTURE AND TIMBER RESOURCES

Impacts to agricultural and timber resources resulting from build-out of the land uses identified in the General Plan were analyzed in the General Plan EIR Section 3.2 using the following significance criteria, which are adapted from the CEQA Guidelines Appendix G. A significant impact may occur if the proposed project will:

a. Result in conversion of Important Farmland to non-agricultural use;
b. Convert aquaculture-supporting land uses to non-aquaculture-supporting uses;
c. Convert forest land to non-forest use;
d. Conflict with a Williamson Act contract;

e. Conflict with zoning for agriculture or aquaculture-supporting uses;
f. Conflict with zoning for forest land or timber land;
g. Indirectly result in the conversion of farmland to non-agricultural use;
h. Indirectly result in the conversion of aquaculture-supporting land uses to non-aquaculture-supporting land uses; or
i. Indirectly result in the conversion of forest land to non-forest use.

ANALYSIS

General Plan EIR Determination

The General Plan EIR identified less than significant impacts to important farmland and farmland zoning resulting from buildout of the General Plan. The General Plan includes designating approximately 94 acres of agricultural land near the southwestern edge of the City to a Natural Resource land use to enable its restoration from agricultural and grazing use to a salt marsh habitat, and changes in land use designations elsewhere adjacent to or in proximity to lands designated as Agriculture; however, as noted in the General Plan, the change in land use is not anticipated to preclude grazing on the site for the immediate future and will be consistent with nearby land uses . The General Plan EIR determined that implementation of General Plan Natural Resources policies for the protection of open space, including farmland, will reduce potential conflicts from incompatible land uses and the direct conversion of farmland development to less than significant. No additional mitigation was required.

Housing Element Analysis

The Housing Element provides policies for creating housing on sites already designated for urban uses in the General Plan and will not result in the conversion of any new lands to urban uses. Since the Housing Element seeks to create new housing units in already developed and urbanized areas, is consistent with the General Plan and will not result in additional impacts or increase the severity of impacts to agriculture, forestry and timber resources beyond those identified in the General Plan EIR. Adoption of the Housing Element will not interfere with General Plan policies intended to protect agriculture, forestry and timber resources and the impact will be less than significant.

AIR QUALITY

Impacts to air quality resulting from build-out of the land uses identified in the General Plan were analyzed in the General Plan EIR Section 3.3 using the following significance criteria, which are adapted from the CEQA Guidelines Appendix G. A significant impact to air quality may occur if the project will:

a. Conflict with or obstruct implementation of the applicable air quality plan;
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation;
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors);
d. Expose sensitive receptors to substantial pollutant concentrations; or
e. Create objectionable odors affecting a substantial number of people.

ANALYSIS

General Plan EIR Determination

Significant air quality impacts resulting from the construction and operation of existing and future development associated with buildout of the General Plan were identified in the General Plan EIR. All development under the General Plan will be required to comply with all North Coast Unified Air Quality

Management District (air district) rules and regulations and applicable General Plan policies, reducing the impacts to air quality from emissions generated by buildout of the General Plan land uses (construction activities, sensitive receptor exposures, and objectionable odors) to a less-than-significant level.

However, the General Plan EIR also determined that build-out of the General Plan will have the potential to contribute to continuing violations of air district standards for particulate (PM_{10}) emissions from an increase in mobile-source emissions, fireplaces and woodstoves. The General Plan EIR also identified significant impacts due to the increase in PM_{10} emissions for which the region is in non-attainment. Both impacts are identified in the General Plan EIR as a significant operational and cumulatively considerable air quality impact. Compliance with air district rules and regulations and implementation of General Plan policies will reduce operational and/or cumulative impacts that might otherwise be greater, but not to a less-than-significant level. Therefore, the General Plan EIR concluded that operational and/or cumulative impacts to air quality will be significant and unavoidable (EIR pages 3.3-45 and 3.3-46).

Housing Element Analysis
The Housing Element encourages infill development located near main transportation corridors and would not conflict with or obstruct implementation of the NCUAQMD PM_{10} Attainment Plan. The Housing Element will not change the land use patterns in ways that were not analyzed in the General Plan EIR. Future development in conformance to the Housing Element, and anticipated in the General Plan, will contribute to the construction and operational emissions impacts identified in the General Plan EIR dependent on site-specific circumstances, which will be further analyzed at the time specific development projects are proposed. New development and/or construction activities that take place as part of the Housing Element implementation would require project specific CEQA documentation would maintain compliance with current BMP's regarding dust and emission controls. Developments and/or construction activities associated with implementation of the Housing Element to create new housing units may take place near sensitive receptor areas. These individual projects will be subject to site specific review and permitting which will include a discussion of sensitive receptors. Development in conformance with the Housing Element will contribute to the significant cumulative impacts to air quality but will not result in more development than called for in the General Plan and will not result in any new or more severe impacts to air quality than those already identified and addressed in the General Plan EIR. Implementation of the Housing Element will not interfere with General Plan policies intended to minimize air quality impacts.

BIOLOGICAL RESOURCES

Impacts to biological resources resulting from buildout of the land uses identified in the General Plan were analyzed in the General Plan EIR Section 3.4 using the following significance criteria, which are adapted from the CEQA Guidelines Appendix G. Implementation of the proposed project would have a significant impact on biological resources if it will:

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service;
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service;
c. Have a substantial adverse effect on federally protected wetlands, as defined by section 404 of

the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.), through direct removal, filing, hydrological interruption, or other means;

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

ANALYSIS

General Plan EIR Determination

The General Plan EIR analysis considered locations where potential development consistent with the land use designations of the General Plan could occur in known habitat types or in locations where species have been recorded to occur, and assessed the potential for impacts from permitted activities on species' persistence or activities (foraging, nesting, estivating, or movement), or impacts to their habitats. The General Plan EIR analysis determined that implementation of the General Plan will not result in significant impacts, either directly or cumulatively, due to conflicts with adopted plans identified in criterion f (EIR page 3.4-41). The General Plan EIR did not identify significant impacts, either directly or cumulatively, to protected species or their habitat, wetlands, riparian habitat, or other sensitive natural communities, wildlife migratory corridors that could not be mitigated to a less-than-significant level through compliance with General Plan Natural Resource Element policies in addition to required agency consultation, including National Marine Fisheries Service, U.S. Fish and Wildlife Service, and California Department of Fish and Wildlife.

Housing Element Analysis

The Housing Element encourages new housing units in already developed and urbanized areas which have already been largely impacted. City identified Environmentally Sensitive Habitat Areas (ESHAs) are generally located away from the developed City center except for portions along the bay front. The Housing Element encourages development of new housing units in the already developed and urbanized portions of the City which do not include ESHA areas. Any proposed developments that occur as a result of the Housing Element would be subject to site-specific analysis for special-status species and would take place according to current City development guidelines and state and federal requirements. Based on the above, it is anticipated that impacts to biological resources as a result of Housing Element implementation will not be more significant than those discussed in the General Plan EIR, and the impact is less than significant.

CULTURAL AND TRIBAL CULTURAL RESOURCES

Impacts to historic and cultural resources, including tribal cultural resources, resulting from buildout of the land uses identified in the General Plan were analyzed in the General Plan EIR Section 3.5 using the following significance criteria, which are adapted from the CEQA Guidelines Appendix G. Implementation of the proposed project would result in a significant impact if it will:

a. Cause a substantial adverse change in the significance of a historical resource as defined in the CEQA Guidelines Section 15064.5;
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to the CEQA Guidelines Section 15064.5;

c. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
   i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k); or
   ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.
d. Disturb any human remains, including those interred outside of dedicated cemeteries.

ANALYSIS

General Plan EIR Determination

The General Plan EIR identified potentially significant impacts to cultural resources, including historical, archaeological, and tribal cultural resources (site, features, places, and cultural landscapes that are geographically defined as noted in criterion c, above) that will occur with buildout of the General Plan. The General Plan EIR analysis included the results of consultation efforts with local tribal representatives, who participated in the development of General Plan policies for the treatment of tribal cultural resources. The City and tribal representatives agreed that the tribes will be kept informed regarding development of the General Plan Update and that additional consultation will be conducted as needed (General Plan EIR page 3.5-16). For example, Policy HCP-2.9 facilitates ongoing consultation with local tribes, governments, and landowners to protect tribal cultural resources in open spaces, under conservation easements, and/or restricted development recorded on deeds, and to consider zoning changes, conservation easements, and acquisition programs as a means of preserving in place significant archaeological and cultural resources (General Plan EIR page 3.5-22). The General Plan EIR analysis determined that, despite implementation of General Plan policies for their protection (HCP 1.1 – HCP 2.9), construction and ground-disturbing activities associated with development consistent with General Plan land use designations will result in potentially significant and unavoidable direct and cumulative impacts to historic resources from site-specific demolition found to be unavoidable, and to archaeological resources, tribal cultural resources, and human remains due to incidental disruption or damage during future development activities (General Plan EIR pages 3.5-22 - 3.5-24).

Housing Element Determination

The Housing Element seeks to utilize the City's existing resources to provide more housing units for the area while still preserving the historical resources in the City. Any construction or redevelopment of existing structures will adhere to local regulations and policies regarding the preservation of historical resources. The Housing Element promotes residential development to meet the City's RHNA that would include development on vacant and developed locations. Previously identified as well as unrecorded archaeological resources could exist, and be unearthed during excavation and grading. Discovery of archaeological resources can occur even in already developed areas, as older buildings are known to have been built on top of or within archaeological deposits. The proposed Housing Element would be compliant with all General Plan, LCP, and Municipal Code policies and programs for the protection of significant historic, archaeological, and tribal cultural resources. However, the Housing element will not result in new or more severe impacts than those discussed in the General Plan EIR.

ENERGY

Impacts related to increased energy demand from buildout of the land uses identified in the General Plan are discussed in the General Plan EIR Section 3.3 using the following significance criteria, which are adapted from the CEQA Guidelines Appendix G. Implementation of the proposed project may result in a significant impact if it will:

a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

ANALYSIS

General Plan EIR Determination

The General Plan EIR did not identify any significant impacts related to energy consumption or use of energy resources associated with buildout of the General Plan that will not be reduced to a less-than-significant level with implementation of General Plan policies. Energy resources (diesel and gasoline fuel) will be used during construction of projects anticipated in the General Plan. Energy will also be consumed to provide lighting, heating, and cooling for development under the General Plan. The General Plan includes numerous policies to promote energy conservation and increase energy efficiency throughout the City. These policies are consistent with statewide goals to increase renewable energy production and improve energy efficiency and are identified on page 3.3-40 of the General Plan EIR.

Housing Element Analysis

The Housing Element encourages the use of energy efficient construction techniques and energy efficiency and weatherization services for qualified households. It also refers to the US EPA's Sustainable Solutions for Historic Houses in Northern California rehabilitation manual. By following these guidelines and consulting early with developers on energy efficient and mixed-use development, there are expected to be no additional impacts from implementation of the Housing Element. The Housing Element is consistent with the land uses and development intensities and density analyzed in the General Plan EIR and will not interfere with measures or General Plan policies intended to increase renewable energy provision, promote energy conservation, and increase overall energy efficiency throughout the City. Therefore, the Housing Element will not result in new or more severe impacts than those discussed in the General Plan EIR.

GEOLOGY, SOILS, MINERAL RESOURCES, AND PALEONTOLOGICAL RESOURCES

Impacts to geology, soils, mineral resources, and paleontological resources resulting from build-out of the land uses identified in the General Plan were analyzed in the General Plan EIR Section 3.6 using the following significance criteria, which are adapted from Appendix G of the CEQA Guidelines. Implementation of the proposed project will result in a significant impact to geology, soils, seismicity, and mineral or paleontological resources if it will:

a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
    1. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault;
    2. Strong seismic ground shaking;
    3. Seismic-related ground failure, including liquefaction; or
    4. Landslides.
b. Result in substantial soil erosion or the loss of topsoil;

c. Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on-site or offsite landslide, lateral spreading, subsidence (i.e., settlement), liquefaction, or collapse;
d. Be located on expansive soil creating direct or indirect substantial risks to life or property;
e. Have soils incapable of adequately supporting the use of septic tanks or alternative reclaimed water disposal systems where sewers are not available for the disposal of reclaimed water;
f. Result in loss of availability of a known mineral resource that would be of value to the region and the residents of the state;
g. Result in the loss of availability of a locally important mineral resource recovery site delineated in a local General Plan, specific plan, or other land-use plan; or
h. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

ANALYSIS

General Plan EIR Determination

The General Plan EIR identified less-than-significant impacts related to increased risks of human harm and property damage from seismic ground shaking, liquefaction, landslides, unstable soils, damage to property from expansive soils, loss of topsoil from soil erosion, and damage to paleontological resources. The General Plan EIR determined that no impacts to mineral resources will result from buildout of the General Plan. All development consistent with the General Plan land use designations is subject to compliance with General Plan policies, required geotechnical design recommendations, compliance with building codes and other regulatory requirements intended to reduce the risks of human harm and property damage from seismic events and unstable soils.

Housing Element Analysis

The Housing Element provides goals, policies, and implementation measures consistent with General Plan land use and zoning designations. Any new construction activities associated with implementation of the Housing Element would comply with applicable erosion control measures as defined in the City's Land Use Code and Best Management Practices Manual such as re-vegetation and covering soil stockpiles would be utilized during any such activities. Implementing these measures would avoid substantial erosion or topsoil loss. The Housing Element seeks to encourage infill projects in already developed neighborhoods. Based on the above, and by adhering to the standards of the California Building Code and current City regulations, any impacts from implementation of the Housing Element are not anticipated to be more significant than those already discussed in the General Plan EIR.

GREENHOUSE GASES

Impacts to greenhouse gases resulting from build-out of the land uses identified in the General Plan were analyzed in the General Plan EIR Section 3.3 using the following significance criteria, which are adapted from the CEQA Guidelines Appendix G. Implementation of the proposed project may result in a significant impact related to greenhouse gas emissions if it will:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

ANALYSIS

General Plan EIR Determination

The General Plan EIR did not identify any significant impacts related to construction and operational GHG emission volumes generated by buildout of the General Plan that will not be reduced to a less-than significant level with implementation of General Plan policies. Direct sources of emissions include mobile sources, combustion of natural gas, and landscaping activities. Indirect emissions include electricity consumption, solid waste disposal, and water and wastewater treatment. The General Plan includes numerous policies to reduce GHG emissions from construction and operation of development. These policies are consistent with statewide goals to increase renewable energy production, reduce building energy consumption, and improve energy efficiency and are identified on page 3.3-51 of the General Plan EIR. The General Plan EIR determined that construction and operation of projects proposed under the General Plan will be required to comply with the policies of the General Plan, North Coast Unified Air Quality Management District requirements, and State regulations.

Housing Element Analysis

The Housing Element does not propose a change in any land use policy or building regulations that would raise or otherwise change development levels that could contribute to an increase in GHG. Any development projects that take place as a result of the Housing Element would be subject to California Building Code regulations and individual site permitting. Additionally, since the Housing Element encourages development in already developed and urbanized portions of the City, residents are more likely to utilize existing public transportation systems which has the potential to reduce GHG emissions. The Housing Element is consistent with the land uses and development intensities and density analyzed in the General Plan EIR and will not interfere with measures or General Plan policies intended to reduce GHG emissions. The Housing Element is consistent with state air quality regulations in that it encourages infill projects, redevelopment, and adaptive use sites which have the potential to reduce residential commutes and encourage the use of existing public transportation systems. Therefore, any impacts associated with implementation of the Housing Element are not anticipated to be more severe than those previously discussed in the General Plan EIR.

HAZARDS AND HAZARDOUS MATERIALS

Increased risks of exposure to hazards and hazardous materials resulting from build-out of the General Plan were analyzed in the General Plan EIR Section 3.7 using the following significance criteria, which are based on the CEQA Guidelines Appendix G. Implementation of the proposed project will result in a significant impact relative to hazards and hazardous materials if it will:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, create a significant hazard to the public or the environment;
e. For a project located within an airport land-use plan or, where such a plan has not been adopted, within two miles of a public airport or a public-use airport, result in a safety hazard for people residing or working in the project area;

f. For a project within the vicinity of a private airstrip, result in a safety hazard for people residing or working in the project area;
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or
h. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

ANALYSIS

General Plan EIR Determination

As noted in the General Plan EIR (page 3.7-19), General Plan implementation will be regulated by various federal, state, and local laws, regulations, and policies summarized in the General Plan EIR Section 3.7. The General Plan EIR did not identify significant impacts related to increased risk of exposure to hazards or hazardous materials, or increased exposures to airport runway zones or wildland fire hazards resulting from buildout of the General Plan land uses, that will not be reduced to less than significant through compliance with General Plan policies and with applicable federal, state and local laws governing transportation, use, handling, and disposal of hazardous materials.

Housing Element Analysis

The Housing Element encourages the development of new housing units within already developed and urbanized portions of the City. Residential development does not require and is not expected to require the manufacturing, use, transportation, disposal, or storage of dangerous quantities of hazardous materials. Residential uses do not generate hazardous wastes or emissions, except for very small quantities of typical household cleaning agents, automotive maintenance products, paints, pesticides, and herbicides. The proposed Housing Element would not conflict with any hazardous materials regulations and would not exempt any future housing from the City's programs to control and safely dispose of hazardous materials and wastes or to reduce the volume of wastes requiring landfill disposal.

The City of Eureka is a participant in the Humboldt Operational Area Hazard Mitigation Plan which was updated in 2014. This plan meets the requirements of the Disaster Mitigation Act and takes a proactive approach to planning for disaster situations. The Housing Element does not propose any site-specific developments; however, it does encourage infill projects to provide new housing units for the City. Any new development as a result of implementation of the Housing Element is not anticipated to interfere with current emergency response plans including the Area Hazard Mitigation Plan because development will likely take place in areas easily accessible by main evacuation routes. Therefore, Housing Element implementation will not result in new or more severe impacts than those previously discussed in the General Plan EIR.

HYDROLOGY AND WATER QUALITY

Environmental impacts to hydrology and water quality resulting from buildout of the Eureka General Plan were studied in the General Plan EIR Section 3.8 using the thresholds of significance listed below, which are adapted from the CEQA Guidelines Appendix G. A significant impact may result if implementation of the Housing Element results in any of the following:

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade water quality;

b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level;
c. Substantially alter the existing drainage pattern of a site or area through the alteration of the course of a stream or river, or by other means, in a manner that would result in substantial erosion or siltation on- or off-site or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site;
d. Create or substantially contribute to runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff;
e. Place housing or other improvements within a 100-year flood hazard zone as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard map or impede or redirect flood flows;
f. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam; or
g. Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow.

ANALYSIS

General Plan EIR Determination

As noted in the General Plan EIR, future development in the City will increase the overall amount of impervious surfaces, which could affect drainage patterns, reduce groundwater recharge creating changes to storm water flows and water quality. Although much of the development permitted under the General Plan will be located on sites that have already been developed, future development under the General Plan will increase impervious surfaces over existing conditions due to infill development on undeveloped sites and development in areas that are currently sparsely developed. With respect to the environmental topics for significance criteria a-d, the General Plan EIR did not identify significant impacts that will not be reduced to less than significant through compliance with General Plan policies, municipal code requirements, and conformance with applicable state and federal permitting requirements designed to protect water quality, including requirements of the National Pollutant Discharge Elimination System and the California Construction Stormwater Permit. Conformance with these policies and regulatory programs require implementation of site design measures, low-impact development (LID) methods, and best management practices (BMPs), which include infiltration features such as detention and retention basins, that will contribute to groundwater recharge and minimize storm water runoff. There are no dams located within or upstream of the City.

The General Plan EIR also did not identify significant impacts from the placement of new, or exposure of existing, development within designated Federal Emergency Management Agency (FEMA) designated 100-year flood plains (see General Plan EIR Figure 3.8-1), or from an increase in risks of loss, injury or death from flooding due to increased exposure to levee failure, sea level rise, or inundation by seiche or tsunami, that could not be reduced by compliance with General Plan policies and conformance to development standards.

Housing Element Analysis

Housing Element does not specify any site-specific development. However, implementation of the Housing Element may lead to individual projects where construction activities take place. These individual projects would be subject to site-specific permitting. Though this permitting process site-specific erosion plans and stormwater pollution prevention plans would be put in place to ensure that

no waste discharge requirements or other surface water requirements are violated. Additionally, potential development areas would utilize existing stormwater systems and are likely to take place in areas where much of the ground is already covered with impervious surfaces. This will help project groundwater resources from potential harmful impacts.

According to California Emergency Management Agency maps, portions of Eureka along Humboldt Bay, including sections of Old Town and the commercial area between Highway 101 and Humboldt Bay to the west of the City center, could be inundated by tsunamis. The Housing Element encourages infill and mixed-use projects in already developed portions of the City including Old Town Eureka. As these areas are already developed it is anticipated that any projects implemented as part of the Housing Element would not create any new substantial source of pollutants in the event of inundation by a tsunami. Due to the above, and the Housing Element's compliance with the General Plan, local, regional, and statewide plans, any impacts to hydrology and water quality are not anticipated to be more significant than those already discussed in the General Plan EIR.

LAND USE, POPULATION AND HOUSING

Impacts to land use, population, and housing resulting from build-out of the land uses identified in the General Plan were analyzed in the General Plan EIR Section 3.9, using the following significance criteria, which are based on Appendix G of the CEQA Guidelines. A significant impact may occur if the proposed project will:

a. Physically divide an established community;
b. Conflict with any applicable land-use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the General Plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect;
c. Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure); or
d. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

ANALYSIS

General Plan EIR Determination

The General Plan EIR analyzed land use, population and housing issues that may arise with implementation of the General Plan. The General Plan Land Use Element policies provide for a pattern of mixed land uses at densities/intensities consistent with the development patterns Eureka experienced from the 1870s to the 1940s and at densities/intensities that are higher than were allowed in the past three General Plans. The Land Use Element goals include focusing the pattern of land uses to radiate out from the City's core, employment areas, commercial corridors, and commercial centers to make efficient use of the City's limited remaining developable lands and to promote walkability and urban growth, while preserving existing viable neighborhoods (GP EIR, page 3.9-23).

The General Plan includes policies designed to ensure its implementation is consistent and compatible with applicable land use plans, policies, and regulations of agencies with jurisdictional authority in unincorporated areas identified in the General Plan planning boundary and adjacent lands. The General Plan EIR analysis did not identify significant impacts related to land use, population, and housing that could not be reduced to a less-than-significant level through compliance with policies included in the General Plan Land Use Element. The General Plan EIR determined that traffic volumes generated by development consistent with the General Plan land use designations will not conflict with the Humboldt

County Association of Governments Regional Transportation Plan; but will not meet state requirements for reductions in VMT (refer to the related discussion in Transportation Section). Otherwise, no impacts were identified indicating a significant conflict with other applicable land use plans, policies, and regulations of agencies with jurisdictional authority in unincorporated areas identified in the General Plan planning boundary and adjacent areas.

General Plan Policy LU-5.3 encourages increased development of high-density housing to balance the City's housing inventory and enhance affordability. General Plan Policy LU-5.4 encourages the location of high-density housing in proximity to commercial and community services, employment opportunities, major transportation corridors, and where City infrastructure can accommodate increased densities. Policy LU-6.2 promotes the development of vacant infill properties and redevelopment/reuse of economically underutilized sites and buildings to accommodate new growth and internal densification.

Housing Element Analysis
The Housing Element is a required section of the Eureka General Plan that provides goals, policies, and implementation measures consistent with General Plan land use and zoning designations. As such, it is consistent with the land uses and development intensities and density analyzed in the General Plan EIR. The Housing Element seeks to promote development of housing in already established neighborhoods and would not directly cause the division of the established communities within the broader community of the City of Eureka. As such, no new or more severe impacts are anticipated on land use, population, and housing beyond those analyzed in the General Plan EIR.

NOISE AND VIBRATION

Environmental impacts related to an increase in noise and vibration sources resulting from buildout of the Eureka General Plan were studied in the General Plan EIR Section 3.10 using the following significance criteria adapted from the CEQA Guidelines Appendix G. A significant impact may occur if implementation of the proposed project will result in any of the following:

a. Exposure of persons to, or generation of, noise levels in excess of the standards established in the City's existing General Plan or applicable standards of other agencies;
b. Exposure of persons to, or generation of, excessive airborne noise levels or groundborne vibration;
c. A substantial permanent increase in noise levels relative to ambient noise levels in the project area;
d. A substantial temporary or periodic increase in noise levels relative to ambient noise levels in the project area;
e. or a project located within an airport land use plan or, where such a plan has not been adopted, within 2-miles of a public airport or public use airport, where the project would expose people residing or working in the area to excessive noise levels; or
f. For a project within the vicinity of a private airstrip, where the project would expose people residing or working in the project area to excessive noise levels.

ANALYSIS
General Plan EIR Determination
The General Plan EIR did not identify significant impacts related to permanent increases in groundborne vibration and groundborne noise levels resulting from implementation of the General Plan. Operations of future planned development within the City will not involve equipment that will produce groundborne vibration (i.e., underground railways) and therefore, no impacts related to the exposure of people or structures to these sources of vibration will occur (GP EIR, pages 3.10-17 – 3.10-18).

Construction activity is identified as the primary source of significant noise impacts within the City. The General Plan EIR did not identify any direct or cumulative significant impacts related to the generation of or exposure to unacceptable noise levels or increases in short term or ambient noise levels that could not be mitigated to a less than significant level through compliance with General Plan Policies. The General Plan Noise Element contains policies that minimize the generation of and exposures to unacceptable noise. These policies include requirements for the preparation of project-specific acoustical analysis, construction vibration assessments, placement of noise-sensitive uses and equipment, new stationary noise sources, days and hours of construction, and performance thresholds for new roadways.

Housing Element Analysis

The Housing Element is consistent with the land uses and development intensities and density analyzed in the General Plan EIR and will not interfere with measures or General Plan policies intended reduce noise impacts. The Housing Element encourages the development of new housing units in already developed portions of the City. Construction activities resulting from the implementation of the Housing Element may produce some noise and ground vibration. It is possible that certain construction activities associated with future development may, in some cases, lead to substantial temporary or periodic increases to ambient noise levels. With appropriate noise reduction and shielding measures, temporary or periodic increases to the ambient noise level could be substantially reduced. All development is subject to compliance with the General Plan Noise Element policies and requirements of the City's Municipal Code. Any such construction projects would be subject to site specific construction plans and City policies pertaining to noise. As part of this process, any impacts from vibration associated with the site-specific project would be discussed and mitigated as needed as determined in the General Plan EIR. The Housing Element will not result in new or more severe noise impacts that are not already addressed in the General Plan EIR, impacts are considered to be less than significant.

PUBLIC SERVICES AND RECREATION

Environmental impacts to public services and recreation that will result from buildout of the General Plan Land Uses were studied in the General Plan EIR Section 3.11 using the following significance criteria adapted from the CEQA Guidelines Appendix G. A significant impact may occur if implementation of the proposed project will result in any of the following:

a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: fire protection, police protection, schools, or other public facilities;
b. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or
c. Require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

ANALYSIS

General Plan EIR Determination

The General Plan EIR determined that implementation of the General Plan will result in gradual physical development over a 20-year planning horizon, which will increase demand for public services and recreational facility needs. The General Plan EIR did not identify significant impacts to the City's ability to provide fire protection, law enforcement, schools, parks and recreation, and other community services that could not be reduced with implementation of General Plan policies.

Housing Element Analysis
The Housing Element is consistent with the land uses and development intensities and density analyzed in the General Plan EIR and will not generate an increase in population and subsequent increased demands for public services beyond the level of increased service demand analyzed in the General Plan EIR. In addition, future development will be required to pay all required impact fees and will be subject to General Plan policies intended to ensure adequate service provision. The proposed project will not result in additional impacts or increase the impacts on public services beyond those identified in the General Plan EIR.

TRANSPORTATION

Impacts to the local and regional circulation system (refer to General Plan EIR Figure 3.12) that will result from implementation of the General Plan were studied in the General Plan EIR Section 3.12 using the significance criteria below, which are adapted from Appendix G of the CEQA Guidelines. The General Plan EIR includes an analysis of vehicle miles traveled (VMT). The 2019 amendments to Appendix G include a new topic addressing vehicle miles traveled (VMT) as a metric for determining the significance of transportation impacts, as codified in the CEQA Guidelines Section 15064.3(b). Implementation of the proposed project may have a significant environmental impact if it will:

a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, mass transit, and vehicle miles traveled (VMT), including CEQA Guidelines § 15064.3, subdivision (b) describing specific considerations for evaluating VMT;
b. Conflict with an applicable congestion management program, including, but not limited to level of services standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways;
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks;
d. Substantially increase hazards due to a design feature. (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment);
e. Result in inadequate emergency access; or
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

The City of Eureka's adopted standard of significance for evaluating traffic impacts is Level of Service C (LOS C) on all roadway segments, except for any portion of US-101, where the standard is LOS D. A significant traffic impact or operational deficiency will occur if operations deteriorate from LOS C or better to LOS D or worse. A significant impact will occur to signalized intersections of U.S. Highway 101 if operations decline from LOS D to LOS E or worse.

ANALYSIS

General Plan EIR Determination
The General Plan EIR identified less-than-significant direct and cumulative impacts related to the environmental criteria listed above with the exception of consistency with plans adopted for the reduction of VMT (significance criterion a). In all other instances, the General Plan EIR found that implementation of General Plan policies will reduce potentially significant impacts resulting from buildout of the General Plan to less than significant.

The General Plan EIR determined that traffic volumes generated by development consistent with the General Plan land use designations will not conflict with the Humboldt County Association of Governments Regional Transportation Plan, but will not meet state requirements for reductions in VMT (GP EIR, page 3.12-40). Although the General Plan includes a number of policies that call for decreasing per-capita VMT through more efficient transit operations, an increased availability of alternative modes of transportation (walking, biking, etc.), and through the implementation of Transportation Demand Management programs, the largest reductions will result from implementation of Land Use Element policies. These policies provide for increased densification, infill development, and include provisions for housing and employment within the central core of the City. Each of these land use characteristics will contribute to an overall decrease in VMT when compared with more traditional suburban development on the City's fringes (page 3.12-39). The General Plan EIR notes that the effectiveness of these strategies in Eureka is lessened by the existing development patterns of the area and the continued reliance on automobile travel in this rural portion of the state. Despite a more compact development pattern that relies heavily on infill, the General Plan EIR concluded that compliance with these policies will result in only an incremental reduction in VMT, which is less than the 15 percent reduction recommended by the Governor's Office of Planning and Research. As a result, the General Plan EIR concluded that a significant and unavoidable impact will occur.

However, CEQA Guidelines Section 15064.3(b)(1) states that for land use projects, VMT that exceeds an applicable threshold of significance may indicate a significant impact. Projects that are located within one-half mile of existing major transit stops or stops along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact, as should projects that decrease vehicle miles traveled in the project area compared to existing conditions.

Housing Element Analysis

The Housing Element is a part of and aligns with the 2040 General Plan for the City of Eureka. It promotes the development of new housing units and infill projects in close proximity to areas currently served by the transportation system and encourages the use of multimodal transportation. The types of land uses, amount of development, and land use patterns allowed under the Housing Element will be consistent with those analyzed in the General Plan EIR. Development allowed under the proposed project will generate vehicle trips and traffic patterns similar to those analyzed in the General Plan EIR.

Development of new housing units as a result of the Housing Element could increase traffic on existing roadways. However, roadway design features would be evaluated for each individual development and would be subject to traffic engineering design standards. These standards regulate features such as right-of-way widths, the number of lanes necessary, curb to curb separation distances, and facility-type classification and require roadway designs consistent with Caltrans' Highway Design Manual, California Manual of Uniform Traffic Control Devices (MUTCD), City standard, and others which also account for emergency access to proposed development sites. As such, any impacts associated with implementation of the Housing Element are not anticipated to be more significant than those previously discussed in the General Plan EIR.

UTILITIES AND SERVICES SYSTEMS

The General Plan EIR analyzed the impact of buildout of the General Plan land use designations to utilities and service systems in Section 3.13 using significance criteria adapted from the CEQA Guidelines Appendix G. A significant impact may result from the proposed project if it will:

a. Have insufficient water supplies available to serve the City from existing entitlements and resources;
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
c. Exceed wastewater treatment requirements of the DWR and applicable Regional Water Quality Control Board;
d. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments;
e. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
f. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff;
g. Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs;
h. Not comply with federal, state, and local statutes and regulations related to solid waste;
i. Land uses or development patterns that cause wasteful, inefficient, or unnecessary consumption of energy;
j. Land uses that require or result in the construction of new or expanded energy production or transmission facilities, the construction of which could cause significant environmental effects; or
k. Land uses that require or result in the construction of new or expanded telecommunication networks or facilities, the construction of which could cause significant environmental effects.

ANALYSIS

General Plan EIR Determination

The General Plan EIR analyzed potential impacts from the implementation of the General Plan on utilities and service systems, including electric power, natural gas and telecommunications facilities within the City of Eureka. The General Plan includes policies that identify, protect, and enhance utility resources that are unique to the City related to water, wastewater, storm water, solid waste, energy, and telecommunications systems. The General Plan EIR notes that since the City is largely a built-up urban environment, implementation of the General Plan will likely result in gradual physical changes over the 20-year period of the General Plan. It is also anticipated that these changes will be distributed broadly and incrementally across the City and will not comprise a substantial intensification or concentration of physical development.

The General Plan EIR did not identify significant impacts to the City's utilities and service systems resulting from new development consistent with General Plan land use designations that could not be reduced to less than significant with implementation of General Plan policies. Key policies focus on infill development and development of underutilized and/or vacant sites, storm water best management practices, low impact development, maintenance and improvement of water, wastewater, and storm water facilities and related infrastructure, compliance with federal, state and local regulations, and will increase energy efficiencies.

The General Plan EIR found that sufficient water supplies, wastewater treatment capacity, and solid waste disposal capacity will be available to serve increased demand from buildout of the General Plan land uses and potential new development consistent with the General Plan land use designations.

Buildout will not be expected to result in substantial changes to existing and planned improvements to utilities and service system infrastructure within the City and the surrounding area. Development of future land uses to accommodate anticipated growth could result in localized impacts and exceed the capacity of storm drainage facilities, which could result in the need for the construction of new storm water drainage facilities or expansion of existing facilities. The details of future development are unknown at this time and impacts to service systems will be analyzed when site-specific development is proposed.

New development will be required to mitigate impacts and be timed to match the capacity of storm drainage facilities. In the meantime, the City will continue to update its storm water master plan, and remain in compliance with the implementation of the existing NPDES permit. The General Plan EIR notes that future development associated with the buildout of the General Plan will primarily occur in, adjacent to, or in the vicinity of existing developed urban areas. These land use patterns allow for the logical extension and utilization of existing utilities, and public services, and other amenities such as proximity to employment centers, and commercial uses (GP EIR, page 3.13-34). The General Plan EIR concluded that this pattern of physical development combined with implementation of policies will reduce impacts related to energy consumption and increased demand for other utilities and service system to less than significant.

Housing Element Analysis
The Housing Element is a part of and is consistent with the goals and policies outlined in the General Plan for buildout of the City. Implementation of the Housing Element is likely to result in new housing units that would require new extension of services including water, wastewater, and solid waste disposal. This additional demand was considered in the General Plan and any impacts to utilities and service systems as a result of the Housing Element are expected to be in keeping with the analysis of the General Plan EIR. The Housing Element will not result in any impacts that are new or more severe than those already analyzed in the General Plan EIR.

WILDFIRE

The following discussion is based on the 2019 amendments to the CEQA Guidelines Appendix G, which includes the following discussion topics if a project is located in or near a state responsibility area or consists of land classified as a very high fire hazard severity zone. The proposed project may result in a significant impact if it will:

a. Substantially impair an adopted emergency response plan or emergency evacuation plan;
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire;
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

ANALYSIS

General Plan EIR Determination
The City of Eureka is not located within a state responsibility area, although some portions of the City to the south and east are located within moderate to high fire hazard severity zones. Under the California Fire Plan the City falls under the jurisdiction of CAL FIRE's Humboldt Del-Norte Unit Fire Plan. As noted in

Eureka General Plan Community Background Report (City of Eureka 2015) (Background Report), the predominant winds in Eureka are from the north-northwest at an average speed of 8 to 10 miles per hour (page 6-97). Due to the City's location along the coast, downslope from moderate to high fire hazard areas, and the direction of prevailing winds, the potential for air pollutant accumulation from wildland fires is low.

The Background Report also notes that wildland fires are an annual hazard in the City's General Plan Planning Area where natural vegetation on undeveloped lands are considered at risk (page 6-151). The City is also subject to secondary impacts such as increased risks of downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or wildfire-related drainage changes, should a wildfire occur. However, the presence of wildland fire hazards requires development to meet special standards corresponding with each degree of risk. This includes standards as listed in the California Building Code Chapter 7A–Wildland-Urban Interface (WUI) Fire Conformance Checklist, which provides a reasonable level of exterior wildfire exposure protection for buildings in wildland-urban interface fire areas. These development standards address access, road widths, bridges, building construction, vegetation clearing, and hydrant and water systems.

A number of General Plan policies also ensure protection against wildland fires and their aftermath. These are identified in the General Plan EIR pages 3.11-23 – 3.11-24. As reported in Section 3.9, the General Plan EIR did not identify significant impacts related to increased risk of exposure to wildland fire hazards or interference with emergency evacuation routes and plans resulting from buildout of the General Plan land uses, that could not be reduced to less than significant through compliance with General Plan policies and with applicable federal, state and local laws. Conformance with these policies reduces the risks of wildland fire and secondary impacts to less than significant. Further, implementation of the General Plan Land Use Element policies provides for increased densification, infill development, and includes provisions for housing and employment within the central core of the City. As such development is consistent with General Plan land use designations that may require the construction or maintenance of associated infrastructure such as roads, fuel breaks, emergency water sources, power lines or other utilities, it is not likely to exacerbate fire risk or result in any other temporary or ongoing impacts to the environment that have not already been addressed by the analysis in the General Plan EIR.

Housing Element Analysis

The Housing Element promotes the development of additional housing units within already developed and urbanized areas that are accounted for in existing local and regional hazard plans as discussed under the General Plan EIR analysis. The development density and intensities allowed under the Housing Element are consistent with those analyzed in the General Plan EIR and existing and new development would be required to comply with all applicable regulations. As such, the Housing Element will not result in any impacts that are new or more severe than those already analyzed in the General Plan EIR.

MANDATORY FINDINGS OF SIGNIFICANCE

The General Plan EIR analyzed the impact of buildout of the General Plan land use using significance criteria adapted from the CEQA Guidelines Appendix G. The proposed Housing Element would result in a significant impact if it would:

a. Have the potential to degrade the quality of the environment; substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; substantially reduce the number or

restrict the range of an endangered, rare, or threatened species; or eliminate important examples of the major periods of California history or prehistory;

b. Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects); or
c. Have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly.

ANALYSIS

As described in this Addendum, new construction or physical changes resulting from future projects consistent with General Plan land use designations and in conformance with the Housing Element would not result in new or more severe impacts than are addressed in the General Plan EIR. The Housing Element provides goals and policies to encourage the development of housing units in the City of Eureka in order to meet RHNA goals. Future development under the proposed project would be required to comply with all applicable regulations protecting the marine and terrestrial plant and wildlife species, and significant historic, archeological and tribal cultural resources. New development would be subject to compliance with the General Plan policies intended to minimize environmental impacts to biological and cultural resources. The Housing Element is consistent with the land use densities and patterns identified in the General Plan and analyzed in the General Plan EIR. As a result, the Housing Element would not degrade the quality of the natural environment to an extent greater than addressed in the General Plan EIR. Implementation of the Housing Element would not prevent significant and unavoidable impacts to historic resources resulting from unavoidable demolition of significant historic buildings as described in Section 3.5 and as identified and addressed in General Plan EIR Section 3.5. However, implementation of the Housing Element would not result in new or more severe impacts to significant historic resources than those identified and addressed in the General Plan EIR. No further discussion is required.

The Housing Element is consistent with the land uses and development intensities and density analyzed in the General Plan EIR. The General Plan EIR analyzed the impact of the creation of up to 1,886 additional housing units in the city. This is approximately double the 2019-2027 RHNA of 952 units, and as such demonstrates that the potential environmental impacts related to the Housing Element are well within the analysis contained the adopted General Plan EIR. Implementation of the Housing Element would not result in any impacts that are new or greater in severity than those already analyzed in the General Plan EIR. Therefore, the proposed project would not result in a substantial adverse effect, directly or indirectly, on human beings and the Housing Element would result in a less-than-significant impact. No further discussion is required.

4.0 Conclusion

Based on the environmental analysis presented in Section 3 of this Addendum, the 2019-2027 Housing Element is well within the analysis contained the adopted General Plan EIR. The Housing Element was prepared to comply with the adopted General Plan and current state requirements. As noted in this Addendum, the General Plan EIR identified significant and unavoidable impacts associated with buildout of General Plan land uses as follows:

- Increase in operational PM_{10} emissions that exceed air district standards, and for which the air basin is in non-attainment;
- Potentially significant direct and cumulative impacts by causing substantial changes in the significance of historic resources;
- Potentially significant direct and cumulative impacts by causing substantial changes in the significance of archaeological and tribal cultural resources, including human remains; and
- Unacceptable increase in vehicle miles travelled (VMT) that does not meet recommended reduction targets.

The General Plan EIR analyzed the impact of the creation of up to 1,886 additional housing units in the city. This is approximately double the 2019-2027 RHNA of 952 units, and as such demonstrates that the potential environmental impacts related to the Housing Element are well within the analysis contained in the General Plan EIR. The environmental analysis herein has not revealed that changes in circumstances have occurred since the General Plan EIR was certified that will lessen certain impacts, and no new information of substantial importance has been identified that indicates the Housing Element will have new or more severe impacts than were identified in the General Plan EIR. Therefore, the proposed project will not result in new significant impacts or substantially increase the severity of previously identified significant effects. Correspondingly, there are no mitigation measures or alternatives that were previously found not to be feasible that will in fact be feasible, or that will be considerably different from those analyzed in the General Plan EIR, which will substantially reduce one or more significant impacts. The Housing Element is consistent with the General Plan. No changes to the conclusions of the General Plan EIR are necessary and no further environmental review is required.

5.0 References

City of Eureka. October 2018a. City of Eureka 2040 General Plan Update Draft Environmental Impact Report. SCH #2016102025.
https://transfer.ci.eureka.ca.gov:5252/fsdownload/P4XaBZPUQ/CC%20Draft%202040%20General%20Plan

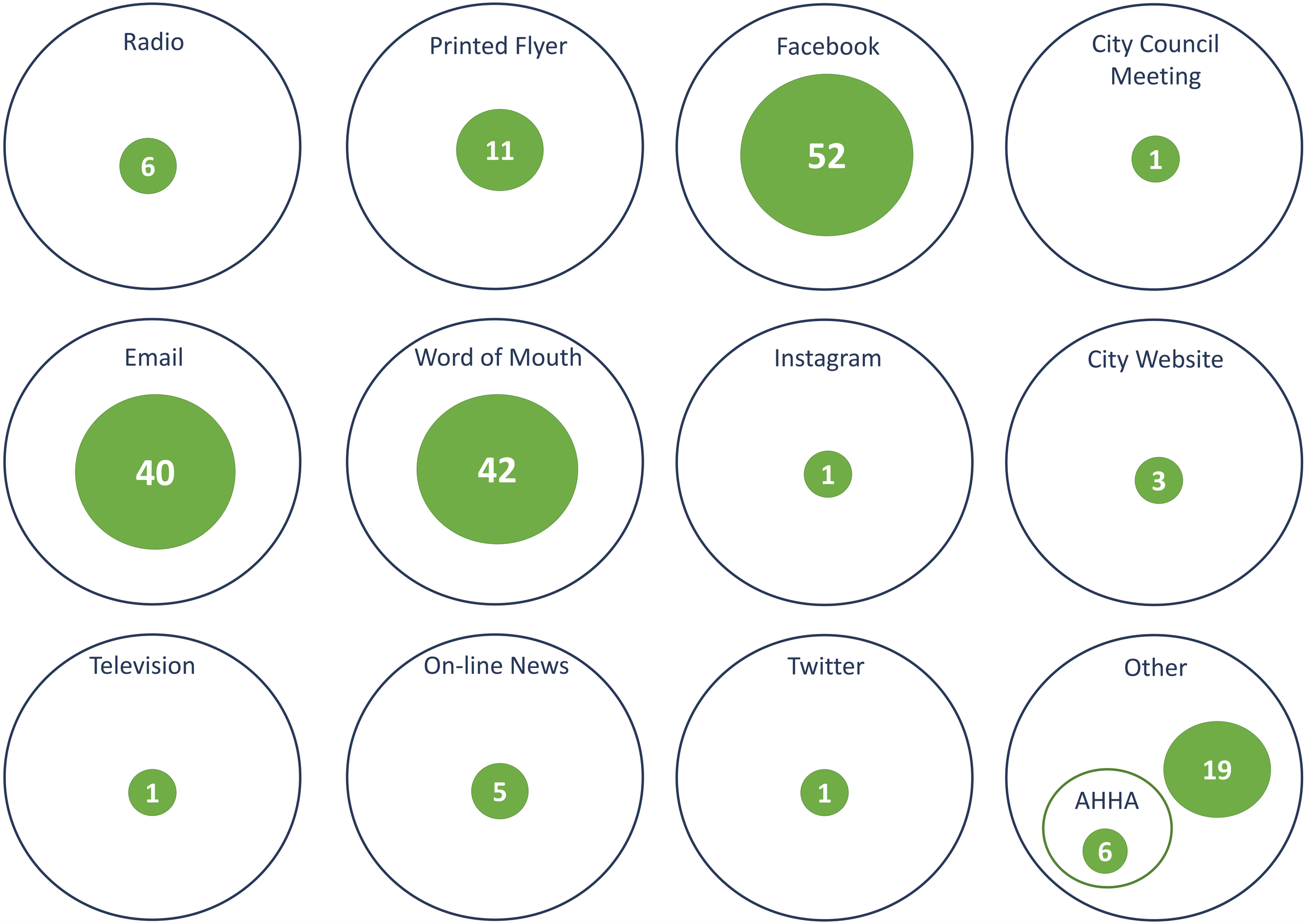
City of Eureka. October 2018b. City of Eureka 2040 General Plan Update Final Environmental Impact Report. SCH #2016102025.
https://transfer.ci.eureka.ca.gov:5252/fsdownload/P4XaBZPUQ/CC%20Draft%202040%20General%20Plan

City of Eureka. October 2018c. City of Eureka 2040 General Plan.
https://transfer.ci.eureka.ca.gov:5252/fsdownload/P4XaBZPUQ/CC%20Draft%202040%20General%20Plan

City of Eureka. February 2019. Addendum to City of Eureka 2040 General Plan EIR, Zoning Code Update.

EUREKA HOUSING WORKSHOP – April 10, 2019

HOW DID YOU HEAR ABOUT THIS MEETING? (vote for all that apply).



Regional Housing Needs Allocation

Eureka is required by the State of California to plan for the creation of 952 housing units between 2019 and 2027 (119 per year).

Where would you put them?

Things to keep in mind:

- Each pink dot represents one housing unit. A housing unit could be an apartment in an apartment building, a condo, a mother-in-law unit, or a single-family home.
- Think generally about the location. You don't need pinpoint the exact parcel.
- Try to avoid covering up other people's dots ☺

EUREKA HOUSING WORKSHOP – April 10, 2019

How (and where) to create housing?

Vote along each spectrum…

1. Build on the last remaining lots

Be cautious about this. Don't make Eureka too crowded.

1

1

3

1

12

Go big! Maximize development on every remaining lot.

Vote along the spectrum

2. Multi-story apartments in Downtown

Be cautious about this. We don't need any new tall buildings, especially not with housing units.

9

13

Go big! Build the biggest buildings possible and fill them with housing.

Vote along the spectrum

3. Convert (portions) of Old Buildings to Housing

This is unrealistic. Focus on other priorities.

10

16

This is a great way to save old buildings and create housing at the same time.

Vote along the spectrum

4. Accessory Dwelling Units (mother-in-law units)

No! This will overcrowd my Neighborhood.

9

12

Yes! These smaller units will be more affordable and be very compatible with Eureka

Vote along the spectrum

5. Small Lot Subdivisions (make smaller lots with smaller houses)

No! Only big lots and big houses belong in Eureka.

1

1

2

8

17

Many of these already exist and they create good opportunities for new housing

Vote along the spectrum

Housing Related Programs from across California

Which of these would you like to see happen in Eureka?

Efficiency Improvement - Online Development Portal

1. Improve capabilities on website to provide accurate land use information quickly and accurately
2. Match performance of online portals used in other California cities

1

Development Coordination - Vacant and Underutilized Lots (Intentions Inquiry)

1. Write letters to property owners.
2. Create database of development interest that can be used to help staff prioritize resources

6

Development Coordination - Promote Affordable-by-Design Development to Developers

1. Parking not required if unit <500sf
2. Can be used to meet RHNA needs for low and moderate income units, if justified by rental cost data. (The Annual Report for HCD includes this space on the form)
3. More attractive to most developers because deed restriction (and means testing) not required.

4

Modify Zoning Code to Allow Tiny House on Wheels

1. Fresno allows this
2. Sewer, Water, and Power connections required
3. The backyard of a single family home because a one-space RV park
4. Tiny Houses on Wheels are considered permanent housing

14

Condominium Conversion

1. Modify zoning code to provide a clear regulatory path for the conversion of apartment buildings into condos
2. Provides opportunity for home ownership at a lower price

11

Collaborate with Service Providers on Homelessness (Liaison)

Tenant/Landlord Mediation and Fair Housing Information

Seek Funding for Services for Special Needs Populations (very low income, seniors, disabled persons)

Promote Housing Choice Vouchers (Section 8) with Landlords

Wheelchair Ramp Grant

Tenant/Landlord Mediation and Fair Housing Information

13

Development Code - Public Improvements Required (PIR) Update (Sidewalk creation/repair requirements, alley paving requirements, curb-cut repair requirements)

1. Public Works and Development Services collaborate to update and streamline the PIR requirements and process.
2. Recognizes that high cost PIRs discourage small residential developments like ADUs
3. Recognizes that a balance must be reached between housing needs and infrastructure maintenance needs.

7

Land Availability - Vacant and Underutilized Lot Inventory

1. Planning staff maintains updated inventory of all sites (not just RHNA-allocated sites)

6

Development Coordination – High Priority Vacant and Underutilized Lots (Pre-Permitting)

1. Uses Site Inventory data
2. Focuses on large sites
3. Plan A "What will it take for you to develop this?"
4. Plan B "Would you be willing to sell so someone else can develop it? We can help facilitate that."

3

Development Coordination - Conversion of Underutilized Non-residential Space (Outreach)

1. Target vacant upper stories in downtown and old town.
2. First 8 apartments free in Downtown zone (no parking required)
3. First 4 apartments free in Henderson Center, Wabash Avenue, and Neighborhood Commercial (no parking required)

4

Motel Conversions to Affordable Housing

1. Identify Motels and work with owner's and affordable housing managing organizations

12

Rehab Grants and Loans – Small Medium Multifamily

Rehab Grants and Loans – Owner Occupied

Rehab Grants and Loans – Senior Home Repair

Rehab Grants and Loans – Market Rate to Affordable Conversion as Condition of Grant

9

Vacant Home Outreach

1. Use City water records to locate properities that appear vacant
2. Send letter explaining options (Needed repairs? Property management companies for out-of-town owners)

7

Efficiency Improvement - Process Improvement Action Plan (PIAP)/Plan Check Streamlining

1. Public Works and Development Services collaborate to update and improve the development review process
2. PIAP will reflect best practices of small coastal California cities
3. PIAP will involve outreach to building community
4. PIAP will involve performance metrics and a performance baseline

3

Land Availability - Publically Owned Lands Inventory

1. Public parking lots (public parking retained)
2. Marginal park lands
3. County and State owned lands, vacant and underutilized (potential trades)

5

Development Coordination - Small Lot and Conservation Subdivision (Pre-Permitting)

1. Target specific property owners and likely developers (local contractors)
2. 2,000 s.f. minimum lot size in R2 and R3
3. Frontage not required (Alley or Access Easement ok)

6

ADU – Website and Materials

ADU – Financing Resources + Bank Ambassadors

ADU – Education Campaign for Contractors and Realtors

ADU – Marketing Mailer to Property Owners + GIS Suitability Analysis

ADU – Preapproved Plans + Funded Update Schedule

ADU – Prefab Research Report

ADU – Reduced Fees (Impact and/or Building Permit Fees)

9

Affordable Housing - Expedite Permit Processing for Affordable Projects

1. Create process by which all projects that create affordable housing are moved to the top of the stack

7

Purchase Affordability Covenants

1. City uses funds to purchase affordability covenants
2. May appeal to "cash out" property owners because they would retain ownership of their property but would receive a lump cash payment.
3. Some older properties may already rent at near affordable rates

3

Rental Registry

1. Proposed by Heidi Benzonelli
2. Response to dilapidated rental housing and the unwillingness of low income tenants to report substandard housing conditions.
3. Program would tax all income properties in the city to fund a full time building inspector to inspect all rental housing in the city.

9

Put stickers in the blue boxes

Accessory Dwelling Units (ADU)

What is an ADU?

An ADU is small home associated with an existing single-family home. Sometimes called a “second unit” or “mother-in-law unit”.

Could I add one on my property?

Most likely yes. In almost all cases you can add an ADU to a property with an existing single-family home.

Could it be attached to my house?

Yes. There are three ways to add an ADU to your property:

1. Conversion (Convert a garage or divide the existing house into two units)
2. Home Addition (Add the unit onto the house, sharing a wall)
3. Detached (Build a new little cottage in the backyard)

Can I convert a garage?

Absolutely, just make sure you get a building permit.

Do I need to create a parking space for the ADU?

It’s not required, but you can if you want.

Accessory Dwelling Units (ADU)

Brain teaser: See if you can spot the false statement:

The rental income from an ADU can help you pay your mortgage every month. The money will keep coming even if you lose your job.

AARP is a strong supporter of ADUs.

Attached ADUs can be up to 1,200 square feet in size. For example, a home addition ADU.

Detached ADUs can be up to 1,200 square feet in size. For example, a freestanding cottage.

You can convert an existing garage into an ADU.

You don't need to create a new off-street parking space to serve the new ADU.

You can build an ADU above a garage. (Classic space-saving design).

The least expensive way to create an ADU is to convert a portion of the existing single family home.

An ADA accessible ADU can help older folks "Age in place", allowing for more years in the same neighborhood with the same backyard garden.

You can add an ADU to an income property (as long as your income property is a single family home)

You can add an ADU to your property even if it is already a rental property.

It's okay to connect the water, sewer, and electrical utilities into those of the existing single-family home.

You can put a porch on your ADU.

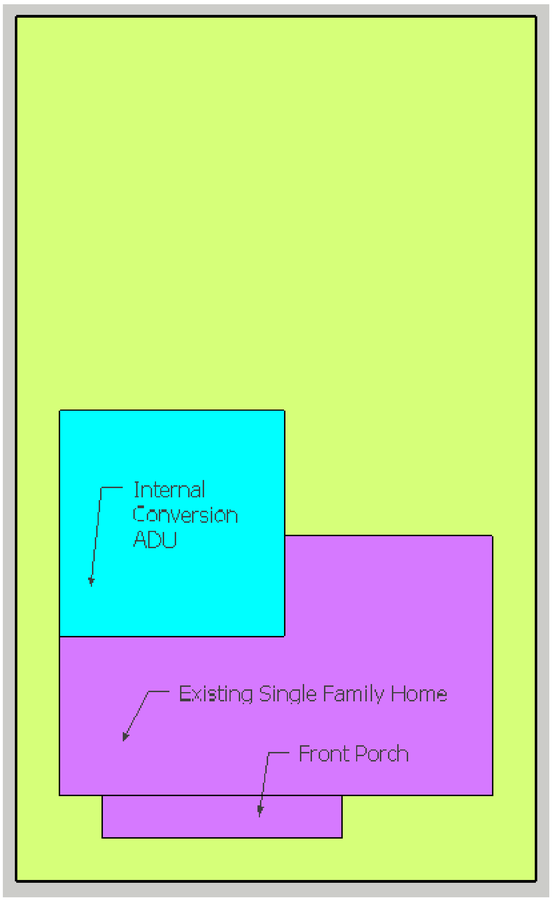
You do not need to get your ADU approved by the Design Review Committee.

It costs roughly $170-200 per square foot for a local contractor to build an ADU. A 400 square foot ADU would cost roughly $76,000.

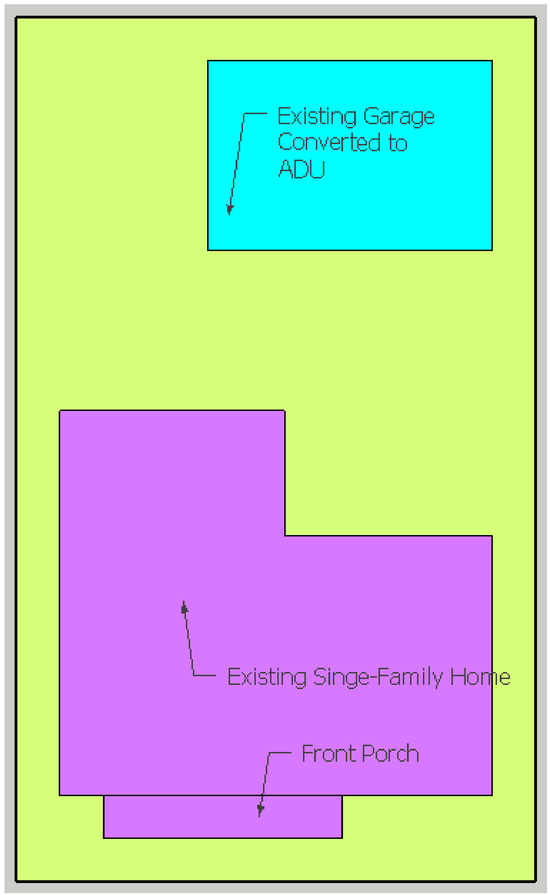
Trick Question! They are all true! (Put this under the flap)

Accessory Dwelling Units (ADU)

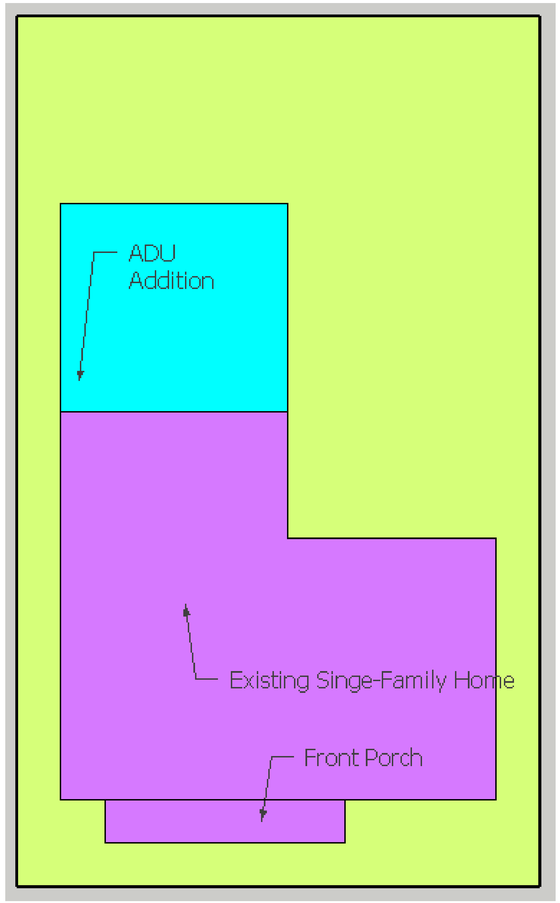
There are four common ways you can create an ADU:



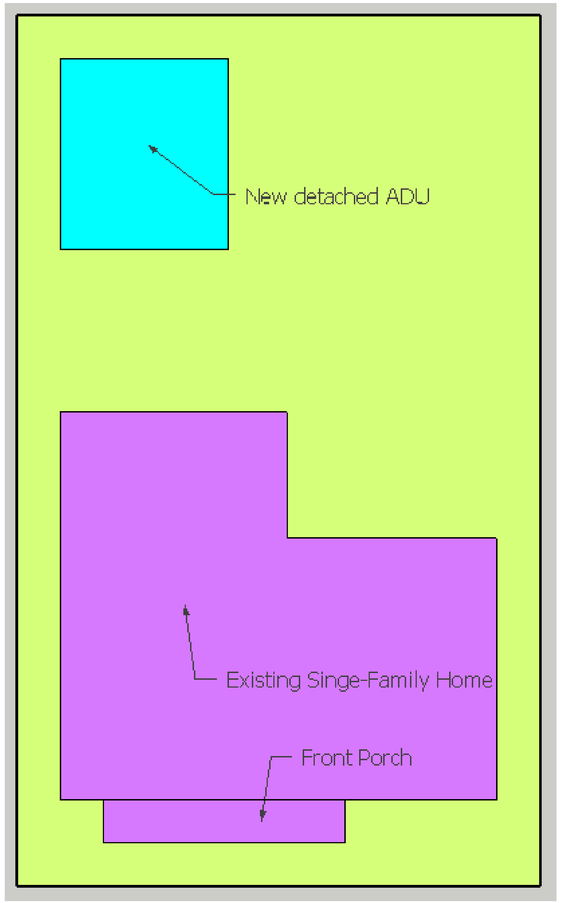
1. Internal Conversion



2. Garage Conversion



3. ADU Addition



4. New ADU Freestanding

Less Expensive ⟷ More Expensive

Accessory Dwelling Units (ADU)

What are your biggest personal obstacles to creating an ADU?

I don’t want a renter living near my house: 1

The planning and building regulations are too confusing: 4

I can’t find a contractor to do the work: 2

I don’t have the cash to do it and I’m not sure I could get financing: 13

A 1,200 square foot ADU just isn’t big enough: 1

Vote with a sticker!

Affordable Housing

Affordable housing is any housing that requires less than 30% of your household's monthly income.

Check out this table to see how your household compares to your fellow Humboldters:

Household Size	Annual Income	Monthly Mortgage or Rent (includes insurance and utilities)	Maximum Home Purchase Price
Extremely Low Income (under 30% of Median Family Income)			
1-Person	$12,600	$315	$32,411
2-Person	$16,460	$412	$46,608
3-Person	$20,780	$520	$58,455
4-Person	$25,100	$628	$69,631
5-Person	$29,420	$736	$81,031
Very Low Income (31 to 50% of Median Family Income)			
1-Person	$21,000	$525	$69,966
2-Person	$24,000	$600	$80,249
3-Person	$27,000	$675	$86,285
4-Person	$29,950	$749	$91,371
5-Person	$32,350	$809	$94,052
Low Income (51 to 80% of Median Family Income)			
1-Person	$33,550	$839	$126,016
2-Person	$38,350	$959	$144,349
3-Person	$43,150	$1,079	$158,432
4-Person	$47,900	$1,198	$171,565
5-Person	$51,750	$1,294	$180,786
Moderate Income (81 to 100% of Median Family Income)			
1-Person	$50,350	$1,259	$191,739
2-Person	$57,500	$1,438	$219,402
3-Person	$64,700	$1,618	$242,874
4-Person	$71,900	$1,798	$265,675
5-Person	$77,650	$1,941	$282,160

Sources: HCD Income Limits, 2018

Affordable Housing

Types of Affordable Housing

Conventional (Deed Restricted)

- For Rent
- For Purchase

Affordable-by-Design

- For Rent
- For Purchase

Conventional (Deed Restricted) vs. Affordable-by-Design

Type	For Rent or Purchase	Income Verification Needed?	Government Subsidy Need to Construct or Operate?	Typical Size of Unit/Number of Bedrooms	Parking Provided?
Conventional	For Rent	Yes, regularly	Yes	600-1,000 s.f. (1-3 bedrooms)	Often
Conventional	For Purchase	Yes, but only at time of purchase	Yes	600-1,000 s.f. (1-3 bedrooms)	Nearly Always
Affordable-by-Design	For Rent	No	No	300-500 s.f. (Studio apartment or 1 Bedroom)	Very Rarely
Affordable-by-Design	For Purchase	No	No	300-500 s.f. (Studio apartment or 1 Bedroom)	Rarely

Affordable Housing

Types of Affordable Housing

Conventional (Deed Restricted)		Affordable-by-Design	
For Rent	For Purchase	For Rent	For Purchase
4	7	11	24

Which of the four types of affordable housing should the City focus on the most?
Put a sticker in the appropriate box(es).

Housing Mismatch

Housing creation benefits all people
AKA "Yes, trickle down housing is a real thing"

Build housing for this group...	...and this is what happens...
High Income Households	You help retain and recruit high skill professional workers such as doctors and engineers. They put their kids in Eureka schools and spend money in Eureka because this is where they live. Middle-income households buy their old houses.
Middle Income Households	You help to retain and recruit middle income professionals and tradespeople such as nurses, teachers, police officers, and plumbers. They put their kids in Eureka schools and spend their money in Eureka because this is where they live. Lower income households buy their old houses.
Low Income Household (Includes Students)	You help to retain and recruit service workers such as hotel maids and retail workers, who are critical for our tourism and hospitality industries. Their kids benefit from improved access to local educational and childcare resources. The short commute means less traffic on the roads and more money in their pockets. Very low income households will upgrade to their old apartments when they can.
Very Low Income Households (Includes people experiencing homelessness)	You provide housing for the most vulnerable and special needs populations within the community. It requires large subsidies to build new housing for this group because they have the least ability to pay, but it's a clear benefit to society to help these people get back on their feet and receive the medical treatment that they need. Because more housing is available, very low income renters have more choice about where to live. They are empowered by the ability to leave substandard housing and are more likely to report unsafe housing.

Housing Mismatch

Case Study: "The reluctant roommates and the frustrated family"
AKA "How building apartments helps families find houses"

Cindy, Tammy, and Pedro are roommates – but they're not happy about it. It was fine back when they were in college but now it's just irritating. They live in a 3 bedroom house that they rent for $1,600 per month – each paying $530. They each want their own apartment, preferably within walking distance of their job and favorite coffee shop. Finding an apartment that suits them, however, isn't easy. They pour through craigslist every week but all they can find are more 3 bedroom houses and shabby 1970's 4-plexes that are located far from downtown.

The Kowalski's are feeling cramped in their 2-bedroom apartment and have started looking to buy their first home. They are shopping for a modestly priced 3-bedroom but are having trouble finding a house in their price range. While they are looking to buy, they would settle for a 3 bedroom house to rent if they can find one in in their $1,300 monthly budget. They can't find either.

PLOT TWIST: A 45-unit apartment building is built in downtown Eureka. Each of the roommates immediately rent their own studio apartment in the new building. They each pay $850 per month. They move out of the house and the landlord starts advertising it. The demand is a little weaker now because the overall supply of housing has increased, so she has to lower the rent to $1,300. The Kowalski's find the house are thrilled. They sign a lease and move in.

Have you ever been a "reluctant roommate" or a "frustrated family"? Write your story on a sticky-note and stick it next to this poster or on the table!

Cindy, Tammy, and Pedro

The Kowalski's

The house

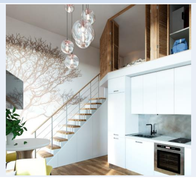
The downtown apartments

Tiny House

So you wanna live in a Tiny House?

What is a Tiny House?

There is no official definition of a tiny house. It means different things to different people. Below you'll find an exploration of the different housing types that might fall into the category of "tiny houses"

Current Options: You can have one of the following right now:	
Really Little Single-family Home. You can build a detached single-family house as small as 250 square feet. It could be site-built or pre-fabricated but would have a permanent concrete foundation.	
Really Little ADU. You can build an ADU as small as 250 square feet. It could be site-built or pre-fabricated but would have a permanent concrete foundation. As an ADU, it would have to be located on the same site as a single-family home and could not be sold separately from the single-family home.	
Bungalow Court with Really Little Bungalows. You can build each bungalow as small as 250 square feet. They could be site-built or pre-fabricated but would have it's own bathroom, kitchen, and permanent concrete foundation. This would be considered a multi-family residential development no different than a 6-plex (if the bungalow court had six bungalows). These are principally permitted in all multifamily zones.	
Shared/Micro Housing with Detached Cottages. You can build multiple small (250 square feet) cottages around a common building containing a kitchen and bathroom. Both the common building and the cottages could be site-built or pre-fabricated but would have to be built with permanent concrete foundations. This type of development is allowed in most multifamily residential and mixed-use zones.	
Mobile Home in a Mobile Home Park. You can live in a mobile home in a mobile home park. Some mobile homes are pretty small. These do not have permanent concrete foundations.	
Micro Apartment Building. You can build an apartment building where each unit is as small as 250 square feet. These could be for rent or for sale, depending on the type of development. The ones with lofts can be pretty hip and typically rent/sell for less than conventional apartments/condos because they are very small and rarely include parking.	

Tiny House on Wheels (THOW)

Tiny House on Wheels (THOW). A Tiny House On Wheels is a wood-framed structure built on a utility trailer, sometimes as small as 100 square feet. They are legally classified as recreational vehicles (RVs) and as such must be licensed by the Department of Motor Vehicles. The water, wastewater, and electrical connections are the same as for RVs. The only place in Eureka that you can currently have an RV is in an RV park. RVs, as *recreational vehicles*, are not legally intended to be used as permanent housing.

Increasing Interest. A Tiny House On Wheels are a hot new topic in the world of housing. Numerous TV shows, websites, blogs, and Youtube channels promote them as a financially liberating and environmentally conscious alternative to conventional housing. Interest is strong in Eureka as well. Over the past few years a good number of people have asked about them at the Planning Department.

Community Concerns and Regulatory Hurdles. As with anything new, there are always questions and concerns that come up. A community needs to look at the potential downsides as well as upsides. The following are questions and concerns that typically come up with THOWs:

- **Legal**. Is it even legal to let people live permanently in THOWs (which are really RVs)?
- **Health/Safety**. Is it safe to let people live in structures that don't have to meet the building codes? What about sewage?
- **Location**. Are the THOWs going to be dispersed around single-family neighborhoods like ADUs or are they going to be concentrated in RV parks (i.e. "Tiny House Villages")?
- **Aesthetics**. What about aesthetics? Can someone live full-time in a 30-year-old Winnebago?
- **Purpose**. Is the purpose of THOWs to create permanent housing or to facilitate nomadic lifestyles for people that want to roam up and down the coast?
- **Social Justice**. How can be sure that allowing THOWs will help the poorest and most vulnerable members of society?

Case Study: City of Fresno

The City of Fresno recently began to allow THOWs as an alternative to ADUs. Here are a few of their regulations:

- Must be registered with the DMV
- Must be built to ANSI 119.2 or 119.5 requirements
- Must have concrete parking pad
- Must have RV water and sewer hookup at pad
- Can't be larger than 440 s or smaller than 100 s.f.
- Must look like a conventional home
- Must have skirt to cover wheels

Source: Fresno Municipal Code §15-2754 and §15-903

Tiny Houses

Do you think we should allow THOWs in Eureka? (Vote with a dot)

Yeah! Let’r rip! ☺	Maybe… Depends on how they are regulated.	No way! Terrible idea.☹
26	2	

Are you interested in any of these other non-THOW tiny homes? (Vote with a dot)

Really Little Single-family Home	Really Little ADU	Bungalow Court with Really Little Bungalows	Shared/Micro Housing with Detached Cottages	Mobile Home in a Mobile Home Park	Micro Apartment Building
16	15	20	16	8	9

Vacation Rentals

What are they? Vacation rentals are residential properties that are rented to vacationers or travelers for periods of less than 30 days.

Background: Vacation rentals have been around for a long time. They have traditionally provided an alternative to hotels for people who planned to stay for longer periods of time (e.g. 10 days), or for visitors needing extra space (e.g. family reunions). They were typically only located in areas of extraordinary touristic value, such as beachside or picturesque old towns. With the advent of smart phone apps and the sharing economy, it became very easy for anyone to rent out their residence to travelers. Changing consumer expectations meant that it a broader range of people were interested in "vacation rentals", such as solo travelers or people that only needed to stay for one night. Parallel to the rise of the rise of short term vacation rental came the housing shortage, which meant that housing in general is not as plentiful or affordable as the people of Humboldt need. The concern is that if a residence is being used to serve vacationers is no longer providing housing to locals, which can be a problem. The City of Eureka recognizes the need to balance these two important topics.

Pros	Cons
1. Supports tourism economy (Visitors are likely spend money near their lodging) 2. Economic security for home owners (Can generate "on-demand" income in times of economic stress) 3. Shows off Eureka's beautiful neighborhoods (Something most hotel-based visitors don't see)	1. Reduces available housing for local workforce 2. Lower housing supply tends to drive up rents

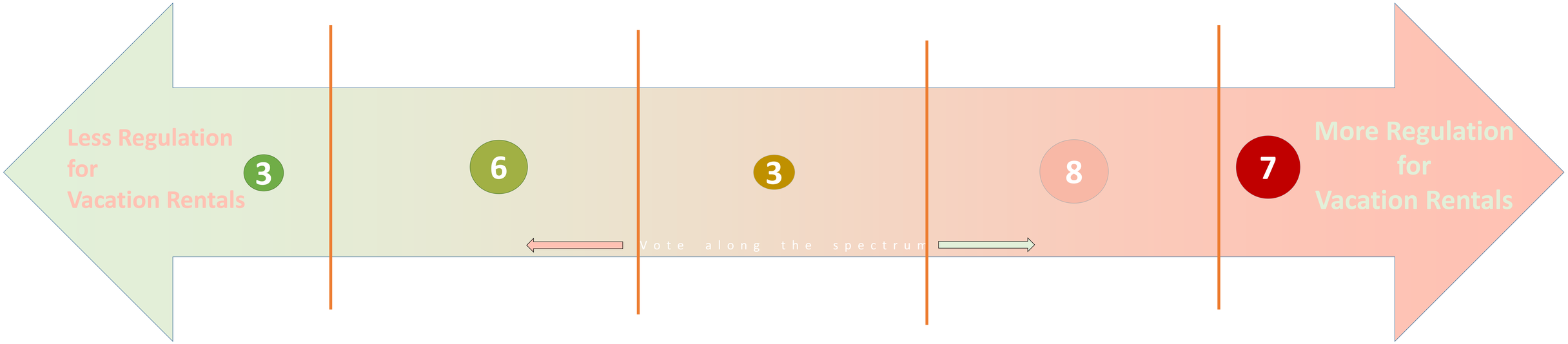
Proposed City Regulations: (Three options)

1. **Single Room**: You live in your house and rent out a room. All you need is a business license. Easiest option.
2. **Multiple Room**: You live in your house and rent out up to 8 rooms. Think bed and breakfast or hostel. You need a minor use permit for this approval. Second-easiest option.
3. **Entire Unit**: You *don't* live in your house and you rent it out to visitors. You need a minor use permit for this approval. The total number of permits is capped by City Council to limit the impact to the housing supply. This is the least easy option.

Note: These regulations don't apply in mixed-use zones like Downtown or Old Town. In those zones there are no special permits or caps. They are regulated the same as hotels.

Vacation Rentals in Residential Zones

What's your attitude about vacation rentals in residential zones in Eureka? Place a dot on the spectrum.



Less Regulation
"Let people do what they want. The more the merrier. Vacation rentals aren't hurting anything."

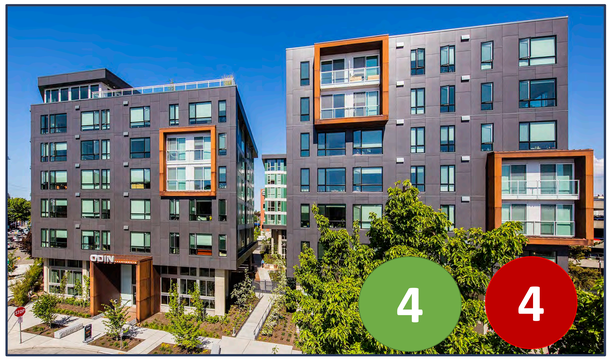
More Regulation
"Vacations rentals are a major threat to Eureka's housing supply and/or neighborhood tranquility. I want strict limits or an outright ban. "

Other Thoughts? Jot them down in the space below:

- Need more regulations as units grow
- I have lost multiple homes to Airbnb!
- Limit rental period to +30 days
- Vacation rentals are empty houses most of the year that would be meeting Eureka's housing needs but aren't. Additionally nobody needs a vacation home, but everybody needs a house… a home.

EUREKA HOUSING WORKSHOP – April 10, 2019

Eureka's future multi-family housing developments need to look… = More like this = Not like this



Big Idea Board.

Have a big idea for housing in Eureka?

Draw it, write it, or diagram it here:

- Copy existing units at Eureka Housing Authority Senior Units, i.e. 942 G St. – Excellent floorplan
- If sea level rise puts Eureka under water some day, having a lot of housing will be the least of our problems. Build/develop as much and as high as possible in Old Town. Lots deal with the issue we do have now.
- Banks help finance tiny homes in backyards. Rent goes to pay loan until loan paid off, then tiny house becomes homeowners to rent. **
- Tiny house villages where you get to help build the tiny house and you eventually own the tiny house *
- CAVCO houses (cabins) like Sandpiper in Arcata on city-owned parking lot on Myrtle now domes. Could fit 10 or 12, ½ face marsh across Myrtle, ½ face new trail that goes to McFarland. Home ownership! Under $100,000 maybe. Look into it!!!
- Require/incentivize small/micro-farms, community gardens, and food forests! *
- More rules for rental agencies – to allow tenants with mid-low credit rating
- Environmental impacts lessened (more eco-friendly materials/building practices) and sea level rise-proof housing
- Incorporate ideas from local native traditional architecture in new houses
- Real estate investors are driving up the price of all homes by concentrating ownership with a few wealthy people. They drive the economy while simultaneously pulling the resources of the middle class. This is a major driver of homelessness, foreclosures, and housing insecurity.
- Communal housing (like the proposed veterans center in the slideshow) for the general public
- Convert commercial buildings to accommodate upper level apartments or upper level/back area condos and lower level stores
- Access to the waterfront and parks for all residents

EUREKA HOUSING WORKSHOP – April 10, 2019

In the space below, write answer to the questions about housing Eureka…

What is good about housing in Eureka?	What are the biggest challenges about housing in Eureka?	What are the top two things you change about housing in Eureka?
• Less expensive • We could always be Arcata • Neighborhoods • Trees • Historic Buildings • Bay • Old town • Small city • Walkable • It's old and beautiful • Very diverse • Lots of yards and valuable greenspaces	• Affordability *** • Zoning • Down payment • Being on a fixed income and finding something affordable and decent to live in • Landlord/rental agency relationship with potential tenants • Houses with mold and rats are almost affordable, but houses without them are not • Mental health supports to help the housed stay housed • Lack of "ready to upgrade" homes • Airbnb • Rundown • Roads and sidewalks aren't maintained • PG&E lines are messy and make it look sad	• Zoning • Property tax incentive to build ADU • Incentivize sale of homes under 20k to low low income people • There should be more services and shorter waiting lists for lower or fixed income citizens • Allow tenants with less than stellar records to rent homes • More available housing/fewer vacation rentals • More maintenance/updating (to fit codes) for old houses; they are good homes and many are empty due to missing floorboards and the like • Multi-family/tiny houses. Big Victorians can be multifamily. A vacant lo can house tiny houses on wheels and van houses. • More public investment in housing • Better leverage of shelter crisis designation • Mixed use/ mixed income developments are awesome! Include parks and community meeting space! • Stop slum lords

Housing Conditions and Code Enforcement

Have thoughts on this topic?

Draw it, write it, or diagram it here:

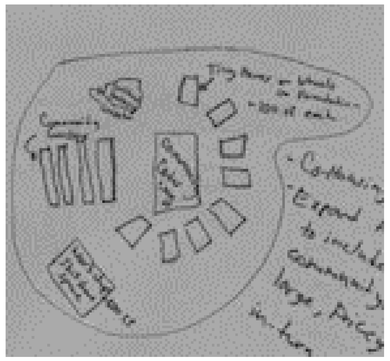
- Slum lords!
- I like living in city owned property (senior apt) because my tenants rights are protected
- Too many wonderful old houses are destroyed by mold an rats. Mold kills creatures (it killed my parakeet). Maintain old houses and we won't need as many new ones. Use nay empty building you can before building new!
- Commercial buildings allowed to stay vacant bring down property value and weaken spirit & cohesiveness of community. Let's put an end to incentivizing vacant propertied and those that are allowed to fall into disrepair. *
- Protection for renters who complain about substandard housing!!! (I lost an apartment this way)
- Mold!
- It would be nice if low income did not equate to living in squalor (rats, roaches, etc.)
- Code enforcement rocks!
- Collaboration between City and County
    - Shared resources
    - Identify common goals
    - Subsidies to improve housing conditions
- Be nice!

Housing Insecurity and Homelessness

Have thoughts on this topic?

Draw it, write it, or diagram it here:

- Need to create more emergency housing that's free. Like Betty Chinn Village, but more villages with less restrictions
- Take old RVs, teach construction skills, have people create their own homes
- Build tiny houses
- Shared housing throughout the County
- Lower property taxes if ownership builds 2nd unit
- Everyone deserves a home
- Allow Van/bus/tiny house on wheels*
- Housing programs for homeless/at risk folks
- Redefine zoning designations to to include temporary lots for mobile dwelling units (vehicle, RV, tiny home)
- Safe camping is needed in the interim while we wait for affordable/permanent housing
- Explicitly address housing for people without jobs or who can only find minimum wage, part-time jobs. This presentation did not address this at all! *
- Expand the definition of zoning to include options that strengthen community rather than benefit large, pricey development that in-turn requires large rent
- Cohousing has many forms.



Eureka Police Department, Community Services, and DHHS

Mock Real Estate Listings

This stations shows ten mock real estate listings.

Place a dot on any property that you would be interested in renting or buying.

- $800/mo. For 400 sq. ft. is out of reach for most people who need this kind of housing
- Seniors need at least 1 bedroom, ground floor – no entry stairs, include ADA shower etc. in order to downsize - Elevator option but notoriously expensive to maintain and is a problem when not functional.

Other thoughts to share? Write them down here ↑

Brand New Micro Apartments for Rent

Location: 300 G Street (behind Mazzotti's)
Monthly Rent: $800 (water included, gas and electric excluded)
Apartment Description: 400 square feet studio apartment with big windows generous balcony
Parking: No dedicated space (City parking permit available for $50-100 per month)

This 45-unit apartment building was completed in late 2019. Located right in the heart of Old Town it is within walking distance of numerous shops, restaurants, and many large local employers. The waterfront/bay trail passes just blocks away, offering a direct bike route to HSU. Secure bike parking included on ground floor. Major bus routes are located just one block to the south. Call for a showing today!

Fogtown Realty
"Your new home will fit you better than your favorite pair of pants. We guarantee it."

Two New Skinny Houses for Sale

Location: 2004 C Street
Price: $275,000 each
House Description: New Construction 1,500 s.f. 3-bedroom 2-bath single-family homes
Lot: 3,000 s.f. (30' wide and 100' deep)
Parking: Carport (accessed from alley)

Two brand new homes, identical except for exterior facades. Each detached single-family home occupies its own lot and is eligible for conventional financing (i.e. *this is not a condominium*). Inspired by the row of homes at 12th and J Streets (photo right), the developer decided to split the lot into two long skinny parcels and built two long skinny homes.

New Alley House for Sale

Location: 1110 L Street
Price: $225,000
House Description: New Construction 750 s.f. two-bedroom one-bath single-family home
Lot: 2,000 s.f. (Alley access only – no frontage on L Street)
Parking: 1-Car Parking Pad
Completed in November 2019, this cute little bungalow would be a great starter home or ideal for a couple of ready-to-rumble retirees. The lot was split off a larger lot in 2018, where it previously served as a large grass backyard. The yard is small but ample-size for a vegetable garden and letting Little Poochy out for a piddle.

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New House in Conservation Subdivision

Location: 1305 Vista Drive
Price: $700,000
House Description: New Construction 2,800 s.f. 6-bedroom 3-bath single-family home
Lot: 3,000 s.f. buildable + 1.8 acres of conservation easement
Parking: 2-Car Attached Garage
Move-in-ready home in new conservation subdivision! The home occupies .07 acres (3,000 sf) of a 1.87-acre lot. Most of the lot is steeply wooded gulch and is covered by a conservation easement. The conservation easement can never be logged and no buildings or roads can be built inside it. The home is set very near the street. It has a large deck and beautiful views but effectively no yard. The conservation easement contains a private walking path. Call today for a showing!

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Row House Condo for Sale

Location: 1621 E Street
Price: $300,000
Condo Description: 1,600 s.f. 3 bed 2 bath (Kitchen and living on 2nd fl, bedrooms on 3rd fl.)
Parking: 1-Car Garage (accessed from alley)
This 4-unit condominium was completed in early 2020. Conveniently located in Midtown Eureka, it's within easy walking distance of both Old Town and Henderson Center. High grade finishes throughout. No yard, but it does have a 300 s.f. roof deck. Great option for someone who prefers traveling to yard work!