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:

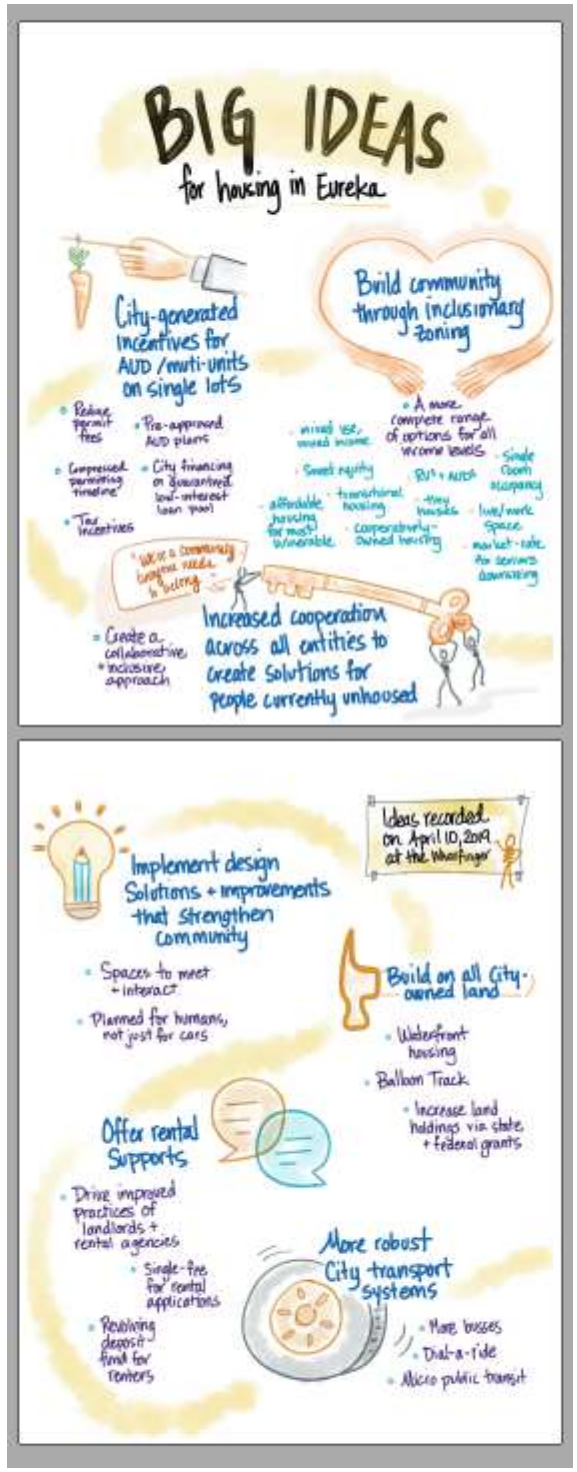
- 1990, 2000, and 2010 Census
- City Building Permit and Planning Permit data
- Utility Data
- American Community Surveys (ACS) 2012-2016
- California Employment Development Department, Occupational Employment Statistics
- Humboldt Association of Realtors
- Northern California Association of Home Builders
- 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 included in this document.

The City conducted two public, joint Housing Element 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 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. Redwood Communication Action Agency (RCAA)

Needs Assessment

Community Context

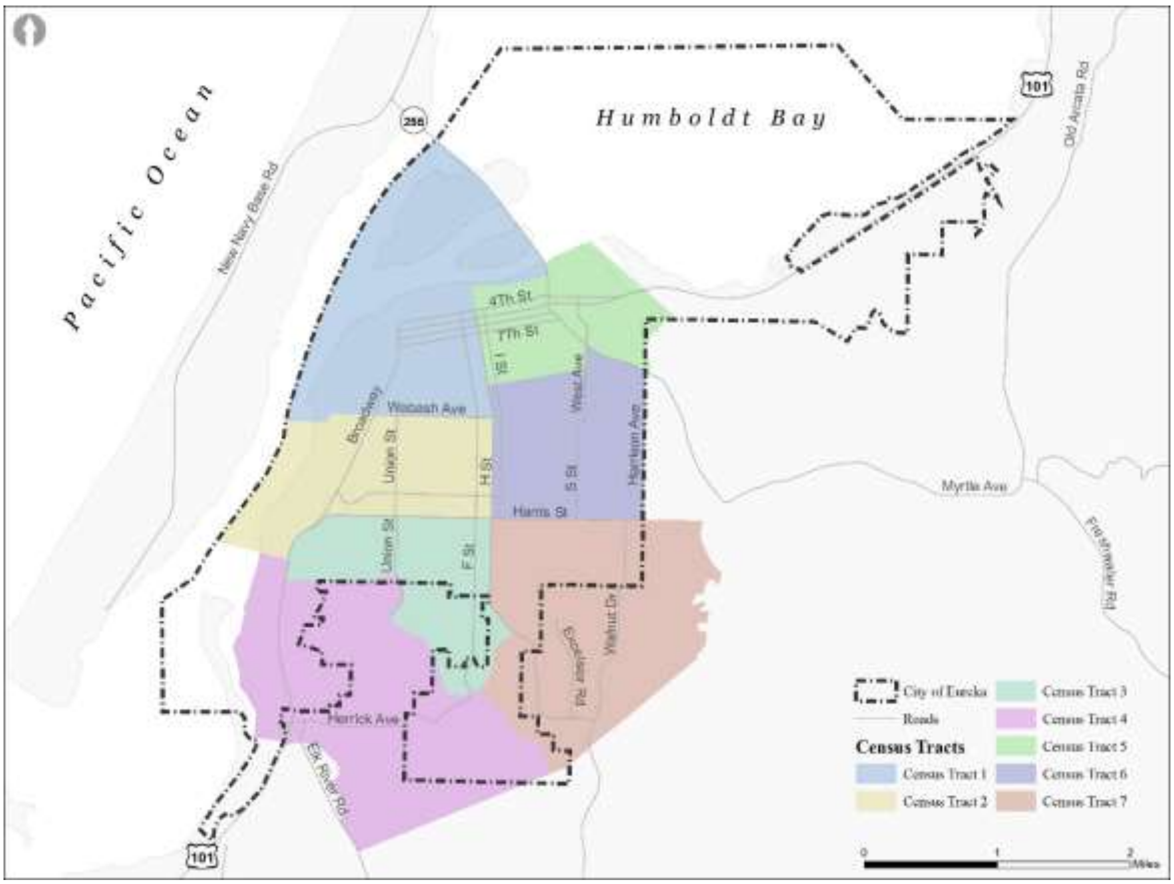
To analyze patterns and trends in Eureka, it is useful to divide the City into smaller geographical subareas. The City is comprised of seven census tracts, described here by unofficial neighborhoods. It is important to note that Census Tract boundaries do not exactly follow the Eureka City limit boundary; 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 includes Indian Island, Woodley Island, and portions of Old Town Eureka and a portion of the City's industrial districts.
- **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 14th 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.

Figure 1 Census Tract Boundaries



Population Characteristics with Trends

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

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 several 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%

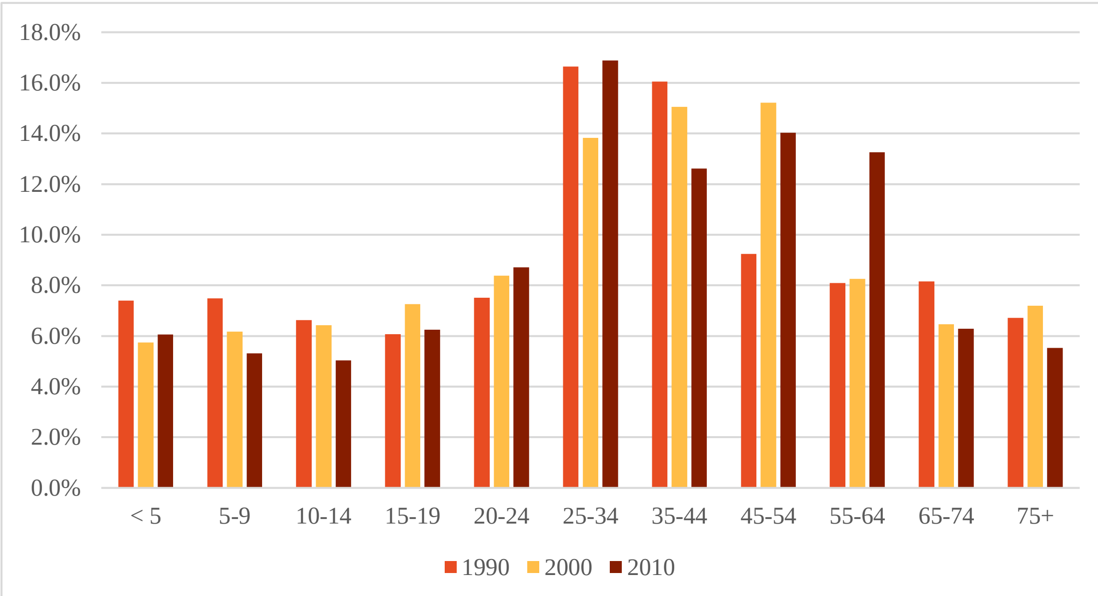
Sources: Bureau of the Census, 1990, 2000, and 2010 Census, 2012-16 ACS 5-year estimates.

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 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 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 which has increased from 8 percent to almost 12 percent since 2000 (**Table 2**). The Asian population has increased 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	Total Eureka	% of Foreign Born Population (Eureka)	% of Total Population	Total 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. The 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 which had 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.

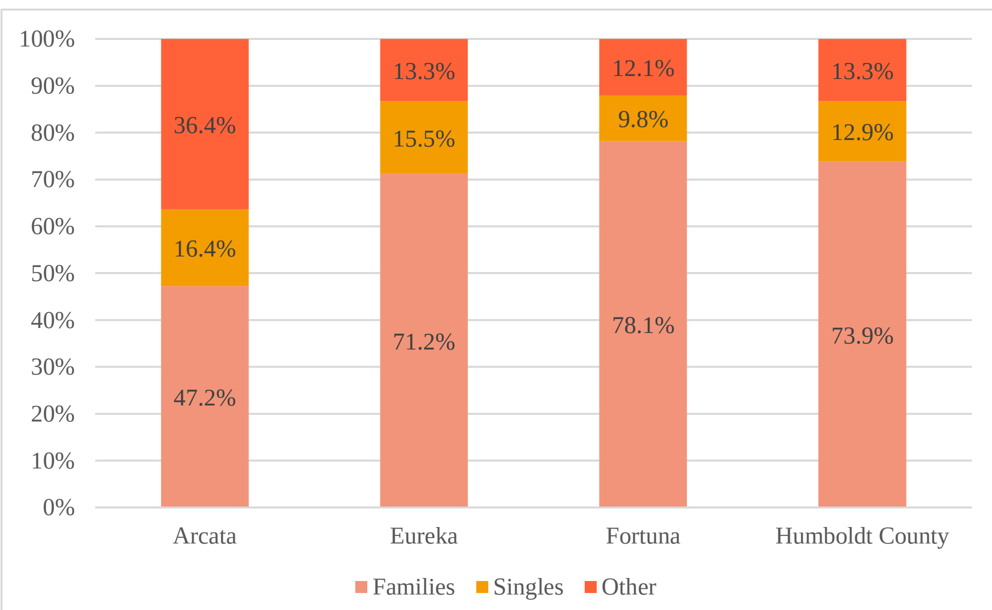
Population in Households

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 population growth. A City's average household size is also an indicator of the character 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 in size 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 one- and two-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, but 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 3.5 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 -- thereby 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

	Eureka					
Occupation	**#**	**%**	**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 wages in 2016 for the Humboldt County North Coast Region show that management and professional occupations were 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 (see **Figure 1**) had the lowest median income in Eureka. The western tracts had the next lowest median income, but relatively close to the County's Median Household Income, (**Table 11**). The Eastern areas of the City (Tracts 6 and 7) had the lowest poverty rate and the highest median incomes in the City.

Table 11 Income by Neighborhood - Eureka

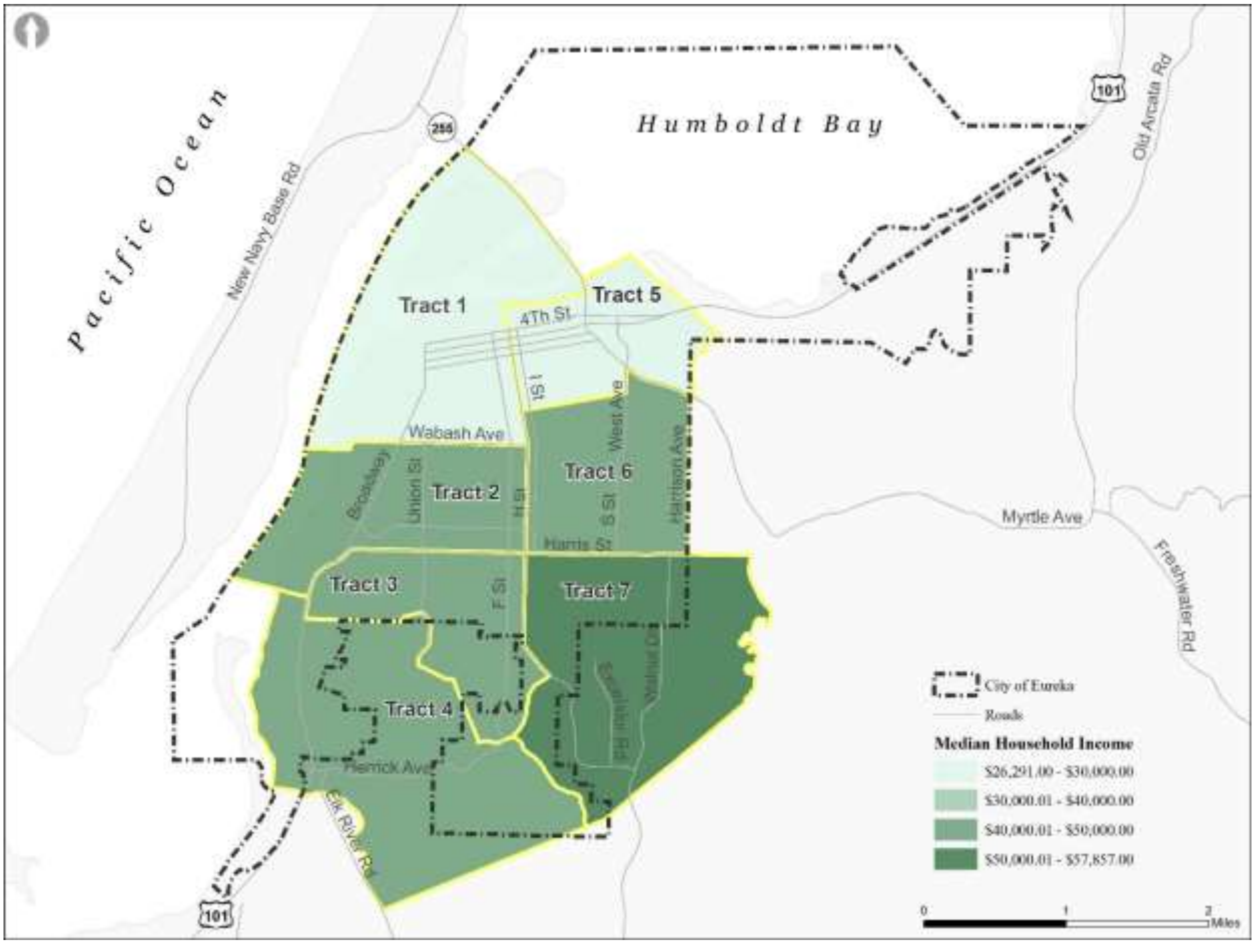
Income Category	Tract 1	Tract 2	Tract 3	Tract 4	Tract 5	Tract 6	Tract 7
Median Household Income	$26,291	$41,936	$42,983	$42,708	$28,175	$48,208	$57,857
% of County Household Median	62.3%	99.4%	101.9%	101.2%	66.8%	114.2%	137.1%
Median Family Income	$35,587	$52,993	$45,435	$46,538	$31,585	$58,685	$82,868
% 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 a 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**).

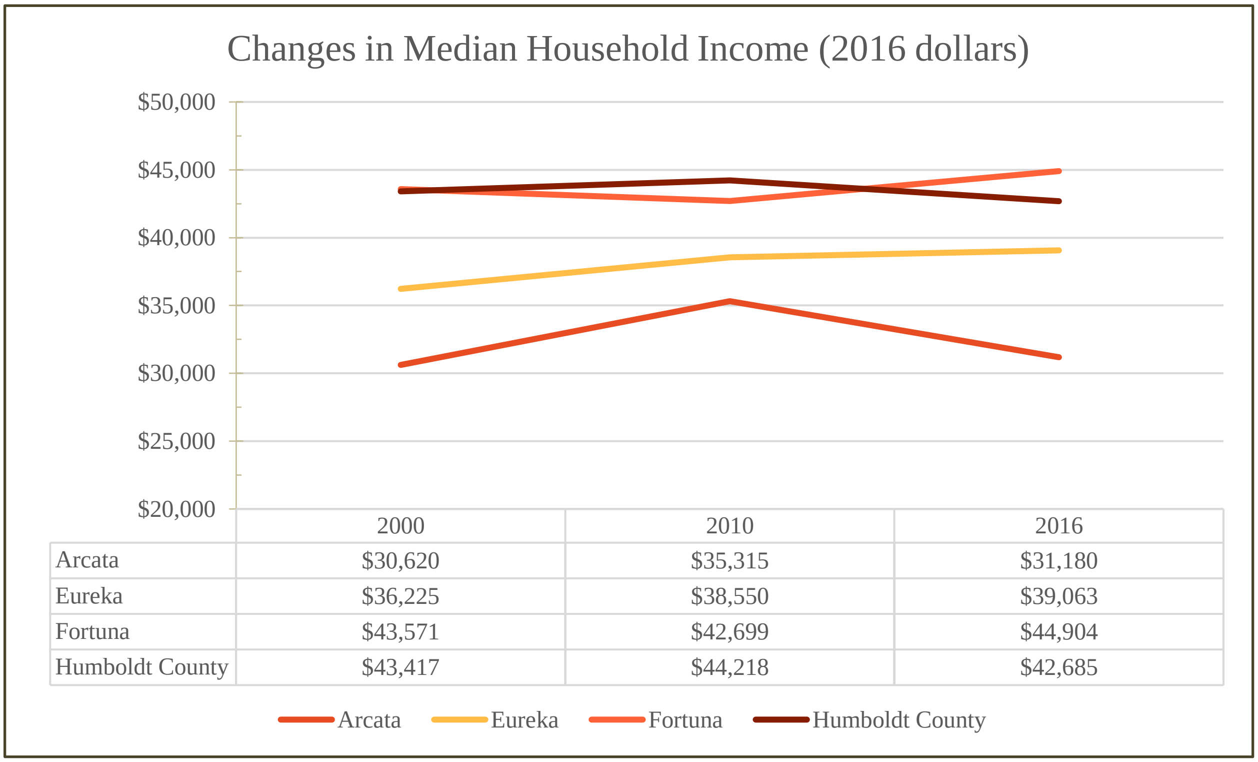
Figure 4 Median Household Income by Tract



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



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, or 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	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 owner-occupied 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 disabled 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 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. 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., Many of the mentally ill are homeless, and according to the RAVEN Project, a youth-led, youth-implemented street outreach program of the Youth Service Bureau of the Redwood Community Action Agency, it is estimated there are between 200 and 400 homeless youth 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 live a full life. 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”. These land uses are defined specifically as “a state-licensed residential facility that provides non-medical social and personal care for residents. Also included are 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 is often 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.

Farm Workers

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 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 Housing Costs and 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:

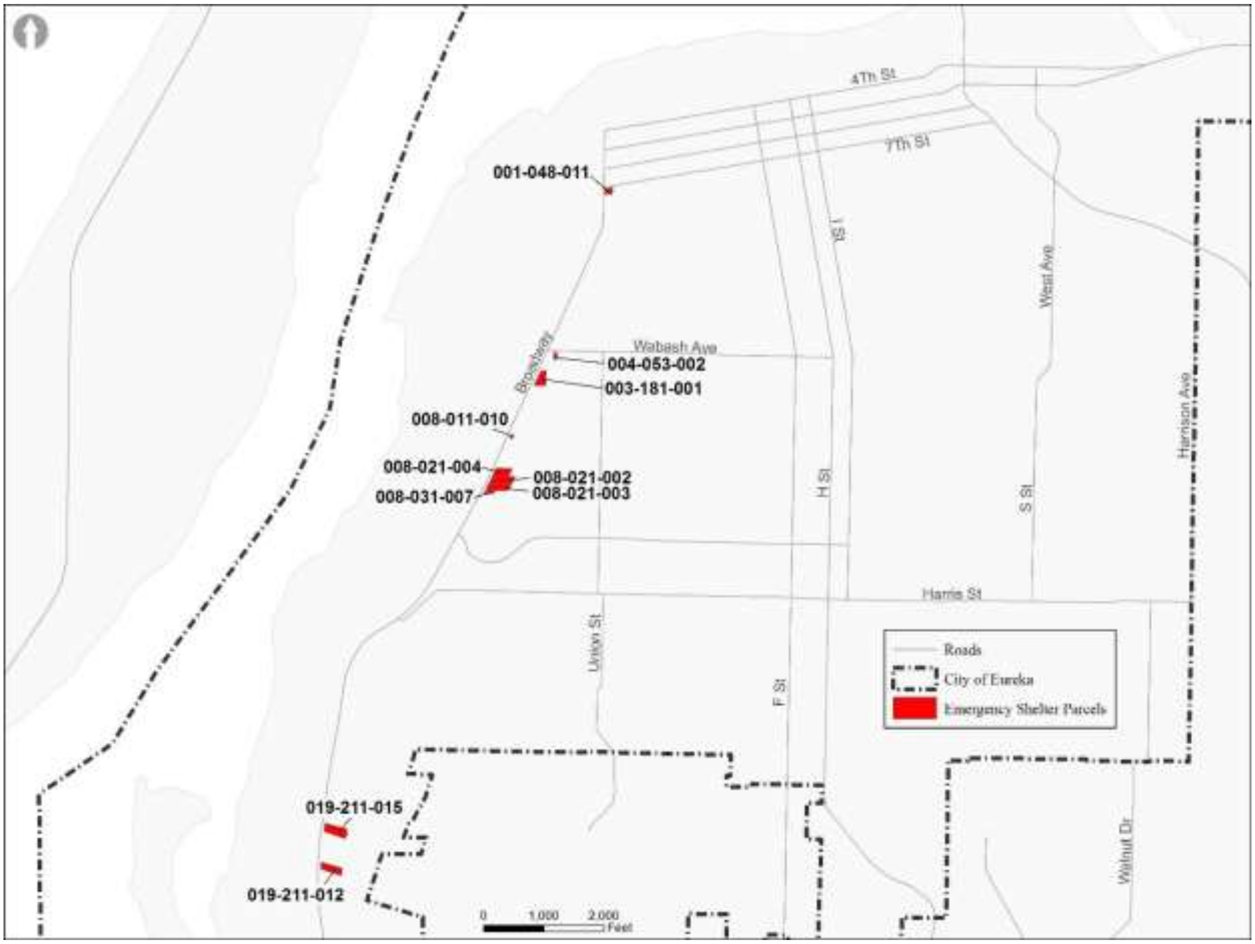
- The lack of housing affordable to very low- and low-income persons;
- Increases in unemployment or under-employment;
- Reductions in government subsidies;
- Deinstitutionalization of the mentally ill;
- Domestic violence;
- Drug addiction; and
- Dysfunctional families.

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, 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), zoning district. **Table 19** lists a sample of 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
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
019-211-012	41,400	188	4255 Broadway	Motel
019-211-015	54,000	245	4033 Broadway	Motel
Total	**7.75 (Acres)**	**1,316**		

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, an apartment, or a 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
Single-Family Residential	Loss	Demolition	-1	-2	-1	-1	-4		-2	-2	-1	-14
Single-Family Residential	Loss	Loss via Conversion to Nonresidential Use										0
Multifamily Residential	Gain	New Construction			20	4	11		4			39
Multifamily Residential	Gain	Created via Conversion						50		1		51
Multifamily Residential	Loss	Demolition								-4	-4	-8
Multifamily Residential	Loss	Loss via Conversion to Nonresidential Use										0
Accessory Dwelling Unit (ADU)	Gain	New Construction			3	4	1	1	2	2	2	15
Accessory Dwelling Unit (ADU)	Gain	Created via Conversion	1	4		1	1	2	1	6	6	22
Accessory Dwelling Unit (ADU)	Loss	Demolition			-1	-2		-1			-1	-5
Accessory Dwelling Unit (ADU)	Loss	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 is based on California Department of Finance reporting categories.
Source: City of Eureka Building Permit Records

Between 2010 and 2018, 124 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. One large Low Income Tax Credit project was created during this time, representing 50 deed-restricted low-income units each. Excluding this uniquely large projects, Eureka has produced an average of 9 dwelling units per year from 2010 through 2018.

Table 22 through **Table 26** 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

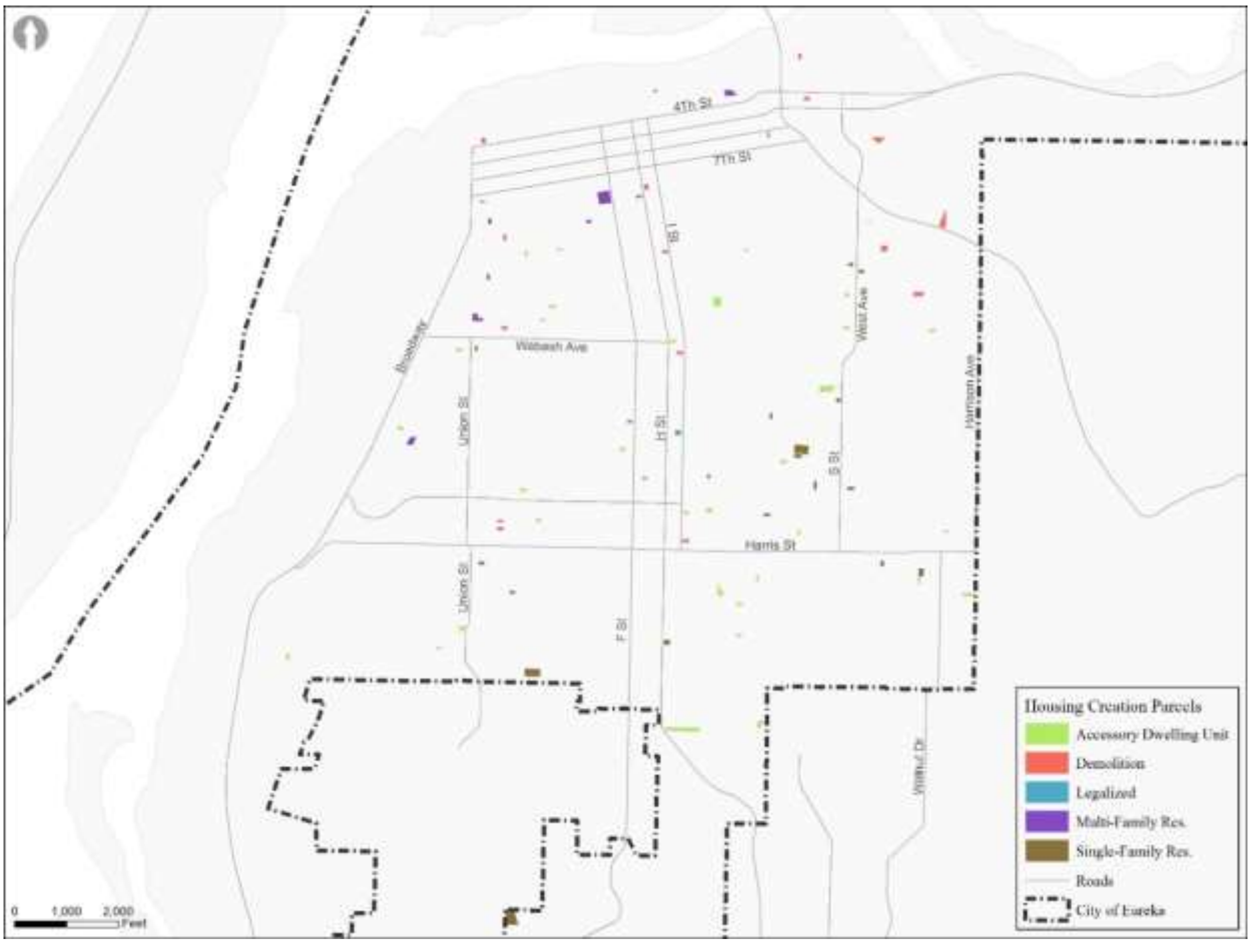
Source: City of Eureka.

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.

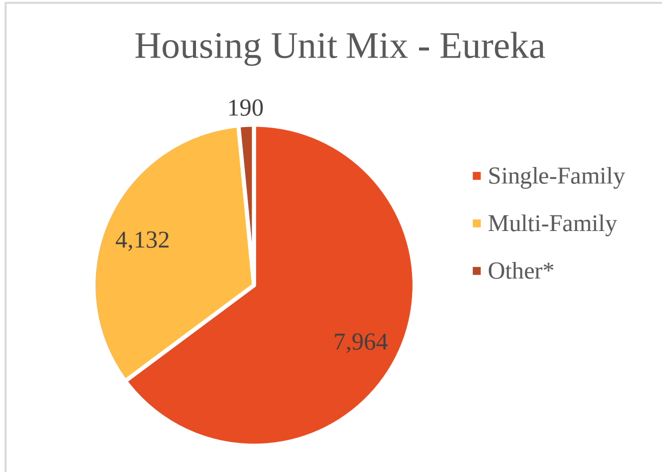
Figure 7 Map of Housing Creation 2010-2018



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 were available, as it excludes units that are 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, this use is conditionally permitted and a cap on the maximum number of full unit vacation rentals in residential zones will be imposed by the 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 will not be 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.

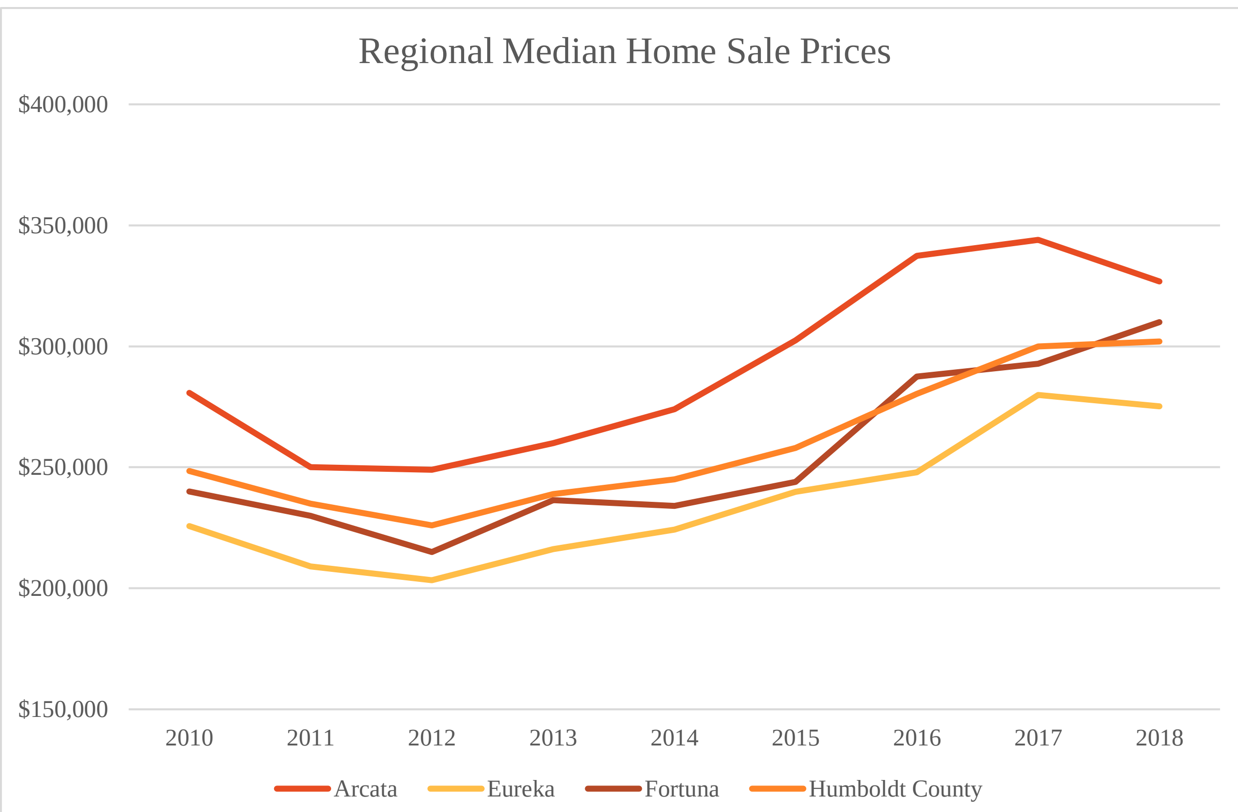
According to the Census, a majority (58 percent) of owner-occupied housing stock is valued between $200,000 and $400,000, with a large number of units (22 percent) valued between $200,000 and $250,000. Only a small number of units (10 percent) were valued below $150,000.

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	Annual Income	Rental	Ownership	Utilities	Taxes and Insurance	Affordable Rent	Affordable Home Price
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

		Affordable Costs		Housing Costs			
Household	Annual Income	Rental	Ownership	Utilities	Taxes and Insurance	Affordable Rent	Affordable Home Price
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. Fortunately, Silvercrest Residence has confirmed that the affordability covenants have been extended to 2035, and are so noted in **Table 38**. Generally, these developments or rehabilitations were financed using HOME, CDBG, LOCAL funds, and/or the City of Eureka's Redevelopment Agency Low- and Moderate-Income Housing Fund (LMIHF). Additionally, all the ownership units, as well as the recently rehabilitated Eureka Housing Authority sites 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 to 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 within 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** (Vacant Sites) and no sites 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** and **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 four 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 and 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 foot infill parcel proposed to be subdivided into three 2,000 square foot 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 June 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 inland Zoning Code to ensure consistency with the requirements of Senate Bill 2, permitting emergency shelters by right within the Service Commercial (SC) and 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 Development Services 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, Development Services Department 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.

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 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 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	$695
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	$920 (waived)

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

Service	Fee
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
Impact Fees		
Sewer	$13,692	$3,423
Water	$8,021	$3,208
Fire	$2,208	$701

	Quadplex	Single-Family Unit
Total	$40,603	$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 Eureka, 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 Bay Municipal Water District (HBMWD) 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 952 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 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 developed lots (non-site-specific) that might 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 unit 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 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 an 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 the income thresholds for Very Low Income for one-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 newly constructed 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 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 less feasible. 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 13 percent (20 units) Above Moderate Income, 59 percent (94 units) Moderate Income, 19 percent (30 units) Low Income, and 10 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 of 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.. 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 foott 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 a 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 be 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 on 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 will 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	55	314	**757**
Total Targets	**310**	**170**	**303**	**454**	**1237**
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** and **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				83
	001071001	13,163	DT					
	001071002	13,033	DT					
2	Site 2 (Seventh and Myrtle)	32,854	R2	36				22
	001261020	32,854	R2					
	001261022	37,047	R2					
3	Site 3	16,687	BD-CZ[1]				8	21
	002081005	6,282	BD-CZ					
	002121002	6,515	BD-CZ					
	002121003	3,890	BD-CZ					
4	Site 4	9,416	BD-CZ[1]				4	19
	002083001	5,961	BD-CZ					
	002083002	3,454	BD-CZ					
5	Site 5	14,296	BD-CZ[1]				7	21
	002095005	6,598	BD-CZ					
	002095006	7,697	BD-CZ					
6	Site 6	37,056	R1			5	5	12
	010261015	7,350	R1					
	010261022	6,766	R1					
	010261021	22,940	R1					
7	Site 7	19,366	R2				10	22
	009021001	12,697	R2					
	009021015	6,669	R2					
8	Site 8	8,055	Multiple				4	22
	009171032	1,859	R2					
	009171033	2,032	R2					
	009171034	3,718	R2					
	009171035	446	NC					
9	001042008	3,319	DW				2	26

[1] The City of Eureka is in the process of updating the certified Local Coastal Program, and intends to propose these zoning designations in the Update. The current certified zoning designation for these parcels is CS (Service Commercial).

Site	APN	Area (sf)	Zoning	VLI	LI	MI	AMI	DU/AC
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[2]				3	40
16	002053001	13,192	BD-CZ[2]				10	33
17	002071002	3,299	GN-CZ[2]				3	40
18	002071004	7,199	GN-CZ				7	42
19	002101002	6,598	GN-CZ[2]				6	40
20	002101010	6,654	GN-CZ[2]				6	39
21	003141001	7,790	CS-CZ[2]				8	45
22	007094002	6,637	CS-CZ[2]				6	39
23	302171041	19,863	CS-CZ[2]				19	42
24	302171040	24,815	SC				19	33
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

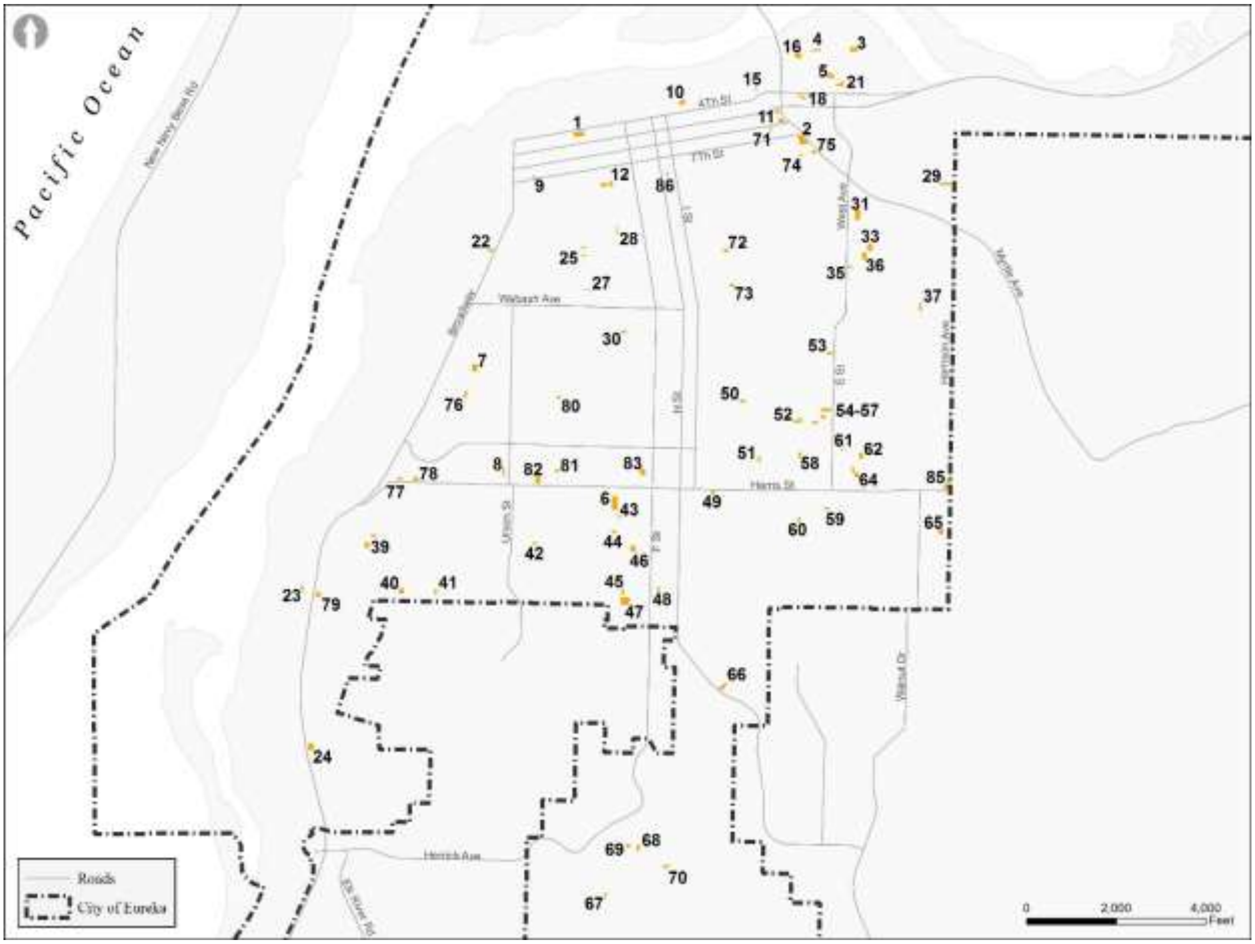
[2] The City of Eureka is in the process of updating the certified Local Coastal Program, and intends to propose these zoning designations in the Update. The current certified zoning designation for this parcel is CS (Service Commercial).

Site	APN	Area (sf)	Zoning	VLI	LI	MI	AMI	DU/AC
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	11
46	010292005	19,980	R1			3	3	13
47	010281034	16,290	R1			1	1	5
48	010293023	34,458	R1			5	5	13
49	011111002	6,498	R1			1	1	13
50	011186001	7,871	R1			1	1	11
51	012036009	7,366	R1			1	1	12
52	012056008	6,679	R1			1	1	13
53	012131009	13,262	R1			1	1	7
54	012141031	7,739	R1			1	1	11
55	012162006	8,014	R1			1	1	11
56	012162008	8,790	R1			1	1	10
57	012162003	8,788	R1			1	1	10
58	012171009	7,194	R1			1	1	12
59	012191007	6,880	R1			1	1	13
60	012213010	6,368	R1			1	1	14
61	012221015	5,288	R1			1	1	16
62	013044006	3,611	R1				1	12
63	013053006	12,075	R1				1	4
64	013055002	6,969	R1				1	6
65	013055005	10,437	R1			1	1	8
66	013201073	14,039	R1			1	1	6
67	018152019	14,323	R1			1	1	6
68	301031030	5,265	R1			1	1	17
69	301231021	10,347	R1			1	1	8
70	301231032	7,164	R1			1	1	12
71	301281038	8,222	R1			1	1	11
72	001253003	4,066	R2				1	11
73	005122004	7,528	R2			1	1	12

Site	APN	Area (sf)	Zoning	VLI	LI	MI	AMI	DU/AC
74	006011001	2,836	R2			1	1	31
75	006012001	6,550	R2			1	1	13
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
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	21
86	005012002	4,400	R3				4	40
	Totals			**86**	**0**	**55**	**314**	

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	006181001	18,286	NC	City Parking Lot - Sunny & Myrtle	15	5			48
2	001155005	14,668	DT	City Parking Lot - 8th & G	15	5			59
3	Site 3	13,200	DT	City Parking Lot - 6th & M	15	5			66
	001233007	6,600	DT	City Parking Lot - 6th & M					
	001233006	6,600	DT	City Parking Lot - 6th & M					
4	Site 4	12,600	DT	City Parking Lot - 3rd and E (Visitor's Center)	10	10			69
	001096003	6,000	DT	City Parking Lot - 3rd and E (Visitor's Center)					
	001096002	6,600	DT	City Parking Lot - 3rd and E (Visitor's Center)					
5	001103003	13,200	DW	City Parking Lot - 5th & D (Next to Lloyd Building)	15	15			99
6	001142007	17,600	DT	City Parking Lot - 4th & G (Across from Arkley Ctr.)	15	10			62

Site	APN	Area (sf)	Zoning	Notes	VLI	LI	MI	AMI	DUAC
7	001142005	13,200	DT	City Parking Lot - 5th & H (Next to Banana Hut)	15	5			66
8	006021006	19,792	P	Portion of Cooper Gulch Park	15	5			44
9	001192001	13,200	DT	City Hall Parking Lot - 5th Street	15	5			66
10	001192004	13,200	DT	City Hall Parking Lot - 6th Street	15	5			66
11	008112031	7,300	R2	Broadway & McCullen (DOT surplus)	7				42
12	Site 12	111,308	P	County Owned - Sheriff's Woodlot	40	40			31
	013101006	27,933	P	County Owned - Sheriff's Woodlot					
	013111003	83,375	P	County Owned - Sheriff's Woodlot					
				Totals	192	110			

Source: City of Eureka

Figure 11 Non-Vacant Sites

Source: City of Eureka.

Parking Lot Apartments Rendering

Parking Lot Apartments – Sample Upper Floor Layout

Site 1 (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 a large bus shelter immediately adjacent to the 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 48 du/ac. This is consistent with the adjacent R3 zone. This site will be targeted for development via Implementation Program H-34.

Site 2 (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 59 du/ac. This site will be targeted for development via Implementation Program H-34.

Site 3 (6th and M Parking Lot) This site is a 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. Although the average utilization rate of the lot is 86 percent, it may be suitable for a development scenario where the ground level is 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 (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 location 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, and an average utilization rate of 90 percent, 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 5 (5th and D Parking Lot) This site is a parking lot located in 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 due to the average 78 percent utilization rate. Density has been estimated at 30 units, or 99 du/ac. This site will be targeted for development via Implementation Program H-34.

Site 6 (4th and G Parking Lot) This site is a parking lot located in the Downtown area just east 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 with an average of 80 percent utilization, this site is proposed to be developed such that the ground level parking will be maintained for public parking. Density has been estimated at 25 units, or 62 du/ac. This site will be targeted for development via Implementation Program H-34.

Site 7 (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 has a utilization rate of 70 percent, 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 8 (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 9 (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 10 (City Hall Parking Lot – 6th Street) This site is a parking lot located adjacent to Eureka City Hall that provides employee and City vehicle 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 11 (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). Density has been estimated at 7 units, or 42 du/ac. This site will be targeted for development via Implementation Program H-34.

Site 12 (Sheriff'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 Sheriff'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 31 du/ac, which would result in 80 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.
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	IMP H-16, IMP H-18

2014-2019 Implementation Programs	Description	Progress and Continued Appropriateness	Continued in 2019-2027 Housing Element
		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.	
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 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 to 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	IMP H-18, IMP H-27, IMP H-28

2014-2019 Implementation Programs	Description	Progress and Continued Appropriateness	Continued in 2019-2027 Housing Element
		First, 30/60 Campaign (Housing 30 People in 60 Days); holding a 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.	
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 resources, when feasible. Target to create one senior housing facility between 2014 and 2019. Amend zoning code to improve ability to create senior housing.	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 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.	IMP H-16, IMP H-18
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	The 2019 Zoning Code update reduces barriers to create large units by continuing to calculate parking on a per-unit basis instead of on a per-bedroom basis, in addition to allowing parking alternatives and reductions. The City	IMP H-16, IMP H-18

2014-2019 Implementation Programs	Description	Progress and Continued Appropriateness	Continued in 2019-2027 Housing Element
	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.	has not required the creation of large units as a condition of funding, and zero large rental units were created between 2014 and 2019.	
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 Humboldt County Housing and Homeless Coalition (HHHC).	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 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.	IMP H-27
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

2014-2019 Implementation Programs	Description	Progress and Continued Appropriateness	Continued in 2019-2027 Housing Element
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. The dumpsters are provider free of charge by Recology.	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
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,	The comprehensive 2019 Zoning Code Update includes parking reductions or exemptions for: shared parking,	IMP H-1

2014-2019 Implementation Programs	Description	Progress and Continued Appropriateness	Continued in 2019-2027 Housing Element
	or reductions for developments near transit.	affordable housing, and housing built near transit.	
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 development standards to accommodate the housing needs of disabled persons. The application fee is waived for a request for reasonable accommodation.	Completed, not continued.
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	Building and Planning staff regularly attended trainings on green building practices and have periodically updated local codes as appropriate.	IMP H-23

2014-2019 Implementation Programs	Description	Progress and Continued Appropriateness	Continued in 2019-2027 Housing Element
	practices and incorporate best practices into local codes		

Letter of Support for Housing Element/IMP H-34

DANCO
THE DANCO GROUP OF COMPANIES

Danco Builders
Danco Builders Northwest
DT Builders
Danco Communities
Danco Property Management
Danco Supportive Services
Western Living Concepts

5251 Ericson Way
Arcata, CA 95521
Phone: (707) 822-9000
Fax: (707)8229596
www.danco-group.com
Contractor's Licenses
CA 899392, 500851, 986583

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)