

DESIGN REVIEW COMMITTEE STAFF REPORT May 8, 2024

Title:Housing Authority of the City of Eureka (HACE) 25-1 and Prospect Project Green Phase (Phase One of Seven)Projects:• Entire 25-1 and Prospect Project: Environmental Document ED-24-000 • Green Phase: Design Review DR-24-0002 and Density Bonus DB-24-0Locations:• Entire 25-1 and Prospect Project: HACE properties south of West Harr					
• Green Phase: Design Review DR-24-0002 and Density Bonus DB-24-0)3				
Locations: • Entire 25-1 and Prospect Project: HACE properties south of West Harr					
 Green Phase: 3230 Hiler St (AKA 708 Burrill St) 	is St				
APNs: • Entire 25-1 and Prospect Project: 009-072-001, 009-073-001, 009-074-					
009-075-001, 009-076-001, 009-083-001, 009-083-002, and 009-083-0 • Green Phase: 009-073-001	03				
Applicant: Hiler I LP					
Property Owner: Housing Authority of the City of Eureka (HACE)					
Purpose/Use: HACE is redeveloping eight properties totaling approximately 8.61 acres					
through a seven-phase project (the 25-1 and Prospect Project) which will re-	eplace				
106 dwelling units with 256 new dwelling units (for a net increase of 150 u					
The Green Phase will redevelop the first of the eight properties, replacing e	eight				
existing units with 44 new units on approximately 1.19 acres.					
pplication Date: March 20, 2024					
General Plan: MDR– Medium Density Residential					
Zoning: R2 – Residential Medium					
CEQA: Exempt under §15183, Projects Consistent with a Community Plan, General Plan, or Zoning	al				
Staff Contact: Penelope Ponce, Assistant Planner					
ecommendation: Hold a public hearing; and					
Adopt a resolution finding the entire 25-1 and Prospect Project exemp	t from				
	CEQA, and conditionally approving the Design Review and Density Bonus for				
the Green Phase.					
Motion: "I move the Design Review Committee adopt a resolution finding the entir	e 25-1				
and Prospect Project exempt from CEQA and conditionally approving the I					
Review and Density Bonus for the Green Phase, a 44-unit multi-family affo	rdable				
housing development at 3230 Hiler Street (AKA 708 Burrill Street)."					

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Figure 2: Site Map (Green Phase project site outlined in green)

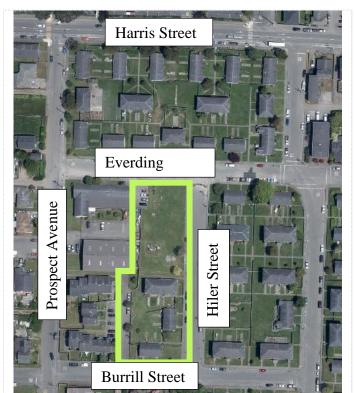


Figure 1: Location Map



PROJECT SUMMARY

Green Phase Project

The applicant, Hiler I LP, on behalf of the Housing Authority of the City of Eureka (HACE), is requesting Design Review and Density Bonus approval to replace eight dwelling units with a new 44-unit, two-story, multi-family, affordable housing development on HACE-owned property west of Hiler Street, between West Everding and Burrill Streets (Figure 2), known as the Green Phase. The development will include a secured apartment building with group entries to individual

dwelling units, a manager's unit and office, mail room, laundry facilities, two parking areas with a total of 29 parking spaces, eight short-term bicycle parking spaces and 15 long-term bicycle storage spaces in bike lockers, shared storage areas, a courtyard with a playground and barbecue area, an open space area with a community garden, landscaping, and a monument sign.

The Green Phase will provide 20 one-bedroom units, 12 two-bedroom units, and 12 three-bedroom units, all affordable to lower income households. Due to the development's intended affordability, the project qualifies for additional dwelling units, a waiver to the Parking Placement standard, and a concession/incentive to the Building Entries standard, pursuant to Eureka Municipal Code §155.344 (Density Bonus) and the State Density Bonus Law (Government Code §65915 et. seq.).

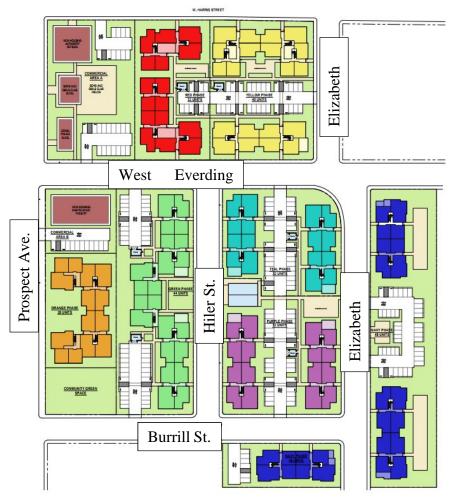
The Green Phase project site is 1.19-acres in size, but is currently located on a portion of an approximately 1.62-acre APN (owned by HACE) and includes a City of Eureka alley. A Lot Line Adjustment and/or Subdivision and Alley Vacation will also be processed at a later date to create one legal parcel for the Green Phase's project site. The project has been conditioned to require the Lot Line Adjustment and/or Subdivision and Alley Vacation to be finalized and recorded prior to issuance of the certificate of occupancy for the Green Phase.

25-1 and Prospect Project

The Green Phase Project is the first of seven phases of the 25-1 and Prospect Project, which redevelops HACE's existing public housing portfolio on eight adjacent APNs, replacing 106 existing housing units with 256 units. HACE has determined that the public-housing buildings on these properties are functionally obsolete and is pursuing a repositioning strategy pursuant to Section 18 of the United States Housing Act of 1937 (42 USC 1437p). HACE will remain as property owner and manager for all eight project APNs and seven phases, both during and after redevelopment.

Figure 3: Site Map (25-1 and Prospect Project)

Harris St.



The 25-1 and Prospect Project will occur in seven phases on an 8.61-acre development footprint and will demolish the existing housing and rebuild multi-family housing on each property at a higher density using current City zoning code density allowances and State Density Bonus law. As outlined in Table 1, the 25-1 and Prospect Project will result in 150 net new affordable units, including the 36 net new units achieved by the initial Green Phase. The project also proposes to redevelop and/or relocate several commercial and/or public facility buildings including the HACE offices, a housing maintenance facility, the Boys and Girls Club building, and a community police building. The proposed square footage of these buildings is provided in Table 1, which is the same as the existing building area. The project would also result in 186 net new parking spaces (increase from 28 existing spaces to 214). Proposed amenities include outdoor recreation areas and a community building.

Table 1: 25-1 and Prospect Project – Project Phases

Phase	Acreage	Building Area (s.f.)	Existing Units	Proposed Units	Existing Parking	Proposed Parking
Green	1.19	48,000	8	44	19	29
Teal	0.86	36,000	12	32	0	29
Purple	1.1	40,500	20	32	0	30
Yellow	1.05	46,500	16	40	0	28
Red	0.78	38,000	12	32	0	8
Navy	1.67	52,000	22	48	0	45
Orange	0.59	34,000	10	28	0	8
					0	
Commercial Area A	0.81		0	-6	0	26
CEHA Office		7,000				
Boys and Girls Club		3,500				
Community Police Building		1,500				
Commercial Area B	0.3		0	0	9	11
CEHA Maintenance Building		7,000				
Common Green Space	0.2		0	0	0	0
Total	8.61		106	256	28	214

Offsite infrastructure improvements required to serve the 25-1 and Prospect Project will be determined on a phase-by-phase basis. These improvements will occur within the adjacent public right-of-way and are anticipated to include the installation and/or replacement/repair of sidewalks, driveways, ADA improvements, stormwater facilities, sewer and water laterals, and dry utilities (such as, electrical, telecommunications, etc.).

The entire seven-phase 25-1 and Prospect Project is subject to the provisions of the California Environmental Quality Act (CEQA); and, although the City is only reviewing Design Review and Density Bonus applications for the Green Phase at this time, CEQA requires the City to review the environmental impacts of the "whole of the action" at one time, rather than dividing a project into two or more pieces and evaluating each piece in a separate environmental document (known as piecemealing or segmenting). The CEQA environmental evaluation for the entire 25-1 and Prospect Project is included as Attachment 4 and discussed in the "Environmental Assessment" section of this report.

Additional Background Information on the Green Phase

The goal of the Green Phase is to demolish as few units as possible, and to add as many as possible in their place, in order to minimize displacement of residents during future phases (see Attachment 3). Current residents displaced by the Green Phase will be offered the opportunity to relocate into other housing owned by HACE or will receive tenant protection vouchers to find housing elsewhere in the community.

Seven of the 44 units will be designed as mobility units located on the first floor, and they will contain the most accessible features, including but not limited to, lower kitchen and bathroom countertops, clear knee space under sinks and counters, widened doorways, accessible paths of travel throughout the entire unit, and ADA hardware on appliances and fixtures.

There will be three stormwater bio-retention areas, located between the courtyard space and sidewalk along Hiler Street, between the parking spaces and sidewalk along West Everding Street, and between the development and west property line near the backyard open space area (Attachment 2, Plan Sheet A100, keynote 20). The bio-retention areas will be landscaped with plantings similar to the other landscaped areas on site. A condition of approval has been added requiring the project to adhere to the City's MS4 Stormwater Program and site design measure requirements.

The applicant presented the Green Phase to the Design Review Committee at their regular meeting March 27th as a pre-application review item to collect feedback on the project's preliminary design. Overall, the Committee provided positive feedback on the Green Phase's design, and suggested using contrasting paint colors to provide visual contrast, and incorporating a larger open space area at the south end of the project site for activities which would enhance the tenant's quality of life. The applicant incorporated the Committee's contrasting colors paint suggestion in the final color options design plan, but did not modify the site layout as it would have impacted the number of vehicle parking spaces in the proposed parking area accessed via Burrill Street. The overall 25-1 and Prospect Project does include a large community green space on the southwestern edge of the project site, on the corner of Prospect Avenue and Burrill Street, directly adjacent to and west of the Green Phase (see Figure 3).

DENSITY BONUS ANALYSIS

The project will remove and replace two existing duplexes and one existing quadplex with a 44unit apartment complex pursuant to the provisions of the State Density Bonus Law (California Government Code [CA Gov. Code] 65915 et seq.). The project site is located in the Residential Medium (R2) zoning district which allows a maximum residential density of 22 units per acre (i.e. base density). Using this base density, up to 27 dwelling units would be allowed on the proposed 1.19-acre project site (to be created through an LLA and/or Subdivision and Alley Vacation at a later date, as conditioned). However, because all units, except for a manager's unit, will be reserved for lower-income households (i.e. deed restricted to households with incomes which are 20%-80% of the Humboldt County Area Median Income), the development qualifies for an 80% increase of units above the base density per CA Gov. Code 65915(f)(3)(D). Therefore, an additional 22 bonus dwelling units may be added to the allowed maximum density for the site for a total of 49 dwelling units (27 base + 22 bonus), but the project is only proposing 17 bonus units, for a total of 44 dwelling units (Figure 4). The Density Bonus is a state mandate, and a developer who meets the requirements of the state law is entitled to receive the density bonus and other benefits as a matter of right.

Figure 4: Density Bonus Table

Table 1:	Density Bonus Analysis
ZONING	R-2 MEDIUM DENSITY RESIDENTIAL
BASE DENSITY	22 UNITS / ACRE
BASE NUMBER OF UNITS ALLOWED	1.19 X 22 = 27 BASE UNITS
BASE AFFORDABLE UNITS PROPOSED	TOTAL OF 27 BASE UNITS, INCLUDING 26 INCOME- RESTRICTED UNITS (80% LOWER INCOME AND 20% MODERATE INCOME) AND 1 UNRESTRICTED MANAGER'S UNIT
ALLOWABLE DENSITY BONUS	80% INCREASE PER CA 65915(f)(3)(D) - 80% DENSITY BONUS FOR 100% LOW INCOME
NEW ALLOWABLE DENSITY	22 + (22 X 80%) = 40 UNITS / ACRE
DENISTY BONUS UNITS ALLOWED	27 BASE UNITS X 80% = 22 BONUS UNITS ALLOWED
BONUS DENSITY UNITS PROPOSED	TOTAL OF 17 BONUS UNITS (INCLUDING 80% LOWER INCOME AND 20% MODERATE INCOME)
TOTAL PROPOSED NUMBER OF UNITS	TOTAL OF 44 UNITS, INCLUDING 43 INCOME-RESTRICTED UNITS (80% LOWER INCOME AND 20% MODERATE INCOME) AND 1 UNRESTRICTED MANAGER'S UNIT
TOTAL PROPOSED DENSITY	37 UNITS / ACRE

Additionally, due to the project's intended affordability, the applicant is also requesting one Density Bonus waiver and one concession/incentive (Attachment 3). The first request is to waive the Parking Placement development standard in EMC §155.324.060(B)(2), which prohibits surface parking spaces for a multi-family dwelling from being located between the primary building and a front or exterior side property line. The project site (resulting from a future LLA and/or Subdivision and Alley Vacation) is configurated with three street frontages (Figure 5). The front lot lines adjoin Burrill Street (south) (approximately 136-feet long) and West Everding Street (north) (approximately 113-feet long), and the exterior side lot line adjoins Hiler Street (east), which has the longest street frontage (approximately 398-feet long). The new interior side lot line adjoins another HACE property to the west. The proposed new residential building is mostly located on the eastern side of the property fronting Hiler Street, while the two proposed parking lots are largely located behind the building. However, the structure is broken up so that the central dwelling units are set back behind a courtyard area, between the two parking lots. Because these parking lots are located between the central dwelling units and West Everding/Burrill Streets, the project does not meet the Parking Placement development standard (i.e., there is surface parking between a portion of the primary building and the front property lines on West Everding and Burrill Streets).

The project site is long and narrow, acting as both a through lot and corner lot, and complying with the Parking Placement development standard would physically prevent the Green Phase from being constructed at its permitted density because three sides of the site face public streets. The applicant has attempted to respect the intent of the Parking Placement development standard by tucking the parking behind most of the structural development so that it is hidden from Hiler Street. The courtyard area not only breaks up the massing of the building but will welcome residents into the development. The proposed configuration allows each portion of the building to share one building frontage to this community front yard open space area and allows no surface parking spaces to be seen from the exterior street frontage on Hiler Street. The parking areas will be screened from Burrill and West Everding Streets by landscaping and a 36-inch tall wall to provide parking lot screening to help meet the intent of the Parking Placement standard to ensure parking areas do not adversely impact neighboring properties and support a pedestrian-friendly streetscape design.

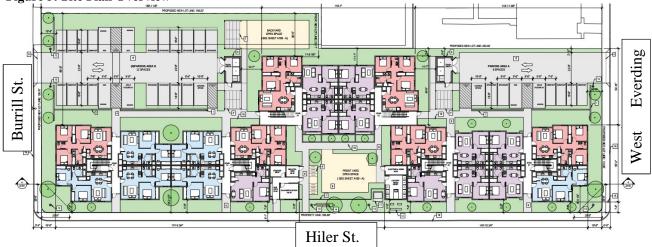


Figure 5: Site Plan Overview

The second request is a concession/incentive to deviate from the Building Entries development standard in EMC §155.312.040(B) to allow a limited number of building entries on the ground floor facing Hiler Street to enhance site safety and reduce development costs to allow the development to be built at the permitted density. The Building Entries standard requires all ground-floor dwelling units with street frontage have their own entrance facing the street. Due to the slope of the project site, ADA-compliance requirements, and safety concerns, the cost of installing an entrance from the street to each ground floor unit would not be economically feasible. Given that one of HACE's highest priorities in redevelopment is to improve both site accessibility and security, all units will open to a secured hallway, which will have both street-facing and rear-facing entrances. Dwelling units will be grouped in units of eight around each hallway to create small cohorts that, per the applicant, will feel like neighborhood blocks.

DESIGN REVIEW ANALYSIS

To approve a Design Review application, the Design Review Committee must make all of the following findings:

- A. The proposed development will not be detrimental to public health, safety, or welfare or materially injurious to the properties or improvements in the vicinity.
- B. The proposed project complies with all seven Design Review criteria in EMC §155.412.040(J) (Design Review Criteria).

A. Public Health, Safety, and Welfare

A comprehensive environmental evaluation was completed for the entire 25-1 and Prospect Project by a local consulting firm to support a CEQA statutory exemption determination under §15183 of the CEQA Guidelines (Attachment 4). The evaluation indicated all potential project impacts were adequately analyzed by the City's 2040 General Plan Update Environmental Impact Report (GPU EIR) and/or addressed through site-specific technical studies, including a Cultural Resources and Architectural History Inventory Report, Phase I Environmental Site Assessment Report, and sitespecific evaluations of noise, emissions, and vehicle miles traveled (VMT) generation. Although the evaluation concluded the entire project could result in potentially significant impacts to Air Quality, Cultural Resources, Greenhouse Gas Emissions, Hydrology and Water Quality, Noise, Public Services, Transportation, and Tribal Cultural Resources, the entire project is subject to applicable GPU EIR mitigation measures, performance standards, policies, programs, and other laws and regulations which will reduce project-specific impacts of the entire project to a less than significant level. The supporting GPU EIR information and the various project-specific studies support the finding that the project will not be detrimental to public health, safety and welfare.

The entire project was referred to the local Tribal Historic Preservation Officers (THPOs) and a Cultural Resources and Architectural History Inventory Report was prepared to determine potential impacts to cultural resources. The cultural review process found the entire project area (all phases) has a low potential for buried pre-contact archaeological sites, and no potential for indirect impacts to adjacent historic properties or historical resources were identified. No comments were received from the THPOs during the project referral period. Nevertheless, a condition has been added requiring the project to follow standard protocol for inadvertent archeological discovery if archeological resources are encountered during construction activities. The project was also reviewed by the City's Planning, Building, and Public Works Departments during a Development Review meeting in November 2023, who all provided feedback to the applicant on the Green Phase's design.

Based on the discussion herein, the finding can be made that the proposed Green Phase development, as conditioned, will not be detrimental to public health, safety, or welfare or materially injurious to the properties or improvements in the vicinity.

B. Design Review Criteria

- **1.** Surrounding Context. The overall project and associated buildings enhance the design quality of the area where they are located, and enhance Eureka's unique character and distinctive sense of place. New buildings may "fit in" with traditional architecture that complements the surrounding context or "stand out" with a contemporary and contrasting style. All buildings must minimize adverse impacts on neighboring properties when possible.
- **2. Pedestrian Environment**. *Buildings incorporate design features that support an active public realm and an inviting pedestrian environment.*
- **3.** Architectural Style. Buildings demonstrate a coherent and successfully executed architectural style. Building architecture may be traditional or modern. Buildings are not required to conform to any dominant architectural style or local vernacular. Creative architectural and artistic expression is encouraged.
- 4. Articulation and Visual Interest. Building facades are distinctive, create visual interest, and relate to the human scale through vertical and horizontal articulation, varied building planes, distinctive building elements, and/or noticeable architectural details. Building elements such as roofs, doors, windows, and porches are part of an integrated design and relate to the human scale. Architectural details such as articulation, trim, eaves, window boxes, and brackets contribute to the visual interest of the building.
- **5.** Materials. Building facades feature high-quality materials that are appropriate to the architectural style, enhance building articulation, and are compatible with surrounding development.

- 6. Safety. The project promotes public safety and minimizes opportunities for crime through design features such as property access controls (e.g., placement of entrances, fences), increased visibility, and features that promote a sense of ownership of outdoor space.
- 7. Landscaping. Landscaping features low-water-use plants appropriate for the local climate and does not include any invasive species that would be harmful to native plants and habitat, in compliance with 155.328.050. (D) (Invasive Plants).

All of the existing HACE residences being replaced as part of the entire project (including the Green Phase) were constructed in the 1950's and have a combination of one- and two-story multiunit structures with pitched roofs, covered entries, smooth stucco siding or vertical or horizonal grooved- or channeled-looking siding, and asphalt shingles. The area surrounding the HACE properties consists of a mix of 19th century architecture, to early, mid, and late 20th century development, including both single-family and multi-family residential structures. The project's design exhibits similar character and scale to the existing residences located in the surrounding neighborhood. For instance, the new building will be no taller than two stories and will include varied building forms with recessed and projecting building walls, covered building entries, and varied pitched roofs to look and feel like townhomes and not one large apartment building (Figure 6). Per the applicant, two existing historic homes in the project area (525 W Harris Street and 715 Steward Street; see Figure 7 and/or Attachment 2, Plan Sheet T003) were used as referenced points when creating the architectural design of the Green Phase apartment building to ensure it "fits in" with the neighborhood (Criteria 1) and exhibits a coherent architectural style (Criteria 3).



Figure 6: View of the Proposed Development from Hiler Street (looking west)





HISTORICAL REFERENCE - 525 W. HARRIS STREET

HISTORICAL REFERENCE - 715 STEWART STREET

The street-facing facades on West Everding, Hiler, and Burrill Streets incorporate design features which contribute to an inviting pedestrian environment and create articulation and visual interest. These design features include horizontal fiber cement siding painted with a combination of light and dark colors, horizontal articulation of building walls, shared street-facing entries for groups of

dwelling units, four-foot-tall vertical blade metal fencing around the Courtyard adjacent to Hiler Street, and an array of windows (using a mix of regular and storefront-type windows) which avoids blank wall space (Figure 8) (Criteria 2 and 4).

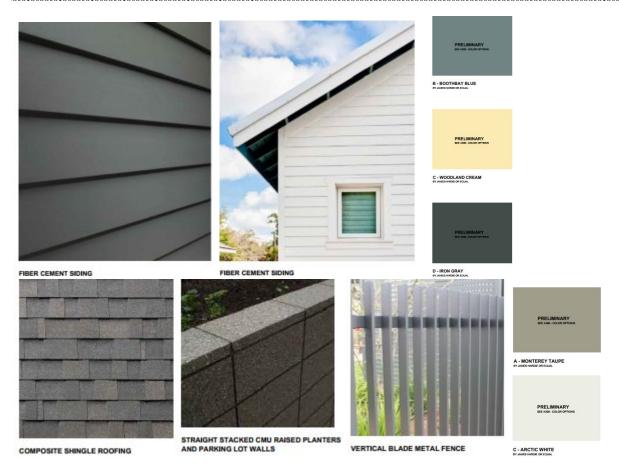
There will be paved ADA-accessible walkways connecting to the sidewalk on Hiler Street, and walkways throughout the development which will give pedestrians designated paths of travel to each portion of the development (Figure 5). The project will have a monument sign located near the pedestrian entrance along Hiler Street, and a condition of approval has been added to alert the applicant to the requirement to apply for a sign permit. Overall, the Green Phase's building incorporates design features that support an active public realm and an inviting pedestrian environment (Criteria 2).

The apartment building was designed to look and feel like townhouses or attached single-family homes with its three off-set building forms, pitched roofs, roof eves, composite shingle roofs, horizontal siding, projecting and recessed walls, and prominent shared building entries, creating a coherent architectural style (Figure 8) (Criteria 3).



Figure 8: View of the Courtyard Space along Hiler Street (looking west)

The building's materials include horizontal fiber cement siding, composite single roofing, and "Iron Gray" painted fiber cement roof facias, metal overhangs over building entries, metal gutters and downspouts painted to match the siding, metal mesh mechanical screening on the roof, painted concrete walkways, and windows comprised of either aluminum or vinyl (Figure 9). The project proposes to use durable, low-maintenance and modern materials that are designed to complement the character of the materials used by the residences in the surrounding neighborhood. Therefore, the materials used are appropriate for the architectural style of the building, enhance building articulation, and are compatible with the surrounding development (Criteria 1 and 5). **Figure 9: Proposed Materials and Paint Color Options**



The Green Phase will promote public safety and minimize opportunities for crime through design features incorporated into the project, including property access and controls, providing pedestrian-scale lighting, and securing the waste storage area (Criteria 6). The project proposes group entrances where all units open to a secured hallway which then opens to the outside. Doubled locked entries will be provided throughout the development, where residents would enter through a locked door to gain access to their hallway or stairwell, which would then lead to a secured entry door for each dwelling unit. Secured doors will also be featured throughout the development's shared amenities, including the laundry room and mailroom. 15 long-term bicycle parking spaces will be kept in secured bike lockers. The project will include a four-foot-tall metal fence with a small walkway entrance along Hiler Street which will separate the development's courtyard/"front vard" open space from the street. A three-foot wall with straight stacked concrete masonry units (CMU) will be placed along West Everding and Burrill Streets to provide screening to the parking areas. The "backyard" open space area will not be accessible from the street as it will be located behind the apartment building and parking areas, but walkways from the parking areas and other areas within the development will be provided to the backyard space. Outdoor "Dark Sky" compliant lighting will be provided throughout the parking areas, pedestrian walkways, and on building facades to ensure residents have a safe, well-lit path of travel to and from their units (Figure 10). The waste storage areas will be located towards the center of the project site away from the streets, and will be secured and screened from view with CMU walls at least seven-feet tall (as required by City standards for dumpsters). The design thoughtfully addresses safety throughout and around the new housing development (Criteria 6).

Figure 10: Proposed Pedestrian-Scale Lighting Specs



Although a landscape plan with a planting list in conformance with EMC §155.328 has not yet been provided, the plans show all areas on the project site not covered by structures or used for access will be landscaped, and per the site plan note 4 (Attachment 2, Plan Sheet A100) the overall planting palette will incorporate low-water-use native and noncompeting exotic species of trees, shrubs and groundcover (Criteria 7).

ENVIRONMENTAL ASSESSMENT

The City of Eureka, as Lead Agency, has determined the entire seven-phase project, the 25-1 and Prospect Project (including the Green Phase), is statutorily exempt from the provisions of CEQA, pursuant to §15183 (Projects Consistent with a Community Plan, General Plan or Zoning) of the CEQA Guidelines. Per §15183(a), "CEQA mandates that projects which are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. This streamlines the review of such projects and reduces the need to prepare repetitive environmental studies."

The City of Eureka certified a General Plan Update Environmental Impact Report (GPU EIR) in conjunction with the adoption of the 2040 General Plan on October 15, 2018 (State Clearinghouse #2016102025). The 25-1 and Prospect Project is consistent with the City's 2040 General Plan, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required. Further supporting information on how the entire 25-1 and Prospect Project (all seven phases including the Green Phase) is statutorily exempt pursuant to §15183 is found in Attachment 4.

PUBLIC HEARING NOTICE

Public notification consisted of notification by mail of property owners within a 300-foot radius of the site on April 26, 2024. In addition, the notice was posted on the City's website and bulletin boards. A public hearing notice sign was posted on the site on or before April 26, 2024.

CONCLUSION

Based on the analysis above, the Green Phase's 44-unit multi-family affordable housing development qualifies for the requested Density Bonus additional dwelling units, waiver, and a concession/incentive; will not be detrimental to public health, safety, or welfare; and complies with all applicable Design Review criteria in EMC §155.412.040 (J) (Design Review Criteria). Additionally, the entire 25-1 and Prospect Project (including the Green Phase) is statutorily exempt from CEQA as described above.

DOCUMENTS ATTACHED

Attachment 1: Design Review Committee Resolution

Attachment 2: Applicant Submitted Design Review Plans

Attachment 3: Applicant Submitted Density Bonus Materials

Attachment 4: Supporting Information for CEQA Statutory Exemption 15183