

January 9, 2023

Title:	General Plan Conformance Review for 3007 and 3015 I Streets
Project(s):	GPC-22-0002
Location:	3007 and 3015 I Streets
APN:	011-063-001 and 011-063-006
Applicant:	County of Humboldt
Property Owner:	PWM, Inc
Purpose/Use:	Public Health Laboratory Facility
Application Date:	December 9, 2022
General Plan:	PO – Professional Office
Zoning:	OR – Office Residential
CEQA:	Exempt under §15061(b)(3) Common Sense
Staff Contact:	Aubrie Richardson, Associate Planner
Recommendation:	Receive report; and Adopt a Resolution finding the conformance review is exempt from CEQA and determining the County of Humboldt’s acquisition and development of 3007 and 3015 I Streets conforms with the City’s 2040 General Plan.
Motion:	<i>“I move the Planning Commission adopt a Resolution finding the conformance review is exempt from CEQA and the acquisition of the land and development of an office building at 3007 and 3015 I Street conforms with the City’s 2040 General Plan”</i>

Figure 1: Location Map



Figure 2: Site Map



PROJECT SUMMARY

The County of Humboldt is requesting General Plan Conformance Review for the proposed acquisition of two adjacent parcels (3007 and 3015 I Streets) and the construction of a public health laboratory facility. Once the County acquires the properties, to facilitate development of the site as intended, the County proposes to first merge the parcels and then demolish an existing single-family residence on the site.

Background

Since the proposed project is located within the City limits of Eureka, California Government Code Section 65402 requires the County, prior to either acquisition or disposal of real property, and/or construction of public buildings or structures, to request a determination from the City of Eureka as to the conformity of the proposed project with the City's adopted 2040 General Plan. The report must analyze the location, purpose and extent of the proposed acquisition and public building construction. Section 65402 requires the City provide the report within 40 days after the request is submitted. Failure to provide the report within the 40-day timeframe is conclusively deemed a finding the proposed acquisition and public building construction are in conformity with the City's adopted General Plan. The application for General Plan conformance review was deemed complete by the City on December 9, 2022, and the 40-day response period ends on January 18, 2023.

The approximately 0.34-acre project site is located at the southeast corner of Wood and I Streets, and is comprised of two, 7,350-square-foot (-sf) parcels (APNs 011-063-001 and 011-063-006). The northern parcel (3007 I Street) contains an existing 926-sf, single-story, single-family residential structure, while the southern parcel (3015 I Street) is currently vacant; a single-family residence was removed from the parcel between 2016 and 2018 under Building Permit No. B16-0488.

The subject property and surrounding parcels to the south, east, and west have land use designations of Professional Office (PO) and zoning classifications of Office Residential (OR). The adjacent parcels to the south are developed with medical offices, the adjacent parcel to the east is developed with a church and wireless telecommunication facilities, and the parcel across I Street to the west is the County of Humboldt's Clark Complex which contains a variety of County office facilities. The parcel across Wood Street, to the north of the project site, is designated Low Density Residential (LDR) and zoned Residential Low (R1), and developed with a single-family home.

The County proposes to acquire the subject property, demolish the existing residential structure, merge the two parcels, and then construct a new 7,000-10,000-sf, two-story office building with associated parking lot. The purpose of the proposed acquisition and development is to allow the Department of Health and Human Services (DHHS) to modernize and consolidate its laboratory operations into a single efficient facility. The County published a Facilities Master Plan in 2020 which includes the goal of investing in County-owned and consolidated facilities for DHHS services, as DHHS facilities are mostly leased, adding expense, and spread throughout the City of Eureka in multiple small buildings, resulting in inefficiencies for staff and inconvenience for service recipients.

DHHS' public health laboratory provides testing services and support for community health providers to aid in the diagnosis and control of communicable diseases, and plays a key role in emergency preparedness by providing testing services, training and support for area laboratories. DHHS' existing public health laboratory is located at 529 I Street, a property listed on the City of Eureka's Local Register of Historic Places, where it is distributed into three distinct and separate areas of one building constructed in 1938. According to the County, there are practical and programmatic challenges to upgrading and adding services to the laboratory in its present location. Relocating the public health laboratory to the area near the Clark Complex, which includes several existing DHHS programs, would support a long-term goal of the County to consolidate DHHS programs around the Clark Complex.

Although the County is exempt from the City's zoning regulations, pursuant to Eureka Municipal Code (EMC) [155.504.030.44](#) , the proposed use is defined as a Government Facility which is principally permitted in the OR zone. The County has submitted preliminary development plans for the facility which appear to comply with applicable zoning standards. The proposed facility will be occupied by approximately 15 to 20 lab staff and administration, primarily during standard business hours. The County anticipates minor use of the facility by people other than employees, primarily for drop-off of samples and occasional meetings with outside groups and vendors, with

occasional deliveries to and from local hospitals in small vehicles.

Figure 3: Existing Residence at 3007 I Street



The existing residential building at 3007 I Street proposed for demolition was built in 1930, but is not on the Local Register of Historic Places or included in *Eureka, An Architectural View* (Green Book) as part of the historical inventory. The County has provided a historical evaluation prepared by William Rich

and Associates confirming the structure does not meet the historical significance criteria for listing on an historic register at the local, state or national level. The OR zone district does not

allow for new single-family residences, so the existing 926-sf house to be demolished would not be permitted if it were proposed today.

ANALYSIS

The objective of this consistency determination is to evaluate whether the proposed project conforms with the City's 2040 General Plan.

2040 General Plan Land Use Designation

The land use designation for the subject property is Professional Office (PO). The PO land use designation is defined as follows in the City's 2040 General Plan:

Customer-serving and non-customer-serving professional offices, clinics, hospitals, and related retail and services, as well as residential uses. Also applied to areas with a mix of single-family and multi-family housing, small scale offices, some converted residential buildings, and lodging where the intent is to generally retain the character, scale and form of the residential neighborhood. Intended to provide a mix of office and residential uses in an environment with a different character and lower intensity than the mixed-use commercial districts of the City. Limited commercial uses may be allowed as provided for by the applied zoning district.

The proposal for a 7,000-10,000-sf, two-story office building on a 14,700-sf lot meets the intent of the PO land use designation to have a lower intensity than the mixed-use commercial districts of the City. The proposed development is consistent with the scale of development and intensity of use in the surrounding area, and is below the maximum 2.5 FAR for the designation, and there is no minimum FAR. The proposed use of the building as a public health laboratory is also consistent with the PO designation which is intended for a mix of office and residential uses, including non-customer-serving professional offices.

2040 General Plan Goals and Policies

Goals and policies in the City's 2040 General Plan were reviewed for applicability to the proposed project, and the following goals and policies were identified for Planning Commissions' consideration:

GOAL LU-I A Community that values its unique small-town charm and livability while thoughtfully advancing new prospects for growth and economic vitality.

Consistent. *The proposed acquisition and development of the site with a public health laboratory facility advances new prospects for growth in the City of Eureka consistent with Goal LU-I.*

LU-I.3 Beneficial Development. Support development that affords benefits to all segments of the community that: [...]

(c) Develops underutilized or vacant parcels.

Consistent. *The proposed project will redevelop two contiguous underutilized parcels (one undeveloped and one with a vacant single-family home), consistent with Policy LU-I.3(c).*

(k) Develops intersection corners and street frontages with buildings instead of parking lots.

Consistent. *The County has indicated the redeveloped site will be consistent with the applicable development standards of the City of Eureka Zoning Code, including the requirement that surface parking spaces for new development not be located between a building and a front or exterior side lot line in the OR zone [Eureka Municipal Code (EMC) Section 155.324.060.B.3], as shown in the two conceptual predesign site plans provided by the County (Attachment 2). As a result, the portion of the property fronting the intersection of Wood and I Streets will be developed with a building instead of a parking lot, consistent with Policy LU-1.3(k).*

GOAL LU-6 New growth and annexation areas that are carefully planned, efficient, and contribute positively to the community.

Consistent. *The proposed acquisition and construction of a public health laboratory is aligned with the adopted Humboldt County Facilities Master Plan and will result in more efficient operations for DHHS, which in turn will allow DHHS to better serve the public, contributing positively to the community. As a result, the proposed project is consistent with Goal LU-6.*

LU-6.2 Infill First. Promote development of vacant infill properties and redevelopment/reuse of economically underutilized sites and buildings to accommodate new growth and internal densification prior to considering potential annexation.

Consistent. *The proposed project will result in the redevelopment of two parcels, resulting in new growth and internal densification within existing City limits, consistent with Policy LU-6.2.*

LU-6.8 Project Review. Review, comment, and coordinate on plans and projects of overlapping and neighboring agencies to ensure compatibility with the City's General Plan, and to ensure that impacts on the City are fully mitigated.

Consistent. *The County coordinated closely with City Staff on preliminary development plans for the proposed facility, including applying for and attending a pre-application Development Review meeting where the County Project Manager received feedback from City Planning, Building, and Engineering Staff. In addition, although the County is exempt from the City's zoning code standards and design review process, the County has indicated they intend to comply with applicable zoning regulations, including standards for size, height, setbacks, and exterior design features, and has offered to provide an informational presentation to the Design Review Committee to solicit feedback on the physical appearance of the proposed building, landscaping, and parking. As a result, review, comment and coordination has and will continue to occur to ensure the proposed project is consistent with the City's 2040 General Plan, consistent with Policy LU-6.8.*

GOAL HS-5 A consistent and well-maintained relationship with the Humboldt County Department of Health and Human Services to advocate that the County efficiently and effectively implement funding and programs dedicated to ensuring that Eureka has healthy communities and adequate human services to combat homelessness.

Consistent. *The proposed project supports DHHS in efficiently and effectively implementing programs dedicated to ensuring Eureka has healthy communities, consistent with Goal HS-5.*

HS-5.1 Health Care Facilities. Continue to coordinate with public and private health care providers to develop new, and strengthen existing, health care facilities within the City in order to continue providing adequate health care services for Eureka and the surrounding communities of Humboldt Bay.

Consistent. *The proposed project will allow DHHS to modernize and consolidate existing public health laboratory operations, strengthening existing health care services consistent with Policy HS-5.1.*

HS-5.4 Site Location. Work with Humboldt County and local organizations to identify adequate sites for health and human services facilities within the City to ensure that such facilities are easily accessible and equitably distributed throughout the City in a manner that makes the best use of existing facilities and ensures compatibility with adjoining uses.

Consistent. *The proposed project will result in the relocation of DHHS' public health laboratory operations from 529 I Street to 3007/3015 I Street, an area where a number of DHHS facilities are already consolidated. The public health laboratory does not serve the public directly, but rather provides laboratory support for community health providers and other area laboratories. As a result, the portion of Policy HS-5.4 calling for easy public access and equitable distribution of services is not applicable. Humboldt County has identified the subject site as an adequate site which will allow for added services and upgrades not feasible at the facility's present location. The site is across the street from several existing DHHS programs which will benefit from having the laboratory within walking distance. Therefore, the proposed project supports improved use of existing DHHS facilities consistent with HS-5.4. The project site is surrounded by offices to the west and south, a church to the east, and a single-family residence to the north, and a proposed two-story laboratory facility will be compatible with these adjoining uses. Therefore, the proposed acquisition and development is consistent with HS-5.4.*

GOAL H-5 Existing affordable housing units are retained and preserved, while displacement from housing is minimized.

Inconsistent. *According to the historical evaluation report prepared for 3007 I Street, the 926-sf house proposed for demolition was owner-occupied by the Zarucchi family from at least 1940 through 1977. ParcelQuest indicates the parcel was last sold in 2009 by a Gino Zarucchi for \$171,000, and is currently valued by the Assessor's office at \$207,985, with Zillow estimating the property's potential worth at \$330,500. For comparison, the median value of an owner-occupied housing unit in Eureka is \$296,500, which is considered affordable only to above moderate-income households (U.S. Census Bureau, 2017-2021). According to the City's Housing Element Technical Appendix, single-family homes in the OR zone district are assumed to only be affordable to above-moderate income households for owner-occupied housing. Because the City has no knowledge of whether the property has been rented and at what rent, a determination of rental affordability cannot be made.*

There is a note in the City's permit tracking system stating the residence was vacant in 2009, but it is unclear whether it has been occupied since then. The house, originally constructed in 1930, appears to currently be in poor condition. It is unclear if the house, prior to vacancy, was affordable rental housing or met the definition of low-income housing, so it is unclear whether associated Policies H-5.3 and H-5.5 are applicable (included below for reference). However, Goal H-5 calls for the retention and preservation of affordable housing units and minimization of displacement from housing, and, as discussed above, the existing residence would likely at least be affordable to above-moderate income households. Demolishing the onsite residence without replacement of the housing unit is inconsistent with this goal, and not supportive of the larger purpose of the Housing Element to achieve a net creation of 952 housing units during the 2019-2027 planning period, including 402 above-moderate units. If the County considered dedication of County land for housing, or other strategies to replace the lost housing unit, the project could be found consistent with Goal H-5.

H-5.3 Retention of Affordable Rental Housing. Support the retention of existing affordable rental housing, where feasible and encourage the replacement of lost units; and [...]

H-5.5 Loss by Neglect. Support proactive measures to prevent the loss of low-income housing by neglect.

Consistency Determination

The review identified applicable goals and policies of the 2040 General Plan related to the project and found the project as proposed is consistent with all but one goal calling for the preservation of affordable housing. If the County dedicated land for replacement housing or implemented an alternative strategy to off-set the loss of the existing single-family residence, the project could be found consistent with all goals and policies.

Planning Commission could take the stance that if the project is inconsistent with any goal or policy, then the whole project is inconsistent. Or the Planning Commission could weigh the consistent findings against the inconsistent finding. Planning Commission could also choose to factor in the merits of the proposed DHHS public health laboratory facility and look more broadly at the intent of the 2040 General Plan to promote beneficial growth in Eureka.

Although Staff believes the loss of housing is regrettable, and the County should consider on- or off-site replacement housing, the overall benefit of the project for the community is a positive one, and furthers a number of 2040 General Plan goals and policies related to developing underutilized properties, supporting densification of the City through infill development, and supporting DHHS in efficient and effective provision of public health services. Staff therefore recommends Planning Commission consider the benefit of the project, and determine the project will overall conform with the City of Eureka's General Plan.

Environmental

General Plan Conformance Review is a "project" for the purposes of the California Environmental Quality Act (CEQA). However, pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15061(b)(3), CEQA only applies to projects which have a significant effect on the environment. Where it can be seen with certainty there is no possibility the activity in question may have a significant effect on the environment, the activity is not subject to CEQA. In this case, the General Plan Conformance Review is only making the

determination whether the proposed project is consistent with the Eureka's 2040 General Plan, and, regardless of whether the Planning Commission determines the proposed acquisition, demolition, and subsequent construction is or is not in conformance with the General Plan, the County may still proceed with the project. Therefore, the General Plan Conformance Review, by itself, does not have the potential to cause a significant effect on the environment.

STAFF CONTACT

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DOCUMENTS ATTACHED

Attachment 1: Planning Commission Resolution 2023-____

Attachment 2: Humboldt County General Plan Conformance Request Letter and Site Diagrams