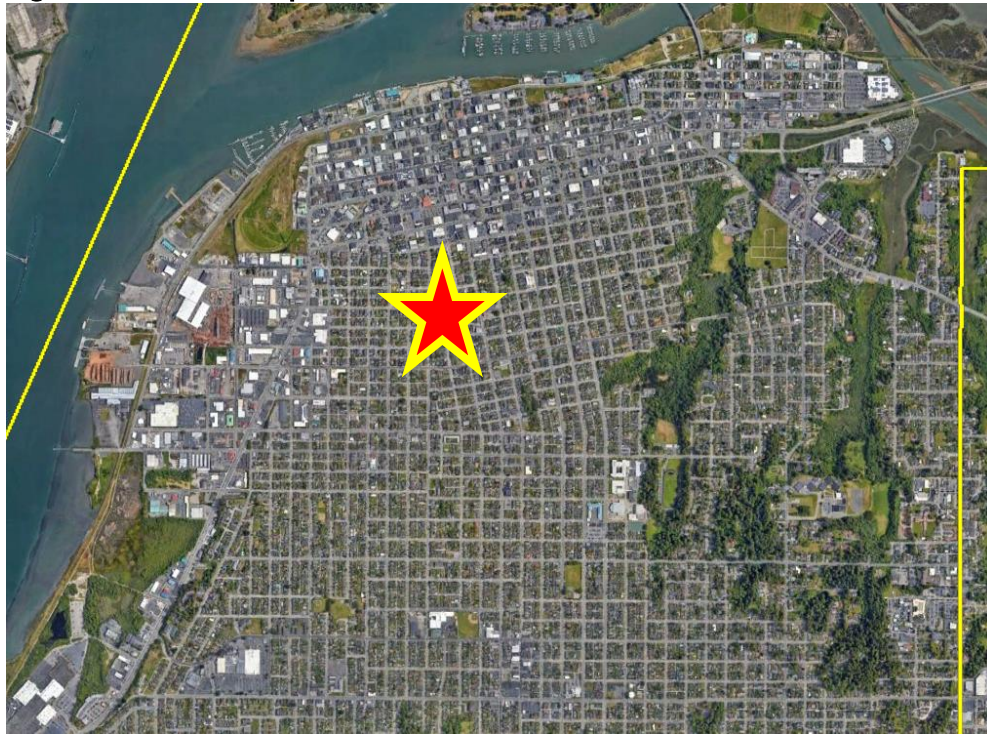


DESIGN REVIEW COMMITTEE STAFF REPORT

July 10, 2024

Title:	Housing Authority of the City of Eureka (HACE) C and Clark Streets Multi-Family Affordable Housing Development
Projects:	Design Review DR-24-0003, Density Bonus DB-24-0004, Environmental Document ED-24-0010
Location:	1115 C Street
APN:	004-163-001
Applicant:	Clark I LP
Property Owner:	Housing Authority of the City of Eureka (HACE)
Purpose/Use:	HACE is redeveloping an existing 29,862 square-foot (sf) affordable housing site by replacing six duplexes (12 dwelling units) with a new 44-unit, three-story, apartment building for seniors.
Complete Application:	June 24, 2024
Deadline for Action:	September 22, 2024
General Plan:	HDR – High Density Residential
Zoning:	R3 – Residential High
California Environmental Quality Act (CEQA):	Exempt under California Public Resource Code (PRC) §21083.3, CEQA Guidelines §15183 (Projects Consistent with a Community Plan, General Plan, or Zoning)
Staff Contact:	Millisa Smith, Associate Planner
Recommendation:	Hold a public hearing; and Adopt a resolution finding the project exempt from CEQA, and conditionally approving the Design Review and Density Bonus.
Motion:	<i>"I move the Design Review Committee adopt a resolution finding the project exempt from CEQA and conditionally approving the Design Review and Density Bonus for the C and Clark Streets multi-family affordable housing development at 1115 C Street."</i>

Figure 1: Location Map



PROJECT SUMMARY

Clark I LP (Applicant), on behalf of the Housing Authority of the City of Eureka (HACE), is requesting Design Review and Density Bonus approval to replace six duplexes containing 12 dwelling units with a new 44-unit, three-story, apartment building for seniors on a 29,862-square-foot (sf), HACE-owned property located on the southeastern corner of C and Clark Streets (herein called the C and Clark development) (Figure 2). The proposed housing units will be one-bedroom, one-bathroom units approximately 555 sf in size (Figure 3). 43 of the units will be income-restricted affordable housing for seniors (80 percent lower income and 20 percent moderate income), with one unit retained for an onsite manager. The C and Clark development will also include a manager's office, mail room, laundry facilities on each floor, shared storage spaces, 11 vehicle parking spaces, 8 short-term bicycle parking spaces, 16 long-term bicycle parking spaces, a shared open space with a community garden, outdoor seating areas, an indoor community room, and landscaping. Pursuant to EMC §155.312.020(A)(1), all new primary buildings in the Residential High Zoning District (R3 District) require Design Review.

Due to the development's intended affordability, the project qualifies for additional dwelling units and a waiver to the Floor Area Ratio (FAR) development standard, pursuant to Eureka Municipal Code (EMC) §155.344 (Density Bonus) and the State's Density Bonus Law (California Government Code [CGC] §65915 et. Seq.).

HACE has determined the existing public housing (i.e. duplexes) at the site, built in 1964, is functionally obsolete, and is pursuing a Section 18 of the United States Housing Act of 1937 (42 USC 1437p) repositioning strategy. With the demolition of the 12 existing dwelling units and the construction of the proposed 44 dwelling units, the site will have a net increase of 32 dwelling units. Current residents who are displaced by the redevelopment effort 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. HACE will remain in the ownership structure and continue to property manage, both during and after development.

Figure 2: Site Map



Any required offsite infrastructure improvements needed to serve the project would occur within the public right-of-way and could potentially include the installation and/or replacement/repair of sidewalks, ADA improvements, stormwater facilities, sewer and water laterals, and dry utilities (such as electrical, telecommunications, etc.).

HACE hosted a community meeting on April 17, 2024 to specifically receive feedback on the C and Clark development. Participants were able to provide live feedback via Zoom polls, Q&A, and digital chat. The current design aims to reflect that feedback by incorporating outdoor spaces, including a community garden and outdoor seating options, designed to be in a central focal point to the site and abutting the indoor community room, as well as incorporating the accessibility features described below.

All upper floors will be serviced by elevators, and 50% of the units (22 units) will be mobility units and the remainder will be able to be adapted into mobility units. Mobility units will include many accessible features, including (but not limited to) lower kitchen and bathroom countertops, clear knee space under sinks and counters, wide doorways, accessible paths of travel throughout the entire unit, grab bars at water closets and baths, and ADA-compliant hardware on appliances and fixtures. ADA-adaptable units will have most of the permanent accessibility features that would

be found in a mobility unit (such as wide doorways and lowered counters) but may temporarily omit/add some features that can be added/removed at a later date as a reasonable accommodation for a resident who is living with a disability, like adding grab bars or removing lower cabinetry for wheel chair access.

Figure 3: Proposed Site Plan



The Applicant also presented the proposed C and Clark development to the Design Review Committee (Committee) at their regular meeting on June 12, 2024 as a pre-application review item, which allowed the Committee to provide preliminary feedback. The Committee and Applicant discussed colors and project orientation, among other topics. The Applicant has not made any alterations to the plan set following the pre-application review.

DENSITY BONUS ANALYSIS

The project site is located in the Residential High Zoning District (R3 District) which allows a maximum residential density of 1 dwelling unit per 1,000 sf of site area (base density). Using the base density, up to 30 dwelling units would be allowed on the project site (29,862 sf site/ 1,000 sf per unit = 29.862 units, rounded up to 30). However, because all units, except for a manager's unit, will be reserved for income-restricted households (80 percent lower income and 20 percent moderate income), the development qualifies for an 80% increase of the number of dwelling units above the base density, pursuant to CGC §65915(f)(3)(D). Therefore, an additional 24 bonus dwelling units may be added to the allowed maximum density for the site for a total of 54 dwelling units (30 base + 24 bonus), but the project is only proposing 14 bonus units (47% density bonus), for a total of 44 dwelling units. 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.

Additionally, due to the development's intended affordability, the Applicant is requesting a Density Bonus waiver to waive the Floor Area Ratio (FAR) development standard in EMC §155.204.030 (Table 204-3: R2 and R3 Development Standards), which requires construction in the R3 District to have a maximum FAR of 1.25 (125%), which would allow the 29,862-sf project site to have a total floor area of 37,328 sf. The proposed three-story building will have a total floor area of approximately 38,750 sf, or a FAR of 1.30 (130%), thus requiring a Density Bonus waiver to exceed the maximum 125% FAR standard by 5%. The development would be infeasible without the FAR waiver, as with the allowed number of bonus dwelling units and the already small size of each dwelling unit (555 sf), fitting all of the units in a smaller building would not be possible.

Figure 4: Design Rendering (view from the corner of C Street and Clark Street)



DESIGN REVIEW ANALYSIS

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

- I. The proposed development will not be detrimental to public health, safety, or welfare or materially injurious to the properties or improvements in the vicinity.

2. The proposed project complies with all applicable Design Review criteria in EMC §155.412.040.(j) (Design Review Criteria).

When acting on a Design Review application, EMC §155.412.040.(l) (Scope of Design Review) prescribes the Committee must consider only those project features directly related to the Design Review Criteria described in EMC §155.412.040.(j), and may not require a modification to a project feature that complies with mandatory development standards in the Zoning Code. Design Review is intended to address only aesthetic considerations not otherwise regulated by the Zoning Code.

I. Public Health, Safety, and Welfare

Aside from the aforementioned Density Bonus waivers to exceed maximum density and FAR development standards as allowed by the State's Density Bonus Law, the proposed plans for the C and Clark development comply with all of the applicable objective development standards of the Zoning Code which have been adopted to protect the public health, safety, and welfare.

The Applicant has not yet submitted detailed lighting or landscaping plans, but these plans will be required as part of the Building Permit submittal, and Planning Staff will review for consistency with relevant Zoning Code standards as part of the Building Permit process. The project has been conditioned to alert the Applicant to the need to obtain a Building Permit for all construction and an Encroachment Permit for any work performed within the City's public right-of-way. The proposed plans also indicate a project sign will be installed facing Clark Street that has yet to be designed; another condition of approval has been added to alert the Applicant to the requirement to apply for a Sign Permit.

In addition to Zoning Code standards, the City has a number of General Plan policies intended to protect health, safety, and welfare, including but not limited to 2040 General Plan Policy N-1.13, which limits construction activity to the hours of 7 a.m. to 7 p.m., and 2040 General Plan Policy AQ-1.3, which requires adherence to air quality best management practices (BMPs) during excavation and earthmoving activities, including adherence to standard dust control measures. Conditions have been added to ensure the Applicant is aware of these construction-phase General Plan requirements.

A comprehensive environmental evaluation was completed for the C and Clark development by a local consulting firm to support a CEQA exemption determination under PRC §21083.3, CEQA Guidelines §15183 (Projects Consistent with a Community Plan, General Plan, or Zoning) (Attachment 4). The evaluation included site-specific analysis of potential environmental impacts supported by a number of site-specific technical studies, including but not limited to a Cultural Resources and Architectural History Inventory Report (Page 169 of Attachment 4), Phase I Environmental Site Assessment Report (Page 262 of Attachment 4), and site-specific evaluations of noise (Page 1,302 of Attachment 4), emissions (Page 78 of Attachment 4), shading (Page 75 of Attachment 4), and vehicle miles traveled (VMT) generation (Page 1,332 of Attachment 4). The CEQA analysis and the various project-specific studies support the finding that the project will not be detrimental to public health, safety and welfare.

A Cultural Resources and Architectural History Inventory Report (Page 169 of Attachment 3) was prepared in April of 2024 to determine potential impacts to cultural resources. The report indicates the existing structures proposed for demolition do not meet any of the criteria for

listing in the National Register of Historic Places, California Register of Historic Resources, or the Eureka Local Register of Historic Places; the project will not result in significant indirect impacts to nearby historic resources; and the project area has a low potential for buried pre-contact archaeological sites. For compliance with provisions of the National Environmental Policy Act (NEPA) due to federal project funding, a Section 106 consultation request was sent on April 22, 2024 to area Tribal Historic Preservation Officers (THPOs). The Bear River Band and the Wiyot Tribe THPOs responded on May 20, 2024, and May 17, 2024, respectively, with requests for standard inadvertent discovery protocol if archeological resources are encountered during ground-disturbing construction activities. A follow-up project referral was sent to Humboldt Bay Area THPOs on June 10, 2024, and on June 12, 2024, one comment was received from the Bear River Band THPO again requesting standard inadvertent discovery protocol. In response to the THPOs' requests, the City's standard inadvertent discovery protocol condition has been added.

The project referral mentioned above that was sent to the Humboldt Bay Area THPOs on June 10, 2024 was also sent to a variety of City departments and outside agencies who may have interest or jurisdiction over the property or the intended use of the property. Public Works – Engineering submitted detailed comments on necessary upgrades to existing water and sewer service and associated utility impact fees; this information has been forwarded to the Applicant and will be addressed during the Building Permit process (Attachment 5). No other comments were received that indicate the C and Clark development, as conditioned, will be detrimental to the public health, safety, or welfare, or materially injurious to the properties or improvements in the vicinity.

2. Design Review Criteria

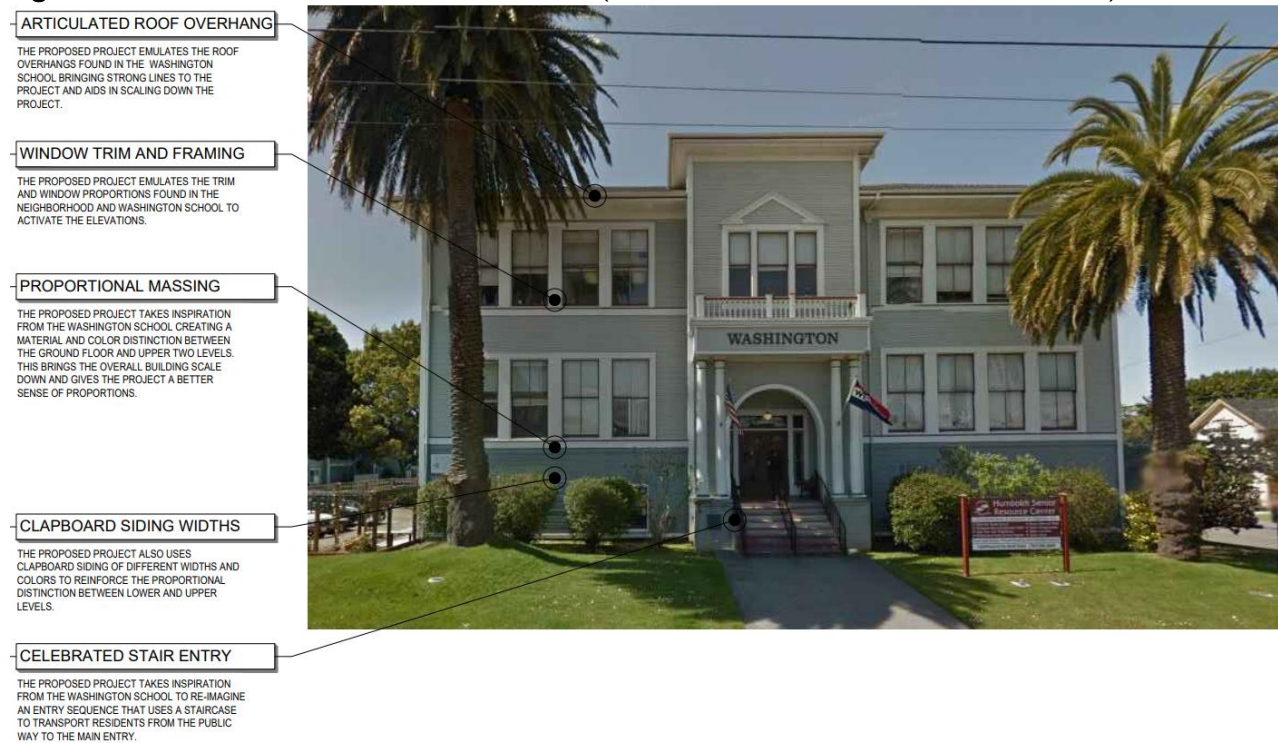
To approve a Design Review application, the Committee must find that the proposed project complies with all seven of the following Design Review Criteria to the extent they apply:

- 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 matches or complements the surrounding context or "stand out" with a contemporary and contrasting style. All buildings must minimize adverse impacts on neighboring properties when possible.*

The area surrounding the project site 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 in a variety of styles including Queen-Anne, Craftsman, and ranch-style architecture. There are a number of homes in the neighborhood on the Local Register of Historic Places, largely built between 1870 and 1910. According to the Applicant, inspiration for the design of the C and Clark development was found by examining corner lots developed with larger multi-family or institutional uses in the surrounding neighborhood such as the Municipal Auditorium, California Market, Hillsdale Apartments, and the Humboldt Senior Resource Center (HSRC). The HSRC (formerly the Washington School, built in 1902) was selected as the most suitable historic precedent given its scale and complimentary use in regard to the project proposal (senior, affordable housing project). Figure 5 (below) illustrates how design elements were taken from the HSRC to guide the architectural design in a sensitive but also contemporary way. The development's design exhibits similar character and scale to existing residences located in the surrounding neighborhood, as the development includes a series of "wings" that set

back from the property line a variety of distances to break down the overall building scale. Additionally, the Applicant has made special considerations in the development's design to fit-in with the three-story historic residence directly east of the site, such as by ensuring the C and Clark development is 8 ft shorter in height than the adjacent structure, and separated from the adjacent structure by 38 ft. For all these reasons, the new apartment building will “fit in” with nearby traditional architecture and minimize adverse impacts on neighboring properties.

Figure 5: Humboldt Senior Resource Center (historical residence used for reference)



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.

As described above, the development is one building form made up of a series of “wings” that are set back from the property line a variety of distances due to variations in horizontal articulation, creating a varied form and thus adding visual interest and human scale when experienced from the public street (Criteria 4). These wings gather around a shared courtyard and main entrance facing Clark Street that also adds visual interest

(Criteria 4). The prominent elevated primary entrance facing Clark Street, which enters into the community room, is inspired by the HSRC (Figure 5), with the design seeking to reimagine an entry sequence that uses a staircase and ADA-accessible ramp to transport the residents from the public way to the main entry (Criteria 4). All spaces between the sidewalk and proposed structure not used for access will be landscaped. Together the prominent street-facing entrance, courtyard and surrounding landscaping support an active public realm and an inviting pedestrian environment (Criteria 2). In addition, the existing cement retaining walls and 12-ft-wide sidewalks around the perimeter of the site will be retained and repaired as needed, including existing street planters. Tall (72") fencing is only proposed along the interior lot line, between the development and adjacent historic home.

Also similar to the HSRC (Figure 5), the proposed building will have articulated roof overhangs that bring strong lines to the overall project and help create a look with smaller scale (Criteria 2-4). The project features proportional massing similar to the HSRC, with a material and color distinction between the ground floor and the upper two levels,

Figure 6: Proposed Materials



FIBER CEMENT SIDING



LITHONIA WEDGE WALL SCONCE



STRAIGHT STACKED CMU RAISED PLANTERS
AND PARKING LOT WALLS



FIBER CEMENT SIDING



VERTICAL BLADE METAL FENCE

bringing the overall scale of the building down and providing the project a better sense of proportion (Criteria 2-4). The project will also use clapboard siding of different widths and colors to reinforce the proportional distinction between the lower and upper levels (Criteria 4). Additionally, the site will feature 8 short-term bicycle parking spaces and 16 long-term bicycle spaces, which will help to encourage residents and visitors to utilize non-motorized transportation, in turn supporting an active public realm (Criteria 2).

All of the design features discussed above work to create a coherent and successfully executed architectural style that is unique and modern, but also inspired by and complementary to surrounding historic architecture (Criteria 4).

5. *Materials.* *Building façades feature high-quality materials that are appropriate to the architectural style, enhance building articulation, and are compatible with surrounding development.*

The C and Clark development will be comprised of durable low-maintenance high-quality material similar to other standard modern construction, including six-inch and nine-inch fiber cement siding, fiber cement fascia and trim, metal gutters and down spouts, composite roofing, aluminum or vinyl windows, wood slat fencing, and vertical blade metal fencing (Figure 6 above). The siding style and size was chosen to emulate the siding at the HSRC to support compatibility with surround development. By utilizing two different sizes of siding (6 in and 9 in) and making material and color distinctions between the ground floor and the upper two levels (similar to the HSRC) the materials will enhance the building articulation and, by emulating the HSRC, be 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.*

The development 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 (Figure 3). The project proposes two group entrances. Doubled locked entries will be provided throughout the development, where residents would enter through one of the two locked main doors to gain access to the building, 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. The site will be required to provide dark sky compliant outdoor lighting along all pedestrian pathways as well as in the parking area adjoining the alley. An interior refuse room for solid waste storage will be accessible by only residents. All these features will contribute to the safety of the site.

7. *Landscaping.* *Landscaping features low-water-use plants appropriate for the local climate, contains native plants in compliance with §155.328.050.D (Native Plants), 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).*

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 be at least 75% native species to Eureka as listed by the California Native Plant Society, with the remainder being non-competing exotic species, in conformance with City standards. Compliance with Zoning Code landscaping standards will be ensured through the Building Permit process.

ENVIRONMENTAL ASSESSMENTS

The City's discretionary Design Review on the C and Clarke development triggers review of the project under the California Environmental Quality Act (CEQA). However, the project is exempt from CEQA pursuant to CEQA Guidelines §15183:

CEQA Guidelines §15183 (Projects Consistent with a Community Plan, General Plan or Zoning)

CEQA mandates that projects which are consistent with the development density established by existing zoning, community plan, or general plan policies for which an Environmental Impact Report (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 [PRC §21083.3(b) and CEQA Guidelines §15183(a)]. This streamlines the review of such projects and reduces the need to prepare repetitive environmental studies.

The City of Eureka certified an EIR for the City of Eureka's 2040 General Plan in conjunction with the adoption of the 2040 General Plan on October 15, 2018 (State Clearinghouse #2016102025). The C and Clark development qualifies for an exemption from additional environmental review pursuant to CEQA Guidelines §15183 because: (1) the project is consistent with the development density established by the 2040 General Plan for the project site; (2) there are no project-specific effects which are peculiar to the project or its site, and which the General Plan EIR failed to analyze as significant effects; (3) there are no potentially significant off-site or cumulative impacts which the General Plan EIR failed to evaluate; (4) there is no substantial new information which results in more severe impacts than anticipated by the General Plan EIR; and (5) the project will undertake feasible mitigation measures specified in the General Plan EIR which will be implemented through project design, compliance with regulations and ordinances, and/or through project conditions of approval. Accordingly, no additional analysis or mitigation is required. Further supporting information on how the C and Clark development is exempt pursuant to CEQA Guidelines §15183 is found in Attachment 4, including information on applicable EIR mitigation measures, which include 2040 General Plan policies, City regulations, and other laws and regulations which reduce project specific impacts to a less than significant level.

PUBLIC HEARING NOTICE

Public notification consisted of notification by mail of property owners within a 300-foot radius of the site on or before June 28, 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 June 28, 2024.

CONCLUSION

Based on the analysis above, the C and Clark 44-unit multi-family affordable housing development qualifies for the requested Density Bonus for additional dwelling units and maximum FAR development standard waiver; 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 C and Clark development is exempt from CEQA as described above.

DOCUMENTS ATTACHED

Attachment 1: Design Review Committee Resolution	pages	13-16
Attachment 2: Applicant Submitted Plan Set	pages	16-25
Attachment 3: Applicant Submitted Project Narrative	pages	25-27
Attachment 4: Supporting Information for CEQA Exemption (FTP link)	page	28
Attachment 5: Referral Comments Received	pages	29-30