



# COUNTY OF HUMBOLDT

For the meeting of: 9/4/2025

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File #: 25-1083

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**To:** Planning Commission

**From:** Planning and Building Department

**Agenda Section:** Public Hearing

**SUBJECT:**

Walford Zone Reclassification and General Plan Amendment

Assessor Parcel Numbers (APN): 017-015-034, 017-041-008

Record No.: PLN-2024-18886

Eureka area

Zone Reclassification (ZR) for the removal of the Qualified (Q) combining zone from APNs 017-015-034 and 017-041-008, that make up one legal parcel. The Q-zone currently restricts all development to those associated with medical, dental and other health related offices and facilities, per Ordinance 2078. Removing the Q-zone would allow for non-medical development (e.g. residential) to potentially move forward onsite. No change to the principal zoning (R-4) or the General Plan Land Use designation (RM) is proposed although a text amendment is also required to remove the Q zone provision that is embedded in Section 2620.15 of the Eureka Community Plan. The parcel is currently developed with medical offices.

**RECOMMENDATION(S):**

That the Planning Commission:

1. Adopt the resolution (Attachment 1), which does the following:
  - a. Finds the Planning Commission has considered the Initial Study/Mitigated Negative Declaration that was prepared for the Walford Zone Reclassification and General Plan Amendment; and
  - b. Finds the proposed project complies with the General Plan and Zoning Ordinance; and
  - c. Recommends that the Board of Supervisors approve the General Plan Amendment and Zoning Reclassification as recommended by staff, subject to the conditions of approval (Attachment 1A).

**DISCUSSION:**

**Project Location:** The project is located in the Eureka area, on the East Side of Walford Avenue, approximately 50 feet from the intersection of Wilson Street and Walford Avenue, on the property known as 3200 Walford Avenue.

**Present General Plan Land Use Designation:** RM - Residential Multiple Family, Eureka Community Plan, Density: 7-16 dwelling units per acre.

**Present Zoning:** R-4\*-Q - Apartment Professional with a Qualified combining zone overlay,

**Environmental Review:** An Initial Study/Mitigated Negative Declaration (IS/MND) was prepared and processed in compliance with CEQA and was circulated for public review from April 11, 2025 through May 10, 2025 (SCH#2025040699). Based on the whole of the record, there is no substantial evidence that the project will have a significant impact on the environment and the Mitigated Negative Declaration reflects the county's independent judgement and analysis.

**State Appeal:**

No

**Major Concerns:**

None

**Monitoring Required:**

None.

**Executive Summary:**

**Project Description:** An application for a Zone Reclassification (ZR) for the removal of the Qualified (Q) combining zone from APNs 017-015-034 and 017-041-008, that make up one legal parcel. The Q-zone currently restricts all development to those associated with medical, dental and other health related offices and facilities, per Ordinance 2078. Removing the Q-zone would allow for non-medical development (e.g. residential) to potentially move forward onsite. No change to the principal zoning (R-4) or the General Plan Land Use designation (RM) is proposed though a text amendment is also required to remove the Q zone provision that is embedded in Section 2620.15 of the Eureka Community Plan. The parcel is currently developed with medical offices.

The Proposed Project would change the zoning designation as follows:

- Current Zoning: R-4\*-Q (Apartment Professional, 6,000 sq ft minimum lot size) with medical-only Q-Zone restriction
- Proposed Zoning: R-4, B-1 (Apartment Professional, 6,000 sq ft minimum lot size)
- No change to the General Plan land use designation: RM (Residential Medium Density).

### **Build-Out Scenario Descriptions:**

Two (2) potential build-out scenarios are described below as development options for the project site. The Medical Build-Out Scenario represents a highest-intensity, larger-scale medical development project that could occur onsite under the current zoning, *with the Q-zone in place*, potentially without further discretionary review. The Residential Build-Out Scenario represents a potential highest-intensity, larger-scale residential development project that could be permitted onsite *if the Q-zone was removed*, potentially without any further discretionary review.

#### Medical Build-Out Scenario under Existing Zoning ("Medical Scenario")

Under the current R-4-Q zone, a large, multi-story medical building could be built on the parcel. In the medical maximum build-out scenario, the highest-intensity building and associated use is assumed to be a 4-story medical facility building with a 38,000 sq. ft. building footprint (total floor area of 152,000 sq. ft.). Note that this maximum build-out scenario is limited by a FAR of 1.0 and the existing Potential Developable Area of 3.5 acres.

- *Employees:* Based on the size of the medical facility building, the medical facility would have 100 staffed patient beds and would employ approximately three (3) nurse staffers per bed. Thus, there would be up to approximately 300 employees.
- *Parking:* §313-109.1.4.2.1 of the Zoning Code for medical facilities (e.g., hospitals) requires one (1) parking space per patient bed, plus one (1) parking space for every three (3) employees. Based on 100 beds and 300 employees, required parking for the Medical Scenario would be 400 parking spaces.
- *Traffic:* Assuming two (2) trips per patient per day (200 trips), and four (4) trips per employee per day (1,200 trips), projected trips per day for the Medical Scenario would be approximately 1,400.

#### Residential Build-Out Scenario under Proposed Zoning ("Residential Scenario")

Under the proposed R-4 zone, most residential uses are principally permitted, and thus a multi-story residential building (e.g., apartment complex) could be built on the parcel without requiring further discretionary review. For analysis purposes, the highest-intensity building and associated use is assumed to be 105 residential units, based on the maximum density allowed under the R-4 zone of 7 - 16 units per acre, plus an assumed density bonus of 100% due to the project location in a Housing Opportunity Zone (per HCC 314-112.1.8.1.3). The highest intensity of units is assumed to be 4-story, apartment-style housing units. This scenario is limited by the maximum density in the R-4 zone and the existing Potential Developable Area of 3.5 acres. For the purposes of this analysis and other project estimates, the maximum build-out scenario will be 105 residential units.

- *Residents:* Assuming approximately half of the units are 1-bedroom and half of the units are 2 bedroom (BR), there would be approximately 52 1-BR units and 53 2-BR units.
- *Parking:* §313-109.1.4.1 of the Zoning Code for residential parking requires one (1) parking

space per 1-BR unit and two (2) parking spaces per 2-BR units. Based off of 52 1-BR units (52 parking spaces) and 53 2-BR units (106 parking spaces), a total of 158 parking spaces would be required.

- *Traffic*: Assuming four (4) trips per parking space per day, approximately 632 trips per day would be expected under the Residential Scenario.

### **Required Findings:**

The project includes a General Plan Amendment and Zone Reclassification. Humboldt County Code and California Government Code require certain findings to be addressed for these actions. The findings are addressed in detail in the attached resolution; however the project must be generally found:

- a) to be in the public interest,
- b) to be consistent with the Guiding Principles and applicable goals of the General Plan.
- c) to be consistent with the applicable zoning regulations.
- d) not detrimental to the public health, safety, or welfare; or materially injurious to property or improvements in the vicinity; and
- e) to not reduce the residential density for any parcel below that utilized by the Department of Housing and Community Development in determining compliance with housing element law (the midpoint of the density range specified in the plan designation) unless certain site-specific findings are made.
- f) that there is no substantial evidence that the project will have a significant effect on the environment or any potential impacts have been mitigated to a level of insignificance and a negative declaration has been prepared pursuant to Section 15070 of the CEQA Guidelines.

### **Public Interest:**

As demonstrated by the County Housing Element and Regional Housing Needs Allocation, there is a significant need for housing in Humboldt County and it is in the public interest to facilitate housing development. The proposed General Plan amendment and zone reclassification provide for the potential to develop needed residential units across a range of income levels. Further, the Residential Scenario will result in less overall parking and traffic impacts to the surrounding community compared to the Medical Scenario that could otherwise occur as a principally permitted use.

### **General Plan Guiding Principles and Goals:**

#### *Guiding Principles (GP Section 1.4):*

The GPA/ZR will implement the policy focus of the Housing Element and provide a range of housing opportunities for a variety of household income levels and will create job opportunities to construct the housing and install the appropriate services-related infrastructure. The property is located in a Housing Opportunity Zone and proposes a range of residential units that is consistent with the

County's priority to create more housing opportunities for residents.

The southern portion of the subject property is part of a greenway area that connects to Freshwater Slough. The proposed residential units would not negatively impact these natural resources and would allow a balance of residential uses and resource protection to occur. The proposed development has been analyzed in the IS/MND and was shown to have a less than significant impact to natural resources.

Land Use:

The project site is located within the Urban Development Area and within an adopted housing opportunity zone intended to facilitate additional housing development and is suitable for future development due to its existing and potential connection to public water and sewer systems. Removing the Q-zone would allow for residential development and an increase in residential opportunities. In the Residential Scenario, a maximum of 105 units could be constructed onsite. This could account for additional units toward the County's RHNA numbers that were previously unconsidered during the County's Housing Element Residential Land Inventory. These additional units would not be possible with the current Q-zone overlay, and would help to support the County's Housing Element and Land Use Element policies regarding fulfillment of the County's RHNA units. Additionally, the potential Residential Scenario supports infill development located in close proximity to transit stops, existing residences, and commercial operations. The subject property is located within 0.20 miles of a transit stop and a commercial center.

Circulation:

The IS/MND analyzed Vehicle Miles Traveled (VMT) for the Residential Scenario that could materialize after removal of the Q-zone versus the development of the Medical Scenario. The Residential Scenario would produce approximately 5,056 daily miles while the Medical Scenario would produce approximately 12,224 daily miles. The Residential Scenario would have far less impact than the Medical Scenario that could otherwise be developed with ministerial review.

Level of Service (LOS) estimates for maximum build-out under the Medical Scenario suggests a maximum of 1400 daily trips whereas build-out under the Residential Scenario would create over 50% less new traffic (632 trips). This shows that the proposed zoning change would create the potential for considerably lower traffic volumes than what would otherwise be possible with ministerial development, such as build-out with principally permitted medical offices. As part of recent commercial redevelopment in the area (the Safeway project), a traffic signal was installed at the intersection of Walford Avenue and Harris Street to address potential traffic impacts. The signals at Walford and Harrison still serve to effectively mitigate localized LOS concerns linked to development in this area. It is reasonable to conclude that the proposed zoning change would not add traffic volumes resulting in changes to LOS conditions in excess of those already anticipated under the General Plan.

Additionally, the project site is located near existing commercial, residential, and medical development, and is well-connected to pedestrian, bicycle, and public transit modalities of transportation, with two bus stops within walking distance.

Housing:

Housing Diversity calls for an adequate supply of all types of housing affordable for all income levels in all areas of the County. While there is no specific development plan as part of the proposed GPA/ZR, the zoning change would allow for up to 105 apartment units that could provide a range of housing opportunities for various income levels. The zoning change would also promote infill and redevelopment of partially vacant and underdeveloped land within an Urban Development Area and Housing Opportunity Zone.

The location of the proposed Residential Scenario would potentially provide multi-family and workforce housing opportunities near existing residential, business, medical, and community services. The nearest transit stop is approximately 0.2 miles away, the nearest elementary school is roughly ¼-mile away, and more extensive employment, commercial, health and other services and opportunities are approximately ½-mile to the north along Harrison Avenue and along Myrtle Avenue.

Biological Resources:

The proposed project is to remove a Qualified combining zone, which would not directly impact the current biological resources on the property. The Potential Developable Area, where the Residential Scenario would be developed, is located outside of all SMA buffers, and no trees would be removed. Further, the site does not contain any mapped wetlands (USFWS National Wetland Inventory, 2024), with the nearest mapped wetland associated with Ryan Creek, approximately 2,300 feet southeast of the site. The entirety of the Potential Developable Area is either already developed or was recently cleared during approved timber activities. A report conducted by Hohman & Associates Forestry Consultants indicated that there were no wetland areas onsite within the Potential Developable Area prior to or after timber operations were conducted onsite.

The development of the project included referrals to and consultation with the California Department of Fish and Wildlife (CDFW) who provided recommendations regarding project design and project mitigation measures which have been considered and, where feasible, incorporated into the project. No noise- or vibration-generating construction activities within 100 feet of the edge of riparian and tree area shall occur between March 15th to August 15th, when birds may be nesting on the adjacent property. CDFW also conducted numerous site visits and has concluded that there would not be any significant impacts to the surrounding biological resources, as the project is conditioned. A condition of approval would require a Development Plan to be filed that would require appropriate vegetation to be installed as part of any future development.

Safety and Hazards:

The project site is located within an SRA and within the Humboldt No. 1 Fire Protection District.

According to Humboldt County Web GIS mapping (2024), the Proposed Project Area is located in an area of Moderate Fire Hazard Severity Zone within the SRA. The Proposed Project involves a GPA and Zone Reclassification, with no inherent risk of fire increase. Any onsite development facilitated from the approval of the Proposed Project would be within the Potential Developable Area and designed to meet current building code standards for fire safety. The Proposed Project would be required to comply with the State's "Minimum Fire Safe Regulations" which establish the minimum Wildfire protection standards of the California Board of Forestry and Fire Protection. State Minimum Fire Safe Regulations provides specific standards for roads providing ingress and egress, signing of streets and buildings, minimum water supply requirements, and setback distances for maintaining defensible space.

Additionally, the subject parcel is located in an area of relative stability, is not located within an Alquist-Priolo Fault Hazard Zone, nor is it within an area of potential liquefaction. The project site is not located in a tsunami hazard zone and does not reside within an area susceptible to coastal inundation related to sea level rise (1 meter). The parcel is not located within a FEMA 100-year Flood Zone.

#### **Zoning Regulations:**

The R-4 (Apartment Professional) applies to areas suitable for higher density residential uses and for professional and business offices and institutional uses. Removal of the Qualified combining zone will facilitate the potential for residential development consistent with this zone classification. The potential developable area and Residential Scenario conform with setbacks, density and other considerations, and upon approval of the proposed project, any future residential development will be subject to the standards and other regulations set forth by the zoning code, such as lot coverage, building height, etc., to remain consistent with the zoning standards.

#### **Public Health, Safety, or Welfare**

The proposed project was referred to and reviewed by numerous agencies, including the Humboldt County Planning Division, County Building Inspection Division, County Department of Public Works, County Division of Environmental Health (DEH), California Department of Fish and Wildlife (CDFW), California Department of Forestry and Fire Protection (CALFIRE), City of Eureka, local Native American Tribes, Humboldt Community Services District, and Humboldt Bay Fire Protection District, among others. The respective departments/agencies have recommended conditions, where appropriate, to ensure that the project will not have an adverse effect on the health, safety, and welfare of persons either residing or working in the neighborhood. No evidence has been submitted that the project as conditioned and mitigated will be detrimental to public health, convenience, safety, and welfare. Furthermore, no evidence has been submitted that indicates that properties within the vicinity will be physically damaged by the proposed GPA/ZR changes and subsequent potential for residential development. In response to the public circulation of the Initial Study and Mitigated Negative Declaration one comment was received regarding unpermitted shipping containers being located on the property and creating an attractive nuisance. This project is conditioned to require these containers either be removed or obtain building permits prior to the project being presented to the

Board of Supervisors for consideration.

**Residential Density:**

The GPA and zone reclassification do not decrease the total number of units which could be placed on the site but rather are consistent with the residential densities specified for the project area. Should the proposed GPA/ZR be approved, the highest-intensity building and associated use is assumed to be 105 residential units, based on the maximum density allowed under the R-4 zone of 7 - 16 units per acre, plus an assumed density bonus of 100% due to the project location in a Housing Opportunity Zone (per HCC 314-112.1.8.1.3). This scenario is limited by the maximum density in the R-4 zone and the existing Potential Developable Area of 3.5 acres.

Humboldt County is significantly behind in providing housing to its share of regional housing obligations as mandated by the State. The county's projected housing needs for the current period (2019-2027) are 1,413 units spread across all housing income categories. The approval of the proposed GPA/ZR could facilitate the development of 105 residential units, and providing housing for a variety of income categories is a priority under the County Housing Element.

**Tribal Consultation:**

Native American Tribes were consulted during discretionary project review for the identification, protection and mitigation of adverse impacts to significant cultural resources and were afforded the opportunity to review and provide comments to the County early in project review and planning about known or potential Tribal cultural resources located in project areas within their respective tribal geographical area of concern. The Wiyot Tribe, Bear River Band of the Rohnerville Rancheria, Blue Lake Rancheria, and Cher-Ae Heights Indian Community of the Trinidad Rancheria were contacted as part of the referral process as soon as the project was submitted to the County. Additionally, formal consultation pursuant to SB 18 and AB 52 was offered. Representatives either responded that no further consultation was desired or chose not to respond. Standard inadvertent discovery protocols for any future development are provided as project conditions.

**Environmental Review:**

The Zone Reclassification and General Plan Amendment are discretionary in nature and constitute a "project" subject to compliance with the California Environmental Quality Act ("CEQA"). Substantial evidence supports the conclusion that there will be no significant adverse effects on the environment, based upon the Lead Agency's independent judgment and analysis.

The project involves removing the Qualified combining zone which currently restricts the parcel development to those associated with medical, dental, and other health-related offices and facilities. Reclassifying the parcel from R-4-Q to R-4 would enable the development of a residential apartment project. The Initial Study/Mitigated Negative Declaration has found that there would be a Less than Significant Impact from the proposed zone reclassification and new residential use. Based on the whole of the record, there is no substantial evidence that the project will have a significant impact on



the environment and the Mitigated Negative Declaration reflects the county's independent judgement and analysis.

The draft Initial Study/Mitigated Negative Declaration was circulated for public review from April 11, 2025 to May 10, 2025. No comments from public agencies were received and only one comment from the public was received. As mentioned above, the commentor expressed concern about the unpermitted shipping containers that are located on the property and its potential as a hazard and public nuisance. The project is conditioned for the applicant to obtain building permits or remove the containers prior to the project being presented to the Board of Supervisors for consideration.

### **Staff Recommendation**

Because the project involves a General Plan Amendment and Zone Reclassification, the Planning Commission must make a recommendation to the Board of Supervisors who will make the final decision on the project. Staff recommends that the Planning Commission recommend that the Board of Supervisors adopt the IS/MND, adopt the MMRP, make the findings for approval and approve the proposed project as recommended by staff and subject the recommended conditions of approval.

### **OTHER AGENCY INVOLVEMENT:**

The project was referred to responsible agencies and all responding agencies have either responded with no comment or recommended approval or conditional approval. (Attachment 5).

### **ALTERNATIVES TO STAFF RECOMMENDATIONS:**

1. The Planning Commission could elect not to recommend certification of the IS/MND and approval of the project. This is not recommended as this is a well-intentioned project with the potential for multiple types of housing which will meet critical needs in the County.
2. The Planning Commission could elect to recommend approval of one of the identified project alternatives. This is not recommended as this is a well-intentioned project with multiple types of housing which will meet critical housing needs in the County.
3. The Planning Commission could elect to recommend that the applicant make amendments to the project not currently considered in the IS/MND. If this alternative is chosen staff recommends a continuance of this project to a date uncertain to enable the County to complete any additional environmental review necessary.

### **ATTACHMENTS:**

Attachment 1 - Draft Resolution

Attachment 1A - Conditions of Approval

Attachment 1B - Mitigation Monitoring and Reporting

Attachment 1C - Site Plan

Attachment 2 - Location Map

Attachment 3 - CEQA - Initial Study / Mitigated Negative Declaration

Attachment 4 - Applicant's Evidence in Support of the Required Findings

Attachment 4A - Project Description

Attachment 4B - Resolution 23-130 accepting the General Plan and Rezone Petition

Attachment 4C - Biological Scoping Report

Attachment 4D - Ordinance No. 2078

Attachment 5 - Referral Agency Comments and Recommendations

Attachment 6 - Eureka Community Plan Text

Attachment 7 - Draft Board of Supervisors Resolution

Attachment 8 - Planting List for Walford Property

Attachment 9 - Public Comments

**Applicant:**

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