

DESIGN REVIEW COMMITTEE

STAFF REPORT

September 24, 2025

Title:	Laqilh Hou Daqh “Where the Elders Are” Wiyot Tribe Housing Development
Project:	Density Bonus DB-25-1 and Design Review DR-25-3
Location:	6 th and L Street City Hall Parking Lot
APN:	001-192-004
Applicant:	Laura Herron of Travois Consulting (Authorized Agent)
Property Owners:	Wiyot Tribe / Dishgamu Humboldt Community Land Trust
Purpose/Use:	Redevelop a 0.3-acre, City-owned parking lot into a five-story, senior housing development with 52 units, a second-floor terrace, commercial kitchen, and other community amenities, and a ground-level garage with 19 spaces reserved for City use.
Complete Application:	August 18, 2025
Deadline for Action:	November 18, 2025
General Plan:	Downtown Commercial (DC)
Zoning:	Downtown (DT)
California Environmental Quality Act (CEQA):	Exempt under California Public Resources Code §§21159.21 and 21159.23 and CEQA Guidelines §§15192 and 15194 (Affordable Housing and Residential Infill Projects); Environmental Document ED-23-0017 and State Clearinghouse No. 2023070391
Staff Contact:	Samuel Griffard, Assistant Planner
Recommendation:	Hold a public hearing; and Adopt a resolution conditionally approving the project.
Motion:	“I move the Design Review Committee adopt a resolution conditionally approving the Density Bonus and Design Review for the Laqilh Hou Daqh “Where the Elders Are” Wiyot Tribe Housing Development at 6 th and L Streets.”

Figure 1: Location Map

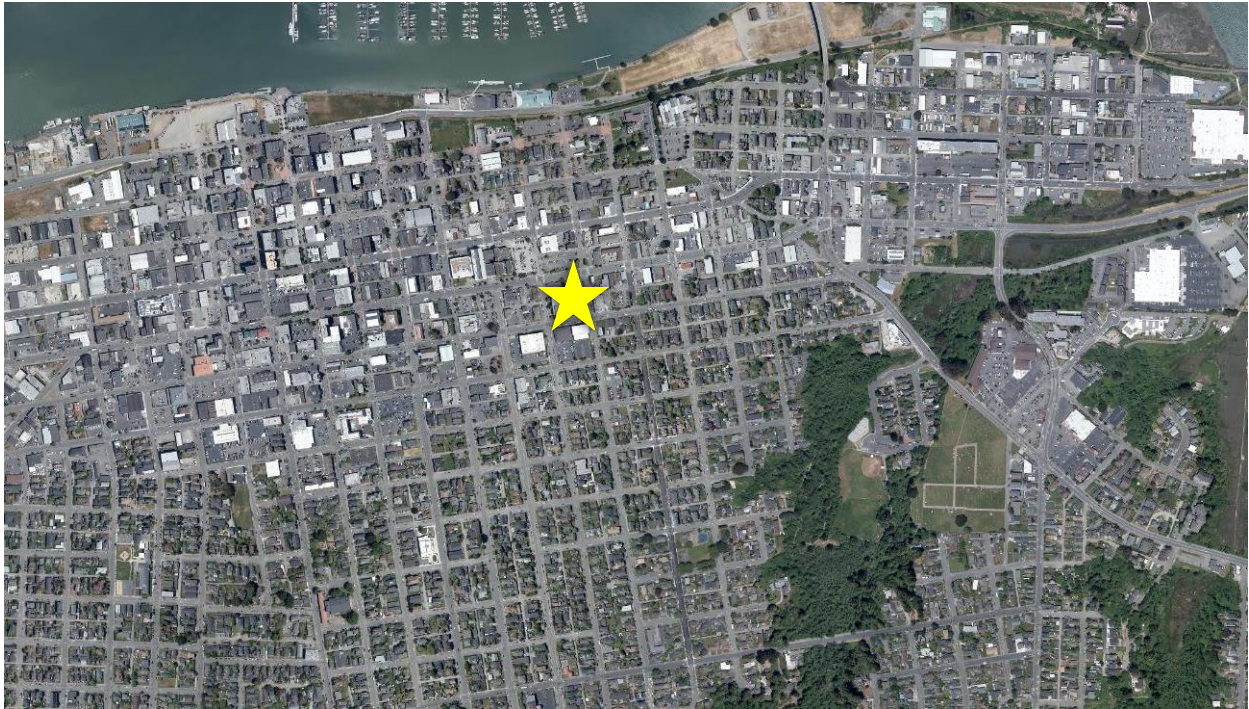


Figure 2: Vicinity Map (red = project site)



PROJECT DESCRIPTION

The Applicant, Laura Herron of Travois Consulting, on behalf of the Wiyot Tribe, proposes to redevelop the 13,200-square-foot (sf) (0.3 acre) City-owned parking lot at 6th and L Streets (Figure 2) with a five-story, 55,310-sf senior housing building (the Project) (Figure 3). The development will have an approximately 12,800-sf footprint and will include 52 units, a community room, a commercial kitchen, a second-floor, south-facing terrace, a backup generator, short and long-term bicycle parking, perimeter landscaping, a ground-level parking garage with 19 spaces for City use (accessed from L street and the alley), a single van-accessible ADA space for use by the affordable housing development, and associated signage. No on-site parking will be provided for tenants, and state law specifies that the City cannot require any, as the Project is located within one-half mile of a major transit stop (at 3rd and H Streets [California Public Resources Code §65863.2]).

The Applicant proposes to use two concessions/incentives as allowed by State Density Bonus law to deviate from: (1) a City design standard that limits blank walls facing public streets (Eureka Municipal Code [EMC] §155.312.060), and (2) a City standard that establishes minimum laundry machine requirements for multi-family projects (EMC §155.304.100) (Project No. DB-25-1). In addition to a Density Bonus, the project is subject to Design Review pursuant to EMC §155.412.040, which requires Design Review for new buildings 500-sf or larger in the Downtown Zoning District (DT District) (Project No. DR-25-3). The Applicant also intends to apply for a Sign Permit at a later date, once a sign has been designed in compliance with City standards.

Figure 3: Rendering of Proposed Building (view from 6th Street)



Background

In December 2019, the City Council adopted the 2019-2027 Housing Element, including Implementation Measure IMP H-34 (Affordable Housing on City-owned Properties), which identified 14 City-owned parcels at eight sites for sale or lease to affordable housing developers, with the goal of constructing at least 332 deed-restricted affordable housing units by 2028. On April 4, 2023, City Council reviewed and approved a Request for Proposal package soliciting affordable housing projects on both the Project site and another City-owned property at 5th and D Streets. On July 18, 2023, City Council declared the Wiyot Tribe/ Dishghamu Humboldt Community Land Trust (CLT) as the preferred proposer and authorized the City Manager to proceed with a Memorandum of Agreement to sell or lease both sites to the Wiyot Tribe/ Dishghamu Humboldt CLT for the development of affordable housing. At that time, the City Council adopted a resolution (Resolution No. 2023-39) finding redevelopment of the sites into affordable housing was exempt from CEQA, based on a supporting CEQA memo prepared for both sites (See Attachment 4 to review the resolution and filed Notice of Exemption). Additional information regarding the environmental review is provided in the Environmental Assessment section of this report.

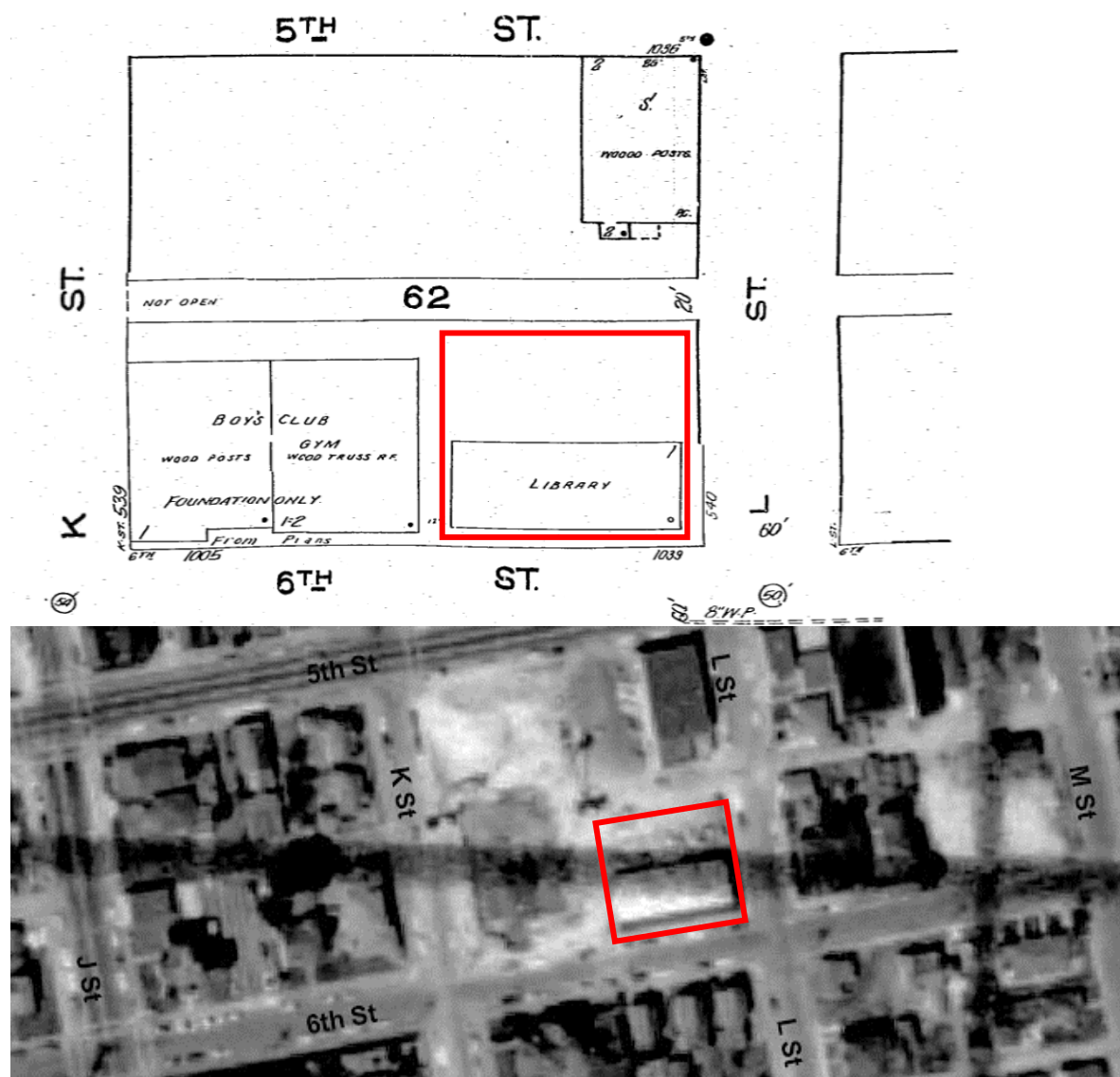
In March of 2025, the City of Eureka and the Wiyot Tribe/ Dishgamu Humboldt CLT entered into a Disposition and Development Agreement (DDA) covering both the Project site and the 5th and D site, establishing the terms and conditions for conveying the property to the developer and for the development and operation of both sites. As required by the DDA, the Wiyot Tribe, Travois, and the City hosted a public meeting later that month to inform the community and seek input on both the subject Project and the 5th and D development, which is planned to include 41 family units and a daycare facility. In May of 2025, the Applicant participated in the City’s Development Review process, submitting preliminary plans to relevant City departments for review and comment to better inform the subsequent permit applications.

The Project became fully funded in the summer of 2025, after receiving two Affordable Housing Program (AHP) grants (through FHLBank San Francisco in partnership with Redwood Capital Bank; and through the Federal Home Loan Bank of Des Moines in partnership with Umpqua Bank) as well as Low-Income Housing Tax Credits. The mid-June allocation of tax credits positions the Wiyot Tribe to close financing in December, with construction anticipated to begin in early 2026 and be completed before the end of 2027.

Project Setting

The 6th and L Street parking lot where the Project is proposed consists of 28 spaces reserved on weekdays for City fleet vehicles and City Hall employees. The parking lot is not part of the City’s Parking Assessment District, unlike other City-owned parking lots that have recently been put up for sale/lease for affordable housing development under the Housing Element. The subject property comprises one-fourth of a City block that was undeveloped prior to the 1950s, as indicated by the 1949 and earlier Sanborn Fire Insurance Maps on file with the City. By 1955 (the next year for which Sanborn Maps are available), a library had been constructed on the site (Figure 4). Eureka’s City Hall was built in the late 1950s and opened in 1959. Sometime between 1958 and 1964 (the next year for which Sanborn Maps are available), the library was demolished and replaced by a parking lot, presumably to serve City Hall.

Figure 4: 1955 Sanborn Insurance Map and 1958 Aerial Imagery (project site = red)



The subject property lies near the southern edge of Eureka’s DT District surrounded by Eureka City Hall, government offices, law firms, restaurants, hotels, residences, and other commercial services. The main entrance of the proposed development will face 6th Street, which is a one-way westbound minor arterial providing direct connectivity to Broadway (Highway 101). 6th Street includes curb extensions (bulb-outs) at intersections for shortened pedestrian crossings and a striped bike lane (westbound), which works in conjunction with a bike lane on 7th Street (eastbound) and connects to north-southbound bike lanes on J, H, and I Streets. Additionally, public transit is accessible via the Eureka Transit Service (Purple Route), with a sheltered bus stop directly adjacent to the proposed development on 6th Street, that will be improved within the next two years with an Affordable Housing and Sustainable Communities grant secured through the Linc Housing Development which is under construction one block to the east (funded improvements include a bus boarding bulb-out, street trees, street lights, and bike parking). Other bus stops located nearby include stops at 5th and K Streets (Highway 101 North)

and 4th and K Streets (Highway 101 South), and a major transit stop (the future “Earth Center” transit station) less than one half mile away at 3rd and H Streets.

Figure 5: Surrounding Zoning Districts (subject property highlighted in green)



DENSITY BONUS ANALYSIS

Under State Density Bonus law (California Government Code [CGC] §65915 – 65918), housing development projects proposing five or more units and including deed-restricted affordable housing are allowed to exceed a local jurisdiction’s maximum density limits and deviate from other development standards and zoning code requirements in exchange for below market rate rents. Greater benefits are available for projects that reach higher percentages of affordability.

Of the 52 dwelling units proposed, 36 will be reserved for very-low income households earning at or below 30-50% Area Median Income (AMI), 15 units for low-income households earning at or below 60% AMI, and one market rate manager’s unit. Because all proposed housing units will be deed-restricted affordable for lower-income households exclusive of any manager’s units, the Project qualifies for up to five concessions/incentives from City development regulations (CGC §65915.b.1.G, §65915.d.2.D, and §65915.f.3.D.ii). Concessions/incentives are defined as “(a) reduction in site development standards or a modification of zoning code requirements or architectural design requirements ... that result in identifiable and actual cost reductions, to provide for affordable housing costs” (CGC §65915.k).

The Applicant is requesting:

- I) One concession/incentive to deviate from City standards for multi-family laundry facilities. EMC §155.304.100 (Multi-Family Laundry Facilities) specifies that all new construction of a multi-family residential use must provide either private laundry facilities in each dwelling unit or a common laundry facility with at least one clothes washer and dryer for each six dwelling units. The Project will provide hookups for washers and dryers in each unit, allowing tenants to bring their own appliances; and, the Project proposes a communal laundry room with six washers and dryers, which is fewer than the nine required for 52 units. Since the Project does not provide individual washer and dryers, and the communal

laundry room falls short of the required number of washers and dryers, the proposed laundry facilities do not meet City standards.

- 2) One concession/incentive to deviate from the Blank Wall standards in EMC §155.312.060, which requires that the area of a blank building wall fronting a public street may not exceed a square area where the height and width are both 10 feet. There is one blank wall on the south-facing façade and two on the east-facing façade (Attachment 2, pages 21 and 22).

The City may deny concessions/incentives on the basis of substantial evidence that the concession/incentive does not result in identifiable and actual cost reductions, would be contrary to state or federal law, or would have a specific, adverse and unavoidable impact on public health, safety or on a listed historic property (CGC §65589.5.d.1). Pursuant to CGC §65915.d.4, the City has the burden of proof for the denial of a requested concession/incentive. The Applicant has submitted a narrative detailing the cost savings provided by the requested concessions (Attachment 2, page 23), and the City has no substantial evidence to support any of the aforementioned allowable justifications for denial. Therefore, the City must approve the requested deviations from laundry facilities and blank wall standards.

DESIGN REVIEW ANALYSIS

To approve a Design Review application, the 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 applicable Design Review criteria in EMC §155.412.040.J (Design Review Criteria).

When acting on a Design Review application, EMC §155.412.040.I (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.

A. Public Health, Safety, and Welfare

The Project has undergone a comprehensive review to confirm consistency with applicable development standards, environmental regulations, and agency requirements, and is conditioned to address potential impacts identified through both environmental review and the referral process.

CEQA Environmental Review

Although not specific to the street-facing portions of the Project, and instead applicable to the development as a whole, the previously adopted CEQA exemption for the Project (Attachment 4), discusses a number of City policies and standards that the Project must adhere to, including:

1. Completing public improvements to sidewalks, curbs, and alleys in the vicinity;
2. Connecting water, sewer, and stormwater services to City standards;

3. Obtaining an Encroachment Permit and providing a Traffic Control Plan for work in any public rights-of-way during construction;
4. Preparing and implementing a construction-phase Erosion and Sediment Control plan;
5. Preparing and implementing a post-construction Stormwater Control Plan consistent with the Humboldt Low Impact Development Manual;
6. Implementing standard construction-phase dust control measures;
7. Installing filters with a minimum efficiency reporting value of 13 (MERV-13) in the indoor air heating, ventilation, and air conditioning (HVAC) systems for proposed housing units;
8. Limiting construction noise to standard construction hours;
9. Incorporating acoustical insulation treatments to ensure interior noise remains below 45 dBa for residents; and,
10. Following the City's standard Inadvertent Discovery Protocol for buried archaeological and cultural resources, allowing for a tribal monitor if requested by one of the Wiyot-area tribes.

City Department Requirements

Referrals were sent to agencies and City departments with interest in, or jurisdiction over, the property and its intended use. The Engineering Department has been working closely with the Applicant on project design, and submitted referral comments largely reiterating and expanding on standard City requirements previously identified during environmental review. These include requirements for completing public improvements (such as alley paving), connecting water and sewer utilities, working within public rights-of-way, and implementing stormwater and erosion control measure for both construction and post-construction phases (#s 1-5 listed above). The Engineering Department will review the future Building Permit application for compliance with these requirements. A condition has been added to the Design Review authorization to notify the Applicant of the need to obtain a Building Permit and to address the Engineering Department's referral comments as part of that process. Additional conditions have also been included to ensure compliance with air quality, noise, and archaeological resource requirements (#s 5-9 listed above).

Other Agencies

In response to the Project referral, Pacific Gas and Electric Company (PG&E) requested the Applicant contact them to initiate relocation of any gas or electric services affected by the Project, and to ensure all trees and brush planted within the public utility easement maintain a minimum distance of five feet from existing underground facilities. A condition has been added to the Design Review authorization to notify the Applicant of the need to obtain all necessary authorizations from PG&E.

The Humboldt County Department of Environmental Health (DEH) also responded to the Project referral and requested that the Applicant coordinate with the City's solid waste hauler for collections and obtain the necessary authorizations for the proposed commercial kitchen, and hazardous waste generation, as needed. A condition has been added to the Design Review authorization to alert the Applicant to the need for DEH authorizations.

No requests were made by the Wiyot-area tribes during the referral period; regardless, as specified in the CEQA exemption, the Project is required to follow the City's standard inadvertent discovery protocol in the event archeological resources are encountered during ground-disturbing construction activities, and this standard has been added as a condition of the Design Review approval.

All referral responses are included in Attachment 3.

City Zoning Code Standards

The Project conforms to specific development standards for the DT District (i.e. maximum density, FAR, site coverage, and height, etc.) under EMC §155.204.030, as well as all other applicable Zoning Code standards, except for the laundry and blank wall standards described in the Density Bonus section above. The Applicant has not yet provided enough information to demonstrate compliance with all of the City's landscaping and outdoor lighting standards, so a condition of approval has been added to the Design Review authorization notifying the Applicant of the need to provide complete and compliant landscaping and outdoor lighting plans and specifications during the Building Permit phase.

As proposed and conditioned, the Project will comply with applicable Zoning Code requirements, and based on the referral comments received, there is no indication that the Project, as conditioned, would be detrimental to the public health, safety, or welfare, or materially injurious to the properties or improvements in the vicinity.

B. Design Review Criteria

To approve a Design Review application, the Committee must find that the proposed project complies with all seven of the Design Review Criteria listed below. Staff's analysis follows each criterion, and the Applicant's architect's consistency analysis is provided in Attachment 2 (pg. 17-20).

- I. 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 surrounding neighborhood consists of a mix of modern and historic office and government buildings to the north and west, and residences of varying age, architectural style, and historic significance to the south and east. The Project is designed to stand out with a contemporary and contrasting style that draws inspiration from traditional Wiyot homes and structures, honoring the Tribe's cultural heritage and contributing to Eureka's unique character as the Tribe's ancestral territory. At the same time, the Project includes a variety of design elements that complement both the modern design of City Hall and nearby offices through the use of a glass façade and large planes, while also providing visual interest through varied roof forms, articulated facades with projecting and recessed planes, and design treatments such as large areas of glazing, including glass windows and doors, that reduce perceived mass. In addition, the second-floor landscaped terrace provides visual relief and greenery that softens the scale of the building on the 6th Street side. For these reasons, the Project enhances the design quality of the area and Eureka's unique character and distinctive sense of place, consistent with Design Review Criteria I.

2. Pedestrian Environment. Buildings incorporate design features that support an active public realm and an inviting pedestrian environment.

The Project includes several features that improve pedestrian safety and contribute to a more engaging and comfortable streetscape. The new building frames 6th Street and the 6th/L corner, establishing a strong street edge and active frontage, while the parking structure is tucked behind the building to minimize its visual impact, supporting a more inviting pedestrian realm in accordance with EMC §155.324.060.B (Parking Placement on Site).

The ground-level, street-facing building walls include large windows at pedestrian eye level, and these windows provide views into the community room and lounge, busy gathering spaces that provide visual interest for people walking by. A prominent main entrance and a second-floor terrace on 6th Street add further activity and visual interest, while upper-story balconies overlook the sidewalk, creating additional opportunities for casual observation and interaction that make the street feel lively and safe. The terrace also helps to break up the massing of the building, softening what could otherwise be an imposing block.

Additional pedestrian-friendly features that create human-scale visual interest and contribute to a more pleasant pedestrian environment include perimeter landscaping that buffers the building from the surrounding sidewalks, a mix of ground-level façade materials and textures, and continued accommodation of wide sidewalks and the existing bus stop. Both temporary visitor bike parking and long-term bike storage will be added to encourage active transportation.

Together, these elements transform a former surface parking lot into a dense and vibrant residential development that enhance the pedestrian experience along 6th and L Streets. For these reasons, the Project is consistent with Design Review Criteria 2.

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.

Per the Applicant, the development honors and is inspired by the traditional Wiyot home form. Key design elements that intentionally echo traditional form include the sloped shed roofs and the circular main entry portal. In addition, according to the Applicant, the building materials and color palette reference the region's forests, bay, ocean beaches, and rocky rivers. The design of the building is also modern in appearance, with prominent use of glass and modern materials. The Applicant has incorporated a stepped terrace to open up the massing of the building from the street, creating an interesting shape as opposed to an imposing block rising directly from the sidewalk. The terrace and various angles of the walls and roof set the proposed building apart from its neighbors (Eureka City Hall, the Fidelity National Title building, and the County Courthouse) and are visually distinct. As designed, the building is a coherent and creative fusion of modern and traditional design, consistent with Design Criteria 3.

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.

The street-facing building façades incorporate a range of architectural features that both meet City standards and provide visual interest. EMC §155.312.050 (Architectural Features) requires the street-facing portions of new buildings to incorporate at least two architectural features out of a list of fifteen, and both the south and east-facing facades include three each, exceeding the minimum. EMC §155.312.020.D (Equivalent Degree) specifies that buildings with multiple street-facing frontages need to have an equivalent quality of materials and degree and quality of detailing. As shown below, the Project also meets this standard, with both street-facing facades incorporating similar materials and exceeding City standards for required architectural features.

South-Facing Facade

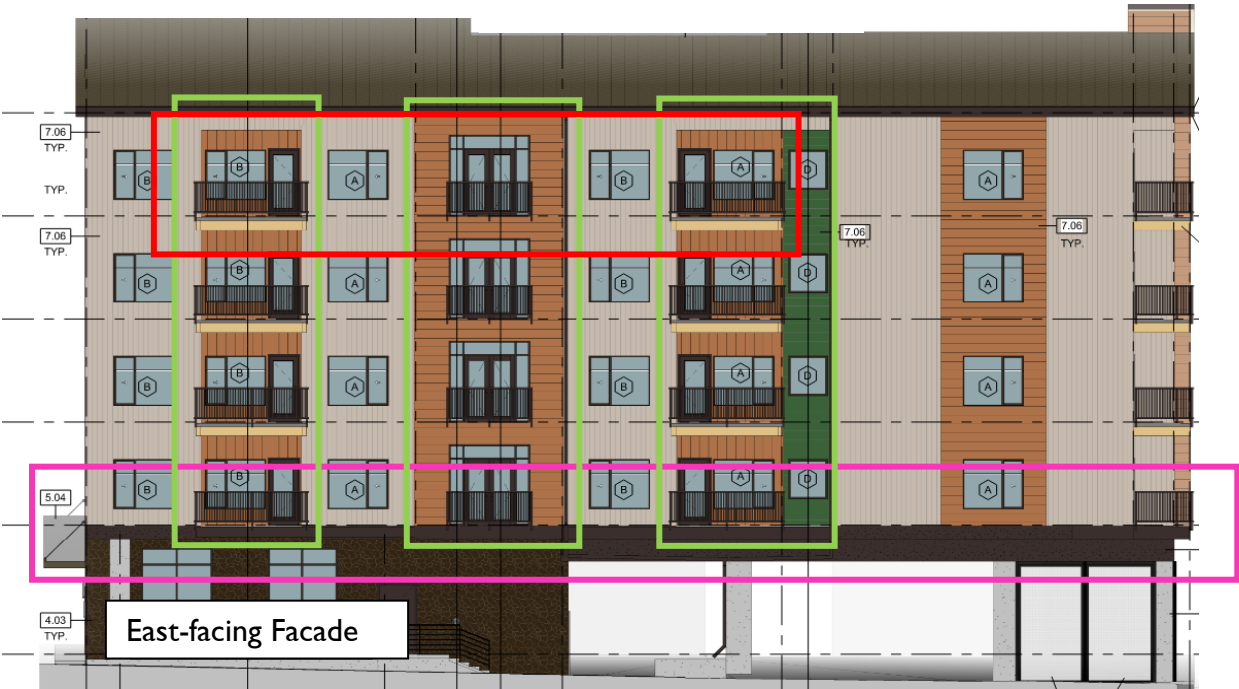
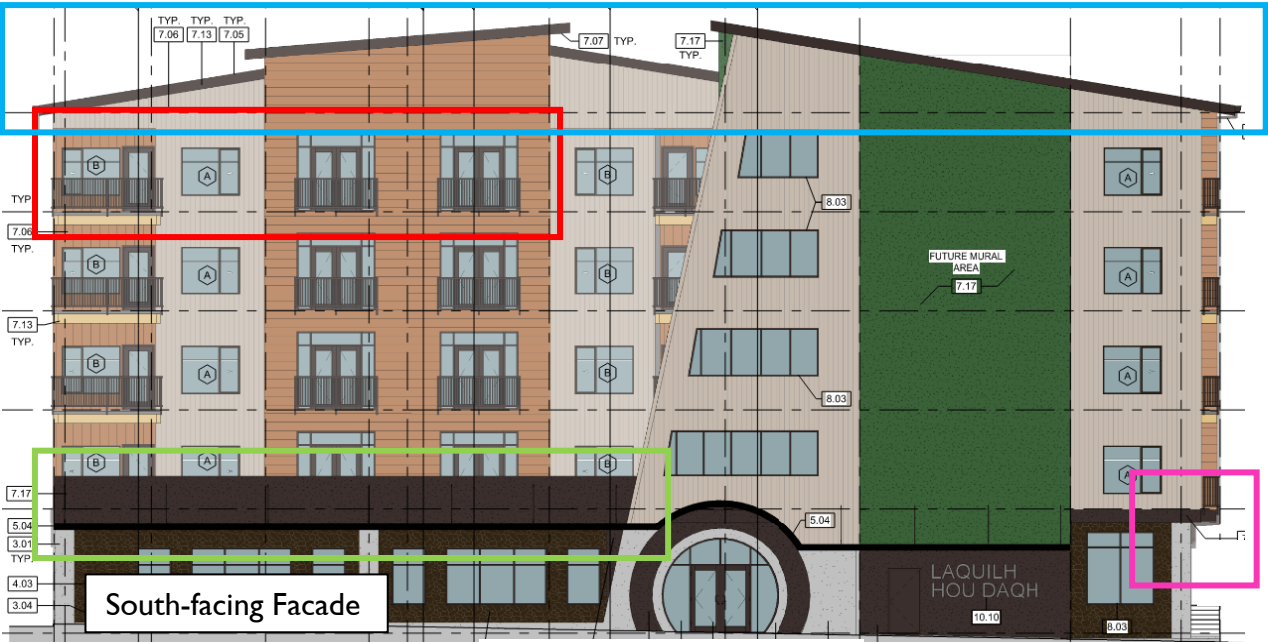
The south-facing façade (facing 6th Street) incorporates balconies along 23% of its length (28 linear feet of the 120-foot frontage), exceeding the minimum standard of 20% to receive credit for this architectural feature under EMC §155.312.050.A.5 (Balconies). Additionally, this façade prominently features four different rooflines of varying height and pitch. Since there is no consistent roofline to measure against, Staff has determined 100% of the south-facing roofline displays variation in form, exceeding the minimum of 40% to receive credit for “Roof Form Variation” under EMC §155.312.050.A.1. The second through fifth floors of the southwest side of the building are stepped back approximately 30 feet to create the second-floor terrace, occupying approximately 65-feet or 54% of the 120-foot-long façade, exceeding the minimum of 25% to receive credit for “Horizontal Articulation” under EMC §155.312.050.A.3.

East-Facing Facade

The east-facing façade (facing L Street) appears more as a conventional apartment block, but still displays a variety of architectural features. As with the south-facing façade, balconies are a prominent feature, covering approximately 31 feet, or 29% of the 108-foot length of the building. The first floor is recessed approximately two feet to accommodate planters and walkways, and the entire length of the building projects above, qualifying the entire length of this side for the “Cantilevered Upper Story” architectural feature under EMC §155.312.050.A.4 (visible on the right side of the south-facing façade in Figure 6, below). Finally, 37% of the east-facing building wall, from the second floor upwards, has projections or recesses of over one-foot deep, exceeding the standard for horizontal articulation.

Figure 6: Highlighted Architectural Features (legend at top; south-facing façade first and east-facing façade second)

Highlight Color and corresponding Architectural Feature			
Blue	Roof Form Variation	Pink	Cantilevered Upper Story
Red	Balconies	Green	Horizontal Articulation



The Project also conforms to the City’s standard for building entries, having one clearly visible, recessed and covered entrance connected to the sidewalk on 6th Street, in accordance with EMC §155.312.040 (Building Entries). The entrance, a reference to traditional Wiyot entries, is a round portal with contrasting concrete and stucco trim, encircling a glass door and windows, further adding to the unique style of the building.

While the Project does have several blank walls (detailed previously under the Density Bonus section), the largest, south-facing blank wall is intended to be covered with a mural, helping mitigate the blank space and providing further visual interest to the façade.

As proposed, the street-facing façades feature eclectic design elements that provide distinction and visual interest, consistent with Design Review 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.

All proposed building materials are durable and compatible with the surrounding mixed-use context, including the neighboring residences, Eureka City Hall, and the various government and office buildings in the vicinity. The ground-floor exterior prominently features exposed concrete and stone veneer, highlighting a functional, modern aesthetic that complements the surrounding structures. The upper stories mainly use fiber cement siding in alternating horizontal and vertical banding, providing visual interest and helping break up the structure’s massing. Glass is also a key feature, incorporated through the numerous windows and balconies. Stucco is used as a border between the ground and upper floors, and as a canvas for the planned mural that will occupy the south-facing façade and proposed ground floor signage, covering well under 50% of the street-facing building walls and thus in compliance with EMC §155.312.030.C (Stucco). The facades meet the requirements for exterior materials specified in EMC §155.312.030, and for these reasons are consistent with Design Review Criteria 5.

Figure 7: Proposed Materials Legend



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 community of seniors, visitors, and staff will add “more eyes on the street” in the neighborhood, increasing safety and decreasing opportunities for crime. The building entry points will have tenant access control, and security cameras will be placed strategically on public spaces around the building and within the City’s garage. The first-floor garage, reserved for City use and ADA van parking, will be screened with openings for controlled access at two sides. While the building has no ground floor outdoor space, the second-floor terrace provides tenants with a

place for gardening, social gatherings, and outdoor activities, all of which foster a sense of responsibility and ownership for the space. For these reasons, the Project promotes public safety and incorporates numerous features to minimize opportunities for crime, consistent with Design Review Criteria 6.

- 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.F (Invasive Plants).**

The Applicant has submitted a preliminary landscape plan, showing three landscaped beds totaling 302-sf on the ground-level perimeter of the building and an additional 550-sf of landscaping in planters on the second-floor terrace. The plan indicates the overall planting palette will be determined by the Wiyot Tribe's biologist and supplied by the Wiyot tribal native plant nursery, and will prioritize species native to Eureka, as defined by the California Native Plant Society, meeting or exceeding the City's 75% native plant requirement in EMC §155.328.050.D. The Applicant has specified that the ground-floor plantings will be chosen for low-water usage and to texturally soften the building's edges, while the planting on the terrace will be focusing on plants culturally significant to the Wiyot. The Applicant has not yet submitted all of the required content of a landscape plan pursuant to EMC §155.328.030 (Landscape Plans), including specifications on plant species, number, and size; details on landscape maintenance; or information necessary to demonstrate compliance with the California Model Water Efficient Landscaping Ordinance (California Government Code §65591). A condition has therefore been added to require this information as part of the future Building Permit application. As conditioned, the Project will comply with all City landscaping standards. For these reasons, the Project incorporates appropriate, low-water-use, and native landscaping that avoids invasive species and supports long-term sustainability, consistent with Design Review Criteria 7.

Based on the analysis above, the Project 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).

ENVIRONMENTAL ASSESSMENT

On July 18, 2023, with the adoption of Resolution No. 2023-39, the Eureka City Council determined the Project is categorically exempt from the requirements of the California Environmental Quality Act (CEQA) pursuant to Public Resources Code (PRC) §§21159.21 and 21159.23 and CEQA Guidelines §§15192 and 15194. The project meets the eligibility criteria for the Affordable Housing Exemption under CEQA Guidelines §15194, and the threshold criteria for affordable housing projects set forth in CEQA Guidelines §15192. On July 19, 2023, the City filed a Notice of Exemption (NOE) with the Humboldt County Recorder's Office and the State Clearinghouse (SCH No. 2023070391). A copy of the NOE is included in Attachment 4.

Since the NOE was filed, the Project has been refined; however, the refinements do not change the Project's eligibility under the Affordable Housing Exemption. The Project continues to meet all eligibility and threshold criteria. Therefore, the prior CEQA determination remains valid and no additional environmental review is required.

PUBLIC HEARING NOTICE

Public notification consisted of notification by mail of property owners within a 300-foot radius of the site on or before September 12, 2025. 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 September 12, 2025.

DOCUMENTS ATTACHED

Attachment 1: Resolution 2025-____

Attachment 2: Applicant Submitted Material

Attachment 3: Referral Comments

Attachment 4: Filed CEQA Notice of Exemption and associated City Council Resolution