

<b>Title:</b>	Startare Residential Rehabilitation and Façade Alterations
<b>Project:</b>	Historic Preservation HP-25-11
<b>Location:</b>	1627 Pine Street
<b>APN:</b>	004-071-015
<b>Applicant:</b>	William Startare
<b>Property Owner:</b>	William Startare and Erik Strombeck
<b>Purpose:</b>	After-the-fact approval of exterior façade alterations to rehabilitate a multi-family residence, including changes to siding, trim, doors, windows, porches, and lighting.
<b>Complete Application:</b>	February 11, 2026
<b>Deadline for Action:</b>	May 12, 2026
<b>General Plan:</b>	HDR – High Density Residential
<b>Zoning:</b>	R3 – Residential High
<b>California Environmental Quality Act (CEQA):</b>	If approved (or conditionally approved), then exempt under CEQA Guidelines §15331, Class 31 Historical Resource Restoration/Rehabilitation; if denied, then CEQA does not apply per CEQA Guidelines §15270.
<b>Staff Contact:</b>	Chris Lohofener, Senior Planner
<b>Recommendation:</b>	<ol style="list-style-type: none"> <li>1. Hold a public hearing;</li> <li>2. Make findings on the record regarding consistency with the Secretary of the Interior’s Standards for the Treatment of Historic Properties</li> <li>3. Approve, approve with conditions, or deny the application; and</li> <li>4. Direct staff to return with a resolution with written findings for approval, conditional approval, or denial at a subsequent meeting, consistent with the Historic Preservation Commission’s action and oral findings.</li> </ol>
<b>Motion:</b>	“I move the Historic Preservation Commission find the project exempt from CEQA and conditionally approve [or deny] the application based on the Commission’s verbal findings on the record and direct staff to return with written findings and a resolution for adoption at a subsequent meeting.”

Figure 1: Location Map



Figure 2: Vicinity Map



## **PROJECT DESCRIPTION**

The Applicant, William Startare, is requesting after-the-fact approval of exterior alterations to a residential structure, including removal and/or replacement of windows and trim, doors and trim, door hardware, siding, decks/porch, light fixtures, and HVAC/plumbing components.

The property is listed on the Local Register of Historic Places (LRHP). Under Eureka Municipal Code (EMC) §157.003.A.1, alterations to a designated historic resource must be reviewed by the Historic Preservation Commission (HPC).

**Figure 3. Site Map** (Property outlined in yellow; dashed yellow line indicates removed porch)



## **BACKGROUND**

### **Site and Historic Context**

The 6,534-square-foot parcel contains a 2,059-square-foot multi-family residence (Figure 3). The Eureka Heritage Society’s “Green Book” (Eureka: an Architectural Review) dates the building to about 1900 and describes it as a “two-story frame Eastlake house with pedimented two-story square bay; asbestos siding added.” Eastlake architecture (often referred to as West Coast Stick houses in Northern California and the Pacific Northwest) was common in the late nineteenth and early twentieth centuries, and is characterized by vertically oriented massing and decorative wood detailing. The projecting two-story square bay with triangular pediment is a key element of the building’s vertical form and architectural expression (Figure 4). The asbestos siding reflects a later, mid-twentieth-century change to the exterior cladding, but it is unclear from the Green Book how much original siding remained. The Sanborn Map<sup>1</sup> from 1900 confirms the original residence location and footprint on the parcel (Attachment 2).

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<sup>1</sup> Sanborn maps are highly detailed, large-scale historic maps of U.S. cities and towns created between 1867 and the late 20th century, primarily for fire insurance assessment. They document building materials, uses, and street layouts, and are widely used in urban history and historic preservation research ([Wikipedia, “Sanborn maps.”](https://en.wikipedia.org/wiki/Sanborn_maps) accessed 4/14/2026).

Records from the Humboldt County Assessor's Office indicate that the residence was converted to a two-unit residence in the 1960s.

### Prior Approvals and Code Enforcement History

Staff conducted site visits and reviewed historic documentation and photographs, including City permit records and abatement files. The earliest available images, from 2011, show the residence before the Applicant's alterations (Figure 4). In 2010, a former owner obtained after-the-fact HPC approval for a covered rear porch (HPO-10-0001), which was constructed under Building Permit B09-0914. In 2011, the same owner received HPC approval to reconstruct the front porch with conditions requiring turned stair balusters, staircase skirting to match the skirting on the house, and paint consistent with the residence (HPO-11-0005). The front porch was constructed under Building Permit B-11-039. The property has also been the subject of 14 code enforcement and abatement cases between 2007 and 2025, including two cases associated with the current owner for construction without the benefit of permits. Both cases (CE-25-12 and CE-25-498), further discussed below, remain open and will require after-the-fact Building Department review and relevant permitting.

Figure 4: Pine Street Façade, West Elevation, 2011.



### Existing Conditions at Time of Purchase

According to the Applicant, the residence was purchased at a foreclosure auction on December 3, 2024, when the building was boarded, the rear porch had collapsed, and the roof and exterior elements were in poor condition. Applicant photographs, City images, and a prior real estate

Figure 5: Prior Conditions, 2024.



listing generally support this description, showing substantial deferred maintenance, including a failed rear porch, broken and boarded openings, and deteriorated siding (Figure 5).

### **Recent Permit History, Current Use and Future Intent**

Following Code Enforcement case CE-25-12 for construction without permits, the current owner obtained an over-the-counter building permit (B-25-28) to re-roof the residence, replace a total 200 square feet of siding, and repair existing windows. Because the roofing and siding work was described as like-for-like, and window repair was limited to glass replacement only, the project was not initially sent to the HPC. The work that occurred on site, however, went beyond the permitted scope of work, and included removal and reconstruction of rear porch elements, installation of roughly 600 square feet of new Hardie-brand siding in multiple areas, replacement of window and door assemblies, reconfiguration of exterior openings at the rear (east) and side (south) elevations, and new decking and lighting. Due to the excess scope of work, Code Enforcement case CE-25-498 was opened for unpermitted building alterations.

While the structure has functioned as a two-unit residence since the 1960s, recent interior alterations have changed the layout configuration. Based on discussions with the Applicant, Units A and B are currently occupied, and the Applicant is planning to add a third unit (Unit C) within the existing structure but has stopped work pending permit approval. Exterior door labeling (Units A, B, and C) and certain entry configurations observed on site are consistent with this three-unit arrangement. The Applicant has stated that no additional exterior modifications are currently proposed to accommodate the third unit.

In August 2025, the Applicant applied to subdivide the property (SDMN-25-2) into three “small-lot” parcels (i.e., a small lot subdivision); however, processing of the subdivision has been placed on hold pending review and resolution of the unpermitted exterior alterations by the HPC. Subdivision is not subject to HPC review; however, any future development on the resulting parcels will remain subject to EMC Chapter 157 unless the resulting parcels are removed from the LRHP. The Applicant has indicated that removal from the LRHP is not proposed at this time.

### **Purpose of Current Review and Scope of Work**

Because work exceeded the approved permit scope of BP-25-28, additional permits are needed to address historic preservation criteria and building code compliance related to the exterior and interior improvements. The HPC is being asked to conduct an after-the-fact review of the exterior alterations. Historic review is occurring first so that any corrective work or conditions identified by the HPC can be included in a subsequent building permit application.

Given the range of alterations on each façade (all four facades are visible from the streetscape [i.e. a public street or alley]), the subsections that follow are organized by façade. Each section summarizes previously documented conditions and existing conditions, followed by a numbered, item-by-item description of changes corresponding to the photographic record.

### **Pine Street Façade, West Elevation (Figures 6 - 8)**

Prior documentation from the Green Book, archived records, Google StreetView, and real estate listing materials show the Pine Street façade as the building’s primary frontage, with the two-story pedimented bay, front porch, and entry sequence serving as key elements of its Eastlake character. The elevation featured a traditional main doorway, wood window assemblies with trim and

projecting sills, decorative wood detailing, square bay with triangular pediment, and porch details that defined the building's primary frontage (Figure 6).

**Figure 6: Pine Street Façade, 2024.**



**Figure 7: Pine Street Façade, Post-Rehabilitation, 2025.**



In its current condition, the Pine Street façade appears to retain its overall massing, bay configuration, original siding, windows and projecting sills, and original porch location, while incorporating targeted changes at the main entry. These include new door hardware and a replacement light fixture at the front door, along with an existing reconstructed porch approved under a prior Historic Preservation Permit (HP-11-0005), where some porch elements differ from the that approval but predate the current ownership (Figure 7).

1. New door hardware was installed at the main entry, replacing a traditional brass knob and deadbolt with a traditional black knob and deadbolt, as described by the Applicant (Figure 7).
2. The Applicant reports that no recent work was done on the front porch and that its repair occurred before the current ownership. City records show the porch was repaired under Historic Preservation Permit HPO-11-0005 (2011), with conditions requiring: (1) turned stair balusters, (2) staircase skirting matching the house, and (3) paint consistent with the residence. Field observations indicate the skirting and paint are consistent with those conditions, but the balusters are 2x2 dimensional lumber rather than turned balusters (Figure 7). Because this condition predates the current owner, it is treated as an existing condition.

3. A new white motion-activated light fixture was installed above the doorway (Figures 7 and 8). The timing of replacement for the previous fixture is unknown.

**Figure 8: Replacement Light**



**Church Street Façade, South Elevation (Figures 9 - 12)**

Prior documentation and listing materials show the south elevation with a mix of asbestos and wood lap siding, wood windows, a door opening, and a large window on the projection in the back corner that read as a prominent feature of the elevation and alcove (Figure 9, 2012 photo). These openings and associated trim features, siding patterns, and decorative features were in place prior to rehabilitation efforts (Figure 9).

**Figure 9: Church Street Façade, Prior Conditions, 2025 and 2012.**



In its current condition, the front portion of the structure retains many original wooden window assemblies and projecting sills, and also includes new heater and kitchen-related vents. The siding appears to be asbestos. On the rear portion, a new exterior light was installed above the alcove doorway, and Hardie lap siding installed in place of wood lap siding. Several prior window and door assemblies have been removed, modified, or infilled, including conversion of a former window to a doorway with a small deck, replacement of a wood sash window with a vinyl unit and simplified trim, and enclosure of other historic or earlier openings with new siding.

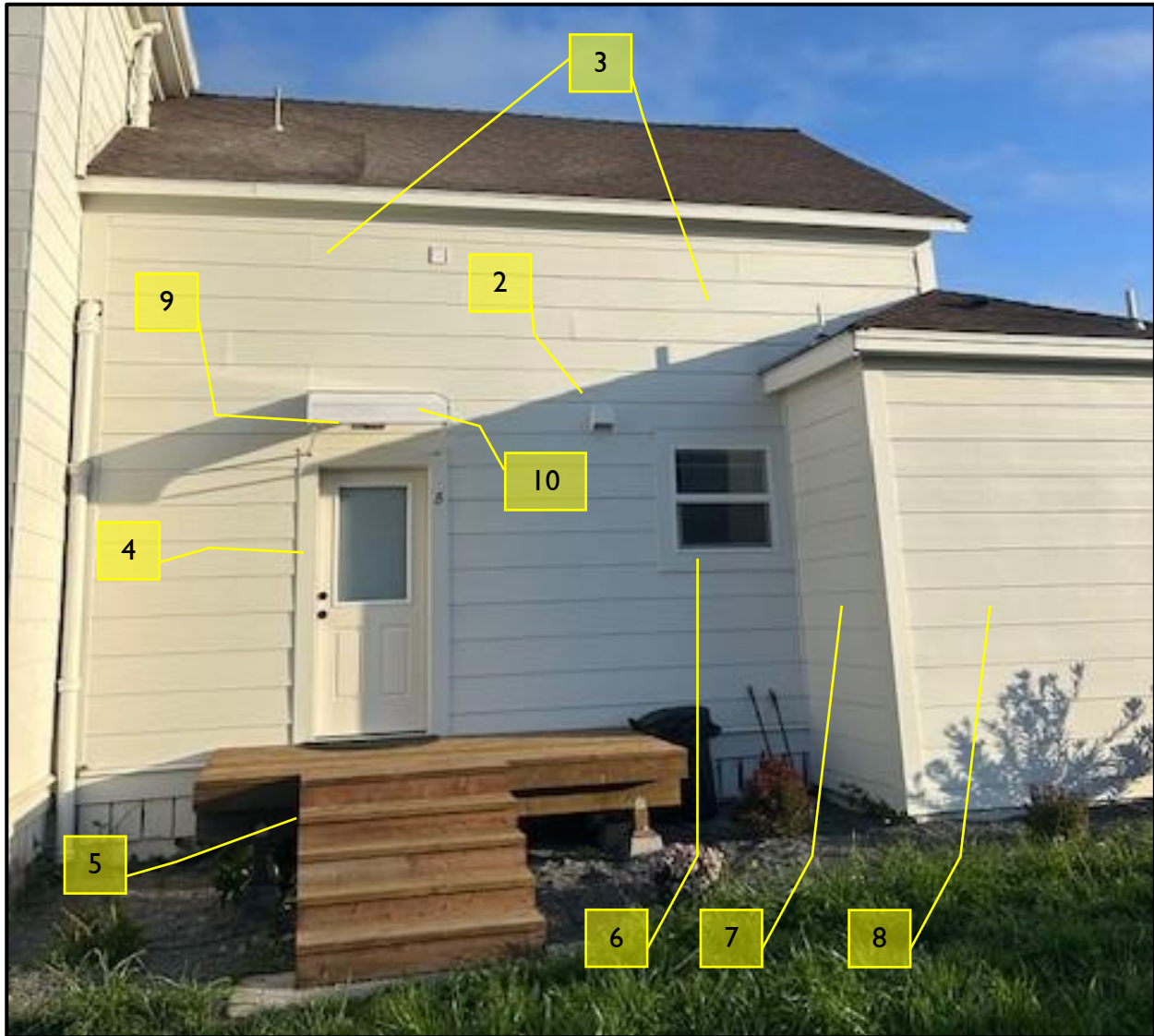
**Figure 10: Church Street Façade, Post-Rehabilitation, 2025.**



Below is a numbered, item-by-item description of these changes, keyed to the post-rehabilitation photographs in Figures 10, 11, and 12.

1. A new heater outlet vent has been installed. (Figure 10).
2. A new vent has been installed, presumed to serve kitchen appliances added as part of the interior remodel (Figure 11).

**Figure 11: Church Street Façade, Alcove, Post-Rehabilitation, 2025.**



3. Hardie lap siding has been installed throughout the alcove in place of the previous wood lap siding (Figure 11).
4. Based on the 2024 real estate listing floor plans and archived photos, a double-hung wood window assembly, consistent with other windows on the residence, previously occupied this alcove wall area. That window assembly has been removed and replaced with a new doorway, including new half-light fiberglass door with round black doorknob, 1x4 trim, and aluminum threshold (Figures 9 and 11, also see Attachment 2 for floor plans and interior photos depicting room layout).
5. A new pressure-treated wood deck on pier blocks has been constructed beneath the new doorway. The Applicant reports that an older landing was replaced in this location, however, available photos show a window opening and a large shrub rather than a prior landing (Figures 9 and 11).
6. The original window opening appears to remain, but the historic wood sash window has been replaced with a modern vinyl unit. The original wood casing and projecting sill have been removed and replaced with flat 1x4 trim (Figure 11).

7. According to the 2024 real estate listing floor plans, a 30-inch doorway previously existed at this location, likely with associated trim details. The Applicant reports that the door had been removed and the opening boarded prior to his ownership. This doorway has now been removed and infilled with Hardie lap siding (Figures 9 and 11).
8. A window opening approximately 6 feet by 5 feet, with projecting trim, previously occupied most of this wall. It is unclear whether this window was original to the building. The Applicant reports that the window had been “smashed out” and boarded prior to his ownership, and the opening has since been removed and covered with Hardie lap siding (Figures 9 and 11).
9. A new light fixture has been installed above the new doorway in the alcove. (Figures 11 and 12). It is unclear whether the fixture complies with the City’s Dark Sky regulations; if not, it must be brought into compliance.
10. The awning was installed as part of the rehabilitation but has since been removed. The Applicant stated that he intends to develop a different design to protect the entryway – any new exterior alteration will be conditioned for HPC approval.

**Figure 12. New Light Fixture.**



#### **Alley Façade, East Elevation (Figures 13 and 14)**

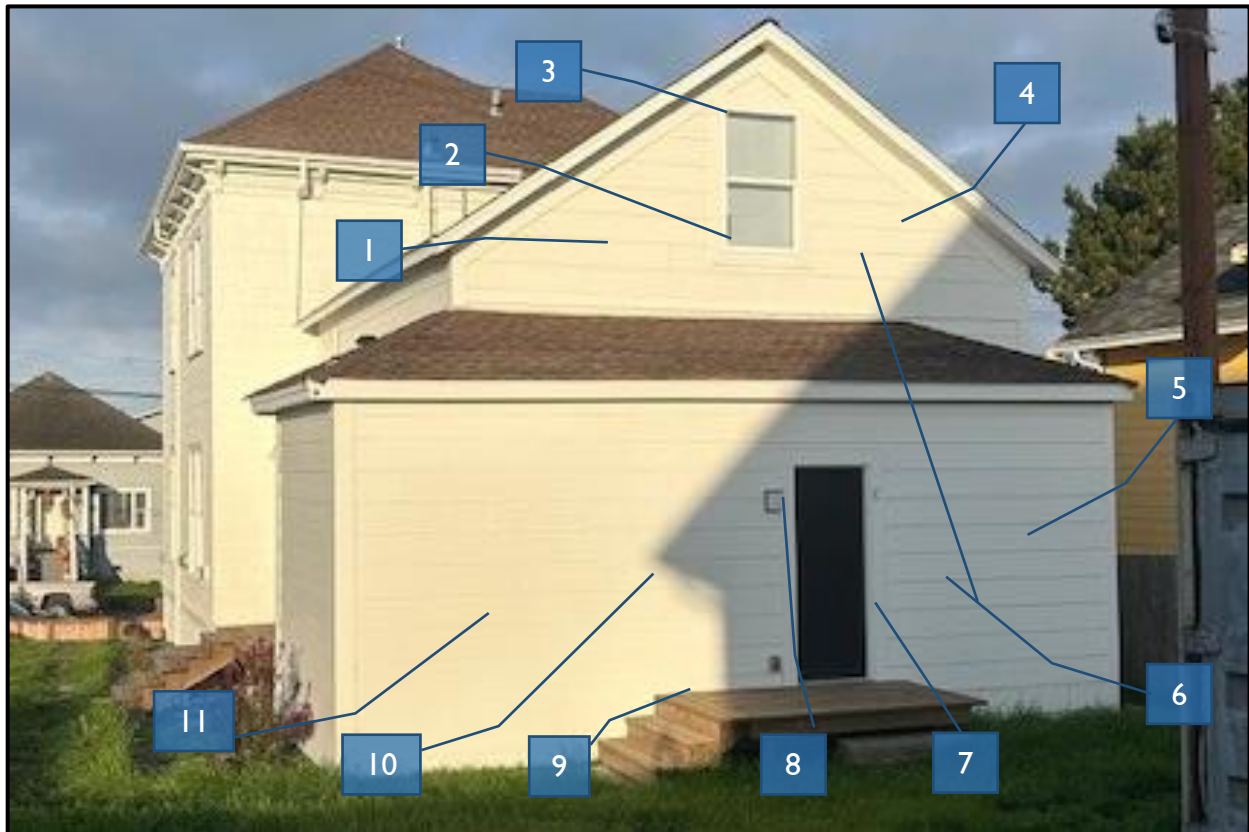
Prior documentation from 2024 and 2025, and real estate listing materials, show a second-story door opening with a small balcony/landing and simple wood guardrail at the center gable, multiple wood window openings with trim on both levels, and narrow wood lap siding, much of it covered with plywood boarding (Figure 13). As mentioned earlier, a ground-level porch/landing structure that was constructed under Building Permit B09-0914, was in poor condition and ultimately demolished in 2025.

**Figure 13: Alley Façade, Prior Conditions, 2012 and 2025.**



In the present condition, the overall massing and roof forms remain the same, but individual openings and materials have been reorganized (Figure 14). The former second-story balcony, door, and windows have been removed and replaced by a single window at the center of the gable, with simplified 1x4 flat trim. On the lower level, prior window and door locations have been consolidated into a solid rear door and a reduced number of windows, with some earlier openings infilled. The elevation is now clad in new lap siding and trim, and the rear porch has been replaced by a small wood landing and steps serving the rear door. Below is a numbered, item-by-item description of these changes, keyed to the annotated post-rehabilitation photograph in Figure 14.

**Figure 14: Alley Façade, Post-Rehabilitation, 2025.**



1. It is unclear if the original window had been replaced prior to the current owner, but the window opening, wood casing, and projecting sill have been removed and infilled with Hardie lap siding.
2. It is unclear if the door and balcony feature were original or historic components of the home. However, the door and wood casing were removed, as well as the small balcony and railing.
3. A modern vinyl window unit and flat 1x4 trim, as well as Hardie lap siding, were installed in place of the removed door and balcony described above.
4. It is unclear if the original window had been replaced prior to the current owner, but the window opening, wood casing, and projecting sill have been removed and infilled with Hardie lap siding.
5. The original double-hung wood sash window unit, wood casing and projecting sill have been removed and infilled with Hardie lap siding.

6. Hardie lap siding and new corner trim has been installed throughout the rear façade in place of the previous wood lap siding.
7. The door opening appears to remain in place, but the door and wood casing have been removed. In its place is a modern wood slab door with flat 1x4 trim and a black round doorknob.
8. A new light fixture has been installed above the new doorway in the alcove. (Figures 12 and 14).
9. The deteriorated landing and overhang were removed and a new pressure-treated wood deck on pier blocks has been constructed beneath the new doorway.
10. It is unclear if the original window had been replaced prior to the current owner, but the window opening, wood casing, and projecting sill have been removed and infilled with Hardie lap siding.
11. It is unclear if the original window had been replaced prior to the current owner, but the window opening, wood casing, and projecting sill have been removed and infilled with Hardie lap siding.

#### Interior Lot Line Façade, North Elevation (Figures 15 and 16)

Prior evidence shows that the original window assemblies and decorative features seem to remain intact (Figure 15). The north façade has been altered primarily to address building maintenance and utility needs. Work on this side of the structure has focused on replacement of deteriorated exterior cladding with new Hardie lap siding, and installation of new plumbing components to serve interior mechanical systems (Figure 16).

1. New plumbing was installed to accommodate a new water heater.
2. Hardie lap siding and new corner trim has been installed throughout the interior lot line façade in place of the previous wood lap siding.

**Figure 15: Interior Lot Line Façade, Prior Conditions, 2024.**



**Figure 16: Interior Lot Line Façade, Post-Rehabilitation, 2025. View from Street (upper) and View from Alley (lower).**



In summary of the building modifications, the Pine Street elevation (west) retains its existing massing, bay configuration, and porch location, with recent work limited to new door hardware and a replacement light fixture at the main entry. On the Church Street (south) elevation, the front portion retains existing window assemblies and asbestos siding, while the rear portion

includes new Hardie lap siding, a new door and small deck in place of a prior window, a new vinyl window, infill of former door and window openings, and new vents and lighting. On the alley (east) elevation, the overall massing and roof forms remain, but multiple prior window and door openings, balcony elements, and associated trim have been removed, consolidated, or infilled, and the façade has been re-clad with new lap siding, a new rear door, and a small landing and steps. On the remaining elevation (north), the front portion retains window openings and siding, while the rear portion includes new Hardie lap siding and plumbing additions.

## **HISTORIC PRESERVATION ANALYSIS**

EMC §157.006(C), specifies that for properties listed on the LRHP, any proposed replacement or alteration must be evaluated based on its effect on the existing historical character of the affected structure as it relates to the streetscape. Also, as provided in Chapter 157, the HPC has adopted the **Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards)** to guide alterations to historic properties and support the HPC's historic preservation responsibilities.

The Standards identify four treatment approaches for historic properties: Preservation, Rehabilitation, Restoration, and Reconstruction. For this project, **Rehabilitation** is the most appropriate standard. Rehabilitation recognizes the need to alter or add to a historic property to accommodate continuing or changing uses while retaining the property's historic character as it has evolved over time. Staff has selected this standard because the proposed project involves alterations to a historic structure to rehabilitate it into a livable space while aiming to preserve its original historic character and use.

Rehabilitation is defined as the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features that convey its historical, cultural, or architectural significance when possible. There are ten Standards to consider when determining if Rehabilitation is the appropriate method of preserving a historic resource:

- 1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.**

Consistent. The subject property has historically been used for residential purposes and has functioned as a two-unit multi-family residence since 1961. The property is located within a multi-family zoning district (established with the City's original interim land use map in 1942) and continues to function in a residential capacity. Therefore, the use is consistent with Standard 1.

- 2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.**

HPC direction needed. The front portion of the structure retains key aspects of its historic character, including its overall massing, vertical orientation, prominent two-story front bay, original wood windows, and decorative features along the rooflines and porch. However, exterior alterations on the rear portion have modified or removed certain materials and features, including windows, siding, porch elements, and exterior openings across multiple façades. Based on available documentation, it is not always clear which features had been previously altered versus those modified as part of the recent work. In addition, some replacement elements differ in design and detailing from those documented in earlier photographs and prior approvals.

The HPC should determine whether the changes retain and preserve the historic character by avoiding removal of distinctive materials and defining features, spaces, and spatial relationships.

- 3. Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.**

Consistent. The project does not introduce conjectural features or elements from other historic properties; therefore, the project is consistent with Standard 3.

- 4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.**

HPC direction needed. The age and historical significance of some features, such as the removed second-story balcony/porch, door, and window assemblies on the rear portion of the residence, are unknown.

The HPC should determine whether any changes to the property that may have acquired historical significance are retained and preserved.

- 5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.**

HPC direction needed. Though some alterations have occurred, the front portion of the structure appears to retain much of the distinctive features that characterize the property. The rear portion has received more substantive alterations. The extent to which the alterations preserve the craftsmanship of the property is not fully clear.

The HPC should determine whether the distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize the property have been adequately preserved.

- 6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.**

HPC direction needed. The project includes replacement of certain exterior historic features where deterioration was present. It is not fully clear whether repair was feasible in all

instances or whether replacement was necessary due to the condition of the materials. In addition, it is not clear whether distinctive features that were replaced adequately match the old to the extent feasible.

The HPC should determine whether replacement of historic features was necessary, or whether they could have been repaired, and whether the new features appropriately match the original in design, color, texture, and, where possible, materials.

**7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.**

Consistent, based on available information. While there is evidence of replacement of historic materials with new materials (i.e., replacing wood window units with modern vinyl, or replacing wood lap siding with Hardi-brand lap siding), rather than treatment of existing historic materials, there is no evidence of harmful treatment to remaining historic materials (i.e., sandblast or use of harsh chemicals that damage old surfaces).

**8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.**

Consistent. The project involved minimal ground disturbance, with the primary impacts related to installation of pier blocks for the two new porches on the south side and rear of the building, and vegetation removal throughout the property. Therefore, the project is consistent with Standard 8.

**9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.**

HPC direction needed. The project includes alterations to exterior materials, architectural detailing, and building openings on multiple façades. Some new elements differ from the historic materials and detailing documented in earlier photographs and prior approvals, including variations in window configurations, siding treatment, and porch elements. The extent to which the new work is compatible with the historic character of the structure and whether it appropriately differentiates from original features is not fully clear based on the available record.

The HPC should determine whether the new work is differentiated from the old yet compatible with the historic materials, features, size, scale and proportion, and massing, and protects the overall integrity of the historic property and its environment.

**10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.**

Not applicable. While exterior alterations have occurred, no substantial additions or new structures are proposed. Therefore, this Standard is not applicable.

## **CONCLUSION AND STAFF RECOMMENDATION**

The rehabilitation of 1627 Pine Street presents a complex preservation case involving after-the-fact alterations. While the structure retains its overall massing, form, and key architectural features, the project includes a range of modifications to siding, windows, doors, and porch elements across multiple façades. As discussed in the analysis above, staff is able to make findings of consistency for Standards 1, 3, 7 and 8, while Standards 2, 4, 5, 6, and 9 require HPC interpretation due to the extent of alterations.

Staff recommends that the HPC consider the project and make the required findings verbally on the record for consistency with the Secretary of the Interior's Standard for Rehabilitation, and take action to approve, approve with conditions, or deny the application. Following the HPC's action and direction, staff will return with a resolution that includes written findings, consistent with the HPC's verbal findings, for adoption at a subsequent meeting.

## **ENVIRONMENTAL ASSESSMENT**

This project is subject to environmental review in accordance with the California Environmental Quality Act (CEQA). A project that complies with the Secretary of the Interior's Standards for the Treatment of Historic Properties may qualify for a Class 31 (Historical Resource Restoration/Rehabilitation) categorical exemption pursuant to CEQA Guidelines §15331.

CEQA Guidelines §15300.2(f) (Exceptions, Historical Resources) states that a categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource. Under CEQA Guidelines §15064.5(b)(1), a significant impact may occur if a project causes a substantial adverse change in the significance of a historical resource through demolition or alteration such that its significance is materially impaired. Material impairment may result where character-defining features or those qualities that justify a resource's historic designation are substantially altered.

In this case, the applicability of the Class 31 exemption depends on whether the HPC finds the project consistent with the Secretary of the Interior's Standards. If the HPC finds the project, or the project with conditions, consistent with the Secretary of the Interior's Standards, the project qualifies for a Class 31 categorical exemption pursuant to CEQA Guidelines §15331. If the HPC denies the application, CEQA does not apply pursuant to CEQA Guidelines §15270.

## **PUBLIC HEARING NOTICE**

Public notification consisted of notification by mail of property owners within a 300-foot radius of the site on or before April 24, 2026. In addition, the notice was posted on the City's website and bulletin boards. A public hearing notice sign was posted on the site on or before April 24, 2026.

## **DOCUMENTS ATTACHED**

Attachment 1: Applicant Submitted Materials

Attachment 2: Supporting Background Materials

Attachment 3: Draft Resolution (for reference; subject to revision)

<p>This document was prepared by City staff with the assistance of generative AI tools for drafting and editing support. All analysis, conclusions, and determinations were reviewed and finalized by City staff.</p>
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