

Supporting Information for CEQA Statutory Exemption 15183

Housing Authority of the City of Eureka – C & Clark Project

Design Review Application DR-24-0003

Prepared by:

SHN

812 W Wabash Ave
Eureka, California 95501
(707) 441-8855

July, 2024

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1. Project Site Plan
2. Shadow Analysis Diagram
3. CalEEMod Emissions Modeling Results
4. Cultural Resources and Architectural History Inventory Report
5. Phase I Environmental Site Assessment Report
6. Noise Review Letter
7. Trip Generation and VMT Screening Report

Please use the link below to access Attachments:

<https://transfer.eurekaca.gov:5252/sharing/xHmhXn3IK>

Project Information

1. **Project Title:** Housing Authority of the City of Eureka – C and Clark Project
2. **Lead Agency Name and Address:**

CITY OF EUREKA
531 K Street
Eureka, CA 95501
3. **Contact Person and Contact Information:**

Cristin Kenyon, AICP
Development Services Director
ckenyon@eurekaca.gov
(707) 441-4165
4. **Project Location:** The project site is located within the City of Eureka (City) at 1115 C Street (APN 004-163-001) on the corner of C and Clark Streets. The site is 29,862-square feet or 0.68-acres (see **Figure 1** and **Figure 2**).
5. **Applicant's/Owner's Name and Address:**

Housing Authority of the City of Eureka (HACE)
735 W Everding Street
Eureka, CA 95503
6. **General Plan Designation:** High Density Residential (HDR)
7. **Zoning:** Residential High (R3)
8. **Description of Project:** The Housing Authority of the City of Eureka (HACE) and Brinshore Development, L.L.C. are partnering to reposition and redevelop HACE's public housing portfolio on a site that contains six (6) one- and two-story buildings with 12 affordable housing units (see **Figure 2**). HACE has determined that the public-housing buildings on this property is functionally obsolete and is pursuing a repositioning strategy pursuant to Section 18 of the United States Housing Act of 1937 (42 USC 1437p).

The project proposes to demolish the existing housing and rebuild senior-restricted multi-family housing on the site at a higher density using current City zoning code density allowances and State Density Bonus law. Current residents that would be displaced by the project would be offered the opportunity to relocate into other housing owned by HACE or would receive tenant protection vouchers to find housing elsewhere in the community. As noted above, the project site is zoned R3, which allows a density of 44 units per acre, or 30 units at the site. The project proposes 44 units, which would require a 47 percent density bonus. Of the 44 units, the project proposes 43 income-restricted units (80 percent lower income and 20 percent moderate income) and one market rate manager's unit, which would entitle the project to an 80 percent density bonus, or

54 units at the site. Nonetheless, the project only proposes 44 units. The project also proposes to use a waiver as allowed by State Density Bonus law to allow the floor area ratio in Eureka Municipal Code Section 155.204.030(D) of 1.25 to be increased to 1.30.

As outlined in **Table 1**, the project would result in 32 net new affordable units. The proposed square footage of the residential building would be 38,750 square feet and the project would increase the number of parking spaces from 8 to 11, which are accessed from the alley along the southern property line of the site. Facilities would include an onsite laundry room, manager’s office, storage spaces, and mail area. Proposed amenities would include outdoor recreation areas, an indoor community room, and mobility scooter/bicycle storage (see **Attachment 1**).

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

Table 1: C & Clark Project – Residential Units and Parking

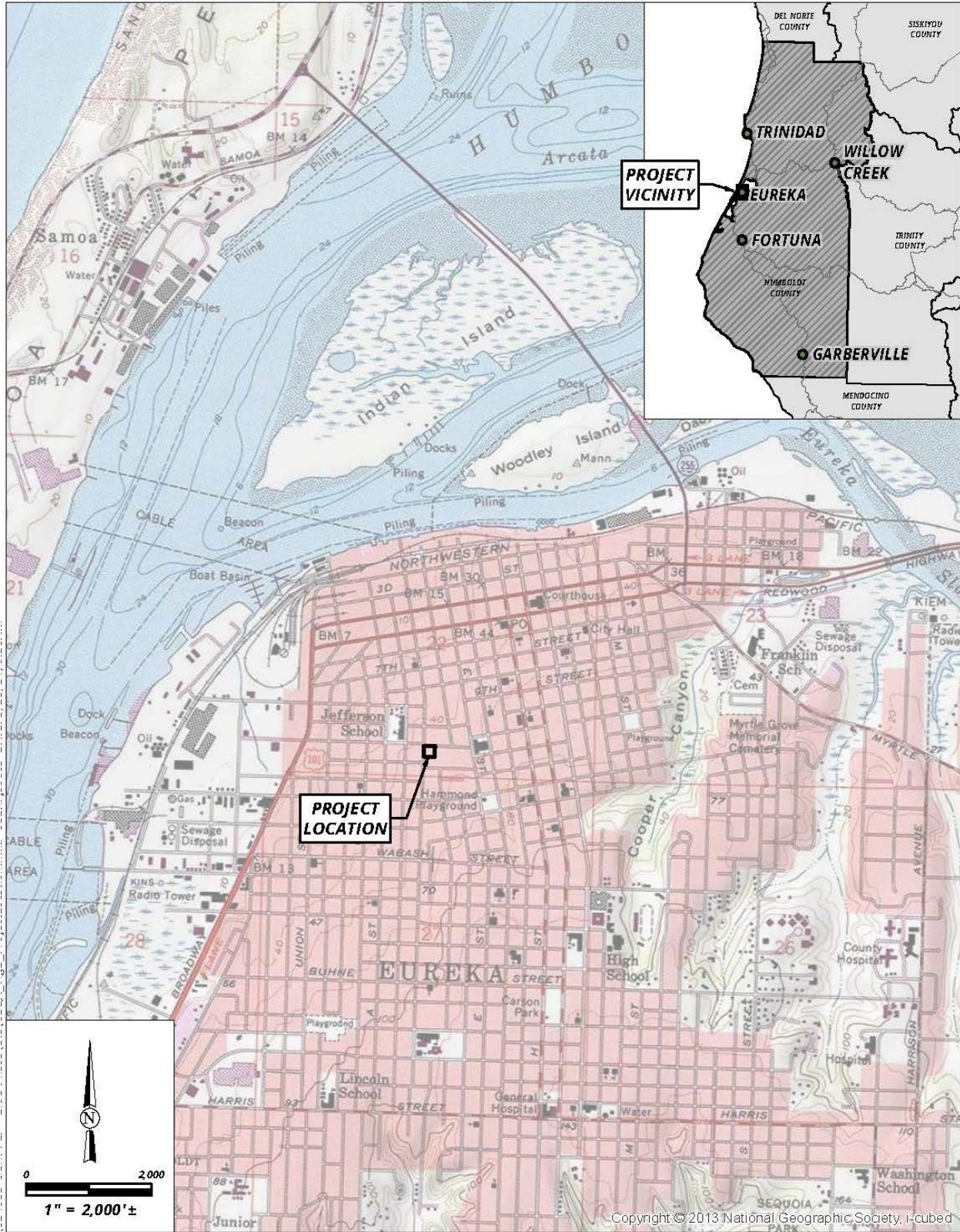
Project	Acreage	Building Area (s.f.)	Existing Units	Proposed Units	Existing Parking	Proposed Parking
C & Clark Project	0.69	38,750	12	44	8	11

Approvals required for the project from the City of Eureka include the following:

- **Design Review.**

Project construction is anticipated to begin in 2026 and be completed by 2027. Pursuant to 2040 General Plan Policy N-1.13, operation of heavy equipment will be limited to daytime hours between 7 a.m. and 7 p.m. Construction staging and parking will be mostly contained on the project site, but limited closures of surrounding sidewalk and street parking may occur. Public Works - Engineering will require an encroachment permit and an approved traffic control plan for any work conducted in the right of way to ensure any impacts of closures on surrounding land uses are minimized. Pursuant to 2040 General Plan Policy AQ-1.3, construction contractors will be required to utilize air quality best management practices (BMPs) consistent with the North Coast Unified Air Quality Management District requirements and State regulations, including adherence to standard dust control measures to reduce fugitive dust generation during excavation or earthmoving construction activities. Pursuant to the City’s stormwater provisions, an Erosion and Sediment Control Plan will be prepared and adhered to during project construction, ensuring adequate BMPs will be installed and maintained to prevent water quality impacts. Pursuant to Section 106 of the National Historic Preservation Act, the City requested consultation in letters dated April 22, 2024 with the Tribes that have a current or ancestral interest in the project area. The Tribes comments included a request for implementation of an inadvertent discovery protocol during project construction.

9. **Surrounding Land Uses and Setting:** The proposed project is located on a site that is currently developed with 12 affordable housing units in six (6) one- and two-story residential buildings, which are owned and operated by the HACE and are currently in need of rehabilitation and/or redevelopment, in addition to off-street parking accessed from the alley and landscaping (see **Figure 1** and **Figure 2**). The project site is relatively flat but elevated above the sidewalk by several feet. Land uses surrounding the project site primarily consist of single and multi-family residential uses.



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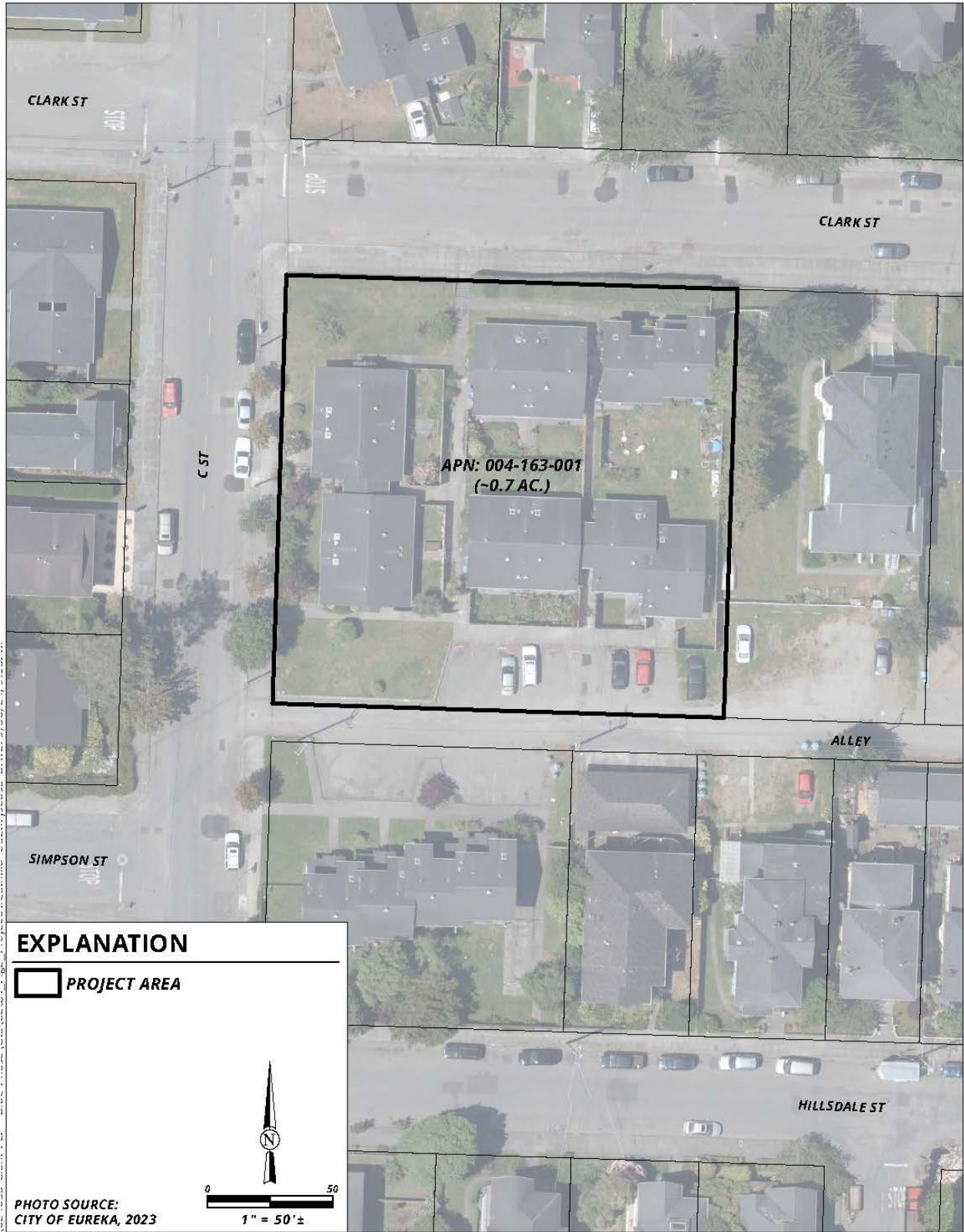
City of Eureka Housing Authority
 C Street Project
 Eureka, California

Project Location

Figure

May 2024 - 024053

1



City of Eureka Housing Authority
C Street Project
Eureka, California

Project Area
May 2024 - 024053

Figure
2

Figure 3 – Project Site Photos



Photo 1: View of Project Site at corner of C and Clark Streets, view towards southeast



Photo 2: View of Project Site from C Street, view towards east



Photo 3: View of Project Site from Clark Street, view towards south



Photo 4: View of parking at Project Site along the alley, view towards northeast

Overview of CEQA Guidelines Statutory Exemption 15183

California Public Resources Code Section 21083.3 and California Environmental Quality Act (CEQA) Guidelines Section 15183 – “Projects Consistent with Community Plan or Zoning” provides an exemption from additional environmental review for projects that are consistent with the development density established by existing zoning, community plan or general plan policies for which an Environmental Impact Report (EIR) was certified, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. Section 15183 specifies that examination of environmental effects shall be limited to those effects that:

- (1) Are peculiar to the project or the parcel(s) on which the project would be located;
- (2) Were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent;
- (3) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action; or
- (4) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR.

Section 15183(c) further specifies that if an impact is not peculiar to the parcel or to the proposed project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, then an additional EIR need not be prepared for that project solely on the basis of that impact.

City of Eureka Planning Documents

General Plan Update

The City of Eureka 2040 General Plan Update (GPU) establishes a roadmap for the long-term physical, social, and economic future of Eureka. It provides goals, policies, and programs to direct land use and development decisions, manage resources, deliver public services, and provide infrastructure. The GPU is a comprehensive, long-range planning document that guides the City's physical growth. The GPU establishes a framework for determining whether specific land use and development proposals are in harmony with Eureka's unique objectives.

The GPU applies to all of the incorporated portions of Eureka and directs population growth and plans for infrastructure needs, development, and resource protection. The project is consistent with the GPU (adopted in 2018) which prioritizes and promotes increasing high-density housing in proximity to commercial and community services and balancing the City's Housing inventory with multi-family housing and compatible public/quasi-public uses. Pursuant to the GPU, the project site has a land use designation of High Density Residential (HDR), where residential uses are allowed, and sites are permitted to develop with a density of 44 dwelling units per gross acre.

General Plan Update Program EIR

The GPU EIR (State Clearinghouse #2016102025) was certified in conjunction with adoption of the GPU on October 15, 2018. The GPU EIR comprehensively evaluated environmental impacts that would result from Plan implementation, including information related to existing site conditions, analyses of the types and magnitude of project-level and cumulative environmental impacts, and feasible mitigation measures that could reduce or avoid environmental impacts (City of Eureka, 2018b). Pursuant to Public Resources Code Section 21159.20(b)(2), community-level environmental review includes an environmental impact report certified on a general plan. Thus, a community-level environmental review has been performed. It is noted that, with the exception of the 6th cycle Housing Element update and a few land use designation map amendments, no significant amendments have been made to the City's General Plan since the certification of the GPU EIR.

As discussed in the relevant analysis sections in this document, the GPU EIR identified significant and unavoidable impacts associated with building of General Plan land uses as follows:

- Increase in operational PM10 emissions that exceed air district standards, and for which the air basin is in non-attainment;
- Potentially significant direct and cumulative impacts by causing substantial changes in the significance of historic resources;
- Potentially significant direct and cumulative impacts by causing substantial changes in the significance of archaeological and tribal cultural resources, including human remains; and
- Unacceptable increase in vehicle miles travelled (VMT) that does not meet recommended reduction targets.

6th Cycle Housing Element Update

The Housing Element identifies the need for housing in the community as well as the City's strategy to address housing needs across a wide economic and social spectrum. The Housing Element is a mandated component of the City of Eureka 2040 General Plan and has been designed to satisfy the requirements of State law. The 6th cycle of the Housing Element update covers the planning period of August 31, 2019, through August 31, 2027, with a projection period covering December 31, 2018, through August 31, 2027. The Housing Element is designed to achieve the objectives set forth in State law.

The City has developed five specific strategies to stimulate the creation of housing. These strategies are unique in that they are explicitly based on the City's existing context and designed specifically to stimulate new housing in Eureka. The five strategies are:

1. Maximize Development Potential of the Few Remaining Vacant and Underutilized Sites
2. Accessory Dwelling Units (ADUs)
3. Internal Conversions
4. Small-lot, Conservation, and Urban Lot Split Subdivisions
5. Geographically-Dispersed Affordable Housing Through Affordable-by-design Incentives and Local Density Bonuses

The City also has local affordable housing density bonus options that go beyond the density bonuses afforded by State law. The City's local affordable housing density bonuses allow flexibility in development regulations and residential density for affordable housing built within a certain proximity of transit, schools, parks, and other similar amenities.

The City prepared an Addendum to the GPU EIR for the 6th cycle Housing Element update pursuant to the provisions of CEQA Guidelines Section 15164. The Addendum reviews the proposed Housing Element amendment and examines whether, as a result of any changes or new information, any new or worsened impacts could occur which were not identified in the certified EIR. The Addendum concludes that the 2019-2027 Housing Element update is well within the analysis contained in the adopted General Plan EIR (City of Eureka, 2022b). It is noted that the GPU EIR analyzed the impact of the creation of up to 1,886 additional housing units in the City (City of Eureka, 2018b). This is approximately double the 2019-2027 Regional Housing Needs Allocation (RHNA) of 952 units, and as such demonstrates the potential environmental impacts related to the Housing Element update are well within the analysis contained in the GPU EIR (City of Eureka, 2018b).

Repositioning Plan - Housing Authority of the City of Eureka (HACE)

Public housing authorities nationally have been working to reposition their traditional public housing units. This effort is motivated by several factors:

- Backlog of capital needs have outpaced the ability of public housing funding to keep pace;
- Operating revenue from public housing is uncertain year-to-year, and in many instances, less than other available options;
- Repositioning public housing can reduce or eliminate administrative requirements and generally ease burdens of operations; and

- Unmet need for affordable housing can be addressed by redeveloping and leveraging public housing assets to provide more housing.

Repositioning means converting properties owned and operated by public housing authorities to a Section 8 platform. This change can bring more stable and increased revenue to properties. In addition to changing the subsidy type from public housing to Section 8, repositioning can also mean recapitalizing existing properties to address physical needs or redeveloping sites to create a net increase in units. The outcome of repositioning can include the public housing authorities maintaining ownership and control of original properties.

HACE has set out to reposition its traditional public housing, most of which was built in the early 1950s and requires substantial capital investment and repair. The HACE Repositioning Plan report provides a detailed analysis of the existing condition of HACE's housing portfolio and offers a repositioning recommendation that results in more households served and improves the physical and financial soundness of the portfolio.

HACE is organized as a corporate and public body as defined by California law, to develop, own, and operate affordable housing. HACE is governed by a volunteer Board of Commissioners. Relevant to HACE's repositioning plan is the close operational arrangement with the County of Humboldt Housing Authority (CHHA) which administers a Housing Choice Voucher (Section 8) program. HACE will work closely with CHHA throughout the implementation of the repositioning plan.

Summary of Findings

The proposed project is consistent with the analysis performed for the GPU EIR. Further, the GPU EIR adequately anticipated and described the impacts of the project, identified applicable mitigation measures and performance standards, as well as policies and programs necessary to reduce project specific impacts.

A comprehensive environmental evaluation has been completed for the project as documented in the attached Section 15183 Exemption Checklist. This evaluation concludes that the project qualifies for an exemption from additional environmental review because it is consistent with the development density and use characteristics established by the City of Eureka GPU including the Housing Element, as analyzed by the City of Eureka General Plan Update EIR (State Clearinghouse #2016102025), and all required findings can be made.

In accordance with CEQA Guidelines Section 15183, the project qualifies for an exemption because the following findings can be made:

- 1. The project is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.** The project proposes the redevelopment of the 0.69-acre project site by demolishing the existing housing and rebuilding multi-family housing on the site at a higher density using State Density Bonus law. Additionally, the project would increase the off-street parking spaces from 8 to 11 and proposed amenities would include outdoor recreation areas, an indoor community space, and mobility scooter/bicycle storage.

The project site is zoned R3, which allows a density of 44 units per acre. The project proposes 44 units, which would require a 42 percent density bonus. Of the 44 units, the project proposes 43 income-restricted units (80 percent lower income and 20 percent moderate income) and one market rate manager's unit, which would entitle the project to an 80 percent density bonus, or 56 units at the site. Nonetheless, the project only proposes 44 units. The project also proposes to use waivers as allowed by State Density Bonus law for development standards including, but not limited to, a waiver from Eureka Municipal Code Section 155.204.030(D) to increase the floor area ratio from 1.25 to 1.30. The use of State Density Bonus Law for the project is consistent with the strategies of the City's 6th Cycle Housing Element Update, which encourages maximizing development potential on the few remaining vacant and underutilized sites in the City (City of Eureka, 2022b). Additionally, the project would be consistent with Housing Element Policy H-2.13, which promotes and encourages the utilization of State and local density bonus laws that provide development incentives (including increased residential density) in exchange for the creation of affordable housing (City of Eureka, 2022a). It is also noted that the GPU EIR analyzed the impacts of developing 1,886 additional housing units in the City, which is double the City's 6th cycle Regional Housing Needs Allocation (RHNA) of 952 units and would account for density increases that could occur using density bonus laws (City of Eureka, 2018b).

- 2. There are no project specific effects which are peculiar to the project or its site, and which the GPU EIR Failed to analyze as significant effects.** The project site is currently developed with existing multi-family housing similar to other properties in the surrounding area and there are no project specific effects which are peculiar to the project or its site. The project site and

surrounding area has been developed for residential uses since the late 1800s and developed with multi-family, affordable housing since the early 1960s. The project site does not contain any peculiar environmental features, and the project would not result in any peculiar effects.

In addition, as explained further in the 15183 Checklist below, all project impacts were adequately analyzed by the GPU EIR and through site-specific technical studies. The project could result in potentially significant impacts to Air Quality, Cultural Resources, Greenhouse Gas Emissions, Hydrology and Water Quality, Noise, Public Services, Transportation, and Tribal Cultural Resources. However, the project is subject to applicable GPU EIR mitigation measures, performance standards, policies, programs, and other laws and regulations that would reduce project specific impacts to a less than significant level.

- 3. There are no potentially significant off-site or cumulative impacts which the GPU EIR failed to evaluate.** The project is consistent with the density and use characteristics of the development considered by the GPU EIR, except as modified by State Density Bonus law, and would represent a small part of the growth that was forecast for build-out of the General Plan. The GPU EIR considered the incremental impacts of the project along with other planned similar projects, and as explained further in the 15183 Exemption Checklist below, no potentially significant off-site or cumulative impacts have been identified which were not previously evaluated.
- 4. There is no substantial new information which results in more severe impacts than anticipated by the GPU EIR.** As explained in the 15183 Exemption Checklist below, no new information has been identified which would result in a determination of a more severe impact than what had been anticipated by the GPU EIR.
- 5. The project will undertake feasible mitigation measures, performance standards, policies, and programs specified in the GPU EIR.** As explained in the 15183 Exemption Checklist below, the project will undertake feasible mitigation measures, performance standards, policies, and programs specified in the GPU EIR. These requirements will be implemented through project design, compliance with regulations and ordinances, and/or through project conditions of approval.

Section 15183 Checklist

Issues Not Requiring Further Analysis

Aesthetics

The GPU EIR concluded impacts to aesthetic resources would be less than significant with the implementation of GPU policies, including, but not limited to, those addressing the protection of scenic resources, requirements for design and architectural review, and measures for minimizing outdoor lighting impacts (Policies LU-1.12, LU-1.13, LU-1.14, LU-1.16, LU-1.19) (City of Eureka, 2018b).

The project proposes the redevelopment and densification of a site currently developed with affordable housing as encouraged throughout the policies and implementation programs in the GPU. As concluded in the GPU, the City of Eureka is largely built out and few developable sites remain inside the city limits; therefore, the city aims to promote full-build-out of all remaining vacant and underutilized sites in the city, across all zone districts (City of Eureka, 2018a). As discussed in the GPU EIR, the City requires design review for new development to ensure consistency with zoning standards and to review the exterior design of projects for compatibility with surrounding development. The project is subject to the City's design review process, which will allow for the review of the project for potential aesthetic impacts (City of Eureka, 2018b).

In May 2019, the City Council adopted an ordinance repealing and replacing Eureka Municipal Code (EMC) Chapter 155, the City's Inland Zoning Code, in order to bring the zoning code into alignment with the recently-adopted GPU. The current Inland Zoning Code implements the aesthetic-resource-related goals and policies of the GPU through a variety of development standards, including but not limited to standards for outdoor lighting (EMC §155.308.050), screening of waste/recyclable material storage (EMC §155.308.070), fences and walls (EMC §155.320), landscaping (EMC §155.328), signs (EMC §155.340), and parking (EMC §155.324). In addition to the design review process described above, the Inland Zoning Code also includes objective design standards for new development in residential and mixed-use zoning districts (EMC §155.312).

Regarding nighttime views, the City is already urbanized and subject to substantial amounts of existing nighttime ambient light; therefore, the GPU EIR concludes the increase in such light that will be attributable to development under the 2040 General Plan will not significantly affect nighttime views of the sky (City of Eureka, 2018b). In addition, the 2040 General Plan includes Policy LU-1.13 which requires minimization of outdoor lighting that is misdirected, excessive, or unnecessary, and requires light for development to be directed downward to minimize spill-over onto adjacent properties and reduce vertical glare (City of Eureka, 2018a). This policy is implemented by EMC §155.308.050, which requires all new exterior lighting to be directed downward, and requires light fixtures to be shielded or recessed and to meet the International Dark Sky Association's requirements for reducing waste of ambient light ("dark sky compliant") (City of Eureka, 2023).

Therefore, with the implementation of GPU policies, Zoning Code standards, and the design review process, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

Agriculture and Forestry Resources

The GPU EIR concluded impacts to agriculture and timber resources would be less than significant with the implementation of GPU policies, including, but not limited to, those addressing the requirement to protect and conserve important farmland, and the conservation of existing zoning for agriculture and timber uses (Policies AG-1.1, AG-1.7, AG-1.9, NR-3.1) (City of Eureka, 2018b).

The project proposes the redevelopment and densification of a site currently developed with affordable housing as encouraged throughout the policies and implementation programs in the GPU. As concluded in the GPU, the City of Eureka is largely built out, and few developable sites remain inside the city limits; therefore, the city aims to promote full-build-out of all remaining vacant and underutilized sites in the city, across all zone districts (City of Eureka, 2018a). Additionally, the project site has been developed with urban uses since the late 1800s, is not zoned for agricultural or timber production, and does not contain important agricultural land or timberland (City of Eureka, 2018b). Consistent with the GPU, the development would take place within an existing developed area away from agricultural and forest resources.

Therefore, based on the project location, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

Biological Resources

The GPU EIR concluded impacts to biological resources would be less than significant with the implementation of agency consultation, applicable permitting requirements, and GPU policies, including, but not limited to, those promoting the avoidance of sensitive habitat areas and provisions of buffers around such areas to maintain sensitive species habitat and those restricting development in areas of riparian habitat, sensitive natural communities, and wetlands (Policies NR-1.3, NR-2.1, NR-2.2, NR-2.4, NR-2.5, NR-2.6, NR-3.2) (City of Eureka, 2018b). The GPU EIR concluded that development in sensitive habitat areas would require consultation with state and federal regulatory agencies (e.g., National Marine Fisheries Service, US Fish and Wildlife Service, and California Department of Fish and Wildlife) (City of Eureka, 2018b).

The project proposes the redevelopment and densification of a site currently developed with affordable housing as encouraged throughout the policies and implementation programs in the GPU (City of Eureka, 2018a). As concluded in the GPU, the City of Eureka is largely built out, and few developable sites remain inside the city limits; therefore, the city aims to promote full-build-out of all remaining vacant and underutilized sites, across all zone districts (City of Eureka, 2018a). The project site does not contain and is not located adjacent to areas of sensitive habitat such as streams, gulches, wetlands, etc. (see **Figure 2** and **Figure 3**). The project site and surrounding area have been developed with residential uses since as far back as the late 1800s. As discussed in the GPU EIR, according to Figure 3.4-1 (Vegetation Types), the project site is located in a “Developed” area of the City where previously existing habitats have been reduced or replaced by development and there is a lack of habitat connectivity for wildlife movement (City of Eureka 2018b).

Therefore, the project will not cause the removal of any protected species or habitat. However, there is the potential that the project may require the removal of less than five ornamental trees along the

boundaries of the site. If any of the trees are on the City's protected tree species list (see EMC Section 155.304.140(D)(2)) and have a 24-inch diameter or circumference of 75 inches at 4.5 feet above the ground, then a tree removal permit would be required from the City per EMC Section 155.304.140.

Therefore, based on the project location, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

Energy

The GPU EIR concluded impacts to energy resources would be less than significant with the implementation of GPU policies including, but not limited to, those promoting energy conservation and energy conserving land use practices, encouraging appropriate building orientation to take advantage of passive summer cooling and winter solar access, encouraging new development to install renewable energy systems and facilities, and encouraging property owners to participate in the Community Choice Aggregation program administered by RCEA (Policies U-5.1, U-5.2, U-5.4, U-5.5, U-5.7) (City of Eureka, 2018b). As concluded in the GPU EIR, over a 20-year planning span for the General Plan, the additional energy use from residential electricity demand is not anticipated to result in wasteful or unnecessary consumption (City of Eureka, 2018b).

As required by State regulations and building code requirements, the design and construction of the residential units would be in accordance with California's Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6 of the California Code of Regulations). These requirements regulate insulation, window space and type, and other building features to maximize structural energy efficiency. These standards also require the installation of solar panels on the new buildings to offset electricity use. Compliance with these standards restricts unnecessary residential energy consumption.

The project proposes the redevelopment and densification of a site currently developed with affordable housing as encouraged throughout the policies and implementation programs in the GPU. As concluded in the GPU, the City of Eureka is largely built out, and few developable sites remain inside the city limits; therefore, the city aims to promote full-build-out of all remaining vacant and underutilized sites in the city across all zone districts (City of Eureka, 2018a). This project would be consistent with the General Plan as it would provide additional residential units on an underutilized infill site that has been used for residential purposes since the late 1800s. Future residents would be within walking distance of shopping, employment, and recreational facilities and would have access to transit and services that would reduce vehicle miles traveled and energy consumed resulting from transportation.

Therefore, with the implementation of GPU policies and state and local regulations regarding energy conservation and renewable energy, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

Geology and Soils

The GPU EIR concluded impacts related to geology and soils would be less than significant with the implementation of building codes, geotechnical and seismic design standards, and GPU policies, including, but not limited to, those addressing appropriate siting and design and the protection of paleontological

resources through inadvertent discovery protocols (Policies HS-1.1, HS-1.7) (City of Eureka, 2018b). In compliance with GPU Policy HS-1.7, the project will be conditioned to require implementation of an inadvertent discovery protocol during the proposed construction activities (City of Eureka, 2018a).

As discussed in the GPU EIR, there are no active faults within City limits as determined by CGS mapping (City of Eureka, 2018b). Additionally, the State of California provides minimum standards for building design through the California Building Code (CBC). Specific minimum seismic safety and structural design requirements are set forth in CBC Chapter 16. The CBC identifies seismic factors that must be considered in structural design. Development on the project site would be required to comply with State and local regulations related to seismic hazards (e.g., building codes and other applicable regulations such as a design-level geotechnical evaluation), which would reduce potential impacts related to geologic hazards.

Therefore, with the implementation of GPU policies and building code standards, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

Hazards and Hazardous Materials

The GPU EIR concluded impacts regarding hazards and hazardous materials would be less than significant with the implementation of federal, state, and local laws governing transportation, handling, and disposal of hazardous materials and GPU policies including, but not limited to, those addressing the safe production, use, storage, transport, and disposal of hazardous materials and hazardous waste (Goal HS-4), remediation of hazardous materials conditions to applicable regulatory standards, (Policy HS-4.4), and emergency response and evacuation planning (Policies HS-5.1, HS-5.2, HS-5.5, HS-.5.7) (City of Eureka, 2018b). Additionally, as discussed in the GPU EIR, construction activities would be required to comply with all applicable fire protection and prevention regulations specified in the California Fire Code, Hazardous Materials Transportation regulations, and Cal/OSHA regulations (City of Eureka, 2018b).

To determine if the project site potentially contains hazardous materials contamination, a Phase 1 Environmental Site Assessment was prepared for the project, which determined that the site contains no Recognized Environmental Conditions or RECs (see **Attachment 5**) (FES, 2024). Additionally, the project site is not located within 2 miles of an airport and is not located within the boundary of an Airport Influence Area and Airport Compatibility Zone (Humboldt County, 2024).

Therefore, with the implementation of federal, state, and local laws and GPU policies, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

Land Use and Planning

The GPU EIR concluded impacts to land use and planning would be less than significant with the implementation of the housing element and GPU policies including, but not limited to, those addressing the concern of physically dividing established communities (Policies LU-1.2, LU-5.3, LU-5.4, LU-6.2), and potential conflict with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect (Policies LU-6.7, LU-6.8) (City of Eureka, 2018b). In addition,

it is noted that the GPU EIR analyzed the impact of creating 1,886 additional housing units in the City, which is double the Regional Housing Needs Allocation (RHNA) of 952 units (City of Eureka, 2018b).

The project proposes the redevelopment and densification of a site currently developed with affordable housing as encouraged throughout the policies and implementation programs in the GPU. Additionally, the project is located in an established neighborhood and promotes multiple GPU policies, including Policy LU-5.3, which encourages increased development of high-density housing to balance the City's housing inventory and enhance affordability, and Policy LU-5.4, which encourages the location of high-density housing in proximity to commercial and community services, employment opportunities, major transportation corridors, and where City infrastructure can accommodate increased densities (City of Eureka, 2018b). As concluded in the GPU, the City of Eureka is largely built out and few developable sites remain inside the city limits; therefore, the city aims to promote full-build-out of all remaining vacant and underutilized sites in the city, across all zone districts (City of Eureka, 2018b).

Therefore, with the implementation of GPU policies, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

Mineral Resources

The GPU EIR concluded no impacts to mineral resources including, but not limited to, those addressing loss of availability of a known mineral resource that would be of value to the region and residents of the state, and loss or loss or availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan (City of Eureka, 2018b).

Therefore, based on the project location, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

Population and Housing

The GPU EIR concluded impacts to population and housing would be less than significant with the implementation of the Housing Element and GPU policies including, but not limited to, those addressing the concern of unplanned population growth either directly or indirectly, and substantial displacement of existing people or housing, necessitating the construction of replacement housing elsewhere (Policies LU-1.2, LU-5.3, LU-5.4, LU-6.2) (City of Eureka, 2018b).

The project proposes the redevelopment and densification of a site currently developed with affordable housing as encouraged throughout the policies and implementation programs in the GPU. The GPU EIR analyzed the impact of creating 1,886 additional housing units in the city, double the Regional Housing Needs Allocation (RHNA) of 952 units (City of Eureka, 2018b). As concluded in the GPU, the City of Eureka is largely built out, and few developable sites remain inside the city limits; therefore, the City aims to promote full-build-out of all remaining vacant and underutilized sites in the City, across all zone districts (City of Eureka, 2018b).

Therefore, with the implementation of GPU policies, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

Recreation

The GPU EIR concluded impacts to recreation would be less than significant with the projected physical development and implementation of GPU policies including, but not limited to, those addressing the concern of substantial increases in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, and projects including recreational facilities or requiring construction or expansion of recreational facilities which might have an adverse physical impact (Goal PR-1 and Policies PR-1.1 and PR-1.2) (City of Eureka, 2018b).

The project proposes the redevelopment and densification of a site currently developed with affordable housing as encouraged throughout the policies and implementation programs in the GPU. As discussed in the GPU EIR, the current ratio of community and neighborhoods park space to residence is 4.9 acres per 1,000 residents, well above the recommended 1 acre per 1,000 persons (City of Eureka, 2018b). Additionally, the project is conveniently located within walking or cycling distance to Jefferson Community Center and Hammond Park. Moreover, there are various large open spaces and wildlife areas within and adjacent to the City of Eureka with bus stops near the project site along E Street at the Eureka Municipal Auditorium and Hammond Park, and the project will include onsite recreational facilities for residents.

Therefore, with the implementation of GPU policies, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

Wildfire

The GPU EIR concluded the impacts of wildfires would be less than significant with the implementation of the California Fire Code, Hazardous Materials Transportation regulations, Cal/OSHA regulations and GPU policies, including, but not limited to, the potential to expose people or structures to significant risk or loss, injury or death involving wildfires, including wildfires areas adjacent to urbanized areas or where residences are intermixed with wildlands (Policies HS-5.7, HS-5.10) (City of Eureka, 2018b).

The project proposes the redevelopment and densification of a site currently developed with affordable housing and surrounded by urban uses as encouraged throughout the policies and implementation programs in the GPU. As noted in the GPU EIR, the City of Eureka is not classified by the California Department of Forestry and Fire Protection as being within a high fire hazard severity zone (City of Eureka, 2018b). Therefore, there would be a limited potential for impacts to or from the proposed project related to wildfires.

Therefore, based on the project location, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

Issues Requiring Detailed Analysis

Air Quality

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:	<i>GPU 2040 EIR Impact Conclusions</i>	<i>New Significant Impact Not Identified in GPU 2040 EIR?</i>	<i>If New Significant Impact, Mitigated to Less Than Significant?</i>
a) Conflict with or obstruct implementation of the applicable air quality plan?	Less than Significant	No	N/A (No New Impacts)
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard?	Significant and Unavoidable	No	N/A (No New Impacts)
c) Expose sensitive receptors to substantial pollutant concentrations?	Less than Significant	No	N/A (No New Impacts)
d) Result in other emission (such as those leading to odors) affecting a substantial number of people?	Less than Significant	No	N/A (No New Impacts)

Discussion:

a) *Conflict with or obstruct implementation of the applicable air quality plan?*

The GPU EIR notes that Humboldt County is listed as in "attainment" or "unclassified" for all the federal and state ambient air quality standards except for the state 24-hour particulate matter (PM10) standard (City of Eureka, 2018b). Due to the non-attainment of the state PM10 standard, the North Coast Unified Air Quality Management District (NCUAQMD) prepared a Draft PM10 Attainment Plan in 1995.

The GPU EIR concluded impacts related to conflicting with or obstructing implementation of the Draft PM10 Attainment Plan would be less than significant with the implementation of GPU policies, standards, and implementation measures that support implementation of the PM10 Attainment Plan and other NCUAQMD regulations (City of Eureka, 2018b). These measures address issues including, but not limited to, efficient land use patterns, alternative modes of transportation, and reducing vehicle miles traveled (Policies LU-1.2, LU-1.3, LU-1.19, LU-5.4, LU-5.6, LU-6.2, AQ-1.3, AQ-1.8, M-1.1, M-1.3). The proposed project will comply with these measures (City of Eureka, 2018b).

Therefore, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

- b) *Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard?*

As noted above, Humboldt County is non-attainment for the state 24-hour particulate matter (PM10) standard (City of Eureka, 2018b). The GPU EIR concluded impacts related to increased PM10 emissions would be significant and unavoidable from the General Plan buildout (City of Eureka, 2018b). As noted in the GPU EIR, PM10 emissions are predominantly attributable to mobile sources and the GPU includes policies, standards, and implementation measures to reduce PM10 emissions including, but not limited to, supporting efficient land use patterns, promoting alternative modes of transportation, and reducing vehicle miles traveled (Policies LU-1.2, LU-1.19, LU-6.2, M1.3, M-1.6, M-2.4, M-4.1, AQ-1.9) (City of Eureka, 2018b). Although these measures are anticipated to reduce the generation of PM10, there are no mitigation measures identified that would reduce impacts to a less-than-significant level (City of Eureka, 2018b).

To specifically assess the potential for the project to result in significant impacts from PM10 emissions, both construction and operational emissions for the proposed project were estimated using the California Emissions Estimator Model (CalEEMod), which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies to quantify potential criteria pollutant emissions associated with both construction and operation of a variety of land use projects (see **Attachment 3**). The model applies inherent default values for various land uses, including trip generation rates based on the Institute of Transportation Engineers (ITE) Manual, vehicle mix, trip length, average speed, etc. However, where project-specific data is available, such data should be inputted into the model. Project-specific information from the Project Site Plan, where available, was inputted into the model. Otherwise, where project-specific information was not available, the model default values were used for estimating emissions from the project. For construction emissions, it was assumed that construction of the project would begin in May 2025. For operational emissions, only the emissions from the proposed uses above the existing baseline conditions are calculated (i.e., 32 net new residential units). PM10 is the only criteria pollutant with non-attainment status for Humboldt County. Thus, PM10 is the primary focus of the emissions estimates and analysis in this section. For information purposes only, emissions estimates are also provided for other common air pollutants including ROG, CO, NOx, SOx, and PM2.5.

As noted above, the project is located within the NCUAQMD. In determining whether a project has significant air quality impacts on the environment, it is customary to apply the local air district's thresholds of significance to projects in the environmental review process. For the purposes of assessing air quality impacts in CEQA documents, NCUAQMD Rule 110 – New Source Review (NSR) And Prevention of Significant Deterioration (PSD), which contains thresholds for operational emissions from new stationary sources, is commonly used as a significance threshold for project-level review for land use projects. Although these stationary source emissions thresholds do not directly apply to land use projects, they provide a reference point for levels of emissions that would trigger NCUAQMD requirements for best available control technology and/or mitigation off-sets. As such, these thresholds reflect the best available expert judgment regarding what constitutes significant levels of air pollution within the NCUAQMD and Humboldt County. Per Rule 110, criteria air pollutants from the operation of stationary sources are considered significant if they exceed the following thresholds listed in Table 2 (NCUAQMD, 2015).

Table 2: NCUAQMD Significance Thresholds¹

Pollutant	Significance Thresholds	
	Daily (pounds per day)	Annual (tons per year)
Reactive Organic Compounds	50	40
Nitrogen Oxides	50	40
Carbon Monoxide	500	100
Sulfur Oxides	80	40
Particulate Matter (PM10)	80	15
Particulate Matter (PM2.5)	50	10

1. NCUAQMD, 2015

Tables 3 and 4 below provide the maximum daily construction and operational emissions estimates (unmitigated) from CalEEMod as compared to the significance threshold for PM10 in NCUAQMD Rule 110. For the purposes of this analysis, PM10 emissions from construction and operation of the proposed project would be cumulatively considerable if they exceed the Rule 110 significance threshold (NCUAQMD, 2015).

Table 3: Maximum Daily Construction Emissions (Unmitigated)

Criteria Pollutants	Emissions (pounds per day)					
	ROG	NOx	CO	SOx	PM ₁₀	PM _{2.5}
Maximum Daily Emissions¹	46.2	15.2	16.7	0.03	6.87	3.32
Significance Threshold²	50	50	500	80	80	50
Exceeds Significance Threshold?	NA	NA	NA	NA	No	NA

1. Attachment 3; CAPCOA, 2024
2. NCUAQMD, 2015

Table 4: Maximum Daily Operational Emissions (Unmitigated)

Criteria Pollutants	Emissions (pounds per day)					
	ROG	NOx	CO	SOx	PM ₁₀	PM _{2.5}
Maximum Daily Emissions¹	2.27	0.89	6.29	0.01	0.49	0.14
Significance Threshold²	50	50	500	80	80	50
Exceeds Significance Threshold?	NA	NA	NA	NA	No	NA

1. Attachment 3; CAPCOA, 2024
2. NCUAQMD, 2015

As indicated in **Tables 3 and 4**, the maximum daily construction and operational emissions from the proposed project would be below the NCUAQMD Rule 110 significance threshold for PM10.

As previously discussed, the GPU EIR determined that impacts from PM10 emissions would be significant and unavoidable under General Plan buildout (City of Eureka, 2018b). Although the GPU EIR determined that this impact would be significant and unavoidable, the emissions from the proposed project are well below the NCUAQMD PM10 threshold and the project would not result in a cumulatively considerable net increase of PM10 emissions (City of Eureka, 2018b). Therefore, the

proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

c) *Expose sensitive receptors to substantial pollutant concentrations?*

The GPU EIR concluded impacts to sensitive receptors from pollutant concentrations from implementation of the GPU would be less than significant with the implementation of rules and regulations of the NCUAQMD, California Air Resources Board (CARB), and GPU policies including, but not limited to, those addressing the location of new development and siting of sensitive land uses (Policy AQ-1.3), consultation with the NCUAQMD (Policy AQ-1.5), buffering land uses (Policy AQ-1.8), and best management practices (HS-4.7) (City of Eureka, 2018b).

Toxic air contaminant (TAC) emissions from construction activities would be related to diesel particulate emissions associated with heavy equipment operations during grading, excavation, and transportation activities. Due to the limited scale and duration of construction activities, and the rapid dissipation of diesel particulate emissions with distance, it is not anticipated that sensitive receptors would be exposed to substantial diesel particulate concentrations. Based on the emissions modeling conducted for the project, maximum daily emissions of diesel particulate (modeled by PM_{2.5}, which is conservatively considered a surrogate for diesel particulate), would not exceed 4 pounds per day during construction activity (see **Appendix 2**) (CAPCOA, 2024). This is well below the NCUAQMD significance threshold of 50 pounds per day. Additionally, emissions standards adopted by CARB require engine manufacturers to meet exhaust emission standards that are much cleaner than current levels (CARB, 2022). As a result, construction-related TAC emissions will be less likely to expose sensitive receptors to substantial emissions of TACs as the vehicle fleet is replaced. Construction activities would occur for brief periods of time for each proposed site improvement. Residents located within the vicinity of the project site would be exposed to construction contaminants only for the duration of construction activity. These brief exposure periods would substantially limit exposure to hazardous emissions. Therefore, it is not anticipated that the proposed project's construction activity would expose sensitive receptors to substantial diesel PM concentrations.

The project proposes the redevelopment and densification of a site currently developed with affordable housing as encouraged throughout the polices and implementation programs in the GPU. As concluded in the GPU, the City of Eureka is largely built out and few developable sites remain inside the city limits; therefore, the city aims to promote full-build-out of all remaining vacant and underutilized sites in the city, across all zone districts (City of Eureka, 2018a). The proposed project has been developed with residential uses since the late 1800s and is not located in an area of the City subject to substantial pollutants or emissions. Additionally, the area surrounding the project site is not zoned to allow land uses that are capable of generating substantial pollutant concentrations.

Therefore, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

- d) *Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

The GPU EIR concluded that impacts related to odors affecting a substantial number of people would be less than significant with the implementation of GPU policies (City of Eureka, 2018a). Specifically, Policy AQ-1.6 addresses odor impacts by requiring buffering of uses, facilities, and operations that may produce toxic or hazardous air pollutants and/or odors (e.g., commercial and industrial uses, highways, etc.) to provide an adequate distance from sensitive receptors such as housing and schools, consistent with CARB recommendations (City of Eureka, 2018a).

The GPU EIR also notes that the implementation of the GPU may expose people to odors generated from the operation of diesel-powered construction equipment and/or asphalt paving during the construction period of individual projects (City of Eureka, 2018b). However, these odors would be short term in nature and would not result in permanent impacts to surrounding land uses and would not affect a substantial number of people.

The project proposes the redevelopment and densification of a site currently developed with affordable housing as encouraged throughout the policies and implementation programs in the GPU. As concluded in the GPU, the City of Eureka is largely built out and few developable sites remain inside the city limits; therefore, the city aims to promote full-build-out of all remaining vacant and underutilized sites in the city, across all zone districts (City of Eureka, 2018a). Residential development is considered a sensitive receptor and is not of the nature to generate other emissions such as odors that would affect a substantial number of people.

Therefore, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

Cultural Resources

Would the project:	<i>GPU 2040 EIR Impact Conclusions</i>	<i>New Significant Impact Not Identified in GPU 2040 EIR?</i>	<i>If New Significant Impact, Mitigated to Less Than Significant?</i>
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5	Significant and Unavoidable	No	N/A (No New Impacts)
b) Cause a substantial adverse change in the significance of an archeological resource pursuant to § 15064.5?	Significant and Unavoidable	No	N/A (No New Impacts)
c) Disturb any human remains, including those interred outside of formal cemeteries?	Significant and Unavoidable	No	N/A (No New Impacts)

Discussion:

- a) *Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?*

The GPU EIR concludes that impacts to historical resources are significant and unavoidable under General Plan buildout because there are no feasible or practical policies or mitigation measures available to ensure that the City does not approve the demolition of a historic building or structure (City of Eureka, 2018b).

To determine the potential impacts to cultural resources from the proposed project, a Cultural Resources and Architectural History Inventory Report was prepared for the project (see **Attachment 4**). The Report concluded the following (ECORPS, 2024):

- The 1115 C Street housing complex does not meet any of the criteria for listing in the National Register of Historic Places, California Register of Historic Resources, or the Eureka Local Register of Historic Places, either individually or as part of an existing historic district.
- The existing residential structures at the 1115 C Street housing complex are not considered historical resources for the purposes of CEQA.
- The project would not result in significant indirect impacts to adjacent historic resources either because they are too distant from the project site and/or their view is obstructed, or because the Project would not impact the remaining integrity of these resources.

The structures that currently exist at the project site were constructed in the 1960s. As such, the project site already contains relatively modern buildings for the neighborhood as opposed to developing a vacant lot or converting a historic structure to multi-family use. The project proposes a contemporary (modern) style multi-family affordable housing development that exhibits similar character and scale to the existing residences and other land uses located in the surrounding neighborhood. The architectural design for the C & Clark Project is inspired by the existing architecture of the larger multi-family or institutional uses in the surrounding neighborhood such as

the Municipal Auditorium, California Market, Hillsdale Apartments, and the Humboldt Senior Resource Center. The Humboldt Senior Resource Center (formally the Washington School) was selected as the most suitable historic precedent given its scale and complimentary use to the project proposal (senior, affordable housing project). The project plans illustrate how design elements were taken from the Senior Resource Center to guide the architectural design in a sensitive but also contemporary way. The design elements chosen for architectural compatibility include an articulated roof overhang, window trim and framing, proportional massing, clapboard siding widths, and a celebrated stair entry.

Further, the proposed building is consistent in height with adjacent residential buildings and would not result in any significant shade and shadow impacts to adjacent historic resources. The residence located immediately to the east at 234 Clark Street (built in 1898) is the nearest structure to the site and is designated a historic resource on the City's Local Register of Historic Places (LRHP). In addition, there are also several other homes in the neighborhood on the LRHP, largely built between 1870 and 1910. As indicated by the shadow analysis diagram and rendering in **Attachment 2**, 234 Clark Street will not be shaded by the Project, except during the evening hours in the spring. The lack of shading is due to the fact that 1) the Project's proposed height is only 35 feet, 2) the distance between the adjacent residence at 234 Clark Street and the proposed Project building is approximately 38 feet, and 3) the adjacent residence at 234 Clark Street is taller than the closest portion of the proposed Project building. Based on these factors, the proposed building would not result in significant shading impacts to the adjacent residence at 234 Clark Street.

Additionally, the project is required to be approved by the Design Review Committee, and one of their approval criteria is "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 (City of Eureka, 2023). New buildings may "fit in" with traditional architecture that complements the surrounding context or "stand out" with a contemporary and contrasting style. All buildings must minimize adverse impacts on neighboring properties when possible" (EMC Section 155.412.040.J; City of Eureka, 2023). For all these reasons, the Project will not result in significant impacts to surrounding historic resources.

With all ground-disturbing activities, there is the potential to expose previously unrecorded resources. For this reason, the GPU includes Policy HCP-2.5 (Construction Monitoring), to condition permit approval with requirements for inadvertent discovery and/or monitoring of ground-disturbing activities in areas known or believed to contain buried archaeological or cultural resources (City of Eureka, 2018a). Consistent with this GPU policy, the Cultural Resources and Architectural History Inventory Report recommends that an inadvertent discovery protocol be implemented during ground disturbing activities (ECORPS, 2024). In compliance with GPU Policy HCP-2.5, the project will be conditioned to require implementation of an inadvertent discovery protocol during the proposed construction activities.

As previously discussed, the GPU EIR determined that impacts to historical resources would be significant and unavoidable under General Plan buildout (City of Eureka, 2018b). Although the GPU EIR determined that this impact would be significant and unavoidable, as discussed above, the project does not have the potential to cause direct or indirect impacts to historical resources. Therefore, with the implementation of GPU Policy HCP-2.5, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

b) *Cause a substantial adverse change in the significance of an archeological resource pursuant to § 15064.5?*

The GPU EIR concludes that impacts to archaeological resources are significant and unavoidable under General Plan buildout because there are no feasible or practical policies or mitigation measures available to ensure that archaeological resources are not destroyed inadvertently or when projects are allowed without discretionary review (“by-right”) (City of Eureka, 2018b).

To determine the potential impacts to cultural resources from the proposed project, a Cultural Resources and Architectural History Inventory Report was prepared for the project (see **Attachment 4**). The Report concluded the following (ECORPS, 2024):

- Due to the presence of the previously built environments both within and surrounding the Project Area, the lack of archaeological resources documented in the area, and the distance from a perennial water source, the Project Area has a low potential for buried pre-contact archaeological sites.

With all ground-disturbing activities, there is the potential to expose previously unrecorded resources. For this reason, the GPU includes Policy HCP-2.5 (Construction Monitoring), to condition permit approval with requirements for inadvertent discovery and/or monitoring of ground-disturbing activities in areas known or believed to contain buried archaeological or cultural resources (City of Eureka, 2018a). Consistent with this GPU policy, the Cultural Resources and Architectural History Inventory Report recommends that an inadvertent discovery protocol be implemented during ground disturbing activities (ECORPS, 2024). In compliance with GPU Policy HCP-2.5, the project will be conditioned to require implementation of an inadvertent discovery protocol during the proposed construction activities.

As previously discussed, the GPU EIR determined that impacts to archaeological resources would be significant and unavoidable under General Plan buildout (City of Eureka, 2018b). Although the GPU EIR determined that this impact would be significant and unavoidable, as discussed above, the project site has a low potential for archaeological sites. Therefore, with the implementation of GPU Policy HCP-2.5, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

c) *Disturb any human remains, including those interred outside of formal cemeteries?*

The GPU EIR concludes that impacts to human remains are significant and unavoidable under General Plan buildout because there are no feasible or practical policies or mitigation measures available to ensure that human remains are not destroyed inadvertently or when projects are allowed without discretionary review (“by-right”) (City of Eureka, 2018b).

To determine the potential impacts to cultural resources from the proposed project, a Cultural Resources and Architectural History Inventory Report was prepared for the project (see **Attachment 4**). The Report did not indicate the presence of human remains at the project site.

With all ground-disturbing activities, there is the potential to expose previously unrecorded resources. For this reason, the GPU includes Policy HCP-2.5 (Construction Monitoring), to condition permit approval with requirements for inadvertent discovery and/or monitoring of ground-disturbing activities in areas known or believed to contain buried archaeological or cultural resources (City of Eureka, 2018b). Consistent with this GPU policy, the Cultural Resources and Architectural History Inventory Report recommends that an inadvertent discovery protocol be implemented during ground disturbing activities (ECORPS, 2024). In compliance with GPU Policy HCP-2.5, the project will be conditioned to require implementation of an inadvertent discovery protocol during the proposed construction activities.

As previously discussed, the GPU EIR determined that impacts to human remains would be significant and unavoidable under General Plan buildout (City of Eureka, 2018b). Although the GPU EIR determined that this impact would be significant and unavoidable, as discussed above, the project site does not contain any known human remains (City of Eureka, 2018b). Therefore, with the implementation of GPU Policy HCP-2.5, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

Greenhouse Gas Emissions

Would the project:	<i>GPU 2040 EIR Impact Conclusions</i>	<i>New Significant Impact Not Identified in GPU 2040 EIR?</i>	<i>If New Significant Impact, Mitigated to Less Than Significant?</i>
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Less than Significant	No	N/A (No New Impacts)
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less than Significant	No	N/A (No New Impacts)

Discussion:

- a) *Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*
- b) *Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

The GPU EIR concluded impacts from greenhouse gas emissions would be less than significant with the implementation of NCUAQMD and State regulations and GPU policies including, but not limited to, those that require the incorporation of mitigation measures and best management practices for new discretionary development, promote efficient land use patterns and infill development, promote alternative modes of transportation, and encourage energy conservation and renewable energy facilities (Policies AQ-1.2, AQ-1.3, AQ-1.10, LU-1.2, LU-1.19, LU-6.2, M-1.1, M-1.2, M-1.3, M-1.6, M-2.4, M-4.1, U-5.1, U-5.2, U-5.3, U-5.4, U-5.5, U-5.6) (City of Eureka, 2018b). The GPU EIR concludes that with implementation of these measures, buildout under the General Plan would not conflict with an applicable plan, policy, or regulation, adopted for the purpose of reducing greenhouse gas emissions (City of Eureka, 2018b).

The project proposes the redevelopment and densification of a site currently developed with affordable housing as encouraged throughout the policies and implementation programs in the GPU. As concluded in the GPU, the City of Eureka is largely built out, and few developable sites remain inside the city limits; therefore, the city aims to promote full-build-out of all remaining vacant and underutilized sites in the city across all zone districts (City of Eureka, 2018b). This project would be consistent with the General Plan as it would provide additional residential units on an underutilized infill site that has been used for residential purposes since the late 1800s. Future residents would be within walking distance of shopping, employment, and recreational facilities and would have access to transit and services that would reduce vehicle miles traveled and associated GHG emissions.

The project's estimated construction and operational GHG emissions are provided in **Tables 5 to Table 7**, below. The California Emissions Estimator Model (CalEEMod), which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies to quantify potential criteria pollutant emissions associated with both construction and operation of a

variety of land use projects (see **Attachment 3**). The model applies inherent default values for various land uses, including trip generation rates based on the Institute of Transportation Engineers (ITE) Manual, vehicle mix, trip length, average speed, etc. However, where project-specific data is available, such data should be inputted into the model. Project-specific information from the Project Site Plan, where available, was inputted into the model. Otherwise, where project-specific information was not available, the model default values were used for estimating emissions from the project. For construction emissions, it was assumed that construction of the project would begin in May 2025 and the emissions are amortized over 30 years. For operational emissions, only the emissions from the proposed uses above the existing baseline conditions are calculated (i.e., 32 net new residential units). For reference, the emissions from the existing residential development are also modeled and **Table 7** provides the net difference between the baseline condition and the additional development proposed by the project.

The primary purpose of quantifying the project’s GHG emissions is to satisfy CEQA Guidelines Section 15064.4(a). It is not used as a basis for any significance determination. CEQA Guidelines Section 15064.4 does not establish a threshold of significance, and there is no applicable numeric threshold for the analysis of GHG impacts. It is noted that the GPU EIR analyzed the impact of creating 1,886 additional housing units in the City, which is double the Regional Housing Needs Allocation (RHNA) of 952 units (City of Eureka, 2018b). The GHG emissions that would be generated by construction and operation of the project are within the scope of those analyzed in the GPU EIR because the project is consistent with the overall residential growth projected in the GPU.

Table 5: Maximum Construction Emissions

Project	Maximum Total Emissions (Metric Tons CO2e)
C & Clark Project	91.8
Annual (Amortized over 30 years)	3.06
1. Attachment 3; CAPCOA, 2024	

Table 6: Annual Operational Emissions

Project Operational Emissions	Maximum Annual Emissions (Metric Tons CO2e)
Area	0.40
Energy	37.9
Water/Wastewater	1.62
Mobile	91.9
Solid Waste	7.39
Refrig.	0.04
Total Annual	139.25
1. Attachment 3; CAPCOA, 2024	

Table 7: Total Project Net Emissions

Total Project Emissions	Maximum Annual Emissions (Metric Tons CO2e)
Construction (Amortized 30 years)	3.06
Operation	139.25
Total	142.31
Existing	53.8
Total Net	88.51
1. Attachment 3; CAPCOA, 2024	

The project would comply with all applicable General Plan policies discussed in the GPU EIR, in addition to all other applicable local, regional and State law requirements that reduce GHG emissions, including those discussed in CARB’s updated Scoping Plan. If a residential or mixed-use project is consistent with all of the key project attributes in Table 3 of Appendix D of the 2022 Scoping Plan, it is “clearly” consistent with the policies and goals of the Scoping Plan. However, lead agencies may determine, with adequate additional supporting evidence, that projects that incorporate some, but not all, of the key project attributes are still consistent with the State’s climate goals in the 2022 Scoping Plan. The project meets all but two key project attributes in Table 3 of Appendix D of the 2022 Scoping Plan: 1) the project is located on an infill site that is surrounded by existing urban uses and proposes to redevelop an underutilized site that is presently served by existing utilities and public services; 2) the project would not result in the loss or conversion of natural and working lands; 3) the project proposes transit-supportive densities (greater than 20 residential dwelling units per acre) and is located in proximity to existing transit stops (closest bus stop is approximately 600 feet to the east of the project site along E Street); 4) the project proposes a residential parking supply at a ratio of less than one parking space per dwelling unit (project proposes 44 residential units and 11 parking spaces); 5) the project provides more than 20 percent of its units as affordable to lower income residents; and 6) the project would result in a no net loss of existing affordable units.

Additionally, the design and construction of the residential units would be in accordance with California’s Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6 of the California Code of Regulations). These requirements regulate insulation, window space and type, and other building features to maximize structural energy efficiency. These standards also require the installation of solar panels on the new buildings to offset electricity use. Compliance with local, regional, and State plans, policies, regulations, and requirements would reduce the project’s GHG emissions, including those associated with power generation, water and energy consumption, and mobile and area sources.

Ultimately, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

Hydrology and Water Quality

Would the project:	<i>GPU 2040 EIR Impact Conclusions</i>	<i>New Significant Impact Not Identified in GPU 2040 EIR?</i>	<i>If New Significant Impact, Mitigated to Less Than Significant?</i>
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Less than Significant	No	N/A (No New Impacts)
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Less than Significant	No	N/A (No New Impacts)
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:			
(i) result in substantial erosion or siltation on- or off-site;	Less than Significant	No	N/A (No New Impacts)
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	Less than Significant	No	N/A (No New Impacts)
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of pollute runoff; or	Less than Significant	No	N/A (No New Impacts)
(iv) impede or redirect flood flows?	Less than Significant	No	N/A (No New Impacts)
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Less than Significant	No	N/A (No New Impacts)
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Less than Significant	No	N/A (No New Impacts)

Discussion:

- a) *Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

The GPU EIR concluded that impacts to water quality standards or waste discharge requirements would be less than significant with the implementation of GPU policies, standards, and implementation measures that include policies designed to protect water quality resources to ensure adherence to stormwater pollution prevention measures (Policy NR-1.6) (City of Eureka, 2018b).

Construction projects are required to prepare and implement either a Stormwater Pollution Prevention Plan (for projects disturbing one or more acre of land) or an Erosion and Sediment Control Plan (for projects that disturb less than one acre but involve over 50 cubic yards of earthwork) (City of Eureka, 2018b). The project will disturb less than one acre of land, and will therefore be required to prepare and implement an Erosion and Sediment Control Plan, including depicting stormwater flow across the project site; demonstrating BMPs to be used during construction; depicting locations of stockpiles, porta potties, dumpsters, etc. and describing BMPs to prevent resulting pollution; depicting where stormwater run-on may be experienced and describing how it will be addressed; describing how excessive wind will be addressed; and providing contact information of the individual responsible for installing and maintaining BMPs who will ensure BMPs are in place before commencing any earthwork and will contact the City's Engineering Division 24 hours in advance for inspection.

Post-construction stormwater management is regulated under the City's MS4 Permit which requires the on-site management of stormwater so that runoff does not exceed pre-project conditions. Because over 5,000 sf of impervious surface is proposed to be replaced on the project site, the project will be classified as a "Regulated Project" according to the MS4 Permit and will be required to prepare a post-construction Stormwater Control Plan to ensure stormwater runoff is adequately managed consistent with the Humboldt Low Impact Development Stormwater Manual for the life of the development.

Grading and drainage improvements would occur in compliance with Chapter 150 (Building Regulations) and Chapter 54 (Stormwater Quality Management and Discharge Control) of the Eureka Municipal Code (City of Eureka, 2023). As part of the building permit process, the applicant is required to provide documentation demonstrating that the project meets the City's MS4 development standards and site design measure requirements to Public Works – Engineering. The project would comply with all applicable requirements of the Eureka Municipal Code and MS4 Permit.

Therefore, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

- b) *Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

The GPU EIR concluded that impacts to groundwater supplies or groundwater recharge would be less than significant due to existing laws, policies and regulations protecting critical groundwater supplies, including the Humboldt Bay Municipal Water District Groundwater Management Plan and GPU policies including, but not limited to, those addressing protecting and preserving important groundwater recharge areas (NR-1.2 and U-1.4) and encouraging installation of pervious pavement and surfaces (NR-1.11) (City of Eureka, 2018b).

As discussed in the GPU EIR, the City has a water right to 8.0 million gallons per day from the Mad River; the Humboldt Bay Municipal Water District (HBMWD) supplies this water to the City. The HBMWD draws water from the unconfined Holocene River Channel Deposits aquifer at a depth of 60 to 90 feet below the bed of the Mad River through Ranney wells situated in or in close proximity to the Mad River. Water is extracted from this aquifer instead of directly from the river since percolation through surface ground layers helps to naturally filter water and improve quality of the drinking water supply. The amount of water supplied to the City under existing conditions is less than 1 percent of the annual yield of the Mad River. The HBMWD Groundwater Management Plan indicates that groundwater recharge is achieved by inundation of the recharge areas in the Mad River channel through the District's operation of Matthews Dam and Ruth Lake. As a result, additional development within the City would not have a direct impact on the volume of groundwater available to HBMWD. Additionally, the HBMWD has indicated that there is sufficient supply for currently forecasted development. Additionally, the HBMWD is required to comply with the applicable requirements intended to protect and preserve groundwater and groundwater recharge including its Groundwater Management Plan (City of Eureka, 2018b).

The project site is already developed with buildings, surface parking, and walkways and the project will not rely directly on groundwater and will be required to manage stormwater consistent with the City's MS4 Permit and the Humboldt Low Impact Development Stormwater Manual for the life of the development.

Therefore, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

- c) *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*
 - (i) *result in substantial erosion or siltation on-or off-site;*

As described in the GP EIR, the City is principally a developed, urban landscape, and, as a result, drainage patterns have been changed substantially compared to historical conditions. The GPU EIR concludes that impacts related to erosion and siltation would be less than significant with the implementation of GPU policies that address preserving non-urban areas, gulches and drainage areas (NR-1.3), maintaining use of natural stormwater drainage systems (U-3.4), and minimizing impervious surfaces and maintaining natural site drainage conditions (U-3.12) (City of Eureka, 2018b). The project would comply with all such applicable GPU requirements.

As discussed in other sections of this document, the project site is located in an area of the City that has been developed since the late 1800s and does not contain any streams or rivers. As such, the project would not result in the alteration of a natural drainage feature. Approximately 53 percent of the project site is currently developed with impervious surfaces including buildings, surface parking, and walkways. Stormwater runoff at the project site either infiltrates into the ground onsite or flows to drainage inlets at the intersection of C and Clark Streets. As described under subsection (a) above, the project will be required to prepare and implement a construction-phase Erosion and Sediment Control Plan and a post-construction Stormwater Control Plan and incorporate low impact development site design measures and appropriate BMPs to minimize stormwater runoff and pollutants entering drainage facilities. Compliance with these existing regulatory standards would prevent the project from causing substantial erosion or siltation. Additionally, by increasing the density and intensity of use of a previously disturbed and paved infill site, the project helps reduce growth pressure on undeveloped natural resource lands and open space areas and minimizes increases in impervious surfaces.

Therefore, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

- (ii) *substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;*

The GPU EIR concludes that impacts related to flooding from increases in surface runoff would be less than significant with the implementation of GPU policies including, but not limited to, those requiring implementation of BMPs to minimize erosion and sedimentation from construction of new impervious surfaces (NR-1.5) and new projects minimizing impervious surfaces and maintaining natural site drainage conditions (U-3.12). The GPU also focuses on increasing density within already developed areas and infill of vacant or underutilized areas, which is consistent with the project proposal. The project would comply with all such applicable GPU requirements (City of Eureka, 2018b).

As discussed in other sections of this document, the project site is located in an area of the City that has been developed since the late 1800s and does not contain any streams or rivers. As such, the project would not result in the alteration of a natural drainage feature. Approximately 53 percent of the project site is currently developed with impervious surfaces including buildings, surface parking, and walkways. Stormwater runoff at the project site either infiltrates into the ground onsite or flows to drainage inlets at the intersection of C and Clark Streets. As described under subsection (a) above, the project will be required to prepare and implement a construction-phase Erosion and Sediment Control Plan and a post-construction Stormwater Control Plan and incorporate low impact development site design measures and appropriate BMPs to minimize stormwater runoff and pollutants entering drainage facilities. Compliance with these existing regulatory standards would prevent the project from substantially increasing the rate or amount of surface runoff and resulting in flooding on- or off-site. Additionally, by increasing the density and intensity of use of a previously disturbed and paved infill site, the project helps reduce growth pressure on undeveloped natural resource lands and open space areas and minimizes increases in impervious surfaces.

Therefore, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

The GPU EIR concludes that potential increase in impervious area would be minimized as the GPU policies focus on increasing development density within already developed areas and infill of vacant or underutilized areas. The GPU EIR concluded that impacts related to exceeding the capacity of the City's stormwater system or providing additional sources of polluted runoff would be less than significant with the implementation of GPU policies. Specifically, these policies include, but are not limited to, requiring new projects to minimize impervious surfaces and retain natural site drainage (U-3.12) and new development and redevelopment being required to incorporate low impact development measures and appropriate BMPs to minimize stormwater runoff and pollutants entering drainage facilities (U-3.11) (City of Eureka, 2018b). The project would comply with all such applicable GPU requirements.

As discussed in other sections of this document, the project site is located in an area of the City that has been developed since the late 1800s and does not contain any streams or rivers. As such, the project would not result in the alteration of a natural drainage feature. Approximately 53 percent of the project site is currently developed with impervious surfaces including buildings, surface parking, and walkways. Stormwater runoff at the project site either infiltrates into the ground onsite or flows to drainage inlets at the intersection of C and Clark Streets. As described under subsection (a) above, the project will be required to prepare and implement a construction-phase Erosion and Sediment Control Plan and a post-construction Stormwater Control Plan and incorporate low impact development site design measures and appropriate BMPs to minimize stormwater runoff and pollutants entering drainage facilities. Compliance with these existing regulatory standards would substantially reduce the potential for runoff from the site to exceed the capacity of the City's stormwater system or provide additional sources of polluted runoff. Additionally, by increasing the density and intensity of use of a previously disturbed and paved infill site, the project helps reduce growth pressure on undeveloped natural resource lands and open space areas and minimizes increases in impervious surfaces.

Therefore, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

(iv) impede or redirect flood flows?

The GPU EIR concluded that impacts related to impeding or redirecting flood flows would be less than significant due to GPU policies including, but not limited to, those addressing the protection of residents from flood hazards. These include GP Policy HS-2.1, which prohibits the construction of new land uses within the 100-year floodplain unless the structure and subsequent road access is elevated above the base flood elevation (City of Eureka, 2018b). The current Flood Insurance Rate Maps prepared by the Federal Emergency Management Agency in 2017 show that the project site is not within an area that would be subject to inundation during the 100-year flood

event (FEMA, 2017). The GPU EIR concludes that if housing is placed outside of special flood hazard areas, impacts would be less than significant (City of Eureka, 2018b).

Therefore, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

d) *In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?*

The GPU EIR includes an evaluation of inundation risk from levee failure, sea level rise, seiches, and tsunamis, and concludes that adherence to the GPU policies would have a less than significant impact related to these hazards (City of Eureka, 2018b).

The project proposes the redevelopment and densification of a site currently developed with affordable housing as encouraged throughout the polices and implementation programs in the GPU. Based on the City's Web GIS, the project site is located in an elevated area of the City of Eureka away from natural drainages and large water bodies and is not subject to flood hazards, tsunamis, or seiches (City of Eureka, 2024a).

Based on the 2017 Flood Insurance Rate Map (FIRM; Panel 06023C0845G, eff. 6/21/2017), the project site is in Zone X, which is an "Area of Minimal Flood Hazard" (FEMA, 2017). As such, the project site is not in a special flood hazard area (SFHA) or a base floodplain.

Additionally, based on the LiDAR on the City's Web GIS, the site is at ~51-60 feet in elevation (NAVD88) (City of Eureka, 2024a). Additionally, the site is over 3,000 feet from Humboldt Bay. According to the Humboldt County Geographic Information System, the site is located outside and above the tsunami inundation zone (Humboldt County, 2024). It is expected that the impact of a tsunami on Humboldt Bay would primarily occur along the north and south spits and the King Salmon and Fields Landing areas, which are located directly across from the opening to Humboldt Bay. There are some areas of the City of Eureka, immediately adjacent to Humboldt Bay and the gulches that flow to the bay, that are within a potential tsunami hazard zone (Humboldt County, 2024). Based on the elevation of the project site and the distance from Humboldt Bay, it is not anticipated that adverse impacts would occur to the proposed development from tsunami inundation.

Therefore, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

e) *Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

As previously discussed above in subsections a) and b), the GPU EIR concluded that the projected General Plan buildout would result in less than significant impacts related to conflicting with or obstructing implementation of a water control plan or sustainable groundwater management plan (City of Eureka, 2018b), and the proposed project is consistent with the GPU. Therefore, the proposed project would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

Noise

Would the project:	<i>GPU 2040 EIR Impact Conclusions</i>	<i>New Significant Impact Not Identified in GPU 2040 EIR?</i>	<i>If New Significant Impact, Mitigated to Less Than Significant?</i>
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Less than Significant	No	N/A (No New Impacts)
b) Generation of excessive groundborne vibration or groundborne noise levels?	Less than Significant	No	N/A (No New Impacts)
c) For a project located within the vicinity of a private airstrip or airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	Less than Significant	No	N/A (No New Impacts)

Discussion:

- a) *Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

The GPU EIR concluded that impacts from noise generated by construction and operation of future development under the General Plan buildout would be less than significant with the implementation of GPU policies including, but not limited to, those that require limitation on the hours of construction activity, require new stationary sources (e.g., HVAC units, loading docks, generator, etc.) to mitigate noise impacts on noise-sensitive uses when noise standards are exceeded, and require an acoustical analysis to be prepared for projects that involve development of sensitive land uses to ensure the City noise standards are not exceeded (Policies N-1.5, N.1-8, N-1.13). The GPU EIR also determined that the increase from vehicular traffic along local roadways from General Plan buildout would not result in the exposure of adjacent existing sensitive land uses to significant impacts from vehicular traffic noise. The project would comply with all of these applicable GPU policies (City of Eureka, 2018b). Through the project entitlement process, the City will require noise-generating construction activities to be limited to the hours of 7 AM to 7 PM consistent with GPU Policy N-1.13.

Further, consistent with the GPU Policies N-1.5 and N.1.8, a noise assessment was prepared for the project, which determined the following (see **Attachment 6**) (MD Acoustics, 2024):

- Noise from stationary sources during operation of the project (i.e., HVAC units) would be consistent with the City’s General Plan standards of 55 dBA Leq for stationary sources and 65 dBA CNEL for multi-family residential uses.
- The exterior noise levels for the existing plus project traffic scenario at the residential units would be consistent with the General Plan standard of 65 dBA CNEL for multi-family residential uses.
- The interior noise levels would be consistent with the General Plan standards of 45 dBA CNEL for residential uses with standard building construction.
- In compliance with General Plan Policy N-1.13, which limits construction activity to the hours of 7 a.m. to 7 p.m., construction noise impacts would be less than significant.
- Project construction noise would be between 69 and 80 dBA Leq at the nearest sensitive receptors, which meets the 80 dBA Leq construction noise limit recommended by the Federal Transit Administration Transit Noise and Vibration Impact Assessment Manual.

Therefore, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

b) *Generation of excessive groundborne vibration or groundborne noise levels?*

The GPU EIR concluded that impacts from noise generated by construction and operation of future development under the General Plan buildout would be less than significant with the implementation of GPU policies including, but not limited to, those that require assessment of vibration potential when projects are proposed in the vicinity of sensitive receptors, historic buildings, and archaeological sites (Policy N-1.14) (City of Eureka, 2018b).

Consistent with General Plan Policy N-1.14, the noise assessment completed for the project included an analysis of potential vibration impacts from project construction activities (see **Attachment 6**). The vibration assessment determined that the worst-case scenario vibration would be 0.145 PPV (in/sec), which is perceptible but below any risk of damage. As such, the assessment determined that impacts from construction vibration would be less than significant (MD Acoustics, 2024).

Therefore, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

c) *For a project located within the vicinity of a private airstrip or airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

The GPU EIR states that Murray Field and Samoa Field are the only airports located within two miles of the Eureka City limits (City of Eureka, 2018b). The project site is not located within 2 miles of an airport and is not located within the boundary of an Airport Influence Area and Airport Compatibility Zone (Humboldt County, 2024). The GPU EIR concludes that this impact would be less than significant because there are no sensitive land uses in the General Plan proposed within either airport’s 65 CNEL contour (City of Eureka, 2018b).

Therefore, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

Public Services

Would the project:	<i>GPU 2040 EIR Impact Conclusions</i>	<i>New Significant Impact Not Identified in GPU 2040 EIR?</i>	<i>If New Significant Impact, Mitigated to Less Than Significant?</i>
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objective for any of the public services:			
Fire protection?	Less than Significant	No	N/A (No New Impacts)
Police protection?	Less than Significant	No	N/A (No New Impacts)
Schools?	Less than Significant	No	N/A (No New Impacts)
Parks?	Less than Significant	No	N/A (No New Impacts)
Other public facilities?	Less than Significant	No	N/A (No New Impacts)

Discussion:

- a) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objective for any of the public services:*

Fire protection?

Humboldt Bay Fire provides fire protection services to the project site. The GPU EIR concluded impacts to fire protection services would be less than significant with adequate response times and ISO ratings, and with implementation of GPU policies, including, but not limited to, those designed to protect fire protection systems and resources (Policies CS-2.1, CS-2.2, CS-2.3, and CS-2.4), to provide the framework for annually assessing fire protection services including maintaining an ISO rating of 3 or higher, and maintaining an average response time of three minutes for all service calls (Policies CS-2.3 and CS-2.4) (City of Eureka, 2018b). The project would comply with all such applicable GPU requirements.

In addition, it is noted that the GPU EIR analyzed the impact of creating 1,886 additional housing units in the City, which is double the Regional Housing Needs Allocation (RHNA) of 952 units. The GPU EIR determined future growth and development over the course of 20 years would potentially generate the need for new fire facilities, vehicles, equipment, and personnel to adequately serve response times; however, it would not result in substantial changes to the fire protection services, as changes would be gradual and distributed broadly and incrementally (City of Eureka, 2018b). The Eureka Police Department Headquarters is located at 604 C Street (~0.30 miles north of the project site). The closest Humboldt Bay Fire Station is located at 533 C Street (~0.35 miles north of the project site). The project is consistent with the growth assumption underlying the GPU EIR.

Therefore, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

Police protection?

The GPU EIR concluded impacts to police protection services would be less than significant with adequate service ratios, with implementation of GPU policies, including, but not limited to, those designed to protect and enhance law enforcement resources (Policies CS-1.1, CS-1.2, CS-1.5, and CS-1.6. Policy CS-1.1), law enforcement staffing, equipment, and response times (Policies CS-1.3 and CS-1.4) (City of Eureka, 2018b). The project would comply with all such applicable GPU requirements.

In addition, it is noted that the GPU EIR analyzed the impact of creating 1,886 additional housing units in the City, which is double the Regional Housing Needs Allocation (RHNA) of 952 units (City of Eureka, 2018b). The City of Eureka Police Department is a full-service department with a service ratio of approximately 1.98 sworn personnel and 0.99 non-sworn personnel staff per 1,000 residents, which is above the proposed standard of police staff ratio of 2.8 personnel per 1,000 residents (1.0 non-sworn and 1.8 sworn). The GPU EIR determined additional police facilities, vehicles, equipment, and additional personnel would likely be required to provide adequate response times to serve future growth, but with a modest, gradual, and broadly distributed program of physical development and population growth, impacts to law enforcement resources are anticipated to be minimal (City of Eureka, 2018b). The project is consistent with the growth assumptions underlying the GPU EIR.

Therefore, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

Schools?

The Eureka City School District provides services to the project site. The GPU EIR concluded impacts to the School District would be less than significant with a modest, gradual, and broadly distributed program of physical development and implementation of GPU policies, including, but not limited to, those designed to protect and enhance educational resources (Policies CS-3.1, CS-3.2, CS-3.3, CS-3.4, CS-3.5) (City of Eureka, 2018b). The project would comply with all such applicable GPU requirements.

In addition, it is noted that the GPU EIR analyzed the impact of creating 1,886 additional housing units in the city (approximately 3,683 additional residents), which is double the Regional Housing Needs Allocation (RHNA) of 952 (City of Eureka, 2018b).

The GPU EIR determined future growth and development over the course of 20 years would potentially generate the need for new or upgraded facilities and personnel; however, it would not result in substantial changes to educational resources, as changes are anticipated to be distributed broadly and incrementally across the 16.4-square-mile City (City of Eureka, 2018b). Additionally, since the project proposes the development of housing for seniors, it is anticipated that a minimal increase in the student population of local elementary, junior, and high schools would occur as a result of the project. The project is consistent with the growth assumptions underlying the GPU EIR.

Therefore, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

Parks?

The GPU EIR concluded impacts to park facilities would be less than significant with implementation of GPU policies, including, but not limited to, those addressing park resources (Goal PR-1, Policies PR-1.1 and PR-1.2) (City of Eureka, 2018b). These policies address the need to maintain and adapt parkland standards to meet the needs of the community, and to also address the development of a Strategic Plan for the Eureka Open Space, Parks, and Recreation Commission (City of Eureka, 2018b). The project would comply with all such applicable GPU requirements.

In addition, it is noted that the GPU EIR analyzed the impact of creating 1,886 additional housing units in the City, which is double the Regional Housing Needs Allocation (RHNA) of 952 units (City of Eureka, 2018b). As noted in the GPU EIR, the General Plan policies specify a ratio of park space to population of 1 acre per 1,000 population. Currently, the ratio of community and neighborhood park space to residents is approximately 4.9 acres per 1,000 residents, which is substantially greater than the General Plan policy recommendation (City of Eureka, 2018b). The GPU EIR concluded that no additional park facilities would be required to be developed to accommodate the 1,886 additional housing units projected in the GPU (City of Eureka, 2018b). The project is consistent with the growth assumptions underlying the GPU EIR.

Therefore, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

Other public facilities?

The GPU EIR concluded impacts to library and community services would be less than significant with implementation of GPU policies, including, but not limited to, those addressing the protection of library services (Policies CS-4.1 through CS-4.3), and the protection of community services (Policies PR-1.12 and AC-2.9) (City of Eureka, 2018b). The project would comply with all such applicable GPU requirements.

In addition, it is noted that the GPU EIR analyzed the impact of creating 1,886 additional housing units in the City, which is double the Regional Housing Needs Allocation (RHNA) of 952 units (City of Eureka, 2018b). The GPU EIR determined future growth and development over the course of 20 years would potentially result in gradual physical changes (City of Eureka, 2018b). The project is consistent with the growth assumptions underlying the GPU EIR.

Therefore, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

Transportation

Would the project:	<i>GPU 2040 EIR Impact Conclusions</i>	<i>New Significant Impact Not Identified in GPU 2040 EIR?</i>	<i>If New Significant Impact, Mitigated to Less Than Significant?</i>
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?	Less than Significant	No	N/A (No New Impacts)
b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	Significant and Unavoidable	No	N/A (No New Impacts)
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less than Significant	No	N/A (No New Impacts)
d) Result in inadequate emergency access?	Less than Significant	No	N/A (No New Impacts)

Discussion:

- a) *Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?*

The GPU EIR concluded that this impact would be less than significant under General Plan buildout with the implementation of GPU policies intended to address potential impacts on alternative modes of transport and mobility, such as pedestrian circulation, bicycle paths, and transit. The policies that address potential transportation impacts include safety and mobility-related policies M-1.1. through M-1.9, pedestrian and bicyclist related policies M-3.1 through M-3.12, and transit operations and accessibility related policies M-4.1 through M-4.1. Additionally, the GPU EIR concludes that the General Plan's overall concept of infill and densification within and around the City's Core Area (Downtown, Old Town, the Commercial Bayfront, and Library District) would serve to enhance opportunities for development that is compact, walkable, and transit-friendly (Policy M-1.6) (City of Eureka, 2018b). The project site is approximately 0.25 miles (1,300 ft) south of the City's Core Area (Downtown), which offers a range of visitor services within walking distance, such as retail storefronts, restaurants, offices, cultural facilities, and theaters (City of Eureka, 2018a).

The project proposes the redevelopment and densification of a site currently developed with affordable housing as encouraged throughout the policies and implementation programs in the GPU. As concluded in the GPU, the City of Eureka is largely built out, and few developable sites remain inside the city limits; therefore, the city aims to promote full-build-out of all remaining vacant and underutilized sites in the city across all zone districts (City of Eureka, 2018b). This project would be consistent with the General Plan as it would provide additional residential units on an underutilized infill site that has been used for residential purposes since the late 1800s. Future residents would be

within walking distance of shopping, employment, and recreational facilities and would have access to transit and services that would reduce vehicle miles traveled and encourage use of alternative modes of transportation.

The 2040 General Plan and GPU EIR do include policies and evaluation regarding level of service (LOS), but 2040 General Plan Policy M-2.4 calls for the City to consider the applicability of using transportation performance metrics such as VMT and associated thresholds for measuring transportation system impacts consistent with the CEQA Guidelines and State law, as well as for making General Plan consistency determinations. In addition, in a recent amicus brief filed by the California Attorney General Rob Bonta in a CEQA case involving the City, the Attorney General confirmed LOS impacts can be disregarded in further CEQA analysis related to the City's GPU EIR. As stated in the brief:

"If an agency has a certified EIR that used the LOS method before the VMT mandate, and then prepares an addendum to that EIR after the VMT mandate, the agency can choose to use the old LOS method rather than the new VMT method to compare the environmental impacts. (Olden Properties Corp. v. City of Newport Beach (2023) 93 Cal.App.5th 270, 280–281.) Otherwise, the agency would be required to conduct a new traffic analysis from scratch, or compare "LOS apples to VMT oranges," instead of relying upon the analysis in the original EIR. (Ibid.) But LOS is no longer ever required. An agency should shift exclusively to a VMT analysis in environmental documents when possible including, as here, when the prior EIR analysis used both methods. (See OPR, Technical Advisory on Evaluating Transportation Impacts in CEQA, Dec. 2018, p. 18–19.) Here, the City appropriately shifted to using the VMT method in furtherance of CEQA and state policy."

Therefore, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

b) *Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?*

The GPU EIR concludes that although the GPU contains a number of policies that are directed towards lessening impacts from vehicle miles traveled (VMT), per-capita VMT is projected to decrease only slightly over the next 20 years. As such, the GPU EIR concludes that VMT impacts under General Plan buildout would be significant and unavoidable (City of Eureka, 2018b).

To specifically assess the potential VMT impacts of the proposed project, a VMT Screening Report was prepared for the project (see **Attachment 7**). As stated in the Report (TJW Engineering, 2024):

"The Governor's Office Of Planning And Research Technical Advisory On Evaluating Transportation Impacts In CEQA (OPR Technical Advisory) (Dec 2018) provides recommendations for screening criteria and requirements for VMT assessments. Recommended screening criteria include the presumption of less-than-significant impact by affordable housing as it generally improves job-to-housing match, in turn shortening commutes and reducing VMT. Because the proposed project is for the construction of affordable housing, when completed it is expected to reduce VMT indicating a less-than-significant impact. Therefore, the need for a VMT analysis is not substantiated."

As discussed previously, the project proposes the redevelopment and densification of a site currently developed with affordable housing as encouraged throughout the policies and implementation

programs in the GPU. As concluded in the GPU, the City of Eureka is largely built out, and few developable sites remain inside the city limits; therefore, the city aims to promote full-build-out of all remaining vacant and underutilized sites in the city across all zone districts (City of Eureka, 2018a). This project would be consistent with the General Plan as it would provide additional residential units on an underutilized infill site that has been used for residential purposes since the late 1800s. Future residents would be within walking distance of shopping, employment, and recreational facilities and would have access to transit and services that would reduce vehicle miles traveled.

As previously discussed, the GPU EIR determined that impacts from VMT would be significant and unavoidable under General Plan buildout (City of Eureka, 2018b). Although the GPU EIR determined that this impact would be significant and unavoidable, the guidance from the State recommends the presumption that affordable housing in infill locations would result in less than significant impacts as it generally results in VMT reductions. Additionally, according to OPR's Site Check Tool, VMT per capita in the City of Eureka is 15% or more below the regional average (OPR, 2024). Therefore, based on the location of the project and the proposed land uses, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

- c) *Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

The GPU EIR concluded impacts from the increase of hazards due to design features or incompatible uses would be less than significant with the implementation of design standards and GPU policies, including, but not limited to, those addressing complete street directives (Policies M-1.1 through M-1.9), design standards (Policy M-2.5), improved circulation for pedestrians and bicyclists (Policies M-3.1 through M-3.12), and enhancement in goods movement (Policies M-7.1 through M-7.3) (City of Eureka, 2018b). The project would comply with all such applicable GPU requirements.

The proposed project would occur on a site that has been used for residential purposes since the late 1800s and would use the existing street network that has been designed to comply with standard engineering and design requirements for adequate circulation. For access to off-street parking, the future residents would use the alleyway along the southern property line, consistent with how parking has been accessed since the 1960s for the existing affordable housing. The project proposes improvements to the existing infrastructure serving the site, which would be reviewed by the City Public Works and Engineering Divisions to ensure that it would not increase hazards.

Therefore, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

- d) *Result in inadequate emergency access?*

The GPU EIR concluded that impacts related to inadequate emergency access would be less than significant with the implementation of design standards and GPU policies, including, but not limited to, those addressing complete street directives (Policies M-1.1 through M-1.9), design standards (Policy M-2.5), improved circulation for pedestrians and bicyclists (Policies M-3.1 through M-3.12), and enhancement in goods movement (Policies M-7.1 through M-7.3). The GPU EIR in some cases expects traffic operations to improve and delays to decrease, providing improved timeliness for

emergency access (City of Eureka, 2018b). As discussed previously, the project proposes improvements to the existing infrastructure serving the site where necessary, which would be reviewed by the Engineering Division of Public Works, Development Services – Building, and the Fire Department, to ensure that it would not restrict emergency access. The project would comply with all such applicable GPU requirements.

Therefore, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

Tribal Cultural Resources

Would the project:	<i>GPU 2040 EIR Impact Conclusions</i>	<i>New Significant Impact Not Identified in GPU 2040 EIR?</i>	<i>If New Significant Impact, Mitigated to Less Than Significant?</i>
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resources, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:			
(i) Listed or eligible for listing in the California Register of Historical Resources, or in the local register of historical resources as defined in Public Resources Code Section 5020.1 (k), or	Significant and Unavoidable	No	N/A (No New Impacts)
(ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of the Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native tribe.	Significant and Unavoidable	No	N/A (No New Impacts)

Discussion:

- a) *Would the project cause a substantial adverse change in the significance of a tribal cultural resources, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:*
 - (i) *Listed or eligible for listing in the California Register of Historical Resources, or in the local register of historical resources as defined in Public Resources Code Section 5020.1 (k), or*

The GPU EIR concludes that impacts to tribal cultural resources are significant and unavoidable under General Plan buildout because there are no feasible or practical policies or mitigation

measures available to ensure that tribal cultural resources are not destroyed inadvertently or when projects are allowed without discretionary review (“by-right”) (City of Eureka, 2018b).

To determine the potential impacts to cultural resources from the proposed project, a Cultural Resources and Architectural History Inventory Report was prepared for the project (see **Attachment 4**). The Report concluded the following (ECORPS, 2024):

- Due to the presence of the previously built environments both within and surrounding the Project Area, the lack of archaeological resources documented in the area, and the distance from a perennial water source, the Project Area has a low potential for buried pre-contact archaeological sites.
- No potential for indirect impacts to adjacent historic properties or historical resources was identified.

With all ground-disturbing activities, there is the potential to expose previously unrecorded resources. For this reason, the GPU includes Policy HCP-2.5 (Construction Monitoring), to condition permit approval with inadvertent discovery language and/or require monitoring of ground-disturbing activities in areas known or believed to contain buried archaeological or cultural resources (City of Eureka, 2018a). Consistent with this GPU policy, the Cultural Resources and Architectural History Inventory Report recommends that an inadvertent discovery protocol be implemented during ground disturbing activities (ECORPS, 2024). In compliance with GPU Policy HCP-2.5, the project will be conditioned to require implementation of an inadvertent discovery protocol during the proposed construction activities.

As previously discussed, the GPU EIR determined that impacts to tribal cultural resources would be significant and unavoidable under General Plan buildout (City of Eureka, 2018b). Although the GPU EIR determined that this impact would be significant and unavoidable, as discussed above, the project site does not contain any known tribal cultural resources. Therefore, with the implementation of GPU Policy HCP-2.5, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

- (ii) *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of the Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native tribe.*

The GPU EIR notes that given the long history of prehistoric and historic-period human occupation, the City is considered sensitive for the presence of subsurface prehistoric, Native American, and historic-period cultural resources and human remains. As part of the GPU and EIR process, the City consulted with Native American tribes, providing local tribes the opportunity to participate in local land use decisions and to protect, or mitigate impacts to cultural places. The City and tribal representatives agreed to continue consultation with the tribes and the GPU includes policies to identify and protect tribal cultural resources that could be adversely affected by development activities. These include, but are not limited to, consultation with local tribes to identify and protect tribal cultural resources (Policy HCP-2.1) and requirements for implementing an inadvertent discovery protocol and construction monitoring (Policy HCP-2.5) (City of Eureka, 2018b). The project would comply with all such applicable GPU requirements.

To determine the potential impacts to cultural resources from the proposed project, a Cultural Resources and Architectural History Inventory Report was prepared for the project (see **Attachment 4**). The Report concluded the following (ECORPS, 2024):

- Due to the presence of the previously built environments both within and surrounding the Project Area, the lack of archaeological resources documented in the area, and the distance from a perennial water source, the Project Area has a low potential for buried pre-contact archaeological sites.
- No potential for indirect impacts to adjacent historic properties or historical resources was identified.

As part of the design review process required for the project, the City sent out project referrals to the Tribal Historic Preservation Officers (THPOs) of the Wiyot Tribe, the Bear River Band, and the Blue Lake Rancheria on Monday, June 10, 2024. On June 12, 2024, one comment was received from the Bear River Band THPO again requesting standard inadvertent discovery protocol. Pursuant to Section 106 of the National Historic Preservation Act, the City also requested consultation in letters dated April 22, 2024 with the Tribes that have a current or ancestral interest in the project area. The Bear River Band and Wiyot Tribe THPOs responded again requesting implementation of an inadvertent discovery protocol during project construction.

With all ground-disturbing activities, there is the potential to expose previously unrecorded resources. For this reason, the GPU includes Policy HCP-2.5 (Construction Monitoring), to condition permit approval with inadvertent discovery requirements and/or monitoring of ground-disturbing activities in areas known or believed to contain buried archaeological or cultural resources. Consistent with this GPU policy, the Cultural Resources and Architectural History Inventory Report recommends that an inadvertent discovery protocol be implemented during ground disturbing activities (City of Eureka, 2018a). In compliance with GPU Policy HCP-2.5, the report recommendations, and the request of the THPOs, the project will be conditioned to require implementation of an inadvertent discovery protocol during the proposed construction activities.

As previously discussed, the GPU EIR determined that impacts to tribal cultural resources would be significant and unavoidable under General Plan buildout (City of Eureka, 2018b). Although the GPU EIR determined that this impact would be significant and unavoidable, as discussed above, the project site does not contain any known tribal cultural resources. Therefore, with the implementation of GPU Policy HCP-2.5, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

Utilities and Service Systems

Would the project:	<i>GPU 2040 EIR Impact Conclusions</i>	<i>New Significant Impact Not Identified in GPU 2040 EIR?</i>	<i>If New Significant Impact, Mitigated to Less Than Significant?</i>
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relation of which could cause significant environmental effects?	Less than Significant	No	N/A (No New Impacts)
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	Less than Significant	No	N/A (No New Impacts)
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less than Significant	No	N/A (No New Impacts)
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	Less than Significant	No	N/A (No New Impacts)
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	Less than Significant	No	N/A (No New Impacts)

Discussion:

- a) *Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relation of which could cause significant environmental effects?*

The GPU EIR states that approximately 1,886 additional dwelling units are projected to be developed within the City during the GPU planning period, and it is expected that demand for expanded water, wastewater treatment, storm water drainage, electric power, natural gas, and telecommunications facilities would continue to increase with projected population and job growth. The GPU EIR concluded that new and infill development that would occur under the GPU would have a less than significant impact to existing utilities and service systems (City of Eureka, 2018b). Future development activities would be required to comply with applicable plans, policies, and guidelines that are designed

to protect utilities and service systems from potential negative impacts. Additional information about infrastructure and facilities that would serve the project are provided below:

Water System:

The GPU EIR concluded impacts related to the construction of new water infrastructure, or expansion of existing systems, would be less than significant due to the modest and broadly distributed growth proposed in the GPU, sufficient capacity of the water system, and with the implementation of GPU policies, including, but not limited to, those designed to protect and enhance utility service systems (Policies E-5.7, U-2.1, and U-2.2). The project would comply with all such applicable requirements and the project is consistent with the growth assumptions underlying the GPU EIR.

As discussed in the GPU EIR, though it is expected water demand in the City will increase; however, Humboldt Bay Municipal Water District (HBMWD) has adequate supply to support development that is projected to occur during the GPU, presently maintaining facilities sufficient to provide 17.9 million gallons of water per day (MGD) to domestic water customers. The City's average annual daily system demand is roughly 4.0 MGD. As such, the HBMWD has indicated that there is sufficient supply to service existing demand and accommodate new water demand at full build-out under the GPU (City of Eureka, 2018b). The project is consistent with the growth assumptions underlying the GPU EIR.

The project site is located in an existing urban area where water infrastructure is readily available. The new building proposed by the project would require a connection to the existing water lines adjacent to the site. The improvements for the water connections would occur onsite and within existing developed City right-of-way and, therefore, are not anticipated to result in significant environmental impacts. The potential impacts of infrastructure installation to serve the project has been addressed in other relevant sections of this document.

Therefore, with the implementation of GPU policies, capacity of the water system, and the projected modest and broadly distributed growth, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

Wastewater System:

As discussed in the GPU EIR, the City's wastewater treatment plant (WWTP) was designed and permitted to treat an average dry weather flow (ADWF) of 8.6 million gallons per day (MGD) and is currently reporting an ADWF of 3.6 MGD. As noted in the GPU EIR, the WWTP was designed so that its treatment capacity could be increased in the future to accommodate both the City's planned growth within its sphere of influence and Humboldt Community Services District's growth in the future (City of Eureka, 2018b). As such, the proposed project would not exceed the capacity of the WWTP and would not result in the need for the expansion or relocation of existing treatment facilities or the construction of a new treatment facility. As applicable, future expansion of the WWTP will be subject to CEQA and will be required to conduct its own project specific environmental analysis. The project will pay sewer connection and impact fees to pay its fair-share contribution to the wastewater collection and treatment system.

The project site is located in an existing urban area where wastewater infrastructure is readily available. The new building proposed by the project would require a connection to the existing wastewater lines adjacent to the site. The improvements for the wastewater connections would occur onsite and within existing developed City right-of-way and, therefore, are not anticipated to result in

significant environmental impacts. The potential impacts of infrastructure installation to serve the project has been addressed in other relevant sections of this document.

Therefore, with the implementation of GPU policies, capacity of the wastewater system, and the projected modest and broadly distributed growth, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

Storm Drainage System:

The GPU EIR concluded impacts related to the construction of new storm drainage systems or expansion of existing systems, would be less than significant due to the modest and broadly distributed growth proposed in the GPU and with the implementation of GPU policies and goals, including, but not limited to, those designed to protect and enhance utility and service systems (Policies U 3.1, U-3.2, and Goal U-3). The project would comply with all such applicable requirements and is consistent with the growth assumptions underlying the GPU EIR.

As described in the GPU EIR, future growth and development over the course of 20 years would potentially exceed the capacity of the storm drainage system in certain areas of the City, resulting in the construction of a new system or the expansion of the existing system; however, it would not result in substantial changes to the storm drain system, as changes are anticipated to be distributed broadly and incrementally across the 16.4-square-mile are of the City. Additionally, it has been identified that portion of the existing storm drain infrastructure is old and outdated, which may require refurbishment and upgrades in the future; however, infill development located within existing storm drain infrastructure would not require construction of new storm drain systems and any upgrades required are not due to the implementation of the GPU but from general wear and tear.

Approximately 53 percent of the project site is currently developed with impervious surfaces including buildings, surface parking, and walkways. Stormwater runoff at the project site either infiltrates into the ground onsite or flows to drainage inlets at the intersection of C and Clark Streets. As described elsewhere in this document, the project will be required to prepare a post-construction Stormwater Control Plan and incorporate low impact development site design measures and appropriate BMPs to minimize stormwater runoff and pollutants entering drainage facilities. Compliance with these existing regulatory standards would substantially reduce the potential for runoff from the site to exceed the capacity of the City's stormwater system. The required stormwater management features would be constructed onsite and, therefore, are not anticipated to result in significant environmental impacts. The potential impacts of infrastructure installation to serve the project has been addressed in other relevant sections of this document.

Therefore, with the implementation of GPU policies, capacity of the stormwater system, and the projected modest and broadly distributed growth, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

Energy Systems (electric power and natural gas):

The GPU EIR concluded impacts related to energy systems would be less than significant due to the modest and broadly distributed growth proposed in the GPU and with the implementation of GPU policies and goals, including, but not limited to, those designed to protect and enhance utility and service systems (Policies U 5.1 and U 5.9). As discussed in the GPU EIR, future growth and

development over the course of 20 years would potentially result in increase for energy and natural gas; however, it would not result in substantial changes to the energy supply or demand, as changes are anticipated to be gradual, intermittent, and widespread across the 16.4-square-mile area of the City (City of Eureka, 2018b). The project would comply with all such applicable requirements and is consistent with the growth assumptions underlying the GPU EIR.

The project site is located in an existing urban area where energy infrastructure is readily available. The new building proposed by the project would require a connection to the existing electrical and natural gas lines adjacent to the site. The improvements for these infrastructure connections would occur onsite and within existing developed City right-of-way and, therefore, are not anticipated to result in significant environmental impacts. The potential impacts of infrastructure installation to serve the project has been addressed in other relevant sections of this document.

Therefore, with the implementation of GPU policies and the projected modest and broadly distributed growth, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required

Telecommunication Systems:

The GPU EIR concluded impacts related to telecommunication systems would be less than significant due to the modest and broadly distributed growth proposed in the GPU and with the implementation of GPU policies and goals, including, but not limited to, those designed to protect and enhance utility and service systems (Policies U 5.1 and U 5.9). According to the GPU EIR, the availability of high-speed DSL, cable, and cellular phone service is widely available but can be limited the further one gets from the City center. Additional improvements or new infrastructure are generally constructed as the need arises to meet customer demand or as new projects are built; as such, these services would become available as development occurs outside of existing service areas.

The project site is located in an existing urban area where telecommunication infrastructure is readily available. The new building proposed by the project would require a connection to the existing telecommunication lines adjacent to the site. The improvements for the infrastructure connections would occur onsite and within existing developed City right-of-way and, therefore, are not anticipated to result in significant environmental impacts. The potential impacts of infrastructure installation to serve the project has been addressed in other relevant sections of this document.

Therefore, with the implementation of GPU policies and the projected modest and broadly distributed growth, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required

- b) *Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?*

The GPU EIR states that approximately 1,886 additional dwelling units are projected to be developed within the City during the GPU planning period, and it is expected that demand for expanded water service would increase with projected population and job growth. The GPU EIR concluded that new and infill development that would occur under the GPU would have a less than significant impact to existing water supplies, both in normal and multiple dry years due to the modest and broadly

distributed growth proposed in the GPU, sufficient capacity of the water system, and with the implementation of GPU policies, including, but not limited to, those designed to protect and enhance utility service systems (Policies E-5.7, U-2.1, and U-2.2). The project would comply with all such applicable requirements and the project is consistent with the growth assumptions underlying the GPU EIR.

As discussed in the GPU EIR, though it is expected water demand in the City will increase; however, Humboldt Bay Municipal Water District (HBMWD) has adequate supply to support development that is projected to occur during the GPU, presently maintaining facilities sufficient to provide 17.9 million gallons of water per day (MGD) to domestic water customers. The City's average annual daily system demand is roughly 4.0 MGD. As such, the HBMWD has indicated that there is sufficient supply to service existing and accommodate new water demand at full build-out under the GPU (City of Eureka, 2018b).

Therefore, with the implementation of GPU policies and the projected modest and broadly distributed growth, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required

- c) *Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

The GPU EIR concluded impacts to utilities and services systems would be less than significant due to the capacity of the wastewater system and with the implementation of GPU policies, including, but not limited to, those designed to protect and enhance utility service systems (Policies E-5.7, U-2.1, and U-2.2). The project would comply with all such applicable requirements. In addition, it is noted that the GPU EIR analyzed the impact of creating 1,886 additional housing units in the City, which is double the Regional Housing Needs Allocation (RHNA) of 952 units (City of Eureka, 2018b). The project is consistent with the growth assumptions underlying the GPU EIR.

As discussed in the GPU EIR, the project area is served by the City of Eureka sanitary sewer system which consists of an extensive collection and treatment system. According to the GPU EIR, the City's wastewater treatment plant (WWTP) was designed and permitted to treat an average dry weather flow (ADWF) of 8.6 million gallons per day (MGD) and is currently reporting an ADWF of 3.6 MGD. As noted in the GPU EIR, the WWTP was designed so that its treatment capacity could be increased in the future to accommodate both the City's planned growth within its sphere of influence and Humboldt Community Services District's growth in the future (City of Eureka, 2018b). As such, the proposed project would not exceed the capacity of the WWTP and would not result in the need for the expansion of existing treatment facilities. As applicable, future expansion of the WWTP will be subject to CEQA and will be required to conduct its own project specific environmental analysis.

Therefore, with the implementation of GPU policies and the projected modest and broadly distributed growth, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

- d) *Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*

The GPU EIR concluded that impacts related to insufficient solid waste disposal would be less than significant with the remaining capacity at the Dry Creek landfill facility and implementation of GPU policies including, but not limited to, those designed to protect and enhance utility service systems (Policies U-4.3 and U-4.5) (City of Eureka, 2018b). The project would comply with all such applicable GPU requirements.

As discussed in the GPU EIR, solid waste that cannot be recycled or composted is exported to the Dry Creek Landfill in White City, Oregon, which holds a Title V Operating permit. The Dry Creek Landfill accepts approximately 900 tons of solid waste per day and has an operational life expected to exceed 100 years (City of Eureka, 2018b). As such, the landfill that would serve the proposed project has adequate permitted capacity to accommodate the project's solid waste disposal needs. The project is consistent with the growth assumptions underlying the GPU EIR.

Therefore, based on existing landfill facility capacity and implementation of GPU policies, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

- e) *Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

The GPU EIR concluded impacts related to solid waste would be less than significant with existing landfill facility capacity, diversion programs, and implementation of GPU policies including, but not limited to, those designed to protect and enhance utility service systems (Policies U-4.3 and U-4.5) (City of Eureka, 2018b).

The project would deposit all solid waste at a permitted solid waste facility. As concluded in the GPU EIR, the City of Eureka will continue to comply with AB 939 and will continue to be monitored by the State of California CalRecycle agency (City of Eureka, 2018b). The project would comply with all such applicable requirements.

Therefore, based on the existing landfill facility capacity and implementation of diversion programs and GPU policies, the proposed project is consistent with the GPU, and would not result in any new or more severe impacts, including off-site and cumulative impacts, than those analyzed in the GPU EIR. Accordingly, no additional analysis or mitigation is required.

References

The following documents were used in the preparation of this document. The documents are available for review at the Eureka City Hall during regular business hours.

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Please use the link below to access Attachments:
<https://transfer.eurekaca.gov:5252/sharing/xHmhXn3IK>