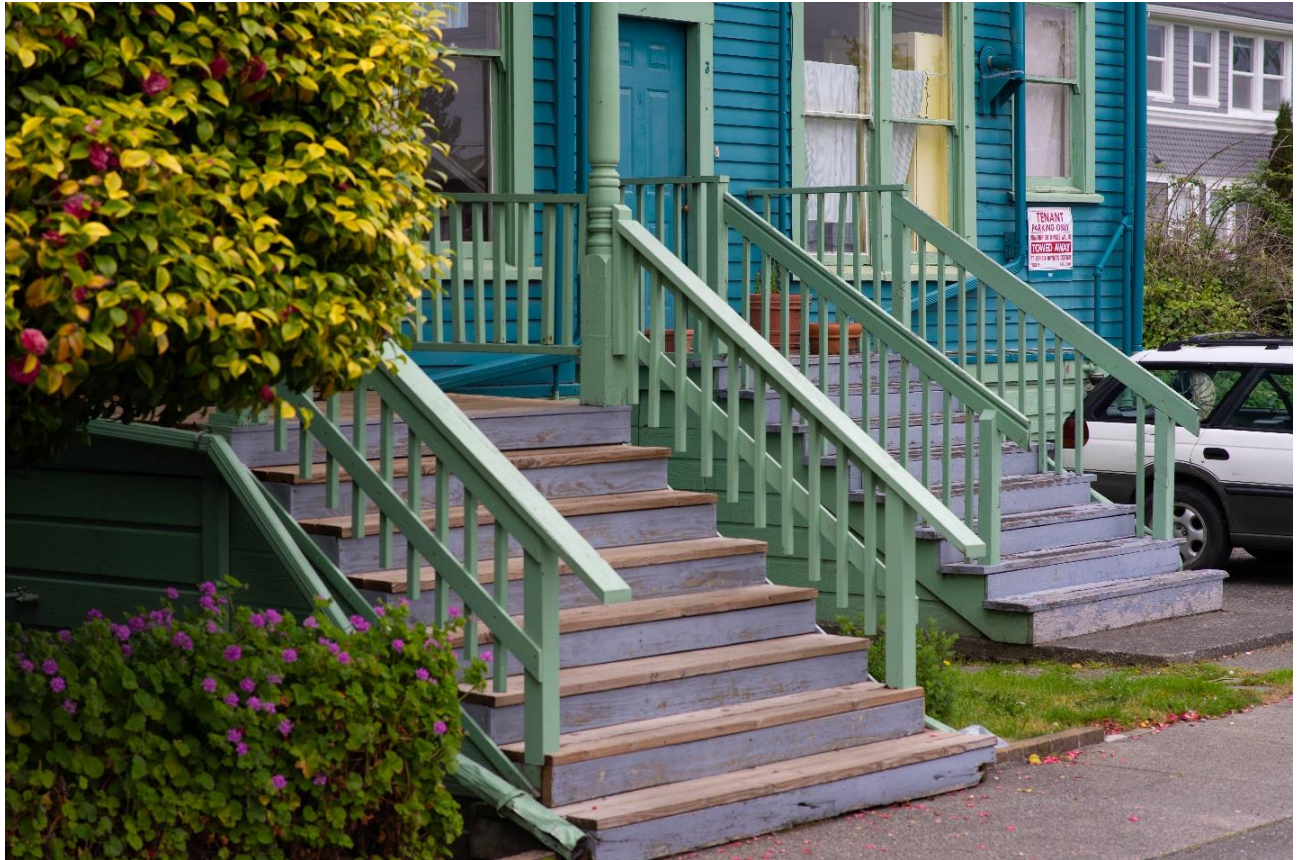


Housing



Introduction and Statutory Requirements

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. Section 65583 of the California Government Code establishes the required components for a Housing Element.

The Housing Element consists of the following four sections: (1) Statutory Requirements; (2) Context and Strategies; (3) Goals and Policies; and (4) Housing Programs. The Technical Background Report (bound separately) provides a detailed assessment of the City's existing and projected housing needs, constraints, and opportunities for addressing those needs, and an evaluation of the City's achievements under the prior Housing Element.





This 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 following objectives set forth in State law:

1. Identify adequate sites for a range of housing opportunities;
2. Assist in the development of adequate and affordable housing;
3. Address constraints to meeting the City's housing needs;
4. Conserve and improve the condition of housing; and
5. Promote housing opportunities for all persons

According to State planning law, the Housing Element must be consistent with other General Plan elements. While each of the elements is independent, the elements are also interrelated and complementary. Certain goals and policies of each element may also address issues that are primary subjects of other elements. This integration of issues throughout the General Plan creates a strong basis for the implementation of plans and programs and achievement of community goals. The Housing Element is most closely tied to the Land Use Element as residential development capacities established in the Land Use Element are incorporated into the Housing Element.

Bold Solutions

Context and Strategies

The City of Eureka is committed to taking whatever steps are necessary to address the housing needs of the community as well as to satisfy the requirements of State law. Yet, the City faces a significant challenge in the creation of housing: The City is largely built-out and there are relatively few sites that provide realistic opportunities for new development. Because of this challenge of limited development potential within city limits, the City has expended extraordinary effort to analyze the potential for annexation of undeveloped lands surrounding the City. The analysis was conducted by a consulting economist and land use specialist in 2017 as a component of the 2040 General Plan. The analysis definitively determined that annexation of surrounding lands for the purpose of stimulating new development was not a viable strategy due to unsurmountable geographic, ecological, and regulatory constraints. The geographic/ecological constraints include the waters of Humboldt Bay, coastal wetlands, and steep forested hillsides. Each of these constraints provide substantial physical and logistical challenges, but the most unsurmountable obstacle is that each of the geographic/ecological constraints come with regulatory barriers (such as the Coastal Act) that make development challenging. This puts Eureka in a unique position in the County of Humboldt. Most of the other nearby communities that are preparing housing elements have room to grow around their peripheries and many have room to grow internally.



Since annexation of new developable lands is not possible, and because the city is largely built-out with few developable sites remaining inside the city limits, Eureka needs a new set of realistic strategies designed to overcome these challenges and to stimulate the creation of new housing units across the economic and social spectrum of the city. Accordingly, this Housing Element represents a substantial evolution for Eureka. Through this document, the City of Eureka is committing to becoming a regional leader in developing realistic, effective, and innovative solutions to solving housing-related challenges and is committing to a series of proactive strategies that aim to address the needs of all socioeconomic segments of the community. These strategies acknowledge and embrace Eureka's unique position in Humboldt County as being one of the few places in which multi-story mixed-use development and dense infill is possible. These strategies also acknowledge and accept that Eureka is unlikely to create a significant number of new single-family residential units via conventional single-family developments, due to the City's largely built-out condition and geographic constraints.

The City cannot continue to adopt and implement post-WWII suburban housing strategies that rely on patterns of low-density sprawl. Such strategies simply cannot work in Eureka, even if the City desperately wanted them to. Yet, accepting these realities is relatively new for Eureka. Since the 1960s, the City's development regulations have favored low density, small buildings, segregation of uses, excessive parking spaces, large setbacks, large lots, and other development standards that hindered the development of housing. All of these constraints were adopted and promoted by the City despite the fact that the City's pre-WWII legacy development was based on a dense urban fabric with continuous city blocks and dense mixed-use multi-story buildings.

This Housing Element opens a new chapter for Eureka. Through considerable analysis and community engagement, 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 Subdivisions and Conservation Subdivisions
5. Geographically-Dispersed Affordable Housing Through Affordable-by-design Incentives and Local Density Bonuses

These strategies are the most realistic means of generating new housing in Eureka. The probability of a new 50-unit single-family residential subdivision in Eureka is low. However, as is demonstrated below, the



probability of a new 50-unit five-story mixed-use building is considerable. There is also a substantial chance that Eureka could see substantial growth in housing through the development of new ADUs and through internal conversions of existing buildings. The newly created allowances for small-lot subdivisions and conservation subdivisions also will stimulate new housing units that might not have otherwise existed. Finally, the City’s focused efforts to stimulate affordable housing geographically-dispersed throughout the City as a part of all multi-unit housing developments is a departure from the City’s previous strategy of producing affordable housing primarily through large individual projects. These strategies are each based on actual existing conditions in Eureka. They are the most realistic means of generating new housing in the City, and will lead to a substantial increase in the annual number of housing units constructed, as well as greatly improving the City’s ability to address the needs of all socioeconomic segments of the community. Each strategy is described in detail below.

Strategy 1: Maximize Development Potential of the Few Remaining Vacant and Underutilized Sites

This strategy aims to allow and promote full build-out of all remaining vacant and underutilized sites in the City, across all zone districts. While there are very few such parcels available, those that do exist should be developed at their maximum densities. For the City to promote such an outcome is consistent with the City’s historic legacy, but counter to the regulations and policies embraced by the City for the past 50 years.

With a population of around 27,000, Eureka is not a “big city.” However, Eureka is the largest incorporated city in a five-county region (Del Norte, Trinity, Humboldt, Mendocino, and Lake). That region constitutes substantially more land area than the states of Connecticut, Massachusetts, and Rhode Island combined. Eureka is the only city in that five-county region with buildings over three stories, which is likely the reason Eureka’s Downtown has the highest “job density” in the region, according to the US Census Bureau. Eureka is also home to the largest hospital in the region, the only commercial waterfront, the largest industrial waterfront, the largest concentration of lodging, and by far the largest continuous urban grid. In addition, while Eureka contains only 20 percent of Humboldt County’s overall population, the City generates approximately 50 percent of the County’s overall sales tax and is home to nearly half the jobs in the County. So, while Eureka is not a “big city,” it plays the role of “the big city” in the north coast region.

The historic development pattern of Eureka is based on the early establishment of an uninterrupted urban grid with 300-foot blocks and alleys that pass through the center of nearly every block. From the 1860s through the 1950s, the commercial downtown was densely developed with three to five-story buildings, and the residential areas were developed with a rich diversity of construction types, sizes, setbacks, and heights. The City



was forward thinking in the establishment of wide sidewalks that accompany nearly every street in the grid, creating a city that is very walkable, relative to many other similarly-size cities. While Caltrans's conversion of 4th and 5th Streets into Highway 101 severely diminished pedestrian connectivity between Downtown and the residential portion of the City, and while the industrial waterfront has experienced dramatic changes since its earliest days, the City's core grid and historic development patterns primarily remain intact.

In the 1960s the City adopted a strict proscriptive Euclidean zoning code, which became the most substantial obstacle to the construction of new high-quality development and for several decades was the primary source of deviations from the City's historic mixed-use development patterns. At the moment of its adoption, the 1960s code was out of alignment with the development in Eureka that already existed at the time and led to new development that was detrimentally-inconsistent with the City's previously-existing development pattern. It appears that the zoning code adopted in the 1960s was based on standards that were intended for suburban subdivisions, while Eureka was largely built-out at the time and needed a custom code specific to the unique conditions of Eureka. For instance, over 65 percent of Eureka's housing units were constructed prior to 1959 and the vast majority of the City's street network had been constructed by that time, which means that Eureka needed a zoning code that emphasized infill and development of vacant/underutilized properties.

Like most communities in California, Eureka is experiencing a shortage of housing at all income levels. Eureka is especially hard hit by this trend since the City is almost completely built-out and has little to no room for expanding the City's residential zone districts. According to the City's 2014-2019 Housing Element and recent housing projections associated with the City's General Plan Update, the maximum potential growth of new single-family residential homes built in conventional subdivisions is not likely to exceed a couple hundred at most. The City has conducted extensive analysis of opportunities for annexation and no meaningful opportunities for territorial expansion are viable. The City is surrounded by fully built-out residential subdivisions and coastal wetlands, which means that there is nowhere for the City to expand in order to create new housing. Accordingly, the City's recent analysis of vacant and underutilized parcels within City limits shows that the City's greatest opportunity for residential growth is through the construction of multi-story buildings in the Downtown and Old Town areas. Such development is envisioned to consist of multi-story buildings with retail on the ground floor and residential units on the upper floors.

In early 2019, the Eureka City Council rescinded the entire 1960-era zoning code and adopted an entirely new zoning code. The new code eliminated many regulations that held back the creation of housing, simplified many development procedures, and includes a substantial set of new development incentives. In particular, the recently adopted code



substantially advances opportunities for mixed-use residential development in commercial zones including multi-story buildings with upper floor residential units, especially near transit stops. Mixed-use residential developments have multiple advantages and can satisfy many of the goals and policies of the Housing Element. Residential units in dense multi-story buildings are likely to be smaller than other types of residential units, typically making them more affordable. Such development may also include a range of unit sizes, providing for a diverse mix of income levels in the same building. It is also possible for some or all of the units to be subdivided into condominium units, providing opportunities for owner-occupied housing and, in some cases, affordable owner-occupied housing. Mixed-use residential developments are also typically closer to amenities, such as transit stops, entertainment opportunities, grocery stores, and other basic needs. Such proximity can reduce or eliminate the need for vehicle ownership, thereby enhancing overall affordability. According to staff analysis, such developments are likely to constitute a substantial portion of the overall housing units developed in Eureka in the coming 20 years.

This strategy is not limited to mixed-use development. Dense residential complexes that contain no commercial uses are allowed (and will be promoted) in the City’s multi-family residential zones as well as in commercial zones.

Strategy 2: Accessory Dwelling Units

This strategy seeks to take advantage of the fact that over half of the City’s residential units are currently single-family homes on individual lots, the vast majority of which could contain a second (accessory) unit. The City of Eureka contains approximately 10,000 total parcels and approximately 6,000 single-family residential parcels, which means that a majority of the residential units in the City are in the single-family residential zone district. According to estimates based on utility data, only 5 percent of these single-family parcels already contain an ADU (also known as a mother-in-law unit, granny flat, etc.). Given these numbers, the creation of ADUs constitutes a substantial opportunity for the creation of housing in Eureka. If just 10 percent of these parcels created an ADU, 600 new housing units would be created and the City would see a six percent increase in total housing units, which is more than has been generated in Eureka in the past several decades. For context, the average number of new housing units created City-wide in Eureka over the past 10 years was approximately 12 units per year. If just one percent of single-family parcels developed a new ADU each year, then the City would have 60 new housing units per year which is five times more than what has been developed each year in Eureka for the past 10 years. Clearly, ADUs present one of the best opportunities for Eureka to create new housing units.



The State of California recently required all jurisdictions to allow ADUs in Residential zones. The City of Eureka has gone beyond State requirements and provides enhanced allowances for ADUs. The City is also engaged in an on-going effort to promote and encourage the development of ADUs through publicity campaigns and outreach.

Strategy 3: Internal Conversions

This strategy focuses on providing the regulatory flexibility to modify the interiors of existing structures in order to create new residential units. Eureka is rich in historic structures. Many of these structures contained residential units on upper floors that were converted to office uses. With the recent demand for new housing units, there is constant interest from owners of such buildings to convert upper floor office spaces back to residential units. Some of the historic structures in the City consist of large homes that have sufficient internal space to be converted into multiple residential units without any modifications to building exteriors. In other cases, some property owners seek to convert unused garages into residential units.

Such “internal conversions” and adaptive reuse of existing underutilized structures is among the least expensive and most commonly pursued paths to create housing in Eureka. Compared to new construction, development costs may be reduced because internal conversions can often take advantage of existing foundations, walls, and roofs. This type of development has the additional benefit of reducing neighborhood impacts because new buildings are not being constructed; in many instances, adjacent property owners are not aware that a conversion has occurred and that a new housing unit has been created.

Strategy 4: Small-Lot Subdivisions and Conservation Subdivisions

Similar to Strategy 1, this strategy focuses on embracing historic development patterns in Eureka that have been disallowed for the past several decades. Approximately 45 percent of all parcels in the City’s multi-family residential zone districts are less than 6,000 square feet. Yet, since the 1960s, the City has strictly enforced a minimum lot size of 6,000 square feet. Such a restriction has prevented what was formerly a common means of creating small lots and small residential structures. Known as “small lot subdivisions,” this strategy provides opportunities to create smaller-than-average developable lots (down to 2,000 square feet per lot) containing smaller-than-average single-family homes. Typically, this happens on lots that already contain residential structures. A typical example would be an existing small home (e.g. 1,200 square feet) on a standard City lot (e.g. 6,000 square feet). A portion of the lot (e.g. 3,000 square feet of the backyard) could be subdivided to provide a new buildable lot, which could then host a smaller (and therefore more affordable) 800-square-foot unit. Small Lot Subdivisions have a number of



advantages and can satisfy many of the goals and policies of the Housing Element. This regulatory option can generate housing units in places where property owners formerly never saw such an opportunity (such as a large and unused back yard). As a consequence, the number of residences (i.e. the actual residential density) can greatly increase in a neighborhood without a substantial alteration of the neighborhood fabric or demolition of existing structures. While ADUs are on the same lot as their respective primary units and therefore cannot be sold, Small Lot Subdivisions create legally separate lots, which means they can be individually sold. Small lots are inherently more affordable than larger lots and host smaller housing units, which are also inherently more affordable. Accordingly, Small Lot Subdivisions are among the best means of creating more owner-occupied affordable housing.

A similar tool that has not formerly been allowed in Eureka is “conservation subdivisions.” This option is valuable for parcels that have physical characteristics such as steep slopes and/or gulches that prevent or hinder traditional development. This regulatory option allows the owner of the property to preserve the unbuildable portions of the lot for conservation while shifting the development rights of the unbuildable portion to the buildable portion of the lot. The overall gross density of the parcel remains the same, but the net density of the buildable portion of the lot may be substantially higher than would otherwise be allowed.

Strategy 5: Geographically-Dispersed Affordable Housing through Affordable-by-Design Incentives and Local Density Bonuses

This strategy is complementary to the four strategies above and will be incorporated into each of them. The strategy is based on a commitment to promote and incentivize the creation of affordable housing in all future multi-unit residential developments in Eureka, regardless of location or zone district. The objective is for affordable housing to be geographically dispersed throughout the City. One way to do this is to incentivize the creation of Affordable-by-design housing units and/or deed restricted housing units in all future residential projects. For example, when a developer approaches the City with the interest of developing a 15-unit apartment complex, the City will encourage the developer to build 16 units, with two of the total units being small “Affordable-by-design” housing units.

In Eureka, “Affordable-by-design” housing consists of units that are less than 500 square feet and are not required to provide dedicated off-street parking spaces. These units are naturally affordable due to their small size, as opposed to being made affordable by the legal mechanism of a deed-restriction. This is because, based on standard rental rates in Eureka, units that are less than 500 square feet are typically affordable to low and moderately low-income households (i.e. the rent for such units is often less than 30 percent of the income of low-income households). For instance, the annual household income for a two-person very low income household



(31 to 50 percent MFI) in Humboldt County is \$24,000 per year, which means that rent at or below \$600 per month is affordable. The affordable monthly rent for a one-person low income household (51 to 80 percent MFI) is \$839. With an average rental rate of \$1 per square foot per month, a 500-square-foot unit is likely to be affordable to both a two-person very low income household and a 1-person low income household. Therefore, in Eureka, a small housing unit does not need to be deed restricted in order to be affordable.

Small units are typically most appropriate for one- and two-person households, which is a growing demographic sector in Eureka. Affordable-by-design developments can consist of rental or owner-occupied housing units and may be either attached (e.g. apartment building/condominiums) or detached (e.g. bungalow courts). Another advantage of small units is that they can lead to considerably more density. For example, an Affordable-by-design development on a 6,000-square-foot lot may have twelve 500-square-foot units instead of six 1,000-square-foot units.

Affordable-by-design units can take the form of ADUs, owner-occupied condominium units, upper-floor apartments in mixed-use development, multi-family rental apartments, townhomes, live/work units, tiny houses, efficiency dwelling units, micro-units, shared housing, and even single-family homes. In each of these cases, the City will provide incentives to developers for a portion of their units to be “Affordable-by-design” (i.e. 500 square feet or less). Because Affordable-by-design housing can be incorporated into such a diverse range of housing types, the probability of geographic distribution throughout the City is much higher than more traditional forms of affordable housing, which typically consist of single large projects that are complexes of entirely affordable housing.

Finally, 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.

Guide to Goals, Policies, and Programs

Like other Elements of the General Plan, the Housing Element contains a series of goals, policies, and implementation programs that articulate a direction for Eureka’s future. Goals express a desired end state, reflective of the community’s vision. Policies guide City decision-making and actions to support the stated goals. Implementation Programs identify specific activities or actions intended to carry out various policies.

The following pages contain the City’s seven housing goals (desired end states). Each goal is followed by related policies (decision-making guidance) that will direct the City toward the realization of the goals. While many of the policies will be enacted through a number of routine actions



and operations, each policy is followed by a parenthetical reference to specific Implementation Programs that will also enact the policies. The specific Implementation Programs are focused actions to implement individual policies or a series of related policies. Each specific Implementation Program includes identification of City departments responsible for implementation, as well as an implementation timeline. While a date range is provided for each implementation program, the actual timing of each implementation program will be determined by the City based upon the availability of funding and prioritization of resources. The Housing Element is intended to be pragmatic, while at the same time inspiring the community to reach above and beyond. Goals, policies, and implementation programs will be carried out to the extent that resources are present to do so.

The following graphic provides a visual guide to the meaning and relationship of the Goals, Policies, and Programs.



Goal Numbering.

Each goal number starts with the element acronym and is followed by the number of the goal (e.g. LU-1 means Land Use Element, first goal)

City of Eureka 2040 General Plan

Land Use

Community Form and Character

GOAL LU-1


A Community that values its unique small town charm and livability while thoughtfully advancing new prospects for growth and economic vitality (New)


LU-1.1 Diverse Uses. Maintain a diverse range of compatible land uses that offer adequate flexibility to quickly respond to evolving market opportunities over time. (RDR)

LU-1.2 Compact Form. Provide for a compact pattern of land use at densities/intensities higher than traditional in Eureka to make efficient use of the City's limited remaining developable lands, promote walkability, and avoid sprawl. (RDR)

LU-1.3 Beneficial Development. Support development that affords benefits to the community including that which:

- a. Offers varied housing choices.
- b. Provides for mixed use development.
- c. Reuses underutilized or dilapidated buildings.
- d. Furthers the attraction and/or retention of businesses as targeted in the Eureka Economic Development Strategic Plan.
- e. Enhances the City's tax base.
- f. Encourages people to walk, bike or use transit.
- g. Integrates public use open space.
- h. Preserves and/or enhances valuable natural, historic or cultural resources.
- i. Applies practices that help to reduce development's carbon footprint.
- j. Advances other City goals. (RDR, NP)





Goal.

A goal expresses a desired end state reflective of the community's vision. Each goal has one or more policies associated with the goal.

Policy Title.

Each policy contains a leading title in bold for quick reference to the policy.

Policy.

A policy guides City decision-making and actions to support the stated goals to be carried out by implementation measures. Each policy is associated with a specific goal.

Implementation.

References a standard implementation tool or a specific program that implements the policy. Implementation tools and specific implementation programs are discussed at the end of the element or in the Implementation Chapter of this General Plan.

Page Number.

Policy Number.

Continuing from the goal numbering, the policy number is shown as the last number, supporting the goal that it follows (e.g., Policy LU-1.3 means Land Use Element, first goal, third policy)



Create Affordable and Market Rate Housing

GOAL H-1

Eureka’s development regulations, permit processing procedures, and customer service standards are development-friendly and conducive to the production of housing.

- H-1.1 Flexible and Accommodating Regulations.** Regularly evaluate and modify City development-related regulations, standards, and residential density maximums to allow for a diverse range of housing options. Actively strive to eliminate unnecessary and burdensome government regulations that restrain or impede the development of housing. (RDR) (Implemented by: Imp H-1; Imp H-2; Imp H-3; Imp H-5) (See also: LU-1.6, LU-1.8 and LU-6.3)
- H-1.2 Customer Service Standards.** Regularly assess and update the City’s development review processes, permitting procedures, and customer service standards in pursuit of maximum efficiency, effectiveness, and timeliness. Actively strive to eliminate unnecessary and burdensome government procedures and processes that restrain or impede the development of housing. (RDR) (Implemented by: Imp H-5)
- H-1.3 Public Improvement Requirements.** Regularly evaluate and modify the City’s “Public Improvement Requirements” (PIRs) to optimize the balance between funding public facilities and stimulating the creation of housing units. Ensure that PIR triggers reflect current and realistic construction cost considerations. Adopt modern best practices employed by other communities. (RDR, OFB) (Implemented by: Imp H-6)
- H-1.4 Permitting Fees.** Periodically review City permitting, impact, and utility connection fees to ensure the fees do not unduly constrain housing development, while balancing the need to use fees in order to finance staffing and necessary public improvements. (RDR, OFB) (Implemented by: Imp H-4)
- H-1.5 Reduced Fees for Affordable Housing.** Consider permit fee and utility connection fee reductions for developments that meet the affordable and special housing needs of the



- community. (RDR, OFB) (Implemented by: Imp H-4; Imp H-16; Imp H-18)
- H-1.6 Pre-permitting Options.** Explore pre-permitting options that would provide accelerated and/or alternative means of acquiring necessary permits for the creation of new housing units. (RDR) (Implemented by: Imp H-9; Imp H-12) (See also: LU-6.3)
- H-1.7 Parking Standards and Parking Management.** In Mixed-Use and Multi-Family Residential zones, continue to provide regulatory options in which the number of required parking spaces for housing development can be reduced or eliminated to incentivize the creation of denser-than-average housing development. Regularly review and modify development standards related to the required amount of parking for the development of new housing, as well as the management of on-street parking. Seek to optimize the balance between parking supply, parking management, and the creation of new housing units. Default on the side of prioritizing the creation of new housing units over the creation of parking spaces. (RDR) (Implemented by: Imp H-3; Imp H-7; H-10) (See also: LU-1-10)
- H-1.8 Transit Passes.** In Mixed-Use and Multi-Family Residential zones, continue to provide regulatory options in which required parking spaces for residential units can be waived for developments that provide perpetual transit passes for tenants. Encourage developers to provide transit passes to reduce the cost of housing development, as well as generate denser-than-average housing development, thereby leading to more housing. (RDR, PI) (Implemented by: Imp H-2; Imp H-7)
- H-1.9 Bike Parking.** Continue to provide regulatory options in Mixed-Use and Multi-Family Residential zones that waive required parking spaces for residential units, in exchange for on-site bicycle parking. Encourage developers to provide bike parking to reduce the cost of housing development as well as to generate denser-than-average housing development, thereby leading to more housing. (RDR) (Implemented by: Imp H-2; Imp H-3; Imp H-7; Imp H-10) (See also: M-3.8 and M-3.9)
- H-1.10 Building Heights and Floor Area Ratios.** Allow multi-story buildings in Mixed Use zones with building heights and floor area ratios in excess of existing buildings in order to promote dense upper-floor residential and mixed-use developments.



(RDR) (Implemented by: Imp H-1; Imp H-2; Imp H-3; Imp H-5)
(See also: LU-6.1)

H-1.11 Development Standards. In residential zones, continue to allow setbacks that are close-to-the-street, generous maximum site coverage allowances, and sufficient floor area ratios to incentivize the development of residential units while honoring the look and feel of Eureka’s legacy residential neighborhoods. (RDR) (Implemented by: Imp H-1; Imp H-2; Imp H-3; Imp H-5) (See also: LU-1.11)

H-1.12 Diverse Housing Development Options. Continue to provide a diverse range of housing development options beyond typical single-family and multi-family developments, such as: small lot subdivisions, conservation subdivisions, internal conversions, adaptive reuse, mixed-use development, tiny houses, efficiency dwelling units, micro-units, and shared housing. As novel methods of providing additional housing are developed, evaluate their feasibility and consistency. (RDR) (Implemented by: Imp H-1; Imp H-3; Imp H-7; Imp H-13; Imp H-14; Imp H-15) (See also: LU-1.1 and LU-5.1)

H-1.13 Tiny Houses. Continue to allow regulatory options for tiny houses to count as residential units, as long as the units comply with the California Building Standards Code. (RDR) (Implemented by: Imp H-1; Imp H-13; Imp H-14)

H-1.14 Tiny Houses on Wheels. Explore the creation of regulatory options that would allow tiny houses on wheels (classified as recreational vehicles) to be considered residential units, as long as the vehicles comply with the California Vehicle Code. Develop design standards for Tiny Houses on Wheels wherever they are allowed to serve as residential units. (RDR) (Implemented by: Imp H-1; Imp H-14)

H-1.15 Deed-Restricted Affordable Housing Incentives. Continue to provide local regulatory incentives (beyond those provided via State density bonus law) for deed-restricted affordable housing. Explore adding additional local regulatory incentives. (RDR) (Implemented by: Imp H-1; Imp H-3; Imp H-7; Imp H-16; Imp H-18)

H-1.16 Affordable-by-Design Incentives. Continue to provide local regulatory incentives for Affordable-by-design housing, in which incentives are provided to:

- a) Build housing units that are smaller than 500 square feet;
- b) . Be less expensive to develop;



- c) Generate denser-than-average housing developments;
- d) Lead to an overall increase in total housing units as well as more units that are inherently affordable without being deed restricted.

Explore adding additional local regulatory incentives. (RDR) (Implemented by: Imp H-1; Imp H-3, Imp H-7, Imp H-11, Imp H-12, Imp H-27)

H-1.17 Development Agreements. Encourage affordable housing creation through the use of development agreements that provide incentives to developers in exchange for the provision of affordable housing. (RDR) (Implemented by: Imp H-1; Imp H-2; Imp H-3; Imp H-7) (See also: E-8.8)

H-1.18 Expedite Permit Reviews For Affordable Housing Projects. Consider procedures that expedite permit reviews for affordable housing projects. Actively support developers of affordable housing projects by offering assistance in locating suitable sites, assistance with preliminary concept development, multi-department pre-application meetings, and grant-writing support. (RDR) (Implemented by: Imp H-1; Imp H-5; H-16; H-18)

H-1.19 Upzoning. Where feasible and consistent with the objectives of the General Plan, support requests by property owners to “upzone” their property to land use and zone classifications that allow for an increase in residential density, particularly where such properties are on or near the edges of zone districts with higher densities. (RDR) (Implemented by: Imp H-1; Imp H-2; Imp H-3)

H-1.20 Local Coastal Plan. Actively pursue Coastal Commission certification of a substantially reformed City of Eureka Local Coastal Program that allows the types of regulations and development options that support and promote the creation of housing, including those housing-friendly regulatory options already allowed by the City outside of the Coastal Zone. (RDR, IGC) (Implemented by: Imp H-1; Imp H-2; Imp H-3)

H-1.21 Illegal Unit Amnesty. Encourage property owners to declare illegal dwelling units and to bring such units into conformance with applicable building and housing codes. Explore the creation of an Unpermitted Unit Amnesty Program (RDR, PI) (Implemented by: Imp H-1; Imp H-2; Imp H-3; Imp H-5; Imp H-12; Imp H-20)



GOAL H-2

The City government actively facilitates the creation of a range of new affordable and market rate housing units to accommodate future growth and to address the needs of all socioeconomic segments of the community.

- H-2.1 Facilitate Diverse Options.** Facilitate the development of a diverse range of housing options including, but not limited to: single-family homes, Accessory Dwelling Units (ADUs), multi-family rental housing, condominiums, townhomes, live/work units, housing in mixed-use developments, dense multi-story developments, tiny houses, efficiency dwelling units, micro-units, shared housing, owner-occupied affordable housing, and other housing types. (RDR) (Implemented by: Imp H-1; Imp H-2; Imp H-3; Imp H-4; Imp H-5; Imp H-6; Imp H-7; Imp H-8; Imp H-9) (See also: LU-1.3)
- H-2.2 Complementary Partnership with Nearby Jurisdictions.** Acknowledge, embrace, and promote Eureka’s unique position in Humboldt County as being one of the few places in which multi-story, mixed-use development and dense infill is possible. Also acknowledge and accept that Eureka is unlikely to create a significant number of new single-family residential units due to the City’s largely built-out condition and geographic constraints. With these facts acknowledged, work with neighboring jurisdictions to allow types of housing in Eureka that are unlikely to be produced in other communities. Allow Eureka’s future housing developments to serve as a symbiotic complement to the mostly single-family developments that are likely to occur in the nearby incorporated communities and in the unincorporated areas around Eureka. (IGC) (Implemented by: Imp H-1; Imp H-2; Imp H-3; Imp H-7; Imp H-8; Imp H-9; Imp H-10; Imp H-11; Imp H-12; Imp H-13; Imp H-14; Imp H-15; Imp H-19; Imp H-27; Imp H-28) (See also: LU-6.7)
- H-2.3 Site Inventory.** Analyze all parcels in the City and then create/maintain an inventory of all parcels that contain the potential of hosting new housing units. (Implemented by: Imp H-7; Imp H-8; Imp H-11) (See also: E-3.2)
- H-2.4 Maximum Density Infill.** Promote and encourage the development of the last remaining vacant lots in the City with housing units at the highest density allowed in each respective zone district. (JP, IGC, PI) (Implemented by: Imp H-7; Imp H-8; Imp H-11) (See also: LU-6.2)



- H-2.5 Recruitment of High-priority Sites.** Identify high priority sites that have the highest potential of hosting the types of housing most needed in the city and/or the sites that have the best potential of hosting the greatest number of units. For each high priority site, actively recruit the owners to build or sell. (JP, IGC, PI) (Implemented by: Imp H-7; Imp H-8; Imp H-11) (See also: E-3.2)
- H-2.6 Promotional Materials.** Develop educational and promotional materials for property owners and prospective developers. Design the materials to promote the various housing-friendly regulatory development standards and incentives available in Eureka. Share the materials with the objective of stimulating the creation of all ranges, types, and densities of housing. (PI) (Implemented by: Imp H-7)
- H-2.7 Land Suitable for Housing.** Provide as-needed assistance to non-profits, real estate professionals, design professionals, contractors, and other development specialists to identify land suitable for, and appropriately-zoned for, any form of housing development. (RDR, PI) (Implemented by: Imp H-7; Imp H-8; Imp H-9; Imp H-11) (See also: E-3.2)
- H-2.8 Mixed-Use Residential.** Promote and encourage the development of new residential units in mixed-use zones, with particular emphasis on multi-story buildings, upper floor residential units, and residential units near transit stops. (RDR, PI) (Implemented by: Imp H-1; Imp H-2; Imp H-3) (See also: LU-1.3, LU-2.1, and LU-3.4)
- H-2.9 Small Lot Subdivisions.** Promote and encourage small lot subdivisions as:
- a) An opportunity to develop residential units on already-developed sites;
 - b) A way for property owners to subdivide a portion of a property while retaining and preserving existing structures;
 - c) A process with high probability of creating owner-occupied, Affordable-by-design housing units, with lower-than-average purchase prices;
 - d) A means of increasing the actual (as opposed to the maximum allowed) housing density in Multi-Family Residential zone districts. (RDR, PI) (Implemented by: Imp H-1; Imp H-2; Imp H-3; Imp H-7; Imp H-9; Imp H-11)
- H-2.10 Accessory Dwelling Units.** Promote and encourage the creation of Accessory Dwelling Units (ADUs) as:



- a) An opportunity for property owners to create a source of rental income on their property;
- b) A means to develop residential units on already-developed sites;
- c) A way for a property owner to build a new residential unit while retaining and preserving existing structure(s);
- d) A vehicle for creating smaller-than-average (and thereby “Affordable-by-design”) housing units; and
- e) A means of increasing the actual (as opposed to the maximum allowed) housing density in Single-Family Residential zone districts. (RDR, PI) (Implemented by: Imp H-1; Imp H-2; Imp H-3; Imp H-6; Imp H-7; Imp H-9; Imp H-12) (See also: LU-5.5)

H-2.11 Conservation Subdivisions. Promote and encourage conservation subdivisions as:

- a) An opportunity to improve difficult-to-develop sites, where steep slopes and gulches prevent or limit development;
- b) A means to transfer the development rights of unbuildable areas to the limited buildable areas; and
- c) Preserve unbuildable areas for conservation. (RDR, JP, PI) (Implemented by: Imp H-1; Imp H-2; Imp H-3; Imp H-7; Imp H-9; Imp H-11)

H-2.12 Internal Conversions and Adaptive Reuse. Promote and encourage the conversion of unused or under-utilized non-residential spaces in existing buildings, to residential uses. (RDR, JP, PI) (Implemented by: Imp H-1; Imp H-2; Imp H-3; Imp H-7; Imp H-11)

H-2.13 Density Bonus Laws. Promote and encourage the utilization of State and local density bonus laws, which provide development incentives (including increased residential density) in exchange for the creation of affordable housing. (RDR, PI) (Implemented by: Imp H-1; Imp H-2; Imp H-3; Imp H-7; Imp H-9; Imp H-16; Imp H-18)

H-2.14 Motel Conversions to Affordable Housing. Promote and encourage the conversion of under-utilized and/or under-performing motels into affordable housing. Encourage motels with chronic code enforcement violations to sell to affordable housing developers. (RDR, IGC, JP, PI) (Implemented by: Imp H-1; Imp H-15)



- H-2.15** **Mixed-income Housing.** Encourage the development of mixed-income housing that includes various household compositions to accommodate a range of ages and family types. (RDR) (Implemented by: Imp H-1; Imp H-2; Imp H-3)
- H-2.16** **Support Non-profits.** Support the development of affordable housing by non-profit organizations through assistance with grants, consultation regarding concept development, and facilitation of multi-department pre-application meetings. (IGC, JP, PI) (Implemented by: Imp H-8; Imp H-16; Imp H-18; Imp H-27)
- H-2.17** **Housing Units on Church Property.** Encourage churches to build residential units on unused or under-utilized church property. Allow churches to sacrifice parking spaces to construct “tiny houses”. (PI) (Implemented by: Imp H-1; Imp H-14 Imp H-27)
- H-2.18** **Grants for Housing.** Actively monitor State and Federal grant/loan programs directed at the construction and/or rehabilitation of housing. Pursue grants that satisfy other goals/policies. (IGC, JP) (Implemented by: Imp H-16; Imp H-17; Imp H-18; Imp H-21; Imp H-25; Imp H-27; Imp H-29)
- H-2.19** **Public Private Partnerships.** Explore public private partnerships where such arrangements are favorable to the creation of housing and that satisfy other goals/policies. (JP, PI) (Implemented by: Imp H-16; Imp H-17; Imp H-18; Imp H-21; Imp H-25; Imp H-27; Imp H-29)
- H-2.20** **Transit Services.** Support the enhancement and expansion of intra-city and regional transit services that complement the development of mixed-use and affordable housing. (IGC, JP) (Implemented by: Imp H-1; Imp H-10) (See also: M-4.1)
- H-2.21** **Day Care.** Support the development of day care facilities, which complement the development of housing. (JP, PI) (Implemented by: Imp H-1; Imp H-2; Imp H-3)
- H-2.22** **Shared Housing.** Continue to support and actively market shared housing as an affordable housing option, especially for seniors and people with special needs. (IGC, JP, PI) (Implemented by: Imp H-1; Imp H-2; Imp H-3; Imp H-18; Imp H-27)



GOAL H-3

Owner-occupied affordable housing is among the mix of housing types created in Eureka.

- H-3.1 Affordable by Design.** Promote and encourage a range of Affordable-by-design residential units across all zone districts where residential development is allowed. Promote the fact that Affordable-by-design developments can be either rental units or owner-occupied units in both attached (e.g. apartment building/condominiums) or detached configurations (e.g. bungalow courts). (RDR, PI) (Implemented by: Imp H-1; Imp H-3, Imp H-7, Imp H-11, Imp H-12, Imp H-27)
- H-3.2 Condominium Options.** In multi-family and mixed-use zones, allow regulatory options for the subdivision of individual units that can be individually sold, especially smaller-than-average units. (RDR) (Implemented by: Imp H-1; Imp H-2; Imp H-7)
- H-3.3 Small Lot Subdivisions.** Promote and encourage small lot subdivisions as a vehicle for creating smaller-than-average lots and smaller-than-average housing units. Encourage owners of such lots to sell instead of leasing. (RDR, PI) (Implemented by: Imp H-1; Imp H-2; Imp H-3; Imp H-7; Imp H-9; Imp H-11; Imp H-27)
- H-3.4 Homeownership and Rehab Assistance Programs.** Monitor State and Federal grant/loan programs associated with homebuyer and owner-occupied rehabilitation assistance. Seek to acquire grants/loans when the terms of such programs are viable in Eureka. (IGC, JP, PI) (Implemented by: Imp H1; Imp H-7; Imp H-17; Imp H-18; Imp H-25)
- H-3.5 Homeownership Education and Outreach.** Increase homeownership through education, outreach, and partnerships with non-profit organizations. (JP, PI) (Implemented by: Imp H1; Imp H-7; Imp H-17; Imp H-18; Imp H-25; Imp H-30)



Preserve and Improve Affordable and Market Rate Housing

GOAL H-4

All neighborhoods are clean and safe, while all levels and types of housing units throughout Eureka are consistently maintained at a high level of quality and integrity.

- H-4.1 Energy Efficiency.** Encourage cost-effective, energy-efficient upgrades to housing, including the use of passive systems, to decrease energy use. (PI) (Implemented by: Imp H-1; Imp H-23) (See also: U-5.1 through U-5.5)
- H-4.2 Enhance Existing Neighborhoods.** Ensure that new developments enhance existing neighborhoods by:
- a) Encouraging developers to provide street planting, landscaping, lighting, underground utilities, and other privately-funded community amenities as part of any subdivision or development project;
 - b) Continuing to require aesthetic design standards for fences, landscaping, and parking lots for all residential development; and
 - c) Continuing to implement and enforce design review criteria that encourage high quality standards of design and materials in all multi-family residential developments. (RDR, JP, PI) (Implemented by: Imp H-1; Imp H-2; Imp H-3; Imp H-7) (See also: LU-1.3, IU-1.12 through LU-1.21, LU-5.5, LU-5.7 and LU-5.8)
- H-4.3 Condition of Housing.** Support all organizations, activities, and community-driven programs focused on improving the condition of housing. Encourage citizen involvement in property maintenance and efforts to improve the housing stock and overall neighborhood quality. (IGC, JP, PI) (Implemented by: Imp H-1; Imp H-20; Imp H-21) (See also: CS-2.6)
- H-4.4 Awareness of Importance of Maintenance.** Promote increased awareness among property owners and residents, of the importance of property maintenance to long-term housing quality. (JP, PI) (Implemented by: Imp H-20; Imp H-21; Imp H-25)



- H-4.5 Maintenance Assistance Programs.** Pursue State/Federal funds to assist low-income owners of housing units with rehabilitation and reduction of operational costs. Support non-profit organizations that provide related assistance. Where feasible, assist landlords and other property owners in maintaining and improving their properties through State-funded residential rehabilitation assistance programs, the Mills Act, and other innovative mechanisms that do not rely on City-funded subsidies. Prioritize dwelling units owned or occupied by seniors, low-income individuals/households, and special needs individuals. (IGC, JP, PI) (Implemented by: Imp H-25)
- H-4.6 On-Site Management.** Promote strong, on-site management of apartment complexes to ensure the maintenance of housing and neighborhood quality. (JP, PI) (Implemented by: Imp H-18; Imp H-30)
- H-4.7 Code Enforcement.** Continue to utilize the City’s code enforcement program to bring substandard units into compliance with City codes and to improve overall housing conditions. Where appropriate, pursue nuisance abatement and the elimination of overcrowded, unsafe, and unsanitary conditions within residential neighborhoods. (RDR, OFB) (Implemented by: Imp H-20) (See also: CS-2.6)
- H-4.8 Public Health and Safety.** Continue to support healthy neighborhoods by addressing public health and safety issues through cooperative partnerships between neighborhood associations, non-profits, Code Enforcement, the Eureka Police Department, Humboldt Bay Fire, Humboldt County Health and Human Services, Humboldt County Health Department, and other public agencies. (RDR, IGC, JP, PI) (Implemented by: Imp H-20; Imp H-21) (See also: HS-5.1 through HS-5.5)
- H-4.9 Property Inspections.** Continue to work with Humboldt Bay Fire to perform ongoing property inspections of multi-family residential developments of 3 or more units. (JP) (Implemented by: Imp H-20; Imp H-21) (See also: CS-2.6)

GOAL H-5

Existing affordable housing units are retained and preserved, while displacement from housing is minimized.



- H-5.1 Vacation Rentals.** Balance the need for housing with the market for residential lodging by evaluating the impact of the number of full-unit rentals on residential availability. Consider establishing and maintaining a cap on the number of full unit vacation rentals in residential zone districts. (RDR) (Implemented by: Imp H-22)
- H-5.2 Accessible Units.** Encourage the development of residential units that are accessible to handicapped persons or are adaptable for conversion to housing for handicapped persons. (RDR, JP, PI) (Implemented by: Imp H-16; Imp H-18)
- H-5.3 Retention of Affordable Rental Housing.** Support the retention of existing affordable rental housing, where feasible and encourage the replacement of lost units. (IGC, JP, PI) (Implemented by: Imp H-16; Imp H-18; Imp H-25; Imp H-26)
- H-5.4 Long-Term Vacancies.** Reduce resident displacement and reductions in housing stock from long-term vacancies. (Implemented by: Imp H-26)
- H-5.5 Loss by Neglect.** Support proactive measures to prevent the loss of low-income housing by neglect. (PI) (Implemented by: Imp H-20; Imp H-21; Imp H-26)
- H-5.6 Displacement of Existing Residents.** Work to prevent or minimize displacement of existing residents. (Implemented by: Imp H-20; Imp H-21; Imp H-23; Imp H-25)
- H-5.7 Replacement of Multi-Family Housing.** Encourage the replacement of multi-family housing that is demolished with housing that is affordable to a wide spectrum of households. (JP, PI) (Implemented by: Imp H-16; Imp H-18; Imp H-29; Imp H-32)
- H-5.8 At-risk Affordable Housing Units.** Preserve “at-risk” affordable units through monitoring, working with potential nonprofit purchasers/managers, and exploring funding sources available to preserve at-risk units. (IGC, JP, PI) (Implemented by: Imp H-20; Imp H-21; Imp H-23; Imp H-25)



Promote Equal Access to Housing for All

GOAL H-6

All residents of Eureka have equal access to housing options.

- H-6.1 Safe and Stable Housing.** Work towards safe and stable housing for all members of the community. (RDR, IGC, JP, PI) (Implemented by: Imp H-15; Imp H-16; Imp H-17; Imp H-18; Imp H-20; Imp H-21; Imp H-23; Imp H-28; Imp H-29; Imp H-30; Imp H-31; Imp H-32) (See also: HS-5.5 and HS-5.6)
- H-6.2 Prohibit Discrimination.** Continue to support the prohibition of discrimination in the sale or rental of housing with regard to race, color, religion, age, sex, familial status, marital status, disability/medical conditions, national origin, citizenship, status as a student, source of income, political affiliation, gender identity, or sexual orientation. (PI) (Implemented by: Imp H-15; Imp H-16; Imp H-17; Imp H-18; Imp H-20; Imp H-28; Imp H-29; Imp H-30; Imp H-31; Imp H-32)
- H-6.3 Non-Profit Service Providers.** Support non-profit service providers that help meet the diverse housing and supportive service needs of the community. (IGC, JP, PI) (Implemented by: Imp H-15; Imp H-16; Imp H-17; Imp H-18; Imp H-20; Imp H-21; Imp H-23; Imp H-28; Imp H-29; Imp H-30; Imp H-31; Imp H-32)
- H-6.4 Fair Housing Choices.** Continue to further fair housing choices by actively expanding housing opportunities and removing impediments to fair housing. (RDR, PI) (Implemented by: Imp H-15 through H-18, Imp H-20 and Imp H-21; Imp H-23; Imp H-28 through Imp H-32) (See also: LU-1.3 and LU-5.1 through LU-5.8)
- H-6.5 Pedestrian and Bicycle Connectivity.** Ensure that projects integrate safe pedestrian and/or bike connectivity to existing or proposed destinations such as employment, shopping, business, and other residential developments, to reduce vehicle miles traveled, promote alternative modes of transportation, and ensure pedestrian and bicycle safety. (RDR, IGC, JP, PI) (See also: M-3.7 through M-3.12)
- H-6.6 Transit Services.** Support regional efforts to enhance and expand transit services. (IGC, JP, PI) (See also: M-4.1)



H-6.7 Rental Subsidies and Assistance. Continue to provide funding for rental subsidies and support County, State, and Federal rental subsidy and rental assistance programs, such as Housing Choice Vouchers. (IGC, JP, PI) (Implemented by: H-25)

H-6.8 Housing First. Continue to implement Housing First programs. (Implemented by H-27)

GOAL H-7

The rate of homelessness in Eureka is substantially lower than it has been in the past.

H-7.1 Homelessness Strategy. Develop a new Eureka Homelessness Strategic Plan. (MP, IGC, JP, PI) (Implemented by: H-27)

H-7.2 End Homelessness. Seek to end homelessness in Eureka through support for, and participation in, multiple strategies, including housing-first principles, Substance Use Disorder programs, counseling and support services, income assistance programs, job training/counseling services, and other proven methods of reducing the incidence and effects of homelessness. Support non-profit organizations and public agencies with a proven track record of accomplishing these sorts of strategies, principals, programs, and services. (IGC, JP, PI) (Implemented by: H-27) (See also HS-5.4 through HS-5.6)

H-7.3 Balanced Distribution of Resources County-wide. Work with the various branches of the Humboldt County government, as well as the six other incorporated cities in the County, to advocate for a balanced distribution of low income and homelessness resources and projects throughout the County and discourage the overconcentration of resources, projects, and solutions in Eureka. (IGC, MP, JP) (Implemented by: Imp H-28) (See also: LU-2.8 and HS-5.7)

H-7.4 Landlord Recruitment. Recruit property owners, property managers, and landlords to offer housing to homeless individuals and families, at standard or reduced rates. Work with non-profit organizations and the Humboldt County Department of Health and Human Services to provide rental subsidies, rental assistance, and guarantees. (IGC, JP, PI)



H-7.5 Referrals through Mobile Outreach. Maintain partnerships between the City of Eureka Community Services programs, Eureka Police Department, and Humboldt County Department of Health and Human Services to engage in mobile outreach to homeless individuals. When appropriate and feasible, make housing referrals and service referrals during mobile engagements. (IGC, JP, PI) (Imp H-27 and H-28) (See also: HS-5.5 through HS-5.7)

Summary of Quantified Objectives (Regional Housing Needs Allocation)

The following table summarizes the City’s quantified objectives for the period of 2019-2027. All objectives to be realized via the actions contained in the Implementation Programs:

Income	New Construction	Rehabilitation	Conservation/ Preservation
Extremely Low	116	67	90
Very Low	115	38	90
Low	147	50	
Moderate	172	95	
Above Moderate	402		
Total	952	250	180

Implementation

IMP H-1: Annual Evaluation of Implementation Programs and Annual Housing Production Report

The City of Eureka Housing Element is effectively a strategic plan to generate the types and quantities of housing needed to accommodate future growth and to address the needs of all socioeconomic segments of the community. The Implementation Programs herein represent the City’s intended efforts to stimulate such housing development. Regular evaluation of these Programs and the City’s efforts to stimulate the creation of housing is necessary in order to ensure that the City is engaged in the most efficient and effective activities to accomplish the goals of this plan. Accordingly, the City will engage in an annual review of this Housing Element and the Implementation Programs to evaluate their effectiveness and to adjust as needed. A part of this evaluation will be an on-going 10-



year rolling trend analysis of housing units created in Eureka by type. This program consists of three on-going actions:

- **Action One:** Each year, produce a series of graphs/tables outlining the total number of housing units created in the City, classified by category (such as single-family, multi-family, etc.) and, where feasible, affordability level. The graphs/tables will also include an on-going 10-year trend analysis of housing units created to evaluate the current year relative to past trends.
- **Action Two:** Based on the above graphs/tables, evaluate the City's efforts over the previous year to enact the implementation measures of the Housing Element, determine which efforts were most effective, and which efforts/programs need to be improved. The graphs, tables, and evaluation of City efforts will then be incorporated into a summary report.
- **Action Three:** Provide the annual report to the City's Housing Advisory Board, Planning Commission, and City Council. The report will be available to the general public.

Implements Policies: H-1.1, H-1.10, H-1.11, H-1.12, H-1.13, H-1.14, H-1.15, H-1.16, H-1.17, H-1.18, H-1.19, H-1.20, H-1.21, H-2.1, H-2.2, H-2.8, H-2.9, H-2.10, H-2.11, H-2.12, H-2.13, H-2.14, H-2.15, H-2.17, H-2.20, H-2.21, H-2.22, H-3.1, H-3.2, H-3.3, H-3.4, H-3.5, H-4.1, H-4.2, H-4.3

Timeframe: Annually 2020-2027

Responsible Parties: Development Services and Finance

Funding: Departmental budget

IMP H-2: Ongoing Evaluation and Refinement of Development Regulations

Locally-adopted development regulations, such as the Zoning Code, are the chief means of implementing the General Plan (including the Housing Element). It is important that the regulations are effective and meet the changing needs of the community. This program requires Development Services and other departments continually review and revise local development regulations, to ensure they are appropriate, effective, and consistent with state and federal law, and do not unduly burden the creation of housing. This program consists of two on-going actions:

- **Action One:** At the end of each calendar year, evaluate the City's development regulations, based on staff experience and community feedback, to determine if any City development regulations have proven to be unnecessarily burdensome or detrimental to the production of housing over the course of the year. Hold a community workshop once every 2 years for members of the public to present their ideas for zoning code modifications.



- **Action Two:** Provide the findings to the Planning Commission and City Council. City Council may direct staff to add, modify, or eliminate City development regulations that restrain or impede the production of housing.

Implements Policies: H-1.1, H-1.8, H-1.9, H-1.10, H-1.11, H-1.17, H-1.19, H-1.20, H-1.21, H-2.1, H-2.2, H-2.8, H-2.9, H-2.10, H-2.11, H-2.12, H-2.13, H-2.15, H-2.21, H-2.22, H-3.2, H-3.3, H-4.2

Timeframe: Annually and biennially 2020-2027. All revisions to be adopted within one year of being identified.

Responsible Parties: Development Services and Public Works

Funding: Departmental budget

IMP H-3: Revision of Specific Development Regulations

In mid-2019, the Eureka City Council rescinded the entire Eureka zoning code and adopted an entirely new zoning code. The new code eliminated many regulations that held back the creation of housing, simplified many development procedures, and included a substantial number of development incentives. However, additional reform to Eureka’s development regulations is necessary to further ease and promote the development of housing. Specifically, in pursuit of improving the development processes associated with the production of housing, the City’s Coastal Zone regulations need to be updated and modernized, as do the City’s subdivision and historic preservation regulations. This program consists of three one-time actions:

- **Action One:** Actively pursue Coastal Commission Certification of a substantially reformed City of Eureka Local Coastal Program that allows the following types of regulations and development options that support and promote the creation of housing: increased residential density, increased floor area ratios, increased building height limits, reduced parking standards, condominiums, townhomes, small lot subdivisions, conservation subdivisions, internal conversions, Accessory Dwelling Units (ADUs), live/work units, mixed-use developments, dense multi-story developments with upper floor residential, tiny houses, efficiency dwelling units, micro-units, shared housing, owner-occupied affordable housing, local affordable housing density bonuses, Affordable-by-design incentives, parking reduction incentives, and other housing-friendly regulatory options already allowed by the City outside of the Coastal Zone.
- **Action Two:** Comprehensively update the City’s subdivision regulations to improve readability both for staff and the public, ensure consistency with the Subdivision Map Act and other laws, and to provide clear regulatory paths forward for a diverse range of housing types such as small lot subdivisions and condominiums.



- **Action Three:** Comprehensively update the City’s historic preservation regulations to incorporate modern best-practices for preserving historic structures, without unduly constraining the creation of housing.

Implements Policies: H-1.1, H-1.7, H-1.9, H-1.10, H-1.11, H-1.12, H-1.15, H-1.16, H-1.17, H-1.19, H-1.20, H-1.21, H-2.1, H-2.2, H-2.8, H-2.9, H-2.10, H-2.11, H-2.12, H-2.13, H-2.15, H-2.21, H-2.22, H-3.1, H-3.3, H-4.2

Timeframe: 2020 (Actions 1 and 2), 2021 (Action 3)

Responsible Parties: Development Services

Funding: Departmental budget

Imp H-4: Ongoing Evaluation and Refinement of Permit Fees and Utility Connection Fees

Along with development regulations, permit fees and utility connection fees are an important consideration in the establishment of an environment that is conducive to the production of housing. Including Eureka, there are seven incorporated cities in Humboldt County and several others in the general region. Eureka’s permit fees and utility connection fees should be equivalent to and/or competitive with the fees of other nearby jurisdictions. This program requires that City staff continually review, evaluate, and refine City permit fees and utility connection fees to ensure that they do not unduly burden the creation of housing. Additional analysis will be conducted periodically (not necessarily annually) to determine the feasibility and legality of fee reductions for developments that meet the affordable and special housing needs of the community. This program consists of three on-going actions:

- **Action One:** Each year, evaluate the City’s development related permit fees to ensure the City’s fees are competitive with fees established by other jurisdictions in the region, and to ensure none of the City’s fees substantially impede the production of housing.
- **Action Two:** Each year, evaluate the City’s development related permit fees to determine if it is feasible to establish reduced fees for housing developments that are affordable and provide for the special housing needs of the community.
- **Action Three:** Through the annual fee schedule adoption process by the City Council, make appropriate recommendations for fee updates.
- **Action Four:** Evaluate the potential to reduce or eliminate building permit fees and/or impact fees for ADUs and/or affordable housing units

Implements Policies: H-1.4, H-1.5, H-2.1

Timeframe: 2020-2027

Responsible Parties: Development Services, Public Works, and Finance



Funding: Departmental budget

IMP H-5: Process Improvement Action Plan

Efficient and effective development review processes, permitting procedures, and customer service standards are critical to facilitate the creation of housing. When a person applies for any development-related permit, the proposed development undergoes review by a number of City departments. Typically, development-related applications are distributed for review to at least three City departments; the Development Services Department confirms the application meets zoning requirements (uses, setbacks, building heights); the Engineering Division of Public Works evaluates access and infrastructure needs (driveway access, utility connections, PIRs, etc.); and the Building Division of Public Works reviews the construction drawings to ensure the project complies with State and City the building codes. For some projects, Humboldt Bay Fire, the Eureka Police Department, PG&E, Caltrans, and other entities also participate in plan reviews. To achieve timely, efficient, accurate, and consistent development review, the various reviewing departments and agencies need to work in harmony. This program calls for a review of existing procedures, exploration of best practices, and consideration of potential workflow process improvements. This program consists of three on-going actions:

- **Action One:** Conduct a multi-department customer service survey aimed at property owners, business owners, and development professionals that have engaged in development processes in Eureka within the past two years of when the survey is issued. The purpose of the survey is to determine which City development review processes, permitting procedures, and customer service standards are the greatest obstacles to development, from the perspective of those individuals seeking to engage in development.
- **Action Two:** Following the survey reevaluate existing development-related procedures/processes, propose modifications, and implement workflow process improvements.
- **Action Three:** Following each survey provide update reports to the City Council regarding customer service improvement efforts. The City Council may direct staff to add, modify, or eliminate processes that restrain or impede the production of housing.

Implements Policies: H-1.1, H-1.2, H-1.10, H-1.11, H-1.18, H-2.1

Timeframe: 2021-2022

Responsible Parties: Development Services, Finance, and Public Works

Funding: Departmental budget and General Fund for consultant



IMP H-6: Public Improvements Required (PIR) Evaluation and Update

Public Improvements Required (PIRs) consist of installation of, or repairs to, public infrastructure, such as sidewalks, curbs, and alleys, funded by individual property owners or developers. Under current City regulations, PIRs are triggered when a person applies for a building permit with a job value (labor and materials) in excess of \$11,000. The \$11,000 trigger applies to all combined projects within a rolling 12-month period. For instance, a \$7,000 roof in June and a \$5,000 bathroom remodel in September would trigger PIRs. Once this threshold is met, the subject property is required to be brought up to full conformance with City standards if the City determines that the infrastructure is deficient (e.g. the sidewalk is severely cracked and needs to be reconstructed). The intent of these requirements is to gradually add to or replace the City's street and alley infrastructure without government subsidies. However, in some cases, the cost of PIRs may discourage housing creation. For example, a hypothetical person that has budgeted \$30,000 to convert a garage to an Accessory Dwelling Unit (ADU) could be informed that they need to replace a portion of the sidewalk and curb that runs along their property. The hypothetical cost of the repair could be \$15,000 or more. In this case, the property owner may abandon the ADU project altogether, due to the unforeseen increase in total project costs. This program requires a comprehensive review of the current regulations, a study of best practices from other California communities, and a redesign of the regulation to best balance the need to improve degraded infrastructure with the need to create housing. This program consists of two one-time actions:

- **Action One:** Evaluate existing regulations regarding PIRs; conduct a comprehensive review of the current best practices from other California communities; evaluate the implications of potential modifications; and develop a report of findings.
- **Action Two:** Provide the findings to the City Council. The City Council may direct staff to update policies and/or pertinent portions of the Eureka Municipal Code.

Implements Policies: H-1.3, H-2.1, H-2.10

Timeframe: 2020-2021

Responsible Parties: Development Services and Public Works

Funding: Departmental budget

IMP H-7: Produce Housing-Development Related Educational/Promotional Materials

In mid-2019, the Eureka City Council rescinded the entire Eureka zoning code and adopted an entirely new zoning code. The new code eliminated many regulations that held back the creation of housing, simplified many



development procedures, and included a substantial number of development incentives. These new regulations/incentives must be advertised and promoted so property owners and the development community are aware these new options are available.

For instance, the recently adopted code substantially advances opportunities for mixed-use residential development in commercial zones, including multi-story buildings with upper floor residential units, especially near transit stops. Mixed-use residential developments have multiple advantages and can satisfy many of the goals and policies of the Housing Element. Residential units in dense, multi-story buildings are likely to be smaller than other types of residential units, typically making them more affordable. Such development may also include a range of unit sizes, providing for a diverse mix of income levels in the same building. It is also possible for some or all of the units to be subdivided into condominium units, providing opportunities for owner-occupied housing and, in some cases, affordable owner-occupied housing. Mixed-use residential developments are also typically closer to amenities, such as transit stops, entertainment opportunities, grocery stores, and other basic needs. Such proximity can reduce or eliminate the need for vehicle ownership, thereby enhancing overall affordability. According to staff analysis, such developments are likely to constitute a substantial portion of the overall housing units developed in Eureka in the coming 20 years.

Another example of a recently created regulatory option for housing creation is Small Lot Subdivisions, which provide an opportunity to develop additional single-family homes on already-developed lots. Small Lot Subdivisions are possible in multi-family residential zones and result in the creation of smaller-than-average developable lots (down to 2,000 square feet per lot). A typical example would be an existing small home (e.g. 1,200 square feet) on a standard City lot (e.g. 6,000 square feet). A portion of the lot (e.g. 3,000 square feet of the backyard) could be subdivided to provide a new buildable lot, which could then host a smaller (and therefore more affordable) 800-square-foot unit. Small Lot Subdivisions have a number of advantages and can satisfy many of the goals and policies of the Housing Element. This regulatory option can generate housing units in places where property owners formerly never saw such an opportunity (such as a large and unused back yard). As a consequence, the number of residences (i.e. the *actual* residential density) can increase in a neighborhood, without a substantial alteration of the neighborhood fabric, or demolition of existing structures. While Accessory Dwelling Units (ADUs) are located on the same lot as their respective primary unit, and therefore cannot be sold, Small Lot Subdivisions create legal separate lots, which means they can be individually sold. Small lots are inherently more affordable than larger lots, and host smaller housing units, which are also inherently more affordable. Accordingly, Small Lot Subdivisions are among the best means of creating owner-occupied affordable housing.



The State of California recently required all jurisdictions to allow ADUs in Residential zones. The City of Eureka has gone beyond State requirements and provides enhanced allowances for ADUs because they can satisfy many of the goals and policies of the Housing Element. A property owner that does not want to subdivide their backyard can instead build a small ADU as a rental unit. This option not only provides the property owner with a source of rental income, it also provides a smaller-than-average (and therefore typically more affordable) housing unit that did not previously exist.

Conservation Subdivisions are another recently created regulatory tool. This option is valuable for parcels that have physical characteristics such as steep slopes and/or gulches that prevent or hinder traditional development. This regulatory option allows the owner of the property to preserve the unbuildable portions of the lot for conservation, while shifting the development rights of the unbuildable portion to the buildable portion of the lot. The overall gross density of the parcel remains the same, but the net density of the buildable portion of the lot may be substantially higher than otherwise would be allowed.

Internal conversions and adaptive reuse of existing underutilized structures is another regulatory option in the zoning code, and is among the least expensive and most commonly pursued path to create housing. Compared to new construction, development costs may be reduced because internal conversions take advantage of existing foundations, walls, and roofs. This type of develop has the additional benefit of reducing neighborhood impacts because new buildings are not being constructed; in many instances, adjacent property owners are not aware that a conversion has occurred, or that a new housing unit has been created. Typical examples are converting unused garages to residential units or transforming vacant office spaces to residential units.

The City's updated regulations also provide incentives for "Affordable-by-design" housing, which consists of housing units that are less than 500 square feet and are not required to provide a dedicated off-street parking space. These units are naturally affordable, as opposed to being deed-restricted affordable. This is because, based on standard rental rates in Eureka, units that are less than 500 square feet are typically naturally available to low and moderately low income households in Eureka (i.e. the rent for such units is often less than 30 percent of the income of low income households). These small units are typically most appropriate for one- and two-person households, which is a growing demographic sector in Eureka. Affordable-by-design developments can consist of rental or owner-occupied housing units and may be either attached (e.g. apartment building/condominiums) or detached (e.g. bungalow courts). Another advantage of small units is they can lead to considerably more density. For example, an Affordable-by-design development on a 6,000-square-foot lot may have twelve 500-square-foot units instead of six 1,000-square-foot units.



Finally, the newly adopted zoning code includes a number of 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.

While all of the above new pro-growth and pro-housing regulations are now available in Eureka, these options will only lead to the stimulation of new housing development if information about these new regulations is broadcast to property owners, development professionals, and prospective developers. The intention of this program is to initiate the production of a range of educational and promotional materials. This program consists of four actions:

- **Action One:** Produce a list of the existing development regulations/incentives that are most likely to stimulate the creation of housing and that property owners and private development professionals may find the most informative. The list is likely to include: small lot subdivisions, conservation subdivisions, opportunities for internal conversions, accessory dwelling units, live/work units, mixed-use developments, dense multi-story developments with upper floor residential, tiny houses, efficiency dwelling units, micro-units, shared housing, owner-occupied affordable housing, local/State affordable housing density bonuses, Affordable-by-design incentives, parking reduction incentives, and opportunity zones.
- **Action Two:** Identify the education/promotional communication mediums that would be most effective at conveying the list of development regulations/incentives produced above to property owners and development professionals. The mediums most likely to be identified include: a new “Eureka Housing Regulations and Incentives” website with interactive mapping features, on-line videos, printed materials such as flyers and brochures, social media promotions, and direct mailings to property owners.
- **Action Three:** Produce custom educational/promotional materials for each of the above items utilizing the medium(s) most likely to stimulate housing. For instance, direct mailing of brochures may be the best method of promoting accessory dwelling units while a customized, interactive, map-based website may be the best method of promoting small lot subdivisions. Update educational/promotional materials as needed.
- **Action Four:** Make the materials produced above widely available. Ensure that staff is available on an on-going basis to respond to inquiries regarding development regulations, options, and incentives.

Implements Policies: H-1.7, H-1.8, H-1.9, H-1.12, H-1.15, H-1.16, H-1.17, H-2.1, H-2.2, H-2.3, H-2.4, H-2.5, H-2.6, H-2.7, H-2.9, H-2.10, H-2.11, H-2.12, H-2.13, H-3.1, H-3.2, H-3.3, H-3.4, H-3.5 H-4.2



Timeframe: 2020-2022

Responsible Parties: Development Services, Finance, and Public Works

Funding: Departmental budget and General Fund for costs of printing/mailing)

IMP H-8: Outreach and Training to Development and Real Estate Professionals

It is critical local development and real estate professionals understand local development regulations, options, and incentives. As the City shifts to a more active role in helping to facilitate the creation of housing, the changing regulations need to be communicated regularly and accurately to professionals in the field. This program calls for comprehensive and ongoing outreach and education efforts, chiefly to help development professionals understand possible development scenarios. This program consists of four on-going actions:

- **Action One:** Generate and maintain a list of housing-related non-profits, realtors, design professionals, contractors, and other development and real estate professionals in Humboldt County. Update list annually.
- **Action Two:** At least once per year, distribute the City’s housing-development related educational/promotional materials to individuals/organizations on the list.
- **Action Three:** At least once per year, present the City’s housing-development related educational/promotional materials to industry groups (such as Realtor Associations, engineering associations, etc.).
- **Action Four:** Ensure that staff is available on an on-going basis to respond to inquiries regarding development regulations, options, and incentives.

Implements Policies: H-2.1, H-2.2, H-2.3, H-2.4, H-2.5, H-2.7, H-2.16

Timeframe: 2020-2027

Responsible Parties: Development Services, Finance, and Public Works

Funding: Departmental budget

IMP H-9: Residential Pre-Permitting Programs

The permitting and entitlement process can be expensive, time consuming, frustrating, and intimidating. In an effort to ease the challenges of the permitting process, Eureka will create and/or explore a number of techniques to provide pre-permitting options. Each of these options seeks to either eliminate an early-stage permitting requirement or to provide a no-cost permitting pathway. This program consists of three actions:



- Action One: Establish a Preliminary Site Plan Approval Program (PSPAP): Staff and property owners will work together to produce parcel-specific reports and preliminary site plans for specific sites. The process will begin with Planning staff creating a report that outlines in detail, all of the relevant development standards applicable to the site/parcel, describe all known and likely encumbrances and constraints (such as parking indentures or mapped wetlands), disclose the available permit history of the site (such as past variances), and describe the development potential of the site. The applicant hire an architect/engineer/draftsperson to sketch one to three development scenarios, based on the report. The City’s Planning, Building, and Engineering Divisions will then provide written comments on the development scenarios. The applicant will then have a detailed site report, one to three professional development scenarios, and written comments from various City departments. Collectively, these materials can be used by the applicant to market the property for sale, and/or to raise investment funds to construct a future project at the site. For example, on a vacant site in a multi-family residential zone, staff would assist the property owner to analyze the site and then create conceptual site layouts for a single-structure six-plex, a bungalow court with six standalone buildings/units, and a small lot subdivision with three duplex units. The property owner could then use these materials to advance their own development with greater confidence, or to market their property.
- Action Two: Pre-approved Accessory Dwelling Unit (ADU) Plans Program: Evaluate the value and effectiveness of establishing a “Pre-approved ADU Plan Program” (Program). Develop an estimate of the likely costs to be incurred by the City in developing the pre-approved plans, research best practices from other communities with similar programs, determine the degree to which similar programs from other communities are actually utilized, evaluate the likelihood that such a Program would actually be utilized in Eureka, and develop and present a report and recommendation to the City Council. If pursued, the City would hire an architect(s) to develop at least three unique sets of site/building plans for ADUs. The plan sets would need to be generic enough to be adaptable to any applicable parcel in the City, but specific enough to comply with the development standards of the City and other participating agencies, as well as the California Building Code. The plans would be approved by all relevant departments of the City and would then be freely available to the general public. Anyone interested in building an ADU could then select the pre-approved plan set that best fits their individual needs, hire a design/development professional to customize the plans as needed to fit their specific site, and then submit the revised plans to the City. The objective of the Program would be to reduce the costs and time required to develop an ADU, but staff experience indicates that such a Program may not be particularly effective at accomplishing these objectives.



- **Action Three:** Acquire funding to complete a Downtown Specific Plan and complete a CEQA analysis for the development of specific, high-priority parcels, with particular emphasis on creating dense, multi-story developments with upper floor residential units.

Implements Policies: H-1.6, H-2.1, H-2.2, H-2.7, H-2.9, H-2.10, H-2.11, H-2.13, H-3.3

Timeframe: 2020-2027(Action 1); 2021-2022 (Action 2); 2020-2021 (Action 3)

Responsible Parties: Development Services and Public Works

Funding: Departmental budget and General Fund consultant costs

IMP H-10: Downtown Parking Management Plan

Pursue the creation of a comprehensive Downtown Parking Management Plan providing recommendations regarding the most efficient and economically viable ways to manage the fixed amount of on-street and off-street parking spaces located in Downtown Eureka. This is important for the future development of multi-story buildings in the Downtown area because there is simply not enough space to construct large, private parking facilities without demolishing existing structures. Because the 2040 General Plan clearly establishes a community vision that prioritizes the preservation and rehabilitation of structures, while also promoting dense infill mixed-use development, an alternative path forward must be devised. A key purpose of the plan will be to project the likely individual impacts of specific developments, as well as the combined impacts of successive developments over time. For example, a series of multi-story apartment buildings built over a 10-year period would each have its own unique impact on the parking supply, both in the entire Downtown area, and on the blocks immediately surrounding the development. The Downtown Parking Management Plan would provide a suite of procedures and thresholds for City staff to use to effectively accommodate new development, without being inappropriately permissive or restrictive. Further, because the preservation and expansion of coastal access is an important concern in Old Town, the data, procedures, and thresholds contained in the Downtown Parking Management Plan may serve to inform the decisions involved in the Local Coastal Program Update. The LCP update process is currently ongoing and anticipated to be complete in the coming year. The data may provide support for various pro-housing development standard updates proposed in the Local Coastal Program.

The plan will contain an inventory of available parking, data on usage rates by different users, both by location and by time of day, an analysis of the most effective locations in which to charge for parking, and a detailed consideration of actions the City can take to manage parking in a complex mixed-use environment, with retail/office uses on the ground floor and residential/office uses on the upper floors. The plan will prescribe the most appropriate ways the City can use tools such as parking permits, parking



meters, and parking enforcement to facilitate the best parking-related outcomes for all residents and visitors to Downtown. This program calls for the creation of a plan that would provide a parking management roadmap into the future, as Eureka continues to infill. This program consists of three one-time actions:

- Action One: Secure funding.
- Action Two: Release RFP seeking a consultant to complete the Parking Management Plan.
- Action Three: Complete and implement the plan, incorporating recommendations throughout all City departments.

Implements Policies: H-1.7, H-1.9, H-2.2, H-2.20

Timeframe: 2020-2021

Responsible Parties: Development Services and Public Works

Funding: SB-2 Planning Grant

IMP H-11: Developable Lands Inventories and Recruitment

The City of Eureka contains approximately 10,000 parcels. While the majority of these parcels are either fully developed (i.e. contain existing residential or multi-story buildings) or are undevelopable (i.e. contain extensive coastal wetlands), some parcels in the City are either entirely vacant or have not reached their full development potential. These developable lands fall into two primary categories: publicly-owned and privately owned.

Publicly owned lands can provide a substantial opportunity for the development of housing because government entities have direct control over the development of the site, instead of merely indirect regulatory control. Privately-owned lands also present significant opportunities for the creation of housing. While the City’s control of private land is limited to regulatory oversight, the City can have a significant role in stimulating, encouraging, or incentivizing private property owners to pursue development options. This program calls for an extensive analysis of all parcels in the City, the maintenance of a detailed inventory of all parcels that contain the potential of hosting new housing units, and actively recruiting property owners, with the objective of stimulating housing development.

Through the inventory and recruitment process, the City will continue to ensure adequate sites are available (as defined by state housing element law, Government Code Section 65583) to accommodate the City’s Regional Housing Needs Allocation (RHNA) for all income groups. Each year, as part of the City’s annual evaluation of its implementation of the General Plan, the City will monitor the progress in meeting the RHNA



through production, and identify the remaining residential development potential in relation to the City's RHNA. This effort will be directly tied to the inventory and recruitment processes. This program consists of four on-going actions:

- **Action One:** Analyze all parcels in the City and create/maintain a housing development site inventory of all parcels with the potential of hosting new or additional housing units.
- **Action Two:** Utilize the City's housing development site inventory to identify high-priority, publicly-owned sites with the best potential for development of the type and number of dwelling units most needed in the City. For each site, conduct a basic site constraint analysis and evaluate the potential for a range of development options. Share the preliminary analysis and concepts broadly, and discuss sale/development interest. Where appropriate, also share the City's educational and promotional materials.
- **Action Three:** Utilize the City's housing development site inventory to identify high-priority, privately-owned sites with the best potential for development of the type and number of dwelling units most needed in the City. For each site, conduct basic site constraint analysis and evaluate the potential for a range of development options and incentives, such as: small lot subdivisions, conservation subdivisions, internal conversions, accessory dwelling units, live/work units, mixed-use developments, dense multi-story developments with upper floor residential, tiny houses, efficiency dwelling units, micro-units, shared housing, owner-occupied affordable housing, local affordable housing density bonuses, Affordable-by-design incentives, parking reduction incentives, opportunity zones, and other housing-friendly regulatory options. Contact the owners of each high priority site, share the preliminary analyses, and actively encourage owners to build or sell. Where appropriate, also share the City's educational and promotional materials.
- **Action Four:** Maintain RHNA site inventory, evaluating and counting each development that creates housing on all parcels identified in the Housing Element.

Implements Policies: H-2.2, H-2.3, H-2.4, H-2.5, H-2.7, H-2.9, H-2.11, H-2.12, H-3.1, H-3.3,

Timeframe: 2021 (Action 1) 2022 (Action 2) 2023 (Action 3), 2020-2027 (Action 4)

Responsible Parties: Development Services and Finance

Funding: Departmental budget



IMP H-12: Accessory Dwelling Unit Assistance Program

Of the approximately 10,000 parcels in the City of Eureka, nearly 6,000 of the parcels are zoned single-family residential. While the vast majority of these parcels already contain a single-family residential structure, these 6,000 parcels still constitute one of the most significant opportunities for the production of housing units in Eureka because each parcel is permitted to contain an Accessory Dwelling Unit (ADU). Of all the strategies Eureka is employing to stimulate the creation of housing, ADUs may constitute the single biggest long-term opportunity for housing production and are also likely to be one of the best methods of creating “Affordable-by-design” rental housing units. Accordingly, this Program focuses on providing enhanced and focused assistance to property owners of single-family residential properties, with the objective of promoting ADUs and simplifying the process of developing ADUs to the greatest degree possible. The ADU target creation rate is 20 per year (160 total during the planning period). See **Table 51 Summary of Non-Site Specific Housing Targets** in the Technical Appendix for more detail.

This program is also supported by and complementary to the following Implementation Programs:

- Pre-approved ADU Plans Program (under Residential Pre-Permitting Programs)
- Ongoing Evaluation and Refinement of Permit Fees and Utility Connection Fees
- Produce Housing-Development Related Educational/Promotional Materials
- Adopt Building Code Appendix Q (Tiny House Provisions)
- Explore Allowing Tiny Houses on Wheels (THOWs)

This program consists of five on-going actions:

- Action One: Unpermitted ADU Amnesty Program: Investigate the potential for an ADU amnesty program; create and present a report to the City Council for further direction.
- Action Two: ADU Ambassador Program: Financing the construction of ADUs is among the most significant barriers to the creation of ADUs. The various financing mechanisms can be confusing and overwhelming for average homeowners unaccustomed to substantial development projects. This program consists of the creation of an ADU educational program, directed at local banks, credit unions, and other lenders. Local financial institutions will be encouraged to appoint an “ADU Ambassador,” who will be the local representatives within the financial institution. Each Ambassador will complete an educational program hosted by the City. The Ambassadors will then serve as the



primary point of contact at each of their respective institutions for homeowners interested in financing and constructing an ADU. Development Services staff will maintain the list of ADU Ambassadors and will distribute the list to interested homeowners seeking information about ADU development.

- **Action Three:** Explore ADU Fee Reductions: Permit fees can add substantially to ADU development costs. Fees include building permit fees, utility connection fees, and impact fees. Some fees are required by law for cost recovery purposes, while others may be able to be reduced. In association with the Implementation Program “Ongoing Evaluation and Refinement of Permit Fees,” the City will explore options for reducing and/or eliminating certain fees in certain instances, to make ADU development more affordable.
- **Action Four:** Annual Prefab Research Report: Prefabricated housing often costs less to construct than site-built housing, and may provide a means to create more affordable ADUs. However, the type and number of prefabricated housing manufacturers varies from year-to-year and shipping proves challenging for north coast customers. New firms start, others go out of business, and others regularly reconfigure the products they offer. This program tasks the Development Services Department with researching the topic once every three years and creating a brief report. The content of the report will be provided to property owners interested in creating an ADU.
- **Action Five:** Enhanced Outreach and Recruitment: Given the substantial opportunity that ADUs provide for the creation of new housing units in Eureka, extra effort will be invested into outreach and recruitment. Building on efforts established under other Implementation Programs (such as “Pre-approved ADU Plan Program” and “Produce Housing-Development Related Educational/Promotional Materials”) the City will periodically provide mailers to owners of eligible parcels, in an effort to stimulate the creation of new ADUs.

Implements Policies: H-1.6, H-1.16, H-1.21, H-2.2, H-2.10, H-3.1

Timeframe: 2023-2024 (Action 1); 2020 (Action 2); 2020 (Action 3); 2021, 2024, and 2027 (Action 4); 2021-2027 (Action 5)

Responsible Parties: Development Services, Finance, and Public Works

Funding: Departmental budget and General Fund for postage)

IMP H-13: Adopt Building Code Appendix Q (Tiny House Provisions)

An upcoming update to the California Building Code may allow smaller minimum interior dimensions for dwelling units. This is being done to address the growing interest in living in small housing units (i.e. “tiny houses”). Chief among the frustrations for those building small living



quarters are the restrictions on the minimum heights of sleeping lofts and restrictions on the use of steep stairs/ladders. This program calls for the City to pursue adopting these updated building codes when they are adopted by the State, to make it easier for people to build code-compliant compact housing. This program consists of two one-time actions:

- **Action One:** Maintain awareness of the current regulations contained in the California Residential Code.
- **Action Two:** The Development Services Department and the Building Division will work together to pursue the local adoption of compact housing provisions, taking appropriate actions as necessary.

Implements Policies: H-1.12, H-1.13, H-2.2

Timeframe: 2020-2021

Responsible Parties: Development Services and Public Works

Funding: Departmental budget

IMP H-14: Explore Allowing Tiny Houses on Wheels (THOWs) as Residential Units

A Tiny House on Wheels (THOW) is a small structure built on a utility trailer and legally classified as a recreational vehicle (RV) and, as such, must comply with the California Vehicle Code and must be licensed by the Department of Motor Vehicles. According to the National Fire Protection Association Standard on Recreational Vehicles (NFPA 1192), the maximum size for an RV (and thereby a THOW) is 400 square feet. The water, wastewater, and electrical connections are the same as for RVs. RVs have traditionally been used for temporary recreational purposes and, per the Eureka Municipal Code, may not be used as permanent housing. This program explores the possibility of allowing THOWs to be a permitted regulatory option as permanent housing in limited circumstances. This program consists of two one-time actions:

- **Action One:** Evaluate existing policy/regulations regarding THOWs; conduct a comprehensive review of the current best practices from other California communities; evaluate the implications of potential allowances; and develop a report of findings.
- **Action Two:** Provide the findings to the Housing Advisory Board, Planning Commission, and City Council. The City Council may direct staff to update policies and/or pertinent portions of the Eureka Municipal Code, and develop and require design standards for Tiny Houses on Wheels.

Implements Policies: H-1.12, H-1.13, H-1.14, H-2.2, H-2.17

Timeframe: 2022

Responsible Parties: Development Services and Public Works

Funding: Departmental budget



IMP H-15: Motel Conversions to Affordable Housing

- Eureka contains some motels that periodically or regularly function as housing, rather than traveler accommodations. Often, the Humboldt County Department of Health and Human Services (DHHS) provides subsidies to some of the individuals living in these motels. In fact, DHHS relies on some motels in Eureka as a source of housing for some of the agency’s programs. If these motels were converted to genuine housing units, the sites may more efficiently and effectively serve the needs of the residents and DHHS. In some cases, the location, physical design, and layout of these developments lend themselves well to conversion to housing. Coincidentally, some of these motels have chronic and re-occurring code enforcement violations and/or very frequent calls to the Eureka Police Department. Converting the facilities from motels to housing may alleviate these challenges to some degree. The City will evaluate selected motels in town, review Code Enforcement and Police Department records, and coordinate with DHHS to understand the agency’s interests. The City will then reach out to select motel owners to help the owners explore the potential options for conversion to residential uses. Where appropriate, conversions can focus on housing for seniors, low- and moderate-income households, or special needs housing. On a case-by-case basis, the City will work with property owners and/or a nonprofit agency or developer, if approached, to convert one or more of these motels to residential use, and will make use of Housing Successor (former Redevelopment Funds), Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and other similar funds/programs to assist in the rehabilitation of these units. This program consists of two on-going actions: Action One: Develop criteria using Transient Occupancy Tax (TOT) payments, Code Enforcement engagements, and Eureka Police Department records to evaluate motels and then create a list of motels with potential to convert to affordable housing..
- Action Two: Contact candidate motel owners at least every three years to gauge interest and work on a case-by-case basis to facilitate conversions.

Implements Policies: H-1.12, H-2.2, H-2.14, H-6.1, H-6.2, H-6.2, H-6.4

Timeframe: 2020-2027 (Action 1 is repeated biennially; Action 2 will occur in 2023 and 2026)

Responsible Parties: Development Services, Finance, Public Works, Code Enforcement, and Police

Funding: Departmental budget, Housing Successor Funds, HOME funds, CDBG funds, or alternative funding source

IMP H-16: Maintain and Establish Relationships with Low Income Housing Developers and Subsidized



Housing Developers and Pursue Funding for Affordable Housing

Close relationships between the City and affordable housing developers are critical for the continued production of deed-restricted affordable housing units. This program sees the City continue to maintain a relationship with these housing creators and to stay abreast of the ever-changing development environment. To facilitate and support the development of subsidized housing units, the City will maintain, establish, and nurture partnerships with developers that specialize in subsidized- and low-income housing. Where appropriate, the City will assist with site identification, land acquisition, financing, permitting, and technical support. Specifically, the City will collaborate with developers to optimize their eligibility for financing under various federal, State, County, and private programs, such as Community Development Block Grant (CDBG), the Low-Income Housing Tax Credit program, and others. City Staff will also work with housing developers to promote ownership opportunities for low- and moderate-income households by providing technical assistance through the entitlement process and making funding available for Council-approved subsidized housing projects. Finally, whenever feasible, Eureka will consider using available City-owned properties as subsidized housing sites. If and when City owned sites are made available, they will be advertised to affordable housing developers. Additionally, the City will pursue available State and Federal affordable housing funding sources, many of which are only accessible through Humboldt County (typically the County Department of Health and Human Services). This program consists of three on-going actions:

- **Action One:** Maintain a regularly-updated list of federal, State, County, and private affordable housing funding programs and sources. Work closely with Humboldt County Department of Health and Human Services to understand the opportunities for acquiring such funding. Actively work with developers to utilize these funding opportunities for affordable housing projects.
- **Action Two:** Issue a press release once every other year indicating the City is seeking to generate a list of all property owners, developers, and development professionals interested in seeking funding for and/or building affordable housing in Eureka. Conduct research and outreach to identify individuals/organizations that have successfully developed affordable housing in the general region. Based on the above, create and maintain a list of affordable housing property owners, developers, and development professionals.
- **Action Three:** Distribute pertinent educational/promotional materials to each individual/organization on the list. Meet with individuals/organizations as requested and appropriate.

Implements Policies: H-1.5, H-1.15, H-1.18, H-2.13, H-2.16, H-2.18, H-2.19, H-5.2, H-5.3, H-5.7, H-6.1, H-6.2, H-6.3



Timeframe: 20120-2027

Responsible Parties: Development Services and Finance

Funding: Departmental budget

IMP H-17: Monitor and Preserve Existing At-Risk Units

The City will continue to keep an inventory of affordable housing units and promote the use of additional affordable housing assistance programs, as appropriate, to preserve existing affordable units that are at risk of converting to market-rate. This will be accomplished by working with public and/or private housing agencies that have expressed an interest in rights-of-first-refusal for publicly assisted housing projects at-risk of conversion to market-rate housing. When available, the City will utilize resources such as HUD Section 208/811 loans, HOPE II and III Homeownership program funds, HOME funds, Community Development Block Grant (CDBG) funds, Low-Income Housing Tax Credit Programs, California Housing Finance Agency single-family and multi-family programs, programs to stimulate private developer and nonprofit entity efforts in the development and financing of housing for low- and moderate-income households. The City will maintain a list of mortgage lenders participating in the California Housing Finance Agency (CHFA) program and refer the program to builders or corporations interested in developing housing in the City. This program consists of three on-going actions:

- Action One: Maintain an inventory of deed-restricted affordable housing.
- Action Two: Utilize funding sources for affordable housing including purchasing affordability covenants
- Action Three: Maintain and make available a list of mortgage lenders participating in CHFA.

Implements Policies: H-2.18, H-2.19, H-3.4, H-3.5, H-6.1, H-6.2, H-6.3

Timeframe: 2020-2027

Responsible Parties: Development Services and Finance

Funding: Departmental budget

IMP H-18: Housing for Special Needs Populations

It is important that special needs populations such as the elderly, persons with disabilities, persons with developmental disabilities, large families, farmworkers, families with female-headed households, families and persons in need of emergency shelter, and extremely low-income households have access to safe, affordable housing. The City will continue to work with affordable housing developers, seek out funding, and pursue all available means to create housing for these populations. The City intends to incentivize the creation of at least 50 housing units to serve the



special needs population by the below-listed actions. This program consists of four on-going actions:

- Action One: Continue to support affordable housing developers by maintaining contact on an on-going basis.
- Action Two: Study the need and feasibility of specific zoning tools that would encourage the creation of housing for special needs populations.
- Action Three: Review and prioritize special needs development funding.
- Action Four: Create and provide a brochure that explains the reasonable accommodation procedure. Distribute brochures to local organizations that work with disabled persons.

Implements Policies: H-1.5, H-1.15, H-1.18, H-2.13, H-2.16, H-2.18, H-2.19, H-2.22, H-3.4, H-3.5, H-4.6, H-5.2, H-5.3, H-5.7, H-6.1, H-6.2, H-6.3, H-6.4

Timeframe: 2020-2027 (Actions 1 and 3), 2023 (Action 2),

Responsible Parties: Development Services and Finance

Funding: Departmental budget

IMP H-19: Promote Historical Building Code

The Historical Building code is a valuable tool for the preservation of historic buildings. It is contained in state statute and is intended to facilitate the rehabilitation and repurposing of older buildings in ways that meet modern needs, but without compromising safety. As a city with a large number of historic structures, Eureka is well suited to take advantage of these provisions. This program calls for the City to ensure Staff from various departments are trained on the use of the Historical Building Code and to actively promote its use to project applicants. This program consists of two on-going actions:

- Action One: Provide periodic training to Staff on the applicability and potential use of the Historical Building Code.
- Action Two: Actively promote the use of the Historical Building Code when applicable.

Implements Policies: H-2.2, H-4.2, H-4.3

Timeframe: 2020-2027

Responsible Parties: Development Services and Public Works

Funding: Departmental budget



IMP H-20: Code Enforcement

Code enforcement is essential to ensuring housing preservation and rehabilitation. To maintain the existing housing stock, the City will enforce local zoning; housing, fire, and building codes; and standards for landscaping to maintain safe and decent housing. Property owners with code violations who meet eligibility requirements for participation in programs administered by the City will be offered an opportunity to correct code violations. The primary goal of this program is to provide reasonable controls for the maintenance, rehabilitation, preservation, and conservation of existing and future commercial and residential properties. This program consists of three on-going actions:

- **Action One:** Maintain, at a minimum, current staffing levels in the Code Enforcement Division.
- **Action Two:** Enforce and expand where necessary, the property maintenance provisions embodied in the California Green Building Code and the Zoning Ordinance in order to conserve and improve the quality of housing units in the City.
- **Action Three:** Develop and provide materials to residents and property owners informing them of available resources to assist in remedying code violations.

Implements Policies: H-1.21, H-4.3, H-4.4, H-4.7, H-4.8, H-4.9, H-5.5, H-5.6, H-5.8, H-6.1, H-6.2, H-6.3, H-6.4

Timeframe: 2020-2027

Responsible Parties: Development Services and Code Enforcement

Funding: Departmental budget

IMP H-21: Preventing Demolition-by-Neglect Program Exploration

Low-income rental housing is frequently lost due to negligent property owners who fail to maintain their properties. The City's Code Enforcement division works diligently to address the worst problems, though in some cases additional actions may be taken. The current system for selecting properties for abatement relies on a points system which uses citizen complaints and police calls to select properties. Other additional methods of identifying properties may exist, potentially being applied to a specified geographic area, and based on exterior inspections (e.g. "windshield survey). Potential solutions may involve a rental registry program that requires interior inspections. This program would see the City explore all available options to prevent the loss of housing by neglect. This program consists of two on-going actions:

- **Action One:** Evaluate existing policy/regulations regarding property maintenance requirements; conduct a comprehensive review of current best practices from other California communities; evaluate the



implications of potential expanded efforts; and develop a report of findings.

- **Action Two:** Provide the findings to the City Council. The City Council may direct staff to update policies and/or pertinent portions of the Eureka Municipal Code or other documents.

Implements Policies: H-2.18, H-2.19, H-4.3, H-4.4, H-4.8, H-4.9, H-5.5, H-5.6, H-5.8, H-6.1, H-6.2, H-6.3, H-6.4

Timeframe: 2024-2025

Responsible Parties: Development Services and Code Enforcement

Funding: Departmental budget

Imp H-22: Limit Number of Vacation Rentals and Compliance Drive

Vacation rentals are relatively common in Eureka. They have traditionally provided an alternative to hotels for people who planned to stay for longer periods of time (e.g. 10 days), or for visitors needing extra space (e.g. family reunions). Historically, vacation rentals were typically only located in areas of high touristic value, such as beachside communities. However, with the advent of smart phone apps and the sharing economy, operating vacation rentals from individual residences has become very easy. Changing consumer expectations meant that a broader range of people were interested in “vacation rentals,” such as solo travelers or people seeking to stay for only one night. Parallel to the rise in short term vacation rentals was a shortage of housing, which means that housing in general is not as plentiful or affordable as residents need. A concern has arisen that if a residence is being used to serve vacationers, then it is no longer providing housing to locals. The City of Eureka recognizes the need to balance these two important land uses. For this reason, City Council directed staff to update the vacation rental related provisions in the zoning code, consider instituting a cap on the total number of full-unit vacation rentals in residential zones, and pursue a compliance drive to ensure all vacation rentals are safe and pay the required Transient Occupancy Tax. This program consists of four actions:

- **Action One:** Hire a specialized consultant to locate the address of every vacation rental in Eureka and generate a list.
- **Action Two:** Cross check the list with all permitted vacation rentals. For those vacation rentals that are not permitted, send certified letters indicating that permits must be acquired within a limited grace period. At the end of the grace period, present a report to the City Council regarding the number of permitted and unpermitted vacation rentals.
- **Action Three:** Inform the unpermitted facilities of the violation and provide a list of required next steps.



Action Four: Based on the results of the report and the grace period, the City Council may consider imposing a cap on the total number of full unit vacation rentals allowed in residential zones. *Implements Policies:* H-5.1

Timeframe: 2020-21

Responsible Parties: Development Services and Finance

Funding: Departmental budget and General Fund for consultant

Imp H-23: Weatherization, Energy Efficiency, and Green Building Techniques

The City will continue to review building plans for conformance with state energy efficiency standards and will encourage and support energy-efficiency improvements for existing and proposed housing units. The City will promote currently available weatherization and energy conservation programs to residents, as well as evaluate the use of “green” energy efficient and environmentally sensitive construction techniques, amending the building code as appropriate. Staff will continue to maintain awareness of new legislation and green building processes.

To assist developers, the City will refer developers to green code and green rehabilitation manuals such as the U.S. EPA’s Sustainable Solutions for Historic Houses in Northern California. These manuals provide information and identification of alternative and/or sustainable building methods and materials used for the treatment of Eureka’s older housing stock. Additionally, whenever possible, the City will encourage and support energy-efficiency improvements and modifications for existing and proposed subsidized housing units and low income households.

The City will post and distribute information on currently available weatherization and energy conservation programs. Within Eureka, the Redwood Community Action Agency and the Redwood Coast Energy Authority provide weatherization services to both renter and owner-occupied households. The Weatherization Program provides high quality energy efficiency and weatherization services for income qualified low- to moderate-income households. Staff will provide information on applicable programs online and at City Hall.

The City will continue to evaluate the use of “green” (energy efficient and environmentally sensitive) alternative building methods and materials to coincide with the periodic adoption of codes at the State level. City staff will evaluate the feasibility of using alternative building methods and materials, taking compliance with state building codes and Eureka’s maritime climate into account. Where feasible and appropriate, the City will revise the Building Code to allow use of alternative building methods beyond the minimum requirements of Title 24.

This program consists of three on-going actions:



- **Action One:** Continue to encourage and enforce state energy efficiency standards and energy-efficiency improvements. Encourage residential developers to maximize energy conservation through proactive site, building, and building system design, material and equipment to maximize energy-efficiency that exceeds the provisions of Title 24 of the California Building Code. Assist developers to access passive design resources through brochures and the City’s website. Encourage use of upgraded insulation, advanced air infiltration reduction practices (air sealing), and low emissivity (Low-E) double-pane windows. Promote the use of energy efficient lighting, including fluorescent lighting. Provide information about available weatherization programs to increase awareness. Increase opportunities for and/or remove constraints to green-building in multi-family residential projects. Support building framing that promotes construction of tighter building envelopes with maximum height and sky exposure plans and minimum setbacks. Continue to refer developers to green code and green rehabilitation manuals.
- **Action Two:** Continue to promote weatherization and energy conservation programs. Continue to post and distribute information on currently available weatherization and energy conservation programs.
- **Action Three:** Encourage the use of Energy Star appliances and materials in subsidized housing developments. Continue to encourage and support energy-efficiency improvements and modifications for existing and proposed subsidized housing units and low income households. Study the feasibility of increasing energy-efficiency standards for publicly funded projects.

Implements Policies: H-4.1, H-5.6, H-5.8, H-6.1, H-6.2, H-6.3, H-6.4

Timeframe: 2020-2027

Responsible Parties: Development Services and Public Works

Funding: Departmental budget

IMP H-24: Promote Mills Act

A Mills Act agreement is an agreement between the City and the owner of a historic structure that allows for a reduction in property taxes in exchange for a legal commitment to utilize the tax savings to finance pre-approved property improvements. These property tax reductions can ease the cost burden of restoring historic structures, and serve to preserve historic buildings. This program consists of two on-going actions:

- **Action One:** Continue to provide educational/informational materials that explain how Mills Act contracts work and the benefits that they provide.
- **Action Two:** Distribute materials to eligible property owners.

Implements Policies: H-4.2, H-4.3



Timeframe: 2020-2027

Responsible Parties: Development Services

Funding: Departmental budget

IMP H-25: Various Housing Assistance Programs

Over the past several decades, the City has administered a number of housing acquisition, homeownership assistance, and residential rehabilitation programs. Many of the programs were funded by the City's Redevelopment Agency, which was dissolved in 2012 and is therefore no longer an option for funding such programs. Other programs have been funded by competitive funding sources administered by State/Federal agencies, such as CDBG, HOME, CalHOME, HCD, and others. However, in recent years, the eligibility criteria for these competitive State programs has become increasingly infeasible in Eureka. For instance, the City acquired over one million dollars in CDBG homeownership Assistance grant awards from 2012 and 2016. The City expected to issue up to 14 homeownership assistance loans with the combined 2012 -2016 grant award loans. However, despite extraordinary effort and outreach, the City was only able to provide seven homeownership loans from the two CDBG grant awards. While the City screened over 120 interested applicants, HCD program guidelines forced the City to disqualify all but seven of the applicants. In addition, HCD program guidelines regarding home prices were out of alignment with actual housing costs in Eureka, and only seven homes fell within the limited range of purchase price required by HCD. Accordingly, until the State reforms its program guidelines, the State competitive funding sources may not be viable in Eureka. Effectively, these programs have been suspended by the City.

Fortunately, some of the legacy programs previously administered by the City included revolving loan funds, which means incoming loan payments will provide some on-going funding sources to continue some of these programs. For instance, a CalHOME repaid loan provided the City with enough revenue (program income) to issue one owner-occupied rehabilitation program loan. In addition, repaid loans from the State Rental Rehabilitation Program provided the City with enough revenue (program income) to issue two loans for rehabilitation of two multi-family low income rental units, one a six-plex and the other an eight-plex.

Another successful past program was the "Graffiti Clean-up Kit Program," which was sponsored by the City in cooperation with a privately-owned hardware store in Eureka. The intent of the program was to assist property owners with the removal of graffiti from residential neighborhoods. To be eligible, applicants were required to be owner-occupied residents of a single-family dwelling within the city limits. Eligible applicants then obtained a voucher for a kit from the hardware store. Graffiti Clean-up kits typically consisted of: color matching services by the hardware store staff, paint, a paint brush, clean up cloth, drop cloth, stir stick, and a "wet paint"



sign. This program provided local residents with a valuable tool to help preserve their neighborhood when property defacement occurred. Additionally, the City provides approximately twenty dumpsters annually for residential neighborhood and code enforcement cleanup efforts.

The City will continue to administer housing assistance programs as funding is made available through the accrual of incoming loan payments. The City will also monitor opportunities to reinstate some programs when viable State/federal funding/programs become available. This program consists of seven on-going actions:

- Action One: Homeownership Assistance Loan Programs. The City will monitor State and Federal grant/loan programs associated with homeownership assistance and residential rehabilitation assistance. The City will pursue grants/loans when the terms of such programs are viable in Eureka. The City will also maintain an interest list of individuals that may seek such grants/loans in the future.
- Action Two: Owner-occupied Rehabilitation Program. The City will monitor State and Federal grant/loan programs associated with owner-occupied rehabilitation assistance. The City will pursue grants/loans when the terms of such programs are viable in Eureka. The City will also maintain a list of individuals that may seek such grants/loans in the future.
- Action Three: Multi-family and Rental Rehabilitation Program. The City will monitor State and Federal grant/loan programs associated with multi-family and rental rehabilitation assistance. The City will seek to acquire grants/loans when the terms of such programs are viable in Eureka. The City will also maintain an interest list of individuals that may seek such grants/loans in the future.
- Action Four: Senior Home Repair Grant Program. The City will monitor State and Federal grant/loan programs associated with Senior home repair and rehabilitation assistance. The City will seek to acquire grants/loans when the terms of such programs are viable in Eureka. The City will also continue to provide funding annually from the City's LOCAL funding program's repaid loans to provide for administration of this program by the Humboldt Senior Resource Center, who provides the services to low income seniors who require eligible small home repairs to remain safely in their homes.
- Action Five: Wheelchair Ramp Grant. The City will monitor State and Federal grant/loan programs associated with wheelchair ramp grants and other ADA infrastructure rehabilitation/construction grants. The City will seek to acquire grants/loans when the terms of such programs are viable in Eureka.
- Action Six: Graffiti Clean-up Kit Program. The City will explore opportunities to reinstate, expand, and advertise this program.
- Action Seven: Dumpster Grant Program. The City will maintain a relationship with Recology (Eureka's solid waste and recycling



provider), provide promotional materials, and actively promote participation in the program.

Implements Policies: H-2.18, H-2.19, H-3.4, H-3.5, H-4.4, H-4.5, H-5.3, H-5.6, H-5.8, H-6.7

Timeframe: 2020-2027

Responsible Parties: Development Services and Finance

Funding: Department budget and various local, state, and federal funding sources

IMP H-26: Vacant Home Outreach and Exploration of Vacancy Tax

According to the Census Bureau, Eureka had 296 vacant housing units in 2010. This number did not include homes that were vacant due to being for sale or homes that were used seasonally (e.g. summer homes). Public concerns over long-term vacancies are frequently brought to the City’s attention, as vacant properties often become dilapidated and are a target for squatters. This program requires staff to reach out to owners of vacant homes to determine the cause of vacancies and to assist the owners in returning properties to the City’s active housing stock, when possible. Depending on the success of the outreach effort, the City may explore the potential for taxes, fines, or punitive actions against property owners who keep their properties vacant long term. This program consists of three on-going actions:

- Action One: Send letters of inquiry to all properties with residential units that appear vacant, as evidenced by a lack of municipal water usage.
- Action Two: Evaluate the establishment of a vacant property registration program.
- Action Three: Explore means of compliance for property owners that continue to maintain vacant residential units in the long term and provide a recommendation to the City Council.

Implements Policies: H-5.3, H-5.4, H-5.5

Timeframe: 2023

Responsible Parties: Development Services

Funding: Departmental budget

IMP H-27: Update Eureka’s Homeless Strategy

Humboldt County and the City of Eureka have a higher than average rate of homelessness relative to other regions of the State. In recognition of the importance of this issue to the community, the City has worked diligently to understand the issues surrounding homelessness and to work toward



lasting solutions. The following are milestones in the City’s progress over the past years:

- 2014: The City hosted three Homelessness Focus Groups (Community Leaders, Homeless Services Providers, and Consumers) to provide local input and perspectives on homelessness issues, impacts, and solutions. The outcome of the Focus Groups’ efforts included a policy paper with a suggested strategy to end homelessness in Eureka, which was adopted by the City Council.
- 2015: In collaboration with Humboldt County Department of Health and Human Services, the City implemented the “Mobile Intervention Services Team” (MIST) to focus on more effectively reducing homelessness and to conduct outreach to unsheltered homeless people in Eureka.
- 2016: Palco Marsh. The City undertook the challenging task of removing hundreds of homeless individuals that were illegally camping in a coastal habitat restoration area. Substantial efforts were made to provide services and housing assistance, including the creation of short-term shipping container housing and temporary sleeping areas
- 2016: A coordinated County/City effort created a County-wide "Housing First Summit," launched a "Housing 30 Homeless People in 60 Days Campaign," housing 70 people in 60 days, as well as hiring a Homeless Program Manager in 2017.
- 2017: The City partnered with Humboldt County to co-adopt a “Housing First” strategy. This was the City’s first homelessness strategic plan. The City also partnered with Waterfront Recovery Services to focus on providing drug treatment services for people experiencing homelessness.
- 2018: The Eureka Police Department (EPD) established the Community Safety Enhancement Team (CSET) to proactively address quality of life, crime and disorder problems and developed strategies to ultimately improve upon or eliminate these issues. CSET focuses on areas where the homeless tend to congregate, including in Old Town, along the waterfront, and in city parks, with a goal of balancing accountability with compassion and outreach, while working to address the underlying causes of an individual’s negative behavior
- 2019: The City updated its zoning code, which included simplifying the development regulations for low-barrier-to-entry housing types such as single room occupancy (SRO), added incentives to construct Affordable-by-design housing (<500 square feet), and other provisions designed to encourage the creation of housing. The City also established Uplift Eureka, a City-run mentorship program that helps people experiencing homelessness obtain housing and employment.



Looking forward over the 2020 to 2027 planning horizon, the City needs a homelessness strategic plan for the next eight years. This program consists of three on-going actions:

- **Action One:** Evaluate the City’s existing strategies regarding homelessness, conduct a comprehensive review of the current best practices from other California communities, and develop a report of findings.
- **Action Two:** Provide the findings to the Housing Advisory Board, and City Council. The City Council may direct staff to implement recommendations from the report.
- **Action Three:** The City will produce and adopt a new homelessness strategic plan that prioritizes resources for homelessness.
- **Action Four:** The City will advocate for State and County resources to address homelessness in Eureka

Implements Policies: H-1.16, H-2.2, H-2.16, H-2.17, H-2.18, H-2.19, H-2.22, H-3.1, H-3.3, H-7.1, H-7.2H-7.5

Timeframe: 2020-2022 (All actions completed within this time frame)

Responsible Parties: Development Services, Finance, City Manager, and other City departments identified during the planning process.

Funding: Departmental budget and General Fund for consultant

IMP H-28: Advocate for Balanced Distribution of Resources County-wide

As the county-seat and the largest city in the region, many of the area’s homelessness-related resources and programs are concentrated in Eureka. While this is sensible and beneficial to some degree, an over-concentration of resources/programs in Eureka can be detrimental to Eureka, to the region, and to the overall effort to eliminate homelessness. The City will work with the various branches of the Humboldt County government, as well as the six other incorporated cities in the County, to advocate for a balanced distribution of low income and homelessness resources and projects throughout the County and discourage resources, projects, and solutions to be over-concentrated in Eureka. This program consists of two on-going actions:

- **Action One:** As needed, advocate for the Humboldt County government to develop a coordinated County-wide strategic approach to implementing a geographically-balanced distribution of low-income and homelessness resources, projects, programs, and solutions throughout the County.
- **Action Two:** The Eureka City Manager will periodically meet with the City Managers of the other incorporated cities in the County to share information, explore opportunities for collaboration, and advocate for



a geographically balanced distribution of low income and homeless resources, projects, programs, and solutions.

Implements Policies: H-2.2, H-6.1, H-6.2, H-6.3, H-6.4, H-7.3, H-7.5

Timeframe: 2020-2027 (Action 1 to occur opportunistically as County-led planning projects take place; Action 2 to occur in even-numbered years)

Responsible Parties: City Manager and Finance

Funding: Departmental budget

IMP H-29: Support Rental Subsidy and Rental Assistance Programs

Through the Housing Authority of the City of Eureka, an independent agency with operations separate from those of the City of Eureka, households in the City are able to access Housing Choice Vouchers (formerly known as Section 8). The program provides rent subsidies to very low-income households. Prospective renters secure housing from HUD-registered landlords that accept the certificates. HUD then pays the landlords the difference between what the tenant can afford (30 percent of their income) and the payment standard negotiated for the community. While the City is not directly responsible for the administration of this program, Staff can direct residents to the Housing Authority and provide information on the program. This program consists of three on-going actions:

- Action One: Continue to refer applicants to the Housing Authority of the City of Eureka.
- Action Two: Continue to encourage local property owners to accept rental vouchers.
- Action Three: Support the County in acquiring other State/Federal rental subsidy and rental assistance programs as they become available.

Implements Policies: H-2.18, H-2.19, H-5.7, H-6.1, H-6.2, H-6.3, H-6.4

Timeframe: 2020-2027

Responsible Parties: Development Services and Finance

Funding: Departmental budget

IMP H-30: Fair Housing Information and Referrals for Tenant/Landlord Mediation

The City will continue to provide residents with fair housing services information provided by the State Fair Employment and Housing Commission. The City will also provide referrals to County/State agencies that can provide counseling and mediation between tenants and property owners, seminars, and informational activities. The City will continue to



refer fair housing complaints to the appropriate agencies/entities including the US Department of Housing and Community Development (HUD) and the State Department of Fair Employment and Housing and the City's Tenant Grievance Hearing Procedure for City-subsidized properties. The City will publish the Fair Housing Public Notice in the newspaper twice a year.

Implements Policies: H-4.6, H-6.1, H-6.2, H-6.3, H-6.4

Timeframe: 2020-2027

Responsible Parties: Development Services

Funding: Departmental budget

IMP H-31: Foreign Language Housing Materials

Approximately 13% of all persons age five and over in Eureka were reported to speak a language other than English at home according to the 2012-2016 American Community Survey. In order to ensure that all community members are able to access housing related information, including those that may have limited English language proficiency, the City will provide bilingual materials for key topics. This program calls for the City to create bilingual housing materials relating to often-discussed topics such as Accessory Dwelling Units and home-based businesses. The City will also explore the possibility of establishing and creating a City-wide Limited English Proficiency policy. Initial efforts will focus on Spanish language materials, and future efforts will expand to other languages common in the City as well as consideration for those with limited literacy that also need access to housing information.

Implements Policies: H-6.1, H-6.2, H-6.3, H-6.4

Timeframe: 2021

Responsible Parties: Development Services and Finance

Funding: Departmental budget plus General Fund costs for translating materials

IMP H-32: Support Repeal of Article 34 (Caps on Affordable Housing)

In 1950, Californians voted to amend the State Constitution to limit the amount of affordable housing that could be built in a community. It did this by allowing local communities to create a cap on the number of low-income housing units that could be built. It has come to be viewed by many as a fundamentally racist, classist response to the construction of affordable housing. A growing number of communities across the State are advocating for the repeal of Article 34. This program recommends the City take a formal stance on Article 34, calling for its repeal because it is



fundamentally contrary to the community's goal of ample, safe housing for people of all backgrounds and incomes.

Implements Policies: H-5.7, H-6.1, H-6.2, H-6.3, H-6.4

Timeframe: 2020

Responsible Parties: Development Services, Finance and City Attorney

Funding: Departmental budget

IMP H-33: Verify Consistency with State Housing Laws

Housing-related legislation is regularly passed by the State Legislature. It is critical that the City maintain local development regulations consistent with this ever-changing body of state law. This program calls for consistency checks regarding specific topics, and generally requires an on-going effort to maintain consistency with new legislation as it may be created in the future. This program consists of six actions:

- **Action One:** Verify consistency with law(s) pertaining to Emergency Shelters, specifically any buffers, and complete text amendment to remedy, if necessary.
- **Action Two:** Verify consistency with law(s) pertaining to Supportive Housing and Transitional Housing and complete text amendment to remedy, if necessary.
- **Action Three:** Verify consistency with law(s) pertaining to Navigation Centers and complete text amendment to remedy, if necessary.
- **Action Four:** Verify consistency with AB1397, a law relating to development on sites that have been identified in the parcel inventory in multiple Housing Elements and complete a text amendment to remedy, if necessary.
- **Action Five:** Verify consistency with all ADU and Junior ADU-related laws and complete a text amendment to remedy, if necessary.
- **Action Six:** Continue to stay educated on changing housing laws by reading trade magazines and attending trainings and conferences on the topic.

Implements Policies: H-6.1, H-6.2, H-6.4

Timeframe: 2020 (Actions 1, 2, 3, 4, and 5) 2020-2027 (Action 6)

Responsible Parties: Development Services and Finance

Funding: Departmental budget



IMP H-34: Affordable Housing on Publicly-owned Properties

Publicly-owned parcels present an excellent opportunity to create affordable housing. They afford a local agency the greatest degree of control to guide development in a way that meets community housing needs. Typically, an agency will release a Request for Proposals (RFP) that in effect puts the property “up for sale/lease” to an affordable housing developer. The sale or lease is subject to conditions placed on the project. For example, a property could be sold on the condition that at least 20 units of affordable housing be built on the site. Staff conducted a detailed site inventory looking for parcels that might be suitable for this purpose. These sites are listed in **Table 55** in the Technical Appendix.

There are a number of key housing objectives that the City intends to accomplish with this program:

Build 315 Units of Deed-Restricted Affordable Housing by 2028. Utilize an RFP process which will specify a minimum number and type of affordable units to be included in the proposal. All deed restrictions will be recorded.

Ensure Appropriate Unit Type (Number of Bedrooms). To ensure the deed-restricted affordable housing units created under this program meet the needs of the various household sizes found in Eureka, the RFPs will establish required proportions. The following ratios are based on existing household sizes found in Eureka (See **Table 5** in Technical Appendix). These ratios do not apply to market-rate units.

- Studio or 1-Bedroom Apartments: No more than 70 percent
- 2-Bedroom Apartments: At least 25 percent
- 3- to 5-Bedroom Apartments: At least 5 percent

Encourage Mixed-Income and Mixed-Use Developments. The RFPs will prioritize projects that include a diversity of housing units such as Affordable-by-design studios, student housing, condominiums, and/or luxury penthouses. Mixed-use components such as corner stores, ground level or rooftop bars/restaurants, or child care facilities will also strengthen the application. The most strongly weighted scoring criterion will be the overall number of housing units.

Maximize Development Potential. The RFPs will specify a minimum Floor Area Ratio (FAR) for each site to ensure that full development potential is realized. Proposals that meet the minimum unit number threshold, but not minimum FAR, will need to be augmented to be selected. Additional FAR can be achieved by adding additional affordable and/or market-rate units or office/commercial floor area.

High Quality Design. As required by the Eureka Municipal Code all development associated with this program must comply with the objective design standards contained in Section 155.312 of the Eureka inland



Zoning Code. These regulations require varying levels of architectural detail with regard to façade/roof articulation and materials. As appropriate, all projects will go before the Design Review Committee for further refinement prior to approval.

Active Transportation and Transit Focused/Reduced Green House Gas Emissions. Selected proposals will clearly indicate ways in which residents will be encouraged and incentivized to use active/collective modes of transport, such as walking, biking, transit, or car shares. Examples of this include convenient/secure bicycle parking, complimentary annual bus passes provided to each resident, or an on-site car share facility. Measures such as these will help the City meet greenhouse gas emission targets by providing the residents a realistic alternative to conventional motor vehicle usage.

The City recognizes that the success of this implementation program hinges more than anything on the ability to construct housing with little to no on-site parking spaces. Given the ample transit and nearby jobs/services, all of these proposed parking-less developments are likely to coexist harmoniously with the existing neighborhood. The specific parking exemptions/reductions are listed below and apply to all sites unless otherwise noted:

- **Deed-Restricted Affordable Units:** Deed-restricted affordable units (50 percent or less of the County AMI), are exempt from the requirement to provide on-site parking by EMC Section 155.324.020.B.3
- **Affordable-by-Design Units:** Market-rate residential units smaller than 500 square feet (i.e. Affordable-by-design) are exempt from the requirement to provide on-site parking by EMC Section 155.324.020.B.2
- **Market Rate Units:** Market-rate units are required to provide on-site parking unless otherwise exempted by EMC Section 155.324.020.B or reduced via EMC Section 155.324.040.
- **Commercial Uses:** New construction of commercial uses (e.g. offices, retail, restaurants, etc.) in the Downtown and Downtown West zone districts are not required to provide on-site parking per EMC Section 155.324.C.4.

The primary means of mitigating potential parking impacts will come via a parking management strategy in the Downtown area, as called for in the General Plan and prescribed in the Eureka Parking Management Plan. The City received a \$50,000 SB2 Planning Grant in October 2019 to complete the plan, which is estimated to be adopted by the end of 2020. This document will provide detailed analysis of existing parking facilities and needs, and contain actionable recommendations for how to make the most efficient use of existing facilities to meet the needs of Downtown visitors, residents, and workers.



Shovel Ready Projects. The City will work to identify and mitigate potential regulatory barriers that may prevent or delay the development of the sites as intended. Specifically, both CEQA and traffic will be analyzed prior to the release of the RFP and be disclosed therein.

- **CEQA:** The majority of the sites, especially the downtown parking lots, qualify for at least one of the following CEQA exemptions: Class 32 Urban Infill Exemption (CEQA Guidelines Section 15332), High Density Housing Near Transit (CEQA Guidelines Section 15195); and Affordable Housing Projects (CEQA Guidelines Section 15194).
- **Traffic:** City Engineering staff has conducted a preliminary evaluation of the proposed development sites (number of units and minimum FAR) and believe most or all traffic/parking related impacts can likely be mitigated by active/public transportation focused measures. City Engineering will evaluate each specific development proposal prior to City approval.
- **Public Parking Maintenance (Sites 1-10):** For some sites, the ground-level public parking lot will need to be maintained, i.e. the development will need to contain a ground-level parking podium. For other sites, the ground-level public parking will not need to be maintained i.e. the ground level of the building may contain housing or commercial space. The determination of whether ground-level parking will be required will be made by the City Council, on a site-by-site basis, prior to the release of the RFP.
- **Parking Assessment District.** For parking lots developed within the Parking Assessment District during the 1950s to 1960s, and on which public parking will be eliminated, the City will comply with California Streets and Highway Code § 35705. State statute provides a legal path forward for the developments proposed on Parking Assessment District lots in this Implementation Program.
- **General Plan Consistency:** The 2040 Eureka General Environmental Impact Report (EIR) analyzed the impact of the creation of up to 1,886 additional housing units in the City. 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 this program are well within the analysis contained in the adopted 2040 General Plan EIR.
- **Density Bonus Law:** The Density Bonus Law (found in California Government Code Sections 65915-55918) is a law that provides a housing developer incentives to build affordable housing. Typically, in exchange for building affordable units the developer is allowed to build more market rate units than they otherwise would. Additionally, they gain concessions and waivers that allow them relief from development standards such as parking requirements or building setbacks. Because all of the proposed developments qualify under the law, all allow the developer additional ways to overcome unexpected regulatory hurdles.



This program requires the City to issue RFPs for the creation of affordable housing on publicly-owned property, however, there is no guarantee that developers will respond to the RFP. As long as the sites remain underutilized, sites not proposed for development through the RFP process will remain available for affordable housing development. Although RFPs for the sites identified below are scheduled to be released at a certain time, all the City-owned sites are available for development at any time. Developers do not have to wait for a specific RFP process to approach the City regarding development of affordable housing on these sites.

Site 1: City Parking Lot - Sunny & Myrtle (APN 006-181-001)

- **RFP Release:** July 1, 2020
- **Site Area:** 18,286 square feet
- **Minimum Affordable Units:** 15 VLI and 5 LI
- **Minimum FAR:** 2.0 (36,572-square-foot building)

Site 2: City Parking Lot - Eighth & G (APN 001-115-500)

- **RFP Release:** July 1, 2020
- **Site Area:** 14,668 square feet
- **Minimum Affordable Units:** 15 VLI and 5 LI
- **Minimum FAR:** 3.0 (44,004-square-foot building)

Site 3: City Parking Lot - 6th & M (APN 001-233-007 and 001-233-006)

- **RFP Release:** July 1, 2020
- **Site Area:** 13,200 square feet
- **Minimum Affordable Units:** 15 VLI and 5 LI
- **Minimum FAR:** 3.0 (39,900-square-foot building)

Site 4: City Parking Lot - 3rd & E (APN 001-096-003 and 001-096-002)

- **RFP Release:** July 1, 2021
- **Site Area:** 12,600 square feet
- **Minimum Affordable Units:** 10 VLI and 10 LI
- **Minimum FAR:** 3.0 (37,800-square-foot building)

Site 5: City Parking Lot - 5th and D (APN 001-103-003)

- **RFP Release:** July 1, 2021
- **Site Area:** 13,200 square feet
- **Minimum Affordable Units:** 15 VLI and 15 LI
- **Minimum FAR:** 3.0 (39,600-square-foot building)

Site 6: City Parking Lot - 4th and G (APN 001-142-007)

- **RFP Release:** July 1, 2021
- **Site Area:** 17,600 square feet
- **Minimum Affordable Units:** 15 VLI and 10 LI
- **Minimum FAR:** 3.0 (52,800-square-foot building)

Site 7: City Parking Lot - 5th and H (APN 001-142-005)



- **RFP Release:** July 1, 2022
- **Site Area:** 13,200 square feet
- **Minimum Affordable Units:** 15 VLI and 5 LI
- **Minimum FAR:** 3.0 (39,600-square-foot building)

Site 8: Portion of Cooper Gulch (APN 006-021-006)

- **RFP Release:** July 1, 2022
- **Site Area:** 19,792 square feet
- **Minimum Affordable Units:** 15 VLI and 5 LI
- **Minimum FAR:** No minimum
- **Additional Action:** City will begin the process to rezone/upzone the site to accommodate the proposed development no later than January 1, 2022.

Site 9: City Hall Parking Lot - 5th Street (APN 001-192-001)

- **RFP Release:** July 1, 2023
- **Site Area:** 13,200 square feet
- **Minimum Affordable Units:** 15 VLI and 5 LI
- **Minimum FAR:** 3.0 (39,600-square-foot building)

Site 10: City Hall Parking Lot - 6th Street (APN 001-192-004)

- **RFP Release:** July 1, 2023
- **Site Area:** 13,200 square feet
- **Minimum Affordable Units:** 15 VLI and 5 LI
- **Minimum FAR:** 3.0 (39,600-square-foot building)
-

Site 11: Broadway and McCullen (DOT Surplus) (008-112-031)

- **RFP Release:** Not applicable
- **Site Area:** 7,300 square feet
- **Minimum Affordable Units:** 7 VLI
- **Minimum FAR:** No minimum
- **Additional Action 1:** City will contact the Department of General Services and Caltrans no later than July 1, 2021, to offer ongoing regulatory assistance in the development of the site for Very Low Income Housing, potentially as a supportive housing facility for the formerly houseless.
- **Additional Action 2:** City will begin the process to rezone/upzone the site no later than January 1, 2022.

Site 12: Sheriff's Woodlot (013-101-006 and 013-111-003)

- **RFP Release:** Not applicable
- **Site Area:** 111,308 square feet (2.5 acres)
- **Minimum Affordable Units:** 40 VLI and 40 LI
- **Minimum FAR:** No minimum
- **Private Parking:** This site is large enough to provide a substantial number of on-site parking spaces to serve the residents.
- **Additional Action 1:** City will contact the County of Humboldt no later than July 1, 2020, to request the site be developed as affordable housing.



- **Additional Action 2:** City will provide ongoing regulatory assistance to see this accomplished, including assistance in relocating the firewood production facility.
- **Additional Action 3:** City will begin the process to rezone/upzone the site no later than June 1, 2022, pending support from the County of Humboldt.

Implements Policies: H-2.19, H-6.1, H-6.2, H-6.3, H-6.4, H-7.2

Timeframe: 2020-2027

Responsible Parties: Development Services and Finance

Funding: Departmental budget

IMP H-35: Implementation Program Monitoring

On-going monitoring of Housing Element Implementation Programs is important to gauge the success of the programs. This program would call on staff to establish internal reporting procedures to record various housing creation-related metrics. This data would be used to identify ways to make the programs more effective. If adequate progress toward housing creation is not made by 2023, Implementation Programs would be reviewed to identify opportunities for improvement or change.

- **Action One:** Track housing creation, loss, and affordability levels for building permits (date applied and date issued), and occupancy certificates.
- **Action Two:** Implementation Program review will be conducted at the planning cycle mid-point (2023) to evaluate effectiveness of Implementation Programs. Amendments to the Housing Element may be made based on the findings of the review, including rezoning pursuant to Government Code 65583.2.h-l to accommodate all remaining RHNA for lower-income households within five years of the beginning of the planning period.

Implements Policies: H-1.1, H-1.3, H-1.6, H-1.11, H-1.12

Timeframe: 2020-2027 (Actions 1 and 2) 2023 (Action 3)

Responsible Parties: Development Services and Finance

Funding: Departmental budget

