City of Blue Lake

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Blue Lake, CA 95525
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PLANNING COMMISSION MEETING AGENDA

Monday, November 18, 2024 @ 7:00 P.M.
Skinner Store - 111 Greenwood Road, Blue Lake

This meeting will be held in person at the location listed above. The City will provide alternative methods of participation for the convenience of the public. However, the City does not guarantee that there will not be technological issues or interruptions. The public is hereby notified that if there is a technological issue with live video streaming of the meeting, the meeting will continue in person as scheduled. The public may access and participate in the public meeting using one or more of the following methods:

A) **Zoom:** The meeting will be live streamed via Zoom (details below). The direct Zoom link will also be posted on the City of Blue Lake website (https://bluelake.ca.gov/). During the meeting, public comment may be made by using the raise hand feature on Zoom.

Public input will be facilitated by Zoom at the following meeting link:
https://us02web.zoom.us/j/87504927907?pwd=kTJLrla4rkLVgsfxwjIo0dAEzqfGL7.1
Meeting Id: 875 0492 7907 Passcode:983858

B) **In-Writing:** Public comments may also be made in advance by submitting written comment via citymanager@bluelake.ca.gov or by filing it with the City Clerk at 111 Greenwood Road, Blue Lake, California, 95525. All public comments (via email or mail) must be received by the City Clerk prior to 4:30 p.m. the day of the meeting. Please identify the meeting date and agenda item to which your comment pertains in the subject line. Public comments, so received, will be forwarded to the Planning Commission. Written public comments will not be read aloud during the meeting.

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1. **Approval of Minutes: October 28, 2024 Special Meeting**

2. **Public Input –** *The Public is invited to present petitions, make announcements, or provide other information to the Planning Commission that is relevant to the scope of authority of the City of Blue Lake that is not on the Agenda. The Planning Commission may provide up to 15 minutes for this public input session. To assure that each individual presentation is heard, the Planning Commission may uniformly impose time limitations of 3 minutes to each individual presentation. The public will be given the opportunity to address items that*

are on the agenda at the time the Planning Commission takes up each specific agenda item.

3. Approval of Agenda

Discussion / Action:

4. Action: Vote on Chair and Vice-Chairman.

5. Public Hearing/Action: Planning Commission recommendation to the City Council regarding adoption of a CEQA Negative Declaration and amendment of the General Plan Housing Element for the 2019-2027 Housing Element planning period (6th cycle) to comply with State Housing law.

6. Discussion: Receive presentation from City staff regarding potential development of a portion of the former Blue Lake Power site for battery storage.

7. Miscellaneous Planner Items.

8. Upcoming Planning Commission meetings for the next 3 months will be on December 16, 2024, January 20, 2025, and February 17, 2025.

9. Adjournment by 9:00 pm unless extended by the Planning Commission.

A request for disability-related modification or accommodation, including auxiliary aids or services, may be made by a person with a disability who requires a modification or accommodation in order to participate in the public meeting, by contacting City Manager Amanda Mager, (707) 668-5655, at least 24 hours prior to the commencement of the meeting.

City of Blue Lake

Planning Commission Special Meeting Minutes

Oct 28, 2024

Quorum Established: Commissioners Present: Cseh, Hogan, Schang, Iaasc
Absent: Commissioner Pryor
Staff Present: Garry Rees, Mandy Mager, Tonie Quigley, Leanna Brotherton
Public Present: Marty Granger, Kat Napier, Lisa Hoover, Jon Sawatzky, Elise Scafani, Lori Ponte, Julie Christie, Nona, Becki Thornton, Jeff Landon, Jean Lynch, Justin Goad

Meeting Called to Order: 7:04PM
Quorum Established

1. **Approval of Minutes with date corrected – Sept 16, 2024**
   Motion to Approve: Cseh
   Seconded by: Schang
   Public Comment:
   Julie Christie: Commented that not enough detail in public comments section of meeting minutes.
   Motion Summary: Consensus

2. **Public Comment:**
   Lori Ponte: Requests that a commission representative attend the monthly Council meeting to provide updates on commission activities; questions Commissioner Schang's residency status.
   Julie Christie: Comments on the comment timer not being accessible to Zoom viewers; comments on the truck route and concerns regarding the bulb outs, damage to the boulevard and truck turning safety; supports Lori Ponte's comments.
   John Sawatzky: States that the concrete brick divider on Greenwood is slippery when wet.
   Commissioner Hogan notes that Commissioner Matt Isaac has joined the meeting midway through the public comment period; four commissioners are now present.
   Jean Lynch: Asks if the question regarding Commissioner Schang not living in BL was going to be answered.

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Commissioner Hogan: States that public comment is not a time for back-and-forth conversation. It's a time for commissioners to take information from the public, and if the commissioners choose, they can direct staff to bring back information for a later date.

3. **Motion to Approve the Agenda as Presented**:
   Motion by: Cseh
   Seconded by: Schang
   Public Comment:
   Julie Christie: Asks if the Climate Action Plan will be on tonight's agenda.
   Motion Summary: Consensus

4. **General Plan Housing Element Update:** Presentation from staff on the Draft California Environmental Quality Act (CEQA) Negative Declaration prepared for the Housing Element.
   Commissioner Hogan: Introduces the item.
   Planner Garry Rees: Presents the staff report. Staff is providing an update and opportunity for the commission to ask questions about the proposed Negative Declaration for the Housing Element. In 2023, a final draft was developed and submitted to HCD for review; in September of 2023, HCD reviewed the draft and determined that Blue Lake needs to implement Program HI-14 after adoption of the element update in order for HCD to certify the Housing Element. Staff has completed the CEQA initial study and is making a recommendation of a Negative Declaration. Staff has conducted a plan level review; this is not a project specific review. Staff has analyzed what the plan proposes, not the implementation of an action. It is very common to do an initial study and adopt a negative declaration for a Housing Element Update. Project specific review is triggered by a discretionary action; if no exemption fits the project description, then an initial study is developed for the project. The proposed combining zone program does not preclude local, State and Federal regulations; these are still followed and staff determines through the building referral process which issues need to be addressed and by whom; this may trigger referral to State and federal agencies. As part of the CEQA process, the document is sent out to the State Clearinghouse, noticed throughout the community and publicly advertised. People can provide comments up until the point at which the City Council considers the adoption of the Housing Element. Correspondence was received from the Water Board, Kent Sawatzky, and Lisa Hoover.
   Commissioner Schang: Asks staff what are the benchmark deadlines for the process of adopting the housing element and does this set the City up for future cycles.
   Planner Rees: December 2024 is a deadline for several of the implementation programs in the element update; the DANCO project is also relying on the City having an adopted and certified housing element in order to be eligible for certain State funding. The City will continue to be required to update the housing element and will be subject to on-going allocations for housing development in future planning cycles. The adoption of

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the element brings the City into compliance and future elements will be updated rather than completely rewritten.

Public Comment:

Lisa Hoover: Reads the letter she sent to the Commission; concerned about the adoption of a negative declaration and how it impacts projects and local control.

Julie Christie: States that she wants the housing element to be consistent with the City's General Plan; comments on the public comment process.

Jean Lynch: States her concerns about the circulation element and Greenwood Road impacts.

Lori Ponte: Requests more public education on zoning and by-right zoning; it's not possible for everyone to attend the meetings and not everyone understands the issues.

Kat Napier: States that she has just begun to delve into all the information and would like to look at circulation issues. Tells the Commissioners to learn as much as they can.

Public Comment Closed.

Commissioner Hogan: Asks Planner Garry Rees to explain more about plan level CEQA review and project specific review . What would be the difference between how a project would be addressed now versus when the element is adopted?

Planner Rees: Planner Rees that a plan level review analyzes goals, policies, and programs as the project description. In contrast, a project level review analyzes a specific development proposal on a specific site. Explains that by-right zoning- creates a new zoning tool, this zone could be overlayed upon a specific property; this would allow a density level prescribed by the State and would bring the City into compliance with State mandates. These properties are already zoned for development and by-right zoning still mandates that the project is developed consistent with the City's adopted zoning regulations.

Commissioner Hogan allowed additional public comment:

Julie Christie: Comments on the public comment process.

Jean Lynch: Questions the effects of vacation rentals on housing in the City.

John Sawatzky: States that there are a lot of people that will make money on this; and asks the commissioners to not make a quick decision.

Elise Scafani: States that she is on the Council but is not acting as a Councilmember; recommends that a town hall meeting be held to learn about the housing element.

Additional Public Comment Period Closed.

Commissioner Hogan**:** Asks the commission if there are any further questions or directions for Planner Garry Rees. The next step will be a public hearing as identified in the staff report at the regular scheduled November meeting on Nov. 18,2024

5. **Review City of Blue Lake Housing Needs Video (REAP Funded project):**
Discussion/Presentation.

City Manager Mandy Mager: The City Manager presents the item; the video was funded by the Regional Early Action Planning Grant; this funding is to support housing development and to bring awareness to housing issues in communities. The City chose to produce a video and worked with HCAOG staff to procure the services of a videographer. The video is reviewed by the Commission and the public in attendance.

Public Comment:

Jeff Landon: States that the video is a marketing pitch to push an agenda.

John Sawatzky: States that the video is well made, but felt that the special meeting was generated to push this project through before the end of year.

Julie Christie: Comments on the REAP funding; states that the funding was Rural Energy Agriculture funding to support farmers; questions where the money is going and states that housing is not impacting school enrollment.

Lori Ponte: States that she saw the video a month ago; the video was well done and she does not have issues with the DANCO affordable housing project; appreciates the comments from the people in the video.

Jean Lynch: States that the video brought up a lot of thoughts; she owns a bigger home and she's not interested in giving it up for someone else; comments that annexation was a missed opportunity and she has experience living in a live/work situation.

Kat Napier: States that she appreciates the quality of the video, but all of the people that spoke were business owners; should listen to people that have lived here; she's not against housing, but she wants to preserve the town character.

6. **Discussion: Regional Climate Action Plan (CAP).** Presentation from staff on the status of the Regional CAP.

Commissioner Hogan**:** Introduces the item**.**

Planner Garry Rees: Presents the staff report. Planner Rees presents an overview of the CAP and estimated timelines for preparing the CEQA EIR and adoption of the CAP.

Public Comment:

Julie Christie: Comments on the CAP presentation by the County; it can be viewed on Humboldt Access; people should watch what other cities doing. Comments on energy infrastructure on Taylor Way.

Public Comment Closed.

Commissioner Hogan: Stated that housing/zoning seems to be meeting a lot of the CAP strategies.

7. **Miscellaneous Planner Items:**

Planner Garry Rees: Discusses the revised submittal anticipated to be received for the DANCO project; it is expected that a full submittal will be presented at the end of the month. State and Federal agencies have been consulted through the referral process and a completeness review will be conducted once the revised submittal is received.

The CEQA process is ongoing and the CEQA document will be sent out for a 30-day comments period once prepared.

8. **Upcoming Planning Commission meetings for the next 3 months:**
   November 18, 2024, December 16, 2024 and January 20, 2025
   Commissioner Schang: Will be unavailable in November.
   Commissioner Hogan: Will be unavailable in December.

9. **Motion to adjourn**:
   Motion made by: Commissioner Schang
   Seconded by: Commissioner Cseh
   Motion Summary: Consensus
   Meeting adjourned at 9:03pm

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CITY OF BLUE LAKE

Post Office Box 458 • 111 Greenwood Road • Blue Lake, CA 95525
Phone 707.668.5655 Fax 707.668.5916

November 18, 2024

TO: Blue Lake Planning Commission

FROM: Garry Rees, City Planner

RE: <u>Agenda Item 5 – Public Hearing/Action</u>: Amendment of the General Plan Housing Element for the 2019-2027 Housing Element planning period (6th cycle) to comply with State Housing law.

State law requires cities in Humboldt County to update their General Plan Housing Elements approximately every 8 years, which is referred to as a Housing Element planning cycle. The current cycle is for the 2019 - 2027 planning period (6th cycle). The City received funding from the California Department of Housing and Community Development (HCD) through the Local Early Action Planning (LEAP) and Regional Early Action Planning (REAP) grant programs to update its Housing Element for the 6th cycle to achieve compliance with State housing law. Since receipt of the first grant funds in 2021, City staff has worked with the Planning Commission on updating the General Plan Housing Element, which has included discussions at numerous Commission meetings, several public hearings, interviews with community stakeholders, and presentations at two town hall meetings.

Included as **Attachment 1** to this staff report is the Draft Housing Element Update, which includes an analysis required by State law related to: 1) a review of past accomplishments under the last Housing Element update adopted by the City; 2) existing demographics and housing characteristics; 3) land, financial, and administrative resources available to meet housing demand; and 4) market, government, and environmental constraints.

The Humboldt County Association of Governments (HCOAG), a regional planning agency, is responsible for allocating the Regional Housing Need Assessment (RHNA) to individual jurisdictions within the County. The RHNA is distributed by income category. The City of Blue Lake has been allocated a RHNA of 23 dwelling units (7 very low, 4 low, 5 moderate, and 7 above moderate income units) for the 2019-2017 planning period (6th cycle). The City also has a carryover of 11 dwelling units from the 2014-2019 planning period (5th cycle). Therefore, the City must plan for both its 5th and 6th cycle RHNA in the 6th cycle Housing Element. The Housing Element Update itself does not create physical residential growth in the City. The City must ensure the availability of residential sites at adequate densities and appropriate development standards to accommodate the RHNA. The Draft

Housing Element Update identifies available sites for residential development during the 2019 - 2027 planning period (6th cycle), which exceed the City's RHNA allocation, including sites located within the Powers Creek District (see **Attachment 1**).

The Draft Housing Element Update also includes programs that propose amending the City's Zoning Code for the following reasons: 1) to ensure consistency with current State housing law; 2) to create a Multi-Family Combining Zone to allow multi-family projects without discretionary review or by-right at a density of 16 units per acre; 3) to remove potential constraints to the development of multi-family housing; 4) to comply with the requirements for objective design standards in Government Code Section 65589.5, subdivision (f); and 5) to minimize the potential for confusion regarding the applicability of the City's design guidelines (see **Attachment 1**).

On September 20, 2023, the City received a determination letter from HCD reporting the results of their review of the City's 6th cycle Draft Housing Element Update (see **Attachment 2**). The letter concluded that the revised draft element meets the statutory requirements of State Housing Element law, with the following exception:

> "*Generally, pursuant to Government Code section 65584.09, if a city did not make available sites to accommodate the regional housing need allocation (RHNA), then the city shall, within the first year of the planning period of the new element, rezone adequate sites to accommodate the unaccommodated portion of the RHNA from the prior planning period. The City has an unaccommodated need from the prior planning period (Table 20). Since more than a year has lapsed from the beginning of the current planning period, the element cannot be found in compliance until the required rezoning is complete. Specifically, the element cannot be found in compliance until Program HI-14 (Rezoning and By Right Procedures) is implemented to meet the unaccommodated need from the 5th cycle RHNA. Once the rezoning has been completed, the City should submit documentation (e.g., resolution, ordinance) to HCD and HCD will review and approve the element in accordance with Government Code section 65585*."

Additionally, pursuant to Government Code Section 65583.3, the HCD review letter stated that the City must submit an electronic sites inventory with its adopted Housing Element. This is similar to the sites inventory contained in the element update but must be provided in the electronic form required by HCD after the City has adopted its element.

After receiving the review letter from HCD instructing the City to move forward with adoption of its Draft Housing Element Update, City staff prepared a California Environmental Quality Act (CEQA) Initial Study (IS) for the element update. The Draft IS was completed on September 23, 2024, which is included as **Attachment 3** to this staff report. As discussed in the Draft IS, the project description analyzed in the document is the updated policies and programs proposed by the Housing Element Update. As concluded in the Draft IS, it is found that implementation of the Housing Element Update would not have a significant effect on the environment. Therefore, it is recommended by City staff that a Negative Declaration is the appropriate CEQA determination for adoption of the Housing Element Update.

As required by CEQA Guidelines Sections 15073(d) and 15105(b), the CEQA document prepared for the project was sent to the State Clearinghouse (SCH#: 2024091022) for a 30-day circulation period. The circulation period began on 9/26/24 and ended on 10/27/24. As required by CEQA Guidelines Section 15072(a), a 'Notice of Intent to Adopt a Negative Declaration' was submitted to the State Clearinghouse, posted in 3 public places in the city, and filed with the County Clerk-Recorder's Office prior to the beginning of the circulation period. The CEQA document was also posted on the City's website prior to the beginning of the circulation period at the following link: https://bluelake.ca.gov/2024/09/23/initial-study-for-blue-lake-2019-2027/. Comments that have been received on the Draft IS to date are included as **Attachment 4** to this staff report. Based on the comments received, minor revisions were made to the Draft IS. Additions made to the Draft IS are shown in underlined and bolded **text** and deletions are shown with ~~strikethroughs~~.

Since HCD has determined the Draft Housing Element Update is ready for adoption and the CEQA document has been circulated for public comment, the next step in the process is for the Planning Commission to make a recommendation to the City Council regarding adoption of the element update. Attached to this staff report is Resolution No. 2-2024, which contains the findings for the Planning Commission's recommendation to the City Council for adoption of the element update (see **Attachment 5**). Exhibit "A" to the resolution is the Draft 2019-2027 Housing Element Update. In addition to making a recommendation regarding adoption of the element update, the Planning Commission must also make a recommendation for an environmental determination under CEQA. As noted above, City staff is recommending that a Negative Declaration is the appropriate CEQA determination for adoption of the element update.

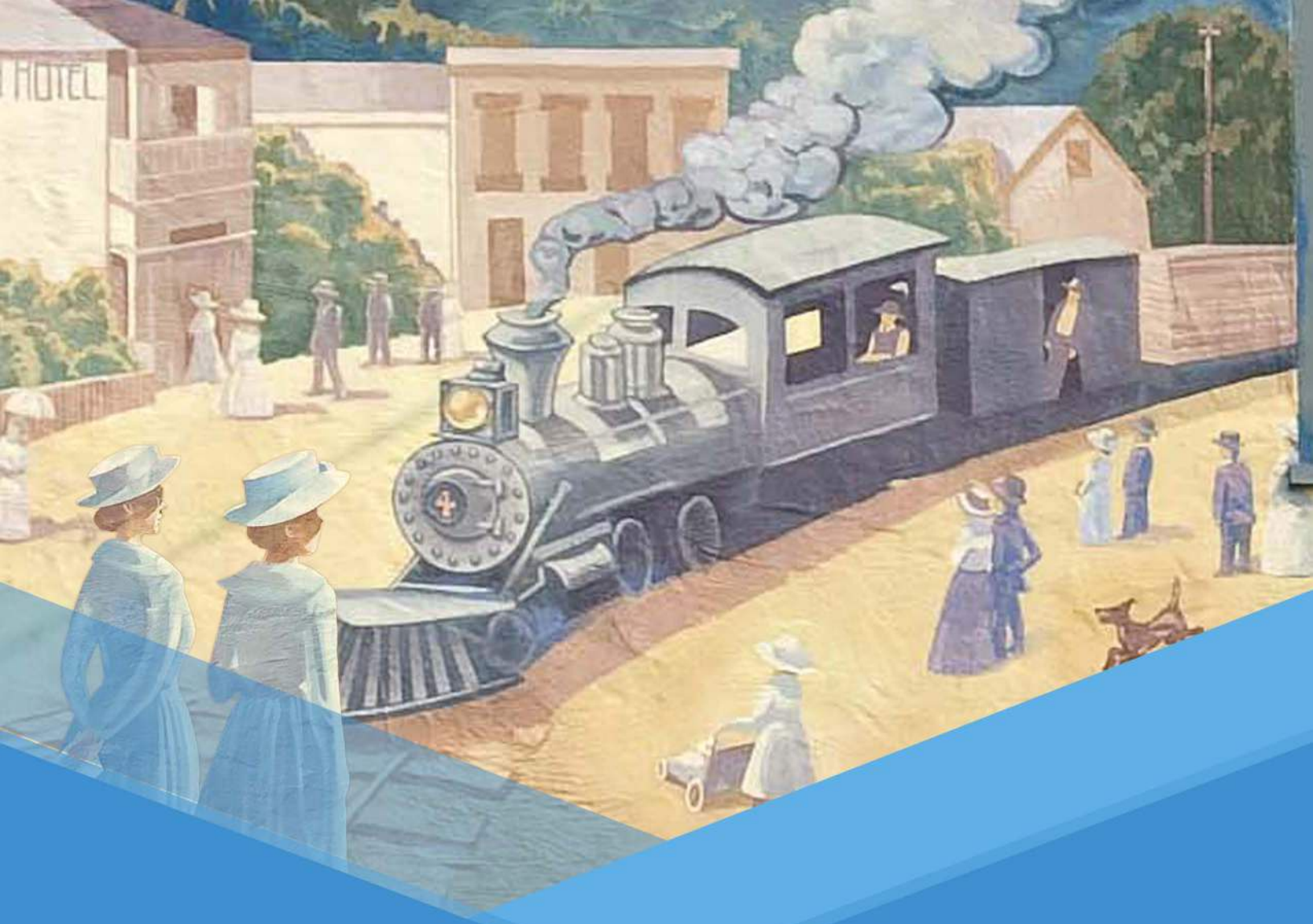
Once the Planning Commission makes a recommendation to the City Council, the next step is for a public hearing to be held by the City Council where they will review the recommendation from the Planning Commission and consider adoption of the CEQA Negative Declaration and Housing Element Update. The public hearing before the City Council is tentatively scheduled for a special meeting on December 10, 2024.

RECOMMENDATION:

1) Receive a presentation from City staff on the City's Draft General Plan Housing Element Update and CEQA Negative Declaration.
2) Open the public hearing and receive public testimony.
3) Close the public hearing.
4) Discuss the Draft General Plan Housing Element Update and ask questions of City staff.
5) Adopt Resolution No. 2-2024 recommending adoption of the amendment of the General Plan Housing Element for the 2019-2027 planning period (6th cycle).

Attachment 1

City of Blue Lake Draft General Plan Housing Element Update for the 2019-2027 Planning Period (6th Cycle)



City of Blue Lake

HOUSING ELEMENT

2019 - 2027 UPDATE

City Council Adopted _____ 2024

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Introduction

Purpose

The purpose of the Housing Element is to identify housing solutions that solve local housing problems and to meet or exceed the Regional Housing Needs Allocation. The City recognizes that the provision of adequate housing is best met through various resources and interest groups. This element establishes the local goals, policies, and programs the City will implement and/or facilitate to address the identified housing issues.

State law requires the Housing Element to be consistent and compatible with other General Plan elements. The Housing Element should provide clear policy direction for making decisions pertaining to zoning, subdivision approval, housing allocations, and capital improvements. State law (Government Code Sections 65580 through 65589) mandates the content of the Housing Element and requires an analysis of:

- Population and employment trends;
- The City's fair share of the regional housing needs;
- Housing stock and household characteristics;
- An inventory of land suitable for residential development;
- Governmental and non-governmental constraints on the improvement, maintenance, and development of housing;
- Special housing needs;
- Opportunities for energy conservation; and
- Publicly assisted housing projects that may convert to market rate housing projects.

The purpose of these requirements is to develop an understanding of the existing and projected housing needs within the community and to set forth policies and schedules promoting the preservation, improvement, and development of diverse housing types available at a range of costs.

General Plan Consistency

The City of Blue Lake General Plan provides goals relating to protection and utilization of resources, development consistent with service levels, and constraints to development. Any proposed land use must be compared with the entire General Plan to determine if the project is consistent with the basic land use designation and does not adversely affect an overlaying constraint. The Introduction to the General Plan lists the locations of all components of the General Plan. The General Plan establishes both opportunities for development and constraints against development.

The Housing Element update has been analyzed for consistency with the City's General Plan and does not propose any goals, policies, or programs that are considered contrary to General Plan goals, policies, and programs. No changes are proposed to the existing General Plan land use designations. The City will review and revise the Housing Element as necessary for consistency when amendments are made to the General Plan.

Regional Housing Needs Allocation

The Humboldt County Association of Governments (HCAOG) is a Joint Powers Authority (JPA). Membership includes Humboldt County and the cities of Arcata, Blue Lake, Eureka, Ferndale, Fortuna, Rio Dell, and Trinidad. As directed in State Government Code Section 65584, the Department of Housing and Community Development (HCD) determines the existing and projected housing need for distinct regions in the state. In consultation with HCD, HCAOG is required to adopt a Regional Housing Needs Plan (RHNP) that allocates a share of the regional housing need to each city and county. The 8-year projection period begins December 31, 2018 and ends August 31, 2027.

Listed below in **Table 1** is the breakdown of the RHNA for the City of Blue Lake, by income group, for the 2019–2027 period.

Table 1: Future Housing Needs, 2019–2027

Income Category	2019–2027 RHNA
Very Low	7
Low	4
Moderate	5
Above Moderate	7
Total	**23**

Source: California Department of Housing and Community Development

Data Sources

In preparing the Housing Element, various sources of information were used. The City relied on the US Census, American Community Survey (ACS), California Department of Finance, and other local sources as available.

The US Census, which is completed every 10 years, is an important source of information for the community profile. It provides the most reliable and in-depth data for demographic characteristics of a locality. The ACS is conducted by the US Census Bureau and provides estimates of numerous housing-related indictors based on samples averaged over a five-year period. The Housing Needs Assessment reflects the data provided from HCD and the 2015-2019 ACS data. It should be noted that the ACS data can have a large margin of error for a community as small as Blue Lake, so the data may not always be accurate.

The California Department of Finance is another source of valuable data and is more current than the census. However, the Department of Finance does not provide the depth of information that can be found in the US Census Bureau reports. Whenever possible, Department of Finance data and other local sources were used in the Housing Needs Assessment in order to provide the most current profile of the community.

Public Participation

The California Department of Housing and Community Development requires that local governments make a diligent effort to achieve the public participation of all economic segments of the community.

During the Housing Element update process, the City of Blue Lake made diligent efforts to reach all segments of the community. Public input on housing needs and strategies is critical to developing appropriate and effective City housing programs. The City elicited public participation by posting notices in public locations around town and by contacting service providers (specifically representing lower-income households), local real estate agents, developers, housing needs advocacy groups, and other stakeholders.

All segments of the community were encouraged by the City to participate in the preparation of the Housing Element through a combination of general public notices and direct contacts with organizations serving low-income and special needs groups. The City also informed each group that the draft Housing Element has been submitted to HCD and to ask for input and feedback.

- Blue Lake Chamber of Commerce
- Blue Lake Elementary School
- Dell'Arte International – School of Physical Theatre
- Humboldt Association of Realtors
- Wiyot Tribe
- Blue Lake Rancheria
- Blue Lake Community Resource Center
- Housing Humboldt
- Adult Day Health Care of Mad River
- Mad River Old Crows/LOLAS

Limited input was received from the above groups that was informative for the data and analysis in the Housing Element update with the exception of the Blue Lake Community Resource Center. As part of the City's public outreach efforts, the City conducted an interview with the Coordinator of the Blue Lake Community Resource Center (Molly Homen) to discuss the Housing Element Update and the needs of low-income and special needs populations in the community. The Resource Center, which is the primary entity that provides social services in the City, is a partnership between St. Joseph Health System, Blue lake Family Resource Center, and First Five Humboldt. Some of the resources provided by this organization includes:

- Information and Access to Community Resources
- Housing Application Assistance
- Employment Information & Assistance with Applications
- Food Pantry & Hygiene Supplies Closet
- Clothing for adults and children, including diapers
- Bus Passes
- Senior Health Clinics
- Medical & Dental Referrals
- Healthy Families Insurance Applications

In the interview with the Resource Center Coordinator, Ms. Homen indicated the following:

Population Served: The Resource Center provides services to persons of all income levels with the most common groups being young families with children, seniors, and houseless persons. Although certain programs they

administer have income requirements, they do have services that are available to all income levels. The Blue Lake Resource Center is very popular in the Humboldt Bay region and often serves people coming from surrounding communities (e.g., Glendale, Fieldbrook, McKinleyville, Arcata, and Eureka) in addition to residents in the Blue Lake area. The most common services provided by the Resource Center are their food programs, including a monthly food distribution, mobile produce days, and emergency food baskets (provides 3- to 4-day supply of food). The monthly food distribution event commonly serves between 80-130 households.

Homeless Population: The homeless population that is served by the Resource Center includes persons that live in the Blue Lake area as well as persons traveling through the area. The homeless persons living in Blue Lake are residing on private property (invited and uninvited), living in vehicles, or have established camps along the Mad River. Homeless persons inquiring about shelter are commonly referred by the Resource Center to the facilities managed by the Arcata House Partnership and Eureka Rescue Mission. During extreme weather events in the past, the Humboldt County Department of Health & Human Services has coordinated transportation for homeless persons to local emergency shelters.

Housing Needs: The Resource Center receives a lot of calls about the availability of affordable housing in the Blue Lake area. Because there is no affordable housing available in the Blue Lake area, the Resource Center staff typically refer people to the Housing Authority of the City of Eureka and County of Humboldt. Unfortunately, the availability of affordable housing in the Humboldt Bay region is limited, so wait times can be very long to get into this type of housing. Additionally, because there is generally not rental housing available in Blue Lake, the Resource Center does not maintain a list of available rental units. Affordable housing of all types is needed in the Blue Lake area, including subsidized multi-family housing, ADUs/JADUs, mobile/manufactured homes, tiny homes, etc. There are a number of rental units in the Blue Lake area in substandard condition. Renters are often hesitant to request improvements from their landlords for fear that their rent will be increased, or they will be evicted.

Fair Housing Issues: The Resource Center has been notified about some fair housing issues in the community including discrimination. The Resource Center staff typically refers people to the Legal Services of Northern California office in Eureka for assistance with fair housing complaints.

Service Needs: Some of the more significant service needs in the Blue Lake area include the following: 1) better access to public transit; 2) day care services for young families; and 3) health care services.

Employment Needs: There is a lack of employment opportunities in Blue Lake. The Resource Center receives inquiries about available jobs in the area and typically sends people to other communities in the Humboldt Bay region for employment referrals (e.g., McKinleyville, Arcata, Eureka).

The draft Housing Element was available for review on the City's website and hard copies were available at City Hall, the Blue Lake Community Resource Center, Blue Lake Elementary School, and the Blue Lake Library during the entire update process. The availability of the draft Element at these locations provided ample opportunity for all economic segments of the population to have access to the element. Although available upon request, the City did not receive any requests for translation services during the update process.

Joint City Council and Planning Commission Meeting

On May 11, 2021 City staff presented the Housing Element update and Zoning Ordinance Amendments scope of work and schedule to the City Council and Planning Commission and requested feedback. The primary comments and questions received at the meeting included the following:

- Several individuals inquired what the consequences would be if the City did not update its Housing Element to comply with State housing law.
- Concern was expressed about multi-family development that is out of scale/character with the predominantly single-family character of the City.

- Some members of the public expressed support for affordable housing in the City, while others expressed concern about potential impacts to the community.
- Some members of the public inquired how quickly affordable housing could be constructed in the City.
- Some members of the public indicated they wanted Blue Lake to maintain a rural character and not further develop like surrounding communities including Arcata and McKinleyville.
- Several members of the City Council and Planning Commission indicated support for updating the City's Housing Element to comply with State housing law.

Planning Commission Hearings

The City held Planning Commission hearings on March 14, 2022, March 21, 2022, April 18, 2022, and May 23, 2022 where the draft was presented for review and comment.

Draft Housing Element 30-day Public Comment Period

The City noticed the availability of the draft Housing Element Update for a 30-day public comment period, which began on April 12, 2022 and ended on May 12, 2022. Comments were received from several persons in the community, which are discussed further below.

Comments Received

Public comments were received on the Housing Element update from the following persons and organizations:

- Lisa Hoover
- Patty Johnson
- Barbara Lane
- Jean Lynch
- Ron and Julie Perry
- Elise Scafani
- Scott Toyama
- Matt Watts

The primary comments received on the Housing Element update included the following:

- Several commenters requested that a new CEQA Initial Study be prepared for the 6th Cycle Housing Element Update instead of an Addendum to the Initial Study-Mitigated Negative Declaration (IS-MND) for the 3rd Cycle Housing Element Update. Some of the comments on this issue identified specific sections of the Initial Study that should have updated information for current conditions in the City (e.g., transportation, public services, utilities and service systems, noise, air quality). Additionally, some of the commenters noted that the prior IS-MND did not address creation of the Residential High Density Combining Zone, which is Implementation Program HI-14 in the draft Housing Element Update.
- Several commenters requested that the Housing Element Update and an updated CEQA document address specific development projects that may occur in the future. The comments primarily focused

on a potential mixed-use project in the Powers Creek District that could occur on property owned by the City. The preliminary concept for the project is 40 residential units and approximately 20,000 s.f. of commercial and/or light manufacturing.

- General concern about additional residential development and resulting impacts of growth including traffic, crime, noise, lighting, air pollution, strain on infrastructure and utilities, and reduced response times for police and fire services.
- One commenter requested additional information in several sections of the Housing Element Update related to the following:
    - Additional discussion regarding plans for addressing the inadequate stormwater infrastructure in the City.
    - Clarification of the difference between the quantified objectives in Table 2 and the RHNA allocations in Tables 19 and 20.
    - Explanation of how multi-family development that could be developed in the Powers Creek District under the Opportunity zone is consistent with General Plan policies related to maintaining the existing small-town character of the community.
    - Explain why proposed implementation programs contain programs that are not specific to accelerating housing production such as those that related to improving the economy and increasing revenue.
    - What is meant by "by-right" or "without discretionary review."
    - Could the City provide adequate sites for housing on smaller parcels (that would support 1 to 4 units) and not need to allow high-density development in the Powers Creek District.
    - What is the meaning of the number of units in Table 23 (Comparison of Regional Growth Need and Residential Sites) and what is/where is the surplus housing.
    - Provide information about the source of funding for infrastructure upgrades to support future housing development.
    - Given the flood hazards in the City, why would the City plan for high-density housing in the Powers Creek District.

Based on the comments received from the public, the following revisions were made to the Housing Element update:

- Table 2 (Quantified Objectives, 2019-2027; pg. 20) was amended to be consistent with the 2019-2027 RHNA allocation instead of a "reasonable expectation" based on the residential development that has occurred in the past Housing Element planning periods.
- The discussion on page 57 was amended to add a discussion of the City's plans for studying its stormwater system to identify needed improvements and the plans to develop a stormwater ordinance to require the onsite management of stormwater runoff.
- The discussion on page 59 was amended to discuss the Emergency Action Plan for the potential failure of Matthews Dam, which is located upstream of the City at the top of the Mad River watershed.
- Table 23 (Comparison of Regional Growth Need and Residential Sites; pg. 55) was amended to fix several typos.

City Council Hearings

The City also held City Council hearings on _____ ___, 2024 where the Planning Commission recommendation on the Housing Element update was presented for review and comment.

Housing Goals, Objectives, and Programs

The City's goals, policies and objectives are intended to accomplish the broad State housing goals and requirements as appropriate for Blue Lake's particular needs and circumstances. The format and organization of the goals and policies of the City's Housing Element are slightly different than the other chapters of the General Plan. Rather than there being a set of policies for each goal, all the goals and policies are grouped together because most of the policies are applicable to multiple goals.

Goal HG-1: Assure adequate, safe, cost-effective and energy efficient housing opportunities for all segments of the community, while maintaining the quality living environment and rural character of Blue Lake by planning for and enabling the development of balanced residential neighborhoods with access to affordable housing, community facilities, and public services.

Community Housing Policies

HP-1.1 Review all new residential development to be consistent with the existing small-town character of the community and blend with existing development, as well as to ensure sustainability and environmental protection.

HP-1.2 Encourage multi-family developments on larger lots (>1 acre) in the Mixed-Use (MU), Opportunity (O), and Planned Development Residential (PDR) zones.

HP-1.3 Revise the Municipal Code to allow manufactured housing to be permitted on sites where single-family dwellings would otherwise be allowed.

HP-1.4 Promote conservation and improvement of the existing housing stock, with emphasis on older structures. Specific areas of concern include energy efficiency, electrical wiring, foundation stability, and prevention of water damage.

HP-1.5 Encourage the use of private-initiated and / or publicly-funded programs to provide housing for low- and moderate-income families, and pursue as feasible, appropriate, applicable local, State, and Federal housing and economic development programs. As pertinent information becomes available, develop a program for notifying residents of the availability of housing programs and funding.

HP-1.6 Preserve the City's more affordable housing stock along with historical and cultural heritage through preservation and innovative reuse of older structures.

HP-1.7 Encourage citizen involvement in property maintenance and efforts to improve the housing stock and overall neighborhood quality.

Goal HG-2: Provide for adequate housing for persons with special housing needs such as target income groups of low-income, the elderly, handicapped, and female-headed households.

Special Needs Housing Policies

HP-2.1 Discrimination in housing based on race, color, religion, sex, family size, marital status, national origin, ancestry, or other arbitrary factors is not permitted. Support appropriate safeguards to ensure fair housing opportunities.

HP-2.2 Encourage provisions for access for the handicapped in new or rehabilitated residential and commercial developments by considering exceptions or revisions to City ordinances allowing more flexibility relating to zoning, density, reduced setbacks or other incentives to provide reasonable accommodation or improve living conditions of residents.

HP-2.3 Encourage the County to allow a variety of housing types in the residential areas surrounding the City. Consider entering into a multi-jurisdictional agreement to provide housing and/or shelter for homeless persons.

HP-2.4 Encourage new residential development in Blue Lake to specifically address the needs of seniors, including projects that have smaller yards, low-maintenance landscaping, limited mobility fixtures, and appropriately sized parking spaces.

Implementation Programs

HI-1 Amend the Zoning Code to address the following:

- **Accessory Dwelling Units (ADUs).** Allow Accessory Dwelling Units (ADU) in accordance with current State law for ADUs, Assembly Bill 2299 and Senate Bill 1069. Consider adopting a Junior Accessory Dwelling Unit (JADU) ordinance to allow for a simple and affordable housing option. To ensure the City's ADU standards are compliant with State law and remain compliant in perpetuity, the City will amend the Municipal Code to cite/reference State law for ADUs. The amendment to the Municipal Code will be provided to HCD for review and recommendation if any changes are required to achieve compliance.

- **Manufactured housing/Mobile homes**. Allow manufactured housing and mobile homes in the same manner and in the same zones as conventional or stick-built structures are permitted (Government Code Section 65852.3). This includes, but is not limited to, allowing manufactured homes on a permanent foundation as a single-family use.

- **Single Room Occupancy Units (SROs).** Define and allow principally permitted in the Residential Multiple-Family (R-3), Mixed-Use (MU), Opportunity (O), and Planned Development Residential (PDR) zones.

- **Transitional and Supportive Housing.** Define transitional and supportive housing. Permit transitional and supportive housing in all zones allowing residential uses subject to only the same restrictions on residential uses contained in the same type of structure. In addition, transitional and supportive housing will be allowed as a permitted use, without discretionary review, in zones where multi-family and mixed uses are permitted, including nonresidential zones permitting multi-family uses.

- **Emergency Shelters.** Allow by-right, without discretionary review, in a zoning district with sufficient capacity to accommodate the identified need for shelters (e.g., Opportunity zone).

- **Employee Housing.** Comply with the State Employee Housing Act (Health and Safety Code Sections 17021.5 and 17021.6). This includes the following amendments: 1) amendment of the Zoning Code to allow agricultural employee housing for six or fewer persons by-right in the Residential One-Family (R-1) zoning district, subject to the same regulations as a single-family dwelling; 2) amendment of the Zoning Code to allow agriculture employee housing of no more than 12 units or 36 beds as a by-right agricultural use in the Agricultural Exclusive (AE) zoning district; and 3) amendment of the definition of "Farm Dwelling" in the Zoning Code to be consistent with Health and Safety Code Section 17026.1.

- **Density Bonus.** Comply with state density bonus law (Government Code [GC] Section 65915, as revised). Promote the density bonus through informational brochures, which will be displayed at City Hall.

- **Reasonable Accommodation.** Develop and formalize a process that a person with disabilities will need to go through to make a reasonable accommodation request in order to accommodate the needs of persons with disabilities and streamline the permit review process. The City will provide information to individuals with disabilities regarding reasonable accommodation policies, practices, and procedures based on the guidelines from HCD. This information will be available through postings and pamphlets at the City and on the City's website.

- **Residential Care Facilities.** Allow for residential care homes with six or fewer persons by-right in all residential zones subject only to the same restrictions applicable to other residential uses in that zone. Allow larger group homes of seven or more persons in all zones allowing residential uses and

revise zoning and permit procedures with objective standards and procedures to facilitate approval certainty and subject only to the same restrictions applicable to other residential uses in that zone. Additionally, the City will amend the Zoning Code to update its definition of "family" to be "One or more persons living together in a dwelling unit."

Responsibility: City Council, Planning Commission, and Planning Staff.

Time Frame: Amend the Zoning Code by December 2024. The Zoning Code amendment related to emergency shelters will be completed prior to adoption of the Housing Element.

Funding Source: General Fund and/or Grants.

HI-2 AB 101 (2019), review the City's Zoning Code and make revisions if necessary, to allow low barrier navigation centers for the homeless per Government Code 65660-65668.

Responsibility: City Council, Planning Commission, and Planning Staff.

Time Frame: Review zoning in 2023. Make any necessary revisions December 2024.

Funding Source: General Fund.

HI-3 As resources are available, publicize available programs regarding the following topics through a local community newsletter or water billing:

- Subsidized Housing Programs
- Shared Housing Opportunities
- Available day care/nursery school programs
- Permit process to become a licensed day care provider
- Available adult day care program
- Fair Housing Practices
- Nearby Social Services
- Housing Rehabilitation Programs, Weatherization Programs
- Local Employment Opportunities

Responsibility: City Council and City Clerk.

Time Frame: Ongoing, as programs are available. Programs will be publicized quarterly, at a minimum.

Funding Source: General Fund.

HI-4 As Notices of Funding Available (NOFAs) are released, apply for available grant funding through the CalHome program to assist individual first-time homebuyers through deferred-payment loans for down payment assistance, home rehabilitation, including manufactured homes not on permanent foundations, acquisition and rehabilitation, homebuyer counseling, self-help mortgage assistance, or technical assistance for self-help homeownership.

Responsibility: City Council, Planning Commission, and Planning Staff.

Time Frame: Annually apply as NOFAs are released.

Funding Source: CalHome and other available funding sources.

HI-5 To encourage development of housing for lower- income households including, extremely low-income, and special needs households such as, people experiencing homelessness, senior, single parent, and disabled households, the City is proposing the following activities: 1) work with local non-profits on a variety of activities, such as conducting outreach to housing developers on an annual basis; providing financial assistance (when feasible), or in-kind technical assistance; 2) providing expedited processing; 3) identifying grant and funding opportunities; 4) applying for or supporting applications for funding on an ongoing basis; 5) reviewing and prioritizing local funding at least twice in the planning period; and/or 6) offering additional incentives beyond the density bonus.

In addition, support the rehabilitation of suitable structures to single room occupancy units by providing available grant funding or other financial assistance opportunities when projects are brought to the City.

Responsible Agencies: City Council, Planning Commission, and Planning Staff.

Timeframe: Annual outreach to developers, prioritize local funding at least twice in the planning period, and support expediting applications on an ongoing basis.

Funding Source: General Fund, CDBG Funds.

HI-6 Encourage new and rehabilitated units to include weatherization improvements such as ceiling and floor insulation, caulking, and weather-stripping, and disseminate energy conservation information for existing housing by publicizing and / or providing information regarding energy audit and weatherization programs, such as those through the Redwood Coast Energy Authority, PG&E, and Energy Upgrade California™, as they become available.

Responsibility: City Council, Planning Commission, and Building Official.

Time Frame: Ongoing; as projects are processed, and program informational materials are made available.

Funding Source: General Fund.

HI-7 If applicable, the City will establish a written policy or procedure and other guidance as appropriate to specify the SB 35 streamlining approval process and standards for eligible projects, as set forth under GC Section 65913.4.

Responsibility: City Council, Planning Commission, and Planning Staff.

Time Frame: Annually review and, if applicable, develop an SB 35 streamlining approval process within one-year of determining that SB 35 applies to sites within the City.

Funding Source: General Fund and/or Grants.

HI-8 Continue to require all projects to comply with the current version of Title 24 of the California Building Standards Code.

Responsibility: City Building Department.

Time Frame: Ongoing, as projects are processed.

Funding Source: General Fund.

HI-9 The City will conduct a survey of the existing housing stock as an initial step for determining the housing rehabilitation needs in city limits. Once the survey is completed, the City will coordinate with the County of Humboldt on directing available funding to property owners in targeted income groups. Because the City does not have the resources to administer a housing rehabilitation program, the County of Humboldt is currently the agency that is assisting residents in city limits with obtaining housing rehabilitation funding.

Responsibility: City Council and City Staff.

Time Frame: Complete the housing conditions survey of the existing housing stock in the City by December 2023. Beginning in the first quarter of 2024, coordinate on a quarterly basis with the County of Humboldt during the planning period.

Funding Source: General Fund.

HI-10 Develop a plan to Affirmatively Further Fair Housing (AFFH). The AFFH Plan shall take actions to address significant disparities in housing needs and in access to opportunity for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 [commencing with Section 12900] of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law.

Specific actions could include but are not limited to:

- Provide dedicated staff that investigates fair housing complaints and enforces fair housing laws.
- Facilitate public education and outreach by creating informational flyers on fair housing that will be made available at public counters, libraries, and on the City's website. City Council meetings will include a fair housing presentation at least once per year.
- Actively recruit residents from neighborhoods of concentrated poverty to serve or participate on boards, committees, and other local government bodies.
- Develop a proactive code enforcement program that holds property owners accountable.
- Provide education to the community on the importance of completing Census questionnaires.
- Review the Zoning Code and other City codes and policies for consistency with the fair housing law.

Responsibility: City Council, Planning Commission, and Planning Staff.

Time Frame: Create Plan within three years of adoption of the Housing Element, and implement on an ongoing basis.

Funding Source: General Fund and/or Grants.

HI-11 The City will continue to encourage appropriately licensed/permitted cottage or home-base industries, including those related to recreation/tourism to the area, to a reasonable extent, in efforts to bolster

the City's economy, promote affordable housing, and increase employment opportunities by implementing the following actions:

- Permit at least one (1) licensed day care or nursery school operation where appropriate
- Increase tourism revenues by promoting community events
- Increase opportunities for development of cottage industries / home occupations that are compatible with neighborhood character and environmental constraints
- Permit appropriate and necessary ancillary services to the recreational fishing industry

Responsibility: City Council, City Clerk, and Planning Staff.

Time Frame: As feasible, hold annual meetings between the City Council, Economic Development Commission, and Business Community.

Funding Source: General Fund.

HI-12 Work with the Redwood Coast Regional Center (RCRC) to implement an outreach program that informs families in the city about housing and services available for persons with developmental disabilities. The program could include developing an informational brochure and directing people to service information on RCRC's website (https://redwoodcoastrc.org/for-clients/our-services/).

Responsibility: City Council, City Clerk, and Planning Staff.

Time Frame: Develop an outreach program within two years of adopting the Housing Element to assist persons with development disabilities. Once the outreach program is developed, outreach is proposed to occur on a quarterly basis.

Funding Source: General Fund and/or Grants.

HI-13 To ensure that assisted affordable housing remains affordable, the City will monitor the status of all affordable housing projects and, as their funding sources near expiration, will work with owners and other agencies to consider options to preserve such units. The City will also provide technical support to property owners and tenants regarding proper procedures relating to noticing and options for preservation.

Responsibility: City Council, City Clerk, and Planning Staff.

Time Frame: Ongoing, as projects approach expiration.

Funding Source: General Fund and/or Grants.

HI-14 To ensure that the use permit process for multi-family projects does not impact the timing, cost, or supply of multi-family development, the City will adopt and apply a Combining Zone to sites in the Residential Multiple-Family (R-3), Mixed-use (MU), Opportunity (O), and/or Planned Development Residential (PDR) zones to allow multi-family residential uses by-right at a density of 16 units per acre.

Responsibility: City Council, City Clerk, and Planning Staff.

Time Frame: Adopt the Combining Zone and apply to sites zoned Residential Multiple-Family (R-3), Mixed-use (MU), Opportunity (O), and/or Planned Development Residential (PDR) to allow multi-family

residential uses by-right by December 2024. Capacity for at least 11 units (5th cycle RHNA) will meet all by right requirements pursuant to Government Code Section 65583.2, subdivisions (h) and (i).

Funding Source: General Fund and/or Grants.

HI-15 The City will review the City's Safety and Conservation Elements and any other General Plan Elements, as required, and ensure compliance with new State Law.

In addition, the city will bi-annually review the effectiveness of the programs in the Housing Element and make revisions as appropriate, including monitoring the effectiveness of programs to accommodate the regional housing need. If programs are not effective in making progress toward the regional housing need, the city will immediately revise strategies and amend the housing element for HCD review.

Responsibility: City Council, City Clerk, and Planning Staff.

Time Frame: Review in 2023, revise as necessary within three years of adoption of the Housing Element. Monitor the Housing Element programs annually and submit to HCD by April 1 each year.

Funding Source: General Fund and/or Grants.

HI-16 To comply with SB 1087, the City as the water and sewer provider, will set up a process to grant priority for water and sewer service allocations to proposed developments that include units affordable to lower-income households.

Responsibility: City Council, City Clerk, and Planning Staff.

Time Frame: Set up a process by December 2024; ongoing as projects are processed.

Funding Source: General Fund and/or Grants.

HI-17 As required by the Annual Progress Report process, the City will monitor the production and affordability of Accessory Dwelling Units (ADUs) and Junior Accessory Dwelling Units (JADUs) during the planning period. If ADU production does not meet the projections in the Housing Element, additional actions will be taken in consultation with HCD. The additional actions could include but are not limited to 1) conducting outreach to inform the public about current State law for ADUs and the benefits of ADU development; 2) amending the Municipal Code to incorporate ADU standards that are more permissive than current State law; or 3) rezoning sites in the City that have non-residential zoning to zones allowing residential development.

Responsibility: Planning Staff and Building Official.

Time Frame: ADU production and affordability will be monitored annually throughout the planning period. If additional actions need to be taken due to lack of ADU production, those actions will be taken within one-year of the City determining that the projections in the Housing Element are not being met.

Funding Source: General Fund and/or Grants.

HI-18 To address the potential for insufficient wastewater treatment capacity during a portion of the planning period, the City shall construct the wastewater treatment plant improvements identified in its Capital Improvement Plan within two years of adopting the Housing Element. These improvements include

electrical panel upgrades and the installation of aerators, which are estimated to provide an additional 180 residential equivalent units (REUs).

Responsibility: City Council, City Manager, Public Works Department, and City Engineer.

Time Frame: The improvements to the wastewater treatment plant will be completed within two years of adoption of the Housing Element.

Funding Source: Wastewater Enterprise Fund, Development Impact Fees, and/or Grant Funding.

HI-19 To remove potential constraints to the development of multi-family housing, the City shall amend the following development standards in the Zoning Code:

- Zoning Code Section 17.16.080(C)(1)(b) requires a maximum ground coverage standard of 40 percent for the Planned Development Residential (PD-R) zone. This section shall be amended to allow a maximum ground coverage of 60 percent, which is the same as several other zones in the City allowing multi-family housing (e.g., R-2, R-3, and MU zones).
- Zoning Code Section 17.16.080(C)(1)(a) requires a maximum building height standard of 30 feet for all other structures, which includes multi-family housing. This section shall be amended to allow a maximum building height of 35 feet for all structures, which is the standard required for single-family structures in the Planned Development Residential (PD-R) zone.
- Zoning Code Section 17.16.080(C)(1)(c) requires the following setbacks for all other structures, which includes multi-family housing: Front – 25 feet, Side – 10 feet, Rear – 25 feet. This section shall be amended to allow the following setbacks for multi-family structures: Front – 15 feet, Side – 5 feet, and Rear – 20 percent of lot depth to a maximum of 20 feet. This amendment would make the PDR zone setbacks for multi-family housing more consistent with other zones allowing multi-family housing in the City.
- Zoning Code Sections 17.16.040(C)(5) and 17.16.110(D)(4) require the following maximum building height standard, "*35 feet, not exceeding two stories*." These sections of the Residential Two-Family (R-2) and Mixed-Use (MU) zones shall be amended to remove the limitation on the number of building stories. This amendment would make the R-2 and MU building height standards more consistent with other zones allowing multi-family housing in the City.

Responsibility: City Council, Planning Commission, and Planning Staff.

Time Frame: Amend the Zoning Code by December 2024.

Funding Source: General Fund and/or Grants.

HI-20 To comply with the transparency requirements in Government Code Section 65940.1(a)(1), the City shall upload the following documents to the City of Blue Lake website so they are readily available for public review: 1) schedule of fees; 2) zoning map; 3) list of information required for a complete development application; 4) current and five previous annual fee reports or the current and five previous annual financial reports; and 5) an archive of impact fee nexus studies, cost of service studies, or equivalent.

Responsibility: City Council, City Manager, City Staff.

Time Frame: The required documents will be uploaded to the City's website within one-year of the adoption of the Housing Element.

Funding Source: General Fund and/or Grants.

HI-21 To comply with the requirements for objective standards in Government Code Section 65589.5, subdivision (f), the City shall replace the subjective review criteria for the Site Plan Approval process (i.e., "Principles to Be Followed" in Zoning Code Section 17.24.250(F)) with objective standards. Objective standards are defined as those that involve no personal or subjective judgment by a public official and being uniformly verifiable by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant or proponent and the public official reviewing the project.

Responsibility: City Council, City Manager, and City Staff.

Time Frame: Amend the Zoning Code by December 2024.

Funding Source: General Fund and/or Grants.

HI-22 To minimize the potential for confusion regarding the applicability of the City's design guidelines, the City shall amend all zones that reference the guidelines (e.g., MU, RC, etc.) to make it clear that they are recommendations and not enforceable standards of the Zoning Code.

Responsibility: City Council, City Manager, and City Staff.

Time Frame: Amend the Zoning Code by December 2024.

Funding Source: General Fund and/or Grants.

HI-23 To ensure housing development in the City is occurring at the projected densities consistent with the income categories anticipated, the City will annually review building development on the vacant and likely developable sites included in the sites inventory of this element. If the annual review shows that sites are not providing sufficient opportunities for housing affordable to lower-income households, the City will review its Zoning Code to consider other measures, including the adoption of incentives or regulatory mechanisms to encourage construction at the mid-point or higher end of the density range. These measures could include but are not limited to: 1) requiring a minimum residential density; and 2) density bonuses (i.e., specifying development standards that may be modified to make units more affordable – reduced lot sizes, increased ground coverage, etc.).

Responsibility: City Council, City Manager, and City Staff.

Time Frame: Housing production and affordability will be monitored annually throughout the planning period. If additional actions need to be taken due to the lack of housing production, those actions will be taken within one-year of the City determining that the sites are not providing sufficient opportunities for housing affordable to lower-income households.

Funding Source: General Fund and/or Grants.

Quantified Objectives

Based on the policies and actions outlined above, the following objectives represent a reasonable expectation of the number of new housing units that will be developed, rehabilitated, or conserved and the number of households that will be assisted over the eight year planning period. Table 2 illustrates the City's reasonable expectations for development during the planning period.

Table 2: Quantified Objectives, 2019–2027

	Income Category					
	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
New Construction[1]	5	6	5	7	11	**34**
Rehabilitation[2]				6	4	**10**
Preservation[3]						
Total	**5**	**6**	**5**	**13**	**15**	**44**

Source: City of Blue Lake, May 2022

(1) New construction objectives are based on the Regional Housing Needs Allocation from the 5th and 6th cycles. It is assumed that approximately 50% of the very low income RHNA is allocated towards extremely low income.

(2) There is not currently a funded rehabilitation program in place within the City to assist low-income persons with rehabilitation of existing housing units. Therefore, it is anticipated that rehabilitation efforts would be focused on moderate and above moderate units.

(3) City staff have indicated that there are zero units at risk at this time based upon available information.

Evaluation of the Previous Housing Element

The following table provides the implementation progress of the City's housing programs from the last Housing Element adopted by the City, which was in 2009 during the 4th planning cycle. As a part of this review and evaluation, the housing programs from the 2009 Housing Element have been completely reworked to be more straightforward and streamlined.

As indicated in the table below, the implementation of the programs from the 2009 Housing Element during the 4th and 5th planning cycles was limited. As discussed below, some of the programs that were fully or partially implemented included:

- Program 1: The City chose to default to State ADU regulations instead of amending their ordinance to include restrictions on the development of ADUs as still allowed by State law.
- Program 4: The City began developing a draft combining zone that, when adopted and applied to individual properties, will principally permit multi-family housing.
- Program 7: The City posted notices regarding fair housing law and the process for filing fair housing complaints.
- Programs 12 and 13: The City provided information to renters and homeowners about the weatherization programs offered and administered by the Redwood Coast Energy Authority (RCEA) and Redwood Community Action Agency (RCAA). During the 5th cycle, dozens of residences in the City received weatherization improvements through these programs.
- Program 14: The City continued to require all new construction to comply with Title 24 of the California Building Code.
- Program 17: The City encouraged owners of large homes to convert them to multiple long-term rental units.
- Program 22: The City amended the Municipal Code to allow the City Planner to waive off-street parking requirements administratively. The waiver has been used on several residential projects since its adoption and could also be used to allow parking reductions for special needs housing.
- Program 23: Promotional materials about numerous programs that could assist low-income and special needs populations with obtaining housing and social services were made available at City Hall and the Blue Lake Community Resource Center.

Despite these efforts, the beneficial impact to special needs populations in the City from these actions was not readily apparent during the 4th and 5th planning cycles. Housing development in the City during these cycles primarily included market-rate single-family and small multi-family projects (e.g., triplexes and fourplexes) and a few ADUs. However, as some of the proposed code amendments are completed and applied to future housing development, it is anticipated that it will result in a substantial reduction of potential barriers to the development of housing for a variety of income levels and for special needs populations during the 6th cycle and future planning cycles.

Program		Implementation status	Continue/Modify/Delete
1. The City will review its 2003 Revised Second Unit Ordinance to create ways to further the appropriate construction of "second units or granny units" on single-family lots beyond the creation of the Ordinance and rezoning of lots for applicability.	Responsibility: City Staff/Planning Department Time Frame: By 2014	During the 5th planning cycle, the City's Accessory Dwelling Unit regulations were determined by HCD to be "null and void" due the numerous inconsistencies with State regulations. Since that time, the City has deferred to current State regulations for Accessory Dwelling Units. The City has contacted HCD (adu@hcd.ca.gov) on several occasions to ask questions and receive clarification to ensure that State ADU regulations were being properly implemented in the City.	Modify. See Program HI-1.
2. The City will adopt a density bonus ordinance in accordance with Section 65915 of the Government Code. A density bonus will be granted by the City to an interested developer in exchange for a guarantee of affordable units.	Responsibility: City Council Time Frame: By 2014, if applicable.	During the 4th and 5th planning cycles, the City did not adopt a density bonus ordinance. The City defaults to current state regulations for density bonus requirements.	Modify. See Program HI-1.
3. The City will encourage planned developments on large parcels to facilitate the construction of a variety of housing types and densities, including multi-family for lower-income households. Financial assistance to offset part of the cost of extending public facilities will be considered by the City as an activity for inclusion in an application to the State Department of Housing & Community Development (HCD) for Community Development Block Grant (CDBG) Funds to assist in upgrading living conditions for the residents of Blue Lake.	Responsibility: City Council & RCAA Time Frame: If individual is interested and program funds available, City will assist in a minimum of one application in the next five years. City will look into reapplying for funding when funds from the previous grant are expended.	During the 4th and 5th planning cycles, the City encouraged development on Planned Development Residential zoned parcels in the western portion of the City. Parcel 025-101-023 (~3 acres) was approved for the development of three single-family residences with accessory dwelling units and two duplexes (total of 10 units). The City did not submit any applications for CDBG funds to encourage planned development during the 4th and 5th planning cycles.	Modify. See Programs HI-5 and HI-14.

Program		Implementation status	Continue/Modify/Delete
4. The City will propose revision of the R3 Zone in the Zoning Ordinance to establish performance standards (as seen in the newly updated Industrial Zone) that would allow more of the conditionally allowable uses to be principally permitted (by right) and including multi-family developments.	Responsibility: Planning Department and City Council Time Frame: By 2014	The City considered amendment of the R3 Zone to principally permit multi-family housing during the 4th and 5th planning cycles. The City ultimately decided to pursue developing a Combining Zone that, when applied to individual properties, would principally permit multi-family housing. The Combining Zone is proposed for adoption during the current planning cycle.	Modify. See Program HI-14.
5. The City will continue to apply (or support applications) to HCD and agencies for funds to provide low interest and deferred loan programs for the rehabilitation of housing occupied by targeted income households.	Responsibility: City Staff and City Council Time Frame: Minimum one application in next five years if program funding is offered.	The City was not contacted by any qualifying households during the 4th and 5th planning cycles.	Modify. See Programs HI-4 and HI-9.
6. The City will continue participation in the Humboldt County Fair Housing Committee sponsored by the Board of Realtors.	Responsibility: City Council Time Frame: Ongoing	During the 4th and 5th planning cycles the City did not participate in the Humboldt County Fair Housing Committee.	Modify. See Program HI-10.
7. The City Clerk is designated as the contact for referral of fair housing complaints to the State Department of Fair Housing and Employment.	Responsibility: City Staff Time Frame: Ongoing. A minimum two notices will be posted each year at City Hall, the County Library, and the Post Office by City Staff.	During the 4th and 5th planning cycles, notices were posted on several occasions at City Hall.	Modify. See Program HI-10.
8. During the effective period of this element the City will review the zoning ordinance and other City policies for consistency with the fair housing law.	Responsibility: Planning Department and City Councill Time Frame: By 2014	During the 4th and 5th planning cycles, the City was not made aware of any inconsistencies between the Municipal Code and fair housing law.	Continue. See Program HI-10.

Program		Implementation status	Continue/Modify/Delete
9. During the effective period of this element the City will review the zoning ordinance to include emergency shelters, transitional housing and group housing and allow them in appropriate zones if the need arises. If the need is addressed, Blue lake will enter into a multi-jurisdictional agreement with surrounding communities to address this problem pursuant to SB 2.	Responsibility: Planning Department and City Council Time Frame: By 2014	During the 4th and 5th planning cycles, the City considered amending the Municipal Code to allow these uses in the Retail Commercial and Mixed-use zones in and around the downtown. The amendments were not ultimately adopted.	Modify. See Program HI-1.
10. During the effective period of this element the City will review the sewer and water ordinances to ensure compliance with SB 1087. If they are not in compliance, the City will update and amend the ordinances so as to facilitate housing development for lower-income families and workers.	Responsibility: Planning Department and City Council Time Frame: By 2014	During the 4th and 5th planning cycles, no amendments were made to ensure compliance with SB 1087.	Continue. See Program HI-16.
11. During the effective period of this element the definition of family in the zoning ordinance will be revised to be compliant with fair housing law.	Responsibility: Planning Department and City Council Time Frame: By 2014	This amendment to the Municipal Code did not occur during the 4th and 5th planning cycles.	Modify. See Program HI-1.
12. Energy conservation information for existing housing will be disseminated by publicizing available weatherization programs.	Responsibility: City Council Time Frame: Ongoing	During the 5th planning cycle, the City provided information at City Hall about RCEA and RCAA weatherization programs as information was made available. City staff, RCEA, and RCAA conducted public outreach to make renters and homeowners aware of these programs. During the 5th cycle, dozens of residences in the City received weatherization improvements through these programs.	Modify. See Programs HI-3 and HI-6.

Program		Implementation status	Continue/Modify/Delete
13. Rehabilitated units will be encouraged to include retrofit weatherization improvements such as ceiling and floor insulation, caulking and weather-stripping.	Responsibility: City Council Time Frame: As part of any approved, funded program	During the 5th planning cycle, the City provided information about weatherization programs to owners rehabilitating residential units.	Continue. See Program HI-6.
14. New construction will be required to comply with Title 24 of the State Building Code. These requirements are approved by the City Building Department at the time of plan review or permit application.	Responsibility: Building Department Time Frame: Ongoing, current requirement.	During the 4th and 5th planning cycles, all new construction was required to comply with Title 24 requirements.	Continue. See Program HI-8.
15. The City will continue to seek methods to revitalize Downtown. The purpose will be to increase local employment opportunities and tourist spending. The City Council will meet with the Blue Lake Chamber of Commerce to discuss business opportunities and constraints.	Responsibility: City Council. Time Frame: Minimum annual meeting with City Council	During the 4th and 5th planning cycles, the City continued marketing the Downtown including seeking grant funding to acquire a property for development of a plaza and a portion of the Annie and Mary Trail.	Delete.
16. A capital improvement program will be prepared. Financial assistance will be sought to implement identified strategies from the State Economic Development Set-Aside and HUD's Urban Development Action Grant Program.	Responsibility: City Council. Time Frame: Minimum one application in next five years if program funding is available and specific need is determined.	During the 4th and 5th planning cycles, components of a capital improvement program were prepared. The City sought funding through sources other than those identified in this program.	Delete.
17. Large homes suitable for bed and breakfast are encouraged to convert to this use as part of the tourism effort.	Responsibility: Homeowner Time Frame: Ongoing/currently available.	During the 4th and 5th planning cycle, the City did not encourage owners of large homes to convert them to bed and breakfast businesses. Instead, the City encouraged owners of large homes to convert them to multiple long-term rental units.	Delete.
18. Increased local employment opportunities should be pursued through development of small business start-up opportunities and	Responsibility: City Council. Time Frame: Minimum one CDBG application in next five years if program funding offered.	During the 4th and 5th planning cycles, the City did encourage the development of small businesses and pursued financial assistance	Delete.

Program		Implementation status	Continue/Modify/Delete
designation of suitable area for development. Financial assistance should be pursued.		through sources other than those identified in this program.	
19. Feasibility for group quarter opportunities for targeted groups (single persons, female-headed households, disabled, seniors, etc.) will be researched and implemented if a need or interest is identified. Once a need or interest is identified and program funds are available, the City will apply for HCD's Family Housing Demonstration Program (FHDP).	Responsibility: City Council. Time Frame: If individual is interested and program funds available, City will assist in minimum one application next five years.	The City was contacted by one developer interested in developing senior housing on APN 025-101-023 during the 5th planning cycle. The project ultimately did not move forward because the developer determined that the lot constraints would not allow for a viable project. The lot constraints included an irregular lot shape, a drainage easement along the northern property boundary, and a large area of wetlands in the middle portion of the site. As discussed under Program 3, APN 025-101-023 (~3 acres) was ultimately approved for the development of three single-family residences with accessory dwelling units and two duplexes (total of 10 units).	Modify. See Program HI-5.
20. Senior Group Housing Opportunities should be pursued. The City will submit at least one application to HCD, at time a Request for Proposal is distributed, for Senior Citizen Shared Housing Program (SCSHP).	Responsibility: City Council. Time Frame: If individual is interested and program funds available, City will assist in minimum one application next five years.	The City was contacted by one developer interested in developing senior housing on APN 025-101-023 during the 5th planning cycle. The project ultimately did not move forward because the developer determined that the lot constraints would not allow for a viable project. The lot constraints included an irregular lot shape, a drainage	Modify. See Program HI-5.

Program		Implementation status	Continue/Modify/Delete
		easement along the northern property boundary, and a large area of wetlands in the middle portion of the site. As discussed under Program 3, APN 025-101-023 (~3 acres) was ultimately approved for the development of three single-family residences with accessory dwelling units and two duplexes (total of 10 units).	
21. The City will revise the Residential-1 (R1) section of the Zoning Ordinance to address group homes (rest homes, nursing homes, etc.) of fewer than six persons to be consistent with State law.	Responsibility: Planning Department and City Council Time Frame: By 2014	This amendment to the Municipal Code did not occur during the 4th and 5th planning cycles.	Modify. See Program HI-1.
22. The City will implement the requirements of the American Disabilities Act through the following specific actions: a) The City will provide a process for requesting "reasonable accommodation" with respect to zoning, permit processing, building laws, and the enforcement of building codes and the issuance of building permits. Once the process for "reasonable accommodation" is developed, the City will make this information available to the public by mailing it out with the monthly water bills. b) During the effective period of this element the City will make efforts to remove any existing constraints on housing for persons with disabilities, such as accommodating procedures for the approval of group homes, ADA retrofits,	Responsibility: City Council and City Building Official Time Frame: Ongoing	a) During the 4th and 5th planning cycles, this task was not completed, and no requests were made for reasonable accommodation. b) During the 4th and 5th planning cycle, no units were developed in the City for persons with disabilities. c) During the 5th planning cycle, the City amended the Municipal Code to allow the City Planner to waive off-street parking requirements administratively. The waiver has been used on several residential projects since its adoption and could also be used to allow parking	Modify. See Programs HI-1 and HI-14.

Program		Implementation status	Continue/Modify/Delete
and evaluation of the zoning code for ADA compliance or other measures that provide flexibility. c) The City will also revise Section 610 of the zoning ordinance to addressing off-street parking facilities to allow for parking reductions for special needs housing.		reductions for special needs housing.	
23. The City, through local community newsletter or water billing, will publicize available programs or resources regarding the following: a) Subsidized Housing Programs. b) Shared Housing Opportunities. c) Available day care/nursery school programs. d) Permit process to become a licensed day care provider. e) Fair Housing Practices. f) Nearby Social Services. g) Housing Rehabilitation Programs, Weatherization Programs. h) Local Employment Opportunities.	Responsibility: City Council and City Clerk Time Frame: Distribute information twice a year	Promotional materials about these programs were made available at City Hall and the Blue Lake Community Resource Center during the 4th and 5th planning cycles.	Continue. See Program HI-3.
24. The City, will conduct proactive efforts to assist multi-development for low- and moderate-income households through the following specific actions: a) Assist developers in identifying suitable sites. b) Work with USDA Rural Development to keep up with funding opportunities applicable to this type of development where zoned appropriately allow conversion of large historic residences into multiple units and use housing rehabilitation	Responsibility: City Clerk, Planning Department, and City Council Time Frame: Ongoing, but the funding search will begin upon adoption of this update.	a) During the 4th and 5th planning cycles, the City assisted three developers in pursuing multi-family housing projects on suitable sites. b) During the 4th and 5th planning cycles, no eligible projects were proposed in the City. c) During the 4th and 5th planning cycles, the City continued to provide	Modify. See Programs HI-5 and HI-14.

Program		Implementation status	Continue/Modify/Delete
money for qualifying users and look for other funding opportunities. c) Continue offering pre-application meetings to assist in developmental issues and concerns.		free application assistance meetings to applicants pursuing housing projects.	
25. The City will pursue or provide assistance to individuals for the development of limited care facilities for seniors and/or the disabled.	Responsibility: City Council working with Service Providers Time Frame: If application program is identified and program funds are available, City will submit one application in next five-year period.	The City was contacted by one developer interested in developing senior housing on APN 025-101-023 during the 5th planning cycle. The project ultimately did not move forward because the developer determined that the lot constraints would not allow for a viable project. The lot constraints included an irregular lot shape, a drainage easement along the northern property boundary, and a large area of wetlands in the middle portion of the site. As discussed under Program 3, APN 025-101-023 (~3 acres) was ultimately approved for the development of three single-family residences with accessory dwelling units and two duplexes (total of 10 units).	Modify. See Program HI-5.

Community Profile

Population Characteristics

Housing needs are largely determined by population and employment growth, coupled with various demographic variables. Characteristics such as age, household size, occupation, and income combine to influence the type of housing needed and its affordability.

Population Growth

Between 2010 and 2020, Humboldt County's population grew slightly by 1,840 people, or +1.4 percent. In contrast, Blue Lake's population shrunk by 45 people, or -3.6 percent between 2010 and 2020 (see Table 3).

Table 3: Population Growth 2010-2020

City/County	Total Population		2010–2020 Change	
	2010	2020	Number	Percentage
Blue Lake	1,253	1,208	-45	-3.6%
Humboldt County	134,623	136,463	1,840	1.4%

Source:2010 and 2020 Decennial Census Redistricting Data.
Note: Population counts vary slightly based on the source of data and type of survey.

Age Characteristics

Current and future housing needs are usually determined in part by the age characteristics of a community's residents. Each age group has distinct lifestyles, family type and size, incomes, and housing preferences. Consequently, evaluating the age characteristics of a community is important in determining its housing needs.

The median age of residents in Blue Lake is approximately 51 years old. The median age has been increasing slowly, from 45.9 in 2010 to 51 in 2019. The City's population is slowly getting older, with 52.5 percent of residents over 45 years of age, and 33.3 percent of residents in the family-forming age group (25–44). Table 4 shows the age distribution of the population of Blue Lake.

Table 4: Population by Age (2019)

Age Group	Number	Percentage
0 to 9 years	80	8.9%
10 to 19 years	27	3.0%
20 to 24 years	22	2.4%
25 to 34 years	241	26.8%
35 to 44 years	58	6.5%
45 to 54 years	42	4.6%
55 to 59 years	66	7.3%
60 to 64 years	149	16.5%
65 to 74 years	156	17.3%

Age Group	Number	Percentage
75 to 84 years	43	4.8%
85 years and over	18	2.0%
Median age (years)	50.5	(X)

Source: 2015-2019 ACS 5-Year Estimates, Table S0101.

Employment Trends

According to the 2015-2019 American Community Survey, 506 people 16 years and over were employed in the City. Educational services, and health care and social assistance is the industry with the largest number of employees in the City at 178 people, or 35.2 percent. Table 5 shows employment by industry in Blue Lake . The largest employers in the City of Blue Lake are in the manufacturing (Mad River Brewery, Wallace & Hinz, Tomaso's, Fish Brothers, Sjaak's Chocolates), educational services (Blue Lake Elementary School, Dell'Arte School of Physical Theatre), and public administration (City of Blue Lake) industry sectors. According to the 2015-2019 American Community Survey, the unemployment rate in the City is approximately 3 percent.

Table 5: Employment by Industry (2019)

Industry	Number	Percentage
Civilian employed population 16 years and over	506	100.0%
Agriculture, forestry, fishing and hunting, and mining	16	3.2%
Construction	32	6.3%
Manufacturing	60	11.9%
Wholesale trade	4	0.8%
Retail trade	8	1.6%
Transportation, warehousing, and utilities	14	2.8%
Information	13	2.6%
Finance, insurance, real estate, rental, and leasing	7	1.4%
Professional, scientific, management, administrative, and waste management services	63	12.5%
Educational services, health care, and social assistance	178	35.2%
Arts, entertainment, recreation, accommodation, and food services	72	14.2%
Other services, except public administration	15	3.0%
Public administration	24	4.7%

Source: 2015-2019 ACS 5-Year Estimates, Table DP03.

Household Characteristics

Households Type and Size

A household refers to the people occupying a home, such as a family, a single person, or unrelated persons living together. Family households often prefer single-family homes or condominiums to accommodate children, while nonfamily households generally occupy smaller apartments or condominiums.

In Blue Lake , families comprised 55.8 percent of all households, and 9.8 percent of all households were family households with children under 18 years of age. Table 6 displays household composition as reported by the 2015-2019 American Community Survey.

Table 6: Household Characteristics (2019)

Jurisdiction	Households	Average Household Size	Percentage of Households	
			Families	Families with Children Under 18
City of Blue Lake	428	2.11	239 (55.8%)	42 (9.8%)

Source: 2015-2019 ACS 5-Year Estimates, Table S1101.

Overcrowding

Overcrowding occurs when there is more than one person per room (excluding bathrooms and kitchens) and severely overcrowding occurs when there are more than 1.51 persons per room. Overcrowding is often a result of an inadequate supply of affordable and decent housing. According to the 2015-2019 American Community Survey, 16 households were living in overcrowded conditions (3.7 percent of all households) and no households were severely overcrowded. Refer to Table 7.

Table 7: Overcrowded Households (2019)

Persons per Room	Number	Percentage
Owner occupied:	**255**	**59.6%**
1.00 or less occupants per room	251	58.6%
1.01 to 1.50 occupants per room	4	0.9%
1.51 or more occupants per room	0	0.0%
Renter occupied:	**173**	**40.4%**
1.00 or less occupants per room	161	36.4%
1.01 to 1.50 occupants per room	12	2.8%
1.51 or more occupants per room	0	0.0%
Total Occupied Housing Units:	**428**	**100.0%**
Total Owner Overcrowded	4	0.9%
Total Renter Overcrowded	12	2.8%
Total Overcrowded	**16**	**3.7%**
Total Owner Severely Overcrowded	0	0.0%
Total Renter Severely Overcrowded	0	0.0%
Total Severely Overcrowded	**0**	**0.0%**

Source: 2015-2019 ACS 5-Year Estimates, Table B25014.

Household Income

The California Department of Housing and Community Development annually publishes income limits per county for use in determining eligibility for assisted housing programs in that county. The 2019 income limits are listed in Table 8 for each income category according to household size. These income limits are based on a median income of $64,800 (for a family of four) in Humboldt County:

- Extremely Low Income — Up to 30 percent of area median income (AMI; $0–$25,750)
- Very Low Income — 31–50 percent of AMI ($25,751–$32,400)
- Low Income — 51–80 percent of AMI ($32,401–$51,850)
- Moderate Income — 81–120 percent of AMI ($51,851–$77,750)
- Above Moderate Income — Above 120 percent of AMI ($77,751 or more)

Table 8: Maximum Household Income by Household Size (2019), Humboldt County

Income Category	Persons per Household							
	1	2	3	4	5	6	7	8
Extremely Low	$13,650	$16,910	$21,330	$25,750	$30,170	$34,590	$39,010	$42,800
Very Low	$22,700	$25,950	$29,200	$32,400	$35,000	$37,600	$40,200	$42,800
Low	$36,300	$41,500	$46,700	$51,850	$56,000	$60,150	$64,300	$68,450
Moderate	$54,450	$62,200	$70,000	$77,750	$83,950	$90,200	$96,400	$102,650

Source: California Department of Housing and Community Development Memorandum, "State Income Limits for 2019," May 6, 2019.

Lower Income Households and Overpayment

Overpayment is narrowly defined as the number of lower-income households that spend more than 30 percent of their income for housing (either mortgage or rent), including cost of utilities, property insurance, and real estate taxes, as defined by the federal government. Table 9 shows the extent of overpayment. Approximately 32.8 percent of households in Blue Lake were overpaying for housing—19.2 percent were renter-occupied households and 13.6 percent were owner-occupied households.

When looking at lower-income households overpaying (households earning less than $51,850 for a household of four), approximately 38 were owner-occupied households and approximately 98 were renter-occupied households.

Table 9: Housing Cost as a Percentage of Household Income by Tenure (2015)

Total Households Characteristics	Number	Percent of Total Households
Total occupied units (households [HH])	**530**	**100.0%**
Total Renter HH	225	42.5%
Total Owner HH	305	57.5%
Total lower income (0-80% of HAMFI[1]) HH	210	39.6%
Lower income renters (0-80%)	135	25.5%
Lower income owners (0-80%)	75	14.2%
Extremely low-income renters (0-30%)	35	6.6%
Extremely low-income owners (0-30%)	10	1.9%
Lower income HH paying more than 50%	88	16.6%
Lower income renter HH severely overpaying	54	10.2%
Lower income owner HH severely overpaying	34	6.4%
Extremely Low Income (0-30%)	40	7.5%
ELI Renter HH severely overpaying	30	5.7%

Total Households Characteristics	Number	Percent of Total Households
ELI Owner HH severely overpaying	10	1.9%
Income between 30%-50%	24	4.5%
Income between 50% -80%	24	4.5%
Lower income HH paying more than 30%	136	25.7%
Lower income renter HH overpaying	98	18.5%
Lower income owner HH overpaying	38	7.2%
Extremely Low Income (ELI; 0-30%)	44	8.3%
Income between 30%-50%	39	7.4%
Income between 50% -80%	53	10.0%
Total HH Overpaying	**174**	**32.8%**
Total Renter HH Overpaying	**102**	**19.2%**
Total Owner HH Overpaying	**72**	**13.6%**
Total HH paying between 30%-50% Income	**86**	**16.2%**
Total households paying > 50% Income	**88**	**16.6%**

Source: 2006-2015 CHAS Data Sets, https://www.huduser.gov/portal/datasets/cp.html#2011-2015_data.

[1] *HAMFI = HUD Area Median Family Income*

Housing Stock Characteristics

Vacancy and Housing Availability

Vacancy trends in housing are analyzed using the vacancy rate as an indicator of housing supply and demand. If housing demand is greater than the supply, the vacancy rate is likely to be low, and the price of housing increases. A vacancy rate of 5 percent is generally considered optimal because it is high enough to provide some flexibility in the housing market without significant increases in housing prices.

As shown in Table 10, the vacancy rate in Blue Lake is moderate, estimated to be 15.6 percent as of 2019, of which 2.0 percent are categorized as seasonal/ recreational or occasional use.

Table 10: Residential Vacancy Rate (2019)

Type	Number	Percentage
Occupied	428	84.4%
Vacant	79	15.6%
For rent	10	2.0%
Rented, not occupied	20	3.9%
For sale only	0	0.0%
Sold, not occupied	10	2.0%
For seasonal, recreational, or occasional use	10	2.0%
For migrant workers	0	0.0%
Other vacant	29	5.7%
Total Housing Units:	**507**	**100.0%**

Source: 2015-2019 ACS 5-Year Estimates, Tables B25002 and B25004

Housing Tenure

As shown in Table 11, Blue Lake has a higher percentage of householders who own their home (59.6 percent of occupied units) than of householders who rent their home from a property owner (40.4 percent of occupied units).

Table 11: Household Tenure (2019)

Label	Number	Percentage
Owner occupied Units	255	59.6%
Renter occupied Units	173	40.4%
Total	**428**	**100.0%**

Source: 2015-2019 ACS 5-Year Estimates, Table B25009.

Unit Type

As shown in Table 12, the majority (63 percent) of occupied housing units in Blue Lake are single-family, detached homes, followed by multi-family (2-4 Units) which make up 19.5 percent.

Table 12: Housing Units by Type (2021)

Housing Unit Type	Number	Percentage
Single-Family Detached	369	63.0%
Single-Family Attached	12	2.0%
Multi-family, 2-4 Units	114	19.5%
Multi-family, 5+ Units	33	5.6%
Mobile Homes or Other Type	58	9.9%
Total	**586**	**100.0%**

Source: California Department of Finance, E-5, 2021, City of Blue Lake, January 1, 2021.

Housing Age and Conditions

Housing conditions are an important indicator of quality of life in Blue Lake. Like any asset, housing ages and deteriorates over time. If not regularly maintained, structures can deteriorate and discourage reinvestment, depress neighborhood property values, and even become health hazards. Thus, maintaining and improving housing quality is an important goal for communities.

An indication of the quality of the housing stock is its general age. Typically housing over 30 years old is likely to have rehabilitation needs that may include plumbing, roof repairs, foundation work, and other repairs. Table 13 displays the age of the City of Blue Lake's 's housing stock as of 2019, of which 16.2 percent were built since 1990. This means 83.8 percent of the housing stock is over 30 years old, and the rehabilitation needs are likely great in Blue Lake. An updated housing condition survey was completed by the City between October 2022 and April 2023. The City is still in the process of tabulating the data, but the preliminary results indicate that approximately 30 percent of the residential structures in the City are in need of some type of rehabilitation. Once the City completes the review and tabulation of the data, estimates of the number of residential units that are in need of some type of rehabilitation and the level of rehabilitation required will be available.

Table 13: Age of Housing Stock (2019)

Year Built	Number	Percentage
Built 2014 or later	10[1]	1.9%
Built 2010 to 2013	6	1.2%
Built 2000 to 2009	37	7.1%
Built 1990 to 1999	39	7.5%
Built 1980 to 1989	61	11.8%
Built 1970 to 1979	51	9.9%
Built 1960 to 1969	63	12.2%
Built 1950 to 1959	50	9.7%
Built 1940 to 1949	33	6.4%
Built 1939 or earlier	167	32.3%
Total	**517**	**100.0%**

Source: 2015-2019 ACS 5-Year Estimates, Table B25034

[1] *Source: City of Blue Lake Building Permit Records*

Housing Costs and Affordability

Rental Housing Costs

Based on market trends, in Blue Lake for all rentals, the median rent per month was $1,425, and the average rent per month was $1,850.[1]

Sales Prices

According to Trulia, the median sales price for homes in Blue Lake between June and December 2021 was $416,000, based on 11 home sales.

According to the US Census and the ACS, the median value of housing in Blue Lake has more than tripled since 2000.

Data Source	Median Sales Price
1990 Census	$80,200
2000 Census	$119,000
2010 ACS	$324,500
2021 Trulia Sold Homes	$416,000

Housing Affordability

Housing affordability is dependent upon income and housing costs. According to the California Department of Housing and Community Development (HCD) income guidelines for 2019, the AMI in Humboldt County is $64,800 for a family of four. Assuming that the potential homebuyer in each income group has sufficient credit and down payment (10 percent) and maintains affordable housing expenses (such as, spends no more than 30

[1] City of Blue Lake, February, 2022.

percent of their income on the mortgage, taxes, and insurance), the maximum affordable home prices can be determined. Table 14 demonstrates the purchasing power of the income groups defined above.

When looking at rental and sales prices and comparing those to what households can afford, the City has rental housing affordable to moderate-income households and for sale prices affordable to above moderate-income households.

Table 14: Affordable Housing Costs by Income Category (2019)

(Based on a Four-person Household in Humboldt County)	Income Level		
	Very Low	Low	Moderate
Annual Income	$32,400	$51,850	$77,750
Monthly Income	$2,700	$4,321	$6,479
Maximum Monthly Gross Rent[1]	$810	$1,296	$1,944
Maximum Purchase Price[2]	$70,400	$138,100	$185,600

Sources: HCD State Income Limits, 2019; https://www.chase.com/personal/mortgage/calculators-resources/affordability-calculator; https://www.realtor.com/mortgage/tools/affordability-calculator/#summary, accessed 3/11/2020.

[1] Affordable housing cost for renter-occupied households assumes 30% of gross household income, not including utility cost.

[2] Affordable housing sales prices are based on the following assumed variables: approximately 10% down payment, 30-year fixed rate mortgage at 3.66% annual interest rate, taxes, insurance and private mortgage insurance (since borrowers will likely put less than 20% down).

Assisted Units at Risk of Conversion

State law requires that the Housing Element include an analysis of the existing assisted housing developments that are eligible to change from low- to moderate-income housing uses during the next 10 years due to termination of subsidy contracts, mortgage prepayment, or expiration of restrictions on use. There are no subsidized projects in the City of Blue Lake at this time.

Special Needs Groups

This section assesses the special needs households in Blue Lake. Special needs households can be constrained by lower incomes and a lack of housing that is suitable to their special needs.

Senior Households

The limited incomes of many elderly people make it difficult for them to find affordable housing. Many elderly people have physical disabilities and dependence needs that limit their selection of housing. The elderly often require ramps, handrails, and lower cupboards and counters to allow greater access and mobility. To compensate for limited mobility, their housing should be located within easy walking distance of the services that meet their needs, such as medical or shopping facilities, or should be served by public transit. Blue Lake does not presently contain many of these services or facilities. For this reason, the City may be a less desirable location for senior households than surrounding communities (e.g., Arcata, Eureka, and McKinleyville).

As of 2019, it was estimated that were 217 senior citizens living in Blue Lake. Table 15 shows the senior population as of 2019.

Table 15: Senior Households (2019)

Age Group	Number
65 to 74 years	156
75 to 84 years	43
85 years and over	18
Total	**217**

Sources: 2015-2019 ACS 5-Year Estimates, Table DP05.

There are currently no licensed senior assisted living facilities located in the City. Over the last several decades, there has been community interest in developing senior housing of various types. Presently, most assisted living facilities and group homes for seniors are located in more developed communities including Arcata, Eureka, and McKinleyville.

Persons with Disabilities

As defined by the California Government Code, disabilities include physical and mental disabilities. A "mental disability" involves any mental or psychological disorder or condition, such as intellectual disability, organic brain syndrome, emotional or mental illness, or specific learning disabilities that limit a major life activity. A "physical disability" includes any physiological disease, disorder, condition, cosmetic disfigurement, or anatomical loss of body functions. Physical disabilities include those that are neurological, immunological, or musculoskeletal in nature as well as those that involve the respiratory, cardiovascular, reproductive, genitourinary, hemic and lymphatic, or digestive systems and those involving the special sense organs, speech organs, skin, or endocrine system.

Table 16 show the number of persons with disabilities in Blue Lake. Approximately 20.7 percent of the total population (5 years old or older) has some type of disability, and a little more than a third of those are below the age of 65.

Table 16: Persons with Disabilities (2019)

Age Group	Number	Percent of Total Population
5 to 64 years	68	7.5%
65+ Years	119	13.2%
Total Persons with a Disability (Age 5+)	**187**	**20.7%**
Total Population	**902**	**100.0%**

Source: 2015–2019 ACS 5-Year Estimates, Table S1810.

Table 17 shows the total number of persons in Blue Lake by disability type for the 5 to 64 and 65 and over age groups. Many of these persons have more than one disability, which is why more disabilities are listed than there are disabled persons. Cognitive living difficulties and Independent Living Difficulty are the most common forms of disability among residents ages 5 to 64 in Blue Lake. Seniors age 65 and above in Blue Lake are more likely to have to either ambulatory difficulties or hearing difficulties.

Table 17: Persons with Disability by Disability Type (2019)

Disability Group	Number	Percentage
Total Disabilities Tallied	**187**	**100.0%**
Total Disabilities Tallied for People 5 to 64 years	**68**	**36.4%**
With a hearing difficulty	12	2.1%
With a vision difficulty	11	1.9%
With a cognitive difficulty	46	8.0%
With an ambulatory difficulty	18	3.1%
With a self-care difficulty	18	3.1%
With an independent living difficulty	28	4.8%
Total Disabilities Tallied for People 65 Years and Over	**119**	**63.6%**
With a hearing difficulty	53	24.4%
With a vision difficulty	9	4.1%
With a cognitive difficulty	42	19.4%
With an ambulatory difficulty	67	30.9%
With a self-care difficulty	9	4.1%
With an independent living difficulty	29	13.4%

Source: 2015–2019 ACS 5-Year Estimates, Table S1810.

Development Disabilities (Senate Bill 812)

Senate Bill (SB) 812, which took effect in January 2011, requires the City to include in the special housing needs analysis, needs of individuals with a developmental disability in the community. A developmental disability is a disability that occurs before an individual reaches 18 years of age, is expected to continue indefinitely, and constitutes a substantial handicap. Developmental disabilities include intellectual disability, cerebral palsy, epilepsy, autism, and disabling conditions closely related to intellectual disability or requiring similar treatment.

Table 18 includes information about Blue Lake's population of developmentally disabled persons by age and zip code.

Table 18: Persons with Developmental Disabilities (2020)

Zip Code	0–17 years	18+ years
95525	**<11**	**<11**

Source: California Department of Developmental Services 2020.

Many developmentally disabled persons can live and work independently within a conventional housing environment. More severely disabled individuals require a group living environment where supervision is provided. The most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. Because developmental disabilities exist before adulthood, the first issue in supportive housing for the developmentally disabled is the transition from the person's living situation as a child to an appropriate level of independence as an adult.

Depending on the level of disability, a number of housing types may be appropriate for people living with a developmental disability: rent-subsidized homes, licensed and unlicensed single-family homes, inclusionary housing, Section 8 housing, special programs for home purchase, HUD housing, and SB 962 homes, which are

adult residential facilities for persons with special healthcare needs. The design of housing-accessibility modifications, the proximity to services and transit, and the availability of group-living opportunities represent some of the considerations that are important in serving this group. Incorporating "barrier-free" design in all new multi-family housing (as required by California and federal fair-housing laws) is especially important to provide the widest range of choices for disabled residents. Special consideration should also be given to the affordability of housing, as people with disabilities may be living on a fixed income. As discussed further under the section entitled "Provisions for a Variety of Housing", Housing Element Program HI-1 proposes several amendments to the Zoning Code to remove potential constraints relative to housing for persons with disabilities.

Redwood Coast Regional Center

The State Department of Development Services (DDS) currently provides community-based services to approximately 350,000 persons with developmental disabilities and their families through a statewide system of 21 regional centers. The Redwood Coast Regional Center (RCRC) serves individuals and their family who have a developmental disability, or who are at risk for developing a disability, and individuals who are at risk of having a child with a disability in Del Norte, Humboldt, Lake, or Mendocino County. RCRC also serves families whose Infants and toddlers (birth to 36 months) who are at "high risk" for a developmental disability.

In order to fulfill the diverse needs of persons from infancy to end of life, some of the services and supports provided by RCRC include:

- Information and Referral
- Assessment and Diagnosis
- Prenatal Diagnostic Services
- Early Intervention Supports and Services
- Lifelong Individualized Planning and Service Coordination
- Behavioral Supports
- Employment and Day Services
- Health and Medical Services
- Family Support
- Residential Care
- Transportation

Housing Element Program HI-12 specifically addresses the needs of the developmentally disabled. This program proposes coordination with RCRC to develop an outreach program to inform families in the City about housing and services available for persons with developmental disabilities.

Large Families

Large families are defined as households containing five or more persons. They are considered a special needs group because there is a limited supply of adequately sized housing to accommodate their needs. Because of high housing costs, families and/or extended families may be forced to live together under one roof. A five-person household requires a three- or four-bedroom home; a six-person household requires four bedrooms; and a seven-person household requires four to six bedrooms.

According to the 2015-2019 American Community Survey, there were 12 households in Blue Lake that included five or more persons, all of which were in renter-occupied units.

As of 2018, there was no shortage of housing for large families in Blue Lake due to the availability of housing by bedroom size. There are 114 two- to four-bedroom housing units, and 33 units with five or more bedrooms.

Female-Headed Households

Female-headed households are households headed by a single female parent with children under the age of 18 living at home. Single-parent households generally have lower incomes than two-parent households and often require special attention due to their need for affordable child care, health care, and housing assistance. Additionally, female-headed households tend to have lower incomes, limiting the availability of housing.

As of the 2015-2019 American Community Survey, approximately 9 or 3.8 percent of households in Blue Lake were female-headed households with children, and no households were female-headed households under the poverty level.

The Blue Lake Community Resource Center, which is the primary entity that provides social services in the City, provides multiple resources that can assist female-headed households including: 1) housing application assistance; 2) food pantry and hygiene supplies closet; 3) clothing for adults and children, including diapers; 4) medical and dental referrals; and 5) healthy families insurance applications.

Farmworkers

Humboldt is primarily a rural county, and agriculture is a significant driver of the County's economy. The City of Blue Lake contains one property (<5 acres) in City limits that is zoned Agriculture-Exclusive (AE). However, there are several properties used for crop production and grazing adjacent to the City in the surrounding Mad River Valley. As of the 2015–2019 American Community Survey, 16 persons, or approximately 3.2 percent of Blue Lake's population were employed in agriculture, forestry, fishing, and hunting.

Farm workers make up an important but difficult to quantify population, with unique housing needs. Most farmworkers earn relatively low wages, and thus they fall into the extremely low– and very-low-income categories. According to the occupational profile for Humboldt County (accessed March 11, 2020, at www.labormarketinfo.edd.ca.gov), the current weekly mean income is $674. This income falls within the low-income category or below, since many farmworkers are unlikely to work every week of the year.

Agricultural workers earn their primary income through permanent or seasonal agricultural labor. The United States Department of Agriculture (USDA) supplies farm labor statistics to local jurisdictions to use in their Housing Elements through its Census of Agriculture. According to the USDA Census (2017), 859 farm workers, or 56 percent of all farm workers in Humboldt County worked fewer than 150 days per year. According to the USDA (2017), 676 farm workers, or 44% of all farm workers in Humboldt County worked 150 days or more.

Homeless Persons

Homeless individuals and families have the most immediate housing need of any special needs group. Their needs are difficult to meet because of the diversity and complexity of the factors that lead to homelessness. California state law requires that housing elements estimate the need for emergency shelter for homeless people.

The City does not have a record or study quantifying the number of homeless persons within the City. Approximately every two years (except during the COVID-19 pandemic), a consortium of Humboldt County agencies known as the Humboldt Housing and Homeless Coalition (HHHC) join together to conduct a comprehensive count of homeless people within the County, which is referred to as the "Point-in-Time" (PIT) count. The Humboldt County PIT count is based on where a homeless person resided on a particular night,

usually in January. The homeless population is a portion of the Extremely Low-Income Household population (ELI population).

The purpose of the PIT count of homeless individuals is to obtain an unduplicated count and some basic information about homeless people. This information is used to assess the effectiveness of the services the community provides and identify service gaps for future planning. The data is then consolidated with other jurisdictions and reported to the federal Housing and Urban Development Department (HUD) on an annual basis.

According to the 2019 Point-In-Time count conducted by the HHHC, there were approximately 1,470 people without shelter in Humboldt County. Of this count, 14 unsheltered persons were identified in the Blue Lake area.[2] According to the 2022 Point-In-Time count conducted by the HHHC, there were approximately 1,309 people without shelter in Humboldt County. Of this count, 32 unsheltered persons were identified in the McKinleyville/Blue Lake area.[3] Due to the COVID-19 pandemic, the PIT count was not conducted in 2021. Because the 2022 PIT count combined the data for the City of Blue Lake and the unincorporated community of McKinleyville, the 2019 PIT count is considered to be a better representation of the homeless persons residing in or directly adjacent to the City.

Though many of the County's resources for homeless residents are concentrated in the cities of Arcata and Eureka, homeless services are provided in the City by the Blue Lake Community Resource Center. This organization, which is the primary entity that provides social services in the City, is a partnership between St. Joseph Health System, Blue Lake Family Resource Center, and First Five Humboldt. According to the Resource Center, the homeless persons living in Blue Lake are residing on private property (invited and uninvited), living in vehicles, or have established camps along the Mad River.

The City of Blue Lake does not currently have any emergency shelters operating in City limits. According to the Blue Lake Community Resource Center, homeless persons inquiring about shelter are commonly referred to the facilities managed by the Arcata House Partnership and Eureka Rescue Mission. Housing Element Program HI-1 proposes the amendment of the Opportunity (O) zoning district to allow emergency shelters by-right (no discretionary review). This amendment was adopted by the City Council in December 2022 and took effect in January 2023 (see Municipal Code Section 17.16.111(B)(8)).

Students

College students are typically income-limited individuals in need of inexpensive rental housing. Students from nearby California State Polytechnic University, Humboldt (CPH) and College of the Redwoods make up a small portion of Blue Lake's population. In 2019, 68 residents (7.5% of the total population) were enrolled in college or graduate school. Of these, 4 were between the ages of 18-24, indicating that the majority of residents enrolled in college were age 25 or older at that time. According the 2015-2019 ACS 5-Year Estimates, 52 of the 68 college students were female. Traditionally, college students between the ages of 18-24 reside in the less expensive section of the City's housing stock (for example, apartments, larger homes split into multiple units, accessory dwelling units, mobile homes, trailers, studios, etc.) or share single-family dwelling units. Considering that the majority of the City's student population is over the age of 25, they may not necessarily be as income limited and in need of smaller inexpensive housing units. Some of these individuals may live in family households in larger single-family dwelling units.

[2] https://humboldtgov.org/DocumentCenter/View/71341/20190220---HHHC-News-Release---Point-in-Time-Count-2019.

[3] https://humboldtgov.org/DocumentCenter/View/107776/20220621---HHHC-Point-in-Time-Count-2022.

Housing Resources and Opportunities

This section includes an evaluation of the availability of land resources, financial resources for future housing development, the City's ability to satisfy its share of the region's future housing needs, and the financial resources available to assist in implementing the City's housing programs. Additionally, this section examines opportunities for energy conservation.

Regional Housing Need

The Regional Housing Needs Allocation (RHNA) is a minimum projection of housing units needed to accommodate projected household growth at all income levels by the end of the housing element's statutory planning period.

Table 19 shows the City's regional housing need by income for the projection period beginning December 31, 2018, and ending August 31, 2027.

Table 19: Regional Housing Need, 2019–2027

Income Group	Total RHNA
Very Low*	7
Low	4
Moderate	5
Above Moderate	7
Total	23

Source: City of Blue Lake, February 2022
**Note – it is assumed that 50% of the very low income RHNA is allocated towards extremely low income.*

Unaccommodated Need

The City of Blue Lake did not adopt a Housing Element for the 5th cycle and therefore has an unaccommodated need of 4 very-low-income units and 1 low-income unit (see Table 20).

Table 20: Unaccommodated Regional Housing Need, 2014–2019

Income Group	Total RHNA
Very Low	4
Low	1
Moderate	2
Above Moderate	4
Total	11

Source: City of Blue Lake, February 2022

Adequate Sites Inventory and Analysis

This section addresses the requirements of Government Code Sections 65583 and 65583.2 for a parcel-specific inventory of appropriately zoned, available, and suitable sites that can provide realistic opportunities for the provision of housing to all income segments within the community.

Available Sites

As shown in **Table 21** - Inventory of Vacant Land Available for Residential Development below, as of February 2022 there remained approximately 20 vacant, residentially or mixed-use zoned lots (R-1, PDR, MU, or O) within City boundaries. Vacant parcels are shown in **Figure 1**. The sites shown in **Figure 1** and listed in **Table 21** are categorized into three categories, likely developable (green), questionably developable (yellow), and likely not developable (red). The likely developable category (green) includes sites that do not have any known constraints that would preclude residential development and have adequate access to services and utilities. The questionably developable category (yellow) includes sites that have constraints (e.g., lot shape, lot size, topography, etc.) that are expected to significantly reduce the development potential and/or substantially increase the cost of developing the site. The likely not developable category (red) includes sites that have severe constraints (e.g., topography, creek corridor and setbacks, wetlands and setbacks, lack of access, etc.) that are anticipated to eliminate any development potential. Site capacity has been adjusted based on these site constraints. For the purposes of determining whether the City has adequate sites to meet its share of the regional housing need for the 5th and 6th planning cycle periods, only the vacant sites identified as likely developable are considered (see **Table 23**).

Yellow sites are as follows:	Red Sites are as follows:
• 025-041-042 • 025-131-020	• 025-052-002 • 025-76-003 • 025-084-008 • 025-111-006

The larger sites in the Planned Development Residential (PDR), Mixed-Use, and Opportunity (O) zones are the primary sites that could accommodate higher density multi-family units and improvements. The remaining lots are mostly less than 10,000 square feet and could accommodate between 1 to 4 units (see **Table 21**).

In addition to the vacant parcels in the City, there are a number of underutilized lots that could be further developed with residential uses including higher density multi-family units and improvements. Several of the lots in the PDR and O zones could be further subdivided for the purposes of creating more developable parcels. As shown in **Table 22** – Inventory of Underutilized Land Available for Residential development, as of February 2022 there are approximately 24 underutilized, residentially or mixed-use zoned lots (R-1, R-3, PDR, MU, O, or HC). Underutilized parcels are shown in **Figure 2**. The sites shown in **Figure 2** and listed in **Table 22** are categorized into two categories, likely developable (green) and questionably developable (yellow). Site capacity has been adjusted based on the configuration of existing development and various site constraints (for example, irregular shape, wetlands and drainages, access, etc.). For the purposes of determining whether the City has adequate sites to meet its share of the regional housing need for the 5th and 6th planning cycle periods, the underutilized sites are not considered. The underutilized sites are identified in this element to provide a more comprehensive understanding of the sites in the City with residential development potential.

Realistic Capacity Determination

The City considered and evaluated the implementation of its current development standards and site and regulatory constraints to determine the realistic unit capacity for each site (see Table 21). Maximum unit capacity for each site was determined by multiplying the number of acres by the maximum density for the site. Where a maximum unit capacity was one unit, the realistic capacity was also calculated as one unit, which was the case for most of the R-1 and PDR zoned sites. For APN 025-121-008 in the PDR zone, the realistic unit capacity was determined to be 8 units (62% of the maximum unit capacity) due to site and regulatory constraints specific to the site. For the MU zoned sites (i.e., APNs 025-071-012, 025-076-006, and 025-141-007), a range of approximately 17 to 50 percent of the maximum unit capacity was used as the realistic unit capacity to account for site and regulatory constraints specific to each site.

For the sites that were rezoned O by the City in 2021 (i.e., APNs 025-201-023, 312-161-015, and 312-161-018), a range of approximately 15 to 60 percent of the maximum unit capacity was used as the realistic unit capacity to account for site and regulatory constraints specific to each site. The constraints and realistic capacity determinations for each O zoned site are discussed further below.

- APN 025-201-023: This 1.44-acre site could accommodate 25 residential units if developed at the maximum density allowed in the zone (1 unit per 2,500 square feet). However, due to site and regulatory constraints, 48 percent of that result was used as the realistic unit capacity (12 units). The site constraints include the need for improved access for internal circulation and parking. The regulatory constraints include, but are not limited to, development standards that require the provision of open space, setbacks from the creek trail system, and reduced building heights in proximity to the creek trail system.
- APN 312-161-015: This 4.56-acre site could accommodate 79 residential units if developed at the maximum density allowed in the zone (1 unit per 2,500 square feet). However, due to site and regulatory constraints, 60 percent of that result was used as the realistic unit capacity (48 units). The site constraints include the need for improved access for internal circulation and parking, as well as the location of a City trail and road section within the parcel. The regulatory constraints include, but are not limited to, development standards that require the provision of open space, setbacks from the creek trail system, and reduced building heights in proximity to the creek trail system.
- APN 312-161-018: This 3-acre site could accommodate 52 residential units if developed at the maximum density allowed in the zone (1 unit per 2,500 square feet). However, due to site and regulatory constraints, 15 percent of that result was used as the realistic unit capacity (8 units). The site constraints include the need for improved access for internal circulation and parking as well as the location of a City trail and road section within the parcel. Additionally, the City is proposing the development of a bike park on the western portion of the site. The regulatory constraints include, but are not limited to, development standards that require the provision of open space, setbacks from the creek trail system, and reduced building heights in proximity to the creek trail system.

Recent development trends have shown that due to the significant demand for housing in the Humboldt Bay region, applicants typically propose residential uses at the maximum density allowed in the residential zones (e.g., R-1, R-3, and PDR zones). For similar reasons, projects proposed in the mixed-use zones (e.g., MU zone) typically focus on residential uses. The City has yet to see a 100 percent nonresidential development proposed in a mixed-use zone. Local applicants, developers, and realtors indicate that a mixed-use project (residential/commercial) in Blue Lake must include residential uses at or near the maximum density allowed by the zoning to be financially feasible.

In addition, the City does not typically receive applications that propose to develop housing at densities below those projected. The realistic capacity determination for sites zoned R-1, PDR, and MU is based on recent development trends and project approvals in these zones. For the larger sites in the Powers Creek District that were recently rezoned O, a conservative realistic unit capacity (i.e., 15 to 60 percent of the maximum unit capacity) was used because accurate development potential is harder to predict on these sites due to their size and the site and regulatory constraints specific to the Powers Creek District and the O zone.

To ensure housing development in the City is occurring at the projected densities consistent with the income categories anticipated, the City will annually review building development on the vacant and likely developable sites included in the sites inventory of this element. If the annual review shows that sites are not providing sufficient opportunities for housing affordable to lower-income households, the City will review its Zoning Code to consider other measures, including the adoption of incentives or regulatory mechanisms to encourage construction at the mid-point or higher end of the density range. These measures could include but are not limited to: 1) requiring a minimum residential density; and 2) density bonuses (i.e., specifying development standards that may be modified to make units more affordable – reduced lot sizes, increased ground coverage, etc.). The requirement to conduct an annual review of site development has been included as Program HI-23 in this element.

Table 21: Inventory of Vacant Land Available for Residential Development

APN	Acreage	GP Des.	Zoning	Max. Allowable Density	Realistic Unit Potential	Site Constraints	RHNA Category Met
025-025-010	0.15	MD	R-1	Single-family 1 unit/ 6,000 sf	1	Lot size	Above Moderate
025-035-007	0.17	MD	R-1	Single-family 1 unit/ 6,000 sf	1	Existing driveway, slope	Above Moderate
025-035-009	0.24	MD	R-1	Single-family 1 unit/ 6,000 sf	1	Creek setback	Above Moderate
025-041-030	0.14	MD	R-1	Single-family 1 unit/ 6,000 sf	1	--	Above Moderate
025-041-042	0.24	MD	R-1	Single-family 1 unit/ 6,000 sf	1	Easement, sloped	Above Moderate
025-052-002	0.31	MD	R-1	Single-family 1 unit/ 6,000 sf	0	Creek corridor, creek setback, sloped, riparian habitat, access	--
025-062-012	0.17	MD	R-1	Single-family 1 unit/ 6,000 sf	1	--	Above Moderate
025-084-008	0.13	MD	R-1	Single-family 1 unit/ 6,000 sf	0	Slope, lot shape	--
R-1 Total	1.55				6		
025-111-006	0.29	MD	PDR	Single-family 1 unit/ 6,000 sf	0	Wetlands, riparian habitat	--
025-121-008	1.88	MD	PDR	Single-family 1 unit/ 6,000 sf	8	--	Moderate
025-121-027	0.21	MD	PDR	Single-family 1 unit/ 6,000 sf	1	--	Above Moderate
025-121-032	0.15	MD	PDR	Single-family 1 unit/ 6,000 sf	1	--	Above Moderate

APN	Acreage	GP Des.	Zoning	Max. Allowable Density	Realistic Unit Potential	Site Constraints	RHNA Category Met
025-131-020	0.06	LD	PDR	Single-family 1 unit/ 6,000 sf	1	Lot size	Moderate
PDR Total	2.59				11		
025-071-012	0.15	MU	MU	Multi-family 1 unit/ 2,500 sf	1	Access	Above Moderate
025-076-003	0.16	MU	MU	Multi-family 1 unit/ 2,500 sf	0	Creek corridor, creek setback	--
025-076-006	0.17	MU	MU	Multi-family 1 unit/ 2,500 sf	1	--	Above Moderate
025-141-007	1.34	MU	MU	Multi-family 1 unit/ 2,500 sf	4	Lot shape, creek corridor, creek setback, riparian habitat, flood zone	Above Moderate
MU Total	1.82				6		
025-201-023	1.44	MU	O	Multi-family 1 unit/2,500 sf	12	--	Moderate
312-161-015	4.56	MU	O	Multi-family 1 unit/2,500 sf	48	Creek corridor, creek setback, trail, and City road	Lower
312-161-018	3.0	MU	O	Multi-family 1 unit/2,500 sf	8	Creek corridor, creek setback, trail, City road, and proposed parkland	Lower
O Total	9				68		
Grand Total	14.96				91		
Likely Developable Total					89		Lower – 56 Moderate – 20 Above Moderate - 13

Source: City of Blue Lake, June 2023

Table 22 – Inventory of Underutilized Land Available for Residential Development

APN	Acreage	GP Des.	Zoning	Max. Allowable Density	Realistic Unit Potential	Site Constraints	RHNA Category Met
025-022-010	0.47	MD	R-1	Single-family 1 unit/ 6,000 sf	1	Location of existing improvements, access	Moderate
025-032-005	0.31	MD	R-1	Single-family 1 unit/ 6,000 sf	1	Existing development requiring demolition	Moderate
025-041-006	0.83	MD	R-1	Single-family 1 unit/ 6,000 sf	1	Location of existing improvements, access	Moderate
025-041-015	0.74	MD	R-1	Single-family 1 unit/ 6,000 sf	1	Location of existing improvements, access	Moderate
025-063-008	0.25	MD	R-1	Single-family 1 unit/ 6,000 sf	1	Location of existing improvements, lot shape	Moderate
025-064-005	1.14	MD	R-1	Single-family 1 unit/ 6,000 sf	1	Requires subdivision for further development, location of existing improvements, access	Moderate
025-064-009	1.53	MD	R-1	Single-family 1 unit/ 6,000 sf	10	Requires subdivision for further development, zoning	Moderate
025-071-011	0.30	MD	R-1	Single-family 1 unit/ 6,000 sf	1	Location of existing improvements	Moderate
025-084-018	0.15	MD	R-1	Single-family 1 unit/ 6,000 sf	1	Creek, creek setback, access	Above Moderate
025-181-010	1.02	MD	R-1	Single-family 1 unit/ 6,000 sf	6	Location of existing improvements, creek setback, access	Moderate
025-181-012	1.37	MD	R-1	Single-family 1 unit/ 6,000 sf	1	Requires subdivision for further development, Llocation of existing improvements, creek setback, access	Moderate

APN	Acreage	GP Des.	Zoning	Max. Allowable Density	Realistic Unit Potential	Site Constraints	RHNA Category Met
025-191-015	0.52	MD	R-1	Single-family 1 unit/ 6,000 sf	1	Location of existing improvements, access	Moderate
R-1 Total	8.63				26		
025-082-011	0.62	MF	R-3	Multi-family 1 unit/ 2,000 sf	4	Wetlands, access, utilities	Moderate
R-3 Total	0.62				4		
025-101-007	1.28	MD	PDR	Single-family 1 unit/ 6,000 sf	4	Wetlands, wetland setback, access	Moderate
025-101-013	1.14	MD	PDR	Single-family 1 unit/ 6,000 sf	1	Wetlands, wetland setback, access, location of existing improvements	Moderate
025-111-007	4.7	MD	PDR	Single-family 1 unit/ 6,000 sf	8	Wetlands, wetland setback, location of existing improvements	Moderate
025-121-043	4.62	MD	PDR	Single-family 1 unit/ 6,000 sf	20	Location of existing development, access, zoning	Moderate
025-141-011	0.20	MD	PDR	Single-family 1 unit/ 6,000 sf	1	Lot shape, access	Moderate
PDR Total	11.94				34		
025-075-028	0.30	MU	MU	Multi-family 1 unit/ 2,500 sf	2	Location of existing improvements, access	Moderate
025-081-006	0.16	MU	MU	Multi-family 1 unit/ 2,500 sf	1	Lot size, access, slope	Moderate
025-083-016	0.29	MU	MU	Multi-family 1 unit/ 2,500 sf	1	Location of existing improvements, lot shape	Moderate
MU Total	0.75				4		
025-201-018	0.74	MU	O	Multi-family 1 unit/ 2,500 sf	12	Location of existing improvements, access	Lower and Moderate

APN	Acreage	GP Des.	Zoning	Max. Allowable Density	Realistic Unit Potential	Site Constraints	RHNA Category Met
312-161-020	26.6	MU	O	Multi-family 1 unit/ 2,500 sf	70	Location of existing improvements, creek, creek setback, floodplain, riparian habitat	Lower and Moderate
O Total	27.34				82		
025-111-001	0.75	C	HC	Single-family 1 unit/ 6,000 sf	2	Slope, access, zoning	Moderate
HC Total	0.75				2		
Grand Total	50.03				152		

Source: City of Blue Lake, February 2022

Figure 1 – Vacant Sites Inventory

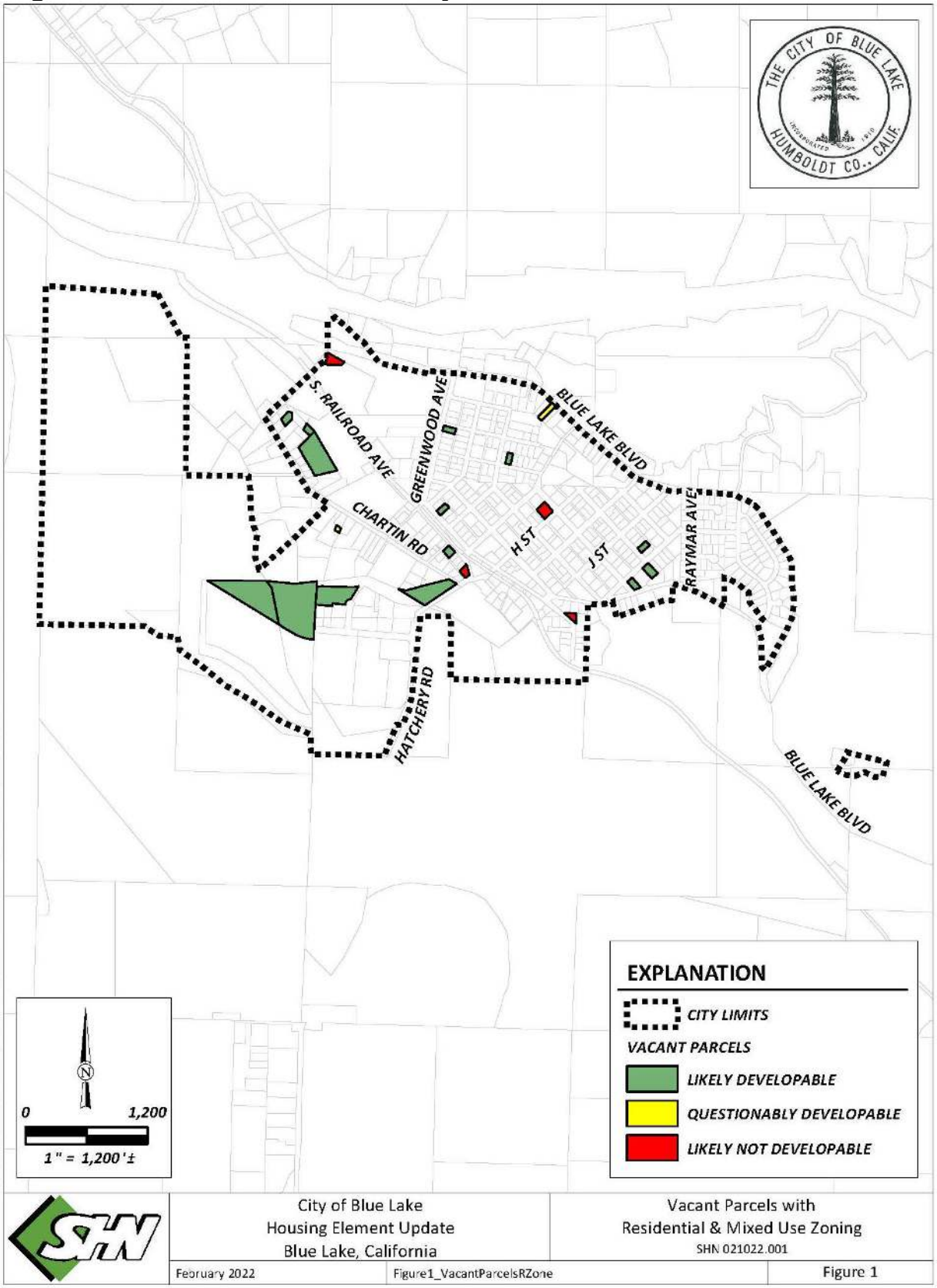
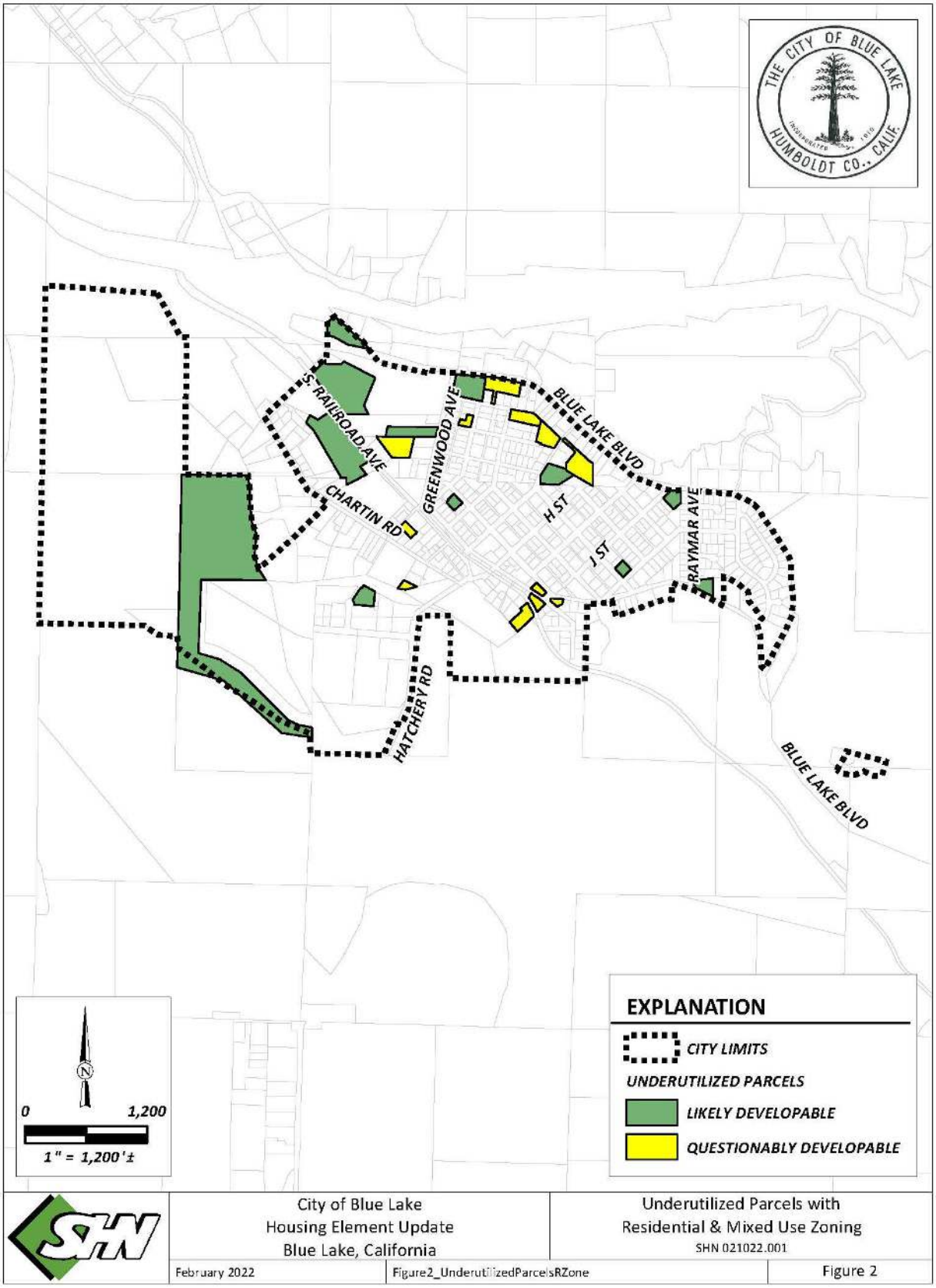


Figure 2 – Underutilized Site Inventory



Alternate Affordable Housing Options

Another option to meet a portion of the City's RHNA is through accessory dwelling units (ADU) and junior accessory dwelling units (JADU). ADUs are permitted on lots that are a minimum of 6,000 square feet (.14 acres). Table 21 and Table 22 identify thirteen sites that are of that size or larger and could accommodate an ADU. In the last few years, the City has observed a significant increase in interest in the development of ADUs. It is believed that this increased interest is due to the recent changes in State law that have incentivized the production of ADUs. It is important to note that during the 5th cycle planning period, the City's ADU regulations were determined by HCD to be "null and void" due the numerous inconsistencies with State regulations. Since that time, the City has deferred to current State regulations for ADUs. The City has contacted HCD (adu@hcd.ca.gov) on several occasions to ask questions and receive clarification to ensure that State ADU regulations were being properly implemented in the City.

Currently, the City receives at least one inquiry per month regarding the potential for construction of an ADU. These inquiries primarily relate to the development of new, detached ADUs or the conversion of existing accessory buildings to ADUs. As such, it is anticipated that several ADUs will be developed during the remainder of the planning period. Based on the recent trends and nature of this type of unit's affordability, the City has assumed a credit of one unit towards meeting the low-income RHNA and two units towards meeting the moderate-income RHNA. This projection assumes the development of less than one ADU annually for the remainder of the planning period. The City has also considered the possibility of relying on JADUs as another affordable housing option, which will allow for additional capacity towards meeting the City's lower income RHNA.

Both of these options give homeowners the flexibility to share independent living areas with family members and others, allowing seniors to age in place as they require more care and helping extended families to be near one another while maintaining privacy. Relaxed regulations and the cost to build an ADU make it a very feasible affordable housing option. In the City of Blue Lake and nearby communities, conversion of large single-family homes, similar to creating a JADU, to multiple units seems to be a trend that allows for an affordable housing option in areas where affordable is not common.

Currently, there are 369 single-family homes in the City (Table 12). Based on trends from surrounding comparable jurisdictions and the limited number of inquiries received by the City regarding JADUs, the City has taken a conservative approach and assumed that one single-family unit (less than 0.3 percent of the total units) would allow for a low-income JADU during the planning period.

In total, it is projected that two low-income ADUs/JADUs and two moderate-income ADUs will be developed during the remainder of the planning period (see Table 23). To ensure the City's ADU standards are compliant and remain compliant, the City has included Program HI-1 to amend the Zoning Code to cite/reference State law for ADUs. To address the potential for the lack of ADU production during the planning period, the City has included Program HI-17 which commits the City to taking additional actions to incentivize ADU production. The additional actions could include but are not limited to 1) conducting outreach to inform the public about current State law for ADUs and the benefits of ADU development; 2) amending the Zoning Code to incorporate ADU standards that are more permissive than current State law; or 3) rezoning sites in the City that have non-residential zoning to zones allowing residential development.

Meeting the Regional Housing Need

Table 23 compares the City of Blue Lake's RHNA for the 5th and 6th cycle planning periods to the available site inventory capacity.

The City has a surplus of 42 units available to lower-income households (including extremely low–, very-low, and low-income households), a surplus of 15 units available to moderate-income households, and a surplus of 2 units available to above moderate-income households.

Table 23: Comparison of Regional Growth Need and Residential Sites

Income Group	2014-2019 RHNA	2019–2027 RHNA	ADU/JADU Capacity	Site Capacity[1]	RHNA Surplus
Very Low	4	7	2	56	42
Low	1	4			
Moderate	2	5	2	20	15
Above Moderate	4	7	--	13	2
Total	**11**	**23**	**4**	**89**	**59**

Source: City of Blue Lake, June, 2023

[1] The site capacity only includes the capacity on vacant sites identified as likely developable (see **Table 21**).

Site Constraints

Circulation Infrastructure

The majority of vacant or underutilized land in Blue Lake exists in larger (>1-acre) parcels that could be divided or developed further with the installation of adequate internal access roads. Off-site access improvements may also be required in order to adequately increase road capacities to a safe level. For example, South Railroad Avenue is a one-way road that provides access to the larger, PDR-zoned parcels in the western portion of the City. This road section is substandard and would need to be upgraded in order to accommodate the traffic from residential buildout in this portion of the City.

Service Infrastructure

Most parcels in Blue Lake have adjacent utility infrastructure that is adequate to serve residential buildout under the General Plan. The exceptions include the following: 1) a sewer mainline extension would be required to serve parcels along Hatchery Road between the Downtown and Powers Creek District; 2) a sewer mainline extension would be required to serve the parcels towards the end of Taylor Way in the Powers Creek District; 3) there is inadequate stormwater infrastructure in many areas of the City that results in localized flooding during winter storm events.

Water and Sewer Capacity

Wastewater

The Blue Lake wastewater system serves approximately 1,255 customers. The service area includes the City of Blue Lake (business and residential), the Powers Creek District (formerly Blue Lake Business Park), the Blue Lake Rancheria Hotel and Casino, and 45 residents located outside of city limits. Of these connections, 23 are industrial, including the Mad River Brewery and the Blue Lake Rancheria.

City wastewater responsibilities include the wastewater treatment plant, the sewer mains, manholes, lift stations, and two pump stations that make up the sewer collection system. The collection system covers an

approximate service area of 0.6 square miles and includes more than 16 miles of sewer pipe. The City reports that wet weather flows in the form of infiltration/inflow (I & I) contributes a large amount of the total annual flow to the sewer collection system. The City's I & I can be as much as six times the average summer flow during major winter storm events. Significant portions of the City's collection system are in need of repair and/or replacement due to excessive I & I. The Public Works department has an informal plan that has been developed for implementing improvements based on the City staff's visual observations of needed repairs.

The Blue Lake wastewater treatment plant (WWTP) is in the northwest corner of the City near the flood plain of the Mad River. The WWTP is a primary headworks facility followed by a 7.5-acre, 4-cell secondary treatment lagoon system, a chlorine disinfection system, and 2 effluent disposal percolation ponds. The WWTP has an average dry weather flow (ADWF) of 0.18 MGD. To date, the system has not experienced any sewer overflow events. In 2013 the City received recognition from the California Water Environment Association with a Wastewater Treatment Plant of the Year Award for the North Coast region.

Wastewater system best practices include ensuring the hydraulic capacity of key sanitary sewer system elements for dry weather peak flow conditions, as well as the appropriate design storm or wet weather event. The wastewater treatment capacity is 1 million gallons per day (MGD). The system is designed for average flows of 0.25 MGD and peak flows of 1.54 MGD. The City's average dry weather flows are currently 0.15 MGD. In 2013, the city adopted an Interim Policy Pertaining to the Release of Sewer Capacity. It determined that it had a remaining unallocated sewer capacity equal to 100 residential equivalent units (REUs). Of the estimated remaining REUs, 60 REUs were reserved then for residential connections, including both single- and multi-family uses, and 40 REUs were then made available for non-residential use. Non-residential development requests for use of sewer capacity may be approved by the City Manager, if equal to or less than one REU. Requests that exceed one REU must be approved by the City Council.

According to the City Engineer, the remaining wastewater treatment capacity is anticipated to be used by the approved (not constructed yet) and proposed development projects in the City. Therefore, improvements to the City's wastewater treatment facility will be required in order to have adequate capacity to serve the residential buildout identified in Table 21 and Table 22. As identified in the City's Capital Improvement Plan, these improvements include electrical panel upgrades and the installation of two (2) 5 horsepower aerators, which are anticipated to provide an additional 180 residential equivalent units (REUs). To address the potential for insufficient wastewater treatment capacity during a portion of the planning period, the City has included Program HI-18 which commits the City to construction of the wastewater treatment plant improvements within two years of adoption of the Housing Element. This implementation schedule will ensure there is sufficient wastewater treatment capacity available during the planning period for development on the vacant and likely developable sites identified in the sites inventory of this element.

Water Supply

The City of Blue Lake obtains all of its domestic water supply through a contract with the Humboldt Bay Municipal Water District (HBMWD). Water is delivered to the city via a booster pump station northwest of the City on Glendale Drive. The City's water system includes two redwood water storage tanks, transmission mains, fire hydrants, valves, and the water services from the mains to individual water meters. The City owns and operates the booster pump station on Glendale Drive, which pumps water through a single pipe into the City's main distribution system to a pressure needed to fill two storage tanks. The distribution system consists of 51,050 feet of pipeline which is mostly asbestos cement, installed in the early 1970s. The booster station pumps water into town and the water that is not used flows through the system and into the City's storage tanks. The City has two redwood storage tanks with a total storage capacity of 900,000 gallons. The tanks each have a single inlet/outlet pipe.

The City's daily use allotment is currently 400,000 gallons, established via the contract with HBMWD. During the 2017-18 Fiscal Year, the City reported an average use of 204,712 gallons per day (gpd), 51% of their daily allotment from HBMWD. In the same year, during the peak use month of August, city water customers utilized an average of 244,900 gallons per day or 61% of the 400,000 gpd allotment from HBMWD. The City reports that the 2017-18 water use was higher than average due to an ongoing water leak. Once addressed, city water use is anticipated to decrease. The City's main constraint regarding water therefore is not supply or storage, but a lack of infrastructure (mainline connections). Based on the City's daily use allotment in their contract with HBMWD (400,000 gallons) and the current demand from existing development in the City (daily average of less than 250,000), there is sufficient water supply to serve the vacant and likely developable sites identified in the sites inventory of this element.

Stormwater Infrastructure

The stormwater system in the City is currently inadequate and the location, sizing, and condition of all stormwater infrastructure is unknown. A large portion of the City of Blue Lake's stormwater infrastructure dates back to the 1950s and 60s and will need to be serviced or replaced in the foreseeable future.

The City is not located in a Phase II Small MS4 Permit area in Humboldt County and has not adopted its own stormwater regulations. Onsite and offsite stormwater improvement requirements for development projects are applied on a project specific basis. This provides a high degree of uncertainty for developers and often causes significant delays in the permitting process. Protecting water quality is very important in the City of Blue Lake since the City is directly adjacent to the Mad River and is the largest municipality upstream of the intake wells for the Humboldt Municipal Water District System that provide water to over 80,000 people in the Humboldt Bay area.

To address the inadequacy of the City's stormwater system and lack of stormwater regulations, the City will be using funding from the Local Early Action Planning (LEAP) program to map existing stormwater infrastructure and develop stormwater regulations for the Municipal Code. The identification of the location and condition of existing stormwater infrastructure will allow the City to identify areas in need of repair and improvement, which will increase the City's ability to apply for grant funding for stormwater infrastructure upgrades. It is anticipated that the proposed stormwater regulations would require the following: 1) compliance with regulations similar to those required under the Phase II Small Municipal Separate Storm Sewer System (MS4) Program including compliance with the Humboldt Low Impact Development Stormwater Manual; 2) the payment of stormwater drainage fees to be used for the improvement, operation, and maintenance of stormwater drainage facilities. The proposed stormwater regulations would require new development to install onsite stormwater management facilities to ensure that the volume and rate of post-construction stormwater runoff does not exceed pre-construction conditions and adversely impacts the City's existing stormwater infrastructure.

Seismic / Slope Conditions

Seismicity

The City of Blue Lake lies within a geographic region laden with numerous seismic faults and shear zones. The entire northern coast of California is subject to seismic activity, due mainly to the proximity of the Mendocino Triple Junction (MTJ). Multiple tectonic plates (pieces of the Earth's crust) collide off the coast of northern California and southern Oregon to form the MTJ. In particular, this is where the San Andreas Fault meets the Cascadia Subduction Zone (CSZ), a 750-mile-long thrust fault capable of producing a megathrust quake of magnitude 9.0 or more. The tectonic activity most relevant to Humboldt County is the movement of the Gorda and Juan de Fuca plates underneath the North American plate. This movement causes the Earth's crust to compress and break, resulting in an extensive system of onshore faults and frequent offshore earthquakes. The

City of Blue Lake is located in close proximity to United States Geologic Survey mapped faults in the Mad River Fault Zone and is vulnerable to shaking caused by a rupture of any of these faults. The closest Alquist Priolo Zone to the City is approximately 0.75 miles southwest on the eastern side Fickle Hill.

Most local earthquakes originate offshore, within tectonic plates rather than along plate boundaries. The Gorda plate is most susceptible to seismic activity because it undergoes a large amount of stress, and consequent fragmentation, as it is pushed beneath the North American plate. Offshore, intraplate quakes are generally less damaging to human communities than onshore quakes, but they can still be quite large. The type of potentially damaging quake most likely to occur would be centered offshore with a magnitude between 5.0 and 7.5. Onshore earthquakes are less probable, having an average recurrence interval of 20 years. This type of quake could have a magnitude of 7.5 to 8.0, which would be more intense, and more damaging, than any modern historic quake. Although most earthquakes in the region originate offshore within the Gorda plate, they can also occur on the CSZ boundary. Evidence of prehistoric subduction zone earthquakes suggests that they could have magnitudes of 8.0 to 9.0 or more on an interval of every 300 to 600 years; the most recent one occurred in 1703. There is little that can be done to prepare for and mitigate damage from a large CSZ quake other than warning and evacuation systems.

The general risks associated with earthquakes in the Blue Lake area are structural damage, slope failures, and liquefaction. These risks tend to be greater in areas of unstable slopes, wet conditions, alluvial deposits, or fill material. Blue Lake is not at risk of potential tsunami damage or inundation due to its inland location.

Stability

Mass movement of material on hillsides is a major accompaniment of moderate and strong earthquakes. These can take the form of landslides, rock avalanches, mud and debris flows, or another type of slope failure. Areas north of the City, and along U.S. Highway 299 are considered to be at high risk of slope failure, but are determined to not be hazardous to the population within Blue Lake City limits. The majority of the current townsite is in lowland areas characterized by stable gradual slopes and are not at risk of slope failure. There is potential for liquefaction, lurching, cracking, and differential subsidence within the City.

Flood Hazards / Wetlands / Creeks

Flood Hazards

A portion of the City of Blue Lake has been mapped within the 100- and 500-year flood plains of the Mad River and Powers Creek. It is important to note that the city is largely protected by the levee along the Mad River. The levee is expected to withstand a 100-year flood event. Powers Creek, which runs through the center of town, has created flood problems in the past. This flooding occurred largely between the former railroad corridor and the Mad River, where the flood plain spreads out. Projects that propose development in the 100-year flood plain must obtain a Flood Development Permit and comply with the requirements of the City's floodplain management regulations in Municipal Code Chapter 13.20 (Floodplain Management). With the exception of a portion of APN 025-141-007, all of the properties identified in the sites inventory identified as vacant and likely developable are located outside of the 100-year flood plain for the Mad River and Powers Creek. The realistic capacity determination for APN 025-141-007 has been adjusted to account for the flooding constraints on this site.

The City is also at risk of flooding resulting from a failure of the upstream R.W. Matthews Dam. The Humboldt Bay Municipal Water District (HBMWD) is responsible for the operation and maintenance of the dam. The HBMWD has prepared an Emergency Action Plan (EAP) for failure of the dam, which contains inundation mapping that identifies the potential downstream inundation areas. According to Figure 2.10 in the EAP, the lower lying areas in the City (e.g., south of First Avenue and west of Greenwood Road) would be inundated in

the event of dam failure. The majority of vacant, residentially-zoned land in the City is located within the mapped inundation area for the failure of R.W. Matthews Dam. According to Figure 2.10 in the EAP, in the scenario of dam failure during a record flood event, flood waters would first reach the City of Blue Lake in approximately 5 hours 30 minutes and the peak flow would occur within 6 hours 25 minutes. The EAP contains a Contingency Plan for Humboldt County that contains a detailed description of response operations that would be implemented in the case of dam failure.

Wetlands

A few of the underutilized parcels in the western portion of the City have areas that fall under the current federal definition of wetlands. These wetland areas have formed primarily because of runoff from Highway 299. The underutilized parcels that have the largest wetland areas include APNs 025-101-007, 025-101-013, and 025-111-007. As noted in sites inventory in this element, these underutilized sites are not considered in determining whether the City has adequate sites to meet its share of the regional housing need. The Blue Lake Municipal Code does not require setbacks from wetlands, but State regulatory agencies often recommend wetland setbacks when reviewing development proposals in the City. Wetland setbacks required when approving development proposals have ranged from no setback to 50 feet from the edge of the delineated wetland.

Creeks

There are several vacant or underutilized properties in the City that are located along Powers Creek. The City's Municipal Code requires a 50-foot setback from the centerline of Powers Creek in certain zoning districts, which limits the development potential of some of the properties located along the creek. For zoning districts that do not specify a creek setback requirement, State regulatory agencies often recommend setbacks when reviewing development proposals in the City. In these situations, the most common setback required when approving development proposals is a 25-foot setback from the top of the creek bank. The realistic capacity determinations for the sites identified as vacant and likely developable in this element have been adjusted to account for the varying creek setback requirements.

Dry Utilities

Dry utilities, including electricity, gas, internet, and telephone service, are available to most areas within the City. The extension of power and gas to service new residential development has not been identified as a constraint.

Service providers are as follows:

- Electricity: Redwood Coast Energy Authority Community Choice Energy Program, which is transmitted over the Pacific Gas and Electric Company (PG&E) electrical grid
- Gas: PG&E
- Internet: Suddenlink and AT&T
- Telephone: Suddenlink and AT&T

Affirmatively Furthering Fair Housing

Introduction

Pursuant to AB 686, municipalities are now required to ensure that their laws, programs, and activities affirmatively further fair housing (AFFH), and that they take no action inconsistent with this obligation. The California Department of Housing and Community Development defines AFFH as taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.

AB 686 adds several requirements to Housing Elements including: outreach, assessment of fair housing, site inventory, identification and prioritization of contributing factors, and goals and actions. Outreach efforts conducted by the City were almost exclusively conducted online during preparation of the draft Housing Element Update due to the COVID-19 pandemic. Multiple meetings and public hearings were held with the Planning Commission and City Council. The only comments received related to fair housing issues were from the Blue Lake Community Resource Center. Most comments provided by the public related to concerns about the potential impacts of growth in the community.

Assessing fair housing within the City of Blue Lake is made difficult by lacking, or incorrect data, however the State of California, United States Census, and American Community Survey provide some insights into community characteristics needed to assess fair housing. Components of assessing fair housing in Blue Lake include:

1. Summary of fair housing enforcement and outreach capacity;
2. Integration and segregation patterns, and trends related to people with protected characteristics;
3. Racially or ethnically concentrated areas of poverty;
4. Disparities in access to opportunity for people with protected characteristics, including persons with disabilities; and
5. Disproportionate housing needs within the jurisdiction, including displacement risk.

Fair Housing Enforcement and Outreach Capacity

The City of Blue Lake, Humboldt County, the Office of Fair Housing and Equal Opportunity, and California Department of Fair Employment and Housing (DFEH) all have active roles in enforcing fair housing within Blue Lake.

Residents of Blue Lake and Humboldt County have access to legal assistance through the Legal Services of Northern California (LSNC). Residents of any of the 23 northern California counties they serve are able to consult with their local LSNC office. LSNC currently serves tens of thousands of vulnerable people with issues relating to housing, government benefits, health, and other civil legal issues affecting low-income Californians.

The HCD Affirmatively Furthering Fair Housing Data Viewer (AFFH Viewer) indicates that between 2013 and 2021, Blue Lake had no fair housing and equal opportunity (FHEO) inquiries. Blue Lake is currently in compliance with existing fair housing laws and regulations; however, due to its lack of staff and funding, enforcement and outreach capacity is limited.

According to the California Department of Fair Employment and Housing 2020 Annual Report, 880 Housing complaint cases were filed, with 1,652 bases recorded (the total number of bases exceeds the total number of cases because a complaint may be filed on more than one basis). The largest basis category was disability with 650 (39.3 percent) reports filed. The annual report breaks down by county, where the complaints were filed. The table displays Humboldt County as having four housing related complaints filed. It is noted that the California DFEH does not make data readily available related to fair housing inquiries, specific concerns, and outcomes. If made available, this information would be invaluable to local jurisdictions, residents, and landlords in identifying areas with high incidences of fair housing concerns and opportunities for community education regarding specific topics of concern.

There appears to be adequate resources and capacity to respond to fair housing inquires, based on data available, however, the City and partner agencies should collaborate to increase outreach and educational opportunities to better inform City residents. The City should continue to ensure that the public is informed about fair housing rights and avenues to address any fair housing concerns. Additionally, the City should ensure that there is adequate staff training regarding fair housing practices, so the public may be best served by staff.

Integration and Segregation Patterns and Trends

There are a number of reasons why patterns of racial segregation exist (or don't exist) within a community. Some of these reasons may be institutional (discriminatory lending practices) while others can be cultural (persons of similar backgrounds or lifestyles choosing to live near one another to provide support and familiarity). As such, discussions regarding segregation are complicated and there is not a "one size fits all" approach to addressing patterns of racial segregation. Tracking the diversity of cities and counties throughout California is crucial to understanding the shifting demographics of race and ethnicity in California and the United States. Esri's Diversity Index captures the racial and ethnic diversity of a geographic area in a single number, from 0 to 100. Scores less than 40 represent lower diversity in the jurisdiction ,while scores of greater than 85 represent higher diversity. Additionally, scores between 40-55 represent low diversity, 55-70 represent moderate diversity, and 70-85 represent high diversity. As shown in **Figure 3**, there are two different diversity classifications throughout the City of Blue Lake. Most of the City falls under the 40-55 classification, however the eastern portion of the city is within the lower diversity classification.

Blue Lake is a small town in a rural part of California and as a result, it does not directly have neighboring cities to accurately compare itself to. When looking at the surrounding areas of Humboldt County, the diversity index scores as seen in **Figure 4**, mirror that of Blue Lake. Areas including portions of the cities of Arcata and Eureka have higher diversity index scores, however, their characteristics differ from the City of Blue Lake. These differences can be attributed to a number of different factors, including ancestral history, access to affordable housing, educational and employment opportunities, cultural and recreational facilities, and community preference. Unlike the cities of Arcata and Eureka, Blue Lake has limited job opportunities, does not have a college, and has little affordable housing development.

Figure 3 – Diversity Index (Blue Lake)

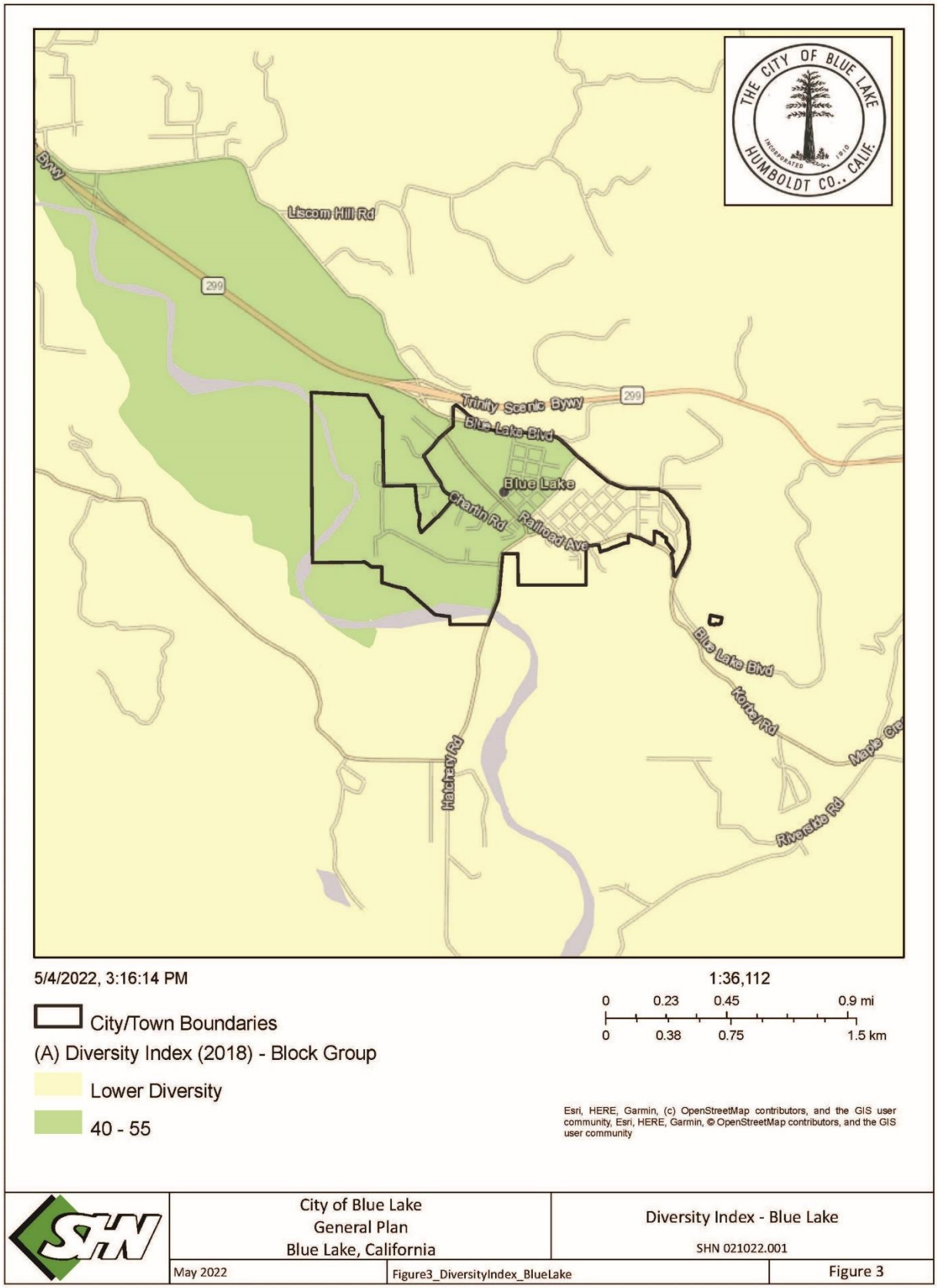
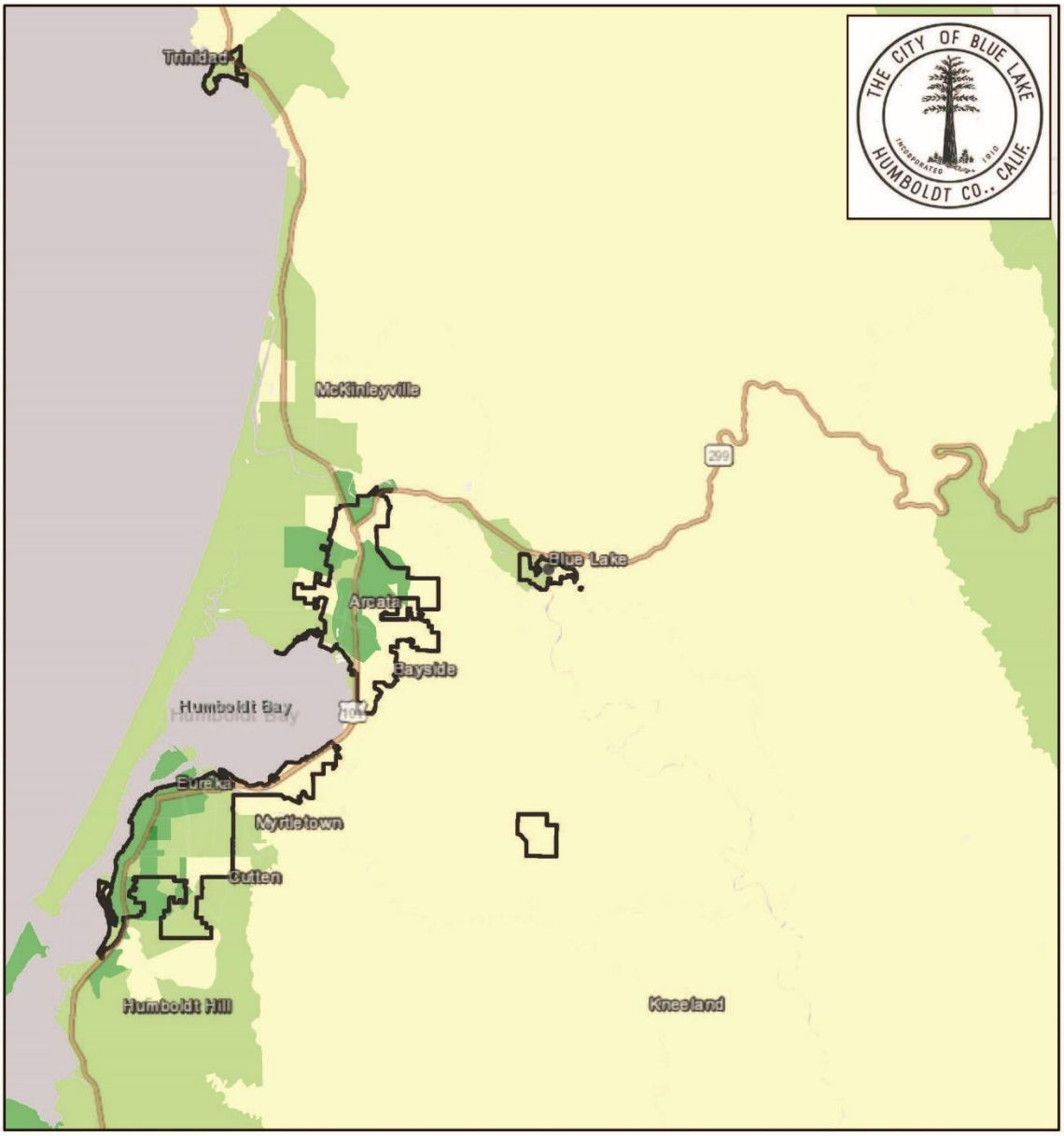


Figure 4 – Diversity Index (Humboldt County)



5/4/2022, 3:25:21 PM

1:288,895

0 1.75 3.5 7 mi

0 3 6 12 km

City/Town Boundaries

(A) Diversity Index (2018) - Block Group

Lower Diversity

40 - 55

55 - 70

70 - 85

Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community, Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community

SHN	City of Blue Lake General Plan Blue Lake, California	Diversity Index - Humboldt County SHN 021022.001
	May 2022	Figure4_DiversityIndex_HumboldtCounty	Figure 4

Racially or Ethnically Concentrated Areas of Poverty (R/ECAP) and Concentrated Areas of Affluence

Racially and Ethnically Concentrated Areas of Poverty (R/ECAP) are defined by HUD as having a racial and ethnic concentration. The threshold is that a RCAP or ECAP have a non-White population of 50 percent or more, within metropolitan or micropolitan areas. In locations outside these areas, where the non-White populations are likely to be much smaller than 50 percent, the threshold is set at 20 percent. The poverty test defines areas of "extreme poverty" as those where 40 percent or more of the population lives at or below the federal poverty line, or those where the poverty rate is three times the average poverty rate in the metropolitan area, whichever is less. An area that meets either the racial or ethnic concentration and also meets the poverty test would be considered a RCAP or ECAP; broadly referred to as R/ECAPs. No R/ECAP areas were identified in Blue Lake or Humboldt County.

Alternatively, the Department of Housing and Community Development together with the California Tax Credit Allocation Committee (TCAC) established the California Fair Housing Task Force to provide research, evidence-based policy recommendations, and other strategic recommendations to HCD and other related state agencies/departments to further the fair housing goals (as defined by HCD). The Task Force developed the 2021 TCAC/HCD Opportunity Area Maps to understand how public and private resources are spatially distributed. The Task force defines opportunities as pathways to better lives, including health, education, and employment. Overall, opportunity maps are intended to display which areas, according to research, offer low-income children and adults the best chance at economic advancement, high educational attainment, and good physical and mental health.

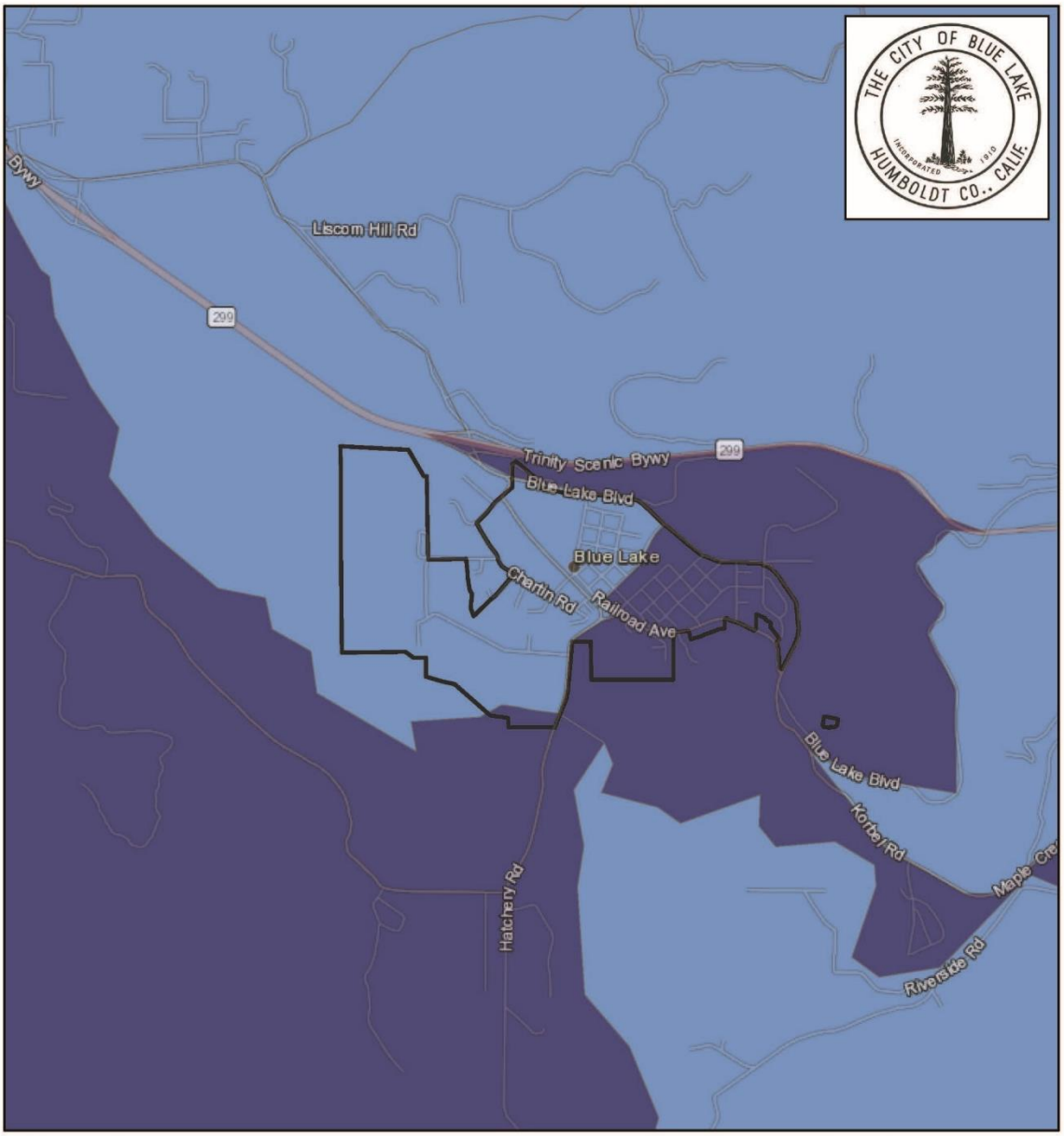
According to the Task Force's methodology, the tool allocates the 20 percent of the tracts in each region with the highest relative index scores to the "Highest Resource" designation and the next 20 percent to the "High Resource" designation. Each region then ends up with 40 percent of its total tracts as "Highest" or "High" resource. These two categories are intended to help State decisionmakers identify tracts within each region that the research suggests low-income families are most likely to thrive, and where they typically do not have the option to live—but might, if given the choice. The remaining tracts are then evenly divided into "Low Resources", "Moderate Resource", or "High Segregation & Poverty". As shown in **Figure 5**, the City of Blue Lake is classified as either "Highest Resource" or "High Resource."

Furter exploration of the demographic make-up of the City using Census block group data does not confirm that there is obvious segregation within the City, and there are data limitations that prevent accurate analysis of this fact. The American Community Survey (ACS) 2019 5-year estimates estimate the poverty rate in the City is 16.1 percent. This number is slightly lower that the California State average of 17.2 percent in 2019.

AB 686 requires cities to not only look at R/ECAP, but also Racially Concentrated Areas of Affluence (RCAAs). At the time of this element's creation, the RCAA tool is not yet operational on the AFFH webpage. Alternatively, looking at the Median income of Block Groups according to data from the 2015-2019 ACS, there are two income brackets: < $55,000 and < $87,100 displayed within the City. According to HCD, the 2020 State Median Income is $87,100. When looking at median income levels within Humboldt County bordering Blue Lake, it is clear from **Figure 6** that the income brackets found within Blue Lake are consistent with the rest of the region.

As indicated by the findings of ACS data and the TCAC/HCD Opportunity Maps, the City of Blue Lake's poverty rate is below the state average. The Data Viewer looking at the Poverty Status taken from ACS 2015-2019 data reaffirms these findings (see **Figure 7**). The City falls in the 10-20 percent of population whose income in the past 12 months is below the poverty level. The finding is consistent throughout the city.

Figure 5 – TCAC Opportunity Areas (Composite Score)



5/4/2022, 3:17:50 PM

1:36,112

0 0.23 0.45 0.9 mi

0 0.38 0.75 1.5 km

City/Town Boundaries

(R) TCAC Opportunity Areas (2021) - Composite Score - Tract

Highest Resource

High Resource

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SHN	City of Blue Lake General Plan Blue Lake, California	TCAC Opportunity Areas - Composite Score SHN 021022.001
	May 2022	Figure5_TCAC_OppAreasCompScore	Figure 5

Figure 6 – Median Income

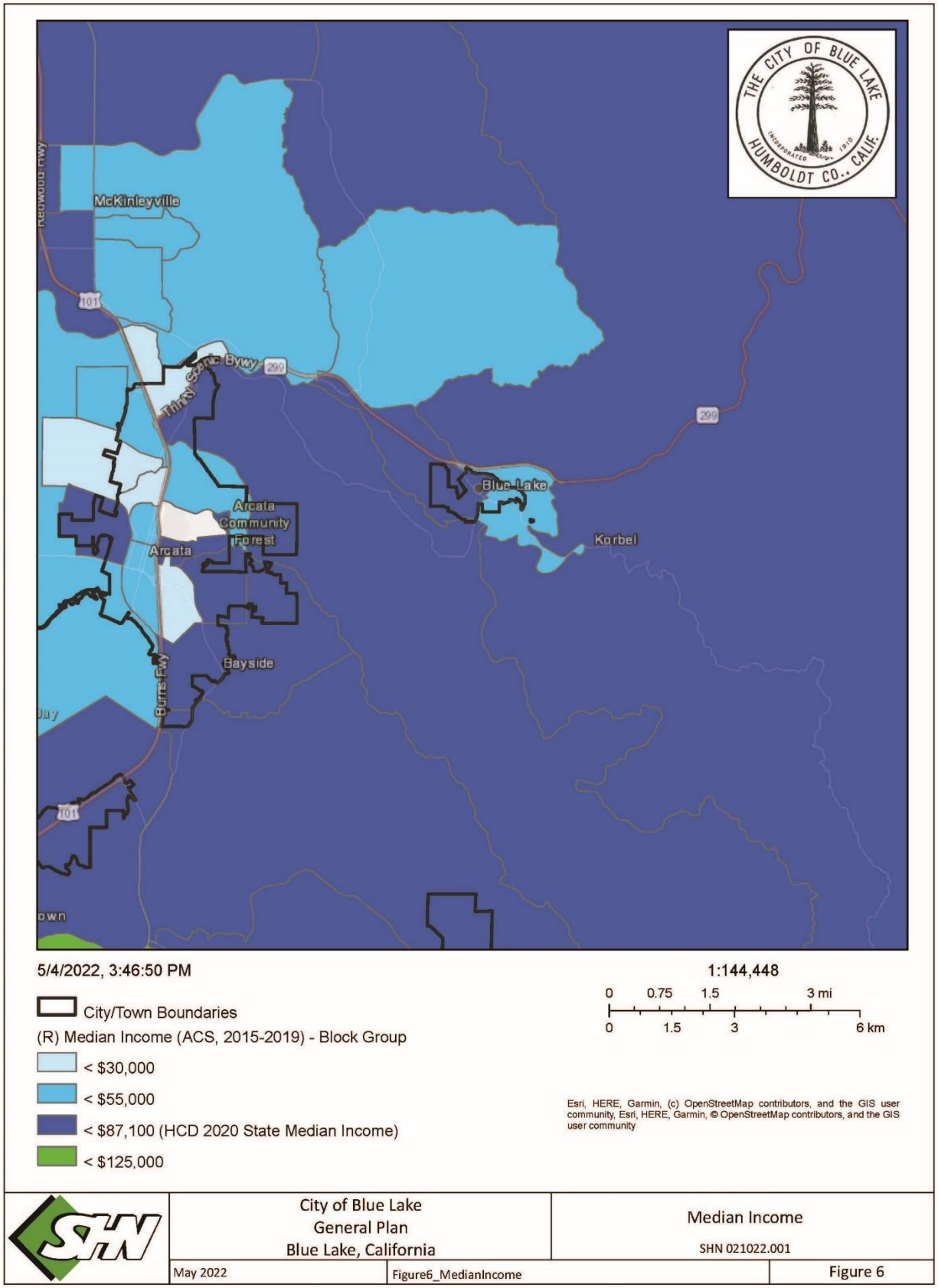
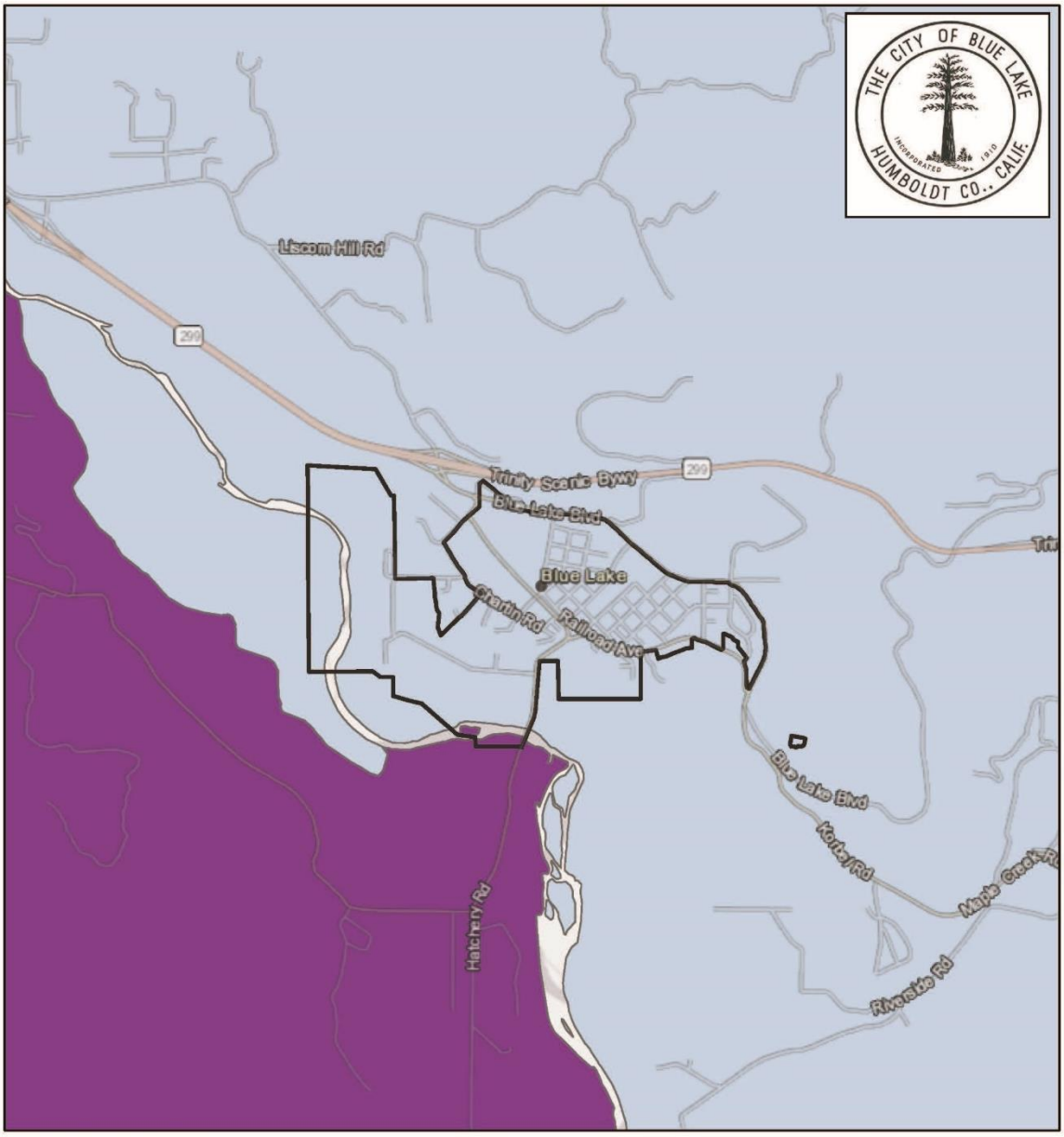


Figure 7 – Poverty Status



5/4/2022, 3:51:41 PM

1:36,112

0 0.23 0.45 0.9 mi

0 0.38 0.75 1.5 km

City/Town Boundaries

(R) Poverty Status (ACS, 2015 - 2019) - Tract

10% - 20%

30% - 40%

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City of Blue Lake General Plan Blue Lake, California		Poverty Status SHN 021022.001
May 2022	Figure7_PovertyStatus	Figure 7

Disparities in Access to Opportunity

Disparities in access to opportunity is a concept that links approximate place-based characteristics to critical life outcomes. These characteristics include but are not limited to: education, employment, transportation, and environment. The HCD Data viewer provides a number of mapping tools to view percentage overlays of different categories within cities.

Access to opportunity can often be challenging, especially in rural areas. **Figure 8** displays the (R)TCAC Opportunity Areas (2021) educational scores by census tract. Tracts are assigned an Educational Domain Score that ranges from > 0.75 (More Positive Education Outcomes) to < 0.25 (Less Positive Education Outcomes). The City is divided into two separate scores, west of G Street falls under the 0.50 - 0.75 educational outcomes ranking and east of G Street falls under the > 0.75 educational outcomes ranking. This indicates a slightly more positive education outcome for the eastern section of the city.

Employment opportunities in rural areas are often limited, which draws people to urban hubs. The City of Blue Lake is located along U.S. Highway 299, which provides quick access to population centers to the west (McKinleyville and Arcata). The Jobs Proximity Index created by HUD displays the index scores for block groups in the 2014 to 2017 time period. Index scores are broken down from > 80 (Closest Proximity) to < 20 (Furthest Proximity). The entirety of the city falls within the 40-60 range. This score is standard when compared to much of its surrounding area, with an exception to the south west, which falls under the >80 proximity score (see **Figure 9**).

The City of Blue Lake is currently in the process of seeking public input on development opportunities within the Powers Creek District. The City is looking to revitalize this former industrial-business park with new mixed-use development, including commercial uses, housing, and recreational facilities.

When considering mobility opportunities for residents within the City of Blue Lake, most workers commute via a personal vehicle. According to the American Community Survey 2019 5-year estimates, Blue Lake had 490 workers 16 years and over in households. Zero percent of those households had no vehicles, 15 percent had one vehicle available, 51.6 percent had 2 vehicles, and 32.7 percent had three or more vehicles available. The mean travel time to work for residents was 16.2 minutes, and 85.3 percent of residents have an estimated travel time to work of less than 30 minutes. The American Community Survey Data is the only data available with these estimates, however it has flaws. For example, according to the American Community Survey 2019 5-year estimates, no one utilizes any form of public transit (bus), however, the Blue Lake Rancheria Tribe operates the Blue Lake Rancheria Transit System in the City. This transit system would not operate without use, and it is assumed that the ACS lacked sufficient data to determine an accurate percentage of public transit users.

Table 16 displays the number of people in Blue Lake with a disability and separates them based upon the disability they experience. According to the 2019 ACS data, it is estimated that out of 902 people in Blue Lake, 187 people or 20.7 percent of the City's population, requires special accommodations to live comfortably. The City of Blue Lake does not currently have a reasonable accommodation ordinance, because of this the City has created Implementation Program HI-1 which details that the City needs to develop and formalize this process. Given existing data limitations, there is not currently a way to determine the spatial patterns of disabilities within the community. It can be reasonably assumed that already limited housing options, and even fewer affordable housing options within the City, further limit opportunities for persons with a disability.

Access to a healthy environment is one of the markers of a higher quality of life. Utilizing the (R)TCAC Opportunity Areas (2021) environmental score mapping, census tracts are ranked between 0.75-1 (More Positive Environmental Outcomes) to <.25 (Less Positive Environmental Outcomes). As seen in **Figure 10**, the entire the city falls under the <.25 environmental domain score (EDS). It is likely that the methodology used in

the calculations of this metric are flawed. The methodology for this map relied upon a CalEnviroScreen 3.0 statewide risk assessment tool that takes measurements from limited sites in the state and them provides estimates for other areas. These inaccuracies are visible when viewing the state as a whole, for example, the majority of the Sierra Nevada Mountain range is also given the lowest EDS score. It should be noted that the EDS scoring metric does not appear to hold consistent with other resources publishing environmental information. For example, a CalEnviroScreen 4.0 tract overlay classifies the City as 31-40% with 1-10% being lowest (healthy) and 91-100% being highest (unhealthy). Much of the land in the State of California appears to shift dramatically between the two sources. The City of Blue Lake has not yet adopted an Environmental Justice Element to its General Plan that would aid in addressing disparities between portions of the City, however the entire City currently experiences the same EDS.

Locating patterns in access to opportunity within a community helps identify specific areas in need of additional investment or targeted polices. The City of Blue Lake is a small community with limited census data available, making pattern identification difficult. However, utilizing data from HCD and the AFFH data viewer, there does not currently appear to be patterns of segregation with regard to protected classes within the City.

Discussion of Disproportionate Housing Needs

Disproportionate Housing Needs generally refers to a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing need when compared to the proportion of members of any other relevant groups, or the total population experiencing that category of housing need in the applicable geographic area. Blue Lake looked at categories of housing needs including cost or severe cost burdens, overcrowding, substandard housing, homelessness, and at-risk housing converting to market-rate. Estimates for persons experiencing cost burdens is displayed in **Table 9**, estimates for persons experiencing overcrowding is displayed in **Table 7**, an estimate of housing needing rehabilitation is displayed in **Table 2**, homeless estimates are displayed on page 32. There are no subsidized housing projects within the City of Blue Lake. Analyzing this aggregate data by examining protected classes percentage composition is not possible given the available data at the time of this element's creation.

Figure 8 – TCAC Opportunity Areas (Education Score)

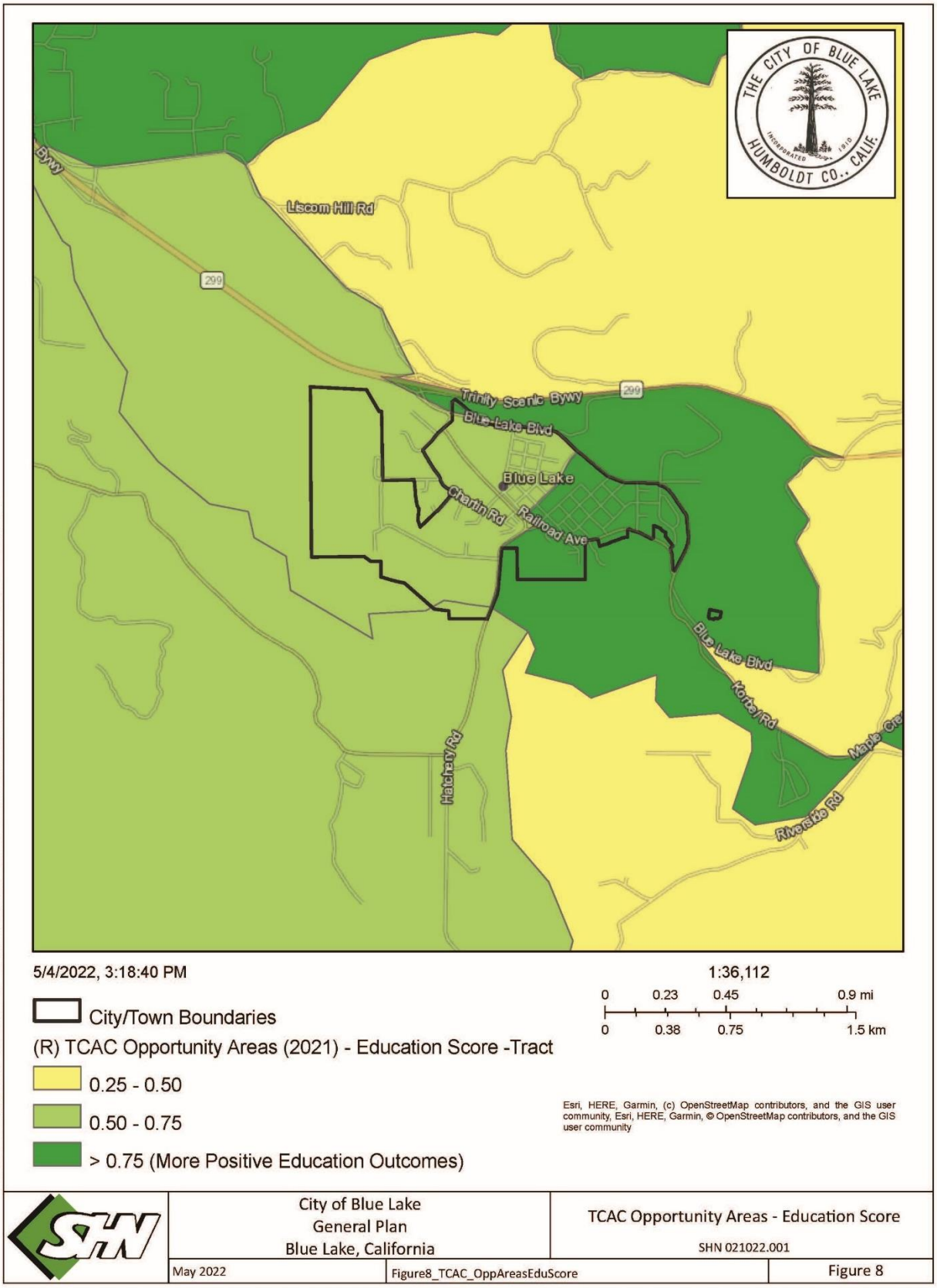
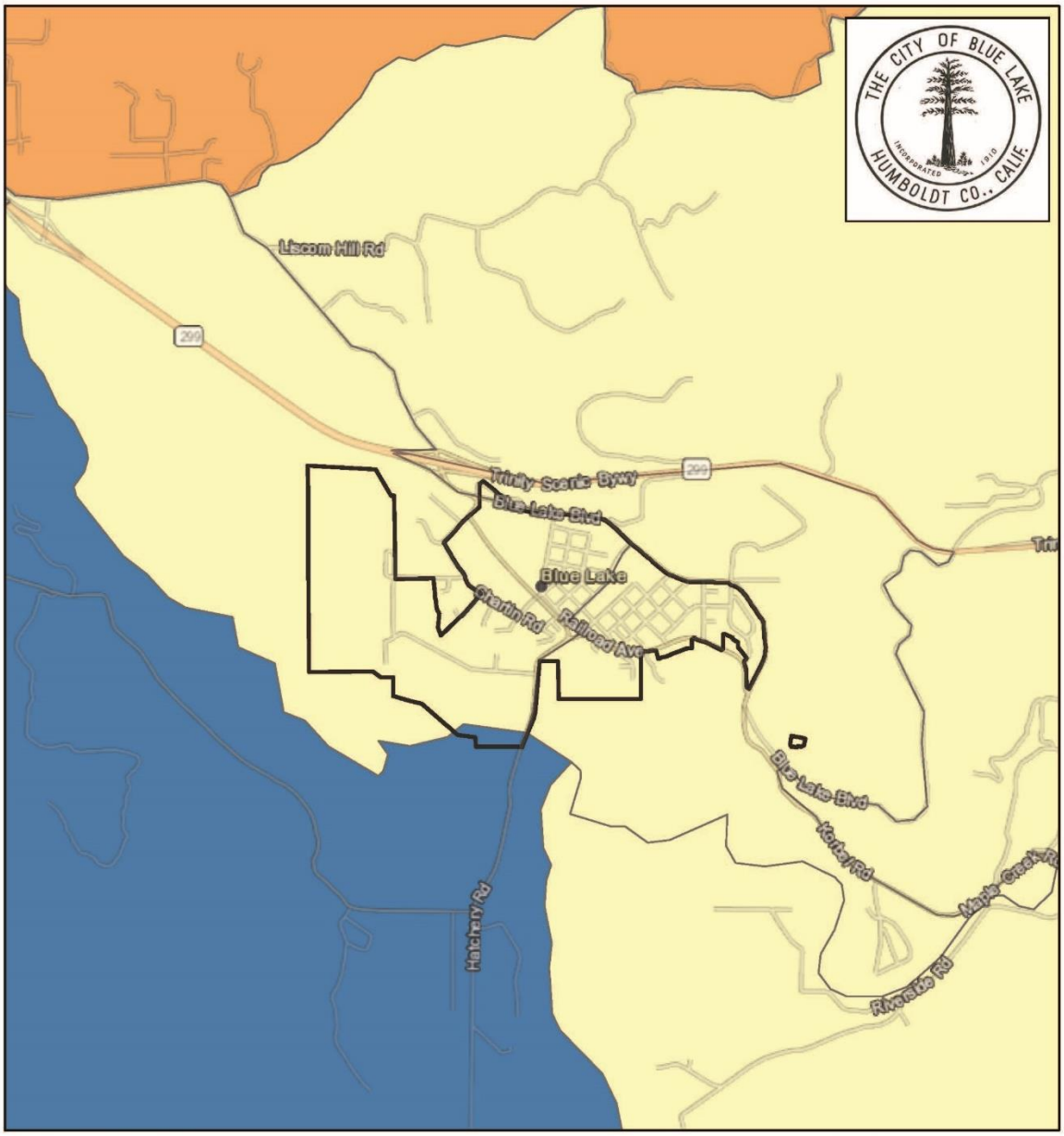


Figure 9 – Jobs Proximity Index



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0 0.23 0.45 0.9 mi

0 0.38 0.75 1.5 km

City/Town Boundaries

(A) Jobs Proximity Index (HUD, 2014 - 2017) - Block Group

20 - 40

40 - 60

> 80 (Closest Proximity)

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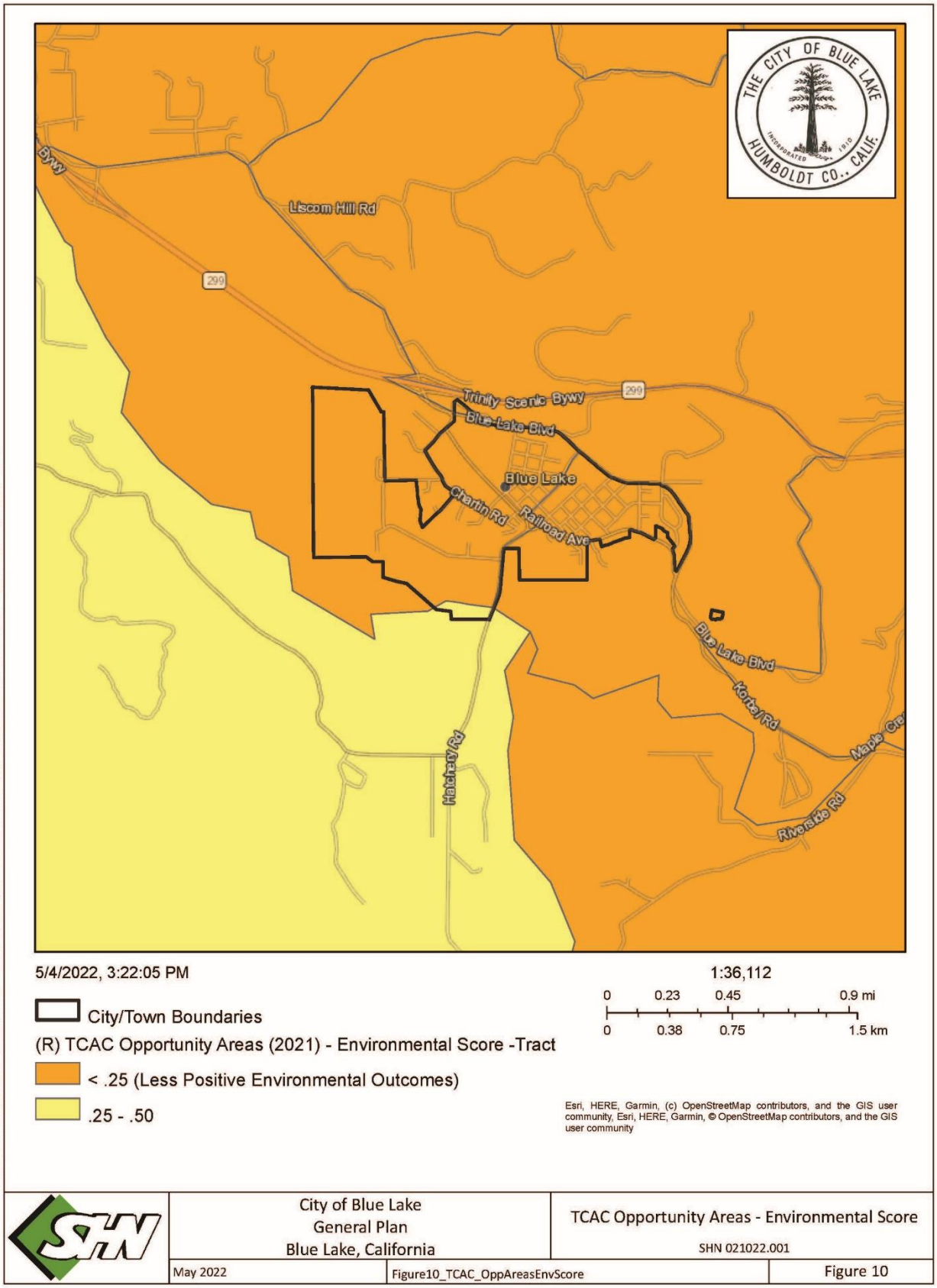
City of Blue Lake General Plan Blue Lake, California		Jobs Proximity SHN 021022.001
May 2022	Figure9_JobsProximity	Figure 9

Figure 10 – TCAC Opportunity Areas (Environmental Score)



Displacement Risk

Displacement risk can be fueled by a combination of different factors, including but not limited to: rising housing costs, income inequality, lack of employment opportunities, low wages, or inadequate market-rate housing production. The City currently has zero subsidized housing developments.

When looking at housing choice vouchers (HCV) as a percent of renter-occupied housing units, there is no data currently available for the City of Blue Lake, as seen in **Figure 11**. The City has considered the risk of displacement to protected classes, and currently views the risk of displacement as low. The City has a number of available avenues to further develop housing (vacant land, underdeveloped land, ADUs, etc.).

To date, the City has no evidence that new development (affordable or market-rate) has resulted in economic displacement. However, the City appreciates the possibility that economic displacement might occur in the future and has developed policy HI-13 that monitors the status of all affordable housing projects and, as their funding sources near expiration, will work with owners and other agencies to consider options to preserve such units. The City will also provide technical support to property owners and tenants regarding proper procedures related to noticing and options for preservation.

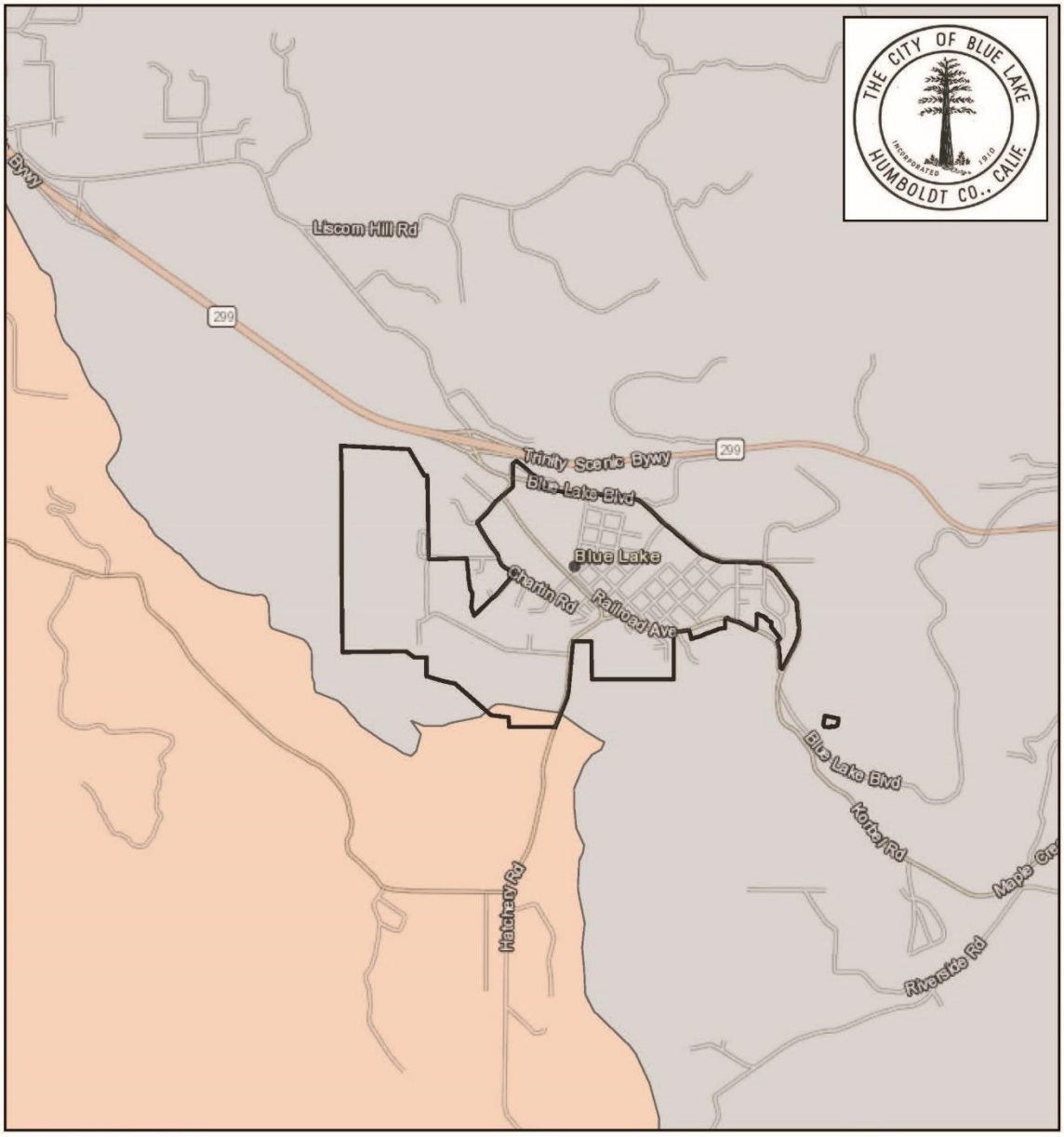
To the extent that future development occurs in areas where there is existing housing, all housing must be replaced according to SB 330's replacement housing provisions (Government Code Section 66300). SB 330 also provides relocation payments to existing low-income tenants. The State has also adopted just cause eviction provisions and statewide rent control to protect tenants from displacement.

Assessment of Contributing Factors to Fair Housing Issues

The City of Blue Lake, through internal analysis, has not identified any fair housing issues specific to the City. The public comments received thus far were primarily in regard to general concerns community members have about potential impacts of growth. Some community members also expressed concerns about potential social, economic, and environmental impacts of affordable high-density housing. Their concerns about affordable housing high-density housing included adequacy of infrastructure and utilities, adequacy of law enforcement and fire protection services, potential changes to the rural character of the community, and additional traffic, crime, noise, and lighting. The comments the City has received during development of the draft Housing Element Update do not present substantive arguments against the promotion of high-density affordable housing, and future comments will be addressed by city staff as part of the public participation process.

The City recognizes that the State of California, Humboldt County, and City of Blue Lake are all currently experiencing the need to develop affordable housing. A lack in housing opportunities (of any variety) can present a barrier to Affirmatively Furthering Fair Housing. The adoption of the 6th cycle Housing Element serves to improve the avenues through which housing development can occur within the City of Blue Lake and Affirmatively Further Fair Housing.

Figure 11 – Housing Choice Vouchers



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1:36,112

0 0.23 0.45 0.9 mi

0 0.38 0.75 1.5 km

City/Town Boundaries

(R) Housing Choice Vouchers - Tract

No Data

> 0 – 5%

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City of Blue Lake General Plan Blue Lake, California		Housing Choice Vouchers SHN 021022.001
May 2022	Figure11_HousingChoiceVouchers	Figure 11

Analysis of Sites Pursuant to AB 686

AB 686 requires that jurisdictions identify sites throughout the community in a manner that is consistent with its duty to affirmatively further fair housing. The site identification requirement involves not only an analysis of site capacity to accommodate the RHNA, but also whether the identified sites serve the purpose of improving segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity.

Table 21 identifies the City's inventory of vacant sites with a series of descriptors attached to them. In reviewing the AFFH Data and Mapping Resources tool provided by HCD, the predominant race/ethnicity in Blue Lake's Census tract is White (Predominant gap >50%) and the City's diversity index is mostly in the 40-55 and below range (see Figure 12), which is on the side of lower diversity. It is noted that no area of the City was identified as having a different predominant population. The City is only composed of two different income brackets as seen in Figure 6. Additionally, the City does not have any racially or ethnically concentrated areas of poverty and the identification of sites to accommodate the City's RHNA is not expected to alter this finding. The City does not currently have qualifying affordable housing developments. The City will consider any new housing development project impacts on the distribution of different populations (income level, race, etc.) within the City.

Figure 1 and Figure 2 show the proposed candidate sites to meet the RHNA for Blue Lake. The City of Blue Lake is home to a low concentration of persons with disabilities (10%-20% of the population with a disability), and persons with disabilities are represented in Blue Lake with no discernible patterns of segregation towards individuals with disabilities. Additionally, according to ACS 2015-2019 data, the City of Blue Lake and its surrounding region fall under the lowest category for percent of children in a female-headed household with no spouse or partner present (<20%). Further, Table 15 identifies the City's population of older residents, specifically persons 65 years of age or older; there is currently no discernible pattern of segregation, although data is limited for the City.

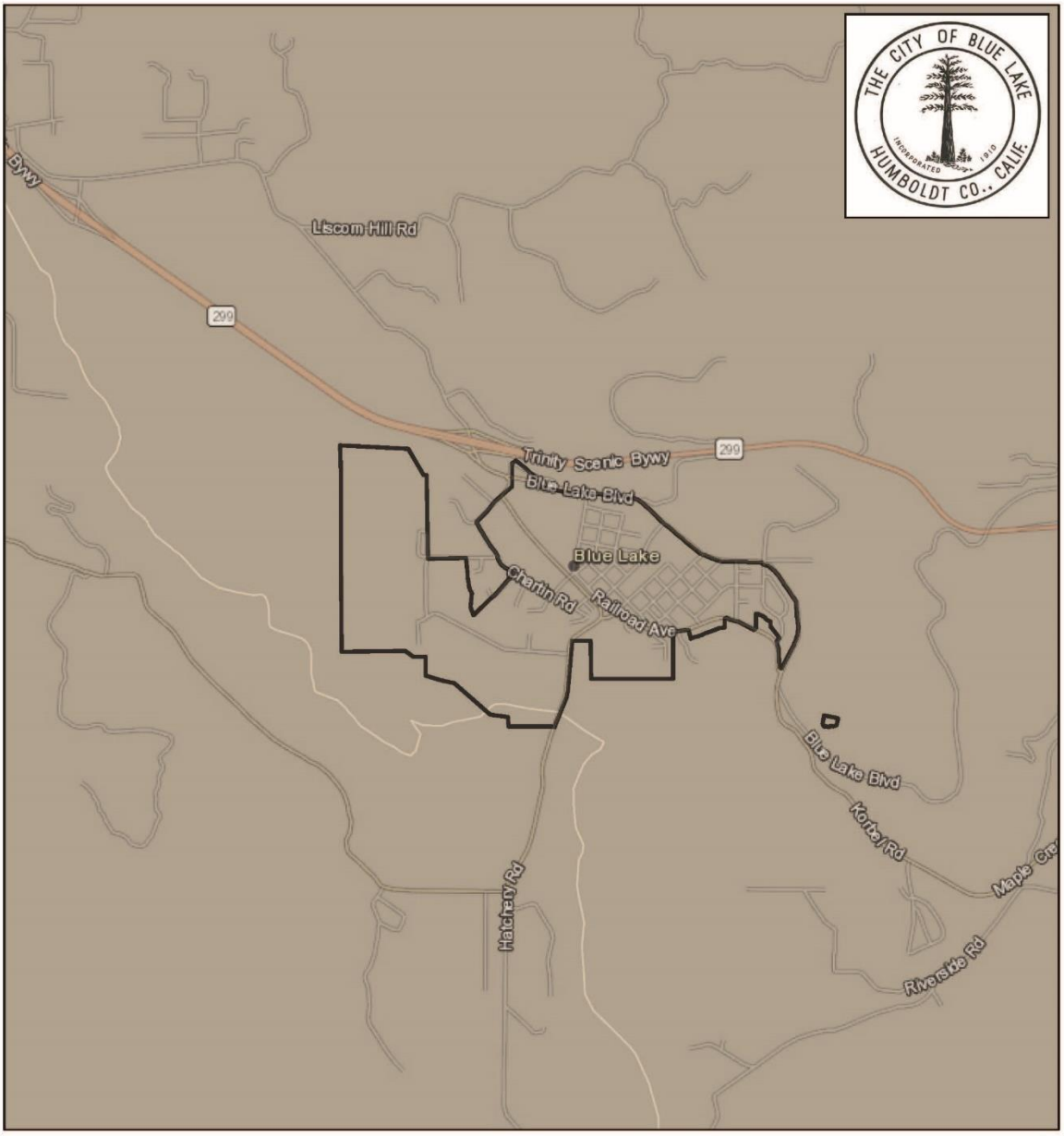
Additionally, existing affordable units, as well as moderate and above moderate income candidate sites, appear to have pretty similar access to opportunities for all residents. The TCAC/HCD Opportunity Area Maps showing slight differences in resource levels based on a resident's location in the city. Sites identified for residential development in this Housing Element were compared against the TCAC/HCD Opportunity Area Maps to determine if there is a correlation between where existing and proposed affordable housing developments are located and lower levels of opportunity. It does not appear that there is a correlation between lower levels of opportunity or resources for existing/proposed affordable housing developments for lower income households and higher levels of opportunity or resources for moderate and above moderate households.

The City has identified a number of vacant parcels that it views as good candidates for affordable housing development. These sites can be viewed in Table 21 and Figure 1. Several of the proposed sites for affordable housing are located in the former industrial area of the City, which is now referred to as the Powers Creek District. This area of the City has historically contained heavy industrial uses including a carbon reprocessing plant, biomass plant, and an in-stream gravel extraction operation. Due to unfavorable market conditions, the carbon reprocessing plant and biomass plant have been shut down for several years, and it is anticipated that these sites will be redeveloped with non-industrial uses in the future. The gravel operation has limited potential to impact future residential development in this area, since it only involves the extraction of gravel during a short window each summer, requires intermittent hauling of gravel to construction sites, is separated from other properties in the District by a vegetative buffer, and is over 500 feet from the vacant parcels zoned for mixed-use development. The other uses in the District primarily include light manufacturing or commercial uses that produce various products within buildings, which significantly minimizes potential impacts of these activities.

In 2021, the City completed a 4-year planning process to rebrand and rezone the Powers Creek District to allow a mixture of commercial, light manufacturing, and residential uses. The name of the District was inspired by the creek that runs along the northern boundary of the District and the parcels rezoned for mixed-use development. The vacant parcels in the District that could be developed with residential uses are superior to other sites in the City since they are larger properties, have better access, and have limited environmental constraints. In addition, the District has a heavily used trail system that provides pedestrian and bicycle access to the City's Downtown, recreational facilities, and the Mad River.

Locating affordable housing in active industrial areas is a potential environmental justice issue that the City has taken into consideration as part of the planning effort to revitalize the Powers Creek District. Since the heavy industrial uses in the District have been non-operational for several years, the City is proposing to redevelop this area into a vibrant mixed-use district that includes residential uses above commercial or light manufacturing spaces and a variety of recreational facilities for use by the community and visitors to the area. Because of past industrial use of the District, the City has completed Phase I and Phase II Environmental Site Assessments of the vacant parcels in the District, which have concluded that there are minor areas of petroleum hydrocarbon contamination that can be remediated during future development activities (e.g., excavation and offsite disposal of contaminated soils). While the former heavy industrial sites are being redeveloped, the primary impact to future residents in the District would be aesthetic impacts from existing industrial buildings and short-term construction impacts. Due to the separation of the gravel operation from the areas zoned for mixed-use development, potential impacts to future residents would be limited to intermittent truck traffic from hauling gravel to construction sites. This potential impact is similar to what is experienced by existing residential development along the City's industrial truck route, which runs through the center of town. Based on the existing land uses in the Powers Creek District and the proposal to redevelop this area for mixed-uses, the development of affordable housing in the District is not anticipated to result in environment justice issues for the future residents.

Figure 12 – Predominant Population (White Majority Tracts)



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0 0.23 0.45 0.9 mi

0 0.38 0.75 1.5 km

City/Town Boundaries

(R) Predominant Population - White Majority Tracts

Predominant (gap > 50%)

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City of Blue Lake General Plan Blue Lake, California		Predominant Population SHN 021022.001
May 2022	Figure12_PredominantPopulation	Figure 12

Findings and Programs Affirmatively Furthering Fair Housing

The findings resultant from the Affirmatively Furthering Fair Housing process do not indicate that the City of Blue Lake currently has discernable patterns of segregation, access to opportunity, displacement, or related issues. Although the City does not currently have identified issues that conflict with the City's goal to affirmatively further fair housing, there are actions that can be taken to improve, establish, or amend current city processes and policies to further support Affirmatively Furthering Fair Housing.

A number of new programs have been added to this housing element that support the City's goal to Affirmatively Further Fair Housing and assist protected groups in achieving a higher quality of life. A summary of relevant programs is included below:

- HI-1: Amend Zoning Ordinance to address the following: Accessory Dwelling Units, Manufactured housing/ Mobile homes, Single Room Occupancy Units, Transitional and Supportive Housing, Emergency Shelters, Employee Housing, Density Bonus, Reasonable Accommodation, and Residential Care Facilities.
- HI-2: Allowing for low barrier navigation centers for the homeless.
- HI-3: Publicize available programs in community newsletter, and water billing.
- HI-4: Pursue grants that assist first time homebuyers, rehabilitation, manufactured housing, and technical assistance.
- HI-5: Conduct outreach to nonprofits and developers to identify ways to assist in affordable housing development.
- HI-6: Encourage new and rehabilitation units to include weatherization improvements through publicization and informational programs.
- HI-9: Survey the current housing stock so the city can coordinate with the County on directing housing rehabilitation funding to targeted income groups in the City.
- HI-10: Develop a plan to Affirmatively Further Fair Housing and take a proactive approach to ensure that disparities in housing needs and access are addressed for all city residents.
- HI-12: Work with Redwood Coast Regional Center on outreach to residents needing services for persons with developmental disabilities.
- HI-13: Monitor affordable housing projects to ensure housing within the city remains affordable.

Constraints on the Development of Housing

Various interrelated factors can constrain the ability of the private and public sectors to provide adequate housing and meet the housing needs for all economic segments of the community. These factors can be divided into two categories: (1) governmental constraints and (2) nongovernmental constraints. Governmental constraints consist of land use controls, development standards, processing fees, development impact fees, code enforcement, site improvement costs, development permit and approval processing, and provision for a variety of housing. Nongovernmental constraints consist of land availability, the environment, vacancy rates, land cost, construction costs, and availability of financing.

Governmental Constraints

Governmental constraints refer to the policies and regulations that a local government applies to the approval of land use proposals. While local government can have little impact on market-oriented constraints, such as interest rates, their policies and regulations do impose costs upon development. While these measures are often necessary to protect the public health, safety, or welfare of the community, the effect of any particular requirement must be weighed carefully to ensure that it does not unduly burden the ability of the market to provide for the housing needs of the community. Governmental constraints may include land availability, local land use regulations, development standards and building code compliance, permit processing times and procedures, and permit and connection fees.

Pursuant to Government Code Section 65940.1(a)(1), all documents and standards discussed below are required to be available to the public on the City of Blue Lake website (https://bluelake.ca.gov/). Currently, the Municipal Code, including the subdivision code (Title 16) and Zoning Code (Title 17), is available on the City's website at the following address: https://bluelake.ca.gov/city-council/ordinances-municipal-code/. Some of the documents listed in Government Code Section 65940.1(a)(1) are not currently available on the City's website. To ensure compliance with Government Code Section 65940.1(a)(1), Program HI-20 has been included in this element which commits the City to uploading all required documents to its website within one year of adoption of this element.

Zoning Standards

The City of Blue Lake exercises discretionary authority over the residential development entitlement process through the implementation of the zoning (Title 17) and subdivision (Title 16) sections of its Municipal Code. These ordinances establish development standards to regulate all residential construction consistent with the General Plan. Development standards refer to those requirements, such as maximum building height, setbacks, maximum ground coverage, minimum lot size, etc., that must be followed when placing structures on real property. The subdivision regulations similarly control the creation of new lots for development and regulate such matters as the layout of streets and lots, utility extensions, grading, and drainage improvements. Table 24 provides a summary of the City's development standards in zones that permit residential uses.

As indicated in Table 24, the R-3, MU, and O zones in the City of Blue Lake have the least restrictive development standards and allow up to four residential units by right (principally permitted). A use permit is required in these zones for five or more units. The maximum density in these zones ranges from 1 unit per 2,000 s.f. (R-3) to 1 unit per 2,500 s.f. However, in the O zone, 1-bedroom units are allowed at a density of 1 unit per 1,250 s.f. In addition, the PDR zone allows multi-family residential development with a use permit at a density of 1 unit per 6,000 s.f., or as modified by the Special Density (D) combining zone. The maximum density when applying the D combining zone is 1 unit per 3,000 s.f. As indicated in Table 21 and Table 22, the larger sites (>1 acre) in the PDR,

MU, and O zones are the primary sites that could accommodate higher density multi-family units and improvements.

To ensure that the use permit process for multi-family projects does not inhibit multi-family development, the City will adopt and apply a Combining Zone to sites greater than 1-acre in the R-3, MU, O, or PDR zones to allow multi-family residential uses by-right. The City will also review development standards including, but not limited to, height, lot coverage and density, to ensure they do not constrain the development of housing (see Program HI-14).

Table 24 – Development Standards from the City of Blue Lake Zoning Code

Zoning Classification	Use Permit	Minimum Lot Area	Maximum Lot Coverage	Density Un/s.f.	Setbacks F-R-S	Maximum Height
R-1		6,000 s.f.	40%	1/6,000	15-20(max)-4	35 feet
Single-Family	No					
Two-Family	Yes					
R-2		6,000 s.f.	60%	1/2,500	20-15(max)-4	35 feet
Single-Family	No					
Two-Family	No					
R-3		6,000 s.f.	60%	1/2,000	15-10-5	45 feet
Single-Family	No					
Two-unit	No					
Multi-unit (≤4)	No					
Multi-unit (5+)	Yes					
PDR		6,000 s.f.	40%	1/6,000[1]		
Single-Family	No				15-20(max)-4	35 feet
Multi-unit (≤4)	Yes				25-25-10	30 feet
Multi-unit (5+)	Yes				25-25-10	30 feet
MU		6,000 s.f.	60%	1/2,500	15-20(max)-4	35 feet
Single-Family	No					
Multi-Unit (≤4)	No					
Multi-Unit (5+)	Yes					

Zoning Classification	Use Permit	Minimum Lot Area	Maximum Lot Coverage	Density Un/s.f.	Setbacks F-R-S	Maximum Height
O		15,000 s.f.	70%	1/2,500[2]	Variable[3]	35-45 feet
Single-Family	No					
Multi-Unit (≤4)	No					
Multi-Unit (5+)	Yes					

[1]Unless modified by D combining zone
[2]One-bedroom units are allowed at a density of 1 unit per 1,250 s.f.
[3]Setbacks are required from Powers Creek, the creek trail, the public rights-of-way, and the Blue Lake Rancheria.

The City adopted these development standards to ensure that minimum levels of design and construction quality are maintained, and adequate levels of street and infrastructure/utility improvements are provided. While these standards generally apply to all developments, there is an opportunity to modify the standards to address site-specific design constraints associated with topography or sensitive resource areas. Modification of the development standards could occur through application of the Planned Development (P-D) combining zone, application of the Special Density (D) combining zone, or by requesting exceptions as part of the use permit process as allowed in the MU and O zones. Additionally, qualifying housing projects (i.e., those including a specified number of units affordable to lower-income households and/or seniors) can seek further flexibility through incentives/concessions as allowed under the State density bonus law. The City's Zoning Code also allows for variances to the development standards where either of the below findings can be made:

- That any variance granted shall be subject to such conditions as will assure that the adjustment thereby authorized shall not constitute a grant of special privilege, inconsistent with the limitations upon other properties in the vicinity, and zone in which the subject property is situated, and that because of special circumstance applicable to subject property, including size, shape, topography, location or surroundings, the strict application of the zoning regulations is found to deprive the subject property of privileges enjoyed by other properties in the vicinity and under identical zone classification; or
- That any variance granted will not be contrary to the intent of the zoning regulations or to the public interest, safety, welfare, and, where due to special conditions or exceptional characteristics of such property, or its location or surroundings, a literal enforcement of the zoning regulations would result in practical difficulties or unnecessary hardships.

The zoning requirements and development standards that have the potential to be a constraint to the various housing types are discussed further under the section entitled "Provisions for a Variety of Housing." It is acknowledged that the City's current development standards have the potential to result in a decreased supply of housing and an increased cost per residential unit. Where appropriate, programs are proposed to remove potential constraints to the development of housing, which are intended to result in an increased supply and reduced cost for housing in the City.

Typical Densities for Development

As indicated in Table 24 above, the maximum residential density in the City ranges from 1 unit per 2,000 s.f. (21.78 units per acre) to 1 unit per 6,000 s.f. (7.26 units per acre). Additionally, in the O zone, 1-bedroom units are allowed at a density of 1 unit per 1,250 s.f. (38.84 units per acre) to incentivize smaller units that would be more affordable.

Parking Standards

The City's parking requirements vary according to the type of dwelling unit, as shown in Table 25. To ensure that off-street parking requirements do not inhibit the development of housing in the City, Municipal Code Section 17.24.100.B.4 allows the City Planner to waive off-street parking spaces otherwise required if certain criteria can be met. The criteria for parking waivers include the historical nature of the property, the architectural or landscaping amenities that would be displaced by parking, the availability of space on a parcel with existing improvements, the proximity to a bus stop or alternative transportation facilities, the provision of bicycle parking spaces, or the provision of pervious parking spaces. Most projects in the City can meet one or more of the above criteria to receive a parking waiver. Since the City provides an administrative approval process for parking waivers, off-street parking requirements are not considered a constraint to residential development.

Table 25: Residential Parking Standards

Type of Use	# of Spaces Required
Residential; including single-family, two-family, second units, and apartments	1 for each dwelling unit containing 1 or fewer bedrooms 2 for each dwelling unit containing more than 1 bedroom
Trailer Parks	1 for each trailer unit plus 1 additional space for each 4 units
Institutional, Educational, Civic; including rest homes, nursing homes, etc.	1 for every 2.5 beds

Provisions for a Variety of Housing

Housing element law specifies that jurisdictions must identify adequate sites to be made available through appropriate zoning and development standards to encourage the development of various types of housing for all economic segments of the population. This includes single-family housing, multi-family housing, manufactured housing, mobile homes, farmworker housing, emergency shelters, transitional and supportive housing, housing for persons with disabilities, and accessory dwelling units. Each of these housing types is described below including how it is defined and any programs proposed to comply with State housing law or remove potential constraints to the development of housing. Table 26 summarizes the permitted housing types in the zones allowing residential development.

Table 26: Housing Types Permitted by Zoning District

Housing Types Permitted	R1	R2	R3	PDR	MU	O	HC, RC, SC	AE
Single Family Dwelling	P	P	P	P	P	P	CUP[1]	P[4]
Two-Family Dwellings	CUP	P	P	CUP	P	P	CUP[2]	--
Three-Family Dwellings	--	--	P	CUP	P	P	CUP[2]	--
Four-Family Dwellings	--	--	P	CUP	P	P	CUP[3]	--
Multi-family (5+ Units)	--	--	CUP	CUP	CUP	CUP	CUP[3]	--
Rooming and Boarding Houses	--	CUP	CUP	CUP	CUP	--	CUP[3]	--
Rest Homes	CUP	--	--	CUP	--		--	--
Mobile Homes Parks	--	--	CUP	CUP	--	--	--	--

Housing Types Permitted	R1	R2	R3	PDR	MU	O	HC, RC, SC	AE
Manufactured Homes (Single)[5]	P	P	P	P	P	P	P	P
Accessory Dwelling Unit[6]	P	P	P	P	P	P	P	P

P – Principally Permitted
CUP – Conditional Use Permit
-- Use Not Allowed
[1]Secondary to a commercial use in RC and SC zones.
[2] Secondary to a commercial use in the RC zone. Not allowable in the SC zone.
[3]Only allowable in the HC zone.
[4]One (1) dwelling unit per ten (10) acres.
[5]State law allows manufactured homes in any zone that allows a conventional ("stick-built") home.
[6]State law allows accessory dwelling units in any zone that allows a single-family residence.

Single-Family Housing

The City defines single-family dwellings (referred to as "Dwelling, One-Family" in the definitions section of the Zoning Code) as a detached building designed and/or occupied exclusively by one family. As indicated in Table 26, single-family housing is principally permitted in all residential and mixed-use zones, but requires a use permit in HC, RC, and SC zones. Any single-family dwelling constructed or placed in the City (including a manufactured home) must comply with the development standards in Section 17.24.260 of the Zoning Code, which provides standards for building width, roof pitch, roof overhang length, exterior siding materials, and roof materials.

The City's current definition includes stick-built homes but does not specifically include factory-built, modular housing units that are constructed in compliance with the California Building Code (CBC) or mobile homes/manufactured housing units that comply with the National Manufacturing Housing Construction and Safety Act of 1974 that are placed on permanent foundation systems. In addition, the City's definition does not include transitional and supportive housing serving six or fewer persons. Because the City's current definition is not consistent with State housing law, the City defers to State law when reviewing these types of units. Due to this inconsistency with State law, Program HI-1 has been included in this element which commits the City to the following: 1) amend the Zoning Code to allow manufactured housing and mobile homes in the same manner and in the same zone as conventional or stick-built structures are permitted (Government Code Section 65852.3); and 2) amend the Zoning Code to define transitional and supportive housing and permit this type of housing as permitted uses subject to only the same restrictions on residential uses contained in the same type of structure.

Multi-Family Housing

The City defines multi-family dwellings (referred to as "Dwelling, Multiple" in the definitions section of the Zoning Code) as a building or portion thereof used and/or designed as a residence for four or more families living independently of each other, and doing their own cooking in the building, including apartment houses, apartment hotels and townhouses, but not including automobile courts. As indicated in Table 26, four-family dwellings are principally permitted in the R-3, MU, and O zones, and require a use permit in the PDR, HC, RC, and SC zones. Multi-family housing (5+ units) requires a use permit in all zones that allow five or more residential units (i.e., R-3, PDR, MU, O, and HC zones). To ensure that the use permit process for multi-family projects does not inhibit multi-family development and the ability of the City to accommodate its share of the regional housing need, Program HI-14 has been included in this element which commits the City to adopting and applying a Combining Zone to sites greater than 1-acre in the R-3, MU, O, or PDR zones to allow multi-family residential uses by-right.

The City's Zoning Code contains separate definitions for duplexes and triplexes, which are referred to as "Dwelling, Two-Family" and "Dwelling Three-Family," respectively. The City's current definition of multi-family housing does not specifically include transitional and supportive housing or single-room occupancy housing. Due to this inconsistency with State law, Program HI-1 has been included in this element which commits the City to

the following: 1) amend the Zoning Code to define transitional and supportive housing and permit this type of housing as permitted uses subject to only the same restrictions on residential uses contained in the same type of structure; and 2) amend the Zoning Code to define and allow SRO units as a principally permitted use in the Residential Multiple-Family (R-3), Mixed-Use (MU), Opportunity (O), and Planned Development Residential (PDR) zones.

As indicated in **Table 24**, the PDR zone allows multi-family housing with a use permit. However, some of the development standards in the zone are the same as those required in the R-1 zone or are less permissive for multi-family housing. For example, the maximum ground coverage requirement in the PDR zone is 40 percent, which is more appropriate for single-family housing and is a potential constraint to the development of multi-family housing. Most of the zones allowing multi-family housing have a maximum ground coverage standard of at least 60 percent (e.g., R-2, R-3, and MU zones). The PDR zone also has separate development standards for single-family structures and "all other structures." Multi-family housing would fall under the "all other structures" category and is subject to a less permissive maximum building height (i.e., 30 feet instead of 35 feet) and less permissive setbacks (i.e., F-25 feet/ R-25 feet/S-10 feet instead of F-15 feet/R-20 percent of lot depth to a maximum of 20 feet/S-4 feet). To remove these potential constraints, Program HI-19 has been included in this element which commits the City to the following: 1) amending the PDR zone to allow a maximum ground coverage that is similar to the other zones that allow multi-family housing (e.g., 60 percent); 2) amending the PDR zone to allow a more permissive maximum building height such as the standard allowed for single-family structures (i.e., 35 feet); and 3) amending the PDR zone to allow more permissive setbacks for multi-family housing such as those allowed in other zones permitting multi-family housing (e.g., F-15 feet/R-20 percent of lot depth to a maximum of 20 feet/S-5 feet).

Two zones in the City that allow multi-family housing have a development standard that places a limitation on the number of stories a building may have in addition to the maximum building height in feet. The R-2 and MU zones have a maximum building height standard that states, "*35 feet, or not exceeding two stories*." Although this standard could be open to interpretation as to whether it limits a structure to 35 feet or two stories, the intent of the standard was to limit the number of building stories to two. Thirty-five (35) feet is a height limit that would allow the development of three-story residential buildings, which can range in height from 30-40 feet depending on the design. As such, the limitation on the number of stories in the R-2 and MU zones would typically be the limiting factor for building height and is a potential constraint to the development of multi-family housing. For comparison, most of the zones allowing residential development in the City (e.g., R-1, R-3, PDR, and O) do not contain a limitation on the number of stories. To remove this potential constraint, Program HI-19 has been included in this element which commits the City to amending the R-2 and MU zones to remove the limitation on the number of stories in the maximum building height standard.

Manufactured Housing

The City's definition of manufactured housing is the same as defined in Section 18007 of the Health and Safety Code. Section 17.24.091 of the City's Zoning Code contains standards for manufactured homes that restricts the placement of these types of units to the Planned Development Residential (PD-R) zone. This requirement of the Zoning Code is inconsistent with State law because manufactured homes must be allowed in the same zones as stick-built residential structures (Government Code Section 65852.3). Section 17.24.091 also contains the following eligibility requirements for manufactured homes to ensure they are permitted on compatible lots:

- The manufactured home must be certified under the National Manufactured Housing Construction and Safety Standards Act of 1974.
- The manufactured home shall have been constructed and certified not more than 10 years before date of application for the required installation permit or permits.
- The manufactured home must be installed on a permanent foundation system being designed in accordance with the provisions of Section 18551 of the Health and Safety Code and the City's current building standards and practices.

- The manufactured home shall be subject to all development standards to which a conventional single-family residence on the same parcel would be subject (see Section 17.24.260).
- The manufactured home must be owned by the property owner of record.
- The manufactured home may be precluded in an area or proposed to be listed on the National Registry of Historic Places consistent with Government Code Section 65851.3(b).

Because the City's current code requirements for manufactured housing are not consistent with State housing law, the City defers to State law when reviewing these types of units. Due to this inconsistency with State law, Program HI-1 has been included in this element which commits the City to amending the Zoning Code to allow manufactured housing in the same manner and in the same zones as conventional or stick-built structures are permitted.

Mobile Homes

The City's definition of mobile homes is the same as defined in Section 18008 of the Health and Safety Code. There is currently one privately-owned mobile home park in the City, with a total of 41 occupied mobile home spaces. As indicated in **Table 26**, mobile home parks are allowed with a use permit in the R-3 and PDR zones. Similar to manufactured homes, a mobile home that is proposed to be located on an individual lot is subject to the requirements of Section 17.24.091 of the Zoning Code. As noted above, Section 17.24.090 contains standards that restrict the placement of individual mobile home units to the Planned Development Residential (PD-R) zone. This requirement of the Zoning Code is inconsistent with State law because mobile homes must be allowed in the same zones as stick-built residential structures (Government Code Section 65852.3). Because the City's current code requirements for individual mobile homes are not consistent with State housing law, the City defers to State law when reviewing these types of units. Due to this inconsistency with State law, Program HI-1 has been included in this element which commits the City to amending the Zoning Code to allow mobile homes in the same manner and in the same zones as conventional or stick-built structures are permitted.

Farmworker Housing

California law (Government Code Section 65583(c)(1)(C)) requires the adequate provision of sites to accommodate the housing needs of farmworkers. Housing elements should ensure that local zoning, development standards, and permitting processes comply with the Employee Housing Act Sections 17021.5 and 17021.6. Section 17021.5 generally requires employee housing for six or fewer persons to be treated as a single-family structure and residential use. A jurisdiction cannot require any minor use permit, zoning variance, or other zoning clearance for this type of employee housing that is not required of a single-family dwelling of the same type in the same zone. Section 17021.6 generally requires employee housing consisting of not more than 36 beds in group quarters or 12 units or less designed for use by a single family or household to be treated as an agricultural use in agricultural zoning districts. A jurisdiction cannot require a minor use permit, zoning variance, or other zoning clearance for this type of employee housing that is not required of any other agricultural activity in the same zone.

The City's Zoning Code allows housing for farm employees in the Agriculture Exclusive (AE) zone. The AE zone allows a maximum of one dwelling unit per 10 acres by-right and one additional dwelling unit for each additional 10 acres (also by-right). The AE zone also specifies that such dwelling units shall be occupied by the farm and farm employees only (see Zoning Code Section 17.16.020(A)(1)). Additionally, the City's Zoning Code defines a "Farm Dwelling" as a dwelling on farm premises for permanent residents of the farm, such as the owner, lessee, foreman or other whose principal employment is the operation of the farm, as distinguished from quarters for seasonal labor. Currently, there is only one property in the City that is zoned AE (APN 025-091-021), which is an approximately 4.5-acre parcel on the southern boundary of the City that has historically been used for crop production and grazing. This property is not included in the sites inventory in this element as a site needed to accommodate the City's share of the regional housing need.

As discuss above, California Health and Safety Code Sections 17021.5 and 17021.6 generally require agricultural employee housing to be permitted by-right, without a discretionary permit (e.g., Conditional Use Permit, Site Plan Approval, etc.), in single-family zones for six or fewer persons and in agricultural zones with

no more than 12 units or 36 beds. Additionally, Section 17021.6 requires that the permitted occupancy in employee housing in a zone allowing agricultural uses shall include agricultural employees who do not work on the property where the employee housing is located. To ensure the City's Municipal Code is compliant with these sections of the Health and Safety Code, Program HI-1 has been included in this element which commits the City to making the following code amendments: 1) amendment of the Zoning Code to allow agricultural employee housing for six or fewer persons by-right in the Residential One-Family (R-1) zoning district, subject to the same regulations as a single-family dwelling; 2) amendment of the Zoning Code to allow agriculture employee housing of no more than 12 units or 36 beds as a by-right agricultural use in the Agricultural Exclusive (AE) zoning district; and 3) amendment of the definition of "Farm Dwelling" in the Zoning Code to be consistent with Health and Safety Code Section 17026.1.

Emergency Shelters

The California Health and Safety Code (Section 50801) defines an emergency shelter as "housing with minimal supportive services for homeless persons that is limited to occupancy of six months or less by a homeless person. No individual or households may be denied emergency shelter because of an inability to pay."

Senate Bill 2 requires jurisdictions to allow emergency shelters and transitional housing without a conditional use permit or other discretionary permit (e.g., Site Plan Approval, Design Review, etc.). The City must identify a zone or zones where emergency shelters will be allowed as a permitted use without a conditional use permit or other discretionary permit. The zone or zones identified must have land available to accommodate an emergency shelter.

The City of Blue Lake's Municipal Code does not have any provisions identifying or allowing emergency shelters within the city. The City has included Implementation Program HI-1 to comply with State Law and is proposing a zoning amendment before adoption of the Housing Element update. As indicated in the time frame for HI-1, this amendment will be adopted by the City Council prior to the adoption of the Housing Element for the 6th cycle planning period. This amendment was adopted by the City Council in December 2022 and took effect in January 2023 (see Municipal Code Section 17.16.111(B)(8)).

While it is unlikely due to the limited services that an emergency shelter would be developed in the City of Blue Lake, the Opportunity (O) zone has been identified as appropriate to accommodate an emergency shelter, should one be needed. The City assumes the emergency shelter would be best suited as a new development in the Powers Creek District due to the limited vacant land in the Downtown area or space available in existing vacant buildings. The Powers Creek District contains several acres of vacant or underutilized land that is zoned O and could be developed with an emergency shelter. Although there are limited services in the City, the Powers Creek District and O zone are within walking distance of the Downtown and the Blue Lake Community Resource Center. In addition to amending the O zone to allow emergency shelters as a principally permitted use, the City is also proposing to include objective standards as allowed by Government Code Section 65583(a)(4)(A). The objective standards include: 1) The shelters shall have onsite management and security shall be provided during hours when the shelter is open; 2) Each shelter shall be limited to a maximum of 15 beds; and 3) There shall be a separation of 300 feet between emergency shelters.

Transitional and Supportive Housing

SB 2 requires that transitional and supportive housing types be treated as residential uses and subject to only those restrictions that apply to other residential uses of the same type in the same zone.

Transitional housing is defined in Section 50675.2 of the Health and Safety Code as rental housing for stays of at least six months but where the units are recirculated to another program recipient after a set period. It may be designated for a homeless individual or family transitioning to permanent housing. This housing can take many structural forms such as group housing and multi-family units and may include supportive services to allow individuals to gain necessary skills in support of independent living.

Supportive housing is defined by Section 50675.14 of the Health and Safety Code as housing with linked on-site or off-site services, with no limit on the length of stay, and occupied by a target population as defined in Health and Safety Code Section 53260 (i.e., low-income person with mental disabilities, AIDS, substance abuse or chronic health conditions, or persons whose disabilities originated before the age of 18). Service linked to supportive housing are usually focused on retaining housing, living and working in the community, and/or health improvement.

Both transitional and supportive housing types must be permitted explicitly in the City's Zoning Code. There are not currently specific definitions for these housing types in the City's Zoning Code and they are not included under the definitions for single-family housing and multi-family housing. Because the City's Zoning Code does not specifically address these housing types, the City defers to the requirements of State law when reviewing these types of units. To address this inconsistency with State law, Program HI-1 has been included in this element which commits the City to amending the Zoning Code to permit transitional and supportive housing as permitted uses subject to only the same restrictions on residential uses contained in the same type of structure.

Housing for Persons with Disabilities

This section analyzes the governmental constraints that may exist on the development of housing for persons with disabilities. State legislation (SB 520, 2001) requires the City to analyze the governmental constraints on the development of housing for persons with disabilities and demonstrate the City's efforts to remove such constraints, including accommodating procedures for the approval of group homes.

The City has analyzed it land use, zoning, and building code provisions and processes to determine what accommodations and constraints exist relative to housing for persons with disabilities. Persons with disabilities may reside in residential units in any zoning district that allows residential uses. Some may choose to reside in a residential facility or group home designed for occupancy by persons with disabilities or with supportive services.

The City's current definition of family places limitations on the number of unrelated persons, which could potentially pose a constraint on housing choice for persons with disabilities. The City's definition is as follows: "Family" means one person living alone; two or more persons related by blood, marriage or legal adoption; a group not in excess of five unrelated persons living together as a single housekeeping unit; and in addition thereto domestic employees." To remove the potential constraint presented by the City's definition of family, Implementation Program HI-1 has been included in this element which commits the City to updating the definition of family to a barrier-free definition (e.g., "One or more persons living together in a dwelling unit") to ensure it is consistent with State housing law. With the revision of the definition of family in the City's Zoning Code to a barrier-free definition, this would remove a potential constraint to non-licensed group home facilities.

The Zoning Code does not contain a definition of residential care facilities or group homes but does contain definitions for nursing homes, rooming houses, and boarding houses, which are defined as the following:

- Nursing homes: A structure operated as a lodging house in which nursing, dietary, and other personal services are rendered to convalescents, invalids, or aged persons, not including persons suffering from contagious or mental diseases, alcoholism, or drug addiction, and in which surgery is not performed and primary treatment, such as customarily is given in hospitals or sanitariums, is not provided. A convalescent home or a rest home shall be deemed a nursing home.
- Rooming House: A dwelling or structure occupied by four or more persons who have agreed to pay a specific rent for a specific space as distinguished from guests subject to innkeeper's liability.
- Boarding House: A dwelling, other than a hotel, wherein lodging and/or meals for four or more persons is provided for compensation.

The Zoning Code allows rest homes (which includes nursing homes and convalescent homes) in the R-1, PDR, and RC zones with a conditional use permit. Rooming and boarding houses are both allowed in the R-1, R-2, PDR, and HC zones with a conditional use permit. The Zoning Code does not contain a limit on the number of these housing types that may be in an area of the City. Additionally, these housing types must comply with the same site planning requirements that are applicable to other residential uses in the same zone.

Generally, the City's Zoning Code does not have limitations on housing that is specifically intended for persons with disabilities. The City's Zoning Code facilitates access for persons with disabilities by allowing uncovered porches, fire escapes, landing places, and ramps to extend into setbacks. However, to remove potential constraints relative to housing for persons with disabilities, Program HI-1 has been included in this element which commits the City to the following: 1) Amend the Zoning Code to allow for residential care homes with six or fewer persons by-right in all residential zones subject only to the same restrictions applicable to other residential uses in that zone; and 2) Amend the Zoning Code to allow larger group homes of seven or more persons in the R-3, MU, O, and PD-R zoning districts with a conditional use permit and subject only to the same restrictions applicable to other residential uses in that zone.

The City's Zoning Code also does not have a reasonable accommodation procedure. The City has included Implementation Program HI-1, which requires the City to develop a process for reasonable accommodation and provide information to individuals with disabilities about the process. With the amendments proposed in Program HI-1, the City's Zoning Code would not constrain the development, maintenance, improvement, or alteration of housing for persons with disabilities.

Accessory Dwelling Units

Section 17.24.270 of the Zoning Code defines accessory dwelling units (ADUs) as an attached or detached residential dwelling unit situated on the same lot as a primary unit, which provides complete independent living facilities for one or more persons. Assembly Bill (AB) 1866 requires local governments to use a ministerial process for considering accessory dwelling unit applications for the purpose of facilitating the production of affordable housing. During the 5th planning cycle, the City's accessory dwelling unit regulations were determined by HCD to be "null and void" due the numerous inconsistencies with State regulations. Since that time, City staff has deferred to current State regulations for accessory dwelling units. City staff has contacted HCD (adu@hcd.ca.gov) on several occasions to ask questions and receive clarification to ensure that State ADU regulations were being properly implemented in the City. To ensure the City's ADU standards are compliant and remain compliant, the City has included Program HI-1 to amend the Zoning Code to cite/reference State law for ADUs.

Local Processing and Permit Procedures

The City works to ensure that permit applications are processed in a timely fashion, and that permit processing procedures do not present a constraint to new development. Table 27 and Table 28 outline the estimated time required to process complete applications for a range of permits as well as an outline of the required processes for project approval. In addition, below is a description of the most common permit types that are required for single-family and multi-family housing development.

Table 27: Typical City Permit Process and Timelines

Type of Approval or Permit	Typical Processing Time	Approval Body
Building Permit	2-3 weeks	City Staff
Conditional Use Permit	2-3 months	Planning Commission

Type of Approval or Permit	Typical Processing Time	Approval Body
General Plan Amendment	3-4 months	Planning Commission and City Council
Zone Change	3-4 months	Planning Commission and City Council
Site Plan Approval	1-2 months	Planning Commission
Variance	1-2 months	Planning Commission
Parcel Maps	4-6 months	Planning Commission
Initial Study	3-4 months	Planning Commission
Environmental Impact Report	6-8 months	Planning Commission

Source: City of Blue Lake, 2022.

Table 28: Typical Processing Procedures by Project Type

	Single-Family Unit	Subdivision	Multi-family < 5 Units
Typical Approval Requirements	Principally Permitted	Parcel Map Review (including approval by Planning Commission and City Council)	Conditional Use Permit
			Site Plan Approval
		CEQA	CEQA
Estimated Total Processing Time	1 to 2 months	4 to 6 months	2 to 3 months

Source: City of Blue Lake, 2022.

In the City of Blue Lake, the processing and permit procedures are not a constraint for experienced applicants and developers. However, there are sometimes delays in the submittal of building permit applications after planning approval is received for housing projects. There are several reasons for this including, but not limited to: 1) ability of the applicant and their consultants to comply with conditions of approval, mitigation measures, and other regulatory requirements; 2) ability of the applicant and their consultants to prepare complete building plans that comply with City and State code standards; and 3) the limited availability of City staff to navigate the applicant and their consultants through the process. Because of the primary reasons for these delays, this is not a governmental constraint over which the City has control. To assist applicants with their submittals, the City Building Official and City Planner hold office hours where applicants may schedule appointments (at no cost) to ask questions and receive guidance. Although there are limited appointments available (weekly for Building Official and bi-weekly for City Planner), many applicants have found this service to be helpful in assisting them through the process. On average, it takes applicants approximately two months to submit a building permit application after receiving planning approval.

Conditional Use Permit

As indicated in Table 24, the zones in the City that allow multi-family development all require a conditional use permit for projects proposing five or more units. As indicated in Table 27 and Table 28, the Conditional Use Permit process typically takes approximately 2-3 months to complete. The requirements for Conditional Use

Permits are contained in Zoning Code Section 17.28.030. As stated in Section 17.28.030(A), "*Use permits may be granted, upon application to the Planning Commission for any use for which a use permit is permitted or required by these regulations, or for any use which, while not specifically enumerated in these regulations, is, in the opinion of the Planning Commission, similar to and compatible with the uses permitted in the zone in which the subject property is situated*." Zoning Code Section 17.28.030(F) lists the findings that the Planning Commission must make before granting a use permit, which includes:

- That the proposed location of the conditional use is in accord with the objectives of subsection A of this section and the purposes of the zone in which the site is located.
- That the proposed location of the conditional use and the conditions under which it would be operated or maintained will not be detrimental to the public health, safety, or welfare, or materially injurious to properties or improvements in the vicinity.

Due to the discretionary nature of the Conditional Use Permit process and the subjective review criteria noted above, there is the potential for the use permit process to be a potential constraint to the development of multi-family housing in the City. To ensure that the use permit process does not inhibit multi-family development, the City will adopt and apply a Combining Zone to sites greater than 1-acre in the R-3, MU, O, or PDR zones to allow multi-family residential uses by-right (see Program HI-14).

Site Plan Approval

The City of Blue Lake has a design review type process known as Site Plan Approval, which is required as part of the use permit process or when it is specifically required in a zoning district for principally permitted uses. With the exception of single-family structures, Site Plan Approval is required for most development on the sites categorized as vacant and likely developable in Table 21. As indicated in Table 27, the Site Plan Approval process typically takes approximately 1-2 months to complete. Section 17.24.250 of the Zoning Code provides the requirements for Site Plan Approval, which includes the "Principles to Be Followed" for Planning Commission review of a project. The principals to be followed include:

1. Review of buildings or structures for scale, mass, proportion, use of materials, relationship to adjacent elements and relationship to the community as a whole.

2. Review of proposed exterior color and material application with relationship to adjacent architectural or natural elements.

3. Review of proposed location, height and materials of walls, fences, hedges and screen plantings to ensure harmony with adjacent development or to conceal storage area, utility installations or other unsightly development. The planting of ground cover or other surfacing to prevent dust and erosion. The unnecessary destruction of existing healthy trees and woody vegetation.

4. Review of location, color, size, height, lighting, and landscaping of outdoor advertising signs and structures, in relation to traffic hazards and the appearance and harmony with the environment.

5. Review of location, height and material of walls, fences, hedges and screen plantings.

6. Review of site layout considering the orientation and location of buildings and open spaces in relation to the physical characteristics of the site, the character of the neighborhood, the appearance and harmony of the buildings with adjacent development and the surrounding landscape.

7. Review of the effect of the site development plan on traffic conditions on abutting streets. The layout of vehicular and pedestrian entrances, exits, drives and walkways. The adequacy of off-street parking facilities to prevent traffic congestion. The location, arrangement, and dimensions of truck loading and unloading facilities. The circulation patterns within the boundaries of the development. The surfacing and lighting of off-street parking facilities.

8. Review of the effect of the site development plan on the adequacy of storm and surface water drainage.

9. Review of the location, height, size, wattage, and shielding of outdoor lighting.

10. Nothing contained herein shall be construed as restricting or curtailing any of the powers of the Planning Commission of the City of Blue Lake.

The above principles to be followed contain several criteria that would allow the potential for personal or subjective judgement by decision makers, which is inconsistent with the requirements of the Housing Accountability Act (HAA; Government Code Section 65589.5, subdivision (f)). The requirements of the HAA are intended to provide developers certainty in what standards, conditions, and policies apply to their project and how those standards can be met. Local governments that deny a project due to a failure to meet subjective standards could be in violation of the HAA. Local governments are not prohibited from requiring a housing development project to comply with objective, quantifiable, written development standards, conditions, and policies. Objective standards are defined as those that involve no personal or subjective judgment by a public official and being uniformly verifiable by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant or proponent and the public official reviewing the project. The following language from the "Principles to Be Followed" for Site Plan Approval do not meet the definition of objective:

- Relationship to adjacent elements and the community as a whole.
- Relationship to adjacent architectural or natural elements.
- To ensure harmony with adjacent development.
- The appearance and harmony with the environment.
- In relation to the physical characteristics of the site, the character of the neighborhood, the appearance and harmony of the buildings with adjacent development and the surrounding landscape.

To address the inconsistency of the "Principles to Be Followed" with State housing law (Government Code Section 65589.5, subdivision (f)), Program HI-21 has been included in this element which commits the City to replacing the subject review criteria for the Site Plan Approval process (Zoning Code Section 17.24.250(F)) with objective standards.

Design Guidelines

The City of Blue Lake has design guidelines specific to three categories: Residential Design Guidelines for Historic Designated Structures, Downtown Design Guidelines, and Mixed-use Design Guidelines. The City's design guidelines aim to preserve the community's identity and unique character. The purpose and applicability of the three categories of guidelines is provide below.

- **Residential Design Guidelines for Historic Designated Structures.** These design guidelines were developed to: a) assist in the preservation of the area's historic uniqueness; b) promote new construction and alterations of existing structures which will be aesthetically pleasing; c) maintain the residential architecture of Blue Lake; and d) encourage development appropriate to the working class character of the town. These are also intended to assist owners/buyers in making decisions about the wide range of issues affecting the appearance of their property in its setting. It is not the intent of these guidelines to consider any interior changes or uses but to encourage consistency with retention of the exterior character and feel of the structure. Furthermore, items such as trim, shutters, paint color and other items not of a permanent nature that can be changed are not covered by these guidelines.

Because they apply to existing historic designated structures, these guidelines are not applicable to the sites categorized as vacant and likely developable in the sites inventory of this element.

- **Downtown Design Guidelines.** These design guidelines were developed as part of the Blue Lake's downtown revitalization project to: a) assist in the preservation of that area's historic uniqueness; b) promote new construction and alterations of existing structures which will be aesthetically pleasing; c) maintain the "no frills" architecture of the designated area; and d) encourage development appropriate to the working-class character of the town. They are also intended to assist owners/buyers in making decisions about a wide range of issues affecting the "look" of their property in its setting. These guidelines are intended to provide recommendations for development within the City Center boundary delineated in the General Plan Downtown Element, which primarily consists of sites that are zoned Mixed-Use (MU), Retail Commercial (RC), and Service Commercial (SC). These guidelines are only applicable to two of the MU zoned sites (APNs 025-071-012 and 025-076-006) categorized as vacant and likely developable in the site inventory of this element (see **Table 21**).
- **Mixed-Use Design Guidelines.** These design guidelines were developed to allow for the compatible and beneficial mixture of residential and commercial uses in specific areas of the City. These guidelines apply to sites that are zoned Mixed-Use and are located outside of the City Center boundary delineated in the General Plan Downtown Element. These guidelines are only applicable to one of the MU zoned sites (APNs 025-141-007) categorized as vacant and likely developable in the site inventory of this element (see **Table 21**).

Although some of the City's zoning districts state that development is subject to the above guidelines (see MU zone, Municipal Code Section 17.16.110.E), they have not technically been adopted as part of the Municipal Code and, therefore, are only recommendations and not enforceable standards for development in the City. In addition, the guidelines only apply to historic designated structures (Residential Design Guidelines for Historic Designated Structures), development in the City Center boundary (Downtown Design Guidelines), and development on the sites zoned Mixed-Use that are outside of the City Center boundary (Mixed-Use Design Guidelines). As noted above, the City's design guidelines only apply to three sites (APNs 025-071-012, 025-076-006, and 025-141-007) that are categorized as vacant and likely developable in the sites inventory of this element. As indicated in **Table 21**, these sites have an estimated realistic unit potential of eight units that are identified as being suitable for the above moderate-income category. Due to the limited applicability of the City's design guidelines to the sites identified as being suitable for meeting the City's RHNA, the guidelines are not considered to be a significant constraint on new housing development in Blue Lake. To minimize confusion regarding the applicability of the City's design guidelines, Program HI-22 has been included in this element which commits the City to revising references to the guidelines in the Zoning Code to make it clear that they are recommendations and not enforceable standards.

Permit Processing Fees

State law requires that local permit processing fees charged by local governments must not exceed the estimated actual cost of processing the permits. The City uses full-cost recovery for its planning and building permitting and ministerial approval processes. The most common discretionary planning approvals for housing development in the City are conditional use permits, site plan approval, and minor subdivisions. The fee deposits currently charged by the City for processing the various application types are listed in **Table 29**. Compared with the fees charged by the County for development in the unincorporated areas and the larger cities in the County (i.e., Arcata and Eureka), Blue Lake's fees are generally lower. These fees represent a very small part of the overall value of each residential unit, so do not represent a constraint to housing development.

Table 29: Permit Processing Fees

Permit	Fee
General Plan Amendment	Actual Cost - $1,170 deposit
Zone Change	Actual Cost - $880 deposit
Conditional Use Permit	Actual Cost - $650 deposit
Site Plan Approval	Actual Cost - $440 deposit
Variance	Actual Cost - $430 deposit
Minor Subdivision (4 parcels or less)	Actual Cost - $1,700 deposit
Major Subdivision (4 parcels or more)	Actual Cost - $1,680 deposit plus $240 per parcel
Lot Line Adjustment	Actual Cost - $350 deposit
Parcel Merger	Actual Cost - $350 deposit
Initial Study and Negative Declaration	Actual Cost - $465 deposit
Environmental Impact Report	Actual Cost (Review Only) - $1,170 deposit
Home Occupation Permit	$100
Appeal	Equal to the filing fees - $100 min. to $650 max.

Development Impact Fees

Currently, the City only requires development impact fees for each additional parcel created through a subdivision. These include a Parkland and Recreation Facilities fee of $232 per parcel and a Drainage Facilities Improvement fee of $465 per parcel. The City's existing development impact fees are relatively low and are not considered a constraint to development.

As noted in the section entitled "Water and Sewer Capacity," improvements to the City's wastewater treatment plant are required to ensure there is sufficient treatment capacity during the planning period. Future residential development in the City will be required to pay a fair share contribution towards these improvements, which will be based on the estimated number of residential equivalent units (REUs) for each project. Based on the estimated cost of the required improvements (<$500,000) and the number of additional REUs that would result (180 REUs), the fees are anticipated to be less than $2,800 per REU. Similar to the City's permit processing fees, these fees represent a very small part of the overall value of each residential unit, so would not represent a constraint to housing development.

Building and Code Enforcement

Building Standards

The City of Blue Lake's Municipal Code (Section 15.04.010) states that the California Building Standards Code, Title 24, California Code of Regulations, is adopted into the Municipal Code by reference. Municipal Code Section 15.04.020 states that all amendments and revisions to Title 24 are adopted by reference and become effective 180 days after publication in the State Building Standards Code by the State Building Standards Commission.

The City Building Official has indicated that staff currently uses the 2019 Edition of the California Building Code (CBC), which is the most recent amendment. The City has not made any local amendments to the 2019 CBC.

The City has amended the Uniform Building Code to match the local context by making the following housing development-related adjustments:

- Allowing the Building Inspector to halt occupancy and require property owners to bring buildings into compliance with load-bearing or setback regulations if they exceed the City's officially-adopted ordinances;
- Creating a Board of Appeals body to approve buildings materials and construction methods—full details of this body are defined in Municipal Code Chapter 2.32;
- Allowing the Building Official to employ a consultant if the Official requires specialized knowledge for ministerial review of an application; and
- Requiring the possession of an encroachment permit by an applicant if work occurs in a public right-of-way.

The City of Blue Lake Planning and Building Services Department views code enforcement as a means to ensure safe and uniform construction practices critical to providing decent, suitable shelter for all economic segments of the community, and to safeguard the general health, safety, and welfare of the community. The City of Blue Lake does not have a code enforcement department and code enforcement is conducted on a complaint basis by the Building Official and City Planner pursuant to the requirements of Municipal Code Chapter 8.04 (Nuisance Abatement). Therefore, enforcement of the Building Code and Zoning Code is not viewed as an obstacle to the provision of affordable housing in the city.

On- and Off-Site Improvements

Title 16 of the City's Municipal Code contains the standards for subdivisions, which requires a number of improvements in connection with the approval of subdivision maps. These include improvements to the frontage of the lot, stormwater management improvements, access improvements, and any required utility connections and improvements required to underground those utilities in most circumstances. The following are the general improvement requirements contained in Chapter 16.08 (Improvement Requirements) of the City's Subdivision Code:

A. The subdivider shall install improvements in accordance with the general requirements set forth in the subdivision agreement and this chapter, provided that the City Engineer may require technical changes if non-standard conditions arise during construction.

B. Inundation. If any portion of any land, within the boundaries shown on any such final map, is subject to overflow, inundation or flood hazard by storm waters, such fact and said portion shall be clearly shown on such final map on each sheet of said map and further adequate storm drain system and/or levees, dikes, pumping systems and other protective infrastructure shall be provided. All developments shall comply with Chapter 13.20 of the City of Blue Lake Municipal Code, as amended.

C. Streets and Highways. Design standards shall be based upon current Caltrans plans and specifications, AASHTO standards, City standards, and APWA standards, as approved by the City Engineer.

D. Structures. Structures shall be installed as deemed necessary by the City Engineer for drainage, access and/or public safety. Such structures to be placed to grades and to be of a design approved by the City Engineer. Structures supporting traffic shall be designed to accommodate H-20 loading.

E. Sidewalks, Curbs and Gutters. Curbs, gutters and sidewalks shall be of concrete and shall be installed according to standard plans and specifications of the City. Sidewalk width shall be as provided in Chapter 15.08 of the City of Blue Lake Municipal Code, as it is amended from time to time.

F. Sanitary Sewers. Sanitary sewer lines and appurtenances, including manholes, pump stations, and service lines, shall be provided within all subdivisions and shall connect with existing sewer lines and appurtenances. Where a sewer line is constructed or laid within a street, the subdivider shall install a lateral connection extending to the right-of-way line to serve each lot within the subdivision. Sanitary sewer lines, appurtenances, and service connections shall be constructed of a size, design, and laid to grades established and/or accepted by the City Engineer.

1. Where sanitary sewers are not available immediately adjacent to the proposed subdivision, or where pretreatment wastewater facilities are required as part of the development, connection to the City's sanitary sewer system shall be made in accordance with current policies as adopted by the City Council and Chapter 13.16 of the City of Blue Lake Municipal Code, all as amended.

2. All pumping systems, including drainage pumps, shall be designed in accordance with City standards and shall include both an economic analysis of the cost of operation of such system, and the source of financing for the operation of such system, and all shall be approved by the City Engineer.

G. Drainage Works.

1. The subdivider shall provide such drainage structures, including storm sewers, drainage channels and drainage pumps, as may be necessary for adequate drainage of surface and storm waters, and further including means for the disposal of surface and storm waters generated by the subdivision. Disposal of surface and storm waters into drainage wells or sewer lines shall not be permitted. Drainage facilities shall be installed as required by the City Engineer.

2. All pumping systems, including drainage pumps, shall be designed in accordance with City standards and shall include both an economic analysis of the cost of operation of such system, and the source of financing for the operation of such system, and all shall be approved by the City Engineer.

H. Water.

1. Adequate water supply and distribution system, water mains and fire hydrants connected to the water system serving the City of Blue Lake shall be installed by the subdivider. Where further development appears probable beyond the proposed subdivision, the subdivider may be required to install larger water mains to handle such additional development. Where additional storage facilities or pumps are required to serve the development, the developer may be required to have such facilities constructed. All development shall conform with Chapter 13.08 of the City of Blue Lake Municipal Code, as amended.

2. All pumping systems, including drainage pumps, shall be designed in accordance with City standards and shall include both an economic analysis of the cost of operation of such system, and the source of financing for the operation of such system, and all shall be submitted to the City Engineer.

3. A detailed computer analysis shall be submitted to the City Engineer which identifies the impacts upon the existing City system in the areas of distribution, storage supply, and water quality, unless waived by the City Engineer.

I. Street Trees. Street trees may be required by the Planning Commission and shall be of a type approved by the City Engineer and planted in locations approved by the City Engineer.

J. Street Lighting. Street lighting shall be as required by the Planning Commission and shall meet current City standard plans and specifications.

K. Railroad Crossings. Provisions shall be made for any and all railroad crossings necessary to provide access to or circulation within the proposed subdivision, including the preparation of all documents necessary for

application to the current railroad owner for the establishment and improvement of such crossings. The cost of such railroad crossing improvement shall be borne by the subdivider, and shall be designed and built consistent with current California State Public Utilities Commission requirements and standards.

L. Complete Improvement Plan. Three complete sets of improvement plans "as built" shall be filed with the Director of Public Works upon completion of said improvements. The three complete sets of plans shall be comprised of one reproducible set and two sets or blueprints. Upon receipt and acceptance of said "as-built" plans, the City Engineer will issue a certificate of acceptance when all requirements of the City are met.

M. Underground Utilities Required.

1. All utility distribution facilities, including but not limited to electric, communication and cable television lines, fire alarm systems, installed in and for the purpose of supplying service to any subdivision, shall be placed underground, except for equipment appurtenant to underground facilities, such as surface-mounted transformers, pedestal-mounted terminal boxes and meter cabinets, concealed ducts and poles supporting street lights.

2. All underground installation under roadway shall be completed prior to the paving of the roadway.

3. Public and private utility easements shall be provided by the subdivider as required. The subdivider shall make the necessary arrangements with the utility companies involved for the installation of said facilities.

The subdivision improvements required by the City of Blue Lake are relatively rudimentary and are comparable to the improvement standards required by the County and other local jurisdictions. Since these improvements are typically required by most jurisdictions for subdivisions and are necessary for public health and safety purposes, these requirements should not be considered a constraint on new housing development.

Nongovernmental Constraints

Development Costs

Local residential construction cost information was not readily available for the City of Blue Lake but residential construction cost data for Fortuna and Arcata—two Humboldt County cities which are similar in size and location both along U.S. Highway 101 and the coastline—was available. In Arcata, single-family residential construction costs ranged from $122 to $136 per square foot in 2019. Based on that estimate, the total construction cost for an average 1,200 square-foot single-family home would therefore equate to as low as $146,400 or as high as $163,000 total. The average multi-family residential development construction cost in Arcata was slightly higher at an approximate $245 per square-foot. Based on that estimate, the total construction cost for a multi-family development consisting of a gross total of 8,000 square feet was an estimated $1,959,696. This equates to an approximate construction cost of $244,962 per each 1,000 square-foot unit in the 8,000 square-foot, multi-family residential shell space. In Fortuna, the average single-family residential construction cost per square foot was $156 in 2019. Based on that estimate, therefore, the gross construction cost for a 1,200 square-foot, single-family home in Fortuna would be an estimated $187,200. There were no estimates available for multi-family residential construction costs in Fortuna.

Construction costs for both single- and multi-family residential developments in Blue Lake, therefore, are most likely similar to these estimates in both Fortuna and Arcata.

Construction costs vary widely according to the type of development, with multi-family housing generally less expensive to construct than single-family homes. However, wide variation within each construction type exists depending on the size of the unit and the number and quality of amenities provided, such as fireplaces, accessory buildings, and interior fixtures, among others.

In addition to construction costs, the price of land is one of the largest components of housing development costs. Land costs vary depending on whether the site is vacant or has an existing use that must be removed. Similarly, site constraints such as environmental issues (such as, steep slopes, soil stability, seismic hazards, or flooding) can also be factor in the cost of land. Other costs stem from professional services such as land surveying and engineering, soils engineering/analysis, site design, landscape and architectural design, and permit processing.

If labor or material costs increase substantially, the cost of construction in Blue Lake could rise to a level that impacts the price of new construction and rehabilitation. Therefore, increased construction costs have the potential to constrain new housing construction and the rehabilitation of existing housing. The City will continue to do its part in reducing development processing times and providing a more streamlined review process.

Availability of Financing

The cost of borrowing money to finance the construction of housing or to purchase a house affects the amount of affordably priced housing in Blue Lake. Fluctuating interest rates can eliminate many potential homebuyers from the housing market or render a housing project that could have been developed at lower interest rates infeasible. Typically, when interest rates decline, sales increase. The reverse has been true when interest rates increase. Table 30 illustrates interest rates as of November 17, 2022. The table presents both the interest rate and the annual percentage rate (APR) for different types of home loans.

Table 30: Interest Rates

Conforming	Interest	APR
30-Year Fixed	6.250	6.433
15-Year Fixed	5.750	6.065
Jumbo		
30-Year Fixed	5.500	5.622
15-Year Fixed	5.250	5.435

Source: www.wellsfargo.com, November 17, 2022.

Financing for both construction and long-term mortgages is generally available in Humboldt County subject to normal underwriting standards. First-time homebuyers are the group most impacted by financing requirements. As indicated in Table 30, mortgage interest rates for new home purchases currently range from 5.5 to 6.25 percent for a fixed-rate 30-year loan. Lower initial rates are available with graduated payment mortgages, adjustable-rate mortgages, and buy-down mortgages; however, the subprime crisis has affected the availability of dollars for home mortgages. Variable interest rate mortgages on affordable homes may increase to the point where the interest rate exceeds the cost-of-living adjustments, which is a constraint to affordability. Although rates are currently low relative to historic rates, they can change significantly and impact the affordability of housing stock. Interest rates have increased by several percentage points over the last year, which has impacted the affordability of housing to some extent. A more critical impediment to homeownership involves the affordability of the housing stock and the ability of potential buyers to fulfill down payment requirements. Conventional home loans typically require 5 to 20 percent of the sales price as a down payment, which is the largest constraint to first-time homebuyers. This indicates a need for flexible loan programs and a method to bridge the gap between the down payment and a potential homeowner's available funds. To assist in lowering the barriers for first-time homebuyers, Program HI-4 has been included in this element which commits the City to pursuing grant funding through the CalHome program.

Due to the City's relatively small size, minimal staff, and limited resources, the City of Blue Lake does not have a housing trust fund or other financing programs to facilitate the development and preservation of affordable housing. The City also does not have any rental-based assistance programs. Some of these programs do exist in the larger cities in the County (i.e., Eureka, Arcata, and Fortuna), some of which are administered by the Housing Authority of the City of Eureka and County of Humboldt. The development of affordable housing in the County primarily occurs in the larger cities and requires assistance from government funding programs such as those administered by the U.S. Department of Housing and Urban Development (HUD) and the California Department of Housing and Community Development (HCD). Having a Housing Element that is compliant with State housing law increases the availability of State and federal funding programs needed to facilitate affordable housing development.

Non-governmental constraints such as the availability of financing are generally market driven and outside of the control of local government. However, Housing Element law requires jurisdiction to assess these constraints as a basis for possible action to offset their effects. Programs HI-3, HI-4, and HI-5 have been included in the element to address non-governmental constraints. These programs commit the City to advertising available subsidized housing programs, pursuing grant funding through the CalHome program, and working with developers to identify and pursue grant and funding opportunities for housing development.

Price of Land

An online survey of listings of vacant lots on Trulia and Craigslist in March 2022 indicated that there were no vacant lots available for sale in Blue Lake proper or in the unincorporated area surrounding Blue Lake. Most of the current real estate listings in the unincorporated areas surrounding the City are for cannabis farms, which are in rural locations and may have limited potential for residential development due to various constraints.

The City provided data summarizing land sales within city limits since 2014, which was the beginning of the 5th planning cycle. Table 31 describes each year the land sales occurred and how much each lot was sold for. When viewing the data, it becomes clear that most vacant lots have sold between $140,000 and $225,000 in Blue Lake. Most of these lots are between 7,000 – 12,000 s.f. except for the 3.1-acre parcel (APN 025-101-023) that has significant constraints due to onsite wetlands, limited access, and a narrow lot width. It is anticipated that the cost of vacant land has increased in the last two years since the cost of housing has increased by at least 15 percent in the more developed areas of the County.

Table 31: Vacant Lots Sold 2014-2021

APN	Lot Size	Year Sold	Cost
025-101-023	3.1 acre	2014	$195,000
025-062-012	0.17 acres	2016	$139,000
025-081-006, -008	0.28 acres	2017	$170,000
025-076-006	0.17 acres	2021	$225,000

Source: City of Blue Lake, 2022

Appendix - Residential Energy Conservation

Housing elements must include a review of opportunities to encourage energy conservation in residential development (Government Code Section 65583(a)(7)). Energy conservation policies could reduce housing costs, promote sustainable design, and help reduce greenhouse gases. Title 24 of the California Administrative Code sets mandatory energy standards for new development and requires the adoption of an "energy budget."

The California Department of Housing and Development encourages jurisdictions to take steps toward better energy conservation through their housing element updates. Policy ideas are listed on HCD's website to help jurisdictions toward this goal. Additional resources are listed below.

Energy Conservation Resources

California Solar Initiative Rebates

Rebates vary according to system size, customer class, and performance and installation factors (www.gosolarcalifornia.org). There are two rebate programs: Expected Performance-Based Buydown (for systems that are less than 30 kilowatts) and Performance-Based Incentive (for all systems greater than 30 kilowatts).

Single-Family Affordable Solar Housing

The Single-Family Affordable Solar Housing (SASH) program offers incentives to qualified low-income homeowners to help offset the costs of a solar electric system. The SASH program is overseen by the California Public Utilities Commission and administered by GRID Alternatives, a nonprofit organization.

California Solar Initiative Multi-family Affordable Solar Housing

The Multi-family Affordable Solar Housing (MASH) program offers solar incentives for qualifying affordable multi-family dwellings. The program is overseen by the California Public Utilities Commission and offers incentives to qualifying affordable housing within the service territories of PG&E, Southern California Edison Company, and San Diego Gas & Electric. MASH provides fixed, upfront, capacity-based incentives for qualifying solar energy systems. The amount of the incentive depends on which track the applicant is eligible for.

Federal Solar Investment Tax Credit

The Federal Investment Tax Credit (ITC) for residential and commercial solar systems is 26 percent of net system cost. This tax credit was available on residential properties that commenced construction by 2020. The ITC then stepped down to 22 percent in 2021. After 2023, the residential credit will drop to zero, while the commercial and utility credit will drop to a permanent 10 percent.

Redwood Coast Energy Authority and Pacific Gas & Electric

PG&E owns and maintains all the electrical and natural gas infrastructure in Humboldt County. In May 2017, all electrical services were transferred from PG&E's management to a newly-appointed joint power authority called the Redwood Coast Energy Authority (RCEA). The RCEA includes the County of Humboldt; the cities of Arcata, Blue Lake, Eureka, Ferndale, Fortuna, Rio Dell, and Trinidad; and the Humboldt Bay Municipal Water District. RCEA's goal is to implement sustainable energy programs to reduce energy demand and enhance regional energy efficiency. RCEA's energy sources come from more renewable sources (e.g. biomass & biowaste,

geothermal, eligible hydroelectric, solar electric, and wind). Residents may opt out of RCEA's power supply and return to PG&E service when they wish but residents otherwise are automatically opted in by default to RCEA's power service when they purchase property in Humboldt County. RCEA currently has a goal to adopt completely renewable energy sources by 2025 and furthermore achieve 100% local renewable electricity in 2030.

The Authority administers a number of programs for its customers, including residents in Blue Lake, including:

- Free Energy Advisor Consultation.
- Supporting installations of electric vehicle charging stations.
- Free Energy Efficiency Kit.

For residents who opt out of RCEA and return to PG&E energy service, PG&E offered the following energy conservation programs as of March 2020 (www.pge.com):

- SmartAC. Provides free equipment and installation for the efficient regulation of central air conditioning systems and heat pumps for residential and small business customers.
- AC Quality Care Program. Provides rebates to customers to help pay for work done by AC Quality Care certified contractors.
- Energy analyzers and calculators (online).
- Zero Net Energy (ZNE) program. Began in 2010 to support the 2008 California Long Term Energy Efficiency Strategic Plan; ZNE goals state that all new residential construction will be ZNE by 2020.
- Rebate Program. Offers a range of rebates on energy-saving products for residential owners.
- Home Upgrade program. Offers up to $4,500 in rebates from PG&E for energy-efficiency upgrade projects.
- Energy Upgrade California Home Upgrade rebate program.

Local Program

The City of Blue Lake has chosen to endorse a component of the RePower Strategic Plan, referred to as the Mad River Valley Community Energy Upgrade Program. This pilot project focuses on energy efficiency, solar energy systems, and heat pumps for residences and businesses, as well as recruitment and training of contractors and equipment technicians throughout the Mad River Valley. The goal of the project is to develop and implement an innovative, community-based energy upgrade program in the Mad River Valley Community that will demonstrate a sustainable model for financing and market deployment across all Humboldt County.

Appendix - Glossary

Affordable Housing: Under State and federal statutes, housing which costs no more than 30 percent of gross household income. Housing costs include rent or mortgage payments, utilities, taxes, insurance, homeowner association fees, and other related costs. TRPA defines affordable housing as deed-restricted housing to be used exclusively for lower-income households (income not in excess of 80 percent of the county's median income) and for very low-income households (income not in excess of 50 percent of the county's median income), and with costs that do not exceed recommended state and federal standards.

Assisted Housing: Housing that has been subsidized by federal, state, or local housing programs.

California Department of Housing and Community Development - HCD: The State Department responsible for administering State-sponsored housing programs and for reviewing housing elements to determine compliance with State housing law.

CalHome Program: A grant program administered by HCD and awarded to local public agencies and nonprofits to be used to assist local homeownership programs aimed at lower and very-low income households in order to increase and maintain homeownership, encourage neighborhood revitalization and sustainable development, and maximize the use of existing homes.

Census: The official United States decennial enumeration of the population conducted by the federal government.

Community Development Block Grant (CDBG): A grant program administered by the U.S. Department of Housing and Urban Development (HUD) on a formula basis for entitlement communities, and by the State Department of Housing and Community Development (HCD) for non-entitled jurisdictions. This grant allots money to cities and counties for housing rehabilitation and community development, including public facilities and economic development.

Compatible: Capable of existing together without conflict or ill effects.

Condominium: A building or group of buildings in which units are owned individually, but the structure, common areas and facilities are owned by all owners on a proportional, undivided basis.

Consistent: Free from variation or contradiction. Programs in the General Plan are to be consistent, not contradictory or preferential. State law requires consistency between a general plan and implementation measures such as the zoning ordinance.

Contract Rent: The monthly rent agreed to, or contracted for regardless of any furnishings, utilities, or services that may be included.

Density: The number of dwelling units per unit of land. Density usually is expressed "per acre," e.g., a development with 100 units located on 20 acres has density of 5.0 units per acre.

Density, Residential: The number of permanent residential dwelling units per acre of land. Densities specified in the General Plan may be expressed in units per gross acre or per net developable acre.

Density Bonus: The allocation of development rights that allows a parcel to accommodate additional square footage or additional residential units beyond the maximum for which the parcel is zoned. Under Government Code Section 65915, a housing development that provides 20 percent of its units for lower income households, or ten percent of its units for very low-income households, or 50 percent of its units for seniors, is entitled to a density bonus and other concessions.

Developable Land: Land that is suitable as a location for structures and that can be developed free of hazards to, and without disruption of, or significant impact on, natural resource areas.

Development Impact Fees: A fee or charge imposed on developers to pay for a jurisdiction's costs of providing services to new development.

Development Right: The right granted to a land owner or other authorized party to improve a property. Such right is usually expressed in terms of a use and intensity allowed under existing zoning regulation. For example, a development right may specify the maximum number of residential dwelling units permitted per acre of land.

Dwelling, Multi-family: A building containing two or more dwelling units for the use of individual households; an apartment or condominium building is an example of this dwelling unit type.

Dwelling, Single-family Attached: A one-family dwelling attached to one or more other one-family dwellings by a common vertical wall. Row houses and town homes are examples of this dwelling unit type.

Dwelling, Single-family Detached: A dwelling, not attached to any other dwelling, which is designed for and occupied by not more than one family and surrounded by open space or yards.

Dwelling Unit: A room or group of rooms (including sleeping, eating, cooking, and sanitation facilities), that constitutes an independent housekeeping unit, occupied or intended for occupancy by one household on a long-term basis.

Element: A division or chapter of the General Plan.

Emergency Shelter: An emergency shelter is a facility that provides shelter to homeless families and/or homeless individuals on a limited short-term basis.

Encourage: To stimulate or foster a particular condition through direct or indirect action by the private sector or government agencies.

Enhance: To improve existing conditions by increasing the quantity or quality of beneficial uses or features.

Family: (1) Two or more persons related by birth, marriage, or adoption [U.S. Bureau of the Census]. (2) An individual or a group of persons living together who constitute a bona fide single-family housekeeping unit in a dwelling unit, not including a fraternity, sorority, club, or other group of persons occupying a hotel, lodging house or institution of any kind [California].

Feasible: Capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.

General Plan: The General Plan is a legal document, adopted by the legislative body of a City or County, setting forth policies regarding long-term development. California law requires the preparation of seven elements or chapters in the General Plan: Land Use, Housing, Circulation, Conservation, Open Space, Noise, and Safety. Additional elements are permitted, such as Economic Development, Urban Design and similar local concerns.

Goal: The ultimate purpose of an effort stated in a way that is general in nature and immeasurable.

Gross Rent: Contract rent plus the estimated average monthly cost of utilities (water, electricity, gas) and fuels (oil, kerosene, wood, etc.) To the extent that these are paid for by the renter (or paid for by a relative, welfare agency, or friend) in addition to the rent.

Group Quarters: A facility which houses groups of unrelated persons not living in households (U.S. Census definition). Examples of group quarters include institutions, dormitories, shelters, military quarters, assisted living facilities and other quarters, including single-room occupancy (SRO) housing, where 10 or more unrelated individuals are housed.

Homeless: Unsheltered homeless are families and individuals whose primary nighttime residence is a public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings (e.g., the street, sidewalks, cars, vacant and abandoned buildings). Sheltered homeless are families and persons whose primary nighttime residence is a supervised publicly or privately operated shelter (e.g., emergency, transitional, battered women, and homeless youth shelters; and commercial hotels used to house the homeless).

Household: All those persons—related or unrelated—who occupy a single housing unit.

Household Income: The total income of all the persons living in a household. A household is usually described as very low income, low income, moderate income, and upper income based upon household size, and income, relative to the regional median income.

Housing and Community Development, Department of (HCD): The State agency that has principal responsibility for assessing, planning for, and assisting communities to meet the needs of low- and moderate-income households.

Housing and Urban Development, U.S. Department of (HUD): A cabinet-level department of the federal government that administers housing and community development programs.

Housing Authority, Local (LHA): Local housing agency established in State law, subject to local activation and operation. Originally intended to manage certain federal subsidies, but vested with broad powers to develop and manage other forms of affordable housing.

Housing Unit: The place of permanent or customary abode of a person or family. A housing unit may be a single-family dwelling, a multi-family dwelling, a condominium, a modular home, a mobile home, a cooperative, or any other residential unit considered real property under State law. A housing unit has, at least, cooking facilities, a bathroom, and a place to sleep. It also is a dwelling that cannot be moved without substantial damage or unreasonable cost.

Impact Fee: A fee, also called a development fee, levied on the developer of a project by a city, county, or other public agency as compensation for otherwise-unmitigated impacts the project will produce.

Implementation Program: An action, procedures, program, or technique that carries out general plan policy. Implementation programs also specify primary responsibility for carrying out the action and a time frame for its accomplishment.

Income Category: Four categories are used to classify a household according to income based on the median income for the county. Under state housing statutes, these categories are defined as follows: Very Low (0-50% of County median); Low (50-80% of County median); Moderate (80-120% of County median); and Upper (over 120% of County median).

Infill Development: Development of vacant land (usually individual lots or left-over properties) within areas that are already largely developed.

Large Household: A household with 5 or more members.

Manufactured Housing: Housing that is constructed of manufactured components, assembled partly at the site rather than totally at the site. Also referred to as modular housing.

Median Income: The annual income for each household size within a region which is defined annually by HUD. Half of the households in the region have incomes above the median and half have incomes below the median.

Mitigate: To ameliorate, alleviate, or avoid to the extent reasonably feasible.

Mixed-use: Properties on which various uses, such as office, commercial, institutional, and residential, are combined in a single building or on a single site in an integrated development project with significant functional interrelationships and a coherent physical design. A "single site" may include contiguous properties.

Mobile Home: A structure, transportable in one or more sections, built on a permanent chassis and designed for use as a single-family dwelling unit and which (1) has a minimum of 400 square feet of living space; (2) has a minimum width in excess of 102 inches; (3) is connected to all available permanent utilities; and (4) is tied down (a) to a permanent foundation on a lot either owned or leased by the homeowner or (b) is set on piers, with wheels removed and skirted, in a mobile home park.

Multi-family Dwelling Unit: A building or portion thereof designed for or occupied by two or more families living independently of each other, including duplexes, triplexes, quadplexes, apartments, and condominiums.

Overcrowding: Households or occupied housing units with 1.01 or more persons per room.

Parcel: A lot in single ownership or under single control, usually considered a unit for purposes of development.

Poverty Level: As used by the U.S. Census, families and unrelated individuals are classified as being above or below the poverty level based on a poverty index that provides a range of income cutoffs or "poverty thresholds" varying by size of family, number of children, and age of householder. The income cutoffs are updated each year to reflect the change in the Consumer Price Index.

Quantified Objective: The housing element must include quantified objectives which specify the maximum number of housing units that can be constructed, rehabilitated, and conserved by income level within a five-year time frame, based on the needs, resources, and constraints identified in the housing element (§65583 (b)). The number of units that can be conserved should include a subtotal for the number of existing assisted units

subject to conversion to non-low-income households. Whenever possible, objectives should be set for each particular housing program, establishing a numerical target for the effective period of the program. Ideally, the sum of the quantified objectives will be equal to the identified housing needs. However, identified needs may exceed available resources and limitations imposed by other requirements of state planning law. Where this is the case, the quantified objectives need not equal the identified housing needs, but should establish the maximum number of units that can be constructed, rehabilitated, and conserved (including existing subsidized units subject to conversion which can be preserved for lower- income use), given the constraints.

Regional Housing Needs Plan (RHNP): The Regional Housing Needs Plan (RHNP) is based on State of California projections of population growth and housing unit demand and assigns a share of the region's future housing need to each jurisdiction within the AMBAG (Association of Monterey Bay Area Governments). These housing need numbers serve as the basis for the update of the Housing Element in each California city and county.

Regional Housing Needs Share: A quantification by a COG or by HCD of existing and projected housing need, by household income group, for all localities within a region.

Rehabilitation: The repair, preservation, and/or improvement of substandard housing.

Residential, Multiple Family: Usually three or more dwelling units on a single site, which may be in the same or separate buildings.

Residential, Single-family: A single dwelling unit on a building site.

Rezone: An amendment to the map and/or text of a zoning ordinance to effect a change in the nature, density, or intensity of uses allowed in a zoning district and/or on a designated parcel or land area.

Second Unit: A self-contained living unit, either attached to or detached from, and in addition to, the primary residential unit on a single lot. "Granny Flat" is one type of second unit intended for the elderly.

Seniors: Persons age 65 and older.

Shall: That which is obligatory or necessary.

Should: Signifies a directive to be honored if feasible.

Site: A parcel of land used or intended for one use or a group of uses and having frontage on a public or an approved private street. A lot.

Special Needs Groups: Those segments of the population which have a more difficult time finding decent affordable housing due to special circumstances. Under California Housing Element statutes, these special needs groups consist of the elderly, handicapped, large families, female-headed households, farmworkers and the homeless. A jurisdiction may also choose to consider additional special needs groups in the Housing Element, such as students, military households, other groups present in their community.

Subdivision: The division of a tract of land into defined lots in accordance with the Subdivision Map Act, either improved or unimproved, which can be separately conveyed by sale or lease, and which can be altered or developed.

Subsidize: To assist by payment of a sum of money or by the granting of terms or favors that reduce the need for monetary expenditures. Housing subsidies may take the forms of mortgage interest deductions or tax credits from federal and/or state income taxes, sale or lease at less than market value of land to be used for the construction of housing, payments to supplement a minimum affordable rent, and the like.

Substandard Housing: Residential dwellings that, because of their physical condition, do not provide safe and sanitary housing.

Supportive Housing: Housing with a supporting environment, such as group homes or Single Room Occupancy (SRO) housing and other housing that includes a supportive service component such as those defined below.

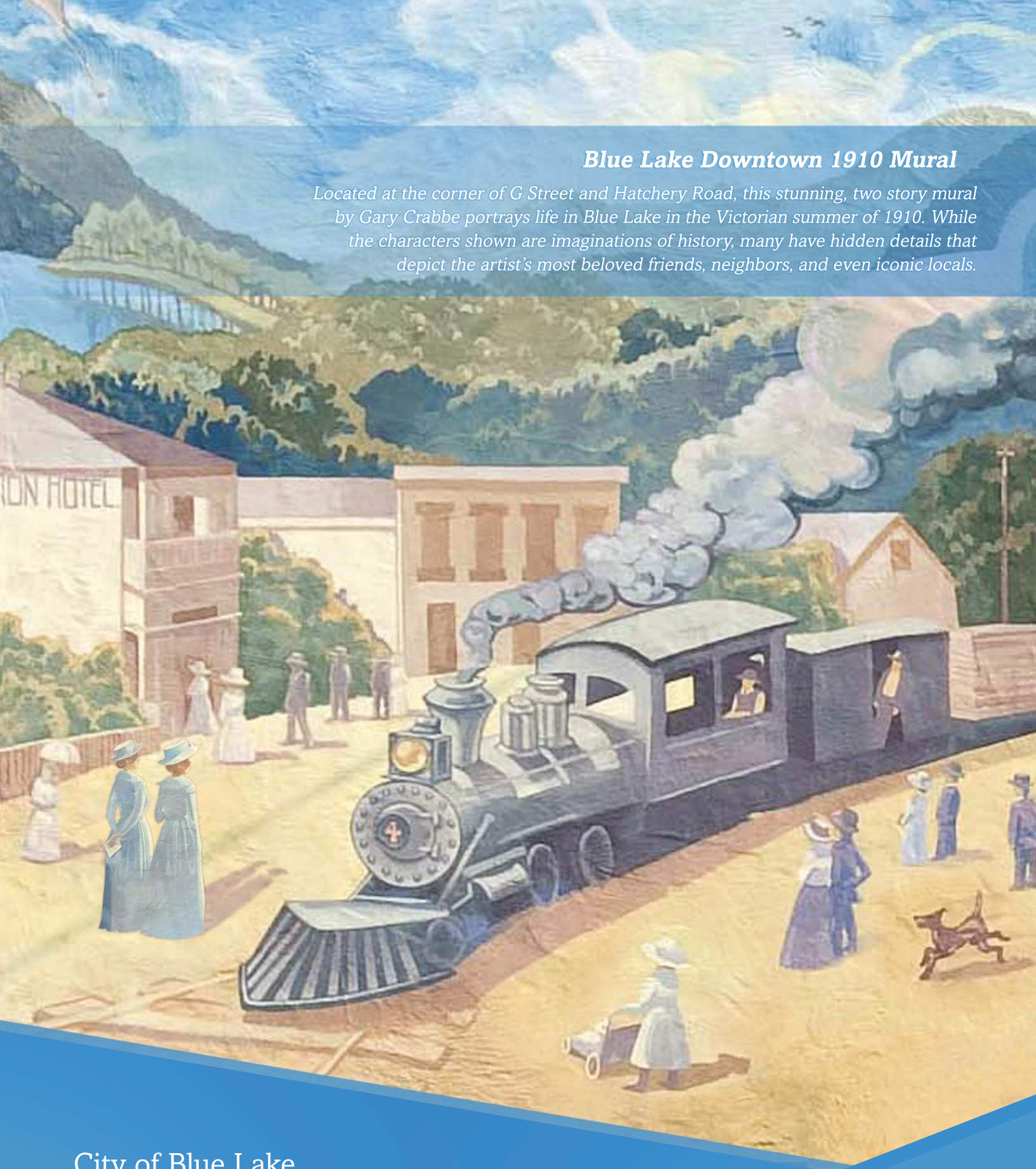
Supportive Services: Services provided to residents of supportive housing for the purpose of facilitating the independence of residents. Some examples are case management, medical or psychological counseling and supervision, child care, transportation, and job training.

Transitional Housing: Transitional housing is temporary (often six months to two years) housing for a homeless individual or family who is transitioning to permanent housing. Transitional housing often includes a supportive services component (e.g. job skills training, rehabilitation counseling, etc.) to allow individuals to gain necessary life skills in support of independent living.

U.S. Department of Housing and Urban Development (HUD): The cabinet level department of the federal government responsible for housing, housing assistance, and urban development at the national level. Housing programs administered through HUD include Community Development Block Grant (CDBG), HOME and Section 8, among others.

Vacant: Lands or buildings that are not actively used for any purpose.

Zoning: The division of a city or county by legislative regulations into areas, or zones, which specify allowable uses for real property and size restrictions for buildings within these areas; a program that implements policies of the General Plan.



Blue Lake Downtown 1910 Mural

Located at the corner of G Street and Hatchery Road, this stunning, two story mural by Gary Crabbe portrays life in Blue Lake in the Victorian summer of 1910. While the characters shown are imaginations of history, many have hidden details that depict the artist's most beloved friends, neighbors, and even iconic locals.

City of Blue Lake

Housing Element Update 2019-2027

Attachment 2

California Department of Housing and Community Development Review Letter for City of Blue Lake's 6th Cycle (2019-2027) Revised Draft Housing Element

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT
2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov

September 20, 2023

Amanda Mager, City Manager
City of Blue Lake
PO Box 458
Blue Lake, CA 95525

Dear Amanda Mager:

RE: City of Blue Lake's 6th Cycle (2019-2027) Revised Draft Housing Element

Thank you for submitting the City of Blue Lake's (City) revised draft housing element received for review on August 28, 2023. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review.

The revised draft element meets the statutory requirements of State Housing Element Law, including as described in HCD's August 29, 2022 review. However, the housing element cannot be found in substantial compliance until the City has completed necessary rezones as described below. The housing element will substantially comply with State Housing Element Law (Gov. Code, § 65580 et seq.) when the necessary rezoning is complete and the element is adopted, submitted to, and approved by HCD, in accordance with Government Code section 65585.

Generally, pursuant to Government Code section 65584.09, if a city did not make available sites to accommodate the regional housing need allocation (RHNA), then the city shall, within the first year of the planning period of the new element, rezone adequate sites to accommodate the unaccommodated portion of the RHNA from the prior planning period. The City has an unaccommodated need from the prior planning period (Table 20). Since more than a year has lapsed from the beginning of the current planning period, the element cannot be found in compliance until the required rezoning is complete. Specifically, the element cannot be found in compliance until Program HI-14 (Rezoning and By Right Procedures) is implemented to meet the unaccommodated need from the 5th cycle RHNA. Once the rezoning has been completed, the City should submit documentation (e.g., resolution, ordinance) to HCD and HCD will review and approve the element in accordance with Government Code section 65585.

As a reminder, pursuant to Government Code section 65583.3, the City must submit an electronic sites inventory with its adopted housing element. The City must utilize standards, forms, and definitions adopted by HCD. Please see HCD's housing element webpage at https://www.hcd.ca.gov/planning-and-community-development/housing-elements for a copy of the form and instructions. The City can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance.

Public participation in the development, adoption and implementation of the housing element is to effective housing planning. Throughout the housing element process, the City should continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available and considering and incorporating comments where appropriate. Please be aware, any revisions to the element must be posted on the local government's website and to email a link to all individuals and organizations that have previously requested notices relating to the local government's housing element at least seven days before submitting to HCD.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the City to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at: https://www.opr.ca.gov/planning/general-plan/guidelines.html.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant; the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities programs; and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City will meet housing element requirements for these and other funding sources.

HCD appreciates the hard work, cooperation, and responsiveness the City's housing element team provided throughout the housing element review and update. If HCD can provide assistance in implementing the housing element, please contact Andrea Grant, of our staff, at Andrea.Grant@hcd.ca.gov.

Sincerely,

Paul McDougall
Senior Program Manager

Attachment 3

Draft CEQA Negative Declaration for the Blue Lake General Plan Housing Element Update

September 2024 (**Revised November 2024)** | Initial Study

INITIAL STUDY FOR BLUE LAKE 2019-2027

HOUSING ELEMENT UPDATE

City of Blue Lake

Prepared for:

City of Blue Lake

Contact: Garry Rees, Contract City Planner

707-668-5655

https://bluelake.ca.gov

P.O. Box 458

111 Greenwood Ave

Blue Lake, California 95525

Prepared by:

SHN

Contact: Garry Rees, AICP

812 W Wabash Ave

Eureka, CA 95501

Initial Study

1. Project Title

The City of Blue Lake 2019-2027 Housing Element Update

2. Lead Agency Name and Address

City of Blue Lake
P.O. Box 458
111 Greenwood Ave
Blue Lake, California 95525

3. Contact Person and Phone Number

Garry Rees, Contract City Planner
707-668-5655
https://bluelake.ca.gov
P.O. Box 458
111 Greenwood Ave
Blue Lake, California 95525

4. Project Location

The project area is the entire City of Blue Lake in Humboldt County, California. The regional location and project area are shown in **Figure 1** and **Figure 2**. For a description of the City and its regional context see Section 9, Surrounding Land Uses and Setting.

5. Project Sponsor's Name and Address

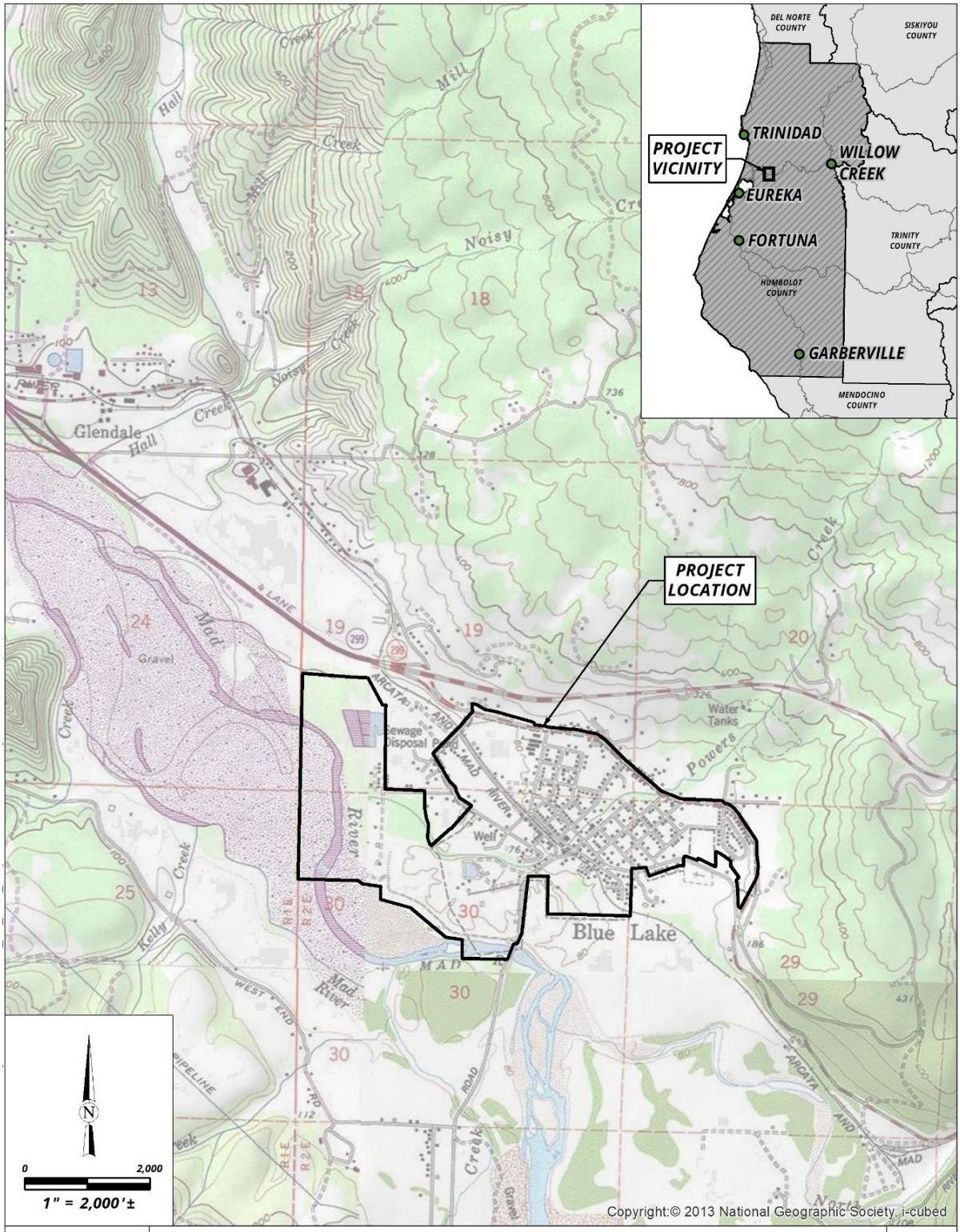
City of Blue Lake
P.O. Box 458
111 Greenwood Ave
Blue Lake, California 95525
Phone: 707-668-5655
Website: https://bluelake.ca.gov

6. General Plan Designation

City-wide

7. Zoning

City-wide

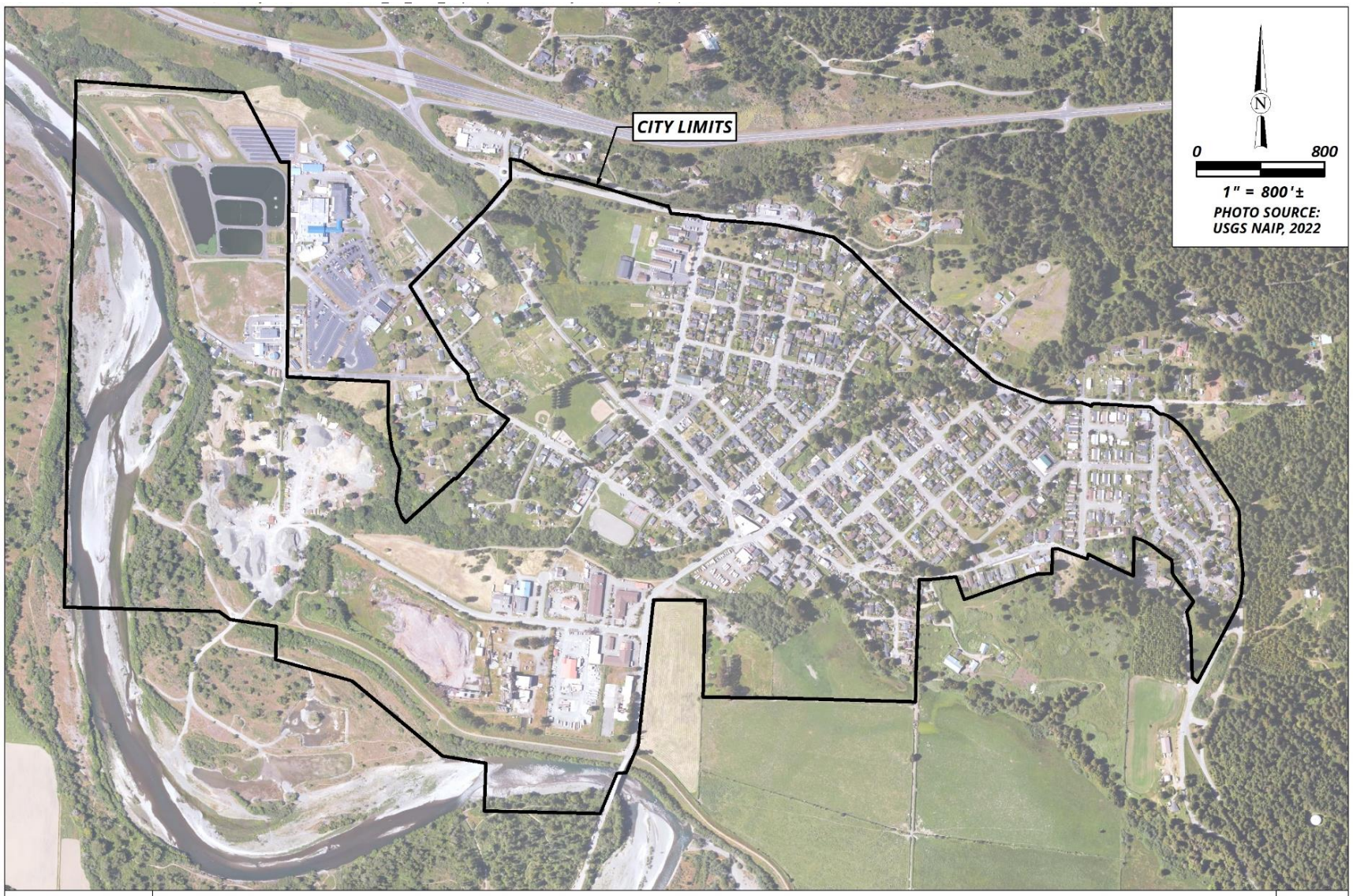


City of Blue Lake
Housing Element Update
Blue Lake, California

Project Location Map

February 2024 - 022168.100

Figure 1



City of Blue Lake
Housing Element Update
Blue Lake, California

City Limits Map

February 2024 - 022168.100

Figure 2

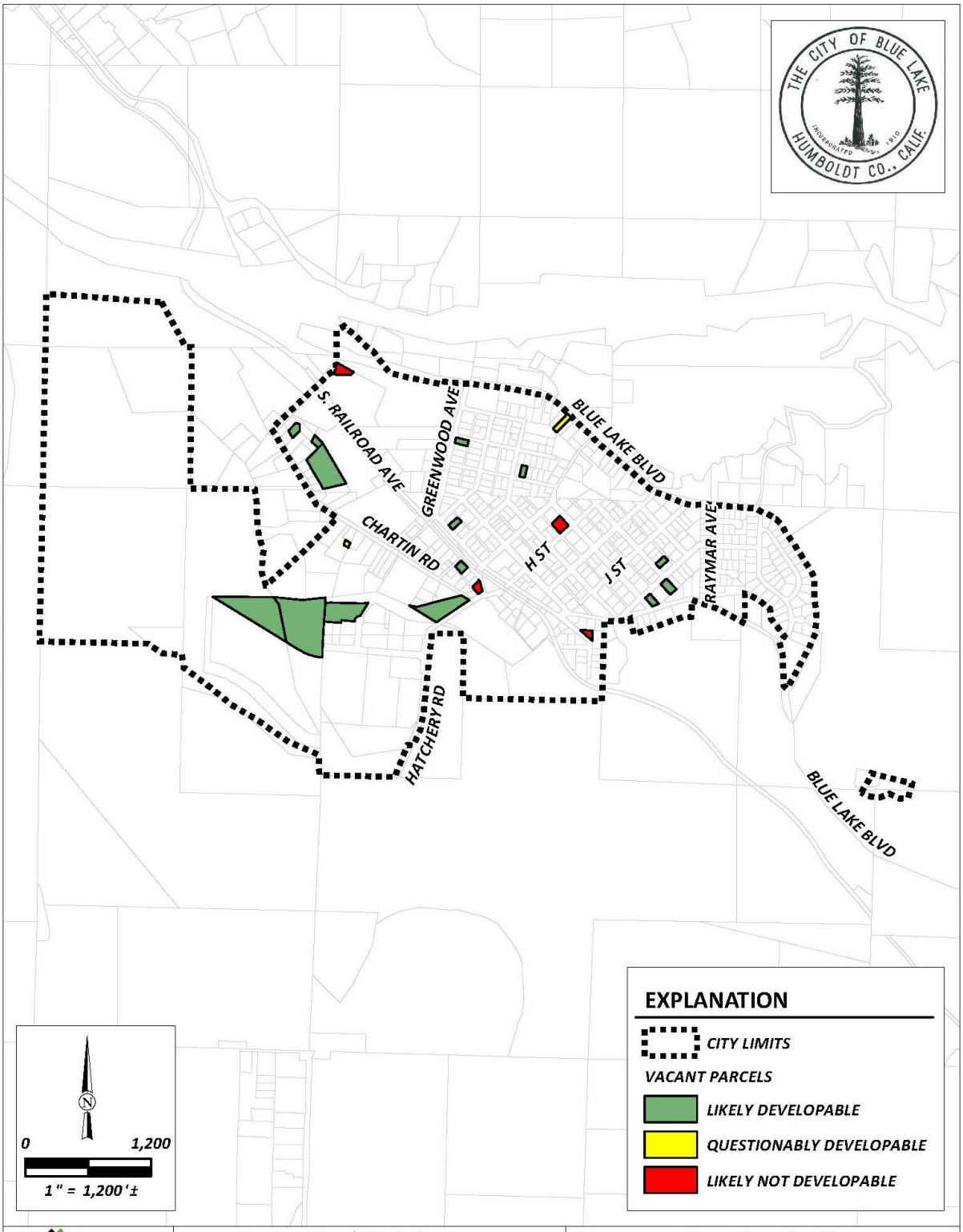
1. Project Description

Overview and Background

Under the requirements of state law, every city and county in California must prepare a Housing Element as part of its General Plan. The housing element must document in detail existing conditions and projected needs in accordance with state housing law provisions. The element is also required to contain goals, policies, programs, and quantified objectives that address housing needs over the next eight-year period. As part of the proposed project, the proposed 2019-2027 Housing Element Update will serve as the City of Blue Lake's guiding policy document that meets future needs of housing for all the City's economic groups.

The last housing element update adopted by the City was during the 4th cycle planning period (2007-2014). As required, the 4th cycle housing element was reviewed by the California Department of Housing and Community Development (HCD, 2023) but was not ultimately certified by HCD. Blue Lake prepared a draft update for the 5th cycle (2014-2019), which was reviewed by HCD but was not ultimately adopted by the City Council or certified by HCD. The proposed 2019-2027 Housing Element Update will replace the adopted 4th cycle housing element. The Housing Element Update identifies the potential for development of up to 89 new housing units at full buildout of the city's existing vacant lot inventory. **Figure 3** shows the location of the vacant lots in the City that are zoned to allow residential development. The projected number of units only considered development of existing vacant lots under current land use designations and zoning. Although a discussion of the residential development capacity of underutilized lots in the City is included in the Housing Element Update, this additional capacity was not used to determine whether the City has adequate sites to meet its share of the regional housing need for the 5th and 6th planning cycles.

The proposed project ("project") consists of a comprehensive update to the Housing Element of the City of Blue Lake General Plan for the 6th cycle planning period, which runs from December 31, 2018 to August 31, 2027. State law requires that housing elements be updated every eight years (California Government Code Sections 65580 to 65589.8). The Housing Element Update identifies residential sites adequate to accommodate a variety of housing types for all income levels and needs of special population groups, defined under state law (California Government Code Section 65583). It analyzes governmental constraints to housing maintenance, improvement, and development; addresses conservation and improvement of the condition of existing affordable housing stock; and outlines policies that promote housing opportunities for all persons. The Housing Element Update, pursuant to AB 686, identifies and analyzes impediments to fair housing by way of outreach, assessment of fair housing, site inventory, identification and prioritization of contributing factors, and goals and assessment.



City of Blue Lake Housing Element Update Blue Lake, California		Vacant Parcels with Residential & Mixed Use Zoning SHN 021022.001
February 2022	Figure3_VacantParcelsRZone	Figure 3

The Housing Element Update is a policy document that does not result in physical changes to the environment but encourages the provision of housing. While policies could require amendments to the Zoning Code or result in actions of the City that could cause a physical change, the policies would not result in specific physical changes to the environment. Additionally, most projects that may occur in the future as a result of any amendments to the Zoning Code, would be subject to project-specific environmental review once a complete development application is received by the City.

As outlined below under the discussion of the 6th Cycle Housing Goals, Policies, and Implementation Programs, the proposed project would involve amending the City's Zoning Code for the following reasons:

- To ensure consistency with state regulations related to accessory dwelling units, manufactured housing/mobile homes, single room occupancy units, transitional and supportive housing, emergency shelters, employee housing, density bonuses, reasonable accommodation, and residential care facilities (see Implementation Program HI-1).
- To create a Multi-Family Combining Zone to allow multi-family projects without discretionary review or by-right at a density of 16 units per acre or 1 unit per 2,722.5 square feet of lot area (see Implementation Program HI-14). Due to the availability of adequate sites with limited constraints within the City where the combining zone could be applied, during the 6th cycle planning period, the combining zone is anticipated to be applied to a property in the City's Powers Creek District that is zoned Opportunity (O) and already allows for residential development. To meet the requirement for by-right zoning in Government Code Section 65583.2, subdivisions (h) and (i), the property would need to be sufficiently sized to allow a capacity of at least 11 units, which would be a minimum of 27,500 square feet (~0.63-acres) at the residential density allowed in the O zone (1 unit per 2,500 square feet of lot area). As described below, 11 units is the Regional Housing Needs Assessment (RHNA) allocation carry over from the 5th cycle planning period (see **Table 1**). Any by-right project proposed on a property that the combining zone has been applied to would not be subject to CEQA. Because the City did not have a housing element that was adopted and certified in the 5th cycle, HCD has determined that the City must complete Implementation Program HI-14 prior to receiving certification of its 6th cycle Housing Element Update.
- To remove potential constraints to the development of multi-family housing, the City will amend development standards in the Planned Development Residential (PD-R), Residential Two-Family (R-2), and Mixed-Use (MU) zones to ensure they are consistent with other zones allowing multi-family housing in the City (see Implementation Program HI-19). Development standards that would be amended in these zones include maximum ground coverage, maximum building height, and setbacks.
- To comply with the requirements for objective design standards in Government Code Section 65589.5, subdivision (f), the City will replace the subjective review criteria for the Site Plan Approval

process (such as, “Principles to Be Followed” in Zoning Code Section 17.24.250(F)) with objective standards (see Implementation Program HI-21). Objective standards are defined as those that involve no personal or subjective judgment by a public official and being uniformly verifiable by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant or proponent and the public official reviewing the project.

- To minimize the potential for confusion regarding the applicability of the City’s design guidelines, the City will amend all zones that reference the guidelines (for example, MU, RC, etc.) to make it clear that they are recommendations and not enforceable standards of the Zoning Code (see Implementation Program HI-22).

This Initial Study/Negative Declaration (IS-ND) serves as the environmental review of the proposed project, as required by the California Environmental Quality Act (CEQA), Public Resources Code Section 21000 et seq., and the State CEQA Guidelines.

Regional Housing Needs Allocation Process

State Housing Element law requires local jurisdictions to update their Housing Elements at least once every eight years in response to the eight-year RHNA process. The RHNA process defines each local jurisdiction’s share of the region’s projected housing needs, by income category, for the planning period. State law mandates that jurisdictions provide sufficient land to accommodate a variety of housing opportunities for all economic segments of the community. Compliance with this requirement is measured by the jurisdiction’s ability to identify adequate sites to accommodate the RHNA. Humboldt County is required to adopt a Regional Housing Needs Plan (RHNP) that allocates a share of the County’s housing need to all the cities in the County. The projection period for the RHNP and the planning period for the City’s Housing Element Update began December 31, 2018, and ends August 31, 2027.

As noted above, the City did not have an adopted and certified Housing Element Update for the 5th cycle planning period (2014-2019). As generally required by Government Code Section 65584.09, because the City did not have a certified Housing Element in the 5th cycle, the 2014-2019 RHNA was required to be carried over into the 6th cycle Housing Element Update (the proposed project), which covers the 2019-2027 planning period. Therefore, the City must plan for both its 5th and 6th cycle RHNA in the 6th cycle Housing Element Update. Listed in **Table 1** is the breakdown of the RHNA for the City of Blue Lake, by income group, for the 2014-2019 (5th cycle) and 2019–2027 (6th cycle) planning periods.

Table 1: Blue Lake 5th and 6th Cycle RHNA

Income Category	2014-2019 RHNA (5th Cycle)[1]	2019-2027 RHNA (6th Cycle)[2]	Total RHNA (5th & 6th Cycle)
Very Low	4	7	11
Low	1	4	5
Moderate	2	5	7
Above Moderate	4	7	11
Total	**11**	**23**	**34**

Sources:
[1]HCAOG, 2013
[2]HCAOG, 2019

Residential Land Inventory

Section 65583(a)(3) of the Government Code requires Housing Elements to contain an "inventory of land suitable for residential development, including vacant sites and sites having potential for redevelopment, and an analysis of the relationship of zoning and public facilities and services to these sites." The 2019-2027 Housing Element contains an analysis of land that is available for the development of housing within the 6th cycle planning period, including land that is currently entitled for housing which has not yet been built, vacant land, and redevelopment sites, as well as the capacity for Accessory Dwelling Units (ADUs) and Junior Accessory Dwelling Units (JADUs). The results of this analysis are shown in Table 21 and Table 22 of the Housing Element Update and are summarized in **Table 2**. **Table 2** shows that the City's residential land inventory exceeds its total 5th and 6th cycle RHNA in all income categories.

Table 2: Comparison of 5th and 6th Cycle RHNA and Residential Sites

Income Group	2014-2019 RHNA	2019–2027 RHNA	ADU/JADU Capacity	Site Capacity[1]	RHNA Surplus
Very Low	4	7	2	56	42
Low	1	4			
Moderate	2	5	2	20	15
Above Moderate	4	7	--	13	2
Total	11	23	4	89	59

Source: City of Blue Lake, 2024b.
[1]The site capacity only includes the capacity on vacant sites identified as likely developable in Table 21 of the 6th Cycle Housing Element Update.

Goals, Policies, Programs, and Objectives

Government Code, Section 65588(a)(2) "Review and Revision" requires that a newly proposed Housing Element Update review the goals, policies and programs of the previous housing element, and report on the

attainment and disposition of the programs. In some instances, the programs from the previous Housing Element are continued through to the proposed update.

Table 3 provides the implementation progress of the City's housing programs from the last Housing Element adopted by the City, which was in 2009 during the 4th cycle planning period (2007-2014). As indicated in **Table 3**, the proposed project would amend many existing programs to be more straightforward and streamlined, to provide greater consistency with current State housing law, and to reflect current conditions in the City. The proposed Goals, Policies, and Implementation Programs for the 6th cycle Housing Element Update are provided following **Table 3**.

Table 3. Implementation Progress of the City of Blue Lake's Housing Programs

2007-2014 (4th Cycle) Housing Element Programs	Implementation Status	Continue/ Modify/ Delete in 2019-2027 (6th Cycle) Housing Element
1. The City will review its 2003 Revised Second Unit Ordinance to create ways to further the appropriate construction of "second units or granny units" on single-family lots beyond the creation of the Ordinance and rezoning of lots for applicability.	During the 5th planning cycle, the City's Accessory Dwelling Unit regulations were determined by HCD to be "null and void" due the numerous inconsistencies with State regulations. Since that time, the City has deferred to current State regulations for Accessory Dwelling Units. The City has contacted HCD (adu@hcd.ca.gov) on several occasions to ask questions and receive clarification to ensure that State ADU regulations were being properly implemented in the City.	Modify. See Program HI-1.
2. The City will adopt a density bonus ordinance in accordance with Section 65915 of the Government Code. A density bonus will be granted by the City to an interested developer in exchange for a guarantee of affordable units.	During the 4th and 5th planning cycles, the City did not adopt a density bonus ordinance. The City defaults to current state regulations for density bonus requirements.	Modify. See Program HI-1.
3. The City will encourage planned developments on large parcels to facilitate the construction of a variety of housing types and densities, including multi-family for lower-income households. Financial assistance to offset part of the cost of extending public facilities will be considered by the City as an activity for inclusion in an application to the State Department of Housing & Community Development (HCD) for Community Development Block Grant (CDBG) Funds to assist in upgrading living conditions for the residents of Blue Lake.	During the 4th and 5th planning cycles, the City encouraged development on Planned Development Residential zoned parcels in the western portion of the City. Parcel 025-101-023 (~3 acres) was approved for the development of 3 single-family residences with accessory dwelling units and 2 duplexes (total of 10 units). The City did not submit any applications for CDBG funds to encourage planned development during the 4th and 5th planning cycles.	Modify. See Programs HI-5 and HI-14.

2007-2014 (4th Cycle) Housing Element Programs	Implementation Status	Continue/ Modify/ Delete in 2019-2027 (6th Cycle) Housing Element
4. The City will propose revision of the R3 Zone in the Zoning Ordinance to establish performance standards (as seen in the newly updated Industrial Zone) that would allow more of the conditionally allowable uses to be principally permitted (by-right) and including multi-family developments.	The City considered amendment of the R3 Zone to principally permit multi-family housing during the 4th and 5th planning cycles. The City ultimately decided to pursue developing a Combining Zone that, when applied to individual properties, would principally permit multi-family housing. The Combining Zone is proposed for adoption during the current planning cycle.	Modify. See Program HI-14.
5. The City will continue to apply (or support applications) to HCD and agencies for funds to provide low interest and deferred loan programs for the rehabilitation of housing occupied by targeted income households.	The City was not contacted by any qualifying households during the 4th and 5th planning cycles.	Modify. See Programs HI-4 and HI-9.
6. The City will continue participation in the Humboldt County Fair Housing Committee sponsored by the Board of Realtors.	During the 4th and 5th planning cycles, the City did not participate in the Humboldt County Fair Housing Committee.	Modify. See Program HI-10.
7. The City Clerk is designated as the contact for referral of fair housing complaints to the State Department of Fair Housing and Employment.	During the 4th and 5th planning cycles, notices were posted on several occasions at City Hall.	Modify. See Program HI-10.
8. During the effective period of this element the City will review the Zoning Ordinance and other City policies for consistency with the Fair Housing law.	During the 4th and 5th planning cycles, the City was not made aware of any inconsistencies between the Municipal Code and Fair Housing law.	Continue. See Program HI-10.
9. During the effective period of this element the City will review the Zoning Ordinance to include emergency shelters, transitional housing and group housing	During the 4th and 5th planning cycles, the City considered amending the Municipal Code to allow these uses in the Retail Commercial and Mixed-use zones in and	Modify. See Program HI-1.

2007-2014 (4th Cycle) Housing Element Programs	Implementation Status	Continue/ Modify/ Delete in 2019-2027 (6th Cycle) Housing Element
and allow them in appropriate zones if the need arises. If the need is addressed, Blue Lake will enter into a multi-jurisdictional agreement with surrounding communities to address this problem pursuant to SB 2.	around the downtown. The amendments were not ultimately adopted.	
10. During the effective period of this element the City will review the sewer and water ordinances to ensure compliance with SB 1087. If they are not in compliance, the City will update and amend the ordinances so as to facilitate housing development for lower-income families and workers.	During the 4th and 5th planning cycles, no amendments were made to ensure compliance with SB 1087.	Continue. See Program HI-16.
11. During the effective period of this element the definition of family in the Zoning Ordinance will be revised to be compliant with fair housing law.	This amendment to the Municipal Code did not occur during the 4th and 5th planning cycles.	Modify. See Program HI-1.
12. Energy conservation information for existing housing will be disseminated by publicizing available weatherization programs.	During the 5th planning cycle, the City provided information at City Hall about RCEA and RCAA weatherization programs as information was made available. City staff, RCEA, and RCAA conducted public outreach to make renters and homeowners aware of these programs. During the 5th cycle, dozens of residences in the City received weatherization improvements through these programs.	Modify. See Programs HI-3 and HI-6.
13. Rehabilitated units will be encouraged to include retrofit weatherization improvements such as ceiling and floor insulation, caulking and weather-stripping.	During the 5th planning cycle, the City provided information about weatherization programs to owners rehabilitating residential units.	Continue. See Program HI-6.

2007-2014 (4th Cycle) Housing Element Programs	Implementation Status	Continue/ Modify/ Delete in 2019-2027 (6th Cycle) Housing Element
14. New construction will be required to comply with Title 24 of the State Building Code. These requirements are approved by the City Building Department at the time of plan review or permit application.	During the 4th and 5th planning cycles, all new construction was required to comply with Title 24 requirements.	Continue. See Program HI-8.
15. The City will continue to seek methods to revitalize Downtown. The purpose will be to increase local employment opportunities and tourist spending. The City Council will meet with the Blue Lake Chamber of Commerce to discuss business opportunities and constraints.	During the 4th and 5th planning cycles, the City continued marketing the Downtown including seeking grant funding to acquire a property for development of a plaza and a portion of the Annie and Mary Trail.	Delete.
16. A capital improvement program will be prepared. Financial assistance will be sought to implement identified strategies from the State Economic Development Set-Aside and HUD's Urban Development Action Grant Program.	During the 4th and 5th planning cycles, components of a capital improvement program were prepared. The City sought funding through sources other than those identified in this program.	Delete.
17. Large homes suitable for bed and breakfast are encouraged to convert to this use as part of the tourism effort.	During the 4th and 5th planning cycle, the City did not encourage owners of large homes to convert them to bed and breakfast businesses. Instead, the City encouraged owners of large homes to convert them to multiple long-term rental units.	Delete.
18. Increased local employment opportunities should be pursued through development of small business start-up opportunities and designation of suitable area for development. Financial assistance should be pursued.	During the 4th and 5th planning cycles, the City did encourage the development of small businesses and pursued financial assistance through sources other than those identified in this program.	Delete.

2007-2014 (4th Cycle) Housing Element Programs	Implementation Status	Continue/ Modify/ Delete in 2019-2027 (6th Cycle) Housing Element
19. Feasibility for group quarter opportunities for targeted groups (single persons, female-headed households, disabled, seniors, etc.) will be researched and implemented if a need or interest is identified. Once a need or interest is identified and program funds are available, the City will apply for HCD's Family Housing Demonstration Program (FHDP).	The City was contacted by one developer interested in developing senior housing on APN 025-101-023 during the 5th planning cycle. The project ultimately did not move forward because the developer determined that the lot constraints would not allow for a viable project. The lot constraints included an irregular lot shape, a drainage easement along the northern property boundary, and a large area of wetlands in the middle portion of the site. As discussed under Program 3, APN 025-101-023 (~3 acres) was ultimately approved for the development of 3 single-family residences with accessory dwelling units and 2 duplexes (total of 10 units).	Modify. See Program HI-5.
20. Senior Group Housing Opportunities should be pursued. The City will submit at least one application to HCD, at time a Request for Proposal is distributed, for Senior Citizen Shared Housing Program (SCSHP).	The City was contacted by one developer interested in developing senior housing on APN 025-101-023 during the 5th planning cycle. The project ultimately did not move forward because the developer determined that the lot constraints would not allow for a viable project. The lot constraints included an irregular lot shape, a drainage easement along the northern property boundary, and a large area of wetlands in the middle portion of the site. As discussed under Program 3, APN 025-101-023 (~3 acres) was ultimately approved for the development of three single-family residences with accessory dwelling units and two duplexes (total of 10 units).	Modify. See Program HI-5.
21. The City will revise the Residential-1 (R1) section of the Zoning Ordinance to address group homes (rest homes, nursing homes, etc.) of fewer than 6 persons to be consistent with State law.	This amendment to the Municipal Code did not occur during the 4th and 5th planning cycles.	Modify. See Program HI-1.

2007-2014 (4th Cycle) Housing Element Programs	Implementation Status	Continue/ Modify/ Delete in 2019-2027 (6th Cycle) Housing Element
22. The City will implement the requirements of the American Disabilities Act through the following specific actions: a) The City will provide a process for requesting "reasonable accommodation" with respect to zoning, permit processing, building laws, and the enforcement of building codes and the issuance of building permits. Once the process for "reasonable accommodation" is developed, the City will make this information available to the public by mailing it out with the monthly water bills. b) During the effective period of this element the City will make efforts to remove any existing constraints on housing for persons with disabilities, such as accommodating procedures for the approval of group homes, ADA retrofits, and evaluation of the Zoning Code for ADA compliance or other measures that provide flexibility. c) The City will also revise Section 610 of the Zoning Ordinance to addressing off-street parking facilities to allow for parking reductions for special needs housing.	a) During the 4th and 5th planning cycles, this task was not completed, and no requests were made for reasonable accommodation. b) During the 4th and 5th planning cycle, no units were developed in the City for persons with disabilities. c) During the 5th planning cycle, the City amended the Municipal Code to allow the City Planner to waive off-street parking requirements administratively. The waiver has been used on several residential projects since its adoption and could also be used to allow parking reductions for special needs housing.	Modify. See Programs HI-1 and HI-14.

2007-2014 (4th Cycle) Housing Element Programs	Implementation Status	Continue/ Modify/ Delete in 2019-2027 (6th Cycle) Housing Element
23. The City, through local community newsletter or water billing, will publicize available programs or resources regarding the following: a) Subsidized Housing Programs. b) Shared Housing Opportunities. c) Available day care/nursery school programs. d) Permit process to become a licensed day care provider. e) Fair Housing Practices. f) Nearby Social Services. g) Housing Rehabilitation Programs, Weatherization Programs. h) Local Employment Opportunities.	Promotional materials about these programs were made available at City Hall and the Blue Lake Community Resource Center during the 4th and 5th planning cycles.	Continue. See Program HI-3.
24. The City will conduct proactive efforts to assist multi-family development for low- and moderate-income households through the following specific actions: a) Assist developers in identifying suitable sites. b) Work with USDA Rural Development to keep up with funding opportunities applicable to this type of development. Where zoned appropriately allow conversion of large historic residences	a) During the 4th and 5th planning cycles, the City assisted three developers in pursuing multi-family housing projects on suitable sites. b) During the 4th and 5th planning cycles, no eligible projects were proposed in the City. c) During the 4th and 5th planning cycles, the City continued to provide free application assistance meetings to applicants pursuing housing projects.	Modify. See Programs HI-5 and HI-14.

2007-2014 (4th Cycle) Housing Element Programs	Implementation Status	Continue/ Modify/ Delete in 2019-2027 (6th Cycle) Housing Element
into multiple units and use housing rehabilitation money for qualifying users and look for other funding opportunities. c) Continue offering pre-application meetings to assist in developmental issues and concerns.		
25. The City will pursue or provide assistance to individuals for the development of limited care facilities for seniors and/or the disabled.	The City was contacted by one developer interested in developing senior housing on APN 025-101-023 during the 5th planning cycle. The project ultimately did not move forward because the developer determined that the lot constraints would not allow for a viable project. The lot constraints included an irregular lot shape, a drainage easement along the northern property boundary, and a large area of wetlands in the middle portion of the site. As discussed under Program 3, APN 025-101-023 (~3 acres) was ultimately approved for the development of 3 single-family residences with accessory dwelling units and 2 duplexes (total of 10 units).	Modify. See Program HI-5.

Blue Lake 6th Cycle Housing Goals, Policies, and Implementation Programs

The City's goals, policies, and implementation programs in the 2019-2027 Housing Element Update are listed below and are intended to accomplish the broad State housing goals and requirements as appropriate for Blue Lake's particular needs and circumstances. **Table 4** summarizes the potential environmental impacts that could occur as a result of the updated policies and implementation programs in the 6th cycle Housing Element Update. A more detailed analysis of potential environmental impacts of the proposed project is provided in Section 4 – Environmental Factors Potentially Affected.

Goal HG-1: Assure adequate, safe, cost-effective and energy efficient housing opportunities for all segments of the community, while maintaining the quality living environment and rural character of Blue Lake by planning for and enabling the development of balanced residential neighborhoods with access to affordable housing, community facilities, and public services.

Community Housing Policies

HP-1.1 Review all new residential development to be consistent with the existing small-town character of the community and blend with existing development, as well as to ensure sustainability and environmental protection.

HP-1.2 Encourage multi-family developments on larger lots (>1 acre) in the Mixed-Use (MU), Opportunity (O), and Planned Development Residential (PDR) zones.

HP-1.3 Revise the Municipal Code to allow manufactured housing to be permitted on sites where single-family dwellings would otherwise be allowed.

HP-1.4 Promote conservation and improvement of the existing housing stock, with emphasis on older structures. Specific areas of concern include energy efficiency, electrical wiring, foundation stability, and prevention of water damage.

HP-1.5 Encourage the use of private-initiated and / or publicly-funded programs to provide housing for low- and moderate-income families, and pursue as feasible, appropriate, and applicable, local, State, and Federal housing and economic development programs. As pertinent information becomes available, develop a program for notifying residents of the availability of housing programs and funding.

HP-1.6 Preserve the City's more affordable housing stock along with historical and cultural heritage through preservation and innovative reuse of older structures.

HP-1.7 Encourage citizen involvement in property maintenance and efforts to improve the housing stock and overall neighborhood quality.

Goal HG-2: Provide for adequate housing for persons with special housing needs such as target income groups of low-income, the elderly, handicapped, and female-headed households.

Special Needs Housing Policies

HP-2.1 Discrimination in housing based on race, color, religion, sex, family size, marital status, national origin, ancestry, or other arbitrary factors is not permitted. Support appropriate safeguards to ensure fair housing opportunities.

HP-2.2 Encourage provisions for access for the handicapped in new or rehabilitated residential and commercial developments by considering exceptions or revisions to City ordinances allowing more flexibility relating to zoning, density, reduced setbacks or other incentives to provide reasonable accommodation or improve living conditions of residents.

HP-2.3 Encourage the County to allow a variety of housing types in the residential areas surrounding the City. Consider entering into a multi-jurisdictional agreement to provide housing and/or shelter for homeless persons.

HP-2.4 Encourage new residential development in Blue Lake to specifically address the needs of seniors, including projects that have smaller yards, low-maintenance landscaping, limited mobility fixtures, and appropriately sized parking spaces.

Implementation Programs

HI-1 Amend the Zoning Code to address the following:

- **Accessory Dwelling Units (ADUs).** Allow Accessory Dwelling Units (ADU) in accordance with current State law for ADUs, Assembly Bill 2299 and Senate Bill 1069. Consider adopting a Junior Accessory Dwelling Unit (JADU) ordinance to allow for a simple and affordable housing option. To ensure the City's ADU standards are compliant with State law and remain compliant in perpetuity, the City will amend the Municipal Code to cite/reference State law for ADUs. The amendment to the Municipal Code will be provided to HCD for review and recommendation if any changes are required to achieve compliance.
- **Manufactured housing/Mobile homes**. Allow manufactured housing and mobile homes in the same manner and in the same zones as conventional or stick-built structures are permitted (Government Code Section 65852.3). This includes, but is not limited to, allowing manufactured homes on a permanent foundation as a single-family use.
- **Single Room Occupancy Units (SROs).** Define and allow principally permitted in the Residential Multiple-Family (R-3), Mixed-Use (MU), Opportunity (O), and Planned Development Residential (PDR) zones.
- **Transitional and Supportive Housing.** Define transitional and supportive housing. Permit transitional and supportive housing in all zones allowing residential uses subject to only the same restrictions on residential uses contained in the same type of structure. In addition, transitional and supportive housing will be allowed as a permitted use, without discretionary review, in zones where multi-family and mixed uses are permitted, including nonresidential zones permitting multi-family uses.

- **Emergency Shelters.** Allow by-right, without discretionary review, in a zoning district with sufficient capacity to accommodate the identified need for shelters (for example, Opportunity zone).
- **Employee Housing.** Comply with the State Employee Housing Act (Health and Safety Code Sections 17021.5 and 17021.6). This includes the following amendments: 1) amendment of the Zoning Code to allow agricultural employee housing for 6 or fewer persons by-right in the Residential One-Family (R-1) zoning district, subject to the same regulations as a single-family dwelling; 2) amendment of the Zoning Code to allow agriculture employee housing of no more than 12 units or 36 beds as a by-right agricultural use in the Agricultural Exclusive (AE) zoning district; and 3) amendment of the definition of "Farm Dwelling" in the Zoning Code to be consistent with Health and Safety Code Section 17026.1.
- **Density Bonus.** Comply with state density bonus law (Government Code [GC] Section 65915, as revised). Promote the density bonus through informational brochures, which will be displayed at City Hall.
- **Reasonable Accommodation.** Develop and formalize a process that a person with disabilities will need to go through to make a reasonable accommodation request in order to accommodate the needs of persons with disabilities and streamline the permit review process. The City will provide information to individuals with disabilities regarding reasonable accommodation policies, practices, and procedures based on the guidelines from HCD. This information will be available through postings and pamphlets at the City and on the City's website.
- **Residential Care Facilities.** Allow for residential care homes with six or fewer persons by-right in all residential zones subject only to the same restrictions applicable to other residential uses in that zone. Allow larger group homes of seven or more persons in all zones allowing residential uses and revise zoning and permit procedures with objective standards and procedures to facilitate approval certainty and subject only to the same restrictions applicable to other residential uses in that zone. Additionally, the City will amend the Zoning Code to update its definition of "family" to be "One or more persons living together in a dwelling unit."

Responsibility: City Council, Planning Commission, and Planning Staff.

Time Frame: Amend the Zoning Code by December 2024. The Zoning Code amendment related to emergency shelters will be completed prior to adoption of the Housing Element.

Funding Source: General Fund and/or Grants.

HI-2 AB 101 (2019), review the City's Zoning Code and make revisions if necessary, to allow low barrier navigation centers for the homeless per Government Code 65660-65668.

Responsibility: City Council, Planning Commission, and Planning Staff.

Time Frame: Review zoning in 2023. Make any necessary revisions December 2024.

Funding Source: General Fund.

HI-3 As resources are available, publicize available programs regarding the following topics through a local community newsletter or water billing:

- Subsidized Housing Programs
- Shared Housing Opportunities
- Available day care/nursery school programs
- Permit process to become a licensed day care provider
- Available adult day care program
- Fair Housing Practices
- Nearby Social Services
- Housing Rehabilitation Programs, Weatherization Programs
- Local Employment Opportunities

Responsibility: City Council and City Clerk.

Time Frame: Ongoing, as programs are available. Programs will be publicized quarterly, at a minimum.

Funding Source: General Fund.

HI-4 As Notices of Funding Available (NOFAs) are released, apply for available grant funding through the CalHome program to assist individual first-time homebuyers through deferred-payment loans for down payment assistance, home rehabilitation, including manufactured homes not on permanent foundations, acquisition and rehabilitation, homebuyer counseling, self-help mortgage assistance, or technical assistance for self-help homeownership.

Responsibility: City Council, Planning Commission, and Planning Staff.

Time Frame: Annually apply as NOFAs are released.

Funding Source: CalHome and other available funding sources.

HI-5 To encourage development of housing for lower- income households including, extremely low-income, and special needs households such as, people experiencing homelessness, senior, single parent, and disabled households, the City is proposing the following activities: 1) work with local non-profits on a variety of activities, such as conducting outreach to housing developers on an annual basis; providing financial assistance (when feasible), or in-kind technical assistance; 2) providing expedited processing; 3) identifying grant and funding opportunities; 4) applying for or supporting applications for funding on an ongoing basis; 5) reviewing and prioritizing local funding at least twice in the planning period; and/or 6) offering additional incentives beyond the density bonus.

In addition, support the rehabilitation of suitable structures to single room occupancy units by providing available grant funding or other financial assistance opportunities when projects are brought to the City.

Responsible Agencies: City Council, Planning Commission, and Planning Staff.

Timeframe: Annual outreach to developers, prioritize local funding at least twice in the planning period, and support expediting applications on an ongoing basis.

Funding Source: General Fund, CDBG Funds.

HI-6 Encourage new and rehabilitated units to include weatherization improvements such as ceiling and floor insulation, caulking, and weather-stripping, and disseminate energy conservation information for existing housing by publicizing and / or providing information regarding energy audit and weatherization programs, such as those through the Redwood Coast Energy Authority, PG&E, and Energy Upgrade California™, as they become available.

Responsibility: City Council, Planning Commission, and Building Official.

Time Frame: Ongoing; as projects are processed, and program informational materials are made available.

Funding Source: General Fund.

HI-7 If applicable, the City will establish a written policy or procedure and other guidance as appropriate to specify the SB 35 streamlining approval process and standards for eligible projects, as set forth under GC Section 65913.4.

Responsibility: City Council, Planning Commission, and Planning Staff.

Time Frame: Annually review and, if applicable, develop an SB 35 streamlining approval process within one-year of determining that SB 35 applies to sites within the City.

Funding Source: General Fund and/or Grants.

HI-8 Continue to require all projects to comply with the current version of Title 24 of the California Building Standards Code.

Responsibility: City Building Department.

Time Frame: Ongoing, as projects are processed.

Funding Source: General Fund.

HI-9 The City will conduct a survey of the existing housing stock as an initial step for determining the housing rehabilitation needs in city limits. Once the survey is completed, the City will coordinate with the County of Humboldt on directing available funding to property owners in targeted income groups. Because the City does not have the resources to administer a housing rehabilitation program, the County of Humboldt is currently the agency that is assisting residents in city limits with obtaining housing rehabilitation funding.

Responsibility: City Council and City Staff.

Time Frame: Complete the housing conditions survey of the existing housing stock in the City by December 2023. Beginning in the first quarter of 2024, coordinate on a quarterly basis with the County of Humboldt during the planning period.

Funding Source: General Fund.

HI-10 Develop a plan to Affirmatively Further Fair Housing (AFFH). The AFFH Plan shall take actions to address significant disparities in housing needs and in access to opportunity for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 [commencing with Section 12900] of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law.

Specific actions could include but are not limited to:

- Provide dedicated staff that investigates fair housing complaints and enforces fair housing laws.
- Facilitate public education and outreach by creating informational flyers on fair housing that will be made available at public counters, libraries, and on the City's website. City Council meetings will include a fair housing presentation at least once per year.
- Actively recruit residents from neighborhoods of concentrated poverty to serve or participate on boards, committees, and other local government bodies.
- Develop a proactive code enforcement program that holds property owners accountable.
- Provide education to the community on the importance of completing Census questionnaires.
- Review the Zoning Code and other City codes and policies for consistency with the fair housing law.

Responsibility: City Council, Planning Commission, and Planning Staff.

Time Frame: Create Plan within three years of adoption of the Housing Element, and implement on an ongoing basis.

Funding Source: General Fund and/or Grants.

HI-11 The City will continue to encourage appropriately licensed/permitted cottage or home-base industries, including those related to recreation/tourism to the area, to a reasonable extent, in efforts to bolster the City's economy, promote affordable housing, and increase employment opportunities by implementing the following actions:

- Permit at least one (1) licensed day care or nursery school operation where appropriate
- Increase tourism revenues by promoting community events
- Increase opportunities for development of cottage industries / home occupations that are compatible with neighborhood character and environmental constraints
- Permit appropriate and necessary ancillary services to the recreational fishing industry

Responsibility: City Council, City Clerk, and Planning Staff.

Time Frame: As feasible, hold annual meetings between the City Council, Economic Development Commission, and Business Community.

Funding Source: General Fund.

HI-12 Work with the Redwood Coast Regional Center (RCRC) to implement an outreach program that informs families in the city about housing and services available for persons with developmental disabilities. The program could include developing an informational brochure and directing people to service information on RCRC's website (https://redwoodcoastrc.org/for-clients/our-services/).

Responsibility: City Council, City Clerk, and Planning Staff.

Time Frame: Develop an outreach program within two years of adopting the Housing Element to assist persons with development disabilities. Once the outreach program is developed, outreach is proposed to occur on a quarterly basis.

Funding Source: General Fund and/or Grants.

HI-13 To ensure that assisted affordable housing remains affordable, the City will monitor the status of all affordable housing projects and, as their funding sources near expiration, will work with owners and other agencies to consider options to preserve such units. The City will also provide technical support to property owners and tenants regarding proper procedures relating to noticing and options for preservation.

Responsibility: City Council, City Clerk, and Planning Staff.

Time Frame: Ongoing, as projects approach expiration.

Funding Source: General Fund and/or Grants.

HI-14 To ensure that the use permit process for multi-family projects does not impact the timing, cost, or supply of multi-family development, the City will adopt and apply a Combining Zone to sites in the Residential Multiple-Family (R-3), Mixed-use (MU), Opportunity (O), and/or Planned Development Residential (PDR) zones to allow multi-family residential uses by-right at a density of 16 units per acre.

Responsibility: City Council, City Clerk, and Planning Staff.

Time Frame: Adopt the Combining Zone and apply to sites zoned Residential Multiple-Family (R-3), Mixed-use (MU), Opportunity (O), and/or Planned Development Residential (PDR) to allow multi-family residential uses by-right by December 2024. Capacity for at least 11 units (5th cycle RHNA) will meet all by-right requirements pursuant to Government Code Section 65583.2, subdivisions (h) and (i).

Funding Source: General Fund and/or Grants.

HI-15 The City will review the City's Safety and Conservation Elements and any other General Plan Elements, as required, and ensure compliance with new State Law.

In addition, the city will bi-annually review the effectiveness of the programs in the Housing Element and make revisions as appropriate, including monitoring the effectiveness of programs to accommodate the regional housing need. If programs are not effective in making progress toward the regional housing need, the city will immediately revise strategies and amend the housing element for HCD review.

Responsibility: City Council, City Clerk, and Planning Staff.

Time Frame: Review in 2023, revise as necessary within three years of adoption of the Housing Element. Monitor the Housing Element programs annually and submit to HCD by April 1 each year.

Funding Source: General Fund and/or Grants.

HI-16 To comply with SB 1087, the City as the water and sewer provider, will set up a process to grant priority for water and sewer service allocations to proposed developments that include units affordable to lower-income households.

Responsibility: City Council, City Clerk, and Planning Staff.

Time Frame: Set up a process by December 2024; ongoing as projects are processed.

Funding Source: General Fund and/or Grants.

HI-17 As required by the Annual Progress Report process, the City will monitor the production and affordability of Accessory Dwelling Units (ADUs) and Junior Accessory Dwelling Units (JADUs) during

the planning period. If ADU production does not meet the projections in the Housing Element, additional actions will be taken in consultation with HCD. The additional actions could include but are not limited to 1) conducting outreach to inform the public about current State law for ADUs and the benefits of ADU development; 2) amending the Municipal Code to incorporate ADU standards that are more permissive than current State law; or 3) rezoning sites in the City that have non-residential zoning to zones allowing residential development.

Responsibility: Planning Staff and Building Official.

Time Frame: ADU production and affordability will be monitored annually throughout the planning period. If additional actions need to be taken due to lack of ADU production, those actions will be taken within one-year of the City determining that the projections in the Housing Element are not being met.

Funding Source: General Fund and/or Grants.

HI-18 To address the potential for insufficient wastewater treatment capacity during a portion of the planning period, the City shall construct the wastewater treatment plant improvements identified in its Capital Improvement Plan within two years of adopting the Housing Element. These improvements include electrical panel upgrades and the installation of aerators, which are estimated to provide an additional 180 residential equivalent units (REUs).

Responsibility: City Council, City Manager, Public Works Department, and City Engineer.

Time Frame: The improvements to the wastewater treatment plant will be completed within two years of adoption of the Housing Element.

Funding Source: Wastewater Enterprise Fund, Development Impact Fees, and/or Grant Funding.

HI-19 To remove potential constraints to the development of multi-family housing, the City shall amend the following development standards in the Zoning Code:

- Zoning Code Section 17.16.080(C)(1)(b) requires a maximum ground coverage standard of 40 percent for the Planned Development Residential (PD-R) zone. This section shall be amended to allow a maximum ground coverage of 60 percent, which is the same as several other zones in the City allowing multi-family housing (for example, R-2, R-3, and MU zones).
- Zoning Code Section 17.16.080(C)(1)(a) requires a maximum building height standard of 30 feet for all other structures, which includes multi-family housing. This section shall be amended to allow a maximum building height of 35 feet for all structures, which is the standard required for single-family structures in the Planned Development Residential (PD-R) zone.
- Zoning Code Section 17.16.080(C)(1)(c) requires the following setbacks for all other structures, which includes multi-family housing: Front – 25 feet, Side – 10 feet, Rear – 25 feet. This section shall be amended to allow the following setbacks for multi-family structures: Front – 15 feet,

Side – 5 feet, and Rear – 20 percent of lot depth to a maximum of 20 feet. This amendment would make the PD-R zone setbacks for multi-family housing more consistent with other zones allowing multi-family housing in the City.

- Zoning Code Sections 17.16.040(C)(5) and 17.16.110(D)(4) require the following maximum building height standard, "*35 feet, not exceeding two stories*." These sections of the Residential Two-Family (R-2) and Mixed-Use (MU) zones shall be amended to remove the limitation on the number of building stories. This amendment would make the R-2 and MU building height standards more consistent with other zones allowing multi-family housing in the City.

Responsibility: City Council, Planning Commission, and Planning Staff.

Time Frame: Amend the Zoning Code by December 2024.

Funding Source: General Fund and/or Grants.

HI-20 To comply with the transparency requirements in Government Code Section 65940.1(a)(1), the City shall upload the following documents to the City of Blue Lake website so they are readily available for public review: 1) schedule of fees; 2) zoning map; 3) list of information required for a complete development application; 4) current and five previous annual fee reports or the current and five previous annual financial reports; and 5) an archive of impact fee nexus studies, cost of service studies, or equivalent.

Responsibility: City Council, City Manager, City Staff.

Time Frame: The required documents will be uploaded to the City's website within one-year of the adoption of the Housing Element.

Funding Source: General Fund and/or Grants.

HI-21 To comply with the requirements for objective standards in Government Code Section 65589.5, subdivision (f), the City shall replace the subjective review criteria for the Site Plan Approval process (such as, "Principles to Be Followed" in Zoning Code Section 17.24.250(F)) with objective standards. Objective standards are defined as those that involve no personal or subjective judgment by a public official and being uniformly verifiable by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant or proponent and the public official reviewing the project.

Responsibility: City Council, City Manager, and City Staff.

Time Frame: Amend the Zoning Code by December 2024.

Funding Source: General Fund and/or Grants.

HI-22 To minimize the potential for confusion regarding the applicability of the City's design guidelines, the City shall amend all zones that reference the guidelines (for example, MU, RC, etc.) to make it clear that they are recommendations and not enforceable standards of the Zoning Code.

Responsibility: City Council, City Manager, and City Staff.

Time Frame: Amend the Zoning Code by December 2024.

Funding Source: General Fund and/or Grants.

HI-23 To ensure housing development in the City is occurring at the projected densities consistent with the income categories anticipated, the City will annually review building development on the vacant and likely developable sites included in the sites inventory of this element. If the annual review shows that sites are not providing sufficient opportunities for housing affordable to lower-income households, the City will review its Zoning Code to consider other measures, including the adoption of incentives or regulatory mechanisms to encourage construction at the mid-point or higher end of the density range. These measures could include but are not limited to: 1) requiring a minimum residential density; and 2) density bonuses (such as, specifying development standards that may be modified to make units more affordable – reduced lot sizes, increased ground coverage, etc.).

Responsibility: City Council, City Manager, and City Staff.

Time Frame: Housing production and affordability will be monitored annually throughout the planning period. If additional actions need to be taken due to the lack of housing production, those actions will be taken within one-year of the City determining that the sites are not providing sufficient opportunities for housing affordable to lower-income households.

Funding Source: General Fund and/or Grants.

Table 4. Potential Environmental Effects from Updated Policies and Programs

POLICIES		Potential for Environmental Effects
HP-1.1	Review all new residential development to be consistent with the existing small-town character of the community and blend with existing development, as well as to ensure sustainability and environmental protection.	None. No physical change to the environment would occur.
HP-1.2	Encourage multi-family developments on larger lots (>1 acre) in the Mixed-Use (MU), Opportunity (O), and Planned Development Residential (PDR) zones.	None. This policy would not allow new housing in areas that are not designated for multi-family residential development.
HP-1.3	Revise the Municipal Code to allow manufactured housing to be permitted on sites where single-family dwellings would otherwise be allowed.	None. This policy would not allow new housing in areas that are not designated for residential development.
HP-1.4	Promote conservation and improvement of the existing housing stock, with emphasis on older structures. Specific areas of concern include energy efficiency, electrical wiring, foundation stability, and prevention of water damage.	None. No physical change to the environment would occur.
HP-1.5	Encourage the use of private-initiated and / or publicly-funded programs to provide housing for low-and moderate-income families, and pursue as feasible, appropriate, applicable local, State, and Federal housing and economic development programs. As pertinent information becomes available, develop a program for notifying residents of the availability of housing programs and funding.	None. No physical change to the environment would occur.
HP-1.6	Preserve the City's more affordable housing stock along with historical and cultural heritage through preservation and innovative reuse of older structures.	None. This policy would not allow new housing in areas that are not designated for residential development.
HP-1.7	Encourage citizen involvement in property maintenance and efforts to improve the housing stock and overall neighborhood quality.	None. This policy would not allow new housing in areas that are not designated for residential development.
HP-2.1	Discrimination in housing based on race, color, religion, sex, family size, marital status, national origin, ancestry, or other arbitrary factors is not permitted. Support appropriate safeguards to ensure fair housing opportunities.	None. No physical change to the environment would occur.
HP-2.2	Encourage provisions for access for the handicapped in new or rehabilitated residential and commercial developments by considering	None. This policy would not allow new housing in areas that are not

POLICIES		Potential for Environmental Effects
	exceptions or revisions to City ordinances allowing more flexibility relating to zoning, density, reduced setbacks or other incentives to provide reasonable accommodation or improve living conditions of residents.	designated for residential development.
HP-2.3	Encourage the County to allow a variety of housing types in the residential areas surrounding the City. Consider entering into a multi-jurisdictional agreement to provide housing and/or shelter for homeless persons.	None. This policy would not allow new housing in areas that are not designated for residential development.
HP-2.4	Encourage new residential development in Blue Lake to specifically address the needs of seniors, including projects that have smaller yards, low-maintenance landscaping, limited mobility fixtures, and appropriately sized parking spaces.	None. This policy would not allow new housing in areas that are not designated for residential development.
IMPLEMENTATION PROGRAMS		**Potential for Environmental Effects**
HI-1	Amend the Zoning Code to address the following: – **Accessory Dwelling Units (ADUs).** Allow Accessory Dwelling Units (ADU) in accordance with current State law for ADUs, Assembly Bill 2299 and Senate Bill 1069. Consider adopting a Junior Accessory Dwelling Unit (JADU) ordinance to allow for a simple and affordable housing option. To ensure the City's ADU standards are compliant with State law and remain compliant in perpetuity, the City will amend the Municipal Code to cite/reference State law for ADUs. The amendment to the Municipal Code will be provided to HCD for review and recommendation if any changes are required to achieve compliance. – **Manufactured housing/Mobile homes**. Allow manufactured housing and mobile homes in the same manner and in the same zones as conventional or stick-built structures are permitted (Government Code Section 65852.3). This includes, but is not limited to, allowing manufactured homes on a permanent foundation as a single-family use. – **Single Room Occupancy Units (SROs).** Define and allow principally permitted in the Residential Multiple-Family (R-3), Mixed-Use	None. Required amendments to the City's Zoning Code would not result in a physical change to the environment. Future development would comply with General Plan density limits, the development standards for the applicable zoning district, and State law.

POLICIES		Potential for Environmental Effects
	(MU), Opportunity (O), and Planned Development Residential (PDR) zones. – **Transitional and Supportive Housing.** Define transitional and supportive housing. Permit transitional and supportive housing in all zones allowing residential uses subject to only the same restrictions on residential uses contained in the same type of structure. In addition, transitional and supportive housing will be allowed as a permitted use, without discretionary review, in zones where multi-family and mixed uses are permitted, including nonresidential zones permitting multi-family uses. – **Emergency Shelters.** Allow by-right, without discretionary review, in a zoning district with sufficient capacity to accommodate the identified need for shelters (for example, Opportunity zone). – **Employee Housing.** Comply with the State Employee Housing Act (Health and Safety Code Sections 17021.5 and 17021.6). This includes the following amendments: 1) amendment of the Zoning Code to allow agricultural employee housing for six or fewer persons by-right in the Residential One-Family (R-1) zoning district, subject to the same regulations as a single-family dwelling; 2) amendment of the Zoning Code to allow agriculture employee housing of no more than 12 units or 36 beds as a by-right agricultural use in the Agricultural Exclusive (AE) zoning district; and 3) amendment of the definition of "Farm Dwelling" in the Zoning Code to be consistent with Health and Safety Code Section 17026.1. – **Density Bonus.** Comply with state density bonus law (Government Code [GC] Section 65915, as revised). Promote the density bonus through informational brochures, which will be displayed at City Hall. – **Reasonable Accommodation.** Develop and formalize a process that a person with disabilities will need to go through to make a	

POLICIES		Potential for Environmental Effects
	reasonable accommodation request in order to accommodate the needs of persons with disabilities and streamline the permit review process. The City will provide information to individuals with disabilities regarding reasonable accommodation policies, practices, and procedures based on the guidelines from HCD. This information will be available through postings and pamphlets at the City and on the City's website. – **Residential Care Facilities.** Allow for residential care homes with six or fewer persons by-right in all residential zones subject only to the same restrictions applicable to other residential uses in that zone. Allow larger group homes of seven or more persons in all zones allowing residential uses and revise zoning and permit procedures with objective standards and procedures to facilitate approval certainty and subject only to the same restrictions applicable to other residential uses in that zone. Additionally, the City will amend the Zoning Code to update its definition of "family" to be "One or more persons living together in a dwelling unit."	
HI-2	AB 101 (2019), review the City's Zoning Code and make revisions if necessary, to allow low barrier navigation centers for the homeless per Government Code 65660-65668.	None. Required amendments to the City's Zoning Code would not result in a physical change to the environment. Future development would comply with General Plan density limits, the development standards for the applicable zoning district, and State law.
HI-3	As resources are available, publicize available programs regarding the following topics through a local community newsletter or water billing: – Subsidized Housing Programs – Shared Housing Opportunities – Available day care/nursery school programs – Permit process to become a licensed day care provider – Available adult day care program	None. No physical change to the environment would occur.

POLICIES		Potential for Environmental Effects
	– Fair Housing Practices – Nearby Social Services – Housing Rehabilitation Programs, Weatherization Programs – Local Employment Opportunities	
HI-4	As Notices of Funding Available (NOFAs) are released, apply for available grant funding through the CalHome program to assist individual first-time homebuyers through deferred-payment loans for down payment assistance, home rehabilitation, including manufactured homes not on permanent foundations, acquisition and rehabilitation, homebuyer counseling, self-help mortgage assistance, or technical assistance for self-help homeownership.	None. No physical change to the environment would occur.
HI-5	To encourage development of housing for lower-income households including, extremely low-income, and special needs households such as, people experiencing homelessness, senior, single parent, and disabled households, the City is proposing the following activities: 1) work with local non-profits on a variety of activities, such as conducting outreach to housing developers on an annual basis; providing financial assistance (when feasible), or in-kind technical assistance; 2) providing expedited processing; 3) identifying grant and funding opportunities; 4) applying for or supporting applications for funding on an ongoing basis; 5) reviewing and prioritizing local funding at least twice in the planning period; and/or 6) offering additional incentives beyond the density bonus. In addition, support the rehabilitation of suitable structures to single room occupancy units by providing available grant funding or other financial assistance opportunities when projects are brought to the City.	None. This program would not allow new housing in areas that are not designated for residential development.
HI-6	Encourage new and rehabilitated units to include weatherization improvements such as ceiling and floor insulation, caulking, and weather-stripping, and disseminate energy conservation information for existing housing by publicizing and / or providing information regarding energy audit and	None. This program would have a beneficial effect by promoting energy conservation and potentially reducing energy use by residential development in the City.

POLICIES		Potential for Environmental Effects
	weatherization programs, such as those through the Redwood Coast Energy Authority, PG&E, and Energy Upgrade California™, as they become available.	
HI-7	If applicable, the City will establish a written policy or procedure and other guidance as appropriate to specify the SB 35 streamlining approval process and standards for eligible projects, as set forth under GC Section 65913.4.	None. Required amendments to the City's Zoning Code would not result in a physical change to the environment. Future development would comply with General Plan density limits, the development standards for the applicable zoning district, and State law.
HI-8	Continue to require all projects to comply with the current version of Title 24 of the California Building Standards Code.	None. No physical change to the environment would occur.
HI-9	The City will conduct a survey of the existing housing stock as an initial step for determining the housing rehabilitation needs in city limits. Once the survey is completed, the City will coordinate with the County of Humboldt on directing available funding to property owners in targeted income groups. Because the City does not have the resources to administer a housing rehabilitation program, the County of Humboldt is currently the agency that is assisting residents in city limits with obtaining housing rehabilitation funding.	None. This program would not allow new housing in areas that are not designated for residential development.
HI-10	Develop a plan to Affirmatively Further Fair Housing (AFFH). The AFFH Plan shall take actions to address significant disparities in housing needs and in access to opportunity for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 [commencing with Section 12900] of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law. Specific actions could include but are not limited to: – Provide dedicated staff that investigates fair housing complaints and enforces fair housing laws. – Facilitate public education and outreach by creating informational flyers on fair housing that will be made available at public counters,	None. No physical change to the environment would occur.

POLICIES		Potential for Environmental Effects
	libraries, and on the City's website. City Council meetings will include a fair housing presentation at least once per year. – Actively recruit residents from neighborhoods of concentrated poverty to serve or participate on boards, committees, and other local government bodies. – Develop a proactive code enforcement program that holds property owners accountable. – Provide education to the community on the importance of completing Census questionnaires. – Review the Zoning Code and other City codes and policies for consistency with the fair housing law.	
HI-11	The City will continue to encourage appropriately licensed/permitted cottage or home-base industries, including those related to recreation/tourism to the area, to a reasonable extent, in efforts to bolster the City's economy, promote affordable housing, and increase employment opportunities by implementing the following actions: – Permit at least one (1) licensed day care or nursery school operation where appropriate – Increase tourism revenues by promoting community events – Increase opportunities for development of cottage industries / home occupations that are compatible with neighborhood character and environmental constraints – Permit appropriate and necessary ancillary services to the recreational fishing industry	None. This program would not allow new housing in areas that are not designated for residential development.
HI-12	Work with the Redwood Coast Regional Center (RCRC) to implement an outreach program that informs families in the city about housing and services available for persons with developmental disabilities. The program could include developing an informational brochure and directing people to service information on RCRC's website	None. No physical change to the environment would occur.

POLICIES		Potential for Environmental Effects
	(https://redwoodcoastrc.org/for-clients/our-services/).	
HI-13	To ensure that assisted affordable housing remains affordable, the City will monitor the status of all affordable housing projects and, as their funding sources near expiration, will work with owners and other agencies to consider options to preserve such units. The City will also provide technical support to property owners and tenants regarding proper procedures relating to noticing and options for preservation.	None. No physical change to the environment would occur.
HI-14	To ensure that the use permit process for multi-family projects does not impact the timing, cost, or supply of multi-family development, the City will adopt and apply a combining zone to sites in the Residential Multiple-Family (R-3), Mixed-use (MU), Opportunity (O), and/or Planned Development Residential (PDR) zones to allow multi-family residential uses by-right at a density of 16 units per acre.	None. Required amendments to the City's Zoning Code would not result in a physical change to the environment. Future development would comply with General Plan density limits, the development standards for the applicable zoning district, and State law. This program would not allow new multi-family development in areas that are not designated for residential development. The adoption and application of the combining zone to property in the City would be subject to review pursuant to CEQA.
HI-15	The City will review the City's Safety and Conservation Elements and any other General Plan Elements, as required, and ensure compliance with new State Law. In addition, the city will bi-annually review the effectiveness of the programs in the Housing Element and make revisions as appropriate, including monitoring the effectiveness of programs to accommodate the regional housing need. If programs are not effective in making progress toward the regional housing need, the city will immediately revise strategies and amend the housing element for HCD review.	None. This program would not allow new housing in areas that are not designated for residential development.
HI-16	To comply with SB 1087, the City as the water and sewer provider, will set up a process to grant priority for water and sewer service allocations to proposed developments that include units affordable to lower-income households.	None. This program would not allow new housing in areas that are not designated for residential development.

POLICIES		Potential for Environmental Effects
HI-17	As required by the Annual Progress Report process, the City will monitor the production and affordability of Accessory Dwelling Units (ADUs) and Junior Accessory Dwelling Units (JADUs) during the planning period. If ADU production does not meet the projections in the Housing Element, additional actions will be taken in consultation with HCD. The additional actions could include but are not limited to 1) conducting outreach to inform the public about current State law for ADUs and the benefits of ADU development; 2) amending the Municipal Code to incorporate ADU standards that are more permissive than current State law; or 3) rezoning sites in the City that have non-residential zoning to zones allowing residential development.	None. Although this program would potentially result in an amendment to the Zoning Code to encourage ADU production, new development of ADUs would not result in more severe environmental impacts than previously analyzed for the non-residential land uses (commercial or industrial) allowed in the City under the current zoning districts. Any future rezoning actions would be subject to review pursuant to CEQA.
HI-18	To address the potential for insufficient wastewater treatment capacity during a portion of the planning period, the City shall construct the wastewater treatment plant improvements identified in its Capital Improvement Plan within two years of adopting the Housing Element. These improvements include electrical panel upgrades and the installation of aerators, which are estimated to provide an additional 180 residential equivalent units (REUs).	None. The Housing Element is a policy document and does not grant any project approvals or land use entitlements. Future improvements to the City's wastewater treatment plan would be subject to review pursuant to CEQA. Mitigation measures would be incorporated as necessary to ensure that no adverse effects to the environment occur.
HI-19	To remove potential constraints to the development of multi-family housing, the City shall amend the following development standards in the Zoning Code: – Zoning Code Section 17.16.080(C)(1)(b) requires a maximum ground coverage standard of 40 percent for the Planned Development Residential (PD-R) zone. This section shall be amended to allow a maximum ground coverage of 60 percent, which is the same as several other zones in the City allowing multi-family housing (for example, R-2, R-3, and MU zones). – Zoning Code Section 17.16.080(C)(1)(a) requires a maximum building height standard of 30 feet for all other structures, which includes multi-family housing. This section shall be amended to allow a maximum building height of 35 feet for all structures, which is the standard required for single-	None. The proposed amendments to the City's Zoning Code to reduce barriers to the development of multi-family housing would not result in a physical change to the environment. The amendments would provide consistency between the City's development standards for multi-family housing in areas that are currently zoned to allow multi-family housing.

POLICIES		Potential for Environmental Effects
	family structures in the Planned Development Residential (PD-R) zone. – Zoning Code Section 17.16.080(C)(1)(c) requires the following setbacks for all other structures, which includes multi-family housing: Front – 25 feet, Side – 10 feet, Rear – 25 feet. This section shall be amended to allow the following setbacks for multi-family structures: Front – 15 feet, Side – 5 feet, and Rear – 20 percent of lot depth to a maximum of 20 feet. This amendment would make the PDR zone setbacks for multi-family housing more consistent with other zones allowing multi-family housing in the City. – Zoning Code Sections 17.16.040(C)(5) and 17.16.110(D)(4) require the following maximum building height standard, "*35 feet, not exceeding two stories*." These sections of the Residential Two-Family (R-2) and Mixed-Use (MU) zones shall be amended to remove the limitation on the number of building stories. This amendment would make the R-2 and MU building height standards more consistent with other zones allowing multi-family housing in the City.	
HI-20	To comply with the transparency requirements in Government Code Section 65940.1(a)(1), the City shall upload the following documents to the City of Blue Lake website so they are readily available for public review: 1) schedule of fees; 2) zoning map; 3) list of information required for a complete development application; 4) current and five previous annual fee reports or the current and five previous annual financial reports; and 5) an archive of impact fee nexus studies, cost of service studies, or equivalent.	None. No physical change to the environment would occur.
HI-21	To comply with the requirements for objective standards in Government Code Section 65589.5, subdivision (f), the City shall replace the subjective review criteria for the Site Plan Approval process (such as, "Principles to Be Followed" in Zoning Code Section 17.24.250(F)) with objective standards. Objective standards are defined as those that involve no personal or subjective judgment by a public official and being uniformly	None. Required amendments to the City's Zoning Code would not result in a physical change to the environment. Future development would comply with General Plan density limits, the development standards for the applicable zoning district and State law. This program would not allow new residential

POLICIES		Potential for Environmental Effects
	verifiable by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant or proponent and the public official reviewing the project.	development in areas that are not designated for residential development.
HI-22	To minimize the potential for confusion regarding the applicability of the City's design guidelines, the City shall amend all zones that reference the guidelines (for example, MU, RC, etc.) to make it clear that they are recommendations and not enforceable standards of the Zoning Code.	None. No physical change to the environment would occur.
HI-23	To ensure housing development in the City is occurring at the projected densities consistent with the income categories anticipated, the City will annually review building development on the vacant and likely developable sites included in the sites inventory of this element. If the annual review shows that sites are not providing sufficient opportunities for housing affordable to lower-income households, the City will review its Zoning Code to consider other measures, including the adoption of incentives or regulatory mechanisms to encourage construction at the mid-point or higher end of the density range. These measures could include but are not limited to: 1) requiring a minimum residential density; and 2) density bonuses (such as, specifying development standards that may be modified to make units more affordable – reduced lot sizes, increased ground coverage, etc.).	None. Although this program would result in an amendment to the Zoning Code to encourage housing production at the higher end of the density range for residential zoning districts, this program would not allow new residential development in areas that are not designated for residential development. Future development would comply with General Plan density limits and would not result in more severe environmental impacts than previously analyzed for housing development in the City. Any future amendments to the Zoning Code would be subject to review pursuant to CEQA.

2. Other Public Agencies whose Approval is Required

The Draft 6th Cycle Housing Element was submitted to HCD for a 60-day formal review period on August 28, 2023. A comment letter was received from HCD on September 20, 2023, which determined the following (HCD, 2023):

> *"The revised draft element meets the statutory requirements of State Housing Element Law, including as described in HCD's August 29, 2022 review. However, the housing element cannot be found in substantial compliance until the City has completed necessary rezones as described below. The housing element will substantially comply with State Housing Element Law (Gov. Code, § 65580 et seq.) when the necessary rezoning is complete and the element is adopted, submitted to, and approved by HCD, in accordance with Government Code section 65585.*
>
> *Generally, pursuant to Government Code section 65584.09, if a city did not make available sites to accommodate the regional housing need allocation (RHNA), then the city shall, within the first year of the planning period of the new element, rezone adequate sites to accommodate the unaccommodated portion of the RHNA from the prior planning period. The City has an unaccommodated need from the prior planning period (Table 20). Since more than a year has lapsed from the beginning of the current planning period, the element cannot be found in compliance until the required rezoning is complete. Specifically, the element cannot be found in compliance until Program HI-14 (Rezoning and By Right Procedures) is implemented to meet the unaccommodated need from the 5th cycle RHNA. Once the rezoning has been completed, the City should submit documentation (for example, resolution, ordinance) to HCD and HCD will review and approve the element in accordance with Government Code section 65585."*

The City will seek certification of the Housing Element from HCD upon the implementation of Program HI-14.

3. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

As described below, the City has complied with the tribal consultation requirements of SB 18 and AB 52.

Senate Bill (SB) 18

CGC §65352.3 (SB 18) requires local governments to contact tribal organizations prior to adopting or amending a General Plan or Specific Plan, and prior to designating open space. The intent of SB 18 is to provide Native American tribes an opportunity to participate in land use decisions for the purpose of protecting or mitigating impacts to Native American cultural resources and sacred sites. To satisfy the requirements of SB 18, the City provided written notice of the proposed 2019-2027 Housing Element Update to the Tribes in the Humboldt Bay region at the beginning of August 2022. Tribes have 90 days to respond to the request for consultation under SB 18 and no responses were received.

Assembly Bill (AB) 52

Public Resources Code (PRC) §21084.2 (AB 52) establishes that "*a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment*."

Pursuant to AB 52, in order to determine whether a project may have such an effect, a lead agency is required to consult with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project if the tribe requested to the lead agency, in writing, to be informed through formal notification of proposed projects in the geographical area, and the tribe responds, in writing, within 30 days of receipt of the formal notification and requests the consultation.

To satisfy the requirements of AB 52, the City provided written notice of preparation of a CEQA Initial Study for the 2019-2027 Housing Element Update to the Tribes in the Humboldt Bay region at the end of January 2024. No responses were received.

4. Environmental Factors Potentially Affected

This Project would potentially affect the environmental factors checked below, involving at least one impact that is "potentially Significant" or "less than Significant with Mitigation Incorporated" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agricultural / Forestry Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology / Soils	☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials
☐ Hydrology / Water Quality	☐ Land Use / Planning	☐ Mineral Resources
☐ Noise	☐ Population / Housing	☐ Public Services
☐ Recreation	☐ Transportation / Traffic	☐ Tribal Cultural Resources
☐ Utilities / Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance
☒ None		

DETERMINATION

On the basis of this Initial Study:

☒ I find that the proposed project COULD NOT have a significant effect on the environment and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the project and mitigation measures have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT will be required.

Garry Rees, AICP, Contract City Planner Date

Aesthetics

	Potentially Significant Impact	*Less Than Significant With Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Except as provided in Public Resources Code Section 21099, **would the project:**				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Setting

Scenic vistas in the Mad River Valley area generally consist of views of nearby ridge tops, the agricultural valley, and the Mad River, which drains into the Pacific Ocean to the west. The City limits are bordered to the north and east by forested hillsides, to the south by the Mad River, and to the west by the Blue Lake Rancheria. Development in the City primarily consists of single-family residential development with commercial uses, public facilities, and apartments in the Downtown, and industrial, light industrial, and commercial uses in the Powers Creek District. The “Entrance to the City” is mostly uncluttered, lacking the typical services found at many other highway interchanges around the State. One exception is the development on Blue Lake Rancheria lands, including the Casino, hotel, gas station, and associated signage.

Regulatory Framework

Local

Future development on any sites identified for residential development in the Housing Element Update will be required to comply with all relevant General Plan policies including:

Land Use Element - Character, Compatibility, Environmental Quality Policies:

Policy 1 All new residential development shall be consistent with the character of the City and blend with existing development.

Policy 3 Residential areas shall be kept free from incompatible or inharmonious uses except om the case of mixed-use areas where uses are designed and situated to minimize potential impacts. Special consideration shall be given to compatibility of adjoining land uses whenever Zoning Map changes are proposed within or adjacent to a residential district.

Land Use Element - Siting, Density Policies:

Policy 1 All types of dwelling units shall be placed on their site so as to provide adequate usable outdoor living area. Building sites shall be considered with respect to the location of other buildings, streets, terrain, and to other elements of the environment.

Policy 3 Planned Unit Developments, clustering, and other innovative development design techniques shall be encouraged, where feasible, to maximize open space and allow flexibility in design.

Discussion

The Housing Element Update is a policy document that does not result in physical changes to the environment but encourages the provision of housing in areas of the City that are already designated and zoned to allow residential development. While policies could require amendments to the Zoning Code or result in actions of the City that could cause a physical change, the policies would not result in specific physical changes to the environment. Additionally, any amendments to the Zoning Code would be subject to project-specific environmental review pursuant to CEQA.

a) Less Than Significant Impact. The City of Blue Lake has not designated any scenic vistas within the boundary of the City limits or Sphere of Influence. Based on the existing development in the City and the areas identified as vacant and likely developable in the site inventory, it is not anticipated that the Housing Element Update would have a substantial adverse effect on any scenic vistas designated by other jurisdictions such as the County of Humboldt. Therefore, the Housing Element Update would have a less than significant impact in this regard.

b) No Impact. State Route 299 is classified as eligible to be a state designated scenic highway north of the City but is not currently a state designated scenic highway (Caltrans, 2024). Therefore, the Housing Element Update would have no impact on a state scenic highway or historic and natural resources within a state scenic highway.

c-d) Less Than Significant Impact. The Housing Element Update does not include site-specific designs or development proposals, nor does it permit development entitlements that would degrade the existing visual character of the City. The Housing Element Update anticipates land uses that are consistent with the General

Plan and would not remove policies that protect aesthetic resources or Zoning Code requirements associated with site planning and development standards.

As discussed in the Project Description in Section 1, the proposed project would involve amending the City's Zoning Code to create a Multi-Family Combining Zone to allow multi-family projects without discretionary review or by-right at a density of 16 units per acre or 1 unit per 2,722.5 square feet of lot area (City of Blue Lake, 2024b; see Implementation Program HI-14). Due to the availability of adequate sites with limited constraints within the City where the combining zone could be applied during the 6th cycle planning period, the combining zone is anticipated to be applied to a property in the City's Powers Creek District that is zoned Opportunity (O) and already allows for residential development. It should be noted that the combining zone would not result in a higher density than is already allowed by the O zone, which allows for 1 unit per 2,500 square feet or 17.4 units per acre. To meet the requirement for by-right zoning in Government Code Section 65583.2, subdivisions (h) and (i), the property would need to be sufficiently sized to allow a capacity of at least 11 units, which would be a minimum of 27,500 square feet (~0.63-acres) at the residential density allowed in the O zone (1 unit per 2,500 square feet of lot area). Any by-right project proposed on a property where the combining zone has been applied would not be subject to CEQA. Considering the existing low aesthetic quality and value of the development in the Powers Creek District, the development of modern residential buildings on a property subject to the combining zone would not be considered to substantially degrade the existing visual character or quality of public views of the District and its surroundings. Therefore, there would be a less than significant impact in this regard.

Future residential development has the potential to increase daytime glare or nighttime illumination in the City, and potential impacts would be considered on a project-by-project basis when projects are reviewed for compliance with the City's General Plan and the development standards of the Zoning Code. For example, much of the City's multi-family development potential is projected to occur in the Powers Creek District on properties that are zoned Opportunity (O). As noted above, this includes a property in the district that would be rezoned to apply a Multi-Family Combining Zone that allows multi-family development by-right. To reduce potential lighting/glare impacts, Section 17.16.111(E)(3) of the O zone has performance standards addressing lighting design that requires compliance with the DarkSky International standards for reducing ambient light ("dark sky compliant"; City of Blue Lake, 2024b). The remaining sites identified as vacant and likely developable in the site inventory of the Housing Element Update are anticipated to be developed with unit types ranging from single-family residences to four-plexes, which are not typically associated with substantial lighting impacts. With the implementation of the existing standards in the City's Zoning Code, impacts related to lighting and glare would be less than significant.

AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.
Would the project:

	Potentially Significant Impact	***Less Than Significant With Mitigation Incorporated***	***Less Than Significant Impact***	***No Impact***
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☒	☐
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Setting

Agricultural uses, in and around Blue Lake, and throughout Humboldt County include timber, livestock, nursery, vegetable and field crops, cannabis, and fruit and nut crops. While agriculture is one of the most enduring industries in the County, agricultural operators face growing challenges to maintain viable

operations. Rising costs, increasingly complex regulatory requirements, and growing development pressures are among the hurdles facing today's farmers. Agriculture is an important component of the local economy and culture, but adverse economics and generational transitions have accelerated the conversion of farmland to other uses. Despite protection policies in the Humboldt County General Plan, the conversion of agricultural lands to non-agricultural uses has continued over time. It is estimated that approximately 3,000 to 5,000 acres of agricultural land has been converted to non-agricultural use each year since 1964 (County of Humboldt, 2017).

The majority of the agricultural preserves in Humboldt County are located in the southern portion of the coastal zone and the southeastern portion of the County. No land within the City is under a Williamson Act Contract, conservation easement, or other mechanism for the preservation of agricultural land. There is one parcel zoned Agriculture Exclusive (AE; allows 1 unit per 10 acres) in the southern portion of the City, which has historically been used for limited crop production and grazing purposes. There are prime farmland soils within the City limits that exist on parcels that are not economically viable agricultural units and have therefore been zoned for residential, commercial, public facility, and industrial development.

The City does not have a zone for the protection of timberlands or forest lands and there are no timberlands or forestlands within City limits (as defined by defined by Public Resources Code Section 4526, by Government Code Section 51104(g) or Public Resources Code Section 12220(g)).

Regulatory Framework

Local

Future development on any sites identified for residential development in the Housing Element Update will be required to comply with all relevant General Plan policies including:

<u>Land Use Element - Preservation of Open Space and Agricultural Lands Policies:</u>

Policy 1 Land suited for agriculture shall be used for that purpose, where prime or potentially prime agricultural soils occur in economically viable units.

Policy 2 There shall be an agricultural land use designation that permits exclusively agricultural uses, including a single-family residence per land unit.

Policy 3 Uses considered compatible with agricultural uses shall be permitted in agriculturally designated areas; such uses shall not preclude the viability or use of the land for agricultural purposes.

Policy 6 Agricultural and potentially incompatible uses shall be separated, where possible, by such natural or man-made features as roads, vegetation, stream courses or topographical features.

Policy 13 The City shall provide levels of service appropriate for agricultural land, in order to encourage its continued use for agriculture and discourage its conversion to other uses.

Policy 14 The City shall pursue acquiring forest lands to the east of the City limits for use as a community forest.

Discussion

The Housing Element Update is a policy document that does not result in physical changes to the environment but encourages the provision of housing in areas of the City that are already designated and zoned to allow residential development. While policies could require amendments to the Zoning Code or result in actions of the City that could cause a physical change, the policies would not result in specific physical changes to the environment. Additionally, any amendments to the Zoning Code would be subject to project-specific environmental review pursuant to CEQA.

a) Less Than Significant Impact. The Housing Element Update does not include site-specific designs or development proposals, nor does it permit development entitlements. The site inventory in the Housing Element Update only identifies sites as vacant and likely developable that are already zoned for residential use. There are prime agricultural soils that exist on a few parcels in the City zoned for residential development, but these sites are not economically viable agricultural units (such as, <10 acres and surrounded by development or lands zoned for non-agricultural development) and have been previously zoned for non-agricultural use. Therefore, the proposed project would result in a less than significant impact on this resource category.

b-e) No Impact. The site inventory in the Housing Element Update does not identify any lands as vacant and likely developable that are zoned for agricultural use. Additionally, there are no properties in the City that are subject to a Williamson Act contract. Therefore, the Housing Element Update would result in no impact related to conflict with existing zoning for agricultural use or a Williamson Act contract.

The City does not have a zoning district for the protection of timberlands or forestlands and there are no timberlands or forestlands within City limits. As such, the Housing Element Update would result in no impact to timberlands or forest lands.

The Housing Element Update does not include site-specific designs or development proposals, nor does it permit development entitlements. The Housing Element Update anticipates land uses that are consistent with the General Plan and would not remove policies that protect agricultural and timberland resources or Zoning Code requirements associated with site planning and development regulations. As noted above, the site inventory of the Housing Element Update does not identify sites as vacant and likely developable that are zoned for agriculture or timberland uses. Therefore, the Housing Element Update would not involve other changes in the existing environment which, due to their location or nature, would result in the conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use. Therefore, there would be no impact in this regard.

Air Quality

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. **Would the project:**				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Setting

The project site is located in Humboldt County, which lies within the North Coast Air Basin (NCAB). The NCAB extends for 250 miles from Sonoma County in the south to the Oregon border. The climate of NCAB is influenced by two major topographic units: the Klamath Mountains and the Coast Range provinces. The climate is moderate with the predominant weather factor being moist air masses from the ocean. Average annual rainfall in the area is approximately 60 inches, with the majority falling between October and April. Predominate wind direction is typically from the northwest during summer months and from the southwest during storm events occurring during winter months.

As in all of northern California, the principal control on climate in the NCAB is the high-pressure cell (Pacific High), which is often present off the west coast of North America. Because of the wintertime southward shift in the Pacific High, the NCAB is subject to a series of frontal systems which sweep across the region in an almost unbroken succession. In the summer, the Pacific High shifts northward diverting most storms well to the north of California. Due to the upwelling immediately off the coast, the comparatively warm Pacific air mass drifting over this band of cold water is cooled in the lower layers forming a deck of coastal stratus. As this stratus bank sweeps inland, the air is heated so that the moisture evaporates a few miles inland. This bank of clouds usually extends inland further during the night and then recedes to the vicinity of the coast during the day. Prevailing winds are generally from the northwest through north along the coast. The coastal ranges are responsible for deflecting these winds so that except for the immediate coast, the wind direction is likely to be more a product of local terrain than it is of the prevailing circulation.

Humboldt County is listed as “attainment” or “unclassified” for all federal ambient air quality standards, and all state standards with the exception of particulate matter (PM-10; NCUAQMD, 2024). Air quality in the City is influenced mostly by pollutant transport from upwind areas, such as Arcata, but also by local emission sources, such as wood burning stoves and fireplaces during the winter months, and vehicles using area roadways such as State Route 299. When there is a local air inversion, the air quality in Blue Lake deteriorates, but this is mostly due to pollutants generated outside of the City’s jurisdiction (City of Blue Lake, 2004).

Sensitive receptors (for example, children, senior citizens, and acutely or chronically ill people) are more susceptible to the effect of air pollution than the general population. Land uses that are considered sensitive receptors typically include residences, schools, parks, childcare centers, hospitals, and retirement homes.

Regulatory Framework

Air Quality is regulated at federal, state, and local levels. The U.S. Environmental Protection Agency regulates at the Federal level. The California Air Resources Board (CARB, 2022) regulates at the state level. The North Coast Unified Air Quality Management District (NCUAQMD) regulates at the regional or district level, which includes Humboldt, Del Norte, and Trinity Counties. The NCUAQMD has not formally adopted significance thresholds for use in environmental review of land use projects. However, the NCUAQMD requires the implementation of Best Available Control Technology (BACT) to reduce the impacts of stationary sources if they are estimated to exceed specified emission rates for criteria pollutants.

Discussion

The Housing Element Update is a policy document that does not result in physical changes to the environment but encourages the provision of housing in areas of the City that are already designated and zoned to allow residential development. While policies could require amendments to the Zoning Code or result in actions of the City that could cause a physical change, the policies would not result in specific physical changes to the environment. Additionally, any amendments to the Zoning Code would be subject to project-specific environmental review pursuant to CEQA.

a-d) Less Than Significant Impact. As noted in the setting, Humboldt County is listed as “attainment” or “unclassified” for all federal ambient air quality standards, and all state standards with the exception of particulate matter (NCUAQMD, 2024). The NCUAQMD prepared a Particulate Matter Attainment Plan, Draft Report, in May 1995. The plan established goals to reduce particulate matter emissions and eliminate the number of days in which the state standard is exceeded. The Plan includes three areas of recommended control strategies to meet these goals: transportation, land use, and burning. The Housing Element Update indicates that most of the residential development potential on vacant and likely developable sites is located within the City’s Powers Creek District, which is zoned to require a mixture of residential and commercial uses. For example, the District is zoned to not allow residential-only development, in order to promote a beneficial mixture of residential and commercial uses. Land use regulations that promote infill and mixed-use development have the potential to reduce vehicle miles traveled and associated vehicular emissions including diesel particulate matter. Additionally, based on current regulations, it is anticipated that the future

residential development in the City would use gas-burning fireplaces or EPA-approved stoves for heating. As such, the projected future residential development in the City would be consistent with the goals of the Draft Particulate Matter Attainment Plan and impacts would be less than significant in this regard.

The Housing Element Update does not include site-specific designs or development proposals, nor does it permit development entitlements. The Housing Element Update does not allow residential development beyond what is already allowed under the City's current General Plan and Zoning Code. Considering the estimated residential development potential on vacant sites in the City (89 units; see Table 21 in Housing Element Update; City of Blue Lake, 2024b), it is not anticipated that future residential development would result in a cumulatively considerable increase in particulate matter or expose sensitive receptors to substantial pollutant concentrations. Future construction of residential development would be subject to federal, state, and local regulations protecting air quality, such as the California Air Resources Board's construction equipment emissions standards and the NCUAQMD's standards for controlling dust emissions. Additionally, there are currently no sources of substantial pollutant concentrations within or around the City of Blue Lake that would impact future residents. In compliance with applicable laws and regulations, the Housing Element Update would result in less than significant adverse environmental impacts related to particulate matter emissions and the exposure of sensitive receptors to pollutant concentrations.

The Housing Element Update is a policy-level document that encourages the provision of a range of housing types and affordability levels on sites that are already zoned for residential development. Potential odors generated from future residential construction activity (for example, diesel-powered construction equipment, asphalt paving, etc.) would be short-term in nature and would not result in permanent impacts to surrounding land uses and would not affect a substantial number of people. Residential development is typically considered a sensitive receptor as opposed to a land use type that can generate substantial emissions such as odors. Therefore, there would be a less than significant impact in this regard.

Biological Resources

Would the project:	*Potentially Significant Impact*	*Less Than Significant With Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife services?	☐	☐	☒	☐
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Setting

The City of Blue Lake is an incorporated city located in Humboldt County, California, eight miles inland from Humboldt Bay on State Route 299 (see **Figure 1**). The City is situated in the Mad River Valley and the Mad River borders the City on the south and west. Potential flooding along a portion of the City is controlled by a levee. The lands surrounding the City are comprised of steep hillsides to the north and east and generally flat,

agricultural lands to the west and south. Large portions of the surrounding hillsides are owned by a timber company and are harvested for timber production, with large areas that have been clear cut in the past. Agricultural lands in the Mad River Valley are used for cattle grazing and intensive crop production. The City is primarily a residential community with a downtown area consisting of limited commercial development. The City's Powers Creek District, which is a former lumber mill site that is located on the southwestern portion of the City, has been redeveloped over the last several decades with commercial, manufacturing, public facility, and heavy industrial uses.

A few of the vacant or underutilized parcels in the western portion of the City have areas that fall under the current federal definition of wetlands. The larger vacant properties in and adjacent to the Powers Creek District are located along Powers Creek, which is a tributary to the Mad River. The suburban nature of the City, adjacent to a major river system and extensive forested lands, offers pockets of suitable habitat for a variety of wildlife species.

Regulatory Framework

A number of existing Federal, State and Local laws and regulations are in place for the preservation of biological resources, including but not limited to the following:

Federal

Federal Clean Water Act

Section 404

Under Section 404 of the Clean Water Act (CWA), the U.S. Army Corps of Engineers (USACE) regulates the discharge of dredged or fill material into wetlands and waters of the U.S. The USACE requires that a permit be obtained prior to the placement of structures within, over, or under navigable waters and/or prior to discharging dredged or fill material into waters below the ordinary high-water mark (OHWM).

Section 401

Under Section 401 of the CWA, a project requiring a USACE Section 404 permit is also required to obtain a State Water Quality Certification (or waiver) to ensure that the project will not violate established State water quality standards. When a discharge is proposed to waters outside of federal jurisdiction, the discharge is regulated under the State Porter-Cologne Water Quality Control Act through the issuance of Waste Discharge Requirements (WDRs). The State has a policy of no-net-loss of wetlands and requires mitigation for impacts to wetlands before it issues water quality certifications or WDRs.

Federal Endangered Species Act

The Federal Endangered Species Act (FESA) of 1973 requires that all federal agencies ensure that any action they authorize, fund, or carry out will not likely jeopardize the continued existence of federally listed species or result in the destruction or adverse modification of critical habitat. Projects that would result in "take" of any federally listed species are required to obtain authorization from National Marine Fisheries

Service (NMFS) and/or U.S. Fish and Wildlife Service (USFWS) through either Section 7 (interagency consultation) or Section 10(a) (incidental take permit) of FESA, depending on whether the federal government is involved in permitting or funding the project.

Federal Migratory Bird Treaty Act

Under the Migratory Bird Treaty Act (MBTA) of 1918, as amended, migratory bird species listed in CFR Title 50, §10.13, including their nests and eggs, are protected from injury or death, and any project-related disturbances. The MBTA applies to over 1,000 bird species, including geese, ducks, shorebirds, raptors, and songbirds, some of which were near extinction before MBTA protections were put in place in 1918. The MBTA provides protections for nearly all native bird species in the U.S., including nonmigratory birds.

Fish and Wildlife Conservation Act

Under the Fish and Wildlife Conservation Act of 1980, as amended, the USFWS maintains lists of migratory and non-migratory birds that, without additional conservation action, are likely to become candidates for listing under the FESA. These species are known as Birds of Conservation Concern and represent the highest conservation priorities.

Magnuson-Stevens Fishery Conservation and Management Act

The Magnuson-Stevens Fishery Conservation and Management Act (MSFCMA), also known as the Sustainable Fisheries Act, requires the identification of Essential Fish Habitat (EFH) for federally managed fishery species and implementation of appropriate measures to conserve and enhance EFH that could be affected by project implementation. All federal agencies must consult with NMFS on projects authorized, funded, or undertaken by an agency that may adversely affect EFH for species managed under the MSFCMA.

State

California Endangered Species Act

Under the California Endangered Species Act (CESA), the Fish and Game Commission is responsible for listing and delisting threatened and endangered species. The California Department of Fish and Wildlife (CDFW) maintains documentation and occurrence records on listed species, including candidate species for threatened or endangered status, fully protected species, species of special concern (SSC). SSC are vulnerable to extinction but are not legally protected under CESA; however, impacts to SSC are generally considered significant under CEQA.

CESA prohibits the take of State-listed threatened and endangered species, but CDFW has the authority to issue incidental take permits under special conditions when impacts are minimized and mitigated. Fully protected species may not be taken or possessed at any time, and no licenses or permits may be issued for their take. One exception allows the collection of fully protected species for scientific research.

California Fish and Game Code §1600-1616 (Streambed Alteration)
California Fish and Game Code §1600 et seq., requires that a project proponent enter into a Streambed Alteration Agreement (SAA) with CDFW prior to any work that would divert or obstruct the natural flow of any river, stream, or lake; change the bed, channel, or bank of any river, stream, or lake; use material from any river, stream, or lake; and/or deposit or dispose of material into any river, stream, or lake. The SAA includes conditions that minimize/avoid potentially significant adverse impacts to riparian habitat and waters of the state.

California Fish and Game Code §3503 and 3503.5 (Nesting Bird Protections)
These sections of the Code provide regulatory protection to resident and migratory birds and all birds of prey within the State and make it unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by the Code.

California Fish and Game Code §1900-1913 (Native Plant Protection Act)
The Native Plant Protection Act (NPPA) includes measures to preserve, protect, and enhance native plants that are listed as rare and endangered under the CESA. The NPPA states that no person shall take, possess, sell, or import into the state, any rare or endangered native plant, except in compliance with provisions of the Act. The California Native Plant Society categorizes the rarity of native plants in California. Rank 1B plants are rare, threatened, or endangered in California and elsewhere. Rank 2 plants are rare, threatened, or endangered in California, but are more common elsewhere. Rank 3 plants are those about which more information is needed (a review list). Rank 4 plants have limited distribution (a watch list).

Local

Future development on any sites identified for residential development in the Housing Element Update will be required to comply with all relevant General Plan policies including:

<u>Land Use Element - Environmental Protection policies:</u>

Policy 1 The City shall consider all development with respect to potential impacts on environmental quality.

Policy 2 Developers shall be encouraged to design projects so as to avoid topography changes and unnecessary stripping of natural foliage. Where feasible, existing trees and terrain shall be preserved by fitting streets and building sites into the landscape with minimum disturbance of the land, its natural vegetation and creek ways. Developers shall be encouraged to use existing natural vegetation and topographic features to provide required open space and landscaping.

<u>Land Use Element - Agriculture and Open Space policies:</u>

Policy 9 Property owners should be encouraged to keep areas with unique natural features in a natural or enhanced condition. Such areas include the Mad River, Powers Creek, and the site of the historic lake.

Land Use Element - Creeks & Wetlands policies:

Policy 1 Powers Creek shall be managed to maintain the creek as a scenic and natural resource, and to protect adjacent properties and structures to the greatest degree possible.

Policy 7 The various wetland areas throughout the City shall be maintained as a scenic and habitat resource, and to prevent flooding impacts due to the modification of existing hydrology.

Discussion

The Housing Element Update is a policy document that does not result in physical changes to the environment but encourages the provision of housing in areas of the City that are already designated and zoned to allow residential development. While policies could require amendments to the Zoning Code or result in actions of the City that could cause a physical change, the policies would not result in specific physical changes to the environment. Additionally, any amendments to the Zoning Code would be subject to project-specific environmental review pursuant to CEQA.

a-e) Less Than Significant Impact. The Housing Element Update anticipates residential development that is consistent with the City's General Plan and Zoning Code. Additionally, the Update would not remove policies that protect biological resources or Zoning Code requirements associated with site planning and development regulations.

Future residential development may have the potential to result in significant impacts to special-status species and sensitive natural communities such as riparian habitat and federally protected wetlands. However, compliance with existing federal and state laws and regulations, including but not limited to those listed above in the discussion of Regulatory Framework, would result in the avoidance and/or minimization of direct and indirect impacts to special-status species and sensitive habitats. These regulations require site-specific analysis where a project site contains potential habitat for special-status species including wetlands and riparian areas. Based on the result of the site-specific analysis and where appropriate, federal and State agencies will require mitigation for project-level impacts. **In addition, the City of Blue Lake has setback requirements that would be protective of riparian areas such as Powers Creek. For example, the Opportunity zone, where the majority of residential development potential is identified in the City, requires setbacks from the centerline of Powers Creek and the southern edge of the creek trail. For the vacant properties north of Taylor Way, this functionally results in an approximately 75-foot setback from the creek centerline (or 50 feet from the top of bank).** In compliance with existing laws and regulations, the Housing Element Update would not have a substantial adverse effect on special-status species and their habitat, riparian habitat, wetlands, or wildlife corridors and would not conflict with any local policies or ordinances protecting biological resources. Therefore, the proposed project would have a less than significant impact related to biological resources.

As discussed in the Project Description in Section 1, the proposed project would involve amending the City's Zoning Code to create a Multi-Family Combining Zone to allow multi-family projects without discretionary review or by-right at a density of 16 units per acre or 1 unit per 2,722.5 square feet of lot area (City of Blue Lake, 2024b; see Implementation Program HI-14). Due to the availability of adequate sites with limited

constraints within the City where the combining zone could be applied during the 6th cycle planning period, the combining zone is anticipated to be applied to a property in the City's Powers Creek District that is zoned Opportunity (O) and already allows for residential development. It should be noted that the combining zone would not result in a higher density than is already allowed by the O zone, which allows for 1 unit per 2,500 square feet or 17.4 units per acre. To meet the requirement for by-right zoning in Government Code Section 65583.2, subdivisions (h) and (i), the property would need to be sufficiently sized to allow a capacity of at least 11 units, which would be a minimum of 27,500 square feet (~0.63-acres) at the residential density allowed in the O zone (1 unit per 2,500 square feet of lot area). Any by-right project that would be proposed on the property where the combining zone has been applied, would not be subject to CEQA. **However, when building permits are applied for in the future, referrals will be sent to the various City departments for review of the projects. If the City departments observe that a site that the combining zone has been applied to contains aquatic resources (e.g. creeks or wetlands) or other potentially sensitive habitat areas, staff would send referrals to regulatory agencies for comment (e.g., U.S. Army Corps of Engineers, North Coast Regional Water Quality Control Board, California Department of Fish and Wildlife, etc.). Any comments received from the regulatory agencies requiring measures necessary to comply with federal and State regulations protecting biological resources, would be required to be implemented by the applicant. Additionally, the City departments have the ability to require applicants to prepare technical studies to determine what potential impacts could occur to biological resources from a project (e.g., Biological Resources Assessment, Wetland Delineation, etc.). Any recommendations provided in the studies to ensure compliance with federal and State regulations protecting biological resources, would be required to be implemented by the applicant.** Considering that the properties available for residential development in the Powers Creek District were previously prepared for industrial development, including grading and the installation of access and utility infrastructure, it is anticipated that development of these properties in compliance with existing laws and regulations would result in less significant impacts to biological resources.

f) No Impact. There are no Habitat Conservation Plans, Natural Community Conservation Plans, or other approved habitat conservation plans within or directly adjacent to the City and; therefore, the Housing Element Update would not conflict with such a plan. No impact would occur in this regard.

Cultural Resources

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☐	☒	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

Setting

Cultural resources are remains and sites associated with human activities, including Native American archaeological sites (both prehistoric remains and sites occupied after European arrival), historic buildings and archaeological sites, and natural landscape elements with traditional cultural significance (including areas of economic and religious significance).

The City lies within the traditional territory of the Pat-a-wat division of the Wiyot Indian tribe. By the time of the arrival of European settlers in 1850, the Blue Lake area had become a borderland zone between the territories of the Wiyot and Whilkut tribes (Loud, 1918). The Wiyots of Mad River were a subunit of the larger Wiyot tribe, and were known as Pat-a-wats, after the Wiyot name for Mad River. The territory for the Pat-a-wats was generally described as the lower Mad River from Blue Lake near the junction of the North Fork down to the coast, and thence south to the southern shore of Humboldt Bay (Merriam, 1976).

Ranching has taken place in the vicinity of Blue Lake since the mid-1800s. Early ranching and mining operations often involved construction of access roads, railroads, residential and farm structures, and additional features (for example, ponds, ditches, irrigation components, etc.). Collectively, these historic activities have affected many of the prehistoric sites in the region.

The City of Blue Lake contains at least 60 residences that have historical interest as documented in the 1990 Blue Lake Community Development Corporation (CDC) Historical Research Report (City of Blue Lake, 1990). Despite the number of historic buildings in the City, the City does not have a designated historic district.

Regulatory Framework

A number of existing Federal, State, and Local laws and regulations are in place for the preservation of cultural resources, including but not limited to the following:

Federal

Section 106 of the National Historic Preservation Act (NHPA)
Section 106 of the NHPA and its implementing regulations require federal agencies to take into account the effects of their activities and programs on historic properties. A historic property is any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in the National Register of Historic Places (NRHP). Section 106 applies to projects undertaken or funded by federal agencies, and projects that require a federal-agency permit.

State

California Environmental Quality Act (CEQA)
CEQA Guidelines §15064.5 et seq. requires that projects financed by or requiring the discretionary approval of public agencies in California be evaluated to determine potential adverse effects on historical and archaeological resources. Historical resources are defined as buildings, sites, structures, or objects, each of which may have historical, architectural, archaeological, cultural, or scientific importance. Section 15064.5 also includes provisions for the accidental discovery of cultural resources and human remains.

Local

The Blue Lake General Plan also includes policies specific to cultural resource protection including the following:

<u>Land Use Element - Cultural Resources Policies:</u>

Policy 1 The potential for significant impacts to cultural resources shall be identified, as required by State law, during discretionary project review under CEQA.

Policy 2 Projects not subject to CEQA shall be required to adhere to an inadvertent discovery protocol for archaeological resources.

<u>Housing Element Update – Preservation and Reuse of Older Structures Program</u>:

HP–1.6. Preserve the City's more affordable housing stock along with historical and cultural heritage through preservation and innovative reuse of older structures.

Discussion

The Housing Element Update is a policy document that does not result in physical changes to the environment but encourages the provision of housing in areas of the City that are already designated and zoned to allow residential development. While policies could require amendments to the Zoning Code or result in actions of the City that could cause a physical change, the policies would not result in specific physical changes to the environment. Additionally, any amendments to the Zoning Code would be subject to project-specific environmental review pursuant to CEQA.

a-c) Less Than Significant Impact. The Housing Element Update anticipates residential development that is consistent with the City's General Plan and Zoning Code. Additionally, the Update would not remove policies that protect cultural resources or Zoning Code requirements associated with site planning and development regulations. Construction activities for future residential development have the potential to uncover unknown cultural resources, including human remains found outside of cemeteries.

The sites identified for residential development in the Housing Element Update site inventory are vacant. As such, future residential development on these sites would not impact structures of historic interest in the City.

All future residential development within the City would be required to comply with local and State regulations that protect cultural resources. At the local level, the City's General Plan and the regulations in Municipal Code Chapter 15.12 (Grading, Erosion, and Sediment Control) require the implementation of an inadvertent discovery protocol for all development. This protocol requires construction activity to cease if cultural resources are encountered during permitted or non-permitted construction activities. Future projects that require discretionary review would also be subject to review under CEQA, which could require consultation with local Tribes and preparation of a site-specific Cultural Resources Investigation. If a site is considered sensitive for cultural resources or resources are discovered during site-specific investigation, mitigation would be required to reduce potential impacts. Additionally, California Health and Safety Code (CHSC) Section 7050.5 requires halting site disturbance upon discovery of human remains until a coroner has conducted an investigation. If the remains are determined to be of Native American descent, CHSC Section 5067.98 requires that the most likely descendant(s) be notified immediately.

In compliance with local and State laws and regulations protecting cultural resources, the Housing Element Update would result in a less than significant impact to cultural resources.

Energy

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Setting

In Humboldt County, energy is primarily used as a transportation fuel and as electrical and heat energy in homes, businesses, industries, and agriculture. The majority of energy used in Humboldt County is imported, with the exception of biomass energy. Although the majority of electricity is generated in the county, a large portion of it is generated using natural gas. The county imports about 90% of its natural gas; the rest is obtained locally from fields in the Eel River valley (Schatz Energy Research Center, 2005). Essentially all of the county's transportation fuels are imported.

Humboldt County is remotely located at the end of the electrical and natural gas supply grids, and this limits both energy supply options and system reliability. Pacific Gas & Electric Company (PG&E) owns the natural gas and electricity transmission and distribution systems in Humboldt County. There is one major natural gas supply line that serves the county and four electrical transmission circuits (Schatz Energy Research Center, 2005).

Prior to May 2017, electricity provided to the City was primarily sourced from the PG&E Humboldt Bay Generating Station (HBGS), which is located just south of the City of Eureka along Humboldt Bay. The HBGS began commercial operation in 2010 and normally runs on natural gas, with ultra-low sulfur diesel as its backup fuel (CEC, 2024).

Beginning in May 2017, the electricity source for Humboldt County transitioned to the Redwood Coast Energy Authority (RCEA) Community Choice Energy (CCE) program (RCEA, 2024). The CCE program allows city and county governments to pool (or aggregate) the electricity demands of their communities in order to increase local control over electric rates, purchase power with higher renewable content, reduce greenhouse gas emissions, and reinvest in local energy infrastructure. The electricity continues to be distributed and delivered over the existing power lines by PG&E (RCEA, 2024). In 2022, the CCE program procured approximately 50 percent of its power from renewable sources (RCEA, 2022). In addition, customers can choose to opt up to a premium service called Repower+, which is 100 percent renewable energy at only $0.01 more per kilowatt hour (kWh) (RCEA, 2024). RCEA is pursuing the following procurement goals which

will further increase the percentage of power from renewable resources for all of its customers – 100% carbon-free electricity by 2025 (RCEA Board goal adopted in 2019) and 100% local carbon-free electricity by 2030 (Board goal adopted in 2016) (RCEA, 2021).

Regulatory Framework

State

The California Code of Regulations (CCR) Title 24 regulates structural safety and sustainability for residential and other developments. The California Energy Commission (CEC) updates the Building Energy Efficiency Standards (Energy Code), Title 24 section 6, every three years. The 2022 Building Energy Efficiency Standards went into effect January 2023. Future residential development in Blue Lake would be subject to building energy efficiency standards set forth by Title 24.

Discussion

The Housing Element Update is a policy document that does not result in physical changes to the environment but encourages the provision of housing in areas of the City that are already designated and zoned to allow residential development. While policies could require amendments to the Zoning Code or result in actions of the City that could cause a physical change, the policies would not result in specific physical changes to the environment. Additionally, any amendments to the Zoning Code would be subject to project-specific environmental review pursuant to CEQA.

a-b) Less Than Significant Impact. The Housing Element Update is a policy document and does not provide site-specific designs or development proposals, nor does it grant development entitlements. Short-term construction and long-term operational activities as a result of future residential development, would result in energy consumption.

During construction of future residential development, energy would be consumed in the form of petroleum-based fuels used to power off-road construction vehicles and equipment, construction worker and delivery truck travel to and from the project site, and to operate generators to provide temporary power for electronic equipment. There are not anticipated to be any unusual characteristics of future residential development that would require the use of construction equipment or practices that would be less energy efficient than at comparable construction sites in the region or State. Construction activity would be temporary and fuel consumption would cease once construction ends. Further, various construction equipment would be supplied by onsite generators, and would not require permanent connections to or otherwise burden local utilities. Due to the temporary nature of construction activities, the fuel and energy needed during project construction activities would not be considered a wasteful or inefficient use of energy.

During operational activities for future residential development, energy would be consumed for building operations (such as ventilation, heating/cooling, operation of electrical systems, etc.), and transportation of vehicles. As required by State regulations, the design and construction of future residential development would be in accordance with California's Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6, of the California Code of Regulations). These requirements regulate insulation,

window space and type, and other building features to maximize structural energy efficiency. These standards also require the installation of solar panels on certain residential buildings to offset electricity use. Compliance with these standards restricts unnecessary residential energy consumption.

The Housing Element Update indicates that most of the residential development potential on vacant and likely developable sites is located within the City's Powers Creek District, which is zoned to require a mixture of residential and commercial uses. For example, the District is zoned to not allow residential-only development, in order to promote a beneficial mixture of residential and commercial uses. Land use regulations that promote infill and mixed-use development have the potential to reduce vehicle miles traveled and transportation-related energy consumption. Additionally, consistent with State and local plans for renewable energy, future residential development in the City will be provided increasingly renewable sources of energy from the RCEA CCE program.

In compliance with existing laws and regulations, the Housing Element Update would result in a less than significant impact related to energy.

Geology and Soils

Would the project:	*Potentially Significant Impact*	*Less Than Significant With Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

Setting

The City is situated in the lower Mad River Valley; the Mad River borders the City on the south and west. The lands surrounding Blue Lake are comprised of steep hillsides to the north and east and generally flat agricultural lands to the west and south (see **Figure 2**).

The City is located in a downfaulted portion of the Northern Coast Range geologic province of California. Much of the Mad River Basin is underlain by the Franciscan complex (marine sedimentary and metasedimentary rocks). Sedimentary and volcanic rocks were deposited in a marine trough along the west coast of North America, which was subsequently severely deformed and uplifted. The widespread disarray of the rocks within the Franciscan Complex, and prevalence of shear zones, testify to the immense forces involved in its disruption. Most of the deformation took place during and soon after its deposition, so that the shear zones are no longer active. The ubiquitous presence of this sheared rock, however, together with rapid and unpredictable changes in rock type from place to place, give the associated slopes a general, but highly variable, instability.

The youthful and steep topography of the coast range is known for its potential for landslides. Humboldt County in general is at risk from strong ground shaking. The western portions of Humboldt County, and adjoining offshore areas, are regions of moderate to high seismicity. The only known historical surface rupture associated with a fault in the area was in 1906 along the San Andreas Fault in southern Humboldt County. The frequent earthquakes south and southwest of the City of Ferndale indicate modern activity along the Cape Mendocino-False Cape shear zone (City of Blue Lake, 2004).

Liquefaction is defined as “the sudden large decrease of shearing resistance of a cohesionless soil, caused by collapse of the soil structure by shock or strain, and associated with a sudden but temporary increase of the pore fluid mass” (City of Blue Lake, 1975). Fine unconsolidated sand or silt saturated with water is particularly subject to liquefaction. Horizontal to slightly tilted layers of this material may underlie river flood plains and terraces. Earthquake shock waves may cause an overlying sloping soil mass to slide laterally along the temporarily liquified layer at the base.

The lowlands and present river flood plain in the Blue Lake planning area are underlain by river alluvium of undetermined thickness. Such alluvium (salt, sand, pebbles, cobbles) may contain lenses of material susceptible to liquefaction, especially when under the shallow water table (top of saturated zone) characteristic of the area. Although, if these zones are present, they are likely of minor extent, but the possibility of localized liquefaction should not be discounted entirely. The siting of critical structures should assess this potential by means or borings beneath the sites. Under moderate to intense shaking, unconsolidated alluvium and soils may undergo various amounts of horizontal displacement toward adjacent unconfined areas (such as the bluff along a river or stream), associated in some cases, with liquefaction. Cracks and fissures generally accompany this “lurching”, ranging from inches to many feet in length, and of varying widths. Structures located on such ground can be severely disrupted and tilted (City of Blue Lake, 2004).

Mass movement of material on hillsides is a major accompaniment of moderate and strong earthquakes. These can take the form of landslides, rock avalanches, mud and debris flows, or another type of slope failure. Areas north of the City, and along State Route 299 are considered to be at high risk of slope failure, but are determined to not be hazardous to the population within City limits. The majority of the current townsite is in lowland areas characterized by stable gradual slopes and are not at risk of slope failure. There is potential for liquefaction, lurching, cracking, and differential subsidence within the City.

The City is located in close proximity to United States Geologic Survey mapped faults in the Mad River Fault Zone and is vulnerable to shaking caused by a rupture of any of these faults. The closest Alquist-Priolo Zone to the City is approximately 0.75 miles southwest on the eastern side of Fickle Hill. No fault hazard areas have been identified within City limits. The general risks associated with earthquakes in the Blue Lake area are structural damage, slope failures, and liquefaction. These risks tend to be greater in areas of unstable slopes, wet conditions, alluvial deposits, or fill material. Blue Lake is not at risk of potential tsunami damage or inundation due to its inland location (City of Blue Lake, 1975).

Regulatory Framework

Local

Future development on any sites identified for residential development in the Housing Element Update will be required to comply with all relevant General Plan policies including:

Public Safety Element Policies:

Policy 4 Before any major excavation, or the construction of dwellings, public facilities, and large commercial or industrial buildings is permitted by the City within low or moderate stability areas, special studies by a registered soil engineer or licensed geologist should be undertaken by the developer and necessary provisions made for reducing landslide risk.

Policy 5 Any proposed construction of commercial or industrial structures in the area more than 300 feet southwesterly of the railroad right-of-way should be preceded by site investigations to determine the potential for liquefaction and similar types of earth movement resulting from ground shaking.

Discussion

The Housing Element Update is a policy document that does not result in physical changes to the environment but encourages the provision of housing in areas of the City that are already designated and zoned to allow residential development. While policies could require amendments to the Zoning Code or result in actions of the City that could cause a physical change, the policies would not result in specific physical changes to the environment. Additionally, any amendments to the Zoning Code would be subject to project-specific environmental review pursuant to CEQA.

a-d) Less Than Significant Impact. The Housing Element Update is a policy document and does not provide site-specific designs or development proposals, nor does it grant development entitlements. The

Housing Element Update provides policies and programs designed to facilitate the construction and conservation of housing. Future residential development in the City could increase the exposure of people and structures to seismic hazards, including strong seismic shaking and seismic-related ground failure. As noted above in the Setting, the closest Alquist-Priolo Zone to the City is approximately 0.75 miles southwest on the eastern side of Fickle Hill. No fault hazard areas have been identified within City limits.

The State of California provides minimum standards for building design through the California Building Code (CBC). Specific minimum seismic safety and structural design requirements are set forth in CBC Chapter 16. The CBC identifies seismic factors that must be considered in structural design. Development on the sites identified vacant and likely developable in the site inventory of the Housing Element update would be required to comply with State and local regulations related to seismic hazards (for example, building codes and other applicable regulations requiring soil analysis and design-level geotechnical evaluation), which would minimize adverse impacts related to seismic hazards including fault rupture, liquefaction, and landslides. Therefore, the Housing Element Update would result in a less than significant impact in this regard.

There are no expansive soils, as defined in Table 18-1-B of the Uniform Building Code, known to exist on the sites identified as vacant likely developable in the site inventory of the Housing Element Update. Compliance with CBC requirements related to ensuring the suitability of site soils (for example, applicable regulations requiring soil analysis and design-level geotechnical evaluation) would address any potential impacts. Therefore, there would be a less than significant impact in this regard.

e) No Impact. All sites identified as vacant and likely developable in the site inventory of the Housing Element Update would be required to connect to the City's sewer system, in accordance with Blue Lake Municipal Code Section 13.16.030 (City of Blue Lake, 2024b). As such, future residential development would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems. Therefore, there would be no impact in this regard.

f) Less Than Significant impact. No paleontological resources or unique geologic features are known to exist in the City. Regional uplifting and other seismic activity in the area limit the potential for discovery of paleontological resources. Therefore, there would be a less than significant impact in this regard.

	Potentially Significant Impact	*Less Than Significant With Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*

Greenhouse Gas Emissions

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

Setting

Greenhouse gases (GHGs) are gases in the atmosphere that absorb and emit radiation. The greenhouse effect traps heat in the troposphere through a three-fold process, summarized as follows: short wave radiation emitted by the sun is absorbed by the Earth; the Earth emits a portion of this energy in the form of long-wave radiation; and GHGs in the upper atmosphere absorb this long-wave radiation and emit this long-wave radiation into space and toward the Earth. This “trapping” of the long-wave (thermal) radiation emitted back toward the Earth is the underlying process of the greenhouse effect.

Other than water vapor, the primary GHGs contributing to global climate change include the following gases:

- Carbon dioxide (CO2), primarily a byproduct of fuel combustion;
- Nitrous oxide (N2O), a byproduct of fuel combustion and associated with agricultural operations such as the fertilization of crops;
- Methane (CH4), commonly created by off-gassing from agricultural practices (for example, livestock), wastewater treatment, and landfill operations;
- Chlorofluorocarbons (CFCs), which were used as refrigerants, propellants, and cleaning solvents, although their production has been mostly prohibited by international treaty;
- Hydrofluorocarbons (HFCs), which are now widely used as a substitute for chlorofluorocarbons in refrigeration and cooling; and
- Perfluorocarbons (PFCs) and sulfur hexafluoride (SF6) emissions, which are commonly created by industries such as aluminum production and semiconductor manufacturing.

Global climate change is not confined to a particular project area and is generally accepted as the consequence of GHG emissions from global industrialization over the last 200 years. A typical project, even a very large one, does not generate enough GHG emissions on its own to influence global climate change significantly; hence, the issue of global climate change is, by definition, a cumulative environmental impact.

Beginning in May 2017, the electricity source for Humboldt County transitioned to the Redwood Coast Energy Authority (RCEA) Community Choice Energy (CCE) program. The CCE program allows city and county governments to pool (or aggregate) the electricity demands of their communities in order to increase local control over electric rates, purchase power with higher renewable content, reduce greenhouse gas emissions, and reinvest in local energy infrastructure. The electricity continues to be distributed and delivered over the existing power lines by PG&E (RCEA, 2024). In 2022, the CCE program procured approximately 50 percent of its power from renewable sources (RCEA, 2022). In addition, customers can choose to opt up to a premium service called Repower+, which is 100 percent renewable energy at only $0.01 more per kilowatt hour (kWh) (RCEA, 2024). RCEA is pursuing the following procurement goals which will further increase the percentage of power from renewable resources for all of its customers – 100% carbon-free electricity by 2025 (RCEA Board goal adopted in 2019) and 100% local carbon-free electricity by 2030 (Board goal adopted in 2016) (RCEA, 2021).

Regulatory Framework

State

California passed Assembly Bill 32 (Global Warming Solutions Act) in 2006, mandating a reduction in GHG emissions and Senate Bill 97 in 2007, evaluating and addressing GHG under CEQA. On April 13, 2009, the Governor's Office of Planning and Research (OPR) submitted to the Secretary for Natural Resources its proposed amendments to the State CEQA Guidelines for GHG emissions, as required by Senate Bill 97 (Chapter 185) and they became effective March 18, 2010. As a result of these revisions to the CEQA Guidelines, lead agencies are obligated to determine whether a project's GHG emissions significantly affect the environment and to impose feasible mitigation to eliminate or substantially lessen any such significant effects.

The Global Warming Solutions Act (AB 32) also directed the California Air Resources Board (CARB) to develop the Climate Change Scoping Plan (Scoping Plan), which outlined a set of actions to achieve the AB 32 goal of reducing GHG emissions to 1990 levels by 2020, and to maintain such reductions thereafter. CARB approved the Scoping Plan in 2008 and first updated it in May 2014. The second update in November 2017 addressed the actions necessary to achieve the goal of reducing GHG emissions to 40 percent below 1990 levels by 2030, as described in Senate Bill 32 (SB 32). The most recent update in December 2022 addresses recent legislation that extends and expands upon these earlier plan updates with a target of reducing GHG emissions 85 percent below 1990 levels by 2045. The 2022 update also takes the unprecedented step of adding carbon neutrality as a science-based guide and touchstone for California's climate goals (CARB, 2022).

Local

The City is located in the North Coast Air Basin (NCAB) and is under the jurisdiction of the North Coast Unified Air Quality Management District (NCUAQMD). Neither Humboldt County nor the NCUAQMD have adopted quantitative thresholds for determining the significance of GHG emissions from land use projects in environmental documents. In addition, Humboldt County and the City of Blue Lake do not have adopted Climate Action Plans or GHG Reduction Plans.

Discussion

The Housing Element Update is a policy document that does not result in physical changes to the environment but encourages the provision of housing in areas of the City that are already designated and zoned to allow residential development. While policies could require amendments to the Zoning Code or result in actions of the City that could cause a physical change, the policies would not result in specific physical changes to the environment. Additionally, any amendments to the Zoning Code would be subject to project-specific environmental review pursuant to CEQA.

a-b) Less Than Significant Impact. The Housing Element Update does not provide specific development designs or development proposals, nor does it grant development entitlements. Additionally, the Housing Element Update would not allow housing in areas that are not already designated and zoned for residential development. Future residential development could result in an increase in GHG emissions during both construction and operational activities.

Future residential development in the City would be subject to a myriad of State and local regulations applicable to project design, construction, and operation that would reduce GHG emissions, increase energy efficiency, and provide compliance with the CARB Climate Change Scoping Plan (CARB, 2022). The State of California has the most comprehensive GHG regulatory requirements in the United States, with laws and regulations requiring reductions that affect project emissions. Legal mandates to reduce GHG emissions from vehicles, for example, reduce project-related vehicular emissions. Legal mandates to reduce per capita water consumption and impose waste management standards to reduce methane and other GHGs from solid wastes are all examples of mandates that reduce GHGs.

Existing regulations that would apply to any future residential development, including the California Green Building Standards Code and California's Title 24 Building Energy Efficiency Standards, would reduce GHG emissions associated with future residential projects. The Housing Element Update indicates that most of the residential development potential on vacant and likely developable sites is located within the City's Powers Creek District, which is zoned to require a mixture of residential and commercial uses. For example, the District is zoned to not allow residential-only development, in order to promote a beneficial mixture of residential and commercial uses. Land use regulations that promote infill and mixed-use development have the potential to reduce vehicle miles traveled and associated vehicular emissions including GHG emissions. Additionally, future residential development in the City will be provided increasingly renewable sources of energy from the RCEA CCE program, which would result in reductions in GHG emissions.

In compliance with existing laws and regulations, the Housing Element Update would result in a less than significant impact related to greenhouse gas emissions.

Hazards and Hazardous Materials

Would the project:	*Potentially Significant Impact*	*Less Than Significant With Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

Setting

There is limited industrial and commercial use in the City, so hazardous land uses and contaminated sites are not prevalent. The Powers Creek District was previously developed as a lumber mill and operated by the McIntosh Lumber Company, Inc. According to the information on the Department of Toxic Substances Control (DTSC) Envirostor Database, the former mill site does not contain known significant contamination

above regulatory screening levels and has received a determination from DTSC of "No Action Required" (DTSC, 2024). According to the State Water Resources Control Board (SWRCB) GeoTracker Database, there are eight leaking underground storage tank **(LUST)** sites in the City **limits**. These sites are primarily located in the downtown area and have all received determinations from the SWRCB of "Case Closed" (SWRCB, 2024). Explosives or dangerous chemicals are seldom transported throughout the area but an accidental spill or explosion on State Route 299 is a possibility.

The schools in the City include Blue Lake Union Elementary and the Dell'Arte International School of Physical Theatre. The closest airport to the City is the California Redwood Coast-Humboldt County Airport in McKinleyville, which is located approximately 8 miles northwest of the City.

Fire protection in Humboldt County is provided by local districts, cities, and the California Department of Forestry and Fire Protection (CAL FIRE, 2024a). The City limits are located in a Local Responsibility Area (LRA), which is served by the Blue Lake Volunteer Fire Protection District. Forestlands surrounding the City are in a State Responsibility Area (SRA) that is served by CAL FIRE. The closest fire station to the project site is the main station for the Volunteer Fire Protection District, which is near City Hall on First Avenue. The forestlands in this part of Humboldt County could be subject to wildfire and are classified by CAL FIRE as Moderate, High, and Very High Fire Hazard Severity Zones. The City limits and forestlands immediately surrounding the City are classified by CAL FIRE as being in a Moderate Fire Hazard Severity Zone (CAL FIRE, 2024).

Regulatory Framework

Hazardous materials management is regulated by federal and State regulations. The federal government enforces hazardous material transport pursuant to its interstate commerce regulation authority.

Federal

Resource Conservation and Recovery Act

The Department of Toxic Substances Control (DTSC), a Division of the California Environmental Protection Agency, acts to protect California from exposure to hazardous wastes by cleaning up existing contamination and looking for ways to reduce the hazardous waste produced in the state. The Department of Toxic Substances Control regulates hazardous waste in California primarily under the authority of the Federal Resource Conservation and Recovery Act, and the California Health and Safety Code. Other laws that affect hazardous waste are specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning. Any release or possible release of hazardous material must be reported to the California Governor's Office of Emergency Services (CalOES) Warning Center.

STATE

Unified Program and California Environmental Reporting System (CERS)

The California Environmental Protection Agency (CalEPA) oversees California's "Unified Program." The program protects Californians from hazardous waste and hazardous materials by ensuring local regulatory agencies consistently apply statewide standards when they issue permits, conduct inspections, and engage in enforcement activities.

The CalEPA Unified Program consolidates, coordinates, and makes consistent the administrative requirements, permits, inspections, and enforcement activities of six environmental and emergency response programs in California. These six programs (and their corresponding state oversight agencies) are:

- Hazardous Materials Release Response Plans and Inventories (Business Plans) - California Governor's Office of Emergency Services (CalOES)
- California Accidental Release Prevention (CalARP) Program - California Governor's Office of Emergency Services (CalOES)
- Underground Storage Tank (UST) Program - California State Water Resources Control Board (SWRCB)
- Aboveground Petroleum Storage Act (APSA) - Office of the State Fire Marshal (CAL FIRE-OSFM)
- Hazardous Waste Generator and Onsite Hazardous Waste Treatment (tiered permitting) Programs - DTSC
- California Uniform Fire Code: Hazardous Material Management Plans and Hazardous Material Inventory Statements - Office of the State Fire Marshal (CAL FIRE-OSFM)

The Humboldt County Division of Environmental Health is the local Certified Unified Program Agency (CUPA) that implements the CalEPA's Unified Program.

State Water Resources Control Board

The State Water Resources Control Board oversees hazardous materials that are stored in underground storage tanks. The Board addresses how those hazardous materials are stored and handled, as well as clean-up of any contamination created by leaking underground storage tanks. The Office of the State Fire Marshal oversees petroleum products that are stored in aboveground storage tanks.

The California Environmental Protection Agency certifies 81 local Certified Unified Program Agencies statewide to oversee the following hazardous materials programs:

- Area Plans for Hazardous Materials Emergencies
- California Accidental Release Prevention Program (CalARP)
- Hazardous Materials Release Response Plans and Inventories
- Hazardous Waste Generator and Onsite Hazardous Waste Treatment Programs
- Underground Storage Tank Program

Title 49 of the CFR lists thousands of hazardous materials, including gasoline, insecticides, household cleaning products, and radioactive materials. State-regulated substances that have the greatest probability of adversely impacting communities are listed in the Title 19 of the CCR.

LOCAL

Humboldt County Division of Environmental Health

As noted above, the Certified Unified Program Agency (CUPA) with regulatory authority over the City is the Humboldt County Division of Environmental Health. This agency helps businesses meet state

requirements for reporting hazardous materials and waste above certain designated quantities that they use, store, or handle at their facility. The California Environmental Reporting System is the statewide web-based system that supports the electronic exchange of required information among businesses, local governments and the U.S. Environmental Protection Agency (USEPA).

Discussion

The Housing Element Update is a policy document that does not result in physical changes to the environment but encourages the provision of housing in areas of the City that are already designated and zoned to allow residential development. While policies could require amendments to the Zoning Code or result in actions of the City that could cause a physical change, the policies would not result in specific physical changes to the environment. Additionally, any amendments to the Zoning Code would be subject to project-specific environmental review pursuant to CEQA.

a-d) Less Than Significant Impact. The Housing Element Update is a policy document and does not provide site-specific designs or development proposals, nor does it grant development entitlements. The Housing Element Update provides policies and programs designed to facilitate the construction and conservation of housing.

The construction of future residential development would require the temporary use and transport of paints, fuels, oils, solvents, and other chemicals used during construction activities. Improper use and transportation of hazardous materials could result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. These activities are controlled by County code provisions and State and federal regulations. Throughout the transport, use, or disposal of potentially hazardous materials, the contractor is required to employ standard cleanup and safety procedures to minimize the potential for public exposure from accidental releases of such substances into the environment. The operation of residential land uses is not typically associated with the routine transport, use, or disposal of hazardous materials. Residential uses may utilize cleaning products that contain toxic substances, but they are usually in low concentration and small in amount and would not pose a significant risk to humans or the environment during transport to and from or use at future residential development. As such, the Housing Element Update would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, there would be a less than significant impact in this regard.

Public schools in the City include the Blue Lake Union Elementary School. The construction and operation of residential land uses is not typically associated with the release of hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste. These types of impacts are typically generated by industrial uses including stationary sources that are subject to numerous State and federal regulations. Construction activity from future residential development may generate emissions in the form of diesel particulate matter and fugitive dust, but due to the short-term nature of construction activity, is not anticipated to result is adverse effects. Additionally, most of the residential

development potential identified in the Housing Element Update is located more than a quarter mile from the elementary school. Residential uses may utilize cleaning products that contain toxic substances, but they are usually in low concentration and small in amount and would not pose a significant risk to the school. Therefore, there would be a less than significant impact in this regard.

As discussed in the Setting, there are nine sites in the City **limits** that are on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. None of the sites are known to contain significant contamination ~~above regulatory screening levels~~ and have received determinations of either "No Action Required" or "Case Closed" by regulatory agencies including the DTSC and SWRCB (DTSC, 2024; SWRCB, 2024). **Additionally, none of the eight LUST sites in the City are identified in the site inventory in the Housing Element Update as a vacant site that can accommodate residential development.**

The Powers Creek District, where a majority of the residential development potential in the City is projected, was the location of the former McIntosh Lumber Mill. According to the DTSC Envirostor Database, the McIntosh Lumber Mill (Envirostor ID: 12240045) is listed as having a cleanup status of "No Action Required as of 8/8/1996". The rationale provided in the 'Site Evaluation Tracking Sheet' (dated 8/8/96) stated, "There is no documented evidence of release of contaminants at hazardous levels that threatens public health and/or the environment" (DTSC, 2024). The area identified in the Envirostor Database mapping is the property containing the former Calgon Carbon facility (APN: 025-161-010). The vacant sites in the District that are identified in the site inventory of the Housing Element Update are primarily in the area where the former mill log pond was located, which is a minimum of 700 feet to the northwest of the former Calgon Carbon site. Future residential development on the sites identified as vacant and likely developable **in the Powers Creek District** could potentially uncover unknown hazardous materials contamination during construction activities. **For this reason, any future development on these vacant sites will be required to implement a Soil and Groundwater Management Plan (SGMP) during construction activity. These types of plans are commonly prepared and implemented for development activity on former industrial sites. An SGMP typically includes a summary of planned development and earthwork, a summary of known and potential environmental conditions, and measures to address environmental impacts that may be encountered. The SGMP also includes provisions for health and safety, proper handling of soil, groundwater management measures, contingency measures, and construction best practices as they relate to potentially impacted soil and groundwater.** Based on the information available from prior site investigations and agency determinations, **and with implementation of SGMPs during construction activity on the vacant sites in the Powers Creek District,** ~~this~~ **future residential development** would not be considered to pose a significant risk to humans or the environment. Therefore, impacts would be less than significant in this regard.

e) No Impact. The proposed project is not within two miles of an airport or within an airport land use plan. The closest airport to the City is the California Redwood Coast-Humboldt County Airport in McKinleyville, which is located approximately 8 miles northwest of the City. Therefore, there would be no impact in this regard.

f-g) Less Than Significant Impact. The City is included in the Humboldt County Emergency Operations Plan and the Humboldt County Operational Area Hazard Mitigation Plan. There are multiple routes for access in and out of the City that could be used for emergency evacuations including Blue Lake Boulevard, Hatchery Road/West End Road, Maple Creek Road, Glendale Drive, and State Route 299. The City's designated industrial truck route (Greenwood Avenue, Railroad Avenue, and Hatchery Road) is the main artery roadway through the City that would serve most future residential development identified in the Housing Element Update. According to recent traffic counts, the traffic volumes on Greenwood Avenue are well below its design capacity and it currently operates at an acceptable level of service of C or better (W-Trans, 2023). Future residential development may require new access roads and driveways to development sites that will require review by the Public Works Department, Engineering Department, and Volunteer Fire Protection District to ensure that they comply with applicable design standards for emergency access including, but not limited to, lane widths, road surfaces, vertical clearance, brush clearance, and allowable grades. Based on the projected buildout identified on vacant and likely developable sites in the site inventory of the Housing Element Update (89 units; see Table 21 in Housing Element Update; City of Blue Lake, 2024b), it is not anticipated that future residential development in the City would impair implementation of or physical interference of an adopted emergency response plan or emergency evacuation plan. Therefore, there would be a less than significant impact in this regard.

Fire protection in Humboldt County is provided by local districts, cities, and the California Department of Forestry and Fire Protection (CAL FIRE). The City limits are located in a Local Responsibility Area (LRA), which is served by the Blue Lake Volunteer Fire Protection Districct. Forestlands surrounding the City are in a State Responsibility Area (SRA), which is served by CAL FIRE. The closest fire station to the project site is the main station for the Volunteer Fire Protection District, which is near City Hall on First Avenue. The forestlands in this part of Humboldt County could be subject to wildfire and are classified by CAL FIRE as Moderate, High, and Very High Fire Hazard Severity Zones. The City limits and forestlands immediately surrounding the City are classified by CAL FIRE as being in a Moderate Fire Hazard Severity Zone (CAL FIRE, 2024).

The sites identified as vacant and likely developable in the site inventory of the Housing Element Update do not exhibit topography, vegetation patterns, or other factors (for example, fuels, aspect, etc.) that would expose future residents or structures to a significant risk of wildland fires. The City's proximity to State Route 299 and the number of access points in and out of the City provide adequate access and response in an emergency situation. Future residential development would be consistent with existing land uses in the City and would not exacerbate wildfire risks. Therefore, a less than significant impact would occur in this regard.

Hydrology and Water Quality

Would the project:	*Potentially Significant Impact*	*Less Than Significant With Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in a substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Setting

The City of Blue Lake is situated in the Mad River Valley. The Mad River borders the City on the south and west. A historic lake, for which the City was named, is now a small freshwater marsh of about 3.5 acres on private property on the southern edge of town. A levee along the Mad River on the southern edge of the City

has successfully contained past flooding and it is expected to withstand a 100-year storm event. Powers Creek runs from the northeast through the center of town to the southwest. The lower creek channel remains dry in the summer but floods, to varying degrees, every winter. Flooding occurs in the area north of the railroad but most of the bank overflow occurs between the railroad and the Mad River, where the flood plain spreads out. Some residences in the lower reach have been affected by flooding and various efforts to clean out the brush and debris in the creek have been undertaken in the past. Water table levels in the City have been observed to fluctuate as a function of changing river stage and precipitation.

The Humboldt Bay Municipal Water District (HBMWD) obtained the lands in the Ruth Valley to create a reservoir in the 1960s to allow for water storage and recreational opportunities, creating the Ruth Lake reservoir in Trinity County and constructing a dam on the Mad River (R.W. Matthews Dam; HBMWD, 2024). The HBMWD is the main supplier of water to the Humboldt Bay Region and draws water from the unconfined Holocene River Channel Deposits aquifer at a depth of 60 to 90 feet below the bed of the Mad River through Ranney wells situated in or in close proximity to the Mad River. Water is extracted from this aquifer instead of directly from the river since percolation through surface ground layers help to naturally filter water and improve quality of the drinking water supply. The HBMWD Groundwater Management Plan indicates that groundwater recharge is achieved by inundation of the recharge areas in the Mad River channel through the District's operation of Matthews Dam and Ruth Lake. As a result, additional development in the Humboldt Bay Region would not have a direct impact on the volume of groundwater available to HBMWD. Additionally, the HBMWD has indicated that there is sufficient supply for currently forecasted development (City of Eureka, 2018). The City is under contract with the HBMWD for its domestic water supply, which would serve future residential development. The City's water system includes two redwood water storage tanks, transmission mains, fire hydrants, valves, and the individual water lines from the mains to individual water meters.

The Matthews Dam Emergency Action Plan (EAP) analyzes the worst-case flood scenario from failure of the R.W. Matthews Dam. This would occur if the maximum recorded flood (1964) and the failure of the dam combined together into one catastrophic flood. In this situation, the sites identified as vacant and likely developable in the site inventory of the Housing Element Update would experience flooding (City of Blue Lake, 2004). According to Federal Emergency Management Authority (FEMA) FIRM Panel No. 06023C0713F, except for parcel 025-141-007, the sites identified as vacant and likely developable in the site inventory of the Housing Element Update are located outside of a mapped special flood hazard zone (FEMA, 2016). The Tsunami Hazard Area Map from the California Geological Survey (CGS) shows the City as being located outside of a tsunami hazard zone (CGS, 2024). There is no body of water near the City that has the potential for the generation of a seiche.

Regulatory Framework

FEDERAL

Clean Water Act (CWA)
The CWA (33 USC §1251-1376), as amended by the Water Quality Act of 1987, is the major federal legislation governing water quality and was established to "restore and maintain the chemical, physical, and biological integrity of the Nation's waters." Pertinent sections of the Act are as follows:

1. Sections 303 and 304 provide for water quality standards, criteria, and guidelines.
2. Section 401 (Water Quality Certification) requires an applicant for any federal permit that would authorize a discharge to waters of the United States to obtain certification from the state that the discharge will comply with other provisions of the Act.
3. Section 402 establishes the National Pollution Discharge Elimination System (NPDES), a permitting system for the discharge of any pollutant (except for dredged or fill material) into waters of the United States. This permit program is administered by the State Water Resources Control Board (SWRCB) and is discussed in detail below.
4. Section 404, jointly administered by the U.S. Army Corps of Engineers (USACE) and U.S. Environmental Protection Agency (USEPA), establishes a permit program for the discharge of dredged or fill material into waters of the United States.

Federal Anti-Degradation Policy
The federal Anti-Degradation Policy is part of the CWA (Section 303(d)) and is designed to protect water quality and water resources. The policy directs states to adopt a statewide policy that protects designated uses of water bodies (for example, fish and wildlife, recreation, water supply, etc.). The water quality necessary to support the designated use(s) must be maintained and protected.

Safe Drinking Water Act
Under the 1974 Safe Drinking Water Act, most recently amended in 1996, USEPA regulates contaminants of concern to domestic water supply, which are those that pose a public health threat or that alter the aesthetic acceptability of the water. These types of contaminants are classified as either primary or secondary Maximum Contaminant Levels (MCLs). MCLs and the process for setting these standards are reviewed triennially.

Federal Emergency Management Agency (FEMA)
FEMA is responsible for mapping flood-prone areas under the National Flood Insurance Program (NFIP). Communities that participate in the NFIP are required to adopt and enforce a floodplain management ordinance to reduce future flood risks related to new construction in a flood hazard area. In return, property owners have access to affordable federally-funded flood insurance policies.

National Pollution Discharge Elimination System (NPDES)
Under Section 402(p) of the CWA, the USEPA established the NPDES to enforce discharge standards for both point-source and non-point-source pollution. Dischargers can apply for individual discharge permits, or apply for coverage under the General Permits that cover certain qualified dischargers. Point-source discharges

include municipal and industrial wastewater, stormwater runoff, combined sewer overflows, sanitary sewer overflows, and municipal separate storm sewer systems. NPDES permits impose limits on discharges based on minimum performance standards or the quality of the receiving water, whichever type is more stringent in a given situation.

STATE

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act (California Water Code §13000 et seq.) is the principal law governing water quality regulation in California. It establishes a comprehensive program to protect water quality and the beneficial uses of waters of the State. The Porter-Cologne Water Quality Control Act applies to surface waters, wetlands, and groundwater, and to both point and non-point sources of pollution. The Act requires a Report of Waste Discharge for any discharge of waste (liquid, solid, or otherwise) to land or surface waters that may impair a beneficial use of surface or groundwater of the state. The RWQCBs enforce waste discharge requirements identified in the Report.

State Anti-Degradation Policy

In 1968, as required under the Federal Anti-Degradation Policy, the SWRCB adopted an Anti-Degradation Policy, formally known as the Statement of Policy with Respect to Maintaining High Quality Waters in California (State Water Board Resolution No. 68-16). Under the Anti-Degradation Policy, any actions that can adversely affect water quality in surface or ground waters must be consistent with the maximum benefit to the people of the State, not unreasonably affect present and anticipated beneficial use of the water, and not result in water quality less than that prescribed in water quality plans and policies.

National Pollution Discharge Elimination System

Pursuant to the federal CWA, the responsibility for issuing NPDES permits and enforcing the NPDES program was delegated to the SWRCB and the nine Regional Water Quality Control Boards (RWQCBs). NPDES permits are also referred to as waste discharge requirements (WDRs) that regulate discharges to waters of the United States.

Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act (SGMA), enacted in September 2014, established a framework for groundwater resources to be managed by local agencies in areas designated by the Department of Water Resources as “medium” or “high” priority basins. Basins were prioritized based, in part, on groundwater elevation monitoring conducted under the California Statewide Groundwater Elevation Monitoring program.

The SGMA required local agencies in medium- and high-priority basins to form Groundwater Sustainability Agencies by July 1, 2017, and be managed in accordance with locally-developed Groundwater Sustainability Plans (GSPs). Critically over-drafted basins were to be managed under a GSP by January 31, 2020. All other medium- and high-priority basins were to be managed under a GSP by January 31, 2022.

LOCAL

Future development on any sites identified for residential development in the Housing Element Update will be required to comply with all relevant General Plan policies including:

Land Use Element - Environmental Protection Policies:

Policy 4 The City shall encourage site design that maximizes onsite retention of stormwater and minimizes discharge to the City's stormwater system.

Land Use Element - Powers Creek Management Policies:

Policy 1 Powers Creek shall be managed to maintain the creek as a scenic and natural resource, and to protect adjacent properties and structures to the greatest degree possible.

Policy 7 The various wetland areas throughout the City shall be maintained as a scenic and habitat resource, and to prevent flooding impacts due to the modification of existing hydrology.

Discussion

The Housing Element Update is a policy document that does not result in physical changes to the environment but encourages the provision of housing in areas of the City that are already designated and zoned to allow residential development. While policies could require amendments to the Zoning Code or result in actions of the City that could cause a physical change, the policies would not result in specific physical changes to the environment. Additionally, any amendments to the Zoning Code would be subject to project-specific environmental review pursuant to CEQA.

a-e) Less Than Significant Impact. The Housing Element Update does not include site-specific design or development proposals, nor does it permit development entitlements. All future development within the City would be required to comply with federal, State, and local regulations intended to protect water quality and ensure compliance with waste discharge requirements. At the local level, Municipal Code Chapter 15.12 (Grading, Erosion, and Sediment Control) contains grading, sediment control, and revegetation standards as well as standards for the protection of watercourses and drainage inlets that must be complied with during all grading or other land-disturbing activities. For projects that will disturb more than one-acre during construction, a Construction General Permit (CGP) will be required to be obtained from the SWRCB, which requires the preparation of a Stormwater Pollution Prevention Plan (SWPPP) that documents the stormwater dynamics at the site, the best management practices (BMPs) and water quality protection measures that will be used, and the frequency of inspections to ensure compliance with water quality standards. During operation, residential land uses have a limited potential to result in water quality impacts relative to more intensive and impactful land uses. All future residential development would be connected to the City's wastewater treatment system, which would prevent potential water quality impacts related to the use of onsite wastewater treatment systems. In compliance with existing laws and regulations protecting water quality, the Housing Element Update would result in a less than significant impact in this regard.

The City's daily water use allotment is currently 400,000 gallons, established via the contract with HBMWD. Currently, the City reports that the average water use during peak use months is approximately 150,000 gallons per day (gpd), 38% of the daily allotment from HBMWD. Based on the City's current population of 1,149 residents as estimated by the California Department of Finance (DOF, 2024), daily per capita water use is conservatively estimated to be approximately 131 gallons per day (gpd) based on the peak use months noted above (150,000 gallons). The HBMWD draws water from the unconfined Holocene River Channel Deposits aquifer at a depth of 60 to 90 feet below the bed of the Mad River through Ranney wells situated in or in close proximity to the Mad River. Water is extracted from this aquifer instead of directly from the river since percolation through surface ground layers help to naturally filter water and improve quality of the drinking water supply. The amount of water supplied to the City under existing conditions is less than 1 percent of the annual yield of the Mad River. The HBMWD Groundwater Management Plan indicates that groundwater recharge is achieved by inundation of the recharge areas in the Mad River channel through the District's operation of Matthews Dam and Ruth Lake. As a result, additional residential development within the City would not have a direct impact on the volume of groundwater available to HBMWD. Additionally, the HBMWD has indicated that there is sufficient supply for currently forecasted development in the Humboldt Bay Region. Additionally, the HBMWD is required to comply with the applicable requirements intended to protect and preserve groundwater and groundwater recharge including its Groundwater Management Plan (City of Eureka, 2018). Therefore, the Housing Element Update would result in a less than significant impact in this regard.

The sites identified as vacant and likely developable in the site inventory of the Housing Element Update, with the exception of parcel 025-141-007, would not have the potential to alter the course of stream or river. Any future projects that would propose direct physical impacts to a stream or river would be required to obtain permits and comply with federal and State regulations including site-specific environmental review pursuant to CEQA and the National Environmental Policy Act (NEPA). Future residential development will create new impervious surfaces and has the potential to increase the volume and rate of surface runoff, which could result in erosion, siltation, and localized flooding on- or off-site and potentially exceed the capacity of the City's existing stormwater system. All development will be required to comply with the City's grading, sediment control, and revegetation standards in Municipal Code Chapter 15.12 (Grading, Erosion, and Sediment Control). These standards would minimize erosion and siltation during construction and operation of future residential land uses. Although the City is not within a Phase II MS4 Permit area, the Public Works and Engineering Departments can require the onsite management of stormwater runoff if it is determined that a project has the potential to exceed the capacity of the City's stormwater system. This is typically required for larger projects with greater areas of impervious surface as conditions of a discretionary permit or building permit. In compliance with the requirements of Municipal Code Chapter 13.20 (Floodplain Management), it is not anticipated that future residential development would impede or redirect flood flows. Any development proposed within a mapped special flood hazard area or area subject to regular inundation from flood waters, would be required to be placed above or outside of the flood zone. In compliance with existing laws and regulations, the Housing Element Update would result in a less than significant impact in this regard.

According to FEMA FIRM Panel No. 06023C0713F, with the exception of parcel 025-141-007, the sites identified as vacant and likely developable in the site inventory of the Housing Element Update are located outside of a mapped special flood hazard area (FEMA, 2016). As noted above, future development proposed within a mapped special flood hazard area, would be required to be placed above or outside of the flood zone, which would minimize the potential for the release of pollutants due to inundation. This would also reduce potential impacts related to inundation in the unlikely event of the failure of R.W. Matthews Dam. The Tsunami Hazard Area Map from the California Geological Survey (CGS) shows the City as being located outside of a tsunami hazard zone (CGS, 2024). There is no body of water near the City that has the potential for the generation of a seiche. Therefore, the Housing Element Update would result in a less than significant impact related to the release of pollutants due to inundation.

As discussed above, future residential development in the City must comply with federal, State, and local regulations pertaining to the protection of water quality and groundwater supply. As such, it is not anticipated that the Housing Element Update would result in conflict with a water quality control plan or groundwater management plan. Therefore, impacts would be less than significant in this regard.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Land Use and Planning

Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect	☐	☐	☐	☒

Setting

The City of Blue Lake is located in northern Humboldt County in the Mad River Valley. It is inland of the Humboldt Bay area along State Route 299. Though founded years earlier, the City was incorporated in 1910 and has a current estimated population of 1,149 living in an area of about 0.6 square miles (416 acres; DOF, 2024). It is governed by a five-member city council whose members are elected at large.

The City limits are bordered to the north and east by forested hillsides, to the south and west by the Mad River, and to the west by the Blue Lake Rancheria. Development in the City primarily consists of single-family residential development with commercial uses, public facilities, and apartments in the downtown, and industrial, light industrial, and commercial uses in the Powers Creek District (former Industrial Park and Business Park).

The most sizable annexations to the City occurred during the 1980s consistent with the City's General Plan. This included an annexation in 1983 to expand the former Blue Lake Industrial Park (currently Powers Creek District) to support the construction of an 11-megawatt biomass power plant. After approval of this annexation and power plant construction, an additional 124.5 acres was annexed to the City in 1984. The City also assumed responsibility for maintaining the western portion of the Mad River Levee at this time. In 1985, Blue Lake annexed 8.76 acres to incorporate some of the wastewater treatment plant that was outside City limits. In 1986, the City annexed the site of their 500,000-gallon water storage tank for purposes of management and control (Humboldt LAFCo, 2019).

The last major update of the City's General Plan occurred in the mid-1980s. At that time, the City planned for: A) the revitalization of its downtown; B) replacement of the former McIntosh Mill with an Industrial Park, C) multi-family development adjacent to the downtown and along eastern Railroad Avenue; and D) a creative approach to residential development on the western portion of the City to allow clustering of development in areas without environmental constraints (for example, wetlands, drainages, etc.). Since that time, the City has completed incremental updates to the General Plan, primarily with grant funding, based on input from community visioning processes, changes in community sentiment regarding industrial development (Industrial Park transitioned to Business Park), and changes in State law. This has included several updates of

the General Plan Housing Element to achieve compliance with State housing law. The most recent update to the General Plan was amendment of the Land Use Element in 2021 to plan for mixed-use development in the newly rebranded Powers Creek District (former Industrial Park and Business Park) and incorporate sustainable development policies into the Element. This amendment included the creation and adoption of the Opportunity (O) zone, which allows a combination of residential, commercial, and light manufacturing uses in order to promote a beneficial mixture of residential and commercial uses. As part of this amendment, the O zone was applied to portions of the Powers Creek District, which shifted the focus for residential development from the western portion of the City to the District. As discussed in other sections of this document, the site inventory in the Housing Element Update identifies the Powers Creek District and O zone as containing the majority of residential development potential in the City.

Regulatory Framework

Local

Future development on any sites identified for residential development in the Housing Element Update will be required to comply with all relevant General Plan policies including:

Land Use Element - Character Policies:

Policy 1 All densities shall be considered with respect to the general density of the City and the neighborhood concerned.

Policy 6 The City should encourage development of property in accordance with general density and rural character.

Policy 9 Congruous and compatible development shall be encouraged.

Land Use Element – Siting Density Policies:

Policy 1 All types of dwelling units shall be placed on their sites so as to provide adequate useable outdoor living area. Building sites shall be considered with respect to the location of other buildings, streets, terrain, and to other elements of the environment.

Policy 2 The City should in approving residential development, require sufficient area to allow open space for each dwelling unit consistent with quality of the rural setting of Blue Lake.

Policy 3 Planned Unit Development, clustering, and other innovative development design techniques shall be encouraged, where feasible, to maximize open space and allow flexibility in design.

Land Use Element - Multi-Use Development Policies:

Policy 1 Residential uses allowed in commercial areas shall be located and operated in a manner that does not detract from the commercial activities or character of the area. Such uses shall be located on the upper floors or in the portion of the structure away from the street or main entrance.

Policy 2 The City should encourage incidental residential use of portions of commercial structures when other City requirements can be met onsite.

Discussion

The Housing Element Update is a policy document that does not result in physical changes to the environment but encourages the provision of housing in areas of the City that are already designated and zoned to allow residential development. While policies could require amendments to the Zoning Code or result in actions of the City that could cause a physical change, the policies would not result in specific physical changes to the environment. Additionally, any amendments to the Zoning Code would be subject to project-specific environmental review pursuant to CEQA.

a-b) No Impact. The site inventory in the Housing Element Update only identifies sites as vacant and likely developable that are already designated and zoned for residential use. Development of the sites in the site inventory would be considered infill development as these sites are surrounded by existing development. Therefore, the Housing Element Update would encourage the development of housing on vacant sites in the City and would not divide an established community.

The Housing Element Update does not provide specific development designs or development proposals, nor does it grant development entitlements. The Housing Element Update plans for residential development that is consistent with the requirements of the General Plan, Zoning Code, and State housing law. Future development proposals would be reviewed by the City to ensure compliance with applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect.

As discussed in the Project Description in Section 1, the proposed project would involve amending the City's Zoning Code to create a Multi-Family Combining Zone to allow multi-family projects without discretionary review or by-right at a density of 16 units per acre or 1 unit per 2,722.5 square feet of lot area (City of Blue Lake, 2024b; see Implementation Program HI-14). Due to the availability of adequate sites with limited constraints within the City where the combining zone could be applied during the 6th cycle planning period, the combining zone is anticipated to be applied to a property in the City's Powers Creek District that is zoned Opportunity (O) and already allows for residential development. It should be noted that the combining zone would not result in a higher density than is already allowed by the O zone, which allows for 1 unit per 2,500 square feet or 17.4 units per acre. To meet the requirement for by-right zoning in Government Code Section 65583.2, subdivisions (h) and (i), the property would need to be sufficiently sized to allow a capacity of at least 11 units, which would be a minimum of 27,500 square feet (~0.63-acres) at the residential density allowed in the O zone (1 unit per 2,500 square feet of lot area). Any by-right project proposed on a property where the combining zone has been applied would not be subject to CEQA. However, any amendments to the Zoning Code would be subject to environmental review pursuant to CEQA.

Therefore, the Housing Element Update would have no impact related to physically dividing an established community or conflict with a land use plan, policy, or regulation for the purpose of avoiding or mitigating an environmental effect.

	Potentially Significant Impact	*Less Than Significant With Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*

Mineral Resources

Would the project:				
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Setting

A mineral resource is land on which known deposits of commercially viable mineral or aggregate deposits exist. The designation is applied to sites determined by the State Division of Mines and Geology as being a resource of regional significance and is intended to help maintain any quarrying operations and protect them from encroachment of incompatible uses. The Mad River, which runs along the southern and western boundary of the City, contains sand and gravel resources that are mined annually. Additionally, there are several quarries that exist in the Mad River Valley area.

Regulatory Framework

State

The Surface Mining and Reclamation Act (SMARA; PRC Chapter 9, Division 2) provides a comprehensive surface mining and reclamation policy to ensure that adverse environmental impacts are minimized and mined lands are reclaimed to a usable condition. Mineral Resource Zones (MRZs) are applied to sites determined by the California Geological Survey (CGS) as being a resource of regional significance and are intended to help maintain mining operations and protect them from encroachment of incompatible uses.

Discussion

The Housing Element Update is a policy document that does not result in physical changes to the environment but encourages the provision of housing in areas of the City that are already designated and zoned to allow residential development. While policies could require amendments to the Zoning Code or result in actions of the City that could cause a physical change, the policies would not result in specific physical changes to the environment.

a-b) No Impact. There are no known important mineral resources on the sites identified as vacant and likely developable in the site inventory in the Housing Element Update. As such, it is not anticipated that future

residential development will result in the loss of availability of important mineral resources. Therefore, no impacts would occur in this regard.

Noise

Would the project result in:	*Potentially Significant Impact*	*Less Than Significant With Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive ground borne vibration or ground borne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Setting

The City of Blue Lake is located in northern Humboldt County in the Mad River Valley. It is inland of the Humboldt Bay area along State Route 299. The City limits are bordered to the north and east by forested hillsides, to the south and west by the Mad River, and to the west by the Blue Lake Rancheria. Development in the City primarily consists of single-family residential development with commercial uses, public facilities, and apartments in the downtown, and industrial, light industrial, and commercial uses in the Powers Creek District (former Industrial Park and Business Park).

The primary sources of noise in the City include transportation noise from State Route 299 and local streets, industrial and manufacturing activity in the Powers Creek District, and construction activity. State Route 299 runs along the northern edge of the City and is considered ambient noise. State Route 299 does not cause high ambient noise levels because it is elevated above the City and the sound is either prevented from projecting by roadside banks or it projects out over the town and diminishes rapidly along the ground. Traffic volume on local streets is low enough that traffic represents single noise events rather than ambient noise. Heavy truck traffic and construction activity generate most high single noise events in the City. In 1975, when the City adopted its General Plan Noise Element, noise issues in the City were identified as heavy truck traffic on local streets and trains on the Arcata and Mad River Railroad (City of Blue Lake, 1975).

The City is not located within two miles of a private airstrip or public use airport. The closest airport to the City is the California Redwood Coast-Humboldt County Airport in McKinleyville, which is located approximately 8 miles northwest of the City.

Regulatory Framework

There are several methods of characterizing sound. The standard unit of sound level measurement is the decibel, which is represented by dB. The decibel system of measuring sound gives a rough correlation of the intensity of sound and its perceived loudness to the human ear. Unlike linear measurement units such as inches or pounds, decibels are measured using a logarithmic scale. On a logarithmic scale, a ten dB increase is ten times more intense than a one dB increase, and an additional 20 dB increase would be 100 times more intense. Noise measurements are usually based on the range of sound frequencies, which most human ears can hear, called the "A-weighted" scale; as a result, most measurements are reported as "dBA."

Local

The City of Blue Lake has adopted noise standards that regulate noise levels for the protection of sensitive receptors. The noise standards are in Municipal Code Section 17.24.280 (Noise Standards). The Municipal Code stipulates construction activity be limited to the hours of 8:00 am to 6:00 pm Monday through Friday, 9:00 am to 5:00 pm on Saturdays, and does not allow heavy equipment-related construction activities (for example, demolition grading, pile-driving, paving etc.) on Sundays and holidays (City of Blue Lake, 2024a). **Table 5** defines the maximum allowable noise level by receiving land use type, as required by Municipal Code Section 17.24.280(C)(3).

Table 5. Maximum Allowable Noise Level by Receiving Land Use.

Noise Level Descriptor	Maximum Exterior Noise Level			Maximum Interior Noise Level		
	7 am - 7 pm	7-10 pm	10 pm - 7 am	7 am - 7 pm	7-10 pm	10 pm – 7 pm
Dwellings, Transient Lodging, Hospitals, Extended Care, and Similar Uses						
Hourly Leq[1]	55 dBA	50 dBA	45 dBA	45 dBA	40 dBA	35 dBA
Meeting Facilities, Auditoriums, Theaters, Libraries, Schools, and Similar Uses						
Hourly Leq[1]	55 dBA	55 dBA	n/a	40 dBA	40 dBA	n/a

[1] Leq means the equivalent continuous sound level in decibels, equivalent to the total sound energy measured over a stated period of time. Hourly Leq means the equivalent continuous sound level in decibels over one hour.

Residential land uses are considered a sensitive receptor for noise. If future residential development is in an elevated noise environment (for example, near industrial operations or major roadways), applicants would be required to conduct exterior and interior noise analysis to ensure future occupants are not subject to noise levels in excess of the standards in **Table 5**. If it is determined that noise levels will exceed the noise standards, then effective noise mitigation measures must be incorporated into the project design pursuant to Municipal Code Section 17.24.280(C)(4).

Discussion

The Housing Element Update is a policy document that does not result in physical changes to the environment but encourages the provision of housing in areas of the City that are already designated and zoned to allow residential development. While policies could require amendments to the Zoning Code or result in actions of the City that could cause a physical change, the policies would not result in specific physical changes to the environment. Additionally, any amendments to the Zoning Code would be subject to project-specific environmental review pursuant to CEQA.

a-b) Less Than Significant Impact. The Housing Element Update does not provide specific development designs or development proposals, nor does it grant development entitlements. The Housing Element Update plans for residential development that is consistent with the requirements of the General Plan, Zoning Code, and State housing law. Future residential development has the potential to generate noise during both construction and operation. As noted under the Regulatory Framework discussion, Municipal Code Section 17.24.280 (Noise Standards) places limitation on the hours and days of construction activity, which would minimize potential noise impacts to sensitive receptors in the City. During operation, residential land uses are typically considered sensitive receptors for noise. As such, it is not anticipated that future residential development would result in substantial increases in noise levels in the City. If future residential development is proposed to be located in an elevated noise environment (for example, near industrial operations or major roadways), applicants would be required to conduct exterior and interior noise analysis to ensure future occupants are not subject to noise levels in excess of the standards in Section 17.24.280. Additionally, if new noise-generating land uses are developed near existing residential uses, they would be required to meet the noise standards in Section 17.24.280 at the property line of those residential uses (City of Blue Lake, 2024a). As such, the Housing Element Update would not generate substantial increases in ambient noise levels in excess of applicable standards. Therefore, there would be a less than significant impact in this regard.

During the construction of future residential development, there is the potential to generate groundborne vibration and noise from the use of heavy equipment. Ground vibrations from construction activities do not often reach levels that can damage structures. Pile-driving generates the highest levels of vibration; however, pile-driving is not anticipated to be a common construction method used for future residential development in the City. With respect to the impacts of vibration on persons, vibration from future construction activity would be of short duration and would occur during daytime hours, when residents are less likely to be home. As noted above, Municipal Code Section 17.24.280 (Noise Standards) places limitation on the hours and days of construction activity, which would also minimize the potential impacts of vibration on residents near the future development sites. In compliance with the City's noise standards, the Housing Element Update would not generate excessive groundborne vibration or groundborne noise levels. Therefore, there would be a less than significant impact in this regard.

c) No Impact. The City is not located within two miles of a private airstrip or public use airport. The closest airport to the City is the California Redwood Coast-Humboldt County Airport in McKinleyville, which is located approximately 8 miles northwest of the City. Therefore, there would be no impact related to airport noise.

	Potentially Significant Impact	*Less Than Significant With Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*

Population and Housing

Would the project result in:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Setting

The Housing Element Update is a policy level document that plans for the City's share of the housing need in Humboldt County during the 6th housing element planning cycle (2019-2027). Housing needs are largely determined by population. Blue Lake's population decreased from 1,253 in 2010 to 1,149 in 2024 (U.S. Census Bureau, 2010; DOF, 2024), which is an 8.3 percent decrease in population. Over the same time period, the Humboldt County population decreased from 134,623 in 2010 to 133,100 in 2024, which is an 11.3 percent decrease in population. According to the California Department of Finance (DOF), the City of Blue Lake is estimated to have 570 housing units in 2024 and the total number of units in the County is estimated to be 63,397 (DOF, 2024).

As noted in **Table 1**, the Regional Housing Needs Allocation (RHNA) that is planned for in the Housing Element Update is 34 units, which includes the RHNA from both the 5th and 6th housing element planning cycles. As noted in **Table 2**, the site inventory in the Housing Element Update estimates that the development potential on the sites identified as vacant and likely developable is 89 units.

Discussion

The Housing Element Update is a policy document that does not result in physical changes to the environment but encourages the provision of housing in areas of the City that are already designated and zoned to allow residential development. While policies could require amendments to the Zoning Code or result in actions of the City that could cause a physical change, the policies would not result in specific physical changes to the environment. Additionally, any amendments to the Zoning Code would be subject to project-specific environmental review pursuant to CEQA.

a) Less Than Significant Impact. The site inventory in the Housing Element Update only identifies sites as vacant and likely developable that are already designated and zoned for residential use. Development of the sites in the site inventory would be considered infill development as these sites are surrounded by existing development and can be served by existing utilities and infrastructure.

Based on the estimated number of persons per household in the City (2.12 persons per household; DOF, 2024), development of the RHNA allocation of 34 units is estimated to result in a population increase of approximately 72 residents. This would be a 6.3 percent increase in population and a 6 percent increase in the number of total housing units. If all the vacant and likely developable sites listed in the site inventory of the Housing Element Update were developed as estimated in **Table 2** (89 total units), this could result in an estimated population increase of approximately 189 residents. This would be a 16.4 percent increase in population and a 15.6 percent increase in the total number of housing units.

Since the Housing Element Update plans for development on sites that are already designated and zoned for residential development, the Update would not result in substantial unplanned population growth in the City. Future residential development would be served by existing utilities and infrastructure and would be consistent with the projected growth in the City's General Plan. Therefore, the Housing Element Update would result in a less than significant impact in this regard.

b) No Impact. The Housing Element Update plans for residential development on sites that are vacant and encourages the preservation of existing housing in the City. Therefore, the Housing Element Update would not displace substantial numbers of existing people or housing. Therefore, no impact would occur in this regard.

	Potentially Significant Impact	*Less Than Significant With Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*

Public Services

Would the project result in:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
i) Fire protection	☐	☐	☒	☐
ii) Police protection	☐	☐	☒	☐
iii) Schools?	☐	☐	☒	☐
iv) Parks?	☐	☐	☒	☐
v) Other public facilities				

Setting

Fire Protection

The Blue Lake Fire Protection District, a volunteer organization, provides fire protection within the Blue Lake planning area from headquarters located at 111 1st Avenue in Blue Lake. The Blue Lake Fire Protection District currently has 13 active volunteer fire fighting personnel on its roster. The Fire Protection District maintains a full array of response vehicles, including two Type 1 engines, a Type 3, a rescue unit, two water tenders, and two utility response vehicles. Firefighters are trained and equipped to provide structure, wildland and medical response services. The Fire District employs a full-time, paid Chief that oversees the daily operations of the department (A. Mager, personal communication, September 17, 2024). The BLFPD participates in the countywide mutual aid agreement and has an automatic aid agreement with the Arcata Fire Protection District (AFPD), where both districts are dispatched to fires and other major emergency calls in Blue Lake and the Valley West area of Arcata (Humboldt LAFCo, 2019).

Police Department

The City of Blue Lake contracts with the Humboldt County Sheriff Department for law enforcement services. The contract with the Sheriff Department facilitates the full spectrum of police services, including 24/7 call and response services and related auxiliary services such as investigative, community services, criminalistics, supervisorial, and traffic service functions. Support services include records management, dispatch services, and property/evidence services. The contract provides services at a level not less than that provided by the Sheriff in adjacent areas in the County (City of Blue Lake, 2024c).

Schools

Public schools in the City include the Blue Lake Union Elementary School, which is located on Greenwood Avenue and enrolls students from transitional kindergarten to eighth grade. The Blue Lake Union Elementary School District serves students within and outside the City limits. Their services are supplemented by various private schools and programs conducted by the Office of Education. The current capacity of the elementary school is 300 students, and the current enrollment is approximately 150 students (D. Waldvogel, personal communication, September 17, 2024).

Parks and Recreational Facilities

City standards concerning parkland require that there be at least 3 acres of parkland per 1,000 residents and were enacted pursuant to Govt. Code Section 66477. The City currently has approximately 9 acres of parks and recreational facilities. As of 2024, 570 households and a population of 1,149 residents were serviced by the 4 park and recreational facilities in Blue Lake, which includes Perigot Park, The Tot Lot, the Town Square, and the rodeo grounds (DOF, 2024). The City's recreation program includes numerous recreation programs, including a public skate program, a trail network, two baseball/softball fields, as well as a dog park and a yearly Summer and break camp program. The City is in the process of building a new bike park and routinely facilitates recreation events, including the Mad River Enduro Bike Race and the Blue Lake Elementary All-Schools Cross Country Event (A. Mager, personal communication, September 17, 2024).

Other Public Facilities

There are two hospitals within the Humboldt Bay Region that provide medical services: 1) Mad River Hospital in Arcata, and 2) St. Joseph's Hospital in Eureka. The City has partnered with the County of Humboldt to host a public library, which is located in the same building as City Hall and is open to the public two days per week. The library routinely hosts public literacy events. The City of Blue Lake has partnered with Providence Health to facilitate the Blue Lake Resource Center and has entered into an MOU with Providence to facilitate the use of City owned facilities in support of the program. The Resource Center provides various programs and services to the community, including a food distribution program, senior programming, a clothing distribution program, as well as various programs to support health and wellness counseling and referrals (A. Mager, personal communication, September 17, 2024).

Regulatory Framework

Local

Future development on any sites identified for residential development in the Housing Element Update will be required to comply with all relevant General Plan policies including:

Land Use Element - Utilities and Services Policy:

Policy 5 Development should be encouraged to achieve efficient use of existing public utilities and services.

Land Use Element - Sense of Community Policy:

Policy 2 The City should promote neighborhood organizations and involvement in improving local services, facilities and living conditions.

Discussion

The Housing Element Update is a policy document that does not result in physical changes to the environment but encourages the provision of housing in areas of the City that are already designated and zoned to allow residential development. While policies could require amendments to the Zoning Code or result in actions of the City that could cause a physical change, the policies would not result in specific physical changes to the environment. Additionally, any amendments to the Zoning Code would be subject to project-specific environmental review pursuant to CEQA.

a, i- v) Less Than Significant Impact. The Housing Element Update plans for development on sites that are already designated and zoned for residential development and would be consistent with the projected growth in the City's General Plan.

As discussed in the section on Population and Housing, development of the RHNA allocation of 34 units is estimated to result in a population increase of approximately 72 residents, which would be a 6.3 percent increase in population. Additionally, if all the vacant and likely developable sites listed in the site inventory of the Housing Element Update were developed as estimated in **Table 2** (89 total units), this could result in an estimated population increase of approximately 189 residents, which would be a 16.4 percent increase.

Future residential development in the City as projected in the Housing Element Update could result in an increase in the need for public services. Under CEQA, the need for additional equipment and/or personnel to support public services is not considered a significant impact unless new facilities need to be constructed, that could potentially result in physical impacts. The projected population increase from residential development on the vacant and likely developable sites in the City (189 residents and 16.4 percent increase in population), would not increase the need for public services to the extent that new governmental facilities would need to be constructed. Therefore, the Housing Element Update would result in a less than significant impact in this regard.

	Potentially Significant Impact	*Less Than Significant With Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*

Recreation

Would the project result in:				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

Setting

City standards concerning parkland require that there be at least 3 acres of parkland per 1,000 residents and were enacted pursuant to Government Code Section 66477. The City currently has approximately 9 acres of parks and recreational facilities. As of 2024, 570 households and a population of 1,149 residents were serviced by the 4 park and recreational facilities in Blue Lake, which includes Perigot Park, The Tot Lot, the Town Square, and the rodeo grounds (DOF, 2024). The City's recreation program includes numerous recreation programs, including a public skate program, a trail network, two baseball/softball fields, as well as a dog park and a yearly Summer and break camp program. The City is in the process of building a new bike park and routinely facilitates recreation events, including the Mad River Enduro Bike Race and the Blue Lake Elementary All-Schools Cross Country Event (A. Mager, personal communication, September 17, 2024).

Regulatory Framework

Local

Future development on any sites identified for residential development in the Housing Element Update will be required to comply with all relevant General Plan policies including:

<u>Land Use Element - Preservation of Open Space and Agricultural Lands Policies:</u>

Policy 7 A pedestrian/equestrian pathway system should be developed to connect open space and recreational areas, utilizing existing open space corridors.

Policy 8 Flood prone areas should be designated for agricultural or recreational uses and kept free from urban development wherever possible.

Policy 10 Areas on the river side of the levee, and the levee shall be retained in undeveloped open space; public access to this area, for recreational purposes, shall be encouraged.

Policy 12 Maximum use of school land, utility rights-of-way and other public lands for parks, recreation and open space purposes shall be encouraged.

Discussion

The Housing Element Update is a policy document that does not result in physical changes to the environment but encourages the provision of housing in areas of the City that are already designated and zoned to allow residential development. While policies could require amendments to the Zoning Code or result in actions of the City that could cause a physical change, the policies would not result in specific physical changes to the environment. Additionally, any amendments to the Zoning Code would be subject to project-specific environmental review pursuant to CEQA.

a-b) Less Than Significant Impact. The Housing Element Update plans for development on sites that are already designated and zoned for residential development and would be consistent with the projected growth in the City's General Plan.

As discussed in the section on Population and Housing, development of the RHNA allocation of 34 units is estimated to result in a population increase of approximately 72 residents, which would be a 6.3 percent increase in population. Additionally, if all the vacant and likely developable sites listed in the site inventory of the Housing Element Update were developed as estimated in **Table 2** (89 total units), this could result in an estimated population increase of approximately 189 residents, which would be a 16.4 percent increase. If all these sites were developed as projected, the City's population would increase from 1,149 (DOF, 2024) to approximately 1,338.

Future residential development in the City as projected in the Housing Element Update could result in an increase in the use of parks and recreational facilities. As noted in the Setting, the City currently has 9-acres of parkland and the City's standards concerning parkland require that there be at least 3 acres of parkland per 1,000 residents. With the projected population increase from residential development on the vacant and likely developable sites in the City (increase to approximately 1,338 residents), the acres of parkland needed to meet the City's standard would be approximately 4 acres. Based on the amount of parkland in the City relative to this projected population increase, it is not anticipated that the Housing Element Update would result in substantial physical deterioration of parks and recreational facilities in the City. Therefore, the Housing Element Update would result in a less than significant impact in this regard.

Transportation

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (for example, sharp curves or dangerous intersections) or incompatible uses (for example, farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

Setting

Regional access to the City of Blue Lake is provided by State Route 299, Blue Lake Boulevard, Glendale Drive, Maple Creek Road, West End Road, and Hatchery Road.

Vehicle Traffic

Pursuant to SB 743, traffic congestion is no longer considered a significant impact on the environment under CEQA. Although not required by CEQA, the following discussion about the operational capacity of streets in the City is provided for informational purposes only.

At the time of preparation of the City's 1986 General Plan Circulation Element, traffic counts were obtained within City limits in mid-1985 by City staff with the assistance of the Humboldt County Department of Public Works (City of Blue Lake, 1986; see page 74b of the 1986 Circulation Element). The highest traffic volumes in the City were measured along Blue Lake Boulevard, Greenwood Avenue, and Hatchery Road. Blue Lake Boulevard is the old State Route 299, Greenwood Avenue is the main entrance into the City, and Hatchery Road is the access to the City from the south, which crosses the Mad River. The traffic counts measured approximately 370 vehicles per hour during peak hour traffic and an Average Daily Traffic (ADT) of 3,764 on Greenwood Avenue.

Additional traffic counts were taken by City staff on Greenwood Avenue in the summer of 2015, which measured the following traffic levels:

- 1,973 ADT
- 16% generated by truck traffic
- 131 am Peak (6.6%)
- 185 pm Peak (9.4%)

The traffic levels obtained for Greenwood Avenue in 2015 were significantly lower than the levels obtained in mid-1985 (3,764 ADT in 1985 versus 1,973 ADT in 2015). One possible explanation could be the decline of the timber industry and resulting mill closures and associated decrease in economic activity. Additionally, the City's population has also decreased since the mid-1980s. In contrast to the decreased traffic levels on Greenwood Avenue, the development of the Blue Lake Casino provides a higher level of traffic throughout the day and night on roads such as Blue Lake Boulevard and Chartin Road (County), which provides primary access to the Rancheria.

In the 1986 Circulation Element, it was stated that approximately 1,200 to 1,300 cars per hour would be a high level of traffic for a street with Greenwood's capacity. Additionally, it was also stated that the traffic volume on Greenwood would have to be quadrupled (3,764 to 15,056 vehicle trips per day) to reach capacity. With the decrease in traffic volume since the mid-1980s, it is not anticipated that Greenwood will reach capacity because of build out in the City since the road is fully capable, with its present make-up (parking, width, surface, traffic controls) of handling the increase in volume.

The 1986 Circulation Element includes an analysis of the implications of future growth on the transportation system. As a result of this analysis, the highest priority road improvements were directed towards addressing congestion on Greenwood Avenue, Railroad Avenue, and Hatchery Road (the designated industrial truck route), and the Downtown area. In the last few years, the City completed an intensive engineering and design study for the truck route and the project has been funded to install improvements to the route to slow down traffic and encourage safe access for pedestrians and bicyclists. The planned improvements to the Greenwood portion of the truck route are currently under construction.

Public Transportation

The Humboldt Transit Authority has a transit bus that travels between Willow Creek and Arcata, which serves two bus stops in Blue Lake during the week (City Hall and Blue Lake Casino). Monday through Friday there are 3 westbound runs and 2 eastbound runs. On Saturdays there are 3 westbound and 3 eastbound runs (HTA, 2024).

Trails

In the mid-1980s, much interest was expressed by the community in support of an equestrian and pedestrian trail to the Mad River. Blue Lake's size and topography is conducive to pedestrian and bicycle activity, which allows convenient access to the river and other scenic attractions in the surrounding area. Equestrian use is also common within the City.

In the late 1990s, the City adopted a trails plan, entitled the Blue Lake Community Trail and Pathway Plan, which led to the expansion of trails in the City, including the Powers Creek District loop (former Industrial Park and Business Park loop). This has also included the installation of a pedestrian bridge connecting

Broderick Lane with Monda Way and providing an additional connection between the Downtown and the trail system in the Powers Creek District. Most recently, it has resulted in the installation of a portion of the Annie & Mary Trail (Class I multi-use path) along South Railroad Avenue between Chartin Road and H Street. These trails are used by pedestrians, bicyclists, and equestrians in the community and visitors to the area.

Bicycle Facilities

Class II bike lanes exist on Chartin Road and on Hatchery Road north of the Mad River bridge crossing. As noted above, a Class I multi-use path is located alongside South Railroad Avenue and is part of the planned Annie and Mary Trail that would connect the cities of Arcata and Blue Lake. Bicyclists also ride in the roadway and/or on sidewalks along other streets in the City.

Regulatory Framework

State

Pursuant to SB 743, traffic congestion is no longer considered a significant impact on the environment under CEQA. The new metric bases the traffic impact analysis on vehicle miles traveled (VMT), and potential impacts are reviewed based on land use efficiency rather than road capacity. VMT refers to the amount and distance of automobile travel attributable to a project.

Local

Future development on any sites identified for residential development in the Housing Element Update will be required to comply with all relevant General Plan policies including:

<u>Circulation Element - Circulation Patterns Policies:</u>

Policy 6 Adequate local circulation plans shall be required for future divisions and new development.

<u>Circulation Element - Development Policies:</u>

Policy 7 New development shall be required to provide sidewalks or other street improvements and necessary traffic control signs as determined by the City of Blue Lake.

Policy 8 Adequate street access shall be provided to all newly divided parcels and/or new development. "Flag lots" shall be discouraged.

<u>Circulation Element - Public Transportation Policies:</u>

Policy 15 Public transit service, linking Blue Lake to the nearest public transportation corridor, shall be made available at convenient hours and convenient places within the City.

<u>Circulation Element - Non-Vehicular Access Policies:</u>

Policy 16 The City should establish safe access for non-vehicular traffic to and along the Mad River.

Circulation Element - Truck/Industrial Policy:

Policy 23 As long as the City uses the existing truck route, the City should consider minimizing potential densities for residential lots within one local street or one block of Greenwood Avenue.

Discussion

The Housing Element Update is a policy document that does not result in physical changes to the environment but encourages the provision of housing in areas of the City that are already designated and zoned to allow residential development. While policies could require amendments to the Zoning Code or result in actions of the City that could cause a physical change, the policies would not result in specific physical changes to the environment. Additionally, any amendments to the Zoning Code would be subject to project-specific environmental review pursuant to CEQA.

a) Less Than Significant Impact. The Housing Element Update does not include specific development proposals, nor does it grant development entitlements. The Housing Element Update plans for development on sites that are already designated and zoned for residential development and would be consistent with the projected growth in the City's General Plan. Development of these sites would be considered infill development as these sites are surrounded by existing development and can be served by existing utilities and infrastructure.

As discussed in the section on Population and Housing, development of the RHNA allocation of 34 units is estimated to result in a population increase of approximately 72 residents, which would be a 6.3 percent increase in population. Additionally, if all the vacant and likely developable sites listed in the site inventory of the Housing Element Update were developed as estimated in **Table 2** (89 total units), this could result in an estimated population increase of approximately 189 residents, which would be a 16.4 percent increase. If all these sites were developed as projected, the City's population would increase from 1,149 (DOF, 2024) to approximately 1,338.

Future residential development in the City as projected in the Housing Element Update would result in an increase in vehicle trips on City streets and the use of facilities for alternatives modes and transit service. Future development projects would be reviewed on a case-by-case basis to ensure consistency with applicable regulations that address the circulation system. Depending on the size and character of future projects, a Traffic Impact Study may be required to analyze potential transportation impacts.

Considering the modest increase in population that could result from residential development on the vacant and likely developable sites in the City (189 residents and 16.4 percent increase in population), and the design capacity of the main artery roadway in the City (Greenwood Avenue, Railroad Avenue, and Hatchery Road), it is not anticipated that the Housing Element Update would conflict with any program, plan, ordinance, or policy addressing the circulation system. Therefore, the Housing Element Update would result in a less than significant impact in this regard.

b) Less Than Significant Impact. Senate Bill (SB) 743 established vehicle miles traveled (VMT) as the metric to be applied for determining transportation impacts associated with development projects. Pursuant to SB 743, traffic congestion is no longer considered a significant impact on the environment under CEQA, and potential

impacts are reviewed based on land use efficiency rather than road capacity. VMT refers to the amount and distance of automobile travel attributable to a project.

CEQA Guidelines Section 15064.3(b) provides the criteria for analyzing transportation impacts related to VMT. The City of Blue Lake has not yet established thresholds of significance for VMT. CEQA Guidelines Section 15064.3(b)(3) states that if existing models or methods are not available to estimate the vehicle miles traveled for a particular project, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such qualitative analysis could evaluate factors such as the efficiency of land use patterns, proximity to other destinations, and proximity to facilities for alternative modes.

The Housing Element Update does not include specific development proposals, nor does it grant development entitlements. The Housing Element Update plans for development on sites that are already designated and zoned for residential development and would be consistent with the projected growth in the City's General Plan. Development of these sites would be considered infill development as these sites are surrounded by existing development and can be served by existing infrastructure. Depending on the size and character of future projects, a Traffic Impact Study may be required to analyze potential VMT impacts.

The Housing Element Update indicates that most of the residential development potential on vacant and likely developable sites is located within the City's Powers Creek District, which is zoned to require a mixture of residential and commercial uses. For example, the District is zoned to not allow residential-only development, in order to promote a beneficial mixture of residential and commercial uses. Land use regulations that promote infill and mixed-use development have the potential to reduce vehicle miles traveled.

The City has planned for the following improvements to support pedestrian and bicycle use, which would encourage the use of alternative modes by the future residents on the sites identified as vacant and likely developable in the Housing Element Update. Several of these improvements would specifically improve the pedestrian and bicycle access to and from the Powers Creek District, where most of the residential development potential is projected to occur.

- Paving the existing trail system.
- Eliminating pedestrian facility gaps to improve access between the Powers Creek District, Downtown, and the Blue Lake Elementary School.
- Constructing complete streets improvements along the City's industrial truck route.
- Providing bicycle parking spaces at public facilities and other City-owned property.

Given the proximity of most of the sites planned for residential development to the center of Blue Lake, and the required mix of uses in the Powers Creek District, future residential development would encourage short trips to access a variety of destinations by alternative transportation modes and the completion of these improvements would be expected to reduce VMT. Additionally, most of the sites planned for residential development are within walking distance (<1/3 mile) of the bus stops at City Hall and the Blue Lake Rancheria.

Based on the above discussion, the Housing Element Update would not conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b). Therefore impacts would be less than significant in this regard.

c-d) Less Than Significant Impact. The Housing Element Update does not include specific development proposals, nor does it grant development entitlements. The Housing Element Update plans for development on sites that are already designated and zoned for residential development and would be consistent with the projected growth in the City's General Plan. Development of these sites would be considered infill development as these sites are surrounded by existing development and can be served by existing utilities and infrastructure.

There are multiple routes for access in and out of the City that could be used for emergency access including Blue Lake Boulevard, Hatchery Road/West End Road, Maple Creek Road, Glendale Drive, and State Route 299. The City's designated industrial truck route (Greenwood Avenue, Railroad Avenue, and Hatchery Road) is the main artery roadway through the City that would serve most future residential development identified in the Housing Element Update. According to recent traffic counts, the traffic volumes on Greenwood Avenue are well below its design capacity and it currently operates at an acceptable level of service of C or better (W-Trans, 2023). Although the City's industrial truck route would serve most of the projected residential development in the Housing Element Update, the percentage of truck traffic is a small portion of the overall traffic volume and would not result in incompatibility between the existing industrial and future residential uses.

Future residential development may require new access roads and driveways to development sites that will require review by the Public Works Department, Engineering Department, and Volunteer Fire Protection District to ensure that they comply with applicable design standards for adequate emergency access and do not result in any hazardous design features. In compliance with existing design standards, the Housing Element Update would not increase hazardous design features or incompatible uses and would not result in inadequate emergency access. Therefore, the Housing Element Update would result in a less than significant impact in this regard.

Tribal Cultural Resources

Would the project:	*Potentially Significant Impact*	*Less Than Significant With Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☒	☐
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐

Setting

Public Resources Code Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and meets either of the following criteria:

- Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

The City lies within the traditional territory of the Pat-a-wat division of the Wiyot Indian tribe. By the time of the arrival of European settlers in 1850, the Blue Lake area had become a borderland zone between the territories of the Wiyot and Whilkut tribes (Loud, 1918). The Wiyots of Mad River were a subunit of the larger Wiyot tribe, and were known as Pat-a-wats, after the Wiyot name for Mad River. The territory for the Pat-a-wats was generally described as the lower Mad River from Blue Lake near the junction of the North Fork down to the coast, and thence south to the southern shore of Humboldt Bay (Merriam, 1976).

The sites identified as vacant and likely developable in the site inventory of the Housing Element Update are not known to contain any tribal cultural resources.

Regulatory Framework

State

Senate Bill (SB) 18

CGC §65352.3 (SB 18) requires local governments to contact tribal organizations prior to adopting or amending a general plan or specific plan, and prior to designating open space. The intent of SB 18 is to provide Native American tribes an opportunity to participate in land use decisions for the purpose of protecting or mitigating impacts to Native American cultural resources and sacred sites. Tribes have 90 days to respond to the request for consultation under SB 18.

Assembly Bill (AB) 52

Public Resources Code (PRC) §21084.2 (AB 52) establishes that "*a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment*."

Pursuant to AB 52, in order to determine whether a project may have such an effect, a lead agency is required to consult with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project if the tribe requested to the lead agency, in writing, to be informed through formal notification of proposed projects in the geographical area, and the tribe responds, in writing, within 30 days of receipt of the formal notification and requests the consultation.

Discussion

The Housing Element Update is a policy document that does not result in physical changes to the environment but encourages the provision of housing in areas of the City that are already designated and zoned to allow residential development. While policies could require amendments to the Zoning Code or result in actions of the City that could cause a physical change, the policies would not result in specific physical changes to the environment. Additionally, any amendments to the Zoning Code would be subject to project-specific environmental review pursuant to CEQA.

a, i-ii) Less Than Significant Impact. The Housing Element Update does not include specific development proposals, nor does it grant development entitlements. The Housing Element Update plans for development on sites that are already designated and zoned for residential development and would be consistent with the projected growth in the City's General Plan. As noted in the Setting, the sites identified as vacant and likely developable in the site inventory of the Housing Element Update are not known to contain any tribal cultural resources.

To satisfy the requirements of SB 18, the City provided written notice of the proposed 2019-2027 Housing Element Update to the Tribes in the Humboldt Bay region at the beginning of August 2022. Tribes have 90 days to respond to the request for consultation under SB 18 and no responses were received. To satisfy the requirements of AB 52, the City provided written notice of preparation of a CEQA Initial Study for the 2019-2027 Housing Element Update to the Tribes in the Humboldt Bay region at the end of January 2024. Tribes have 30 days to respond to the request for consultation under AB 52 and no responses were received.

All future residential development within the City would be required to comply with local and State regulations that protect cultural resources. At the local level, the City's General Plan and the regulations in Municipal Code Chapter 15.12 (Grading, Erosion, and Sediment Control) require the implementation of an inadvertent discovery protocol for all development. This protocol requires construction activity to cease if cultural resources are encountered during permitted or non-permitted construction activities. Future projects that require discretionary review would also be subject to review under CEQA, which could require consultation with local Tribes and preparation of a site-specific Cultural Resources Investigation. If a site is considered sensitive for cultural resources or resources are discovered during site-specific investigation, mitigation would be required to reduce potential impacts.

Therefore, in compliance with existing regulatory requirements, the Housing Element Update would result in a less than significant impact related to tribal cultural resources.

Utilities and Service Systems

Would the project:	*Potentially Significant Impact*	*Less Than Significant With Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Setting

Water

The City of Blue Lake obtains all of its domestic water supply through a contract with the Humboldt Bay Municipal Water District (HBMWD). Water is delivered to the city via a booster pump station northwest of the City on Glendale Drive. The City's water system includes two redwood water storage tanks, transmission mains, fire hydrants, valves, and the water services from the mains to individual water meters. The City owns and operates the booster pump station on Glendale Drive, which pumps water through a single pipe into the City's main distribution system to a pressure needed to fill two storage tanks. The distribution system consists of 51,050 feet of pipeline which is mostly asbestos cement, installed in the early 1970s. The booster station pumps water into town and the water that is not used flows through the system and into the City's

storage tanks. The City has two redwood storage tanks with a total storage capacity of 900,000 gallons (Humboldt LAFCo, 2019). There is an existing water main line along Taylor Way that was designed to serve industrial development and is available to serve most of the residential development potential projected in the Housing Element Update.

The City's daily water use allotment is currently 400,000 gallons, established via the contract with HBMWD. Currently, the City reports that the average water use during peak use months is approximately 150,000 gallons per day (gpd), 38% of the daily allotment from HBMWD. Based on the City's current population of 1,149 residents as estimated by the California Department of Finance (DOF, 2024), daily per capita water use is conservatively estimated to be approximately 131 gallons per day (gpd) based on the peak use months noted above (150,000 gallons).

Wastewater

The Blue Lake Wastewater Treatment Plant (WWTP) is located in the northwest portion of the City. The WWTP is a primary headworks facility followed by a 7.5 acre, 4-cell secondary treatment lagoon system, a chlorine disinfection system, and two effluent disposal percolation ponds. The WWTP has an average dry weather flow (ADWF) of 0.18 million gallons per day (MGD). The wastewater treatment capacity is 1 million gallons per day (mgd). The system is designed for average flows of 0.25 mgd and peak flows of 1.54 mgd (Humboldt LAFCo, 2019). According to the City Public Works Department, the City's average dry weather flows are currently 0.09 mgd, which is approximately 9 percent of the plant's 1 mgd capacity and 36 percent of the average flow design capacity. To date, the system has not experienced any sewer overflow events.

In 2013, the City adopted an Interim Policy Pertaining to the Release of Sewer Capacity. It determined that the WWTP had a remaining unallocated sewer capacity equal to 100 residential equivalent units (REUs). The City has approved projects to use the remaining REUs, but these projects have not yet been constructed. The City is planning capital improvements to the WWTP to serve the development in the Powers Creek District, which includes electrical panel upgrades and installation of two (2) 5 h.p. aerators at the treatment plant. These improvements, which would increase treatment capacity by approximately 180 residential equivalent unit (REUs), were previously planned to serve an expansion of production at the Mad River Brewery (MRB). The proposal by MRB to expand their production was ultimately abandoned and the City did not construct the improvements to the WWTP to provide the additional capacity.

Stormwater

A large portion of the City of Blue Lake's stormwater infrastructure dates back to the 1950s and 60s and some of the facilities may need to be serviced or replaced in the near future. The City constructed stormwater infrastructure in the early 1980s in the Powers Creek District, when the City was planning to redevelop the former McIntosh Mill site as an industrial park. The City has not adopted its own stormwater regulations and is not within the municipal separate storm sewer systems (MS4) permit area in Humboldt County. Onsite and offsite stormwater improvement requirements for development projects are applied on a case-by-case basis.

Dry Utilities
Electricity is supplied to the City through Redwood Coast Energy Authority Community Choice Energy Program (RCEA, 2024), which utilizes the Pacific Gas and Electric Company (PG&E) electrical grid. Gas is supplied to the City through PG&E. Telecommunications are supplied to the City by Optimum and AT&T.

Solid Waste
Humboldt Waste Management Authority (HWMA) was formed through a joint powers' agreement in 1999, and is comprised of six jurisdictions within Humboldt County: the cities of Arcata, Blue Lake, Eureka, Ferndale, Rio Dell, and representing the unincorporated areas, Humboldt County. Solid waste produced in the City of Blue Lake is collected by Blue Lake Garbage and transported to a transfer station in the Humboldt Bay region such as the HWMA transfer station in Eureka, California. The solid waste is then transported to the Dry Creek Landfill in White City, Oregon. The Dry Creek Landfill has an operational life exceeding 100 years (Dry Creek Landfill, Inc., 2024).

Regulatory Framework

Local

Future development on any sites identified for residential development in the Housing Element Update will be required to comply with all relevant General Plan policy including:

Land Use Element - Utilities and Services Policies:

Policy 3 Solid waste, whether public or private, shall be properly collected, stored and transported to protect public health and safety and to ensure a clean community appearance.

Policy 4 The City shall not allow development which would exceed the City's sewage treatment capacity; nor shall the City knowingly allow development which could adversely affect water quality in the Mad River.

Policy 5 Development should be encouraged to achieve efficient use of existing public utilities and services.

Policy 6 In approving development, the City shall be consistent in requiring street improvements, sidewalks, curbs, gutters, fire protection systems, utility undergrounding and other pertinent improvements.

Policy 7. The City shall provide adequate supply of good quality water to all current users; new users shall be accommodated without diminishing existing levels of service.

Policy 8 The City shall reserve sewer capacity for the residential build-out projected in the Housing Element. Any remaining unallocated sewer capacity shall be made available to nonresidential uses as approved by the City Manager and/or City Council.

Policy 11 Due to limited remaining sewer capacity, large water users/strong dischargers shall be required to use alternative treatment/pre-treatment methods, where feasible, rather than the City

sewage treatment system.

Policy 12 Fees shall be charged by the City for water and sewer system users; these fees shall be determined equitably, based on the entire system costs. Multiple uses of the same hookup shall be discouraged unless sufficient justification, as determined by Public Works, can be provided to do otherwise.

Land Use Element – Utilities and Services Implementation Measures:

Measure C The City should develop an annual Capital Improvements program for major construction, repair, and replacement of public facilities. During the upcoming period, for instance, the City should consider the following capital improvements:

- Improvements to the sewer treatment plant to increase capacity to accommodate new commercial and industrial users.

Housing Element Update – Wastewater Treatment Plant Improvements Program:

HI-18 To address the potential insufficient wastewater treatment capacity during a portion of the planning period, the City shall construct the wastewater treatment plant improvements identified in the City's Capital Improvement Plan within two years of adopting the housing element. These improvements include electrical panel upgrades and the installation of two (2) 5-horsepower aerators, which are estimated to provide an additional 180 residential equivalent units (REUs).

Discussion

The Housing Element Update is a policy document that does not result in physical changes to the environment but encourages the provision of housing in areas of the City that are already designated and zoned to allow residential development. While policies could require amendments to the Zoning Code or result in actions of the City that could cause a physical change, the policies would not result in specific physical changes to the environment. Additionally, any amendments to the Zoning Code would be subject to project-specific environmental review pursuant to CEQA.

a) Less Than Significant Impact. The Housing Element Update does not include specific development proposals, nor does it grant development entitlements. The Housing Element Update plans for development on sites that are already designated and zoned for residential development and would be consistent with the projected growth in the City's General Plan. Development of these sites would be considered infill development as these sites are surrounded by existing development and can be served by existing utilities and infrastructure.

Future residential development in the City would require utility infrastructure improvements that would result in physical impacts to the development sites and the adjacent public right-of-way to connect to existing infrastructure. These potential impacts from future residential development will be addressed when permit applications are submitted. Through the building permit process, impacts would be addressed through compliance with existing infrastructure design standards and regulatory requirements. If the future projects

require a discretionary permit, then analysis of the impacts would also be required under CEQA.

In compliance with existing design standards and regulatory requirements, potential impacts related to the construction or relocation of utility infrastructure from future residential development would not cause significant environmental effects. Therefore, impacts would be less than significant in this regard.

b) Less Than Significant Impact. The City's daily water use allotment is currently 400,000 gallons, established via the contract with HBMWD. Currently, the City reports that the average water use during peak use months is approximately 150,000 gallons per day (gpd), 38% of the daily allotment from HBMWD. Based on the City's current population of 1,149 residents as estimated by the California Department of Finance (DOF, 2024), daily per capita water use is conservatively estimated to be approximately 131 gallons per day (gpd) based on the peak use months noted above (150,000 gallons).

The HBMWD draws water from the unconfined Holocene River Channel Deposits aquifer at a depth of 60 to 90 feet below the bed of the Mad River through Ranney wells situated in or in close proximity to the Mad River. Water is extracted from this aquifer instead of directly from the river since percolation through surface ground layers help to naturally filter water and improve quality of the drinking water supply. The amount of water supplied to the City under existing conditions is less than 1 percent of the annual yield of the Mad River. The HBMWD Groundwater Management Plan indicates that groundwater recharge is achieved by inundation of the recharge areas in the Mad River channel through the District's operation of Matthews Dam and Ruth Lake. As a result, additional residential development within the City would not have a direct impact on the volume of groundwater available to HBMWD. Additionally, the HBMWD has indicated that there is sufficient supply for currently forecasted development in the Humboldt Bay Region.

As discussed in the section on Population and Housing, if all the vacant and likely developable sites listed in the site inventory of the Housing Element Update were developed as estimated in **Table 2** (89 total units), this could result in an estimated population increase of approximately 189 residents, which would be a 16.4 percent increase. If all these sites were developed as projected, the City's population would increase from 1,149 (DOF, 2024) to approximately 1,338. With this increase in population, it is estimated that daily water use would increase by approximately 24,760 gallons for a total of 174,760 gallons during peak use months. Since the estimated increase in daily water use would be well within the City's daily water use allotment of 400,000 gallons, there would be sufficient water supplies available to serve the residential development projected in the Housing Element Update. Therefore, the Housing Element Update would result in a less than significant impact in this regard.

c) Less Than Significant Impact. In 2013, the City adopted an Interim Policy Pertaining to the Release of Sewer Capacity. It determined that it had a remaining unallocated sewer capacity equal to 100 residential equivalent units (REUs). Of the estimated remaining REUs, 60 REUs were reserved then for residential connections, including both single- and multi-family uses, and 40 REUs were then made available for non-residential use. According to the City Engineer, the remaining wastewater treatment capacity is anticipated to be used by the approved (not constructed yet) and proposed development projects in the City. Therefore, improvements to the City's wastewater treatment facility will be required in order to have adequate capacity to serve the residential development potential projected in the Housing Element Update. As identified in the City's Capital Improvement Plan, these improvements include electrical panel upgrades and the installation

of two (2) 5 horsepower aerators, which are anticipated to provide an additional 180 REUs. To address the potential for insufficient wastewater treatment capacity during a portion of the 6th cycle planning period, the City has included Program HI-18 in the Housing Element Update, which commits the City to construction of the wastewater treatment plant improvements within two years of adoption of the Housing Element. This implementation schedule will ensure there is sufficient wastewater treatment capacity available during the planning period for development on the vacant and likely developable sites identified in the site inventory of the Housing Element Update. The City anticipates requiring future residential development projects to pay a fair share contribution to the improvements to the WWTP through a development impact fee, which will be determined based on the estimated REUs for the projects. In compliance with Program HI-18, the City would have sufficient wastewater treatment capacity to serve the projected residential development potential. Therefore, the Housing Element Update would result in a less than significant impact in this regard.

d-e) Less Than Significant Impact. The Housing Element Update does not include specific development proposals, nor does it grant development entitlements. The Housing Element Update plans for development on sites that are already designated and zoned for residential development and would be consistent with the projected growth in the City's General Plan. Development of these sites would be considered infill development as these sites are surrounded by existing development and can be served by existing utilities and infrastructure.

Future residential development within the City would increase the demand for solid waste services and would increase the amount of solid waste generated and sent to landfills. Solid waste produced in the City is collected by Blue Lake Garbage and transported to a transfer station in the Humboldt Bay region such as the HWMA transfer station in Eureka, California. The solid waste is then transported to the Dry Creek Landfill in White City, Oregon. The Dry Creek Landfill has an operational life exceeding 100 years (Dry Creek Landfill, Inc., 2024). The HWMA transfer station and the Dry Creek Landfill have sufficient capacity for the foreseeable future to accommodate the solid waste generated by future residential development in the City of Blue Lake. Additionally, all future development would be required to comply with application regulations related to reducing solid waste, recycling, and so on. Therefore, the Housing Element Update would result in a less than significant impact in this regard.

	Potentially Significant Impact	*Less Than Significant With Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*

Wildfires

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, **would the project**:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

Setting

The City of Blue Lake is an incorporated city located in Humboldt County, California, eight miles inland from Humboldt Bay on State Route 299 (see **Figure 1**). The City is situated in the Mad River Valley and the Mad River borders the City on the south and west. The lands surrounding Blue Lake are comprised of steep hillsides to the north and east and generally flat agricultural lands to the west and south. The land uses surrounding Blue Lake are a combination of rural residential, agriculture, timberland, commercial, industrial, and open space land uses.

Fire protection in Humboldt County is provided by local districts, cities, and the California Department of Forestry and Fire Protection (CAL FIRE, 2024a). The City limits are located in a Local Responsibility Area (LRA), which is served by the Blue Lake Volunteer Fire Protection District. Forestlands surrounding the City are in a State Responsibility Area (SRA) that is served by CAL FIRE. The closest fire station to the project site is the main station for the Volunteer Fire Protection District, which is near City Hall on First Avenue. The forestlands in this part of Humboldt County could be subject to wildfire and are classified by CAL FIRE as Moderate, High, and Very High Fire Hazard Severity Zones. The City limits and forestlands immediately surrounding the City are classified by CAL FIRE as being in a Moderate Fire Hazard Severity Zone (CAL FIRE, 2024).

Regulatory Framework

State

California Department of Forestry and Fire Protection (CAL FIRE)
The Bates Bill (AB 337), enacted in 1992, required CAL FIRE to work with local governments to identify high fire hazard severity zones throughout each county in the State. CAL FIRE adopted Fire Hazard Severity Zone (FHSZ) Maps for SRAs in November 2007. Pursuant to CGC §51175-51189, CAL FIRE also recommended FHSZs for Local Responsibility Areas (LRAs). Over the years, CAL FIRE has updated the maps and provided new recommendations to local governments based on fire hazard modeling.

The fire hazard model considers wildland fuels (natural vegetation that burns during the wildfire); topography (fires burn faster as they burn up-slope); weather (fire burns faster and with more intensity when air temperature is high, relative humidity is low, and winds are strong); and ember production and movement (how far embers move and how receptive the landing site is to new fires). The model recognizes that some areas of California have more frequent and severe wildfires than other areas.

California Fire, Building, and Residential Codes
California Fire Code, Part 9, Chapter 49 (Wildland-Urban Interface Fire Areas), California Building Code Chapter 7A (Materials and Construction Methods for Exterior Wildfire Exposure), and California Residential Code Section R337 include standards for new construction in Wildland-Urban Interface Fire Areas (fire hazard severity zones). A Wildland-Urban Interface Fire Area is defined as a geographic area identified by the State as a Fire Hazard Severity Zone in accordance with PRC §4291 through §4204, and Government Code §51175 through §51189, or other areas designated by the local enforcing agency to be at a significant risk from wildfires. The purpose of the standards is to prevent a building from being ignited by flying embers that can travel as much as a mile away from a wildfire and to contribute to a systematic reduction in fire-related losses through the use of performance and prescriptive requirements. In addition, as of 2011, the CRC requires that automatic fire sprinkler systems be installed in all new single-family residences to protect all areas of a dwelling unit in the event of a fire.

Local

Future development on any sites identified for residential development in the Housing Element Update will be required to comply with all relevant General Plan policies including:

<u>Public Safety Element Policies</u>:

Policy 11 The City of Blue Lake should ensure good fire protection by improving the water and hydrant system wherever necessary to eliminate dead end mains, provide adequate valving, provide a minimum of 1,500 gallons per minute from any single hydrant at the maximum daily residential consumption rate, provide hydrants within 300 feet of any point, and provide adequate storage for the types of fire encountered.

Policy 12 Enforcement of the Building Code, the Housing Code, and Title 19 of the California Administrative Code and the City Weed Abatement Ordinance should be given high priority to ensure adequate new construction and the correction of unsafe fire conditions.

Policy 15 Where existing streets are narrow, on street parking should be controlled so that emergency vehicles will be able to pass at all times. Downtown Blue Lake needs to be studied to determine the types of control that will relieve existing congestion.

Policy 37 State Highway 299 (in both directions), Glendale Boulevard and Blue Lake Boulevard, Maple Creek Road and West End Road should be designated as evacuation routes from the planning area, Greenwood Avenue, Railroad Avenue and I Street are the evacuation routes within the city. These routes should be kept passable in major emergencies recognizing that the type and location of the disaster will determine which will be most needed.

Discussion

The Housing Element Update is a policy document that does not result in physical changes to the environment but encourages the provision of housing in areas of the City that are already designated and zoned to allow residential development. While policies could require amendments to the Zoning Code or result in actions of the City that could cause a physical change, the policies would not result in specific physical changes to the environment. Additionally, any amendments to the Zoning Code would be subject to project-specific environmental review pursuant to CEQA.

a-d) Less Than Significant Impact. The Housing Element Update does not include specific development proposals, nor does it grant development entitlements. The Housing Element Update plans for development on sites that are already designated and zoned for residential development and would be consistent with the projected growth in the City's General Plan. Development of these sites would be considered infill development as these sites are surrounded by existing development and can be served by existing utilities and infrastructure.

There are multiple routes for access in and out of the City that could be used for emergency evacuations including Blue Lake Boulevard, Hatchery Road/West End Road, Maple Creek Road, Glendale Drive, and State Route 299. The City's designated industrial truck route (Greenwood Avenue, Railroad Avenue, and Hatchery Road) is the main artery roadway through the City that would serve most future residential development identified in the Housing Element Update. According to recent traffic counts, the traffic volumes on Greenwood Avenue are well below its design capacity and it currently operates at an acceptable level of service of C or better (W-Trans, 2023). Future residential development may require new access roads and driveways to development sites that will require review by the Public Works Department, Engineering Department, and Volunteer Fire Protection District to ensure that they comply with applicable design standards for emergency access including, but not limited to, lane widths, road surfaces, vertical clearance, brush clearance, and allowable grades. Based on the projected buildout identified on vacant and likely developable sites in the site inventory of the Housing Element Update (89 units; see Table 21 in Housing Element Update; City of Blue Lake, 2024b), it is not anticipated that future residential development in the

City would impair implementation of an adopted emergency response plan or emergency evacuation plan. Therefore, there would be a less than significant impact in this regard.

Fire protection in Humboldt County is provided by local districts, cities, and the California Department of Forestry and Fire Protection (CAL FIRE). The City limits are located in a Local Responsibility Area (LRA), which is served by the Blue Lake Volunteer Fire Protection District. Forestlands surrounding the City are in a State Responsibility Area (SRA), which is served by CAL FIRE. The closest fire station to the project site is the main station for the Volunteer Fire Protection District, which is near City Hall on First Avenue. The forestlands in this part of Humboldt County could be subject to wildfire and are classified by CAL FIRE as Moderate, High, and Very High Fire Hazard Severity Zones. The City limits and forestlands immediately surrounding the City are classified by CAL FIRE as being in a Moderate Fire Hazard Severity Zone (CAL FIRE, 2024).

There are three primary factors that are used in assessing wildfire hazards - topography, weather, and fuel. The sites identified as vacant and likely developable in the site inventory of the Housing Element Update would be in a Moderate Fire Hazard Severity Zone and do not exhibit topography, vegetation patterns, or other factors (for example, fuels, aspect, etc.) that would expose future residents or structures to a significant risk of wildland fires or exacerbate wildfire risks. The future residents would be at no greater risk of experiencing pollutant concentrations from wildfires than other residents in the Humboldt Bay region. Future residential development will require new infrastructure and utilities, which would be installed and maintained at the development sites and adjacent public right-of-way. The location of new infrastructure would occur in a Moderate Fire Hazard Severity Zone in City limits and is not anticipated to exacerbate fire risk or result in ongoing impacts to the environment. The residential development potential projected in the Housing Element Update would occur on sites that are generally flat and would not be subject to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, the Housing Element Update would result in a less than significant impact in this regard.

	Potentially Significant Impact	*Less Than Significant With Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Mandatory Findings of Significance:				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☐	☒	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly	☐	☐	☒	☐

Discussion

The Housing Element Update is a policy document that does not result in physical changes to the environment but encourages the provision of housing in areas of the City that are already designated and zoned to allow residential development. While policies could require amendments to the Zoning Code or result in actions of the City that could cause a physical change, the policies would not result in specific physical changes to the environment. Additionally, any amendments to the Zoning Code would be subject to project-specific environmental review pursuant to CEQA.

a) Less Than Significant Impact. As discussed in the applicable environmental resource sections above, the proposed 2019-2027 Housing Element Update does not have the potential to degrade the quality of the environment, substantially reduce fish or wildlife habitats, impact wildlife populations or ranges, or eliminate important examples of the major periods of California history or prehistory.

The proposed 2019-2027 Housing Element Update does not entitle, propose, or otherwise require the construction of new housing units or rehabilitation of existing housing units, and does not allow development

in areas that are not already designated and zoned for residential development as identified in the City's General Plan Land Use Element and Zoning Code.

Through the City's development review process, future residential development projects would be evaluated to identify potential environmental impacts to biological and cultural resources and ensure compliance with existing laws and regulations protecting these resources. Where applicable, appropriate project changes and/or mitigation measures would be required to avoid/minimize potential impacts associated with future projects. In compliance with existing laws and regulations, the Housing Element Update would result in a less than significant impact in this regard.

b) Less Than Significant Impact. As defined in §15355 of the CEQA Guidelines, a cumulative impact consists of an impact that is created as a result of the combination of a proposed project together with other closely related past, present, and reasonably foreseeable future projects that cause related impacts. As noted in §15064(h)(4) of the CEQA Guidelines, the mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable.

The proposed 2019-2027 Housing Element Update is a policy document that identifies goals, policies, and implementation programs that are necessary to accommodate adequate housing in the City in accordance with the RHNA. The Housing Element Update does not include specific development proposals, nor does it grant development entitlements. The Housing Element Update plans for development on sites that are already designated and zoned for residential development and would be consistent with the projected growth in the City's General Plan. Development of these sites would be considered infill development as these sites are surrounded by existing development and can be served by existing utilities and infrastructure.

As discussed in the section on Population and Housing, development of the RHNA allocation of 34 units is estimated to result in a population increase of approximately 72 residents, which would be a 6.3 percent increase in population. Additionally, if all the vacant and likely developable sites listed in the site inventory of the Housing Element Update were developed as estimated in **Table 2** (89 total units), this could result in an estimated population increase of approximately 189 residents, which would be a 16.4 percent increase. If all these sites were developed as projected, the City's population would increase from 1,149 (DOF, 2024) to approximately 1,338. Considering the decrease in population and economic activity in the City over the last two decades, it is not anticipated that this level of growth would result in significant cumulative impacts in any of the resource categories analyzed in this document.

As discussed in the various resource sections of this document, in compliance with existing laws and regulations, future residential development in the City is not anticipated to result in significant environmental impacts. Future development projects would be evaluated on a case-by-case basis through the City's development review process to identify potential impacts and ensure compliance with existing laws and regulations. Where applicable, appropriate project changes and/or mitigation measures would be required to avoid/minimize potential impacts. In compliance with existing laws and regulations, the Housing Element Update would result in a less than significant impact in this regard.

c) Less Than Significant Impact. As discussed in the applicable environmental resource sections of this document, the proposed 2019-2027 Housing Element Update does not have any components that would

result in adverse effects on human beings. Future development projects would be evaluated on a case-by-case basis through the City's development review process to identify potential impacts and ensure compliance with existing laws and regulations for the protection of public health and safety. Where applicable, appropriate project changes and/or mitigation measures would be required to avoid/minimize potential impacts on human beings. In compliance with existing laws and regulations, the Housing Element Update would result in a less than significant impact in this regard.

References

The following documents were used in the preparation of this document. The documents are available for review at the Blue Lake City Hall during regular business hours (9 a.m. to 12 p.m. and 1 p.m. to 4 p.m.) or online as noted in the references below.

Blue Lake Rancheria. 2024. *Website - About*. [Online]: https://www.bluelakerancheria-nsn.gov/about/.

California Air Resources Board (CARB). 2022. *Scoping Plan for Achieving Carbon Neutrality*. [Online]: https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents.

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Attachment 4

Comments Received on the Draft CEQA Negative Declaration for the Blue Lake General Plan Housing Element Update

Outlook

Re: NCRWQCB comment on Blue Lake Housing Element

From Garry Rees <grees@shn-engr.com>
Date Thu 10/17/2024 10:00 AM
To Bauer, Heidi M.@Waterboards <Heidi.M.Bauer@Waterboards.ca.gov>
Cc McLaughlin, Kelsey R.@Waterboards <Kelsey.McLaughlin@Waterboards.ca.gov>; citymanager@bluelake.ca.gov <citymanager@bluelake.ca.gov>; Leanna Brotherton <lbrotherton@shn-engr.com>

2 attachments (4 MB)
Figure 3_Vacant Parcels Map_HE Update Neg Dec.pdf; GeoTracker-BL LUST Cleanup Sites.pdf;

Heidi,

Thank you for your comments on the CEQA Negative Declaration for the Blue Lake Housing Element Update.

Attached is the vacant parcels map (Figure 3) included on page 6 of the Negative Declaration prepared for the Housing Element Update. This map shows the parcels that are included in the site inventory of the Housing Element Update and are projected to be likely developable for residential uses. Also attached is a map from the Geotracker website showing the leaking underground storage tank (LUST) cleanup sites in the City of Blue Lake. To clarify and as indicated on the attached maps, none of the vacant parcels shown on Figure 3 are sites that are listed as hazardous materials sites that are under the oversight of the North Coast Regional Water Quality Control Board.

Therefore, the City's Housing Element Update is not planning for residential development on the LUST cleanup sites in the City.

Thanks.

Garry Rees, AICP
Principal Planner

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Geosciences, Planning & Permitting, Surveying
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(707) 441-8855

From: Bauer, Heidi M.@Waterboards <Heidi.M.Bauer@Waterboards.ca.gov>
Sent: Monday, September 30, 2024 2:29 PM

To: Garry Rees <grees@shn-engr.com>
Cc: McLaughlin, Kelsey R.@Waterboards <Kelsey.McLaughlin@Waterboards.ca.gov>
Subject: NCRWQCB comment on Blue Lake Housing Element

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

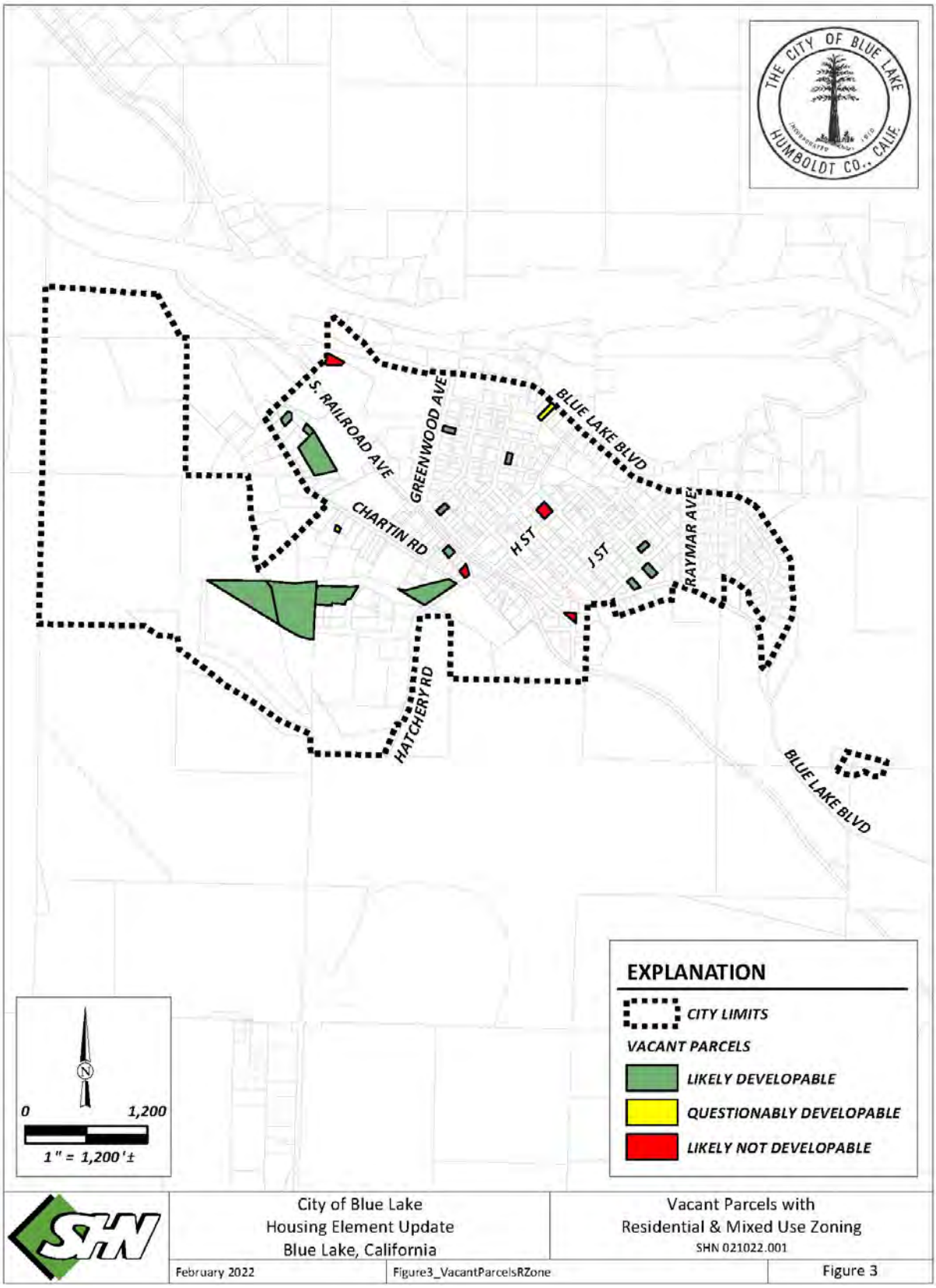
Dear Garry Rees, we reviewed the City Of Blue Lake proposed housing element The City of Blue Lake 2019-2027 Housing Element Update (ca.gov) and as noted in the Initial Study on Pages 74 -78 there are nine sites listed as hazardous materials release sites, most of them being under the oversight of our agency, the North Coast Regional Water Quality Control Board. While these sites are considered closed, most of them were closed using screening criteria intended for the current use which most often was commercial/industrial. Since these sites were closed using commercial screening criteria, they may contain contaminants above residential screening thresholds and thereby not be appropriate for residential development without further investigation and/or remediation. Furthermore, some of these sites already have soil management plans which require proper management and handling of any soils excavated at the site. This is because the remaining soils at the site are above screening levels, and while they pose no significant threat to human health or the environment as undisturbed soils in the current use setting, they could pose a threat if unearthed without proper mitigations.

We are supportive of the Housing Element for the City of Blue Lake, but please note that precautions and additional work may be necessary in order to develop these parcels into residential units so that there are no significant health risks to future occupants. Please let me know if you have any questions or would like to discuss this further.

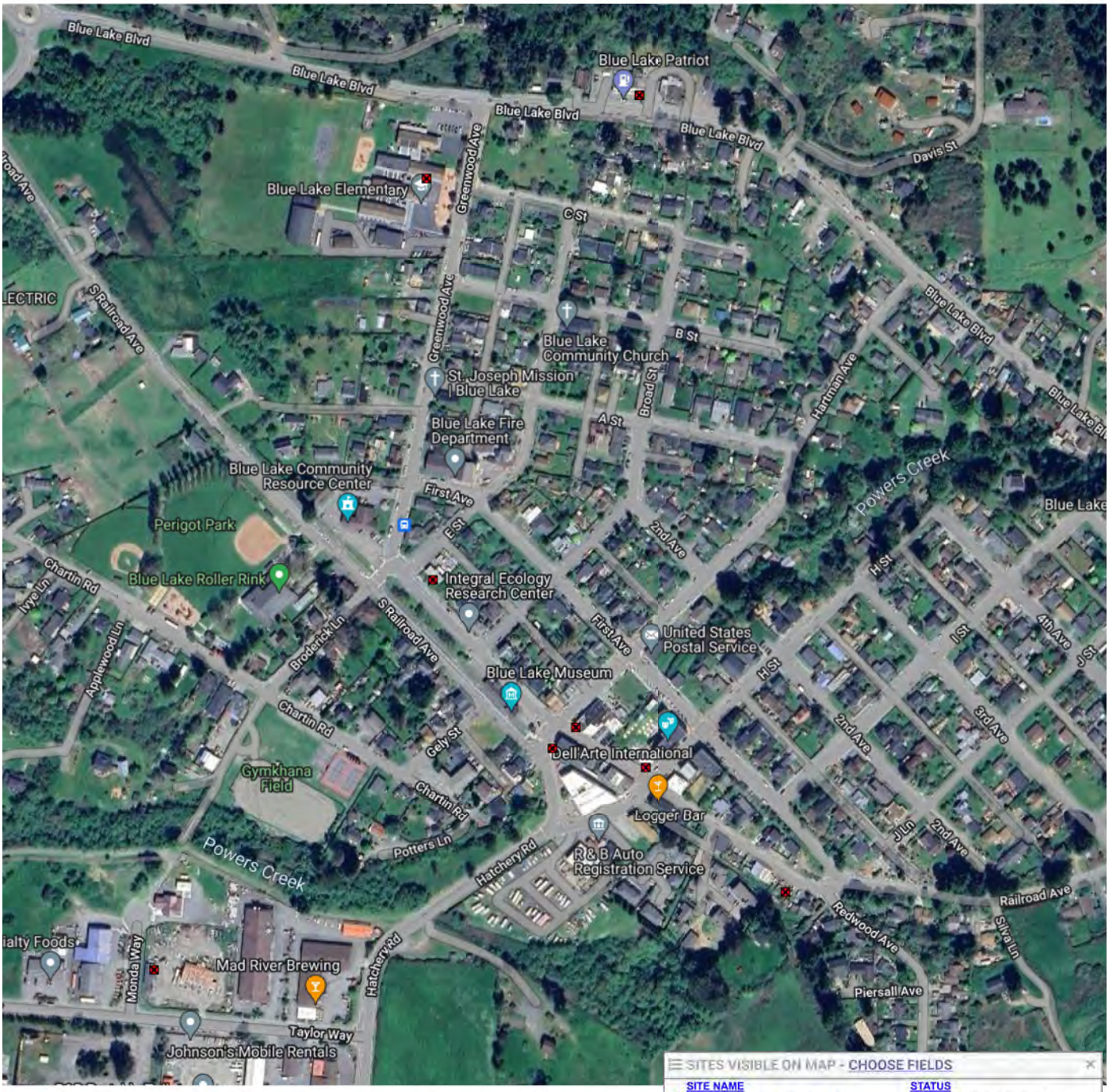
Best,

Heidi

Heidi M. Bauer, P.G.
Senior Engineering Geologist
Site Cleanups Unit Supervisor
North Coast Regional Water Quality Control Board
5550 Skylane Blvd. Suite A
Santa Rosa, CA. 95403
heidi.m.bauer@waterboards.ca.gov
Office: (707) 570-3769



City of Blue Lake Housing Element Update Blue Lake, California		Vacant Parcels with Residential & Mixed Use Zoning SHN 021022.001
February 2022	Figure3_VacantParcelsRZone	Figure 3



SITES VISIBLE ON MAP - CHOOSE FIELDS

SITE NAME	STATUS
BIG OIL & TIRE - BLUE LAKE BP	COMPLETED - CASE CLOSED
BLUE LAKE BELTING AND LEATHER WORKS	COMPLETED - CASE CLOSED
BLUE LAKE MARKET	COMPLETED - CASE CLOSED
BLUE LAKE PUBLIC WORKS YARD	COMPLETED - CASE CLOSED
BLUE LAKE UNION ELEMENTARY SCHOOL	COMPLETED - CASE CLOSED
HCDPW BLUE LAKE MAINTENANCE STATION	COMPLETED - CASE CLOSED
JACKSONS GARAGE	COMPLETED - CASE CLOSED
LUNDBLADE PROPERTY	COMPLETED - CASE CLOSED
PRIVATE RESIDENCE	COMPLETED - CASE CLOSED

LEGEND - CHOOSE MORE SITES

- LUST Cleanup Sites - REMOVE
- Cleanup Program Sites - REMOVE
- Military Cleanup Sites - REMOVE
- Military Privatized Sites - REMOVE
- Military UST Sites - REMOVE

Signifies a Closed Site

ACTIVE MAP COVERAGES:

- Military Bases - REMOVE

Map data ©2024 Imagery ©2024 Airbus, Maxar Technologies 50 m Report a map error

Sites Shown on Map: 9 Total Sites 0 Open Sites 9 Closed Sites 7 Sites w/Water Quality Data

Outlook

Re: Notice of Intent for a Negative Declaration_Housing Element_follow-up

From Garry Rees <grees@shn-engr.com>
Date Thu 10/17/2024 3:09 PM
To ldiane <ldiane@sonic.net>
Cc Leanna Brotherton <lbrotherton@shn-engr.com>

Hi Lisa,

I am back in the office from vacation and am getting through my emails. Apologies for the delayed response.

The current draft of the Housing Element Update (dated Feb. 2024) is available on the City's website at the following link:

https://bluelake.ca.gov/wp-content/uploads/2024/09/02012024-BlueLake-6thCycle-HousingElementUpdate.pdf

Below is a response to the questions in your 10/13/24 email:

1. In the information letter it says that "The update identifies the potential for development of up to 89 new housing at full buildout of the City's existing vacant lot inventory." By "City's" existing lot inventory--does that apply to just the City-owned property on Taylor Way or empty lots throughout the town? I recall a map showing a lot inventory throughout the town--are those the lots available AND is that map current?
The existing vacant lot inventory is listed in Table 21 (Inventory of Vacant Land Available for Residential Development) and shown on Figure 1 (Vacant Site Inventory) in the Housing Element Update (dated Feb. 2024). The existing vacant lot inventory includes both publicly and privately owned properties in the City.

2. Please elaborate on what "full build-out means". Number of stories/height....etc.
When the term "full build-out" is used, it is referring to the number of residential units that are projected to occur on the vacant and likely developable sites identified in the City's Housing Element Update. In the Housing Element Update, it is projected that 89 units could occur on the vacant and likely developable sites in the City. The number of stories/height is dependent on the development standards for each zone that these sites are located in, which varies by zone. The maximum height allowed in the zones containing sites identified as vacant and likely developable typically ranges from 35-45 feet.

Thanks.

Garry Rees, AICP
Principal Planner

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Geosciences, Planning & Permitting, Surveying
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(707) 441-8855

From: ldiane <ldiane@sonic.net>
Sent: Sunday, October 13, 2024 7:29 AM
To: Garry Rees <grees@shn-engr.com>
Subject: Fwd: Notice of Intent for a Negative Declaration_Housing Element_follow-up

> **CAUTION:** This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Garry,
Would appreciate hearing back on the questions below. When I return I could schedule a meeting if that would be better. Let me know.
Also Anali sent the link to the Housing Element yet it was dated some months ago--please let me know if what is online IS the most current version.
Thank you.
Lisa Hoover

-------- Original Message --------
Subject: Notice of Intent for a Negative Declaration_Housing Element
Date:2024-10-04 16:39
From:ldiane <ldiane@sonic.net>
To:grees@shn-engr.com

Hello Garry,
I saw this item on the Blue Lake Webpage. Is the environmental document associated with this posted on the web page? If not, would you please have the City post the document AND please let me know when this takes place.
Questions:

- In the information letter it says that "The update identifies the potential for development of up to 89 new housing at full buildout of the City's existing vacant lot inventory." By "City's" existing lot inventory--does that apply to just the City-owned property on Taylor Way or empty lots throughout the town? I recall a map showing a lot inventory throughout the town--are those the lots available AND is that map current?
- Please elaborate on what "full build-out means". Number of stories/height....etc.

I would schedule a meeting with you but will not be in town for a couple of weeks so wanted to see if as a start, an email exchange might work.
Thank you.
Lisa Hoover

Outlook

Re: City of Blue Lake Housing Element Negative Dec

From Garry Rees <grees@shn-engr.com>
Date Mon 10/28/2024 9:51 AM
To Kent Sawatzky <kentsawatzky@hotmail.com>
Cc Anali Gonzalez <adminasst@bluelake.ca.gov>

Kent,

Confirming receipt of your comments. They will be provided to the Planning Commission at their meeting tonight.

Garry Rees, AICP
Principal Planner

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Geosciences, Planning & Permitting, Surveying
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(707) 441-8855

From: Kent Sawatzky <kentsawatzky@hotmail.com>
Sent: Monday, October 28, 2024 8:18 AM
To: Garry Rees <grees@shn-engr.com>
Subject: Fw: City of Blue Lake Housing Element Negative Dec

> **CAUTION:** This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning Garry,
Please include this at tonight's Blue Lake PC meeting. Please confirm receipt of this request.
Kent Sawatzky

From: Kent Sawatzky <kentsawatzky@hotmail.com>
Sent: Monday, October 28, 2024 8:16 AM
To: Anali Gonzalez <adminasst@bluelake.ca.gov>
Subject: Fw: City of Blue Lake Housing Element Negative Dec

Good morning, Anali

Please forward this to the planning commission as public comment. Please confirm receipt of this request. Thank you.
Kent Sawatzky

Subject: Fw: City of Blue Lake Housing Element Negative Dec

Dear planning commissioners,
These are my comments on items # 4, and #6 on tonight's agenda.

Item # 6;
After you reading, and understanding the approximately 341 pages of the Regional Climate Acton Plan. I shall attempt to give you an executive summary.
Blue Lake is the only participant who has not approved the plan in all of Humboldt County. County staff was on the Zoom meeting the whole Blue Lake City Council meeting last Tuesday to present to Blue Lake City Council.
It is more than embarrassing, that in speaking with Humboldt County Director John Ford, The other participants led by the County are moving forward without the City of Blue Lake participation. I guess "Better late than never" would apply under these sad circumstances. I guess that the City of Blue Lake may be perceived to think saving our planet is of minimal importance.

Item # 4;
After you reading, and understanding the approximately 142 pages of the City of Blue Lake General Housing Element Update. You should be asking the question "When are the promised Town Hall meetings to take place that have been justifiably promised, and expected by the Public to take place?
We can agree or not, but as structured, the need for a Blue Lake Planning Commission, including planning and public participation is being all but replaced by staff that would make the decisions thru a consistency process.
One of the determinations would be as stated in multiple locations thru out the document such as the #1 objective on page 19 of the update. You may wish to pay special attention to Items HP 1.1 thru HP 1.7. It should be the PC's duty to determine if projects within the City are consistent with "Blue Lake 6th Cycle Housing Goals, Policies, and Implementation Programs" on a project-by-project basis. That is why we have you to do that job rather than an unelected, or even appointed City Staff member.
An example would be on page 19 "Goal HG-1 Community Housing Policies"
HP-1.1, the first on the list, reads as follows;
"Review all new residential development to be consistent with the existing small-town character of the community and blend existing development, as well as to insure sustainability, and environmental protection"
The Planning Commission should determine the method, and make the consistency determination.
The common sense basis for this should possibly be as follows; We do not have any three-story residential buildings in Blue Lake. Therefore, the maximum height should be two stories.
We only have one residential building in Blue Lake in excess of 5 units (That is a ten plex). Therefore, the maximum residential developments should be somewhere in the five to Ten range.

I would read goals HP-1.1 thru HP-1.7. These are the things the people's representatives, "The Blue Lake Planning Commission" were appointed to implement. That is the reason we have a planning Commission.

The draft you received needs to have major updates. Many of the deliverables are required to be implemented by December 31st 2024. That is not possible. I assume you, and I know the public, would like to see an updated version prior to consider making a recommendation to the Blue Lake City Council. The public should have the opportunity to make comments on the updated draft prior to any recommendation to the Council. That is the required process.

The following are come comments sent to planner Rees;

Planner Rees,
The following are my comments on the City of Blue Lake Housing Element Negative Dec.
This Housing Element has the most effect on the City of Blue lake environmentally, and Socially in the History of Blue Lake Planning process. It deserves a full EIR at this time for the following reasons;

#1 as per this document, it states 4. "The project area is the entire City of Blue Lake"

#2 as per this document, it states 6. "General Plan Designation, City wide"

#3 as per this document, it states 7. "Zoning, City wide"

The only other Planning document that reaches this level of necessary review is a General Plan Update, which has been needed for many years, insofar as it is no where near internally consistent. And which many of the parts to this update are predicated upon. There is no legal foundation for this update. And this Housing Element should not move forward until the General plan Zoning and Land use are updated and approved. One EIR may suffice for both. And would likely be the best path. forward. Both the General Plan update and the Housing Element update to be approved at the same time.

This Housing Element. as proposed does not take into account the necessary CEQA analysis of Cumulative Effects. and violates one of the primary requirements of CEQA disallowing a piecemeal approach to land use determinations. It is designed to promise project by project CEQA evaluation, (Piecemealing). It goes one step further and does not give CEQA evaluation base on an exclusion for CEQA as "Infill". the effect is to eliminate any CEQA review at any phase, and therefore the only time to allow the Public, The Planning Commision, or the Blue Lake City Council can participate is now with a full EIR reflecting gigantic cumulative effects on the Environment
The truth be know a 12' by 12' shed within the setback require would get more public input and Environmental review than a 300-unit apartment housing project..

The only person to conduct a consistency determination would be the Director of Planning. At this time that would be Mr. Garry Rees. The people's participation would be all but eliminated along wit CEQA review. This would potential have untold negative effect on the Environment public participation, and therefore faith in the land use system.

#4 as per this document page 7 states "Any by-right project proposed on a property that the combining zone has been applied to would not be subject to CEQA"

#5 as per this document page 8 states "Objective standards are defined as those that involve no personal or subjective judgement by a public official"

#6 The City will amend all zones that reference the guidelines (for example MU, RC etc.) to make it clear that they are recommended and not enforceable standards of the Zoning code.
The question should be answered what is the "etc."? And why are the current regulations not required as the public expects and has been promised?

#7 as per the document page 43 falsely states that none of the21 items listed in the checklist would be significantly affected.
There is no way to state this without a full EIR. We do not know the potential cumulative effect because there is no analysis of what the potential total additional housing units may potentially be added. What is that number?
The public can not make informed comment without that analysis. It appears that the population of Blue Lake under this Housing Element could increase by 50%. There is no rational that would justify that would have no significant effect on a majority of the 21 items listed in the checklist on page 43.

For the above and more similar items this Housing element update requires the City do its duty to the environment and to the public and Do a full EIR, rather than a negative dec.
Kent Sawatzky

Planning Commission Meeting/October 28, 2024

RE: Agenda Item 4. Discussion: General Plan Housing Element Update/Negative Declaration

From: Lisa D. Hoover

The summary table in the Housing Element Update 2024 document, webpage. 43 (see clips 1 and clip 2 below), that includes of the Environmental Factors (e.g. biological resources, geology/soils, hazardous materials, transportation/traffic) potentially affected indicates that ALL impacts are "less than significant", thus the determination is that the "proposed project COULD NOT have a significant impact on the environment and a negative declaration will be prepared". A summary of the "Mandatory Findings of Significance" (webpage 129) reiterates "less than significant" perspective (see clip 3 below).

Yet, the evaluation of "less than significant" applied to all environmental factors is not in keeping with components of the housing element update or the Biological Resources Assessment of 2023 (the latter focused on the Taylor Way developments) that identifies mitigations that should be identified as a condition of approval. Following are clipped statements from the Housing Element:

Pg. 58 of the Housing Element Update states:

> Future residential development may have the potential to result in significant impacts to special-status species and sensitive natural communities such as riparian habitat and federally protected wetlands. However,
>
> compliance with existing federal and state laws and regulations, including but not limited to those listed above in the discussion of Regulatory Framework, would result in the avoidance and/or minimization of direct and indirect impacts to special-status species and sensitive habitats. These regulations require site-specific analysis where a project site contains potential habitat for special-status species including wetlands and riparian areas.
>
> Based on the result of the site-specific analysis and where appropriate, federal and State agencies will require mitigation for project-level impacts. In compliance with existing laws and regulations, the Housing Element

In none of the tables of the Housing Element Update that summarize potential environmental effects was a determination made consistent with "the potential to result in significant impacts…" (statement above). Why wasn't the determination option, "Less than Significant with Mitigation Incorporated" applied to a particular action, when in fact, mitigations will be needed? Example, from Table 21 of the Housing Element update- "Inventory of Vacant Land Available for Residential Development" a multiple-family housing density is assigned to a lot that has the following site constraints documented in the table: *Lot shape, creek corridor, creek setback, riparian habitat, flood zone.* In spite of these site constraints identified in the document, the Housing Element Update does not even acknowledge that mitigations would be needed related to the "Hydrology and Water Quality" element (webpage 88).

The need for mitigations is also supported in the Biological Resources Assessment (February 2023) for Taylor Way developments as well. The document states that recommendations to reduce potential direct and indirect adverse affects be included as a "condition of approval of the project". Some examples:

- For direct and indirect impact to special-status bird species that could migrate into the study area or establish nest sites, species surveys should be done prior to any land disturbance, and appropriate mitigations applied.
- For potential indirect effects on water resources (streams and associated riparian habitats, riverine system) such as compromising surface water quality by sediment transport from disturbed soils or disturbed by release of hazardous materials as a result of construction.

These are examples of environmental effects that were assigned a "Less than Significant" determination in the Housing Element Update when they actually need mitigations incorporated to reduce negative impacts and should be documented as such.

Another environmental factor in the Housing Element Update relates to direct and indirect effects of the proposed housing element titled "Population and Housing" (see clip 4 below). This factor would apply to any future growth such as new homes and businesses, (including recreational development), specifically, cumulative effects of foreseeable future actions that may affect roads, traffic, and ingress/egress into and out of the town. The Housing Element states that this item is "Less Than Significant" but this is not substantiated nor has the Circulation Element of the General Plan been updated since 1986.

Related to the Housing Element's Truck/Industrial Policy (webpage 113) and residential lot density it states:

Circulation Element - Truck/Industrial Policy: Policy 23. As long as the City uses the existing truck route, the City should consider minimizing potential densities for residential lots within one local street or one block of Greenwood Avenue.

Currently there is a multi-family development under construction within "one block", west of Greenwood Avenue. This policy was not applied to this setting so that sheds doubt on whether other parcels on/proximal to Greenwood Avenue identified in the other vacant sites/underutilized sites Table 21 of the Draft Housing Element would be applied. Are these lots identified for multi-family developments?

I would ask that the Planning Commission and Planning Staff revisit these elements of the General Plan Housing Element and pause on the intent to adopt a negative declaration until the "less than significant" determinations (examples above) are better substantiated and/or changed to include text related to the need for mitigations ("mitigations incorporated"). I would also ask for a pause on adoption in light of residential, business… developments currently discussed by the City as such developments will have cumulative effects on the "Population and Housing" and the "Circulation" elements included in the document as well as other environmental elements (e.g. biological resources, hydrology, hazardous materials). Related is the need to update the Circulation Element of the General Plan to factor in an analysis that incorporates the proposed developments (residential etc) and zone changes.

Respectfully submitted,

Lisa D. Hoover

1. From the Housing Element Update: webpage 43. Summary of Environmental Factors

4. Environmental Factors Potentially Affected

This Project would potentially affect the environmental factors checked below, involving at least one impact that is "potentially Significant" or "less than Significant with Mitigation Incorporated" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agricultural / Forestry Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology / Soils	☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials
☐ Hydrology / Water Quality	☐ Land Use / Planning	☐ Mineral Resources
☐ Noise	☐ Population / Housing	☐ Public Services
☐ Recreation	☐ Transportation / Traffic	☐ Tribal Cultural Resources
☐ Utilities / Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance
☒ None		

DETERMINATION

On the basis of this Initial Study:

☒ I find that the proposed project COULD NOT have a significant effect on the environment and a NEGATIVE DECLARATION will be prepared.

From the Housing Element Update: webpage 63, Biological Resources

Biological Resources

Would the project:	*Potentially Significant Impact*	*Less Than Significant With Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife services?	☐	☐	☒	☐
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

3. **From the Housing Element Update: Webpage 129, summary of Mandatory Findings of Significance**

Mandatory Findings of Significance:

	Potentially Significant Impact	*Less Than Significant With Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☐	☒	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly	☐	☐	☒	☐

4. **From the Housing Element Update: Webpage 103, Summary of the Population and Housing Element**

Population and Housing

Would the project result in:	*Potentially Significant Impact*	*Less Than Significant With Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Outlook

Re: Draft Housing Element_chance to meet or converse

From ldiane <ldiane@sonic.net>
Date Thu 11/14/2024 5:41 PM
To Garry Rees <grees@shn-engr.com>

1 attachment (462 KB)
Comments_Planning Commission Mtg_10_28_24_Housing Element.docx;

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Garry,

I just returned today having been out of the area since Monday.

Since I could not make your office hours on Wednesday I am wondering if you can respond to the following questions prior to Monday's Planning Commission Meeting on the 18th?

I've attached my written comment submitted for the last Planning Commission Meeting. I am assuming that you were also provided these comments. Below are questions from the submitted comments that I hope you can address:

Question 1. How can the determination of "less than significant" for all environmental factors (see Housing Element webpage 43) apply when both the Housing Element (pg. 58) and the Biological Resources Assessment of 2023 (for Taylor Way) address environmental concerns that need to be addressed?

From pg. 58 of the Housing Element: "*Future residential development may have the potential to result in **significant impacts** to species-status species and sensitive natural communities such as riparian habitat and federally protected wetlands.*"

From the Biological Resources Assessment (February 2023), the document states that recommendations to reduce potential direct and indirect adverse affects be included as a "*condition of approval of the project*". (Examples in the attached letter pertain to special-status bird species and water resources).

Question 2. Given that there is a need to address environmental impacts and mitigations, why did neither the Biological Resources table (webpage 63) or the Mandatory Findings of Significance table (webpage 129) apply the "*Less than Significant with Mitigations Incorporated*" determination?

Question 3. The Circulation Element (while out-dated) states under the Truck/Industrial Policy, Policy 23 (webpage 113): "*As long as the City uses the existing truck route, the City should consider **minimizing potential densities for residential lots** within one local street or one block of Greenwood Avenue*". Why wasn't this policy applied to the lots that are currently slated for a multi-family development proximal to Greenwood Avenue (west side)? Will this policy apply to other vacant sites (Table 21) proximal to Greenwood Avenue?

Question 4: While the City must plan for RHNA's 5th and 6th cycle which equates to 34 units, why does the Housing Element update include 89 new units, 55 more than is needed to meet the 5th and 6th cycle?

Garry, I do not see the data to support that the Housing Element Update will not have a significant effect on some environmental factors without mitigations, in fact, as pointed out above, I see the opposite. Other items that are inconsistent or lacking documented support pertain to the Circulation Element and the RHNA housing unit assignment.

Your response, your clarifications as needed, would be appreciated.

Lisa Hoover

On 2024-10-30 15:35, Garry Rees wrote:

> Hi Lisa,
>
> My next office hours at the City are on Wednesday, Nov. 13th. My office hours happen on the 2nd and 4th Wednesday of each month.
>
> I don't believe there are any appointments scheduled yet for the 13th. If that day works for you, please call the front office at City Hall to get on the schedule.
>
> Thanks.
>
> **Garry Rees, AICP**
> Principal Planner
>
> Civil Engineering, Environmental Services,
> Geosciences, Planning & Permitting, Surveying
> www.shn-engr.com
> 812 W Wabash Ave, Eureka, CA 95501
> (707) 441-8855
>
> ---
>
> **From:** ldiane <ldiane@sonic.net>
> **Sent:** Wednesday, October 30, 2024 2:29 PM
> **To:** Garry Rees <grees@shn-engr.com>
> **Subject:** Draft Housing Element_chance to meet or converse
>
> > **CAUTION:** This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.
>
> Hello Garry,

Relative to the Planning Commission Meeting, there were questions that came up and I would like to go over some elements of my public comment with you (e.g. the likely need for mitigations for some of environmental factors, addressing cumulative effects versus the isolation of respective developments, the Greenwood Avenue item about minimizing density proximal to this avenue...).

Are there options to meet next Wednesday when I believe you are in Blue Lake?

Lisa H.

Attachment 5

Planning Commission Resolution No. 2-2024

RESOLUTION NO. 2-2024

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF BLUE LAKE RECOMMENDING APPROVAL OF A DRAFT NEGATIVE DECLARATION AND AMENDMENT OF THE HOUSING ELEMENT OF THE BLUE LAKE GENERAL PLAN FOR THE 2019-2027 PLANNING CYCLE (6th Cycle)

WHEREAS, the Blue Lake Planning Commission has before it for consideration the project defined as amendment of the Housing Element of the Blue Lake General Plan by adoption of the Housing Element Update, February, 2024, a copy of which is attached hereto and made a part hereof, to supersede the September, 2009, Housing Element Update, as amended; and

WHEREAS a draft negative declaration has been prepared with respect to said project pursuant to the California Environmental Quality Act (CEQA), and all notices have been given with respect to said negative declaration; and

WHEREAS, after due notice of hearing, a public hearing was held at the regular meeting of the Blue Lake Planning Commission on November 18, 2024, to consider the draft negative declaration and the said project; and

WHEREAS, at said public hearing, due consideration was given to the environmental effects of the said project and to all objections to said project, and the Planning Commission believes that the draft negative declaration should be approved, and the Housing Element of the Blue Lake General Plan should be amended as hereinafter set forth;

NOW, THEREFORE, be it resolved by the Planning Commission of the City of Blue Lake as follows:

1. The Planning Commission finds on the basis of the draft negative declaration and any comments received by the Planning Commission that there is not substantial evidence that the project will have a significant effect on the environment and recommends approval of the said negative declaration.

2. Pursuant to Government Code Section 65354, the Blue Lake Planning Commission hereby recommends to the City Council the amendment of the Housing Element of the Blue Lake General Plan by adoption of the Housing Element Update, February, 2024 to supersede the September, 2009, Housing Element Update, as amended.

3. The reasons for this recommendation are set forth in the draft negative declaration, in the staff report, and in the minutes of the Planning Commission meetings of October 28, 2024 and November 18, 2024 (Public Hearing), copies of which shall be transmitted to the Blue Lake City Council.

4. The Secretary of the Planning Commission is authorized and directed to transmit this resolution to the City Council of the City of Blue Lake.

RESOLUTION NO. 2-2024

INTRODUCED, PASSED, AND ADOPTED this 18th day of November 2024, by the following vote:

AYES:

NAYS:

ABSENT:

ABSTAIN:

_____
Chairman, Planning Commission,
City of Blue Lake

ATTEST:

_____
Secretary, Planning Commission

City of Blue Lake

PLANNING COMMISSION AGENDA REPORT

Item #:

Date: November 15, 2024

Item Subject: Battery Storage Project Presentation

Submitted By: Mandy Mager, City Manager

General Information:

In April of 2024, the City reclaimed control of the former Blue Lake Power Plant site; this property had been leased to Blue Lake Power for over 30 years. The property was reclaimed through a legal court proceeding, which essentially served as a tenant eviction.

For the last several years, the City has been planning for the eventual reclamation of the property, as well as acknowledging that the City would most likely be left with a large-scale clean-up obligation. The City has been estimating the clean up of the site to cost approximately $1 million and has been factoring this into ongoing development plans.

The City has undergone a large scale master planning exercise to identify development opportunities in the Powers Creek District, including the former plant site. The City received funding from EDA to conduct an economic analysis for the development of an RV park and campground, as well as other support economies.

Through this process, the City identified the opportunity to repurpose the existing transformer and substation on the power plant site for a battery storage project, and designed into the RV park and campground project the estimated footprint of this development.

The City has been working with Redwood Coast Energy Authority for several years to evaluate future options for the power plant infrastructure and has a signed MOU with RCEA to assist the City in attracting battery storage and other renewable projects to the site. The City has evaluated the installation of a large-scale solar project and it was deemed infeasible due to the cost of the installation and the fact that the installation would not be large enough to be economically feasible.

Recently, the City was approached by PowerTransitions regarding a battery storage project (BESS); the company is proposing to purchase six acres of the power plant property to install a two-phase BESS project. Phase 1 would include a 12MW BESS and the second phase would increase the project to a 100MW BESS. Under the proposal, PowerTransitions would appraise the City's

property and using the value of the land and infrastructure, would reduce the purchase price by the cost to fully clean up the property, including removal of the existing plant infrastructure, buildings and fuel pile. The City would be paid the residual value of the land.

Cleaning up the site will allow the City to move forward with recreation development in the district and will lift the current liability associated with the existing plant and the environmental impacts associated with the continued degradation of the site.

The battery storage project is consistent with the zoning for the property and issues related to noise can be mitigated to meet the noise standards established for the zone. Environmental issues related to BESS projects include the potential for fire; the proposed BESS project would meet all NFPA and building code standards, including container suppression systems. PowerTransitions is proposing a Lithium Iron-Phosphate project; this is a newer technology and to date this technology has recorded zero fires associated with the systems.

Options to address concerns related to the sale of City-owned property include deed restricting the property to limit future development, as well as granting the City the right of first refusal to purchase the property in the event that the Company decides to sell. Future rezoning of the property could further protect the development potential of the property to ensure future development meets the objectives of the City.

A BESS project will allow the City to repurpose the existing power infrastructure, will clean-up the property for additional development and will allow the City to participate in meeting renewable energy goals for our region and community.

Background Material Provided: PowerTransitions Presentation

Fiscal Impact: N/A

Recommended Action: Presentation/Discussion

Review Information:

City Manager Review: ☒ Legal Review: ☐ Planner Review: ☐ Engineer: ☐

Comments:

POWERTRANSITIONS

Presentation to the City of Blue Lake City Council

Redevelopment of Blue Lake Power

NOVEMBER 12, 2024

STRICTLY CONFIDENTIAL & PROPRIETARY

Agenda

I. About PowerTransitions

II. Our Development Proposal

III. Community Benefits

IV. Understanding Battery Storage

STRICTLY CONFIDENTIAL & PROPRIETARY

About Us

PowerTransitions Restores Tax Basis for Communities by Investing its Capital to Transition Retired Facilities to its Next Best Use

Our Mission:

- Acquire and redevelop **Retiring** or **Retired** legacy power and industrial facilities in the U.S.
  - Restore **local communities with**
    - **tax basis restoration,**
    - **site cleanup,**
    - **jobs**
  - Clean these sites **aesthetically and environmentally.** We take the Costs, Risks, and Liabilities to ready legacy facilities for renewables
  - **Invest our capital** to create **utility-scale** renewable power solutions and, where appropriate, ready these facilities for other next-best use

Who We Are – Select History of PowerTransitions

2009-2015

CAMS
Consolidated Asset Management Services

S&S Deconstruction Brownfield Redevelopments

Key Project: Managed Liabilities for Southeast Texas Natural Gas & Renewable Generation Portfolio

Key Project: ELT Acquisition of State Line Generating Plant

2016-2023

REDEVELOPMENT CAPITAL PARTNERS

Formation of Redevelopment Capital Partners

Key Project: ELT Acquisition of Westrock Coshocton Paper Mill

Key Project: Cromby Power Facility acquired, managed & sold to 98six°

2023-2024

POWERTRANSITIONS

Founded by

EnCap Investments L.P.

Mar 2023
Funding secured

Feb 2024
Redevelopment at Vermont Yankee former nuclear plant site begins

Deep Power, Environmental & Brownfield Redevelopment Expertise

- **$100bn+ & 150+ Years** of Energy Transaction Experience, including Global Infrastructure Development
- **100+** Global Utility-Scale **Energy Projects**
- **$500m+** Environmental **Liabilities** Managed
- **30+ Large-Scale Brownfield Redevelopment Power & Industrial** Projects

TotalEnergies · DNV · EDF · aes · Bank of America · Deloitte. · Bechtel · Latham & Watkins LLP · Lazard · Duke Energy · Form energy · Clean Line Energy Partners · BioTherm Energy · Trailstone

Who We Are – EnCap Investments

EnCap Investments L.P.

- **PowerTransitions** is financially backed by EnCap Investments L.P.
- **EnCap** is a leading Energy & Energy Transition growth equity investment fund based in Houston, TX

1.9 GW Storage and Renewables in Operation and Construction

3 GW Storage and Renewables in Late-Stage Development

350+ Active Investors

275+ Top-Tier Management Teams Backed

$40B LP Capital Commitments

Active Energy Transition Investments

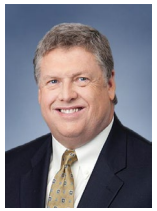
PowerTransitions
Arbor Renewable Gas
Bildmore renewables
Catalyze
SolarProponent
Parliament Solar
Linea Energy

Realized Energy Transition Investments

Broad Reach Power
Jupiter Power
Paloma Solar & Wind
Triple Oak

Energy Transition	Upstream	Midstream
2 Active Funds $1.7B of Capital Commitments	5 Active Funds *17 Total Funds* ~$24.5B of Capital Commitments	4 Active Funds ~$8.7B of Capital Commitments

EnCap Energy Transition Leadership

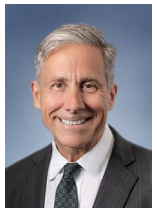


Jim Hughes
Managing Partner

Relevant Experience:
- First Solar
- AEI Services
- Prisma Energy
- Enron

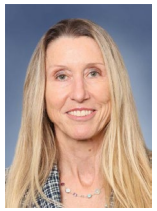
Tim Rebhorn
Managing Partner

Relevant Experience:
- Prisma Energy
- First Solar
- Quail Nuclear
- Resolutions Mgmt.



Shawn Cumberland
Managing Partner

Relevant Experience:
- Quinbrook Infrastructure
- Arctas Capital
- Enron



Kellie Metcalf
Managing Partner

Relevant Experience:
- Pattern Energy
- Barclays Bank
- Fortis Bank
- Florida P&L

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Our Development Plan

Our goal is to work closely with the City and community stakeholders to clean up the biomass site, to build energy storage and enable community development

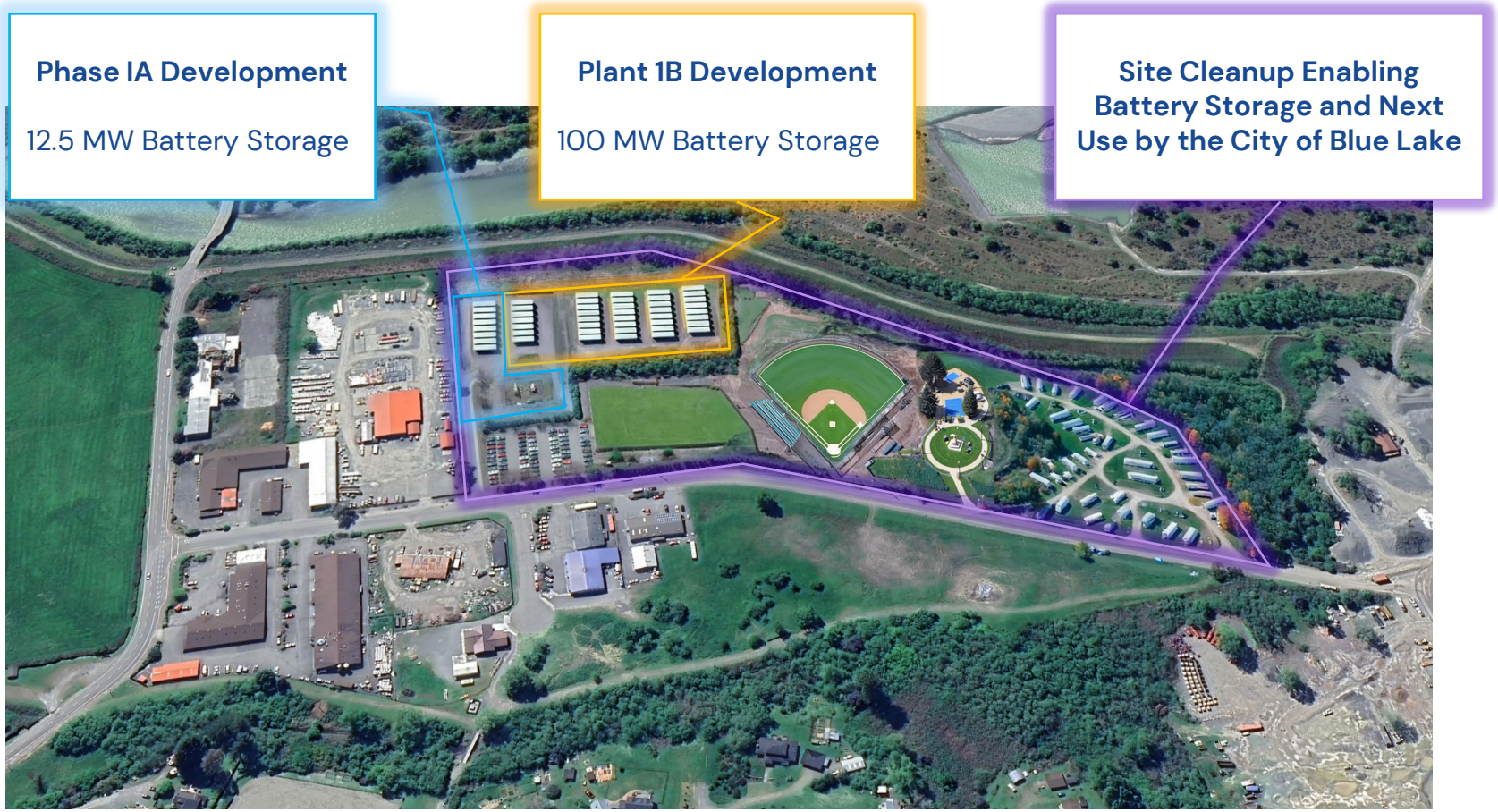
Our plan -

Phase IA Development

- ✓ Demo and remediate the existing biomass facility
- ✓ Develop 12.5MW battery storage

Phase IB Development

- ✓ Demo and remediate of the remainder of the site
- ✓ Develop ~100MW battery storage
- ✓ Support co-development of public projects



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Community Benefits

POWERTRANSITIONS

POWERTRANSITIONS

Powering Progress
Empowering Community

$175m+

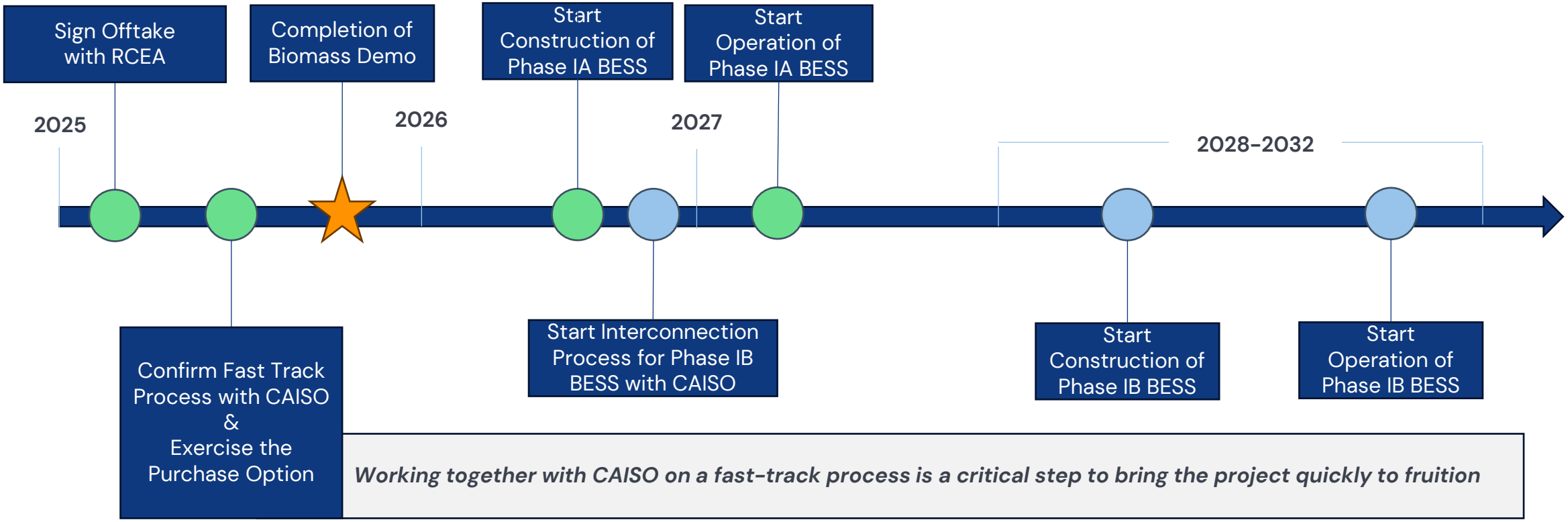
PowerTransitions Investment in the Community

Redevelopment Benefits

- ✓ Property taxes for the community
- ✓ Safe environmental cleanup of the site
- ✓ Local employment
- ✓ Local goods and services
- ✓ Support local grid resiliency and stability
- ✓ Meetings with and support for local schools and community organizations
- ✓ Education for the local community on sustainable energy

Project Timeline

Our redevelopment team will work together with the City to implement the development projects for the benefit of all stakeholders



Not to scale. For illustrative purposes

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What is Battery Storage

Think of Grid Storage as Your Phone Battery, But Bigger

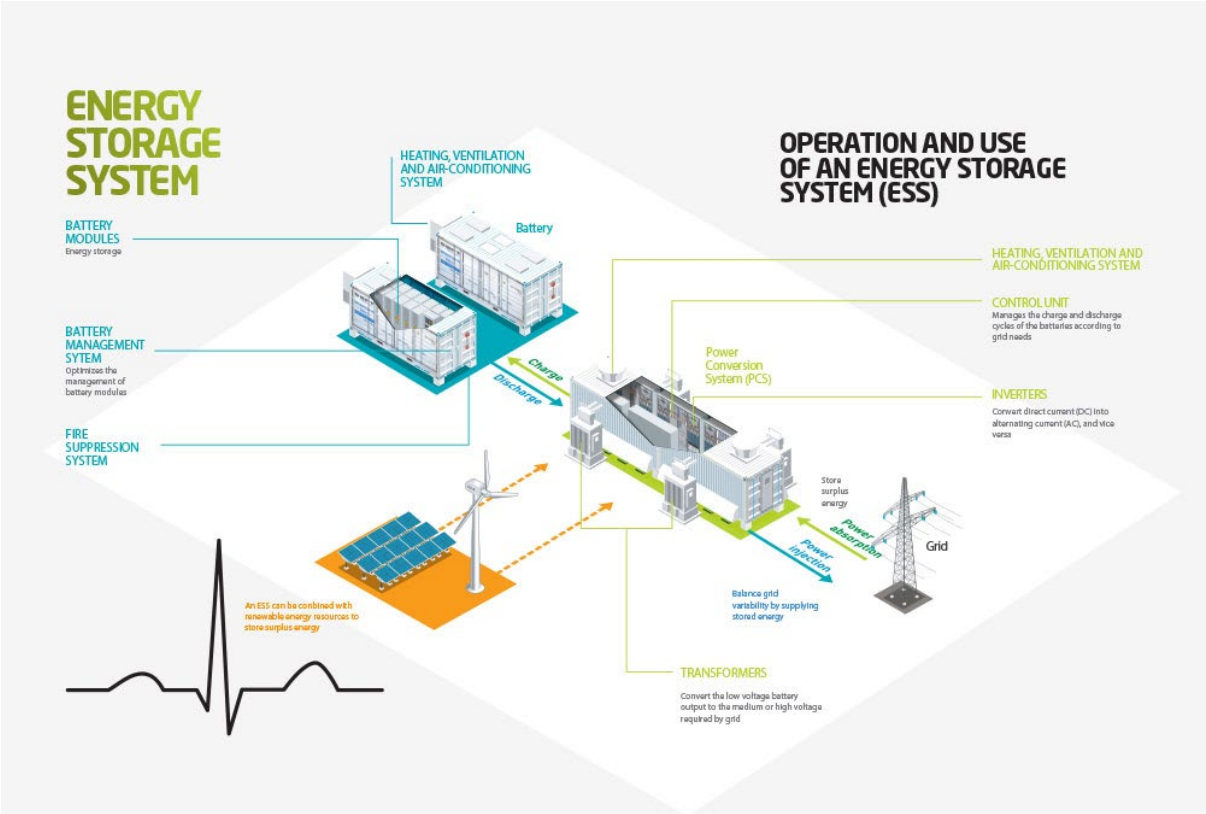
- Same basic technology as personal devices
- Captures electricity for use when needed
- Provides backup power and grid reliability

System Components

- Batteries and racks
- Inverters (DC to AC conversion)
- Monitoring equipment
- Safety systems
- Protective enclosures

Key Benefits

- Zero emissions
- No moving parts
- Enhances grid reliability
- Supports clean energy integration
- Reduces power outages



Battery Storage Lifecycle

Development Management:

Supplier Code of Conduct & Supply Chain Protocol

Human Rights and Labor Rights:

- Our company's Supplier Code of Conduct mandates respect for human rights and adherence to fundamental labor rights

Anti-Corruption

- Suppliers must comply with all anti-corruption laws

Traceability and Sustainability

- Our Supply Chain Protocol requires traceability of raw materials to ensure:
  - Social, environmental, and quality standards are upheld
  - Compliance with U.S. laws
  - Customs clearance for all equipment and components

End-of-Life Management:

Reuse and Recycle Protocol

Repurposing for Second-Life Applications

- Batteries with residual capacity can be used for less demanding applications

Recycling

- Valuable metals like lithium, cobalt, nickel, and manganese are recovered by specialized facilities for recycling
- Recovered materials can be used to produce new batteries, reducing environmental impact

Safe Disposal of Non-Recyclable Components

- Prevents environmental contamination from toxic substances

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Fire Protection and Safety

Ensuring safety of the community is our top priority

- This is why we're focused on lithium iron phosphate (LFP) technology
  - LFP is a significant evolution in energy storage relative to prior lithium-ion batteries in safety and performance
  - No fire incidents associated with LFP energy storage facilities
- Our team will work closely with the Blue Lake Volunteer Fire Department and other community stakeholders to:
  - design the safest layout
  - ensure superior equipment supply and operational excellence

Underwriters Laboratories (UL) 9540/A "Standard for Safety of Energy Storage Systems and Equipment"

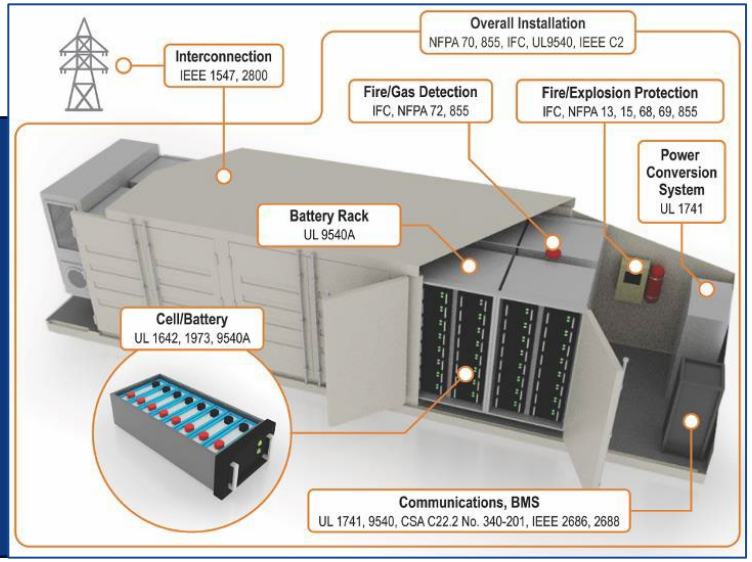
National Fire Protection Association 855

UL 1973 (battery) and UL 1741 (inverter) standards

National Electric Code 705 has expanded and applies to power-production systems connected to the electrical grid.

California Building Standards Code contains a wide range of valuable information for connecting electrical equipment including batteries.

The **California Fire Code** and **California Electrical Code** are important for the installation and operation of energy storage technologies.



Questions?

Powering Progress
Empowering Community

Thank You

POWERTRANSITIONS

Reconnecting Energy Communities for a Sustainable Future

www.power-transitons.com