



HUMBOLDT COUNTY ASSOCIATION OF GOVERNMENTS
Regional Transportation Planning Agency
Humboldt County Local Transportation Authority
Service Authority for Freeway Emergencies
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AGENDA ITEM 8a
HCAOG Board Meeting
September 18, 2025

DATE: September 10, 2025
TO: HCAOG Board of Directors
FROM: Brendan Byrd, Executive Director
SUBJECT: **Preferred Regional Housing Needs Allocation (RHNA) Methodology**

STAFF REPORT

Contents:

- Staff's Recommended Action
- Staff Summary
- Housing and Community Development's Regional Housing Needs Determination
- Jurisdiction Methodology Survey – Responses Received

Staff's Recommended Action:

1. Introduce the item as an action item;
2. Allow staff to present the item;
3. Receive public comment;
4. Discuss item and consider making the motion:
"I move that the HCAOG Board identify Alternative 1 as the preferred RHNA methodology, and increase to income category adjustment to 20-percent."

Staff Summary:

Regional Housing Needs Determination

The State of California, since 1980, has required each town, city, and unincorporated area to plan for its share of the state's housing need for people of all income levels. This requirement, known as the Housing Element Law (Chapter 1143, Statutes of 1980; AB 2853), includes a process called the Regional Housing Need Allocation. HCAOG is required under California Government Code Section 65584 to prepare a Regional Housing Needs Allocation Plan (RHNP) for the Humboldt County Region. Based on the adopted RHNP, each city and county must update the

housing element of its general plan to demonstrate how the jurisdiction will meet the expected growth in housing need over a specified planning period. HCAOG received the Cycle 7 Regional Housing Needs Determination (RHND) from the California Department of Housing and Community Development (HCD) on July 15th 2025, which is included as an attachment to this staff report. The attached RHND is the same that was reviewed by the Board at the August meeting. As indicated in the final determination from HCD, the eight (8) year projection period begins June 30, 2027 and ends July 15, 2035. The allocation is based on California Department of Finance (DOF) population and household formation rate projections/estimates, in addition to a number of household unit adjustments applied by HCD, including most notably:

1. Owner/Renter property vacancy rate adjustments
2. Overcrowding and cost burden adjustments
3. Jobs/Housing balance adjustments
4. Homelessness Adjustments
5. Demolition and state of emergency adjustments

Each of the adjustments applied by HCD, and the underlying data, was presented in detail by HCD staff during their presentation to the HCAOG Board at the August 21st meeting. The two tables shown below summarize the household unit allocations for the Humboldt region from HCD. The first table shows the total number of units included in the allocation, itemized by the adjustment category. The second table shows the total number of units per each income category.

HCAOG Regional Housing Needs Determination June 30, 2027 – July 15, 2035 (8 years)		
1.	Estimate County Population: June 30, 2035	131,962
2.	<i>- Group Quarters Population (those not requiring housing)</i>	-4,813
3.	Household (HH) Population (net population requiring housing)	127,149
4.	Projected Households	58,396
5.	+ Owner Vacancy Adjustment (0.99%)	+324
	+ Renter Vacancy Adjustment (3.55%)	+907
6.	+ Overcrowding Adjustment	+349
7.	+ Cost-burden Adjustment	+3,639
8.	- Cost-burdened and Overcrowded Households (DOF data)	-349
9.	+ Replacement Adjustment Demolitions (.10%)	+58
10.	+ Replacement Adjustment Seasonal, Recreational, and Occasional Use (2015 vs. 2023) (0.0%)	+0
11.	+ Jobs Housing Relationship Adjustment	+0
12.	+ Homelessness Adjustment	+769
13.	+ State of Emergency Adjustment	+0
14.	<i>- Occupied Units (HHs) estimated projected June 30, 2027</i>	-58,131
16.	+ Feasible Jobs/Housing Balance Adjustment	+0
Total	7th Cycle Regional Housing Need Assessment (RHNA)	5,962

HCAOG Regional Housing Needs Determination June 30, 2027 – July 15, 2035 (8-years) Total Housing Units Per Income Category		
Income Category	Percent	Housing Unit Need
Acutely Low	9.4%	562
Extremely Low	14.5%	866
Very-Low	10.5%	627
Low	17.8%	1,064
Moderate	9.5%	565
Above-Moderate	38.2%	2,278
Total	100.0%	5,962

As shown in the first table above, the total regional allocation is 5,962 household units over the planning period. Of the 5,962 units, 5,697 are a result of adjustments as determined by HCD, and 265 are a result of projected population growth as estimated by DOF. In general, what HCD and DOF have determined through HCAOGs RHNA Cycle 7 RHND is that projected population growth over the 8-year period is not the region's primary driver for housing need. The primary driver for housing need is increased housing stock in all affordability categories, in order to reduce local housing costs. The second table is also directly from Humboldt's RHND, which further splits the total allocation into income categories. Each income category is defined by the Health and Safety Code as follows:

- Acutely Low income: 0%-15% Humboldt's median family income (MFI) of \$88,300
- Extremely Low income: 15%-30% of MFI
- Very Low income: less than 50% of MFI
- Low income: 50% to 80% of MFI
- Moderate income: 80% to 120% percent of MFI
- Above Moderate income: above 120% MFI

For some historical context, the total number of units assigned to Humboldt County in RHNA Cycle 7 is the largest allocation since Cycle 2 in the early 1990's. A comparison from the previous RHNA cycles is as follows:

	Planning Period (PP)	HCD Allocation/PP	Annualized RHNA
CYCLE 2	12/31/90-6/30/97	5,984/6.5 years	921/year
CYCLE 3	12/31/00-6/30/08	3,975/7.5 years	530/year
CYCLE 4	12/31/06-6/30/14	4,747/7.5 years	633/year
CYCLE 5	12/31/13-6/30/19	2,060/5.5 years	375/year
CYCLE 6	12/31/18-8/31/27	3,390/8.7 years	390/year
CYCLE 7	6/30/2027-7/15/2035	5,962/8 years	745/year

Development of Regional Housing Allocation Methodology

The state-mandated RHNA process (Government Code Sections 65580 *et seq.*) requires HCAOG to develop a methodology that determines how to divide the overall allocation that the region receives from HCD to local jurisdictions. This includes dividing the total number of units

allocated to the seven incorporated Cities and the County and also balancing the number of units required in each income category. Section 65584.04(d) states that HCAOG shall include the following factors to develop the methodology that allocates regional housing needs, “to the extent that sufficient data is available from local governments or other sources.” The list has been paraphrased for additional clarity.

1. The jurisdictions jobs and housing relationship
2. Constraints due to sewer, water, land suitability or preservation, evacuation route constraints, or climate change risks (i.e. sea level rise, wildfire risk)
3. The distribution of household growth that provide opportunities to maximize the use of public transportation and existing transportation infrastructure
4. Agreements between a county and cities in a county to direct growth toward incorporated areas of the county
5. The loss of units contained in assisted housing developments
6. High housing cost burdens (rate of households paying over 30% and over 50% for housing)
7. The rate of overcrowding
8. Housing needs for farm workers
9. Housing needs generated by Cal Poly Humboldt
10. Housing needs for homeless population
11. Loss of housing units during a state of emergency as declared by the Governor that have yet to be rebuilt
12. The region’s greenhouse gas emissions targets
13. Any other factors that should be considered or adopted by the Council of Governments.

To ensure that regional jurisdictions are included in the methodology development process, it is a requirement that HCAOG survey each local jurisdiction in regards to the questions noted above. On July 10th, HCAOG staff sent out a survey to each local jurisdiction. Responses were received from Trinidad, Arcata, and Ferndale and a summary of the responses has been included as an attachment to the staff report. Staff will note that only a few responses to the survey were formally received, all member agencies regularly participated in the regional working group (which worked through methodology recommendations), which is discussed further below.

Additionally, it is also a requirement that an allocation methodology developed by any Council of Government for a region satisfy the RHNA Objectives per code section 65584(d), as listed below:

1. Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low and very low-income households. The regional housing needs allocation plan shall allocate units for extremely low and acutely low-income households in a manner that is roughly proportional to, and within a range of 3 percent of, the housing need for very low income households.
2. Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, and the encouragement of efficient development patterns, and the achievement of the region’s greenhouse gas reduction targets provided by the State Air Resources Board pursuant to Section 65080.

3. Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.
4. Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the countywide distribution of households in that category from the most recent American Community Survey.
5. Affirmatively furthering fair housing.

To aid in the development of the allocation methodology recommended by HCAOG, staff began meeting with the ‘RHNA working group’, which is composed of Community Development staff from each HCAOG member agency. These meetings began in June of this year, and through several meetings have reviewed the RHND, changes to the RHNA guidelines and California Code, and have worked through various alternative allocation methodology options. Although the working group considered incorporating other jurisdictional factors into the allocation methodology, such as Opportunity Score or land availability/constraints, HCAOG staff and the regional working group are recommending a base allocation methodology that uses only the distribution of regional jobs and population. These two factors are based on readily available data for all jurisdictions, and the data comes from the state so it is robust and defensible.

Staff recommend continuing to use an agency’s percentage of regional jobs as an allocation factor, given that locating housing near jobs is consistent with state and local infill goals and also helps to advance additional issues such as greenhouse gas and vehicle miles traveled (VMT) reductions. Staff also recommends allocating housing units to agencies based on their respective percentage of the counties total population, as this helps to allocate housing units in an equitable fashion. Additionally, allocating units based on existing populations will directly address the issue of cost-burden, vacancy rate, and overcrowding, (all of which are housing supply issues) which as shown in the RHND is the largest issue facing the local housing market. Similar to previous cycles of RHNA, HCAOG staff initially developed allocation scenarios, each with different weighting percentages for jobs and populations. Both scenarios are listed below:

Alternative 1: Weighting jobs at and population at 50%

Agency	2022 Employment Data	DOF Population (1/1/2012)	Jobs Distribution	Population Distribution	Jobs-Pop Allocation %	Jobs-Pop RHNA
Arcata	9,839	19,001	20.7%	14.2%	17.5%	1,042
Blue Lake	252	1,136	0.5%	0.8%	0.7%	41
Eureka	18,424	26,122	38.8%	19.5%	29.2%	1,740
Ferndale	427	1,361	0.9%	1.0%	1.0%	57
Fortuna	3,300	12,198	7.0%	9.1%	8.0%	479
Rio Dell	359	3,232	0.8%	2.4%	1.6%	95
Trinidad	330	296	0.7%	0.2%	0.5%	27
Unincorporated County	14,501	70,471	30.6%	52.7%	41.6%	2,481
Totals	47,432	133,817	100.0%	100.0%	100.0%	5,962

Alternative 2: Weighting jobs at 60% and population at 40%

Based on 2025 DOF Population & 2022 LEHD LODS Work Area Data					Alternative 2	
Agency	2022 Employment Data	DOF Population (1/1/2012)	Jobs Distribution	Population Distribution	Jobs-Pop Allocation %	Jobs-Pop RHNA
Arcata	9,839	19,001	20.7%	14.2%	18.1%	1,081
Blue Lake	252	1,136	0.5%	0.8%	0.7%	39
Eureka	18,424	26,122	38.8%	19.5%	31.1%	1,855
Ferndale	427	1,361	0.9%	1.0%	0.9%	56
Fortuna	3,300	12,198	7.0%	9.1%	7.8%	466
Rio Dell	359	3,232	0.8%	2.4%	1.4%	85
Trinidad	330	296	0.7%	0.2%	0.5%	30
Unincorporated County	14,501	70,471	30.6%	52.7%	39.4%	2,350
Totals	47,432	133,817	100.0%	100.0%	100.0%	5,962

Staff will note that in past RHNA cycles HCAOG has considered a third alternative, which weighs population at 60% and jobs at 40%. Staff and the working group felt that this alternative did not need to be brought forward to the HCAOG Board, as providing an alternative that reduced the weighting of the region's jobs was not consistent with the region's infill goals. After several discussions on the allocation methodology, HCAOG staff and the working group recommend that Alternative 1 be identified as the preferred allocation methodology. By equally balancing weighting for population and jobs, HCAOG's allocation methodology will be equitable, will address the root cause of cost burden and vacancy rates in all of the county's jurisdictions (by increasing the potential housing stock countywide), and will focus on providing more housing in the counties job centers.

The second component of the regional allocation is to transform each agency's total RHNA allocation into a distribution of units based on income categories. To perform this portion of the allocation, HCAOG has traditionally initially assigned each agency a total number of units in each income category that is equal to the regionwide average (percentage), which is then adjusted by a factor based on how high, or low, an agency is currently performing at providing housing within that income level. In past cycles, the correction that was applied to each agency was equal to 10% of the difference between the agencies' existing housing stock versus the regionwide average. In initial discussions with the working group, HCAOG staff is recommending increasing the correction factor to 20%. Doing so would further emphasize the need to diversify the housing opportunities across all agencies. An example summary table showing each agencies draft unit allocation per income category is shown below. Staff will note that the table only shows the unit allocations for Alternate 1 (50%/50% weighting), and that if Alternative 2 was selected this table would vary slightly.

Jurisdiction	Acutley Low (0% - 15% MHI)	Extremely Low (15% - 30% MHI)	Very Low (30% - 50% MHI)	Low (50% - 80% MHI)	Moderate (80% - 120% MHI)	Above Moderate (120%<MHI)	Total Jurisdictional Allocation
Arcata	90	135	103	201	100	413	1,042
Blue Lake	3	7	4	7	4	16	41
Eureka	175	258	179	307	171	650	1,740
Ferndale	8	6	6	10	5	22	57
Fortuna	45	70	50	93	46	175	479
Rio Dell	8	14	8	16	10	39	95
Trinidad	4	4	5	7	3	4	27
County	229	372	272	423	226	959	2,481
Total	562	866	627	1,064	565	2,278	5,962

As part of the presentation of this item, HCAOG staff will be seeking that the Board provide direction on a preferred alternative for the RHNA methodology. This will include identifying a preferred alternative as noted above (Alternatives 1-2) and providing concurrence on the increase to the correction factor for applying an agency's units to each income category. Should the Board elect to select a preferred alternative, staff anticipate the 60-day public comment period will commence the week of September 22nd, with a notice published in the local paper, posting on the HCAOG website, social media and outreach to individuals who have expressed interest in the RHNA process. Staff will also provide direct written notice to each of HCAOG's member agencies, which will help to further foster discussions at the local agency elected level.

As part of the public review period, a public hearing will be held at the October 16th HCAOG Board meeting, which will incorporate any public comment received prior to that meeting. After the conclusion of the 60-day public comment period in late November, HCAOG staff will incorporate any final public input into a Draft RHNA methodology that will be presented to the Board for adoption at the December 18th HCAOG Board meeting. If the methodology is approved at the December meeting, HCAOG staff will notify all of the jurisdictions of the HCAOG Board action. That will begin an additional 60-day appeal period wherein a local government may request a revision. If no revision is received, a final RHNP will be presented to the HCAOG Board for adoption. Updated Housing Elements by local governments are due to HCD by July 15, 2027.

Survey of RHNA Data

As part of the Regional Housing Need Allocation (RHNA) process, HCAOG is required to survey local governments for information on specific factors to be considered in developing the allocation methodology. By law, none of the information may be used as a basis for reducing the total housing need established for the region.

(Fill in form online and email to brendan.byrd@hcaog.net with a copy to amy.eberwein@hcaog.net)

Jurisdiction: City of Arcata

Name/Title: Jennifer Dart, Deputy Director & David Loya, Director

(1) Your jurisdiction's existing and projected jobs and housing relationship

Arcata is expected to continue growing in population and housing at a faster pace than job growth. While recent data shows the city lost 523 jobs since 2015, there are currently vacancies in retail and industrial areas that present opportunities for economic growth. Arcata is actively developing strategic plans for both economic and housing development and anticipates several new projects during the upcoming eight-year cycle.

(2) Constraints due to sewer, water, developable land suitability or preservation issues, emergency evacuation route capacities, or climate change risks

Arcata is fairly built out - vacant developable land is largely lacking. Most development will be infill redevelopment.

Sea level rise is the primary climate change risk for Arcata. Fire is increasingly a risk.

(3) The distribution of household growth that provide opportunities to maximize the use of public transportation and existing transportation infrastructure

The City is concentrating on infill where existing transportation and transit exists.

(4) The market demand for housing

Demand is high. Arcata struggles to meet above moderate income housing need.

(5) Agreements between a county and cities in a county to direct growth toward incorporated areas of the county, or ballot approved measures to preserve agricultural land

There are no explicit agreements.

(6) The loss of units contained in assisted housing developments

The City has not lost any contractual affordable housing. The Humboldt Plaza renewed for a 20-year term. There are no pending City assisted (HOME/CDBG/RDA) projects pending term expiration during the 7th Cycle.

(7) High housing cost burdens (specifically those households spending over 30% of their income on housing)

Housing cost burden is an issue in Arcata, with approximately 50% of households spending over 30% of their income on housing (per U.S Census 2023 ACS Data). We would like to review Arcata specific data from the DOF, but were unable to locate it on their website. Arcata's high housing cost burden is partly explained by its housing tenure composition. In Arcata, 64% of households are renters and 36% are homeowners, whereas nationwide, the split is roughly 66% owners to 34% renters. Nationally, 49.5% of renters spent more than 30% of their income on housing in 2023 (ACS data). Given Arcata's higher proportion of renters, who are generally more likely to be cost-burdened, its overall housing cost burden, while higher than the national average, is not disproportionately elevated when the city's housing mix is taken into account.

(8) The rate of overcrowding

Overcrowding does not appear to be a significant issue in Arcata with 2.7% reporting 1.5 occupants per room based on US Census data from the 2023 ACS update.

(9) The housing needs of farmworkers

Arcata's proximal major farm, Sun Valley Floral, closed recently, which reduced significantly the need for FWH.

(10) Housing needs generated by the presence of Cal Poly Humboldt.

The City of Arcata hosts a significant portion of the Cal Poly Humboldt student population. The University is currently developing 241 units at the former Craftsman's Mall site, which are expected to accommodate up to 964 students upon completion in Spring 2026. While these units cannot be credited toward the City's Housing Element RHNA targets, they are anticipated to ease demand in the local student rental market and may indirectly help stabilize rental housing availability in the community.

(11) The housing needs for individuals and families experiencing homelessness

In the 2024 Point-In-Time (PIT) Count, 533 of the 1,573 individuals experiencing homelessness in the region were counted in Arcata, accounting for approximately 34% of the total. While this reflects a concentration of need within the city, it also underscores Arcata's central role in the region's homelessness response system and highlights the importance of continued local and regional collaboration.

During the 6th Cycle Housing Element, Arcata created 138 units of housing for homeless and at-risk of homeless individuals using Homekey funding. Placement in these units is coordinated by the County Continuum of Care, ensuring a regionally integrated approach to supportive housing.

(12) The loss of housing units because of a state-declared emergency

None

(13) Local/regional constraints or policies relating to regional greenhouse gas emissions reduction targets

The City has a GHG reduction plan and is part of the countywide Climate Action Plan. The City focuses on infill development to meet its GHG targets.

(14) Any other factors that you believe should be considered.

The City of Arcata has exceeded its Cycle 6 RHNA targets in multiple income categories. Notably, the City has already met and surpassed its very-low and moderate-income goals and is projected to meet the low-income target by 2025. Arcata has permitted 85% (167 of 197 units) of the total very-low-income housing units in the 6th Cycle, and 40% of the total low-income units created in the County to date. During the 5th Cycle, the City exceeded its overall RHNA allocation by 107.2%. This strong track record should be a key consideration in determining Arcata's lower-income housing allocations in the 7th Cycle. The City Council has provided policy direction to de-emphasize the allocation factors that have historically resulted in disproportionate housing assignments to Arcata.

Additional Comments:

The Council remains committed to supporting affordable housing but emphasizes the importance of equitable distribution of housing responsibilities throughout the County.

Survey of RHNA Data

As part of the Regional Housing Need Allocation (RHNA) process, HCAOG is required to survey local governments for information on specific factors to be considered in developing the allocation methodology. By law, none of the information may be used as a basis for reducing the total housing need established for the region.

(Fill in form online and email to brendan.byrd@hcaog.net with a copy to amy.eberwein@hcaog.net)

Jurisdiction: City of Ferndale

Name/Title: Michelle Nielsen, Contract City Planner

(1) Your jurisdiction's existing and projected jobs and housing relationship

The City would like to attract more businesses to improve employment opportunities, especially those that are not significant departure from the existing mix in the community and surrounding areas. Also, the City would like to attract more families, especially those with school-age children to support enrollment in local schools.

(2) Constraints due to sewer, water, developable land suitability or preservation issues, emergency evacuation route capacities, or climate change risks

The City has a state and federally designated historic district on Main Street, and designated buildings outside the historic district, which adds complexity for adaptive reuse. The continuous and stable location of the Salt River is critical for the WWT plant to properly function. The City's primary evacuation routes, Fernbridge and Blue Slide Road, themselves are subject to hazards: Fernbridge stability and safety in the event of an earthquake and inundation during tsunami. Blue Slide Road can also experience stability and safety issues during/after earthquakes. Also both routes are located in the unincorporated area so the City is unable to directly affect improvements, although existing policies commit the City to cooperating with improvements to both. (Please see "Add'l Comments" for more info)

(3) The distribution of household growth that provide opportunities to maximize the use of public transportation and existing transportation infrastructure

The City is not served by public transportation, and this condition is not expected to change during the planning period of the 7th cycle.

(4) The market demand for housing

According to Realtor.com, the median listing home price in Ferndale was \$629K in June 2025, trending up 2.8% year-over-year. On average homes in Ferndale sell after 65 days on the market. The trend for median days on market in Ferndale has gone down since last month, and slightly up since last year (https://www.realtor.com/realestateandhomes-search/Ferndale_CA/overview).

(5) Agreements between a county and cities in a county to direct growth toward incorporated areas of the county, or ballot approved measures to preserve agricultural land

There are no agreements to direct growth to the City. No ballot measures that preserve agricultural land are in effect in the City.

(6) The loss of units contained in assisted housing developments

No units of Ferndale Housing (formerly Navy housing) have been lost during the 6th cycle planning period. (Ferndale Housing is owned and managed by the L.D. O'Rourke Foundation, a non-profit organization.) This is a 52 housing unit development, configured as duplexes, on 11.7 acres. The disposition of the property and housing by the federal government included deed restrictions ensuring use of the site for low and moderate income housing.

(7) High housing cost burdens (specifically those households spending over 30% of their income on housing)

Per the current CHAS for Ferndale (pulls from 2017-2021 data): approximately 220 (renter+ owner) households (HH) of the 600 Ferndale HH are cost burdened, or about 37%. Of those 220 HH, about 54 are extremely cost burden (paying greater 50% of HH income towards housing).

Per HCD's AFFH Data Viewer, renter HH are disproportionately cost burdened with almost 65% renter HH paying 30% of gross HH income for housing. Although at a lower rate, approx. 33% owner HH are cost burdened.

(8) The rate of overcrowding

The rate of overcrowding is less 5% per HCD's AFFH Data Viewer.

(9) The housing needs of farmworkers

Given the City's proximity to dairies, and other agricultural and timber working lands, it is expected there are employee, including farmworkers, housing needs. At this time the City does not have estimates, however.

(10) Housing needs generated by the presence of Cal Poly Humboldt.

Because Cal Poly Humboldt is about 30 miles from Ferndale (one-way) and Ferndale is not served by public transportation, the need for housing in Ferndale generated by Cal Poly is expected to be relatively low.

(11) The housing needs for individuals and families experiencing homelessness

On a preliminary and qualitative basis, City staff have not observed unsheltered individuals or households within City limits or near City limits. It is noted that the 2022 Point in Time (PIT) count found 64 individuals experiencing homelessness in the "Ferndale/Fortuna/Table Bluff" area. Source:

<https://humboldt.gov.org/DocumentCenter/View/107776/20220621---HHHC-Point-in-Time-Count-2022#:~:text=Approximately%201%2C309%20unsheltered%20people%20were,time%20the%20count%20took%20place.>

(12) The loss of housing units because of a state-declared emergency

During the 6th cycle's planning period, no housing units have been lost due to state-declared emergencies.

(13) Local/regional constraints or policies relating to regional greenhouse gas emissions reduction targets

Not at this time, although there is general concern that new policies and requirements for GHG reduction targets will increase the cost of new construction and substantial remodels. Also, many use buildings and structures use propane as a fuel source (including for heating). There is concern that policies and requirements (especially those that fast-track) that eliminate propane as a fuel source will be costly in terms of: the availability of a local supplier that is able to reliably meet local needs, the cost associated with installation of appropriate infrastructure, and the day-to-day cost of a new source. Also, all of the current dynamics at the federal level is creating a lot of uncertainty.

(14) Any other factors that you believe should be considered.

The need for housing that is affordable to residents, including for families who live in or would like to live in Ferndale, is recognized. City staffing resources are limited, nor does the City have land to surplus. A couple of years ago, the City reached out to several of the other larger jurisdictions about potentially assisting the City with administering its PLHA funding allocation (in return for the grant's general administration set aside), but those jurisdictions either did not respond or declined.

Additional Comments:

Q3 response continued: There are existing Citywide drainage issues, including localized flooding. Climate change models project that some neighborhoods may experience groundwater daylighting in the future.

Survey of RHNA Data

As part of the Regional Housing Need Allocation (RHNA) process, HCAOG is required to survey local governments for information on specific factors to be considered in developing the allocation methodology. By law, none of the information may be used as a basis for reducing the total housing need established for the region.

(Fill in form online and email to brendan.byrd@hcaog.net with a copy to amy.eberwein@hcaog.net)

Jurisdiction: City of Trinidad

Name/Title: Trever Parker, City Planner

(1) Your jurisdiction's existing and projected jobs and housing relationship

Many of Trinidad's jobs are lower-wage service jobs, and there is not enough affordable housing in the City to accommodate them. There is some affordable housing in the areas surrounding the City, and McKinleyville is 10 minutes to the south.

The two RV Parks in the City primarily serve long-term tenants now, so that is a source of affordable housing. But that use is inconsistent with the current zoning for Visitor Services, which is a priority use under the Coastal Act. DOF housing unit numbers do not appear to include RVs, though the ACS data may. The issue needs to be further researched and addressed in the City's LCP update.

(2) Constraints due to sewer, water, developable land suitability or preservation issues, emergency evacuation route capacities, or climate change risks

There are many. The primary constraint for development density in Trinidad is the lack of sewer system. With septic, density is limited to about one dwelling plus one J/ADU per 8,000 sq. ft. of lot area in the central part of town where the soils are very good, and even lower in other areas. Construction of a sewer is likely infeasible due to costs and environmental constraints, including the fact that most of Trinidad's shoreline is in an ASBS/SWQPA, where no new discharges are allowed. Most of the vacant land in Trinidad is Open Space, including the State Park, unstable coastal bluffs, and steep riparian corridors. The bluff top and shoreline areas are subject to sea level rise and bluff retreat hazards. The entire Trinidad area is also culturally significant to the Yurok people. The City is required to maintain trails and public access per the Coastal Act.

(3) The distribution of household growth that provide opportunities to maximize the use of public transportation and existing transportation infrastructure

Trinidad is in a somewhat isolated location with a generally shrinking population in recent decades. 2023 ACS indicates that only 5 people in Trinidad use public transportation to commute to work. (Note that the ACS margins of error for Trinidad are huge; it also estimates Trinidad's population to be 424 which is unrealistic.)

(4) The market demand for housing

Trinidad has some of the highest property values in the County due to its desirable location. Homes often sit on the market for longer than average. Trinidad has a low household size and high vacancy rate. Trinidad has a cap on the number of vacation/short-term rentals, but even before those were popular, Trinidad had a high vacancy rate, because many of the homes are second/summer homes.

(5) Agreements between a county and cities in a county to direct growth toward incorporated areas of the county, or ballot approved measures to preserve agricultural land

NA

(6) The loss of units contained in assisted housing developments

NA Trinidad has no assisted housing developments.

(7) High housing cost burdens (specifically those households spending over 30% of their income on housing)

According to the last housing element, Trinidad does have a fairly high percentage of households overpaying (43%). This is partially due to the lack of affordable housing, but people also choose to live in Trinidad, even though it is not necessarily near where they live and expensive, because of its scenic location and access to the coast/recreational amenities.

(8) The rate of overcrowding

Trinidad has a low household size (about 2) and low rate of overcrowding. The 2023 ACS indicates 0 units are overcrowded and 5 owner-occupied and 0 renter-occupied units are severely overcrowded of 207 occupied housing units, or 2.4%. However, the margin of error in such a small City is +/- more than 100%.

(9) The housing needs of farmworkers

There is no ag land in or around Trinidad.

(10) Housing needs generated by the presence of Cal Poly Humboldt.

Due to Trinidad's distance from CPH and high cost of housing, there aren't many students living in Trinidad.

(11) The housing needs for individuals and families experiencing homelessness

Due to the abundance of forestland around Trinidad, there are homeless encampments in the area. There are no homeless services in Trinidad, however, Due to Trinidad's isolation, small population, and high property values, there are not likely to be more services.

(12) The loss of housing units because of a state-declared emergency

NA

(13) Local/regional constraints or policies relating to regional greenhouse gas emissions reduction targets

Trinidad itself is walkable. But the limited services and non-service related employment opportunities mean that most people must commute to at least McKinleyville for work and shopping.

(14) Any other factors that you believe should be considered.

Trinidad has averaged significantly less than one new house per year over the last several decades. We will probably be 11 units short on the current RHNA. Our current housing element overestimated development potential, and several large, vacant parcels were donated to/acquired by the Trinidad Coastal Land Trust, and additional hazards/limitations have been identified on others. The City now only has vacant land to accommodate about 30 new units with a fair amount of certainty, and maybe another 8 more, depending on slope stability and creek/wetland setbacks. These numbers are based on septic and environmental limitations more than zoning. There is very limited potential for upzoning in Trinidad, particularly considering Coastal Commission requirements.

Additional Comments: