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Chapter 1 – Introduction

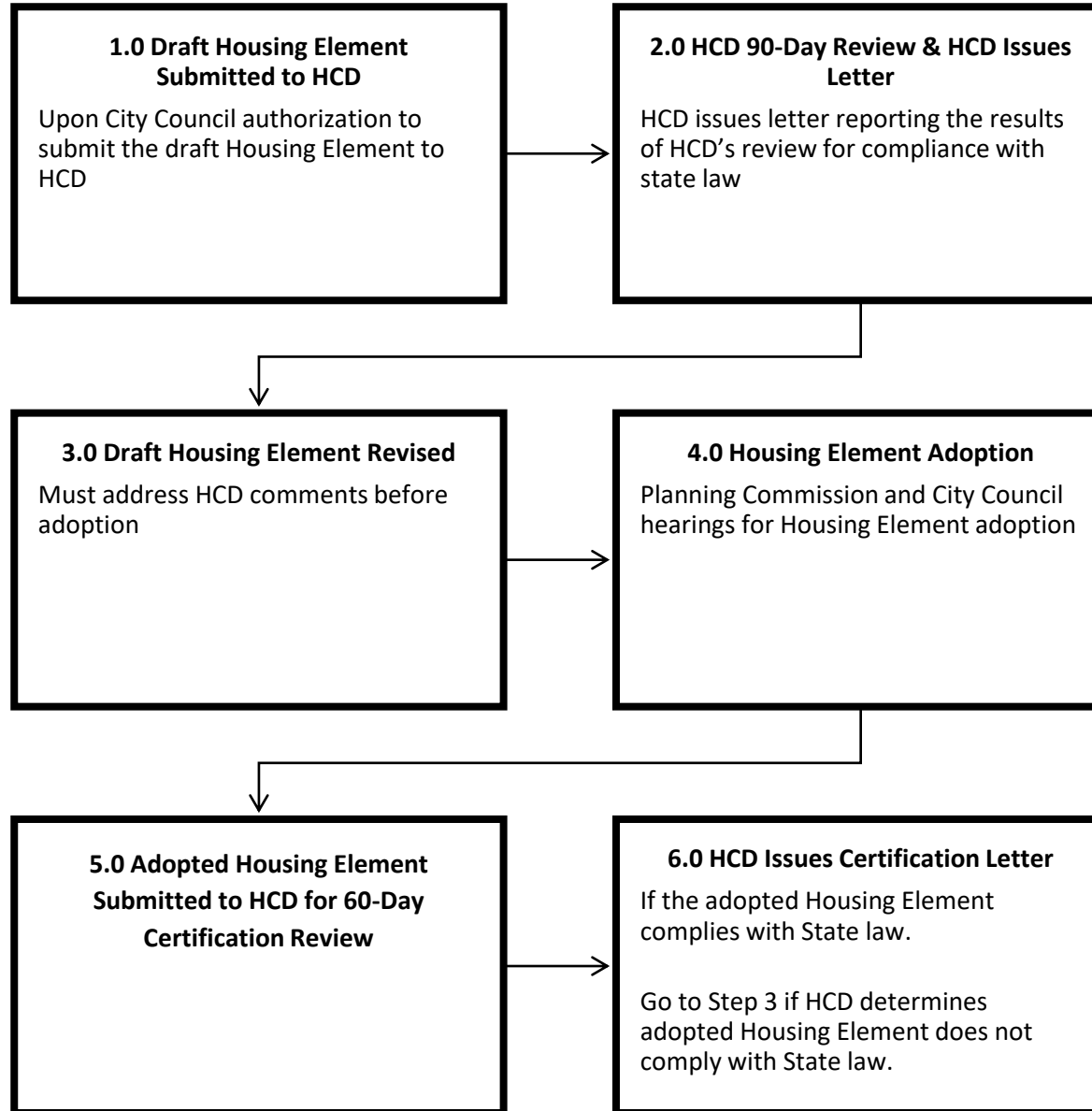
1.0 Overview

State Housing Element law recognizes that in order for the private sector to address housing needs and demand, local governments must adopt land-use plans and implement regulations that provides realistic opportunities for housing development and does not unduly constrain the production, preservation, or improvement of housing for households at all income levels.

As such, Housing Elements are subject to detailed statutory requirements. Unlike other general plan elements, Housing Elements are subject to review and approval (referred to as “certification”) by the State every eight years. The California Department of Housing and Community Development (HCD) reviews every local government’s Housing Element and determines whether it complies with State law. Because the Housing Element is part of the City’s General Plan, obtaining housing element approval from HCD is critical for maintaining the City’s General Plan compliance. Moreover, there are State funding programs for transportation, infrastructure, and housing that require (or consider) a local jurisdiction’s compliance with Housing Element Law. Figure 1 below illustrates the process of Housing Element preparation and adoption and HCD’s role in this process.

For this reason, the Housing Element is a mandatory element of the Blue Lake General Plan. State law requires that each city and county accommodate its fair share of affordable housing as an approach to distributing housing needs throughout the State. The Element establishes the City’s housing policies and implementation priorities for the 2027–2035 planning period and provides the framework through which the City will plan for its housing needs.

The Housing Element is a policy document that identifies Blue Lake’s existing and future housing needs and establishes proposed actions to facilitate the provision of housing to meet those needs for all income levels. The Housing Element’s policies and programs in Chapter 2 reflect a combination of the concerns of the local Blue Lake community along with new State housing mandates.

Figure 1: Housing Element Preparation and Adoption

2.0 Purpose

The purpose of the Housing Element is to establish specific goals and policies relative to the provision of housing for all income levels, and to adopt a series of programs to accomplish the City's housing goals and policies. In addition, the Element identifies and analyzes housing needs and resources and constraints to meeting those needs. State Housing Element Law requires cities and counties to adequately plan for their share of regional housing needs and to provide realistic opportunities for the development, preservation, and improvement of housing for people at all income levels.

This is Blue Lake's seventh Housing Element and it plans for the years 2027-2035. State law (Government Code §§ 65580 through 65589) mandates the contents of the Housing Element. By law, the Housing Element must contain all of the following:

- An analysis of housing needs of the city's population and to adequately plan to meet the existing and projected housing needs, including the jurisdiction's share of the regional housing needs allocation (RHNA).
- An inventory of land suitable for residential development, including vacant sites and sites having the potential for redevelopment.
- An analysis of housing constraints that impact housing production that identifies and analyzes potential and actual governmental constraints to the maintenance, improvement, or development of housing for all income levels, including housing for people with disabilities.
- Programs that implement the city's housing policies. Each jurisdiction must identify specific programs in its housing element that will allow it to implement the stated policies, and achieve the stated goals and objectives.
- An analysis of the jurisdiction's progress to implement the housing programs of the previous housing element, and the effectiveness of the programs.
- Actions that meaningfully promote and further fair housing opportunities in the community.

The Housing Element must also identify adequate residential sites available for a variety of housing types for all income levels; assist in developing adequate housing to meet the needs of very low-, low-, and moderate-income households; address governmental constraints to housing maintenance, improvement, and development; address the conservation of the existing affordable housing stock, and how the condition of the existing housing stock in need of improvement will be achieved; and promote housing opportunities for all persons.

Even though the focus of the Housing Element is on lower- and moderate-income households, the Element must address the housing needs and policy issues for the entire community and be consistent with the adopted policies of the rest of the General Plan.

Preparation and adoption of the Housing Element does not approve individual housing developments or require the City to construct housing. Rather, it establishes the land-use framework, policies, regulatory actions, and other local measures needed to provide meaningful opportunities for housing development and to reduce identified barriers to meeting the community's housing needs.

3.0 General Plan Consistency

State law requires that “the general plan, its elements and parts thereof comprise an integrated, internally consistent, and compatible statement of policies.” The Housing Element is an integral component of the Blue Lake General Plan and must be internally consistent with the goals, policies, and land-use framework established by the other General Plan elements. The City reviewed the existing General Plan as part of this update to identify any inconsistencies and to determine whether amendments to other elements are necessary.

The City will maintain internal consistency as the General Plan and Housing Element are implemented. Future amendments to the General Plan or Housing Element will be evaluated for consistency with all applicable elements, and the City will complete any related updates required by State law.

4.0 Regional Housing Needs Allocation

The Humboldt County Association of Governments (HCAOG) is a Joint Powers Authority (JPA) composed of Humboldt County and the cities of Arcata, Blue Lake, Eureka, Ferndale, Fortuna, Rio Dell, and Trinidad. In addition to its regional transportation responsibilities, HCAOG serves as the council of governments responsible for administering the Regional Housing Needs Allocation process for the Humboldt County region. Pursuant to State Government Code § 65584, the Department of Housing and Community Development (HCD) determines the existing and projected housing need for distinct regions in the state. HCAOG then develops and adopts a Regional Housing Needs Allocation Plan, in consultation with HCD and its member jurisdictions, that distributes the regional housing need among Humboldt County and each incorporated city.

The HCAOG Board adopted the seventh-cycle allocation methodology on December 18, 2025. Following HCD's review of the methodology and completion of the statutory appeals process, the HCAOG Board adopted the final 2026 Regional Housing Needs Allocation Plan on May 21, 2026, through Resolution 26-12. The allocation identifies the number of housing units for which each jurisdiction must plan, organized by income category. The seventh-cycle projection period begins December 31, 2027, and extends through August 31, 2035.

Blue Lake’s assigned allocation establishes the minimum housing capacity the City must accommodate through appropriately zoned sites, development standards, and implementation programs during the planning period.

Table 1: Regional Housing Needs Allocation Humboldt County, 2027-2035

Income category	Units
Acutely low income	3
Extremely low income	7
Very low income	4
Low income	8
Moderate income	4
Above moderate income	15
Total	41

Source: California Department of Housing and Community Development

5.0 Data Sources

Preparation of the Housing Element relied on a combination of federal, State, regional, and local data sources. Principal sources included the decennial United States Census, the American Community Survey (ACS), the California Department of Finance (DOF), data provided by the California Department of Housing and Community Development (HCD), and locally available information from the City, Humboldt County, regional agencies, housing and service providers, and community outreach activities. Using multiple sources allows the City to compare datasets, identify trends, and supplement statewide information with local knowledge of Blue Lake’s housing conditions.

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 indicators 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 is important to note 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.

HCD also provides standardized data and mapping resources to support preparation of Housing Elements. These resources include demographic, housing, economic, and land-use information, as well as materials developed for the assessment of fair housing.

6.0 Analysis of the Previous Housing Element

An important aspect of the Housing Element is an evaluation of achievements from the implementation of programs included in the previously adopted Housing Element. The evaluation provides valuable information on the extent to which programs have been successful in achieving stated objectives and addressing local needs, and the extent to which these programs continue to be relevant in addressing current and future housing needs in Blue Lake. The evaluation also provides the basis for recommended modifications to programs and the establishment of new objectives in the Housing Element. Chapter 2 – *Goals, Policies, and Programs* contains the City’s objectives and programs for the past planning period (2019-2027).

Blue Lake’s recent Housing Element history provides important context for this evaluation. Before the sixth cycle, the most recent Housing Element adopted by the City was the fourth-cycle Housing Element, adopted in 2009 for the 2007–2014 planning period. The City prepared a fifth-cycle update for the 2014–2019 planning period, but the update was not ultimately adopted by the City Council.

The City Council adopted the sixth-cycle Housing Element, covering the 2019–2027 planning period, on July 22, 2025, following a duly noticed public hearing. The City subsequently adopted Ordinance No. 546 on December 23, 2025, to implement Program HI-14 by completing required rezoning and establishing by-right procedures for qualifying multifamily development. On December 30, 2025, the California Department of Housing and Community Development determined that the adopted Housing Element, together with the completed rezoning, substantially complied with State Housing Element Law.

Because the 6th Cycle Housing Element was adopted relatively late in the 2019–2027 planning period, many of its programs had only a limited period for implementation before preparation of this seventh-cycle update began. The evaluation therefore considers both whether each program was initiated or completed and whether it established an effective foundation for continued implementation. Programs that remain relevant and have not yet had sufficient time to demonstrate measurable results may be continued or modified with updated objectives, schedules, responsible parties, and performance measures.

7.0 Looking Ahead

During the 2027–2035 planning period, Blue Lake will continue to address housing needs through locally appropriate actions and regional collaboration. Although housing conditions and development opportunities vary among Humboldt County jurisdictions, many challenges extend beyond individual city boundaries. Housing affordability, limited housing availability, infrastructure capacity, access to employment and services, and the need for specialized housing resources are regional issues that benefit from coordinated solutions. Also, there are many small jurisdictions in Humboldt County and bringing the resources to bear to prepare a legally sufficient housing element is overly burdensome, and for that

reason prior to the start of the 8th cycle, the City would appreciate the Department of Housing and Community Development being willing to support the preparation of a regional housing element for the Humboldt county region.

The City will pursue opportunities to coordinate with Humboldt County, neighboring cities, tribal governments, regional agencies, nonprofit housing organizations, and service providers when collaboration can improve program effectiveness or expand access to housing resources. At the same time, Blue Lake will continue to tailor its housing policies and programs to local conditions, community priorities, and available infrastructure.

Chapter 2 – Public Participation

1.0 Overview

Public participation is an important part of developing the City’s Housing Element. The information obtained through public meetings, surveys, and stakeholder interviews provide insight to the true needs of the community. Through the public participation process, the City can identify what issues and obstacles people may be experiencing when trying to find housing. As part of the Housing Element update process, the City implemented the State’s public participation requirements in Housing Element Law, set forth in Government Code Section 65583(c)(7), that jurisdictions “...shall make a diligent effort to achieve participation of all economic segments of the community in the development of the housing element.”

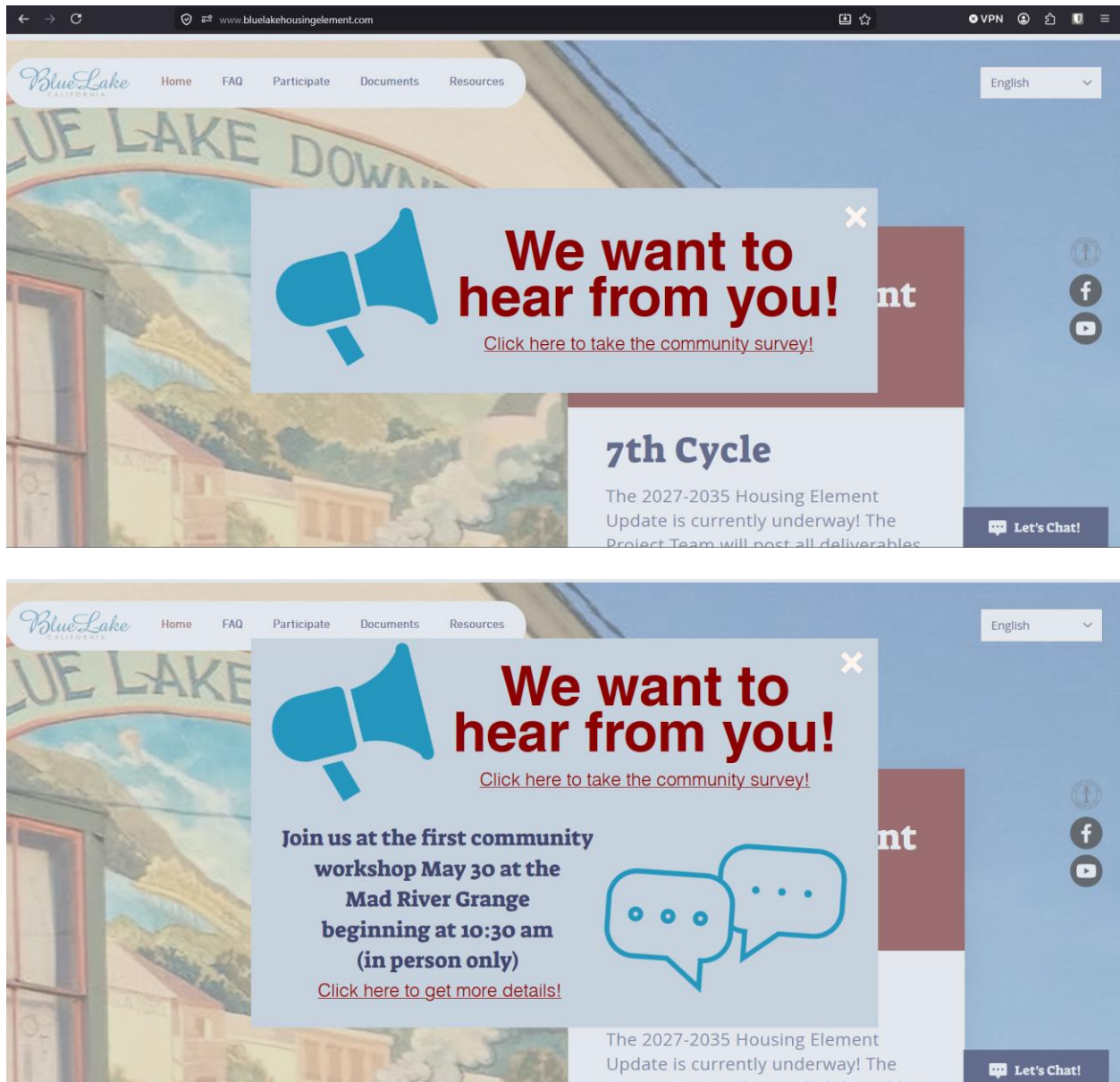
The Housing Element was developed through the combined efforts of City staff, the City Council and the City’s consultant. The inclusion of community stakeholders in the Housing Element public participation process helps ensure appropriate housing strategies are more efficiently and effectively evaluated, developed, and implemented. In an effort to involve all segments of the community, City staff and consultants developed a community outreach program including announcements on the City website, interviews, opportunity for housing element review and input at public workshops, a City Council study session, and public hearings. Public participation played a critical role in the formulation and refinement of the City’s housing goals, policies, and programs. Public comments received during public meetings and workshops, as part of the community surveys, and as written correspondence submitted to the City have been reviewed and are included in Appendix A. Received input that relates directly and is consistent with State housing element law and HCD requirements has been incorporated. The City’s outreach and engagement efforts are described below.

2.0 Website

The City created and maintained a dedicated website during the preparation and review of the Housing Element. This website provided easy access to information about the Housing Element, including general information about housing elements and details about workshops and other engagement opportunities. Project documents were posted to the website and comments were encouraged through the provided "Write us" and "Let’s chat" buttons on each page. A "Sign up for updates" button on the website allowed residents to sign up for the email list. Additionally, the website was hosted with Wix which allowed for the website to be translated into Spanish by clicking a drop down menu in the upper right hand corner of every page. Translations were reviewed and portions of the website were retranslated using the Google Translate tool into Spanish to ensure accurate correct technical term translation. The website had persistent and visible links to the City’s website, Facebook, and YouTube channel on every page.

This webpage provided easy access to project documents including Housing Element information. The website was also used to provide resources, FAQ, meeting presentations, survey link and results, and ability to submit comments and sign up for notices through the contact form. During the survey solicitation process the survey link appeared as a popup on the homepage. The popup feature was also used for notifying the public of the community workshop.

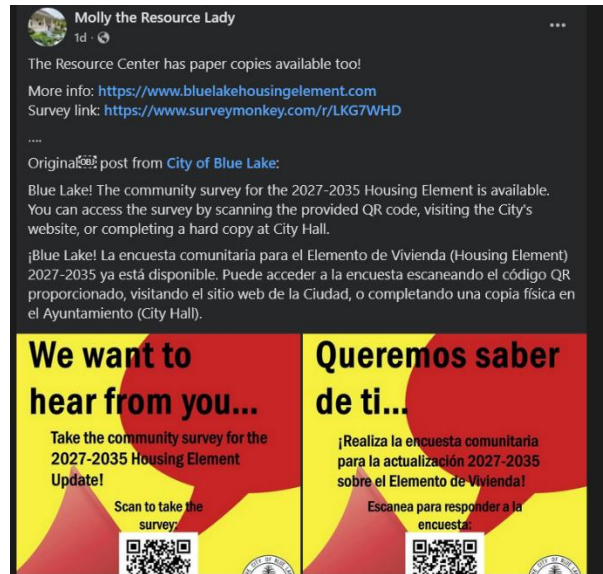
Figure 1 - Website Announcements



3.0 Social Media

Facebook. The City has a Facebook page to share City updates and public notices, including City Council agendas. The City also has a YouTube channel with recordings of City Council Meetings. The Facebook page is updated to periodically post links to the YouTube recordings. The Facebook page was utilized to announce the survey in Spanish and in English. The City's Facebook post was also reposted to other Blue Lake-related Facebook pages, such as "Molly the Resource Lady" (the personal page of the Blue Lake Family Resource Center manager) and an unaffiliated local page called "Blue Lake Community News, Events and Information (299)". Social media users who expressed concerns about housing issues in Blue Lake on this page were considered for one-on-one interviews.

Figure 2 – Community Survey Announcement Shared on Facebook



4.0 Community Survey

Community Survey: From April 7, 2026, until June 12, 2026, an anonymous community survey in English and Spanish was released to solicit input on housing needs and concerns. The survey was made available online using a platform, SurveyMonkey™ that is optimized for mobile devices. Paper copies of the survey were also available at City Hall and at the Blue Lake Family Resource Center. The City published regular reminders on their website, and Facebook page to encourage community participation. A sticker with the survey's URL and QR code was also attached to the May 1st water bill that is mailed to all City of Blue Lake customers (See Figure 3).

Figure 3 – Survey Information Attached to Water bill



A total of 50 surveys were completed. All economic segments of the community, including lower-income households, participated in the community survey, with approximately 19 respondents reporting their household incomes under \$60,000. The complete results are

contained in Appendix A. The survey questions were designed to better understand the housing experiences of residents. The responses to key questions are summarized below.

QUESTION 8: FROM THE FOLLOWING, CHOOSE THE ONE THAT BEST DESCRIBES YOUR CURRENT HOUSING SITUATION?

Results. Forty-eight respondents answered this question. The majority of respondents (32) own their home. A near equal number of renters and homeowners with mortgages took the survey (14 and 13, respectively). The responses to Question 8 are tabulated in Table 2-1. Three respondents described their living situations as follows:

- Homeowner
- Live with family
- Live in family home

Table 2-1 – Question 8 Responses Summarized

Tenure	Count
Homeowner without a mortgage	19
Renter	14
Homeowner with a mortgage	13
Other (please specify)	2
Live in someone else's house/rental unit paying rent but I'm not on the lease	1
Total	48

Response. Most respondents own their home (32), and of those, most (19) do not have a mortgage. This indicates many survey respondents are likely to be long-term residents of Blue Lake and is consistent with the results of Q9 (below).

QUESTION 9: HOW LONG HAVE YOU LIVED IN YOUR CURRENT HOME?

Results. Fifty respondents answered this question. Almost half of the respondents have lived in their home for more than 15 years. The responses to Question 9 are tabulated in Table 2-2.

Table 2-2 – Question 9 Responses Summarized

Years in Home:	
Average	18 years
Median	14.5 years
Min.	1 year
Max.	45 years
How long have you lived in your current home?	Count
In home 5 years or less	8

Years in Home:	
In home 6 to 15 years	18
In home greater than 15 years	24

Response. Consistent with Q8, the results indicate that many respondents are long-term residents of Blue Lake. Together, the results of Q8 and Q9 may suggest that residents have a wide range of housing cost experiences.

QUESTION 10: DOES YOUR CURRENT HOUSING SITUATION MEET YOUR NEEDS?

Results. Fifty respondents answered this question, and about 70% said their current housing situation meets their needs. The responses to Question 10 are tabulated in Table 2-3.

Table 2-3 – Responses Summarized

Does your current housing situation meet your needs?	Count
Yes, completely. I have no complaints.	35
Yes, somewhat. But I have complaints.	13
Not at all. I have complaints.	2
Total	50

Response. A majority of respondents (35) are satisfied with their current housing situation; however, 15 respondents (43%) are not. For those who are not satisfied with their current housing situation, Q11 that follows gives respondents an to share their experience.

QUESTION 11: IF YOUR CURRENT HOUSING SITUATION DOESN'T MEET YOUR NEEDS, WHAT ARE THE REASONS? (check all that apply)

Results. Question 11 gave respondents who answered Q10 either “Yes, somewhat. But I have complaints” or “Not at all. I have complaints” an opportunity to share the nature of their housing issues by selecting from a range of prompts and/or writing a long-form response. The responses to Question 11 are tabulated in Table 2-4. Twenty-six respondents answered this follow-up question to Question 10, of which 23 answered “none of the above”. Twelve respondents selected “Other, please specify” and provided long-form written responses, which are summarized in Table 2-5. Fourteen respondents chose responses from the list.

Among respondents who are somewhat or not at all satisfied with their current housing situation high housing costs are a common theme. This theme shows up directly in the selection of “the cost of heating or electricity for my home”, and some of the long-form responses in Table 2-5. The high housing cost theme is inferred from those who desire to own a home rather than rent; the respondent whose home is in need of major repairs; a respondent

who is having difficulty accessing high-speed internet or cell signal; and in some of the long-form responses in Table 2-5.

Table 2-4 – Question 11 Responses Summarized

Housing Issue (selected from the list prompts)	Count
None of the above	23
Other (please specify)	12
I am currently renting, but would like to own a home	3
I can't afford the cost of heating or electricity for my home	3
My home is too big	2
I have no privacy	2
My home is too small	1
My home needs major repairs	1
I feel unsafe	1
I have difficulty accessing high-speed internet or cell signal	1
My home is not affordable	0
My home is overcrowded	0
I don't have reliable access to heating or electricity	0
My home is unsuitable or inaccessible for my physical needs	0
I only have temporary housing (6 months or less)	0
Total	26

Table 2-5 – Question 11 Analysis of “Other, please specify” Long-Form Responses

Theme	Core Sentiment	One-Sentence Summary	Respondent Count	Verbatim Quote 1	Verbatim Quote 2
Space & Privacy Constraints	Frustrated / Cramped	Several respondents cite inadequate space—whether too small overall, lacking yard space, no storage, or living too close to neighbors in multi-unit housing.	4	"Too small. Not affordable. Heat unaffordable. Renting/would rather own. No privacy."	"Close neighbors (4 plex), no yard"
Affordability & Cost Burdens	Strained / Concerned	Housing costs—including rent, heating expenses, and the gap between renting and owning—create financial strain for some residents.	2	"Too small. Not affordable. Heat unaffordable. Renting/would rather own."	"Could use more storage and yard space" (implied cost barrier to upgrading)
Social Isolation & Housing Condition	Lonely / Concerned	Some residents face emotional challenges (isolation) or physical housing issues (major repairs needed) that affect quality of life.	2	"It's lonely."	"This does not allow multiple answers - too small, needs major repairs"
Independence & Life Stage Transition	Eager / Ready	Younger residents living with family express readiness to transition to independent housing but face barriers to doing so.	1	"I would love to live away from parents, ready to have my own apartment"	(Single response in this theme)

Response. The City included a variety of programs responding to these issues, including programs to encourage affordable rental housing, the maintenance and rehabilitation of the existing housing stock, programs that provide assistance to homebuyers, encourage special needs housing, and provide information on fair housing rights and responsibilities.

QUESTION 14: WHAT ARE THE GREATEST CHALLENGES YOU HAVE FACED WHEN LOOKING FOR QUALITY AND AFFORDABLE HOUSING IN BLUE LAKE? (check all that apply)

QUESTION 15: WHAT CHALLENGES MIGHT OTHERS FACE TRYING TO FIND A HOME IF THEY WANT TO MOVE INTO BLUE LAKE OR CHANGE HOUSING SITUATIONS WITHIN BLUE LAKE?

Results. Q14 and Q15 asked a similar question from different perspectives. Q14 was a multiple-choice question, and Q15 was an open-ended question asking respondents to share their perspectives. Table 2-6 and Table 2-7 summarize the responses to Q14. Table 2-8 summarizes the responses to Q15.

Fifty respondents completed Q14. This was a multi-choice question, and Table 2-6 summarizes the results. Twenty-three respondents selected “Other, please specify” and provided long-form written responses, which are analyzed and summarized in Table 2-7. The 48 responses to Q15 are analyzed and summarized in Table 2-8.

While many Q14 respondents did not personally face housing challenges, some respondents recognized that others in the community, especially those seeking affordable housing, do struggle. The responses to these two questions share common themes: housing costs for both rental and purchase are high, and overall supply is low. Workforce housing and housing for young families is not affordable. Some respondents note that a personal connection is essential to finding housing in Blue Lake, suggesting little to low housing mobility. Some Q15 respondents also mention condition issues with the housing stock and with landlords.

Table 2-6 – Question 14 Responses Summarized

Housing Challenges (selected from the list of prompts)	Counts
Other (please specify)	23
Cost of rent	17
Few options for rental units	17
Few options for units for-sale	16
I cannot find a home within my price range	13
Cost of mortgage payment	10
I do not have the funds for a down payment	7
Cost of fire insurance/inability to secure insurance	5
I don't have funds for up-front rental deposits	4
My income does not qualify me for a mortgage or rental	3
Lack units suitable for my physical needs/lack of ADA accessible units	2
Discrimination by landlords	1
Cost of fire insurance	0

Table 2-7 – Question 14 Analysis of “Other, please specify” Long-Form Responses

Theme	Core Sentiment	One-Sentence Summary	Respondent Count	Verbatim Quote 1	Verbatim Quote 2
No Personal Challenges	Satisfied / Reflective	The majority of respondents report no housing challenges, typically because they are long-term homeowners who purchased years ago when conditions were different.	14	"no significant challenge in 1981"	"N/A, lived here too long and have high income"
Recognition of Others' Struggles	Empathetic / Concerned	Some homeowners note that while they personally don't face challenges, they recognize that others, especially those seeking affordable housing, do struggle.	3	"I own my house but others need to find affordable housing in Blue Lake."	"this is according to friends--not myself"
Market Conditions & Housing Stock	Frustrated / Observant	Those who cited specific challenges mention overpriced sales (above appraised value) and aging housing stock as barriers.	1	"Houses selling above appraised value; housing stock is old."	(Single response in this theme)
Pet Ownership Barriers	Disappointed / Practical	Pet owners face additional challenges finding housing, as many landlords restrict or prohibit dogs.	1	"It's hard for people with dogs"	(Single response in this theme)
Property Tax Burden	Concerned / Financial	Property taxes were cited as a housing-related financial challenge for at least one homeowner.	1	"Taxes"	(Single response in this theme)

Q15 was a qualitative question asking respondents to describe the types of challenges others may face trying to find a home in Blue Lake or to change their housing situation within Blue Lake. ?” Table 2-8 summarizes and analyzes the responses provided.

Table 2-8 – Question 15 Analysis of the Responses

Theme	Core Sentiment	One-Sentence Summary	Respondent Count	Verbatim Quote 1	Verbatim Quote 2
High Cost & Affordability Crisis	Frustrated / Alarmed	Housing prices, both rental and purchase, have soared beyond what most residents can afford, with prices rising far faster than wages and creating financial strain for renters and would-be buyers alike.	33	"Prices are way too high; rental units are generally old and outdated but rent at high prices due to the lack of units on the market. There are several predatory landlords that own a number of the rental units; they collude on pricing to keep rents high and unit improvements minimal."	"Inflation has far surpassed my initial rent. I live on my pension and social security. Now thanks to Trump, if my landlord raises the rent by even \$200 I will become homeless."
Extremely Limited Housing Supply	Resigned / Concerned	There is simply very little housing available in Blue Lake, few units on the market, limited rental options, and no room to build except ADUs, making it nearly impossible to find anything.	20	"There's just nothing available."	"Very few places available"
Landlord Practices & Rental Conditions	Angry / Vulnerable	Renters face predatory landlords who raise rents without making repairs, impose unrealistic income requirements, and prioritize profit over tenant wellbeing.	6	"greedy landlords that just want your money and care little of repairs or upkeep but have no remorse continuously upping the rent."	"Three times rent as income qualifier for rentals is too much"
Hidden Costs & Infrastructure Gaps	Practical / Overwhelmed	Beyond housing costs, residents face high utility bills, the need for a car, and the lack of services,	3	"Taxes"	"Lack of inventory; cost of water, sewer, garbage; cost of

Theme	Core Sentiment	One-Sentence Summary	Respondent Count	Verbatim Quote 1	Verbatim Quote 2
		which add significant expenses that make Blue Lake less affordable than it appears.			transportation to get to job, grocery, medical."
Exclusivity & Structural Barriers	Critical / Observant	Finding housing often requires insider connections, while outside cash buyers (from the Bay Area) and an aging homeowner population create barriers that exclude young families and newcomers.	3	"impossible to find an in, you have to know someone"	"High income cash buyers (from Bay Area) taking available. No rentals, a population that does not want young people."

Response. The City included a variety of programs responding to these issues, including programs to encourage affordable rental housing, programs that provide assistance to homebuyers, encourage special needs housing, and provide information on fair housing rights and responsibilities.

QUESTION 16: WHAT DO YOU THINK ARE THE MOST NEEDED TYPES OF HOUSING IN BLUE LAKE? YOU CAN CHOOSE AS MANY AS YOU THINK ARE NEEDED? (you can choose as many as you think are needed)

Results. Forty-eight of 50 survey respondents (or 96%) completed Q16, a multiple-choice question, and the results are summarized in Table 2-9. While the survey provided an “Other (please specify)” option, no respondents provided a long-form answer. The top responses to Q16 are consistent with the answers to Q14 and Q15. From the range of prompts given in Q16, respondents most agreed that the most needed housing types were “affordable rental options” (33), “more housing to buy” (28), and workforce housing” (22). These top three are followed by “ADUs” (19), “senior housing” (18), and “housing of any type, we just need more homes” (18).

Table 2-9 – Question 16 Responses Summarized

Housing Types (selected from the list prompts)	Counts
Affordable rental options	33
More housing to buy	28
Workforce housing. Workforce housing is intended for households that earn too much to qualify for traditional subsidized affordable housing, but market prices and rents are unaffordable. [The question provides the annual gross household income ranges for workforce housing.]	22
Accessory dwelling units (sometimes called ADUs, granny flats, second units)	19
Senior housing	18
Housing of any type, we just need more homes!	18
Mixed-use developments that combine commercial and residential homes	16
Housing that is accessible for people with physical disabilities	14
Supportive housing for persons with special needs, this could include persons with developmental disabilities	11
Housing for large families	11
Stationary tiny homes	11
Manufactured homes	9
RVs, trailers, and tiny homes on wheels	7
Temporary or short-term housing for people who do not have a home or need to suddenly leave their home or household situation	2

Response. As mentioned above, the City included a variety of programs responding to these issues, including programs to encourage affordable rental housing, programs that provide assistance to homebuyers, encourage special needs housing, and provide information on fair housing rights and responsibilities, and programs to facilitate ADU and JADU, and improving the visibility of ADUs as a housing options.

QUESTION 21: WHAT ARE TWO THINGS YOU LOVE ABOUT LIVING IN BLUE LAKE?

QUESTION 22: WHAT ARE TWO THINGS THAT BLUE LAKE DOES NOT CURRENTLY PROVIDE?**QUESTION 23: IF YOU HAD A MAGIC WAND, WHAT IS ONE THING YOU WANT TO CHANGE ABOUT HOUSING IN BLUE LAKE IN THE NEXT TEN YEARS?**

Results. This series of questions sought input from respondents on Blue Lake’s community assets, potential gaps and unmet needs, and future priorities, while also providing an opportunity for non-housing-specific input. The results of Q21 are summarized in Figure 4 and Table 2-10; Q22 responses are summarized in Figure 5 and Table 2-11; and Table 2-11 provides an summary and analysis of responses to Q23.

As shown in Figure 4, Blue Lake’s weather and climate, the community, and its people, were the most common themes in responses to Q21. The most common community needs cited in the responses to Q22 were for a local grocery store, and restaurant/dining options as illustrated in Figure 5.

Figure 4 – Question 21 part 1 Summary of Responses

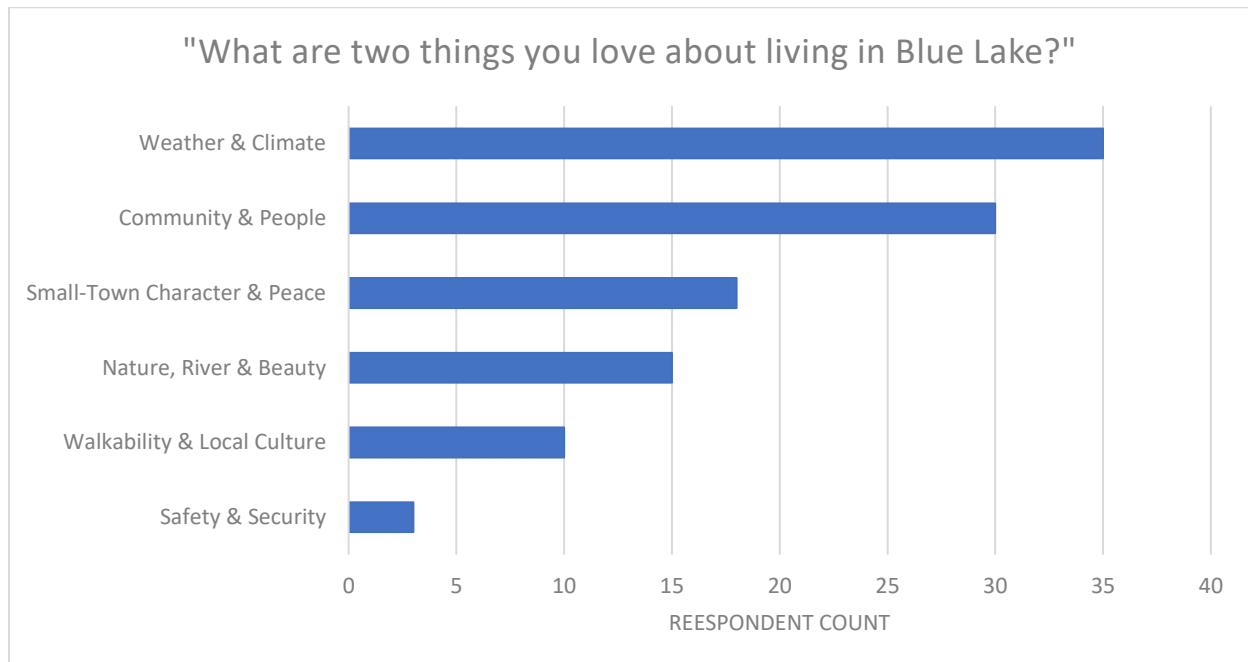


Figure 5 – Question 21 part 2 Summary of Responses

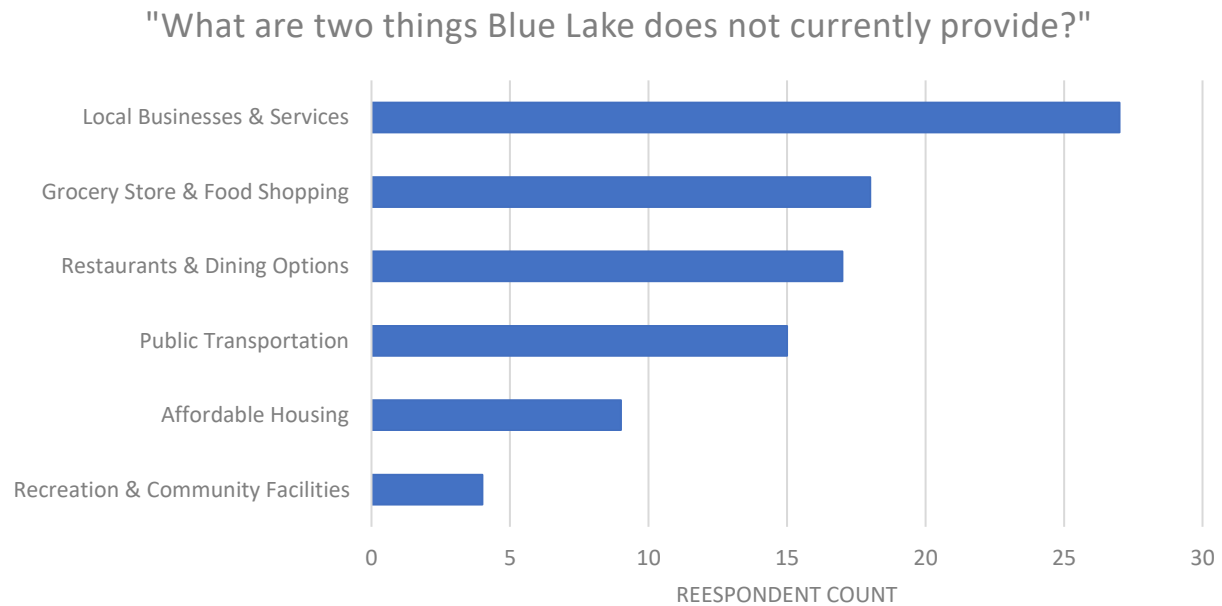


Figure 6 – Question 22 Summary of Responses

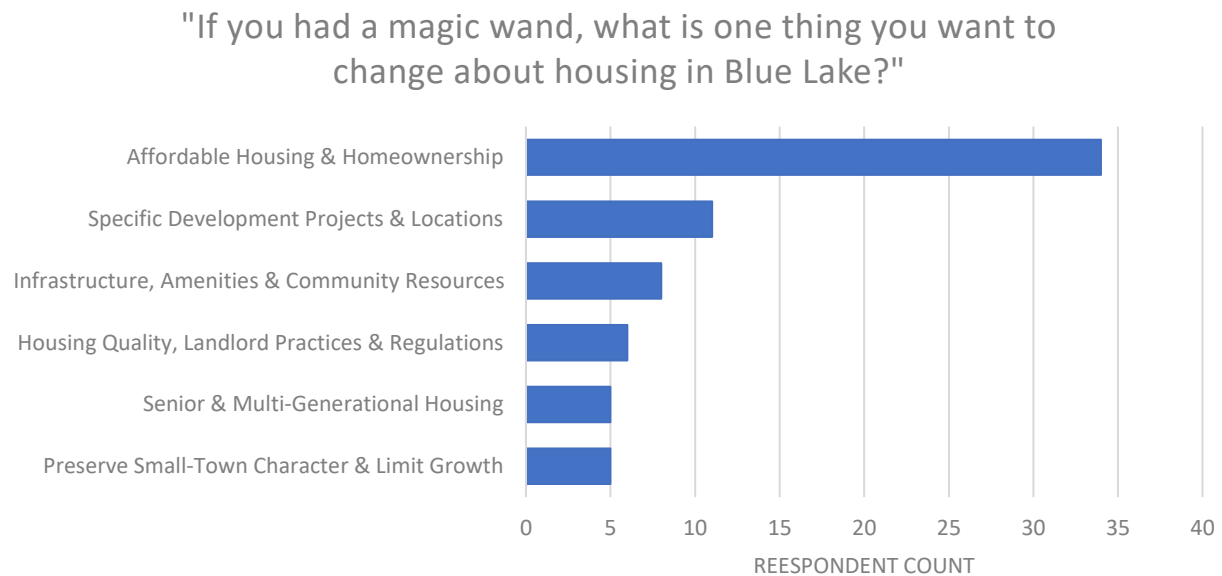


Table 2-10 – Question 21 part 1 Analysis of the Responses to "What are two things you love about living in Blue Lake?"

Theme	Core Sentiment	One-Sentence Summary	Respondent Count	Verbatim Quote 1	Verbatim Quote 2
Weather & Climate	Delighted / Grateful	Blue Lake's sunny, warm climate is the most frequently cited reason residents love living there—the sun literally "adds to happiness" and distinguishes it from foggy coastal areas.	35	"Quiet at night!! The sun really makes a difference - it adds to my happiness!"	"THE LAND & THE SUN"
Community & People	Warm / Connected	Residents deeply value their friendly, close-knit community—knowing neighbors, volunteering together, and feeling a strong sense of belonging and mutual support.	30	"I love the small community (knowing my neighbors and going to community events). I love the public parks and land that I have within walking distance of my house."	"Volunteers at local organizations and everyone who shows kindness to others."
Small-Town Character & Peace	Appreciative / Protective	The quiet, peaceful, small-town atmosphere—away from mainstream hustle, low traffic, and feeling "out of the main stream"—is cherished as a core part of Blue Lake's identity.	18	"The Beauty that surrounds us every morning you wake up, peaceful, quite, out of the main stream."	"The scale of the town (not sprawling, walkable, residential oriented) and the open space surrounding the town (forest, agricultural land,

Theme	Core Sentiment	One-Sentence Summary	Respondent Count	Verbatim Quote 1	Verbatim Quote 2
					riverine habitat)."
Nature, River & Beauty	Joyful / Grounded	Access to the river, forests, natural beauty, gardens, and the surrounding landscape provides residents with daily connection to the outdoors and a beautiful living environment.	15	"Small town sense of community. River, forests, easy access to the natural world."	"Walking to the river and the people"
Walkability & Local Culture	Engaged / Proud	Residents love being able to walk to trails, parks, the river, local venues like Dell'Arte theater, the Logger Bar, and community events—creating a vibrant, accessible lifestyle.	10	"I love being able to walk my dogs to the river and then walk to the Logger or tap room with them. I love having live theater walking distance to my house @ Dell'Arte"	"Community events, weather, inclusive neighbors. River access, cultural events: da, logger, brewery"
Safety & Security	Reassured / Grateful	Residents appreciate feeling safe in Blue Lake—low crime, the ability to leave doors unlocked, and a secure environment for children.	3	"Community and safety are incredible. Also very clean!!!"	"I loved the small town safety for my kids."

Analysis of 50 responses from Blue Lake Housing Element Survey

Note: Respondents were asked for two things they love. Most responses mentioned multiple themes. Weather + Community was the most common pairing (appeared in 20+ responses together).

Table 2-11 – Question 21 part 2 Analysis of the Responses to "What are two things Blue Lake does not currently provide?"

Theme	Core Sentiment	One-Sentence Summary	Respondent Count	Verbatim Quote 1	Verbatim Quote 2
Local Businesses & Services	Longing / Pragmatic	Residents miss having local shops, banking, employment opportunities, and services—noting that the small population and lack of drive-by traffic make it hard for businesses to survive.	27	"Does not provide work, any small businesses, or a small grocery shop. I wish there was a small grocery stop that wasn't the gas station."	"fully connected bike path to arcata and more small, local brick and mortar shops (e.g. outdoor store, farm stand, etc.)"
Grocery Store / Food Shopping	Frustrated / Urgent	The lack of a local grocery store is the most frequently cited gap—residents must drive out of town for basic food shopping, creating hardship especially for those without cars or on limited budgets.	18	"Just two...Blue Lake is lacking so many things that it used to have...We don't have access to groceries and have extremely limited food options. There is no retail or	"The ability to not have a car, there's no grocery store for example"

Theme	Core Sentiment	One-Sentence Summary	Respondent Count	Verbatim Quote 1	Verbatim Quote 2
				small shops to support."	
Restaurants & Dining Options	Disappointed / Hopeful	Residents strongly desire local dining options—cafes, family-friendly restaurants, and healthy food choices—beyond the casino, recalling beloved spots like the old burger bar or Stardoughs.	17	"A decent restaurant not the casino and small grocery store. there is so little space for housing."	"A Cafe or something like the old burger bar or stardoughs"
Public Transportation	Concerned / Practical	Limited and infrequent bus service creates barriers for residents who cannot drive, including seniors, youth needing to reach high school, and workers commuting out of town.	15	"adequate transportation options for people who work out of town or kids needing to get to high school"	"Enough public transportation (I know there are too few riders -- but there aren't enough bus options for people to ride regularly)"
Affordable Housing	Urgent / Advocacy	Several residents explicitly call out the lack of affordable and workforce housing as a	9	"Affordable housing!!! An atm or bank	"Workforce housing, effective City governance"

Theme	Core Sentiment	One-Sentence Summary	Respondent Count	Verbatim Quote 1	Verbatim Quote 2
		critical gap that limits who can live in Blue Lake.		branch would be nice."	
Recreation & Community Facilities	Hopeful / Community-Minded	Some residents desire community gathering spaces, recreational facilities like a pool or gym, and places for activities and socializing.	4	"A community pool or recreation center"	"More gathering spaces for events"

Analysis of 49 valid responses (1 "no opinion" excluded) from Blue Lake Housing Element Survey

Note: Most responses mentioned two items as requested. Counts reflect all mentions of each theme. Groceries and restaurants often appeared together in the same response.

Table 2-12 – Question 22 Analysis of the Responses to "If you had a magic wand, what is one thing you want to change about housing in Blue Lake?"

Theme	Core Sentiment	One-Sentence Summary	Response Count	Verbatim Quote 1	Verbatim Quote 2
Affordable Housing & Homeownership	Urgent / Hopeful	Residents want more affordable housing options—particularly for young families, workforce, and low-income residents—with many expressing personal desires to own rather than rent.	34	"Make it more affordable and more of it. More people should get the chance to live here."	"i want to own a home"

Theme	Core Sentiment	One-Sentence Summary	Response Count	Verbatim Quote 1	Verbatim Quote 2
Preserve Small-Town Character & Limit Growth	Protective / Cautious	Many residents want to preserve Blue Lake's small-town feel, opposing large apartment complexes and preferring appropriately-scaled development that maintains community character.	5	"Some more housing is good but the charm of Blue Lake is being a small town, so no large projects."	"I don't want it to become overpopulated it's a small town"
Housing Quality, Landlord Practices & Regulations	Frustrated / Demanding	Residents are frustrated with predatory landlords, poor housing conditions, and lack of tenant protections—calling for code enforcement and rent control.	6	"greedy slumlords, making it if they don't repair and make living livable then they are not allowed to charge outrageous fees"	"I would love to own a home in Blue Lake and have a rent control policy be implemented."
Senior & Multi-Generational Housing	Forward-Looking / Inclusive	Some residents specifically call for senior housing options or multi-generational	5	"Affordable housing for seniors"	"More rental units without retail space, mixed housing, seniors, ADUs, families"

Theme	Core Sentiment	One-Sentence Summary	Response Count	Verbatim Quote 1	Verbatim Quote 2
		communities that allow aging in place while welcoming young families.			

Analysis of 48 substantive responses (2 blank excluded) from the Blue Lake Housing Element Survey

Question 23 asked respondents to choose between the following two options, all 50 respondents said they wanted to continue living in Blue Lake.

- ☐ I want to stay living in Blue Lake.
- ☐ I want to move to another city or community in Humboldt County.

Question 24 consisted of three prompts that asked respondents to complete three statements about the kind of place they want Blue Lake to be. The responses extend beyond housing production and identify desired outcomes for everyday life, family well-being, and community cohesion. Example comments include:

- *“Afford to live, have friends, and get what I need when I’m no longer able to drive”*
- *“Live for generations (in multiple kinds of housing)”*
- *“All work towards similar goals and take care of our vulnerable friends”*
- *“Thrive and be independent from having to leave the area for basic amenities”*
- *“Walk freely enjoy neighbors watch children play listen to music and enjoy theater and art events. Grange very important”*

Table 2-13 – Question 24 Responses Summarized

Q24 Prompts	Response Themes
I want to live in a place where I can...	Walkability/bikeability/trails/non-car access (18), safety/security (12), community connection/belonging (10), peace/quiet/nature access (9), and access to services/amenities (8)
Where my family can...	Thriving/well-being (22), safety/security (12), affordable housing/walkability (10), community connection/belonging (7), outdoor recreation/nature (6)
Where my community can...	Gathering/events/connection/fun (15), thriving/prosperity/growth (24), mutual unity/civility/participation (12), support/care/service (7), safety/peace/inclusivity (7)

5.0 Community Workshops

May 30, 2026 In-Person Public Workshop. This workshop was noticed on the City’s website, included in the Participation section and as a pop-up on the Housing Element Update website. Flyers were distributed online with print copies sent to water/sewer customers with their next bill and posted at City Hall.

On May 30, 2026, the City of Blue Lake held a Housing Element Workshop at the Mad River Grange in Blue Lake to provide information to the public regarding the Housing Element process. The workshop attracted 15 community attendees and provided four stations with interactive posters to better understand community opinions regarding housing, development, and Blue Lake’s future.

The first station, “Understanding community experiences and aspirations,” was fully interactive and invited participants to share why they chose to live in Blue Lake, what they value, what they feel is missing, what changes they would like to see, and their experiences finding housing. Four posters were displayed, allowing participants to write and post their responses directly on each poster.

The second station, “Demystifying the Housing Element,” provided information about how the Housing Element works and the limited local discretion available in the process. Posters about RHNA, Housing Element goals, and income levels were provided.

The third station, “Planning for housing that works for Blue Lake,” provided posters explaining the density required to meet Housing Element needs, displayed visuals of different housing types, and offered an interactive poster to receive feedback on what types of housing community members would like to see developed in Blue Lake.

The final station featured an interactive map of Blue Lake where residents identified the types of housing they would like to see and where they thought it should be located. Participants used three dot colors to represent different housing sizes: 1–4 units, 5–14 units,

Figure 7 – Workshop Flier, English



Figure 8 – Workshop Flier, Spanish

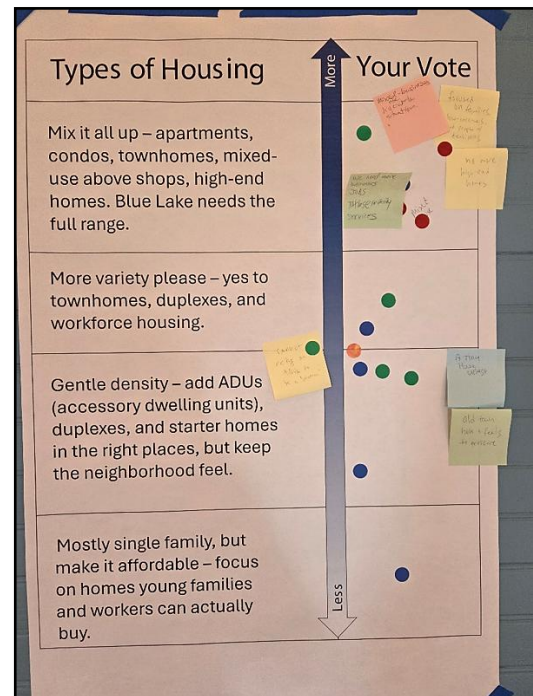


and 14 or more units. Most participants favored smaller developments of 1–4 units, including ADUs, in areas that already contain single-family homes. Some participants expressed interest in medium-sized developments of 5–14 units and larger developments of 14 or more units outside existing residential areas, toward the outskirts of Blue Lake.

Participants identified several major themes in this workshop. They emphasized the importance of Blue Lake's strong sense of community, small-town rural character, access to nature, walkability, and safety. Participants also noted that housing in Blue Lake is increasingly difficult to find because of high costs and limited supply. They expressed support for more affordable and diverse housing options, including apartments, live-work spaces, senior and ADA-accessible housing, mixed-use development, ADUs, and small-scale development that preserves Blue Lake's historic character and small-town feel.

August 1, 2026 In-Person Public Workshop-City Council Study Session

Figure 9 – May 30, 2026 Workshop, Housing Types Voting Poster



6.0 Noticing

The City does not have a newspaper of general circulation. Therefore, the City posts paper notices on three public bulletin boards mounted to the exterior of the respective buildings at City Hall, the post office, and the Mad River Grange. These postings have been supplemented by notices posted on the City's Facebook page, City website, and Housing Element Update website.

7.0 Public Hearings

[[summaries of future public hearings will be inserted here]]

Chapter 3 – Evaluation of the Previous Housing Element

As part of preparing a housing element update, cities and counties are required to evaluate the overall effectiveness of their housing element, including the element's goals, policies, and programs. Specifically, the appropriateness of the element's goals, objectives, policies, and programs must be evaluated.¹ The required analysis includes evaluating progress in implementing each program and describing how the programs are being changed to reflect lessons learned from the previous housing element's results.

1.0 Overall Effectiveness of 6th Cycle Housing Element

The overall limited availability of funding has constrained the completion of many 6th Cycle Housing Element programs. While the City has limited staff capacity, increasing funding available to support program implementation would enable the City to retain qualified professionals to help complete its programs.

As indicated in Table 3-1, programs that remain relevant are carried forward and, if necessary, modified and expanded to ensure compliance with State law. Some lessons learned include:

- Where State law limits the City's land use authority, e.g., ADU development and Density Bonuses, the City finds it is a more effective use of resources to directly reference State law.
- There is community interest in ADU development, and improving information and marketing of ADUs could increase ADU starts and/or conversions.

A total of 10 housing units were added during the six-year period from 2019 to 2025: 9 above moderate income units, and 1 moderate income unit. The City met its 6th Cycle allocation of 7 above moderate units, and made progress on its moderate income allocation of 5 units. However, during that same period, no units affordable to lower income households were permitted.

2.0 Summary of the Effectiveness of Programs in Meeting Special Housing Needs

In June 2022 of the 6th Cycle planning period, the City entered into a disposition and development agreement with Danco Communities for the development of a mixed use development with approximately 40 multifamily rental housing units, of which 39 of units for families and/or seniors earning no more than sixty percent (60%) of the Area Median Income,

¹ Appropriateness being a description of what has been learned based on the analysis of progress and effectiveness of the previous housing element.

with approximately 20,000 square feet of ground floor light manufacturing and/or retail space. The project was proposed on an approximately 3-acre portion of City-owned land known as APNs 312-161-018 and 312-161-015. This project is still pending as of the preparation of this report.

During the six-year period of 2019 – 2025, 10 housing units were permitted; 5 of the permitted units were accessory dwelling units (ADUs). Four of the 10 permitted units replaced existing single family residences. The City has met its 6th Cycle above moderate RHNA by permitting 14 units estimated to be affordable to this income category. Blue Lake has also made progress on its moderate income RHNA by permitting two units estimated to be affordable to moderate income households. However, during the six-year period of 2019 – 2025, no lower-income units have been permitted. The five ADUs added were estimated to be market rate units.

As of the writing of this report, the City has not completed zoning code updates meant to ensure compliance with State law related to SROs, transitional and supportive housing, and low barrier navigation centers due to funding constraints. These programs will be carried forward into the 7th Cycle, and time frame for completion will be shortened, as indicated in Table 3-1.

3.0 Review of Previous Housing Element Goals and Policies

Blue Lake’s 6th Cycle Housing was due before the mandates for affirmatively furthering fair housing (AFFH) took effect. Consequently, it is necessary to amend the 6th Cycle’s goals and policies through the 7th Cycle Update to reflect this change. Another change is to better express the City’s commitment to encouraging a variety of housing types and ownerships for all community members.

4.0 Review of Previous Housing Element Programs

Table 3-1 provides the implementation progress of the City’s housing programs from the City’s adopted and certified 6th Cycle Housing Element.

Table 3-1

Name of Program	Program Objective and Time Frame	Status of Implementation	Appropriateness and Update for 7th Cycle
HI-1: Accessory Dwelling Units	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. <u>Time Frame:</u> 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.	In progress. The City understands that State law specifies that any local ordinance that does not meet current statutory requirements is considered null and void, and that jurisdictions must apply the State standards directly for the development of ADUs and JADUs, i.e., statutory mandated units per GC § 66323, and at least one unit described in § 66314, and may only impose objective development and design standards on § 66314 units.	The program should be modified . Given the frequency and breadth of updates to Accessory Dwelling Unit law, including HCD's ADU Guidebook, the City is modifying the Program HI-1 for ADUs to 1) repeal section 17.24.270 in its entirety; and 2) add language to any other zoning provisions that regulate ADUs/JADUs (e.g., section 17.24.100.A, Off-Street Parking Requirements) to clearly state that State ADU/JADU law governs the ADU/JADU development. The proposed amendments will remove uncertainty regarding the State law mandate that junior accessory dwelling units (JADUs) that meet the requirements of Government Code § 66314 are allowed by-right. The net result will be that the City will continue to apply State ADU and JADU standards directly. The amendments will be adopted within 3 years of the Housing Element adoption.
HI-1: 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 (GC § 65852.3). This includes, but is not limited to, allowing manufactured homes on a permanent foundation as a single-family use. <u>Time Frame:</u> Amend the Zoning Code by December 2024.	In Progress. The City understands that State law requires the City to allow the installation of manufactured housing mobile homes in the same manner as conventional dwellings, and applies the same development standards and permitting	The program should carry forward all objectives unless the City has amended the Zoning Ordinance prior to adoption of the 2027 – 2035 Housing Element.

Name of Program	Program Objective and Time Frame	Status of Implementation	Appropriateness and Update for 7th Cycle
		procedures.	
HI-1: Single Room Occupancy Units	Define and allow principally permitted in the Residential Multiple-Family (R-3), Mixed-Use (MU), Opportunity (O), and Planned Development Residential (PDR) zones. <u>Time Frame</u> : Amend the Zoning Code by December 2024.	In Progress	All objectives of the program should be carried forward unless the City has amended the Zoning Ordinance prior to adoption of the 2027 – 2035 Housing Element.
HI-1: 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 multifamily and mixed uses are permitted, including nonresidential zones permitting multi-family uses. <u>Time Frame</u> : Amend the Zoning Code by December 2024.	In Progress	The program objectives should be carried forward , and the program should be modified to include amending the Zoning Ordinance to permit supportive housing developments as required by GC § 65650 – 65656 (AB 2162, 2019). In accordance with GC § 65651, qualifying supportive housing developments shall be permitted by-right in zones where multifamily development and mixed uses are permitted, including nonresidential zones permitting multifamily uses. That is, R-1, R-2, R-3, RC, HC, PDR, MU, and O zones.
HI-1: 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). The Zoning Code amendment related to emergency shelters will be completed prior to adoption of the Housing Element. <u>Time Frame</u> : Amend the Zoning Code by December 2024.	Completed	The program should be modified . The City adopted amendments to its zoning regulations in 2022 to comply with SB 2's (2007) emergency shelter requirements. Further amendments to State law for emergency shelters took effect in 2023. The program is modified to commit the City to amend its Zoning Ordinance to comply with State law, i.e., AB 2339.

Name of Program	Program Objective and Time Frame	Status of Implementation	Appropriateness and Update for 7th Cycle
HI-1: 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. <u>Time Frame:</u> Amend the Zoning Code by December 2024.	In Progress	All objectives of the program should be carried forward unless the City has amended the Zoning Ordinance prior to adoption of the 2027 – 2035 Housing Element. The program should also be modified to allow employee housing consistent with the California Health and Safety Code Section 17021.8, because there are lands within the City limits designated in the Land Use Element as Agricultural.
HI-1: Density Bonus	Comply with state density bonus law (GC § 65915, as revised). Promote the density bonus through informational brochures, which will be displayed at City Hall. <u>Time Frame:</u> Amend the Zoning Code by December 2024.	In Progress	The program's objectives should be carried forward , while also modified to add metrics to improve the evaluation of its effectiveness. Also, to include a commitment to publish density bonus law information on the City's website.
HI-1: 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. <u>Time Frame:</u> Amend the Zoning Code by December 2024.	In Progress	The program should be carried forward unless the City has amended the Zoning Ordinance prior to adoption of the 2027 – 2035 Housing Element. The program should also be modified to add details to improve specificity, and include milestones and metrics to better evaluate the program's effectiveness. Also, expressly extend reasonable accommodation requests to include providers or developers of housing for individuals with disabilities. Also, add details clarifying that the

Name of Program	Program Objective and Time Frame	Status of Implementation	Appropriateness and Update for 7th Cycle
			program's objectives include ensuring that individuals with disabilities have an equal opportunity to access housing.
HI-1: 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.” <u>Time Frame:</u> Amend the Zoning Code by December 2024.	In Progress	The program’s objective to amend the Zoning Ordinance’s definition of family should be carried forward unless the City has amended the Zoning Ordinance prior to adoption of the 2027 – 2035 Housing Element. Also, the program should be modified to ensure amendments to the Zoning Ordinance comply with Housing Element, AFFH, and fair housing laws by not inappropriately requiring all group homes that provide services to more than 6 residents, regardless of licensing, that operate as single family residences, to obtain a use permit, site plan approval, or other special approvals to locate in single family zones.²
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 GC § 65660 – 65668. <u>Time Frame:</u> Review zoning in 2023. Make any necessary revisions December 2024.	In Progress	The program’s objective to amend the Zoning Ordinance should be carried forward unless the City has amended the Zoning Ordinance prior to adoption of the 2027 – 2035 Housing Element to permit low barrier navigation centers

² [1] <https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/group-home-technical-advisory-2022.pdf>, accessed June 11, 2026.

Name of Program	Program Objective and Time Frame	Status of Implementation	Appropriateness and Update for 7th Cycle
			by-right in accordance with 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, fair housing practices, nearby social services, housing rehabilitation programs, weatherization programs, local employment opportunities <u>Time Frame:</u> Ongoing, as programs are available. Programs will be publicized quarterly, at a minimum.	Continuous	The program should be modified to include 1) explore partnering with the Blue Lake Resource Center as another information distribution hub; and 2) if the Blue Lake Resource Center is able to partner with the City, providing marketing materials (e-formats and printed) to the Resource Center. Also, at least once a year during the planning period, table at one of the Resource Center's community distribution events.
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. <u>Time Frame:</u> Annually apply as NOFAs are released.	Continues	The program's objective to assist first-time homebuyers should be carried forward , and modified to include contacting and collaborating with neighboring and regional jurisdictions to evaluate opportunities for partnerships to support lower and moderate income homebuyers, including sweat-equity programs.
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;	Continuous	All of the program's objectives and actions should be carried forward . Additionally, the program should be modified to: 1) specify that additional incentives for housing assured to be affordable to target populations include flexibility in development and parking standards, as well as allowances for bonus ADUs; 2) offer fee waivers, reductions, or deferments, when

Name of Program	Program Objective and Time Frame	Status of Implementation	Appropriateness and Update for 7th Cycle
	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. <u>Time Frame</u>: Annual outreach to developers, prioritize local funding at least twice in the planning period, and support expediting applications on an ongoing basis.		financially feasible; and 3) commit the City to working with lower-income housing providers and funders to construct or acquire a variety of types of lower-income housing opportunities for individuals and groups with special needs and extremely low-income households, if applicants come forward. Specific housing types include: • Smaller units, including single-room occupancy units. • Senior housing, including assisted living facilities. • Units with special adaptations for people with disabilities, per California Title 24 standards, such as floorplan designs that have handicap-width doorways and hallways and open designs with few walls.
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. <u>Time Frame</u>: Ongoing; as projects are processed, and program informational materials are made available.	Continuous	The program's objective should be carried forward and modified to combine with Program HI-9 to facilitate the rehabilitation of the existing housing stock.

Name of Program	Program Objective and Time Frame	Status of Implementation	Appropriateness and Update for 7th Cycle
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. 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.	In Progress	The program should be deleted . Although Blue Lake is subject to the Streamlined Ministerial Approval Process (“SMAP”, and previously referred to as SB 35), Blue Lake is not a US Census-designated Urban Area, or Urban Cluster or Urbanized Area designated by the US Census Bureau, as published in the Federal Register, Volume 77, number 59, on March 27, 2012. This means that there are no sites in the City that meet SMAP’s threshold site requirements pursuant to Government Code §§ 65913.4(a)(2) or 65852.24.
HI-8	Continue to require all projects to comply with the current version of Title 24 of the California Building Standards Code. Time Frame: Ongoing, as projects are processed.	Continuous	The program’s objective should be carried forward .
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. 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	Continuous	In 2023, the City completed a housing conditions survey. The program should be modified to include program HI-6’s provisions for weatherization. Also, develop, maintain, and promote a publicly accessible library on weatherization and rehabilitation resources; annually investigate state and federal housing rehabilitation grant programs, and collaborate with regional partners to pursue appropriate funding; to extent feasible provide technical assistance through the City’s Building Department to homeowners

Name of Program	Program Objective and Time Frame	Status of Implementation	Appropriateness and Update for 7th Cycle
	quarterly basis with the County of Humboldt during the planning period.		who wish to repair and improve the habitability and weatherization of existing housing; accept anonymous complaints, and continue to perform code enforcement to improve housing units that have habitability issues in order to conserve the inventory of housing.
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	In Progress	The program should be modified to reflect that the 2027–2035 Housing Element incorporates an AFFH Action Plan and commits the City to implementing the Action Plan throughout the 7th Cycle planning period.

Name of Program	Program Objective and Time Frame	Status of Implementation	Appropriateness and Update for 7th Cycle
	completing Census questionnaires. – Review the Zoning Code and other City codes and policies for consistency with the fair housing law. <u>Time Frame</u>: Create Plan within three years of adoption of the Housing Element, and implement on an ongoing basis.		
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 existing community events – Increase opportunities for development of cottage industries/home occupations that are compatible with neighborhood character and environmental constraints <u>Time Frame</u>: As feasible, hold annual meetings between the City Council, Economic Development Commission, and Business Community.	Continuous	The program objectives to bolster the City's economy, promote affordable housing, and increase employment opportunities should be carried forward. The program should also be modified to remove subjective language and ambiguity (e.g., that <i>existing</i> community events will be promoted). Section 17.24.060 of the Zoning Ordinance provides for a range of home occupations that qualify for administrative review and approval and those that require Planning Commission approval. Section 17.24.060 specifies reasonable and typical objective performance standards that ensure licensed home occupations are incidental and secondary to the residential use. Program modifications include commitments for the City to amend the regulations to update the following provisions: 1) update the allowance for family child care homes (aka in-home day cares) to be consistent with Health and Safety Code § 1597.30 et seq.; and

Name of Program	Program Objective and Time Frame	Status of Implementation	Appropriateness and Update for 7th Cycle
			2) remove the listing of residential care homes for six or fewer persons. Additionally, the modified program commits the City to promoting home occupations and cottage industries on the City's website. As part of this effort, the City may consider modernizing some of the listed occupations, e.g., "typing" and "word processing".
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/). <u>Time Frame</u> : 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.	Continuous	The program's objectives should be carried forward and modified to add metrics to improve the evaluation of its effectiveness. Also, modify to include RCRC's service information on the City's website.
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. <u>Time Frame</u> : Ongoing, as projects approach expiration.	Not Yet Started	The program should be modified . As analyzed in Chapter 5, there are no at-risk assisted housing developments in the City. This program will be modified to include identification of funding available for mobilehome owners to rehabilitate or replace units in existing parks to facilitate conservation of a housing stock that is traditionally affordable by design.

Name of Program	Program Objective and Time Frame	Status of Implementation	Appropriateness and Update for 7th Cycle
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. <u>Time Frame:</u> 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).	Completed	The program was completed in December 2025 by the adoption of Ordinance 546-2025.
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. <u>Time Frame:</u> 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.	In Progress	The program objectives should be carried forward . The Conservation Element is currently embedded in the Land Use Element. It is consistent with the objectives of this program for the City to elect to prepare and adopt a stand-alone Conservation Element.
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.	In Progress	The program should be modified for the City to establish a written procedure that grants priority for water and sewer service to developments with units

Name of Program	Program Objective and Time Frame	Status of Implementation	Appropriateness and Update for 7th Cycle
	<u>Time Frame</u> : Set up a process by December 2024; ongoing as projects are processed.		affordable to lower-income households pursuant to Government Code § 65589.7 as the provider of water and sewer services.
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. <u>Time Frame</u> : 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.	Continuous	The program's objective to monitor the production and affordability of ADUs and JADUs as part of the annual progress report process should be carried forward . To increase ADU/JADU awareness and facilitate production, the program should be modified to include proactively promoting ADUs, disseminating information using the City's website and social media channels, and tabling at a community event (e.g., farmers market). An additional program modification commits the City to developing a program for the preapproval of accessory dwelling unit plans pursuant to Government Code § 65852.27. Program modifications include adding metrics to better evaluate the program's effectiveness.
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).	In Progress	All objectives of the program should be carried forward .

Name of Program	Program Objective and Time Frame	Status of Implementation	Appropriateness and Update for 7th Cycle
	<u>Time Frame</u> : The improvements to the wastewater treatment plant will be completed within two years of adoption of the Housing Element.		
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	In Progress	The program objectives to remove potential constraints to the development of multifamily housing, and other specific amendments to the PD-R, R-2, and MU Zones should be carried forward. In addition, the program should be modified to include amendments that ADUs, JADUs, and Density Bonuses are governed by State law since the City will continue to apply State standards, as discussed under HI-1. Additional program modifications include amendments to the PD-R Zone to replace subjective standards (which extend to cross-referenced regulations) and the procedure (see D.4) with objective standards and procedures for residential development, while not imposing new burdensome requirements. Also, the amendments should allow for flexible lot sizes to facilitate more affordable homeownership opportunities while protecting sensitive resources and avoiding hazards without requiring a rezoning. Other modifications should include a commitment that the City will explore expanding by-right housing types to include missing middle

Name of Program	Program Objective and Time Frame	Status of Implementation	Appropriateness and Update for 7th Cycle
	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. <u>Time Frame:</u> Amend the Zoning Code by December 2024.		housing types, such as duplexes, triplexes, fourplexes, courtyard buildings, bungalow courts, cottage housing, and townhouses, to provide middle-class and workforce housing.
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. <u>Time Frame:</u> The required documents will be uploaded to the City's website within one-year of the adoption of the Housing Element.	In Progress	The program objectives should be carried forward and modified to include a commitment to maintain and update annually, and within 30 days of any changes. Also, the program modification includes expanding the posted information to include: • Fair housing laws from the Department of Housing and Community Development, State Fair Employment, and Housing Commission's enforcement program; • Programs and funding sources for homeowners at risk of foreclosure, • Information on energy conservation opportunities.
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	In Progress	The program should be modified to include removing the subjective purpose language of § 17.24.250, in particular, "...harmonious development, the stability of land values and investments...the erection of structures of unsightly appearance".

Name of Program	Program Objective and Time Frame	Status of Implementation	Appropriateness and Update for 7th Cycle
	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. <u>Time Frame</u>: Amend the Zoning Code by December 2024.		Additionally, the adoption of objective standards shall demonstrate consistency with meeting the City's RHNA and facilitate and accommodate development at permitted densities. [Reference: Government Code 65589.5(f)] Moreover, objective standards shall not pose a barrier to the maintenance, improvement, or development of a variety housing for all income levels. [Reference: Government Code 65583]
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. <u>Time Frame</u>: Amend the Zoning Code by December 2024.	In Progress	The program should be modified to ensure that the design guidelines are recommendations and not enforceable standards extends to all types of residential development. Additionally, program modifications commit the City to striking C.2 of § 17.16.120 in its entirety. According to subsection C.1 of § 17.16.120, Design Review Procedure, it is intended to apply to structures listed on the Blue Lake Historical Building Register and real property subject to an historical zoning overlay. Subsection C.2, however, grants the "City Planner or Mayor discretion to refer other development projects to the Planning Commission for review and comment when in their judgment the projects might have a significant impact on the aesthetic character of

Name of Program	Program Objective and Time Frame	Status of Implementation	Appropriateness and Update for 7th Cycle
			the City.” While the PC’s review and input are advisory, the trigger for invoking this procedure is vague and entirely subjective. As such, it is a potential barrier because it can increase the time and cost of permitting a housing development.
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.). <u>Time Frame:</u> 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.	Continuous	The program's objectives should be carried forward and modified to add metrics to improve the evaluation of its effectiveness. An additional modification should include the implementation of an ongoing, project-by-project evaluation of each approved residential development to ensure that sufficient adequate site capacity is available to accommodate the remaining RHNA by income category throughout the planning period in compliance with No Net Loss law (Government Code § 65863).

Chapter 4 – Housing Element Goals, Objectives, and Programs

Introduction

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 due to the specific requirements of State Housing Element law. 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.

Programs are the specific action steps the locality will take to implement its policies and achieve its goals and objectives. Programs must include a specific implementation time frame and identify the agencies or officials responsible for implementation. Effective program descriptions also include:

- Action steps with a time frame for completion
- Proposed measurable outcomes, where appropriate
- Actions targeted to specific neighborhoods, as appropriate (also referred to as placed-based strategies)
- Potential funding sources

To make adequate provision for the housing needs of people of all income levels, State law, subdivision (c) of Government Code § 65583, requires that the City, at a minimum, identify programs that do all the following:

- Identify adequate sites, with appropriate zoning and development standards and services to accommodate the locality’s share of the regional housing needs for each income level.
- Assist in the development of adequate housing to meet the needs of extremely low-, very low-, low-, and moderate-income households.
- Address and, where possible, remove governmental constraints to the maintenance, improvement, and development of housing, including housing for people at all income levels, as well as housing for people with disabilities.
- Conserve and improve the condition of the existing affordable housing stock and preserve assisted housing developments at risk of conversion to market-rate housing.
- Promote equal housing opportunities for all people, regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability.

The programs below identify the actions that will be taken to ensure the City can accommodate its share of the regional housing need for each income level at all times during the 7th Cycle planning period. The programs also address identified housing issues in Blue Lake and approaches to meet State Housing law requirements.

Goal HG-1: Ensure adequate sites for a variety of housing types and tenures to meet the existing and future needs of City residents, including all household types and incomes.

- HP-1.1 Provide and maintain an inventory of adequate and suitable sites to accommodate Blue Lake's RHNA throughout the planning period (2027-2035).
- HP-1.2 Encourage and facilitate a variety of housing types and tenures to meet the needs of all residents at all income levels.
- HP-1.3 Implement land use policies and standards that allow for a range of residential densities and housing types that will enable households of all types and income levels opportunities to find suitable ownership and rental housing in the City.
- HP-1.4 Encourage the development of residential units and the provision of related services for special needs groups, including the elderly, large households, single parents, persons with disabilities, extremely low-income persons, and persons experiencing homelessness.
- HP-1.5 Encourage infill development and redevelopment of land to provide adequate residential sites.
- HP-1.6 Facilitate the development of accessory dwelling units on single-family properties citywide.

Goal HG-2: Address and where legally possible, remove governmental constraints to improve opportunities for the maintenance, improvement, development, and redevelopment of housing for all income levels and housing for persons with disabilities.

- HP-2.1 Review, amend, and update residential development standards, regulations, ordinances, and processing procedures related to rehabilitation and construction that are determined to constrain housing development.
- HP-2.2 Encourage multi-family developments on lots that are 0.50 acres or larger in the Mixed-Use (MU), Opportunity (O), and Planned Development Residential (PDR) zones.
- HP-2.3 Utilize density bonuses, fee reductions, or other regulatory incentives, as available and appropriate, to minimize the effect of governmental constraints.
- HP-2.4 Monitor State housing-related legislation, and update City plans, ordinances, and processes as appropriate to remove or reduce governmental constraints.
- HP-2.5 Minimize zoning and other regulatory barriers to the placement and operation of housing facilities for the homeless and special needs populations in appropriate locations throughout the City.

Goal HG-3: Encourage the development of housing affordable to acutely-, extremely-, very low-, low-, moderate-income levels, and for special needs households.

- HP-3.1 Encourage the development of a variety of housing types in the residential and mix-use areas that offer choices for all members of the community.
- HP-3.2 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.
- HP-3.3 Encourage the use of private-initiated and 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.

Goal HG-4: Promote the conservation and preservation of Blue Lake's existing housing stock.

- HP-4.1 Promote and encourage conservation and rehabilitation of the City's existing housing stock, with emphasis on structures that have fallen into disrepair.
- HP-4.2 Promote and encourage the conservation of the City's more affordable housing stock.
- HP-4.3 Encourage and facilitate resident involvement in property maintenance and efforts to improve the condition of housing units and overall neighborhood quality.
- HP-4.4 Promote energy conservation and efficacy. Specific areas of concern include energy efficiency, electrical wiring, foundation stability, and prevention of water damage.

Goal HG-5: Ensure equal opportunity and access to housing for all residents.

- HP-5.1 Promote housing opportunities for all persons regardless of race, color, religion, sex, family size, marital status, national origin, or ancestry. Support appropriate safeguards to ensure fair housing opportunities.
- HP-5.2 Encourage equal opportunity for persons with disabilities to use or enjoy housing in new or rehabilitated residential and commercial developments by establishing and implementing reasonable accommodation procedures that allow more flexibility relating to zoning, density, reduced setbacks, or other regulatory incentives.
- HP-5.3 The City will promote awareness of accessibility requirements and opportunities for builders, developers, and residents.
- HP-5.4 The City will provide equal access to its development policies, practices, and procedures to all residents of the City.

- HP-5.6 The City shall provide information related to fair housing services to residents and property owners.
- HP-5.7 The City shall support programs and housing developments that support inclusive, racially and ethnically diverse, and mixed-income residential communities throughout the city, such as intergenerational housing, and large family units.
- HP-5.8 The City shall support ongoing efforts of federal, state, regional, and local efforts to affirmatively further fair housing through the enforcement of fair housing laws and prohibiting discrimination in the development, financing, rental, or sale of housing.

Program HI-1 Improve Funding Availability to Support Implementation

Funding is the City's largest constraint to implementing the State's myriad of housing requirements. While the City works diligently to implement all programs within the Housing Element Update, its General Fund is limited and implementation of every program is not possible without additional grant funding. Currently-available grant funding, however, is also insufficient to implement all the programs required by the State. In recognition of the discrepancy between State requirements and funding availability:

- A) Engage State representatives and the State Department of Housing and Community Development (HCD) to discuss the issues, potential solutions, and available funding for housing element implementation.
- B) Engage HCD to seek technical assistance and direct support with completing implementation measures.
- C) Beginning three (3) years after the adoption of the Housing Element, the City will create an annual action plan for implementation that prioritizes key actions and programs, evaluates available funding, and identifies funding gaps that limit implementation.
- D) Engage local agencies, the Continuum of Care, non-profit groups, and other community stakeholders to pursue partnerships in pursuit of funding or to assist in implementation based on shared goals.
- E) Annually evaluate and report on progress in implementation.
- F) Review progress in implementation in 2031 and revise programs, as necessary, to respond to new opportunities and remove ineffective or infeasible actions.

Responsibility: City Council, City Manager, Planning Department,

Time Frame: Annually

Funding: General Fund, State grant funding and technical assistance

Priority: Highest.

Program HI-2 State Law Compliance

Amend the Zoning Ordinance to comply with State law:

A) Accessory dwelling units. Repeal Zoning Ordinance § 17.24.270 in its entirety, and amend any other zoning provisions that regulate ADU and/or JADU development (e.g., section 17.24.100.A, Off-Street Parking Requirements) to comply with current State ADU law. Additionally, the Zoning Ordinance will be amended to include explicit language that ADUs and JADUs must be rented for period of no less than 30 days.

B) Manufactured housing and mobile homes. Amend the Zoning Ordinance to 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 § 65852.3). This includes, but is not limited to, allowing manufactured homes on a permanent foundation as a single-family use.

C) Single room occupancy units. Amend the Zoning Ordinance to define and allow single room occupancy (SROs) units as a principally permitted use in the Residential Multiple-Family (R-3), Mixed-Use (MU), Opportunity (O), and Planned Development Residential (PDR) zones, and subject to only objective standards.

D) Transitional and Supportive Housing. Amend the Zoning Ordinance to define and allow transitional and supportive housing consistent with State law (Government Code § 65582). Permit transitional and supportive housing in all zones that allow residential uses and subject to only the same restrictions on residential uses contained in the same type of structure.

E) Supportive housing developments. Amend the Zoning Ordinance to allow supportive housing developments without discretionary review in all zones that allow multifamily housing or mixed-use development, including nonresidential zones, as applicable, with corresponding development standards as detailed in AB 2162. In accordance with Government Code subdivision (a) of Government Code § 65651, the zoning districts that shall allow qualifying supportive housing developments by-right are the R-2, R-3, RC, HC, PDR, MU, and O zones.

F) Emergency shelters and low barrier navigation centers. Amend the Zoning Ordinance to comply with State law for these types of housing and shelter. The City may elect to chapter its amended emergency shelter regulations, including those for low barrier navigation centers, either as part of Chapter 17.24, General Provisions and Exceptions, or into a new standalone chapter in Title 17. The amendments shall accomplish the following:

- 1) Permit low-barrier navigation centers, defined as low-barrier, temporary, service-enriched shelters to help homeless individuals and families quickly obtain permanent housing, by-right in zones where mixed uses are allowed or in nonresidential zones that permit multifamily housing [Reference Government Code § 65660]. In accordance with Government Code subdivision (a) of Government Code

§ 65660, the zoning districts that shall allow low barrier navigation centers by-right are the RC, HC, MU, and O zones.

- 2) Address the current emergency shelter regulations' inconsistencies with State law and the constraints identified in Chapter 6. The amendments shall include language to ensure that emergency shelters are not subject to the Opportunity Zone performance standards that exceed those specified in Government Code § 65583(a)(4)(B). Additionally, the amendments shall address all of the following:
 - a) The expanded definition of emergency shelters to include other interim interventions as specified.
 - b) The existing 15-bed limit has been identified as a constraint in relation to the 2024 Point In Time count estimate for the number of persons who are unhoused in the Blue Lake Area.
 - c) An off-street objective parking standard for emergency shelters that specifies this use shall provide sufficient parking to accommodate all staff working in the emergency shelter. The standard shall not require more parking for emergency shelters than other residential or commercial uses within the same zone.
 - d) The following Opportunity Zone lighting performance standards that are subjective:
 - E.3.b: “All lighting fixtures shall be the minimum lumens required for safety and security”.
 - E.3.d: “No permanently installed lighting shall blink, flash, or be of unusually high intensity or brightness”, the subjective language is underlined.

G) Employee housing. Amend the Zoning Ordinance to comply with the State Employee Housing Act (Health and Safety Code §§ 17021.5 through 17021.8) for farmworker and employee housing. This includes all of the following amendments:

- 1) Amend the Zoning Ordinance to allow agricultural employee housing for six or fewer persons by-right in the Residential One-Family (R-1) zoning district, and other zones that permit single-family dwellings, subject to the same regulations as a single-family dwelling.
- 2) Amend the Zoning Ordinance 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. Additionally, amend the Zoning Ordinance to allow employee housing consistent with the California Health and Safety Code Section 17021.8, because there are lands within the City limits designated in the Land Use Element as Agricultural.
- 3) Amendment of the definition of “Farm Dwelling” in the Zoning Ordinance to be consistent with Health and Safety Code §§ 17001 and 17021.6(a); and employee housing meeting the requirements set forth in Health and Safety Code § 17021.8 in the AE zone.

H) Housing for Persons with Disabilities. Amend the Zoning Ordinance to allow housing for special needs groups, including persons with disabilities, in the same manner as other residential development in the same zone. The amendments shall

remove regulatory barriers and allow for development of a range of group and assisted care housing for individuals with disabilities by ensuring appropriate zoning for all ranges of housing from group housing, independent living with services on-site, and institutional care facilities. The City shall allow housing for special needs groups including persons with disabilities in all zones allowing residential uses, including zones permitting single family dwellings, in compliance with applicable Health and Safety Codes. The amendments to the Zoning Ordinance shall allow:

- 1) Amend the definition of family. The amendments shall not overly scrutinize living arrangements, require that residents be related by blood, marriage, or adoption, or impose a zoning limit on the number of unrelated people (e.g., “One or more persons living together in a dwelling unit”) to ensure they are consistent with State housing law. In preparing the amendments, it is recommended that the City consult the Department of Housing and Community Development (HCD) Group Home Technical Advisory published December 2022.
- 2) Amend the Zoning Ordinance to provide for a definition of group care homes that is consistent with State and federal law.
- 3) Amend the Zoning Ordinance to allow for group care homes with six or fewer persons, regardless of licensing, that operate as single-family residences and that provide licensable services to six or fewer residents by-right in zones that permit single-family dwellings, subject only to the generally applicable, nondiscriminatory health, safety, and zoning laws that apply to all single-family residences. If requested, the City shall provide flexible and efficient reasonable accommodation(s) in the permitting process. If requested, the City shall provide flexible and efficient reasonable accommodations in the permitting process.
- 4) Amend the Zoning Ordinance to not inappropriately require that all group care homes that provide services to 7 or more residents, regardless of licensing, that operate as single family residences, to obtain a use permit, site plan approval, or other discretionary or special approvals to locate in single family zones. The City may elect to require group care homes that are subject to State licensing and that provide services to 7 or more residents to obtain a use permit to operate. Should the City require a use permit for these group care homes, the use shall be subject only to development, performance, and design standards that are objective, and to nondiscriminatory health, safety, and zoning laws that apply to residential development in the same zoning district. Additionally, the use permit findings shall provide for approval certainty. If requested, the City shall provide flexible and efficient reasonable accommodations in the permitting process.
- 5) Develop and formalize an administrative process that a person with disabilities or provider of housing for persons with disabilities to request reasonable accommodation in order to accommodate the needs of persons with disabilities and streamline the permitting process. The City will provide information regarding the City’s 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.

I) Density Bonus. Establish local procedures that are consistent with Government Code § 65915(a)(1) – (3) to facilitate the implementation of State Density Bonus Law. The City may elect to prepare and adopt local procedures based on HCD’s State Density Bonus Law Sample Ordinance.

J) Non-conforming multi-family residential. The City shall amend § 17.28.060 of the Zoning Ordinance to allow for the rehabilitation and reconstruction of non-conforming multi-family buildings consistent with Government Code § 65852.25.

Responsibility: City Council, City Manager, Planning Department,

Time Frame: Within three (3) years from adoption of the Housing Element.

Funding: General Fund, State grant funding, and technical assistance

Priority: Highest.

Program HI-3 Remove PDR Zone Development Constraints

The City will amend § 17.16.080 of the Zoning Ordinance to remove Planned Development Residential or PDR Zone’s regulatory and procedural constraints to the development of a variety of housing types, tenures, including housing affordable to lower- and moderate-income households:

A) Zoning Ordinance § 17.16.080(C)(1)(b) requires a maximum ground coverage standard of 40% 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).

B) Zoning Ordinance § 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.

C) Zoning Ordinance § 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

Rear – 20% 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.

D) Zoning Ordinance §§ 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.

E) Replace subjective standards, procedures, and findings with those that are objective while not unduly constraining the development of a variety of housing types and tenures for all income levels. The findings for approval shall provide for approval certainty. Standards in other sections of the Zoning Ordinance that are subjective and are incorporated into the PDR Zone by way of cross-reference shall also be amended to be objective.

F) To avoid inhibiting housing projects from achieving the planned density and realistic capacity, amendments that allow reductions of the 6,000 square foot minimum lot size to facilitate clustering residential development while protecting sensitive resources and avoiding hazards without requiring a rezoning.

As part of preparing the Zoning Ordinance amendments to the PDR Zone, the City shall take the following actions:

- The City shall explore expanding by-right housing types to include missing middle housing types, such as duplexes, triplexes, fourplexes, courtyard buildings, bungalow courts, cottage housing, and townhouses, to provide middle-class and workforce housing.

Responsibility: City Council, City Manager, Planning Department,

Time Frame: Within three (3) years from adoption of the Housing Element.

Funding: General Fund, State grant funding, and technical assistance

Priority: High

Program HI-4 Residential Development Regulatory Procedure

The City shall develop, adopt, and implement a regulatory procedure that allows residential development to be principally permitted (by-right) without discretionary review (e.g., Site Plan Approval) when the proposed development complies with all applicable objective City development standards and is located outside of environmentally sensitive areas or hazardous areas for the R-2, R-3, PDR, MU, and O zoning districts. This program is to result in a regulatory procedure that replaces the Site Plan Approval procedure.

A) Amend the Zoning Ordinance to include associated administrative procedures establishing a principally permitted approval process for qualifying residential developments. The by-right residential development regulatory procedure shall be offered in the R-2, R-3, PDR, MU, and O zoning districts, and include a variety of housing types and tenures, for all income levels.

B) 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 design standards.

C) Define objective project eligibility criteria. The eligibility criteria shall not be overly burdensome and shall be inclusive of a variety of housing types, tenures, and income levels. Project eligibility criteria that should be incorporated include:

- 1) The project consists of residential or mixed-use development that is consistent with the applicable land use designation and zoning district.
- 2) The project complies with all objective development, design, and performance standards of the City. The City should consider incorporating performance standards related to low-impact development, reduction in impervious surfaces, on-site stormwater retention, and biofiltration.
- 3) The project meets applicable infrastructure and public-service requirements.
- 4) The project avoids environmentally sensitive areas, including wetlands, riparian corridors, sensitive habitats, steep slopes, and other areas designated for environmental protection by local, state, or federal regulations.

C) Establish a ministerial review process that provides timely approval of eligible projects and limits review to verification of conformance with objective standards and environmental avoidance requirements.

D) Update the Zoning Ordinance, development application materials, and administrative guidelines as necessary to implement the principally permitted approval process.

E) Provide training to staff and develop informational materials for applicants regarding the new procedure and applicable eligibility requirements.

Responsibility: City Council, City Manager, Planning Department.

Timeframe: Draft ordinance within 4 years of Housing Element adoption, and adopt within 5 years of Housing Element adoption.

Funding Source: General Fund, Planning Department budget, and applicable grant funding.

Priority: High.

Program HI-5 Discretionary Permit Procedures and Findings that Provide for Approval Certainty

The City shall amend the Zoning Ordinance as specified below to increase approval certainty for residential development that is subject to a use permit, and for residential development seeking a substitution or exemption from the § 17.24.260 development standards in accordance with paragraph (B) of § 17.24.260. The following actions will accomplish its objective:

A) The City shall replace any existing subjective language in each residential zoning district's purpose statement with objective language.

B) Approval certainty can be increased by developing and adopting procedures, findings, and other regulatory updates that:

- Translate the intent of the findings into objective criteria. This could be a decision matrix or scoring system tied to General Plan and density compliance; defining what constitutes "accord with the zone purpose".
- Adopt a uniform set of objective findings for housing-related use permits.
- Create a special use permit process or overlay standards specifically for housing that provides a streamline pathway for qualifying projects.
- Adopt an internal and public-facing guidance manual explaining how to interpret zone purpose statements.

Responsibility: City Council, City Manager, Planning Department.

Timeframe: Draft ordinance within 4 years of Housing Element adoption, and adopt within 5 years of Housing Element adoption.

Funding: General Fund, State grant funding, and technical assistance.

Priority: High.

Program HI-6 Removal of Other Regulatory Barriers and Constraints

The City shall amend the General Plan and Zoning Ordinance as follows:

A) Amend the descriptions of the land use designation in the General Plan Land Use Element to replace "net acreage" with "gross acreage" and to add a definition of density to the Land Use Element and Zoning Ordinance. The definition of "gross acreage" shall be consistent with the Zoning Ordinance's definition of "lot area."

B) Amend both the Land Use Element and Zoning Ordinance to specify the following for non-density bonus housing projects:

- Density calculations that result in fractional units of less than 0.50 units shall be rounded down to the next whole number
- Density calculations that result in fractional units equal to or greater than 0.50 shall be rounded up to the next whole number.

Accessory dwelling units and junior accessory dwelling units shall be excluded from density calculations consistent with State ADU law.

C) Amend the Special Density (D) Combining Zone to include provisions to allow for smaller parcel sizes as part of the application of the D Combining zone to a site, in particular to encourage the creation of a variety of housing types, including affordable ownership housing, and to avoid inhibiting housing development projects from achieving the planned density and realistic capacity.

D) To subsection C.2 of § 17.16.120 of the Zoning Ordinance (Design Review Procedure), the City shall either add qualifying language that expressly exempts housing developments or strike C.2 of § 17.16.120 entirely.

E) The City shall strike the language of “new housing concepts” from § 17.24.160 of the Zoning Ordinance (Special Study Zones).

F) Expressly exclude ADUs and JADUs from the application of the 20-foot minimum width requirement that is specified in § 17.24.260 of the Zoning Ordinance (Development Standards).

Responsibility: City Council, City Manager, Planning Department.

Timeframe: Draft ordinance within 4 years of Housing Element adoption, and adopt within 5 years of Housing Element adoption.

Funding: General Fund, State grant funding, and technical assistance

Priority: High.

Program HI-7 Water and Sewer Capacity

This program has short-term and long-term objectives. The short-term objective of the program is for the City to achieve compliance with State law. Long-term, this program seeks to address an infrastructure constraint related to a limited number of wastewater connections by committing the City to initiating and completing improvements.

A) To comply with Government Code § 65589.7, the City, as the sole water and sewer provider, the City will take the following actions:

- 1) The Planning Department will distribute the 7th Cycle Housing Element to the City Engineer and the Department of Public Works within 30 days of adoption, along with a summary of its Regional Housing Needs Allocation.
- 2) Establish a written procedure to grant priority for water and sewer service allocations to proposed developments that include units affordable to lower-income households within three (3) years from adoption of the Housing Element.

B) To address the potential for insufficient wastewater treatment capacity, 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, Planning Department,

Time Frame:

A) As specified above.

B) The improvements to the wastewater treatment plant will be completed within two (2) years of adoption of the Housing Element.

Funding: General Fund, grant funding, and technical assistance

Priority: Highest

Program HI-8 No Net Loss of Residential Capacity to Accommodate the RHNA by Income Category, and Monitoring of Overall Progress

To ensure the City maintains sufficient residential capacity to accommodate the RHNA for each income category at all times during the 7th Cycle, the City shall develop and implement a formal, ongoing (project-by-project) evaluation procedure pursuant to Government Code § 65863.

A) The evaluation procedure shall do all of the following:

- Track the number of acutely low, extremely low, very low, low, moderate, and above moderate-income units permitted and constructed to calculate the remaining unmet RHNA. By-right and discretionary units shall be tracked.
- Also track the number of units permitted and built on the identified inventory sites to determine the remaining site capacity by income category, and update continuously as by-right and discretionary developments are approved.
- The City will complete the required No Net Loss evaluation and written findings before or concurrently with approval of a residential development or land-use action.
- The City shall take no action to reduce the density or capacity of a site (e.g., downzone, moratorium) or create a shortfall in capacity by income category, unless other additional adequate sites are identified prior to reducing site density or capacity.
- If a development is being approved on an identified site at a lower density than what was assumed for that site identified in the Housing Element or would create a shortfall by income category, additional adequate sites must be made available within 180 days of approving the development.
- A program to identify the replacement sites, and take the necessary actions to make the site(s) available and ensure they are adequate sites, will be adopted prior to, or at the time of, the approval of the development.

B) In addition to the above, for the City-owned properties that are identified as inventory sites in the 7th Cycle Housing Element, i.e., APNs 025-201-023 and 312-161-015, “actions taken” shall also include the following City actions:

- Entering into agreements, including development agreements.
- Selling and/or leasing the whole of the sites, or a portion of the sites.

- Issuing licenses, permits, etc. for activities or development that may be temporary in nature.

C) Additionally, because APN 025-201-023 is identified by the City as ensuring the City has adequate capacity to accommodate its need for an emergency shelter, actions that would reduce the capacity of this site to provide emergency housing shall be monitored using the evaluation procedure described in A) above.

D) No less than 18 months following from the completion of Programs HI-2, HI-3, HI-4, HI-5, and HI-6, the City will annually review building development on the vacant and potentially developable sites included in the sites inventory of this element and produce an annual evaluation report. The annual evaluation will report the City's remaining unmet RHNA and remaining adequate-site capacity by income category, summarize applicable development approvals and land-use actions affecting RHNA sites. If the annual review report shows that sites are not providing sufficient opportunities for housing affordable to lower-income households, the City will review its Zoning Ordinance to consider other measures, including the adoption of incentives or regulatory mechanisms to further encourage construction at the mid-point or higher end of the density range. These measures could include but are not limited to:

- requiring a minimum residential density; and/or
- local density bonus provisions (i.e., specifying development standards that may be modified to make units more affordable – reduced lot sizes, increased ground coverage, etc.).
- Consider and pursue additional incentives to all ADUs or ADUs that could be deed restricted for meeting acutely- and extremely low-income households.

Responsibility: City Council, City Manager, Planning Department.

Time Frame:

A) Within six months of adoption of the Housing Element, the City will develop and implement a formal ongoing evaluation procedure pursuant to Government Code section 65863.

B) and C) On an ongoing basis, the City will monitor rezones and development of residential units, and update Housing Element sites inventory as needed. A status report of the City's Housing Element sites inventory will be posted on the City's website and will be updated at least once a year. At least annually, update the sites inventory in conjunction with Housing Element Annual Reports pursuant to Government Code section 65400, as necessary.

D) Within 18 months of completion of the specified Zoning Ordinance amendments.

Funding: General Fund

Priority: High.

Program HI-9 Improve Transparency, Visibility, and Awareness of the City's Regulatory Improvements and Initiatives for Housing

One objective of this program is for the City to meet the transparency requirements of Government Code § 65940.1. The second objective of this program is to improve the visibility and public awareness of the City's regulatory improvements and initiatives for housing. To achieve the objectives of Program HI-9, the City will take the following actions:

A) Obtain (if not currently available), maintain, update, and make publicly available information related to zoning ordinances, development standards, fees, exactions, and fair housing laws on the City's website in compliance with Government Code § 65940.1. New and updated materials shall be uploaded within 30 days of changes throughout the planning period. At a minimum the City will add and maintain the following list of documents:

- Schedule of fees.
- Zoning map.
- List of information required for a complete development application for the development of an ADU and a JADU.
- Current and five previous annual fee reports or the current and five previous annual financial reports.
- An archive of impact fee nexus studies, cost of service studies, or equivalent.
- Pre-reviewed and pre-approved ADU plans, such as those provided by the County of Humboldt as required by Government Code § 65852.27.
- Recent examples of successful applications, including for the City's off-street parking waiver process.

B) Encourage the development of affordable workforce housing by promoting the development of accessory dwelling units (ADUs), and missing middle housing types such as duplexes, triplexes, fourplexes, courtyard buildings, bungalow courts, cottage housing, and townhouses, through the following actions:

- Prepare informational handouts about ADUs, and missing middle housing tools and resources. Distribute this information using a variety of methods that may include in-person participation which may occur outside City offices and regular business hours (e.g., community events, farmer's markets; and direct contact with non-profit service providers, developers, and property owners), inclusion on City water bills, etc.
- Prioritize approval of applications for affordable ADU, ahead of other ADU applications.
- Consider and pursue additional incentives to all ADUs or ADUs that could be deed restricted for meeting acutely- and extremely low-income households.

Responsibility: City Manager, Planning Department.

Time Frame: Within three (3) years from adoption of the Housing Element.

Funding: General Fund, State grant funding, and technical assistance

Priority: Medium.

Program HI-10 Voluntary Upzoning to Improve the Supply of Land for a Variety of Housing Types and Tenures

This program is to encourage the development of a variety of housing types and tenures for all income levels by increasing the supply of sites suitable for small-scale denser multi-family development. This program will help address the limited availability of rental and ownership housing that is affordable to the local workforce by the City offsetting the costs to upzone eligible properties to either the R-2 or R-3 zones. For the program to be cost-effective, there will be a single period when property owners may nominate their property(ies) for inclusion in the program. Property owner participation is strictly voluntary.

Responsibility: City Council, City Manager, Planning Department.

Time Frame: Initiate within six (6) years from adoption of the Housing Element.

Funding: General Fund, State grant funding, and technical assistance

Priority: Low.

Program HI-11 Collaboration with Regional Partners

The City in furthering the implementation efforts of the Housing Element can increase engagement, outreach and greater collaboration with regional partners that include the cities and Humboldt County, developers, non-profits, and affordable housing advocates. Resources and workshops with HCD can also provide beneficial enhancements to the City's Housing Element implementation activities and efforts. By working together, the jurisdictions can share best practices, explore opportunities for further collaboration, and make the best use of limited resources. The following efforts shall be made to further regional collaboration:

- In collaboration with HCD, Humboldt County Association of Governments (HCAOG), and other jurisdictions, the City shall assist in coordinating a Countywide 7th Cycle Housing Element Working Group.
- The Housing Element Working Group (HEWG) shall meet at least annually to evaluate successes in the implementation of programs and to identify gaps and additional needs.
- The HEWG will coordinate with HCAOG on exploring potential opportunities to address region-wide issues.
- The City shall continue to participate in Countywide collaboration efforts on housing program implementation and regional issues including disadvantaged communities (SB 244 and SB 1000), infrastructure challenges, homelessness, and fair housing.

- The HEWG will meet periodically with the local and regional fair housing organizations to discuss fair housing issues and opportunities for education.
- The City will continue to seek partnerships with other jurisdictions in the region and other agencies such as housing developers, community stakeholders, and agricultural employers/employees to explore viable options for increasing the availability of housing (rental and purchase) affordable to lower- and moderate-income households in suitable locations in the region.
- The City shall coordinate with other jurisdictions to develop a multilingual directory of housing services and resources available in the region for lower-income households. The directory will include a chapter detailing housing services and resources that are available to farmworkers. The City shall coordinate with the other jurisdictions to review and update the directory periodically. The directory will be available on the websites and offices of the City and participating jurisdictions.

Responsibility: City Council, City Manager, Planning Department.

Time Frame: Within four (4) years from adoption of the Housing Element.

Funding: General Fund, State grant funding, and technical assistance

Priority: Medium.

Program HI-12 Encourage Local Economic Opportunities

The City will continue to encourage appropriately licensed/permitted cottage or home-base industries, including those related to recreation/tourism in the area to bolster the City's economy, promote workforce and affordable housing, and increase local business and employment opportunities with the following actions:

- Promoting existing community events to increase tourism revenues.
- Promote the City's existing cottage industries/home occupation regulations as a pathway for residents to improve business and employment opportunities.
- Prioritize the permitting cottage industries/home occupations that are consistent with the requirements of § 17.24.060 of the Zoning Ordinance.

Responsibility: City Council, City Manager, Planning Department.

Time Frame: Within six (6) years from adoption of the Housing Element.

Funding: General Fund, State grant funding, and technical assistance

Priority: Medium.

Program HI-13 Vulnerable Population Affordable Housing

The City is proposing to undertake the following activities to encourage development of housing assured to be affordable to target populations. Target populations include lower-income households including, acutely- and extremely low-income, and special needs housing for persons experiencing homelessness, seniors, single parent, and disabled households:

- A) Work with local non-profits on a variety of activities, such as conducting outreach to housing developers, AND service providers on an annual basis.
- B) Providing expedited processing;
- C) Offer fee waivers, reductions, or deferments, when financially feasible, or in-kind technical assistance.
- D) Identifying grant and funding opportunities, and applying for or supporting applications for funding.
- E) Reviewing and prioritizing available local funding at least twice in the planning period.
- E) Offer additional incentives beyond the density bonus such as flexibility in development and parking standards.
- F) Encourage lower-income housing providers and funders to construct or acquire a variety of types of lower-income housing opportunities for individuals and groups with special needs and acutely low- and extremely low-income households, if applicants come forward. Specific housing types include:
 - Smaller units, including single-room occupancy units.
 - Senior housing, including assisted living facilities.
 - Units with special adaptations for people with disabilities, per California Title 24 standards, such as floorplan designs that have handicap-width doorways and hallways and open designs with few walls.
- G) The City will explore and consider entering into a multi-jurisdictional agreement to provide housing and/or shelter for persons experiencing homelessness.
- H) Continue collaborating with the Blue Lake Resource Center as local information distribution hub.

Responsibility: City Council, City Manager, Planning Department.

Time Frame: Annual outreach to developers; prioritize local funding at least twice in the planning period if financially feasible; support expediting applications on an ongoing basis.

Funding: General Fund, State grant funding, and technical assistance

Priority: Medium.

Program HI- 14 Housing Stock Rehabilitation and Weatherization

Building on the findings of the 2023 housing conditions survey, the City will encourage the rehabilitation of existing housing units and the incorporation of weatherization improvements which include ceiling and floor insulation, caulking, weather-stripping, energy-efficient fixtures, and other measures that improve energy efficiency, habitability, and housing quality. The City will provide residents with information regarding available rehabilitation, weatherization, accessibility improvement, and energy-efficiency programs offered by other agencies. To the extent feasible, the City will develop, maintain, and promote a publicly accessible library of housing rehabilitation, weatherization, energy-efficiency, and financial assistance resources. The library would include information on available programs offered by programs such as the Redwood Coast Energy Authority, PG&E, and Energy Upgrade California™, as they become available. Once the library is compiled, the City will promote by posting on their social media and public bulletin boards.

The City will annually investigate state and federal housing rehabilitation and weatherization grant programs and will collaborate with the County of Humboldt and other regional partners to pursue appropriate funding opportunities. To the extent feasible, the City's Building Department will provide information and technical assistance to homeowners seeking to repair, rehabilitate, weatherize, or improve the habitability of existing housing units. The City will also continue code enforcement activities where there are code violations.

The City encourage the preservation of mobile home units, which constitute a housing stock that is traditionally affordable by design. The City will identify external funding opportunities that may assist mobile home owners with the rehabilitation or replacement of their units including those within an existing mobile home parks, and share with information with interested mobile home owners.

Responsibility: City Council, City Manager, Planning Department.

Time Frame: On an ongoing basis, the City provide information to residents. Also, the City will develop and publish the publicly accessible resource library within four years of adoption of the Housing Element. Beginning three years after Housing Element adoption, the City will annually review state and federal rehabilitation and weatherization funding opportunities throughout the planning period. Also on an ongoing basis, they will collaborate with regional partners to pursue appropriate funding as opportunities become available, provide technical assistance, accept anonymous complaints, and conduct code enforcement.

Funding: General Fund, State grant funding, and technical assistance

Priority: Medium.

Program HI-15 Accessibility Outreach

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/>). RCRC's service information would also be prominently included on the City's website. To evaluate the effectiveness of the program, the City will annually evaluate the using at least two of the following metrics:

- Number of referrals made to RCRC
- Number and type of informational materials distributed through City Hall, community events, electronic newsletters, social media, and local service providers
- At least one annual coordination contact with RCRC to verify that posted information remains current and to identify new services, outreach materials, or referral opportunities
- Number of residents or households requesting information about developmental-disability services, housing assistance, accessibility modifications, independent living, supported living, transportation, or related resources

Responsibility: City Council, City Manager, Planning Department.

Time Frame: Develop an outreach program within two years of adopting the Housing Element to assist persons with development disabilities. The City will promote it by posting on their social media and public bulletin boards.

Funding: General Fund, State grant funding, and technical assistance

Priority: Medium.

Program HI-16 Affordable Housing Funding

The City will encourage partnerships between affordable housing developers, nonprofit organizations, housing authorities, tribes, and other public agencies for the development of affordable housing by facilitating introductions and support funding applications. The City will submit funding applications as resources permit.

Responsibility: City Council, City Manager, Planning Department.

Time Frame: Annually HCD's schedule of upcoming notices of funding availability to identify potential available and appropriate funding.

Funding: General Fund, State grant funding, and technical assistance

Priority: Medium.

Program HI-17 General Plan Element Review

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. The Conservation Element is currently embedded in the Land Use Element. It is consistent with the objectives of this program for the City to elect to prepare and adopt a stand-alone Conservation Element.

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 revise strategies within one year, and amend the housing element for HCD review.

Time Frame: Monitor the Housing Element programs annually and submit to HCD by April 1 each year.

Responsibility: City Council, City Manager, Planning Department.

Time Frame: Adopt a standalone Conservation Element and update the Safety Element, and other Elements as necessary within five (5) years of adoption of the Housing Element.

Funding: General Fund, State grant funding, and technical assistance

Priority: Low.

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1.0 Introduction

The Housing Needs Assessment provides a demographic and housing profile of the city. This assessment also provides other important information to support the goals, policies, and programs of the Housing Element to meet the needs of current and future residents.

The Decennial Census, completed every 10 years, is an important source of information for the Housing Needs Assessment, as is the 2019 to 2024 American Community Survey Data. It provides the most reliable and in-depth data for demographic characteristics of a locality. The California Department of Finance (DOF) also provides valuable data that is more current and based on housing data submitted annually by the local jurisdiction. However, the housing data reported to the DOF does not use the same methodology as that housing units that reported to HCD as part of the annual progress report; therefore, there are discrepancies in the data sets. Whenever possible, DOF data and other local sources were used in the Housing Needs Assessment. Definitions of various U.S. Census Bureau terms used throughout this document are provided in Appendix E for clarification.

The Housing Needs Assessment focuses on demographic information, such as population trends, ethnicity, age, household composition, income, employment, housing characteristics, general housing needs by income, and housing needs for special segments of the population. It outlines the characteristics of the community, and identifies those characteristics that may have significant impacts on housing needs in the community.

2.0 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 indicators based on samples averaged over a five-year period. 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 or correlate with data from other sources.

The California Department of Finance is another source of valuable data and is more current than the census. The Department of Finance's population estimates were used for this analysis because they provide a more current and internally consistent dataset for evaluating local population trends over time, particularly for small communities such as Blue Lake. 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.

3.0 Population and Employment Trends

3.1 Population Change

As show in Table 5-1, Blue Lake's population has fluctuated but has generally declined slightly over the last 35-year period, dropping from 1,235 in 1995 to 1,136 in 2025, with periods of population growth (2000–2010) followed by steady decline after 2010, including a notable –5.57% decrease from 2020 to 2025. In contrast, Humboldt County experienced consistent growth from 1995 through 2015, peaking at around 136,500 residents, then plateaued between 2015 and 2020, and declined modestly in 2025 (-2.00%). The population trends are illustrated in Figure 1 and

Figure 2 below.

Table 5-1 – Population and Growth, 1995-2025

Year	Blue Lake Population	% Change	*Humboldt County (Total Population)	% Change
1990	1,235		119,118	
1995	1,209	-2.1%	124,721	4.7%
2000	1,142	-5.5%	126,476	1.4%
2005	1,212	6.1%	131,467	3.9%
2010	1,247	2.9%	134,353	2.2%
2015	1,232	-1.2%	136,542	1.6%
2020	1,203	-2.4%	136,547	0.0%
2025	1,136	-5.6%	133,817	-2.0%
Average Annual Change		-1.1%		1.7%

* = incorporated and unincorporated areas.

Source: California Department of Finance, E-4 Population Estimates for Cities, Counties, and the State, January 1, 1990-2025.

Figure 1 – Blue Lake Population Changes, 1990-2025

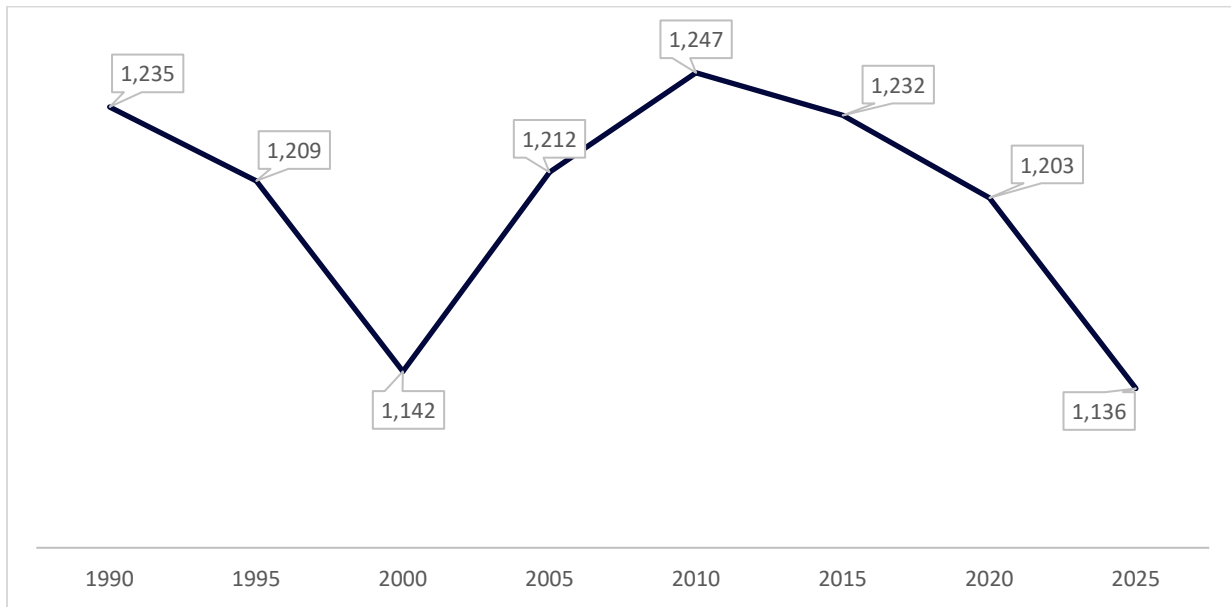
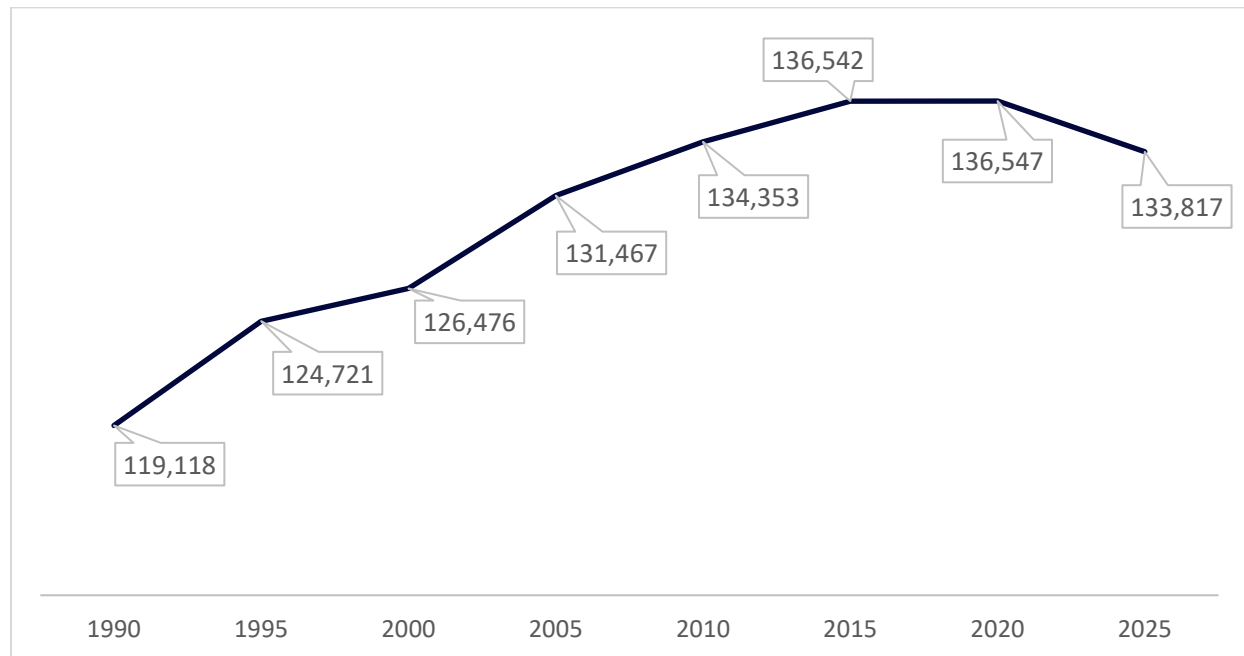


Figure 2 – Humboldt County Population Changes, 1990-2025



3.2 Population Growth Projections

The City's General Plan (1986) does not establish a projection of annual population change as part of the 20-year timeframe. A targeted update to the General Plan's Land Use Element was adopted in 2021, but did not project a rate of population change. The 2021 Land Use Element states that growth that occurs is necessary for the vitality of the town, but the qualities that make Blue Lake a desirable place to live are retained (pg. 9). To prepare this Housing Element, the City consulted the population projections prepared by the California

Department of Finance (DOF). The DOF provides projections for all counties through to 2070; however, DOF's population projections are available only at the county level and not for individual cities. Table 5-2 presents the DOF population growth projections for Humboldt County from 2020 to 2070. The DOF projects Humboldt county's population will show a steady, long-term population decline from 2020 to 2070, decreasing from 136,226 to 100,424, a loss of roughly 35,800 residents over 50 years. Each five-year interval reflects consistent negative growth, with annualized declines averaging about -3.0%, and the rate of decline generally intensifying over time, reaching its steepest levels after 2050 (greater than -3.5%).

Table 5-2 – Population Growth 2020-2070, Humboldt County

Year	Projected Population	Change	% Change
2020	136,226		
2025	132,806	-3420	-2.51%
2030	130,023	-2783	-2.10%
2035	126,762	-3261	-2.51%
2040	123,029	-3733	-2.94%
2045	119,313	-3716	-3.02%
2050	115,805	-3508	-2.94%
2055	112,087	-3718	-3.21%
2060	108,096	-3991	-3.56%
2065	104,282	-3814	-3.53%
2070	100,424	-3858	-3.70%
Average Annual Change			-3.00%

Source Demographic Research Unit, California
Department of Finance, March 2026, Report P-2A: Total
Population Projections, 2020-2070, California and
Counties.

3.3 Population by Race and Ethnicity, including Segregation and Integration Patterns and Trends

Table 5-3 presents population change within the City between 2010 and 2020 by racial and ethnic categories, along with Humboldt County data. As the table shows, the City of Blue Lake and Humboldt County became more racially and ethnically diverse between 2010 and 2020, although the County is more racially and ethnically diverse relative to Blue Lake: Blue Lake remains predominantly White and non-Hispanic, with White alone accounting for 78.2% of the population in 2020 and non-Hispanic residents comprising 92.1% of the population. However, both shares declined over the decade, reflecting increasing diversity. The Hispanic or Latino population grew from 6.5% to 8.0% in Blue Lake (a 17.1% increase), though it remains smaller than the County's 13.6% share. Among non-White populations, American Indian and Alaska Native residents represent the largest minority group in Blue

Lake, increasing from 3.7% to 4.4%, while other groups such as Black or African American and Asian populations remain relatively small in proportion.

The most notable demographic shift in Blue Lake was the rapid increase in residents identifying as multiracial. The population reporting two races grew from 2.8% to 6.9% (a 137.1% increase), with particularly strong growth in combinations involving White and American Indian or Alaska Native, as well as White and “Some Other Race.” Smaller multiracial categories, including those identifying with three or more races, also expanded. These trends mirror broader patterns in Humboldt County, where the White population also declined as a share and multiracial and Hispanic populations increased, though Blue Lake remains less diverse overall.

Table 5-3 – Population by Race/Ethnicity, 2010 and 2020

	Blue Lake					Humboldt County				
	2010		2020		% Change	2010		2020		% Change
	Est. Pop.	%	Est. Pop.	%		Est. Pop.	%	Est. Pop.	%	
Total:	1,253		1,208		(3.6%)	134,623		136,463		1%
Hispanic or Latino	82	7%	96	8%	17%	13,211	10%	18,535	13.6%	40%
Not Hispanic or Latino:	1,171	94%	1,112	92%	(5%)	121,412	90%	117,928	86.4%	(3%)
Population of one race:	1,133	90%	1,023	85%	(10%)	115,866	86%	107,521	78.8%	(7%)
White alone	1,064	93.9%	945	78%	(11%)	103,958	89.7%	93,316	86.8%	(10%)
Black or African American alone	5	0.4%	5	0.4%	0.0%	1,393	1.2%	1,729	1.6%	24%
American Indian and Alaska Native alone	46	4.1%	53	4%	15%	6,961	6.0%	7,454	6.9%	7%
Asian alone	13	1.1%	10	0.8%	(23%)	2,854	2.5%	3,495	3.3%	23%
Native Hawaiian and Other Pacific Islander alone	2	0.2%	2	0.2%	0%	332	0.3%	436	0.4%	31%
Some Other Race alone	3	0.3%	8	0.7%	167%	368	0.3%	1091	1.0%	197%
Population of two races:	35	3%	83	7%	137%	5,142	4%	9,618	7.0%	87%
White; Black or African American	8	22.9%	10	0.8%	25%	559	10.9%	963	10.0%	72%
White; American Indian and Alaska Native	22	62.9%	48	4%	118%	3,140	61.1%	4,857	50.5%	55%
White; Asian	4	11.4%	4	0.3%	0%	931	18.1%	1,376	14.3%	48%
White; Native Hawaiian and Other Pacific Islander	1	2.9%	3	0.2%	200%	155	3.0%	281	2.9%	81%
White; Some Other Race	0	0.0%	18	2	N/A	109	2.1%	1,750	18.2%	1506%
All Other	3	8.6%	6	0.5%	100%	404	7.9%	789	8.2%	95%
Three or More Races	2	0.2%	6	0.5%	200%	365	0.3%	696	0.5%	91%

Notes: Percentages may not add up to 100 percent due to rounding. Negative growth is shown in parentheses. Source: 2010 Decennial Census Summary File 3, U.S. Census Bureau, 2020 Decennial Census Redistricting Data

3.4 Population by Age Group

The distribution of Blue Lake and Humboldt County's 2010 and 2020 Decennial Census reported population by age group is shown in Table 5-4, and Figure 3 compares Blue Lake's population by age cohorts for 2010 and 2020. There is a clear aging trend in both Blue Lake and Humboldt County between 2010 and 2020, with substantial increases in the 65+ population (Blue Lake from 10.14% to 20.36%, County from 13.17% to 19.14%) and relative stability or growth in the 55–64 cohort. At the same time, younger age groups have generally declined. This decline was particularly notable among ages 15–24 and 25–34 in the City and the County, while children under 5 also declined slightly. Middle-aged cohorts shifted unevenly, with growth in the 35–44 group but declines in 45–54, indicating a population bulge moving upward in age rather than being replaced by younger cohorts.

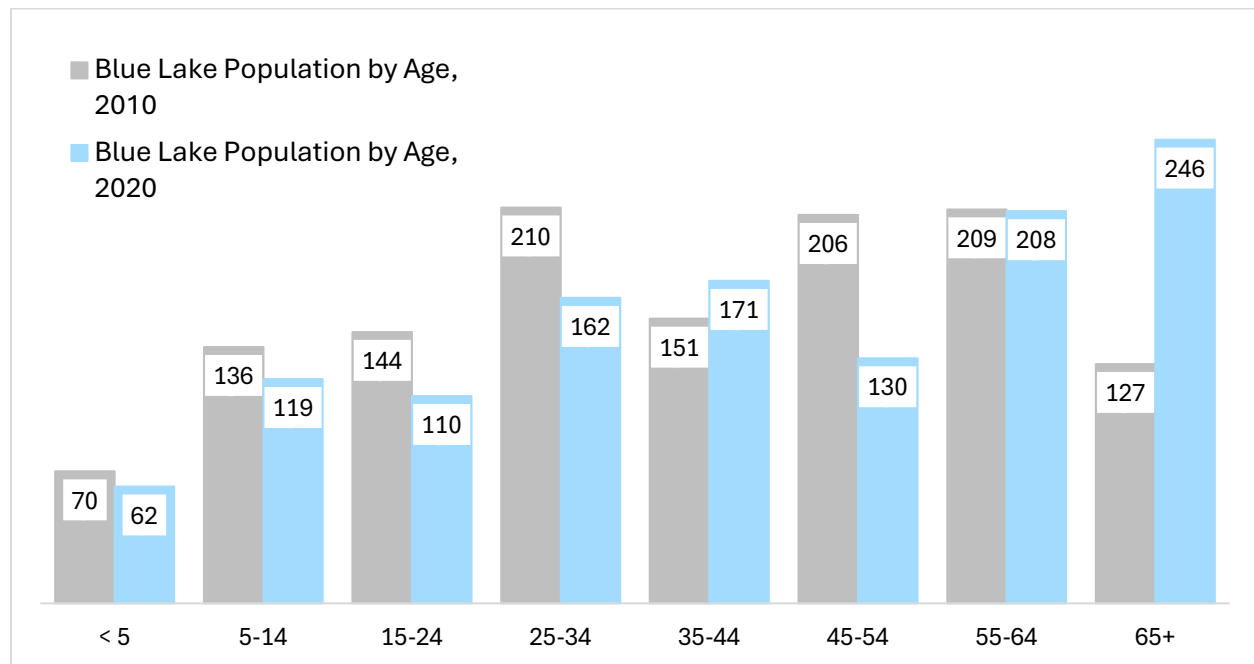
Table 5-4 – Population by Age, 2010 and 2020

Age	Blue Lake				Humboldt County			
	2010	% of Total	2020	% of Total	2010	% of Total	2020	% of Total
< 5	70	5.6%	62	5.1%	7,738	5.7%	6,678	4.9%
5-14	136	10.9%	119	9.9%	14,566	10.8%	15,407	11.3%
15-24	144	11.5%	110	9.1%	21,409	15.9%	18,462	13.5%
25-34	210	16.8%	162	13.4%	19,995	14.9%	19,751	14.5%
35-44	151	12.1%	171	14.2%	15,068	11.2%	18,455	13.5%
45-54	206	16.4%	130	10.8%	18,749	13.9%	14,227	10.4%
55-64	209	16.7%	208	17.2%	19,373	14.4%	17,361	12.7%
65+	127	10.1%	246	20.4%	17,725	13.2%	26,122	19.1%
Total	1,253	100.0%	1,208	100.0%	134,623	100.0%	136,463	100.0%

Note: Percentages may not add up to 100 percent due to rounding. Source: Source: 2010 Decennial Census Summary File 3, U.S. Census Bureau, 2020 Decennial Census Summary File 1.

Both Blue Lake and Humboldt County experienced nearly identical age-cohort shifts from 2010 to 2020, indicating a strong, consistent regional demographic pattern. Most younger and middle-age groups declined, with particularly sharp decreases among ages 15–24 (-23.61%), 25–34 (-22.86%), and 45–54 (-36.89%), while children under 5 and ages 5–14 also generally declined. In contrast, the 65+ population increased dramatically (+93.70%), and the 35–44 cohort grew modestly (+13.25%), reinforcing a clear trend of population aging and a shrinking younger workforce base.

Figure 3 – Blue Lake's Population by Age, 2010 and 2020



3.5 Labor Force and Unemployment

The most recent labor force data for the city was provided by the U.S. Census American Community Survey. Labor force is the sum of employment and unemployment, excluding people in the armed forces. Table 5-5 shows that in 2024 approximately 10% of Blue Lake residents were unemployed, a rate that is comparable to the City of Arcata and Humboldt County, but is a higher rate than the City of Ferndale and the State of California.

Table 5-5 – Labor Force of Blue Lake, Arcata, Ferndale, Humboldt County, and California 2024

	City of Blue Lake	City of Arcata	City of Ferndale	Humboldt County	California
Civilian Labor Force	471	10,541	691	63,659	20,068,466
Employed	424	9,287	649	57,918	18,742,898
Unemployed	47	1,254	42	5,741	1,325,568
Unemployment Rate	10.0%	11.9%	6.1%	9.0%	6.6%

Source: 2024 ACS 5-Year Estimates Data Profiles, U.S. Census Bureau, Table DPO3

Table 5-6 shows the 2024 American Community Survey's employment by industry for the City of Blue Lake. This data shows the largest employment categories to be educational services, and health care and social assistance, employing nearly 23% of Blue Lake's labor force in 2024. The professional, scientific, and management, and administrative and waste

management services and public administration industries together employ about 32% of Blue Lake’s labor force according to the data.

Table 5-6 – 2024 Employment by Industry, Blue Lake

	Estimate	Percent
Total Civilian employed population 16 years and over	424	100%
Agriculture, forestry, fishing and hunting, and mining	30	7.1%
Construction	16	3.8%
Manufacturing	28	6.6%
Wholesale trade	6	1.4%
Retail trade	12	2.8%
Transportation and warehousing, and utilities	0	0.0%
Information	0	0.0%
Finance and insurance, and real estate and rental and leasing	37	8.7%
Professional, scientific, and management, and administrative and waste management services	68	16.0%
Educational services, and health care and social assistance	96	22.6%
Arts, entertainment, and recreation, and accommodation and food services	37	8.7%
Other services, except public administration	26	6.1%
Public administration	68	16.0%

Source: American Community Survey, Table DPO3, 2024

3.6 Largest Employers

The largest employers in Humboldt County are listed in Table 5-7; however, three major regional employers are not listed in the table:

- Cal Poly Humboldt, located in Arcata. According to Institutional Research, Analytics, and Report (IRAR), in 2024, Cal Poly Humboldt had about 2,831 employees¹ of which 330 full-time equivalent faculty. Cal Poly also employs scores of individuals as part-time faculty and support staff.
- Mad River Community Hospital, located in Arcata. According to their LinkedIn profile (accessed June 17, 2026), they have 501-1,000 employees.
- College of the Redwoods, located in the unincorporated area south of Eureka and north of Fortuna, has approximately 440 employees.²

In addition to the Cal Poly Humboldt and Mad River Community Hospital, the other major employers in Humboldt County are Providence St. Joseph Hospital, St. Joseph Hospital Administration, and the Humboldt County Department of Health and Human Services,

¹ Source for the 2,831 employees is <https://rocketreach.co/cal-poly-humboldt-profile>, accessed July 7, 2026.

² <https://www.zippia.com/college-of-the-redwoods-careers-1581524/demographics/>, accessed July 7, 2026.

according to the California Economic Development Department’s Labor Market Information.

Table 5-7 – Major Employers, Humboldt County 2026

Employer Name	Location	Industry	Employer Size Class
County Humboldt Dept Health & Human Services*	Eureka	Government Offices-County	1,000-4,999
Providence St Joseph Hosp Erk	Eureka	Hospitals	1,000-4,999
St Joseph Hospital-Admin	Eureka	Physicians & Surgeons	1,000-4,999
Sun Valley Floral Farms**	Arcata	Florists-Supplies-Manufacturers	500-999
Bettendorf Trucking	Arcata	Trucking	250-499
Blue Lake Casino & Hotel	Blue Lake	Casinos	250-499
Columbia Bank	Eureka	Banks	250-499
Eureka, City of	Eureka	City Government-Executive Offices	250-499
Green Diamond Resource Co	Korbel	Foresters-Consulting	250-499
Humboldt County Social Svc	Eureka	Government Offices-County	250-499
Newmarket International Inc	Eureka	Hospitality Training	250-499
Arcata Forest Products	Arcata	Lumber-Wholesale	100-249
Calfire	Fortuna	Fire Departments	100-249
Costco Wholesale	Eureka	Wholesale Clubs	100-249
Danco Group	Arcata	Construction Companies	100-249
Eureka High School	Eureka	Schools	100-249
Humboldt County Dept-Health	Eureka	Clinics	100-249
Humboldt County Mental Health	Eureka	Hospitals	100-249
Humboldt County Sheriff Dept	Eureka	Emergency Calls	100-249
North Coast Co-Op	Arcata	Grocers-Wholesale	100-249
Redwood Memorial Hospital	Fortuna	Hospitals	100-249
Schmidbauer Lumber Inc	Eureka	Logging (mfrs)	100-249
Target	Eureka	Department Stores	100-249
United States Postal Svc	Eureka	Post Offices	100-249
Winco Foods	Eureka	Grocers-Retail	100-249

* This department is abbreviated as “County Humboldt Dept Health HMN” in the data set.

** In 2024, Sun Valley Floral Farms closed.

Source: California Economic Development Department, Labor Market Information, Humboldt County, accessed June 17, 2026, “This list of major employers was extracted from the America's Labor Market Information System (ALMIS) Employer Database, 2026 1st Edition.”

The City surveyed job postings on Indeed.com, Glassdoor.com, Craigslist.com, etc. in April 2026 to develop an estimate of the pay range for local positions, including some entry-level positions. The results of the survey are presented in Table 5-8.

Table 5-8 – April 2026 Salary Survey

Category	Position	Gross Annual Salary
Education	Teacher	\$73,562
Education	6-8th Grade Multiple Subject Teacher	\$61,000
Construction	Metal Fabricator	\$57,803
Construction	Concrete Finisher	\$53,435
Forestry	Forester 1	\$53,040
Food and Beverage	Brewer/General Laborer	\$51,979
Management	Property Manager	\$51,887
Transportation	Class A Driver	\$51,480
Forestry	Entry Level Floater	\$47,237
Retail	Retail Sales Representative	\$46,800
Maintenance	Maintenance Technician	\$44,720
Maintenance	General Laborer 2	\$42,245
Education	Secretary & Nutrition Clerk	\$41,600
Maintenance	Laborer	\$41,600
Forestry	Seasonal Forestry Technician	\$41,600
Transportation	Delivery Driver/Yard Support	\$41,600
Hospitality	Security Officer I	\$40,830
Medical	Housekeeper	\$40,102
Hospitality	Receptionist	\$39,520
Food and Beverage	Dishwasher	\$39,000
Hospitality	Housekeeper	\$37,440
Retail	Team Member	\$37,045
Maintenance	Maintenance Technician	\$35,360
Food and Beverage	Taproom Bartender	\$34,320
Education	Classroom Instructional Aide	\$33,280
Education	Facilities Custodian	\$33,280

Source: Planwest Partners, Inc., April 2026.

The average and median gross annual salaries for the positions listed in Table 5-8 are \$44,935 and \$42,567, respectively.

3.7 Commuting and Transportation Costs

Related to local and regional employment is the commute distance. Commute distance is an important factor in housing availability and affordability and is also an indicator of jobs/housing balance. Communities with extended commute distances generally have a poor jobs/housing balance, while those with short average commutes tend to have a strong jobs/housing balance. The burden of the additional costs associated with extended

commuting disproportionately affects lower-income households who must spend a larger portion of their overall income on fuel. This in turn affects a household's ability to occupy decent housing without being overburdened by cost.

When Blue Lake labor force estimates in Table 5-5 are applied to the travel time estimates in Table 5-9, about 34% and 37% of Blue Lake residents who are in the work force and employed travel 15 to 30 minutes from home to work. This indicates that many of the jobs are within 20 miles of the City and there are available jobs within relatively close distance to the employees' places of residence. The commute time data also indicates that Blue Lake residents are likely to commute to Arcata and McKinleyville because both are approximately a 15-minute drive (one way) from Blue Lake. As discussed above, Cal Poly Humboldt, Mad River Community Hospital, and other major employers are located in Arcata, and the Humboldt Department of Health and Human Services operates a branch in McKinleyville (an unincorporated Census Designated Place).

Table 5-9 – Travel Time to Work

Travel Time to Work	Number	%
Less than 15 minutes	105	36%
15 to 29 minutes	158	55%
30 to 59 minutes	26	9%
60 or more minutes	0	0%
Total	289	100%

Source: ACS, 2024, Table B8303

ACS Table DPO3, a separate table from B8303, includes the following data points on Blue Lake residents commute to work:

Table 5-10 – Commuting to Work

Means of Travel	Estimate
Car, truck, or van -- drove alone	234
Car, truck, or van -- carpooled	14
Public transportation	0
Walked	29
Other means	12
Worked from home	91
Mean travel time to work: 14 minutes	

Source: ACS, 2024, Table DPO3

Humboldt County is a large rural county and Blue Lake is a relatively low density city, and there are limited transit options beyond those provided by private vehicles and the Humboldt Transit Authority (HTA). HTA is Humboldt County's sole public transit operator. HTA buses are ADA compliant, and HTA provides Dial-A-Ride services. The City of Blue Lake

does not operate a separate intercity bus service. HTA operates five routes, with an intracity bus service that services Arcata/Blue Lake/Willow Creek (named the Willow Creek route). The Willow Creek route largely follows the State Highway 299 corridor. HTA's weekday westbound service (Blue Lake to Arcata) stops in Blue Lake five times, with the weekday eastbound service stopping in Blue Lake four times. HTA only provide services on Saturdays for the entirety of their service area. The Willow Creek route's eastbound and westbound weekend runs stop in Blue Lake three times. For the Willow Creek route weekday and weekend service, HTA serves two bus stops in Blue Lake. One bus stop is near City Hall and the second stop is near the City's western boundary and is in close proximity to the Blue Lake Rancheria Casino, another major local employer.

While HTA provides transit service to Blue Lake, meeting the farebox ratios to increase service is challenging given Blue Lake's relatively low residential density. As such, and that Humboldt County is rural, Blue Lake has high transportation costs according to HUD's Low Transportation Cost Index, along with much of Humboldt County (<https://hudgis-hud.opendata.arcgis.com/datasets/HUD::low-transportation-cost-index/about>, accessed June 18 2026).³ The Census tract that Blue Lake is a part of has an index score of 9.⁴ This means transportation costs for low income Blue Lake residents is high.

The Humboldt County Association of Governments (HCAOG) serves as Humboldt County's designated Regional Transportation Planning Agency (RTPA) and is responsible for administering Transportation Development Act (TDA) funds throughout the region. As part of its annual TDA responsibilities, HCAOG conducts an Unmet Transit Needs (UTN) assessment to evaluate existing transit service, demographic trends, public input, and opportunities for service improvements. During the 2025/26 Unmet Transit Needs process, HCAOG identified several regional transit service requests that were determined to be reasonable to meet but could not be funded due to financial constraints. The request most applicable to Blue Lake was for expanded transit service within Blue Lake. Previous transit improvements that have been implemented include the addition of Saturday service to Blue Lake in October 2019 through the Willow Creek route. The UTN also highlighted that City of Blue Lake had some of the highest proportions of Transit Dependent populations in Humboldt County with 38.4% of residents age 65 or older and 26.5% of residents with a disability. Although the HCAOG Board's FY 2026–27 Report of Findings ultimately determined that there are no unmet transit needs that are reasonable to meet under the Transportation Development Act criteria, the City will continue to coordinate with HCAOG and HTA to pursue future service enhancements that improve mobility, support older adults

³ HUD's transportation cost index "estimates of transportation expenses for a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region" at the Census tract level.

⁴ The lower the index score, the higher the transportation costs. Index scores are affected by the availability of public transit, the density of housing, services, and jobs in a community.

and persons with disabilities, and provide transportation options for existing and future residents.

There are ongoing and in-progress regional investments for the development of a regional pedestrian and bicycle infrastructure system that will connect cities of Arcata and Blue Lake: the Annie & Mary Rail Trail. Upon completion, the Annie & Mary Rail Trail will generally follow the Mad River and former Arcata & Mad River Railroad Company corridor. The first of five segments has been constructed in the City of Blue Lake and another segment in Arcata has secured funds through construction. Community members have long been working together toward this vision of a pedestrian, bicycle and equestrian trail system connecting the communities. Humboldt County has been working with local non-profit “The Friends of the Annie and Mary Trail” for close to 10 years. Other partners in this endeavor include the City of Blue Lake, the City of Arcata, the Humboldt County Association of Governments, Blue Lake Rancheria and the Redwood Community Action Agency (Caltrans, <https://dot.ca.gov/caltrans-near-me/district-1/d1-projects/d1-annie-mary-trail>, accessed June 18, 2026). While completion of the trail that will connect Blue Lake and Arcata is not imminent, long term completion will offer a sustainable and VMT-reducing commute alternative for residents.

3.7.2 Regional transportation services:

There is no rail service available in Humboldt County. The County of Humboldt operates the commercial airport in McKinleyville. HTA operates the North State Express Route 101 that connects southbound riders to the City Santa Rosa via the Mendocino Transit Authority at the City Ukiah. Service to Crescent City and northward to Smith River is offered by HTA’s partnership with Redwood Coast Transit. Amtrak operates intracity bus service with designated stops in Arcata and Eureka, and terminates at Amtrak’s Martinez train station.

3.8 Fastest Growing Occupations

The region’s fastest growing occupations are listed in Table 5-11. This information is available only on a regional basis. The region consist of Del Norte, Humboldt, Lake, and Mendocino Counties. Nonetheless, the information is relevant as Blue Lake residents work both inside and outside of the City. It is anticipated that the fastest growing occupation in the region is in the areas of health care and social assistance, education and health services, and arts, entertainment, and recreation.

Table 5-11 – Top 10 Fastest Growing Occupations, 2022-2032

Industry Title (NAICS Code)	Base Year Employment Est. 2022	Projected Year Employment Est. 2032	Numeric Change 2022-2032	Percentage Change 2022-2032
Health Care and Social Assistance (62)	20,530	24,880	4,350	21.20%
Education and Health Services (1025)	21,560	26,030	4,470	20.70%

Industry Title (NAICS Code)	Base Year Employment Est. 2022	Projected Year Employment Est. 2032	Numeric Change 2022-2032	Percentage Change 2022-2032
Arts, Entertainment, and Recreation (71)	900	1,040	140	15.60%
Educational Services (61)	1,030	1,150	120	11.70%
Administrative and Support and Waste Management and Remediation Services (56)	2,620	2,920	300	11.50%
Construction (1012)	4,810	5,260	450	9.40%
Professional and Business Services (1024)	5,530	5,950	420	7.60%
Service-Providing (102)	92,810	98,930	6,120	6.60%
Real Estate and Rental and Leasing (53)	1,310	1,390	80	6.10%

Source: California Employment Development Department Employer Long Term Projections North Coast Region (Del Norte, Humboldt, Lake, and Mendocino Counties)

<https://labormarketinfo.edd.ca.gov/data/employment-projections.html>, accessed May 2026.

4.0 Household Characteristics

4.1 Number of Households and Types

Much of the following reporting and analysis relies on the American Community Survey (ACS). The ACS is the best available source of detailed demographic, economic, housing, and social data for local communities. However, for cities with smaller populations, such as Blue Lake, ACS estimates should be viewed as general indicators rather than precise counts. Even with this limitation, the ACS remains the most reliable and widely accepted dataset for understanding community characteristics and comparing trends.

The American Community Survey of 2019 and 2024 data for household types including group quarters are presented in Table 5-12. The data indicate changes in family and non-family households in Blue Lake from 2019 to 2024. A family household consists of a householder living in the home with one or more individuals who are related to the householder by birth, marriage, or adoption. A non-family household consists of the householder living alone, or the home is occupied exclusively by unrelated people. People who are not living in housing units and are living in group quarters of which there are two types: institutional and non-institutional. Correctional facilities and nursing homes are examples of institutional group quarters. College dormitories, military barracks, group homes, and shelters are examples of non-institutional group quarters.

According to ACS data, between 2019 and 2024, the total number of households (as defined above) increased from 428 to 575; however, the average household size in 2024 (1.71 persons) was smaller than 2019 households (2.11 persons), a decline of approximately 19%.

The shift in household size (from 2.11 to 1.71 persons) indicates that change is being driven by the formation of smaller households rather than population expansion. The number of family households (as defined above) increased modestly, but declined as a share of total households from 55.8% to 47.5%, while the number of non-family households more than doubled, and now comprise the majority at 53% of total Blue Lake households. The number of married-couple households with children increased, but decreased as percentage of the overall share. Male-headed households without a spouse nearly doubled (up 89.5%), particularly those with children (up 108.3%). Meanwhile, female-headed households remained relatively stable but saw a decline in those with children (down to zero).⁵ The data indicates a pattern of smaller and non-family household types, for the reporting periods.

The California Department of Finance reports household size data, however, their data does not differentiate between family and non-family households. Like the ACS data, the DOF data shows a similar decline in Blue Lake's household size: the number of the persons per was 2.25 in 2019 and was 2.15 persons per household in 2024.⁶

Table 5-12 – Blue Lake Household Types and Changes, 2019 and 2024

Household Type	2019		2024		% Change From 2019 to 2024
	Number	%	Number	%	
Total Households	428	100.0%	575	100.0%	34.3%
Average Household Size	2.11		1.71		(19.0%)
Family Households (families)	239	55.8%	273	47.5%	14.2%
Average Family Size	2.52 persons		2.18 persons		(13.5%)
Married-Couple Families	180	42.1%	193	33.6%	7.2%
With Children	25	5.8%	35	6.1%	40.0%
Female Householder, no spouse	40	9.4%	44	7.7%	10.0%
With Children	5	1.2%	0	0.0%	(100.0%)
Male Householder, no spouse	19	4.4%	36	6.3%	89.5%
With Children	12	2.8%	25	4.4%	108.3%
Non-Family Households	189	44.2%	302	52.5%	59.8%
Group Quarters Population (Non-Household Population)					
City of Blue Lake	0		0		N/A
Humboldt County	4,140		4,123		(0.4%)

Negative values are shown in parentheses.

Sources: American Community Survey for 2019 and 2024, Tables S1101, S2501, B11003, and B26001.

⁵ On an anecdotal basis, the City is aware of several Blue Lake female-headed households with children at home as these individuals are/were City employees.

⁶ California Department of Finance Demographic Research Unit, Report E-5, released May 1, 2026, accessed July 14, 2026.

4.2 Household Income, Income Distribution and Poverty, including Segregation and Integration Patterns and Trends

Table 5-13 presents the distribution of income for households in Blue Lake in 2015, 2020, and 2024 as well as Humboldt County in 2024 according to American Community Survey data. Accounting for inflation, the household median income for Blue Lake decreased significantly by approximately \$21,791 between 2015 and 2024 but is only lower than the County median income by \$4,530. Figure 5 illustrates the 2024 distribution of income (as a percentage) of Blue Lake vs. Humboldt County. The key trends of Blue Lake's income distribution are

- Middle-income households (\$50,000–\$74,999) remained the largest group across all three years, increasing from 95 households in 2015 to 107 in 2020, then slightly declining to 106 in 2024.
- Higher-income households (\$150,000 or greater) grew substantially between 2015 and 2024, increasing from 28 households in 2015 to 59 households in 2024, although those earning between \$100,000 and \$149,999 decreased from 81 to 51.
- \$75,000–\$99,999 was relatively stable, ending at 85 in 2024 compared with 86 in 2015.
- The \$35,000–\$49,999 group experienced the strongest growth, rising from 29 households in 2015 to 67 in 2020 and 104 in 2024.
- Lower-income households showed mixed changes:
 - Households earning less than \$15,000 climbed from 67 in 2015 to 105 in 2024.
 - The \$15,000–\$24,999 category increased from 47 in 2015 to 56 in 2020, then dropped sharply to 18 in 2024.
 - The \$25,000–\$34,999 bracket declined markedly, from 94 households in 2015 to 47 in both 2020 and 2024.

Overall, Blue Lake's income distribution shifted over the decade, with notable growth in both higher-income households (\$150,000+) and the \$35,000–\$49,999 income bracket. Meanwhile, some traditional middle-income categories, particularly \$25,000–\$34,999, contracted significantly. The \$50,000–\$74,999 bracket remained the dominant income range throughout the period.

The County's 2024 median income was greater than Blue Lake's, \$58,124 and \$53,594, respectively.

Table 5-13 – Income Distribution, 2015-2024

Annual Income	Blue Lake						Humboldt County	
	2015		2020		2024		2024	
	# of HHs†	% of Total	# of HHs	% of Total	# of HHs	% of Total	# of HHs	% of Total
Less than \$15,000	67	12.7%	63	13.8%	105	18.3%	6,056	10.9%
\$15,000 to \$24,999	47	8.9%	56	12.3%	18	3.1%	6,389	11.5%

Annual Income	Blue Lake						Humboldt County	
	2015		2020		2024		2024	
	# of HHs†	% of Total	# of HHs	% of Total	# of HHs	% of Total	# of HHs	% of Total
\$25,000 to \$34,999	94	17.8%	47	10.3%	47	8.2%	5,389	9.7%
\$35,000 to \$49,999	29	5.5%	67	14.7%	104	18.1%	5,945	10.7%
\$50,000 to \$74,999	95	18.0%	107	23.5%	106	18.4%	11,112	20.0%
\$75,000 to \$99,999	86	16.3%	40	8.8%	85	14.8%	5,778	10.4%
\$100,000 to \$149,999	81	15.4%	25	5.5%	51	8.9%	6,278	11.3%
\$150,000 or more	28	5.3%	51	11.2%	59	10.3%	8,667	15.6%
Total	527	99.9%	456	100.1%	575	100.1%	54,120	99.9%
Median Income	\$56,991		\$49,479		\$53,594		\$58,124	
Median Income in 2024 Dollars*	\$75,385		\$59,937					

Source: 2015, 2020, and 2024 ACS data Table S1901. Percentages may not add up to 100 percent due to rounding.

† “HH” means “households”

* Estimates per calculation engine on <https://www.in2013dollars.com>.

As shown in Figure 5, Blue Lake’s 2024 income distribution generally follows a similar pattern to Humboldt County but with more concentration at the lower end of the spectrum. Blue Lake has a substantially higher share of households in the lowest income category (under \$15,000), at 18.3% compared to 10.9% countywide, indicating a greater concentration of very low-income households. The City also shows strong representation in the \$35,000 to \$49,999 and \$50,000 to \$74,999 ranges, though it has noticeably fewer households in the \$15,000 to \$34,999 and the greater than \$150,000 brackets relative to the County, suggesting a thinner lower-middle and upper-middle income distribution.

Figure 4 – Blue Lake Household Income Distributions

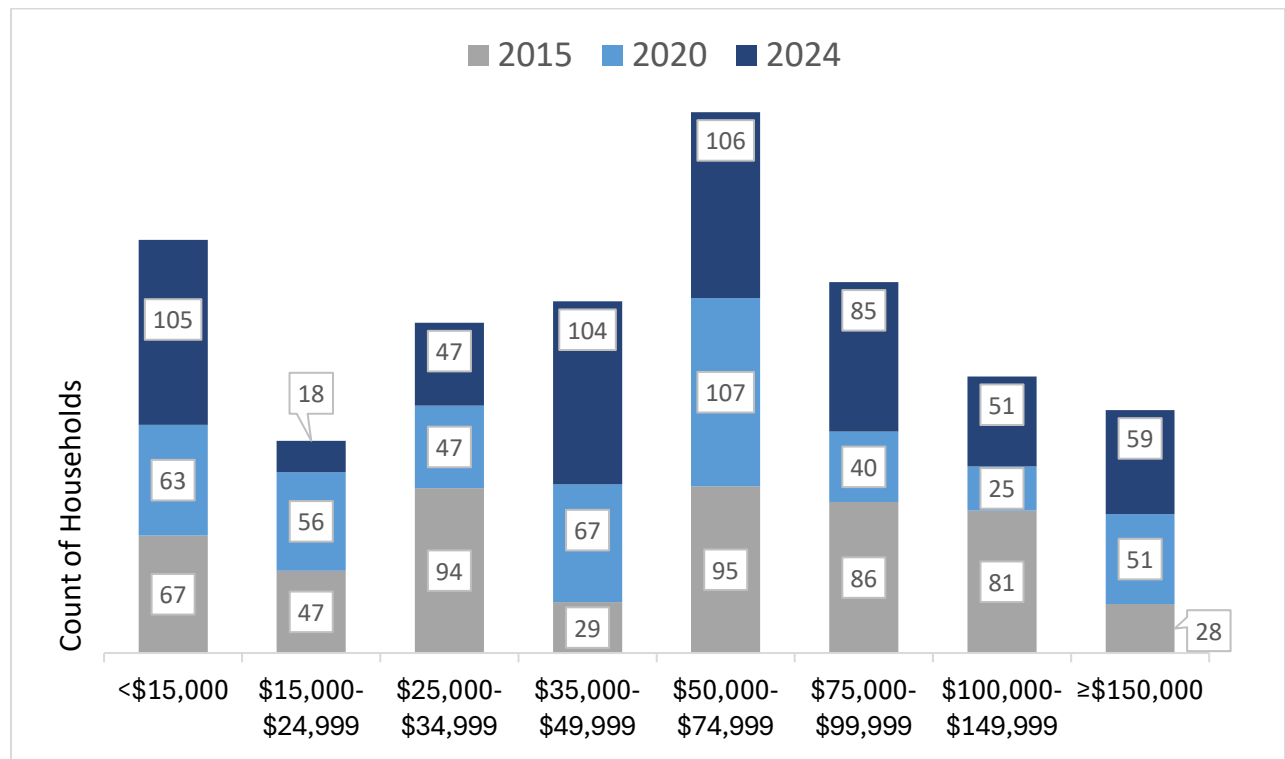


Figure 5 – Blue Lake and Humboldt County 2024 Distribution of Income (as a percentage)

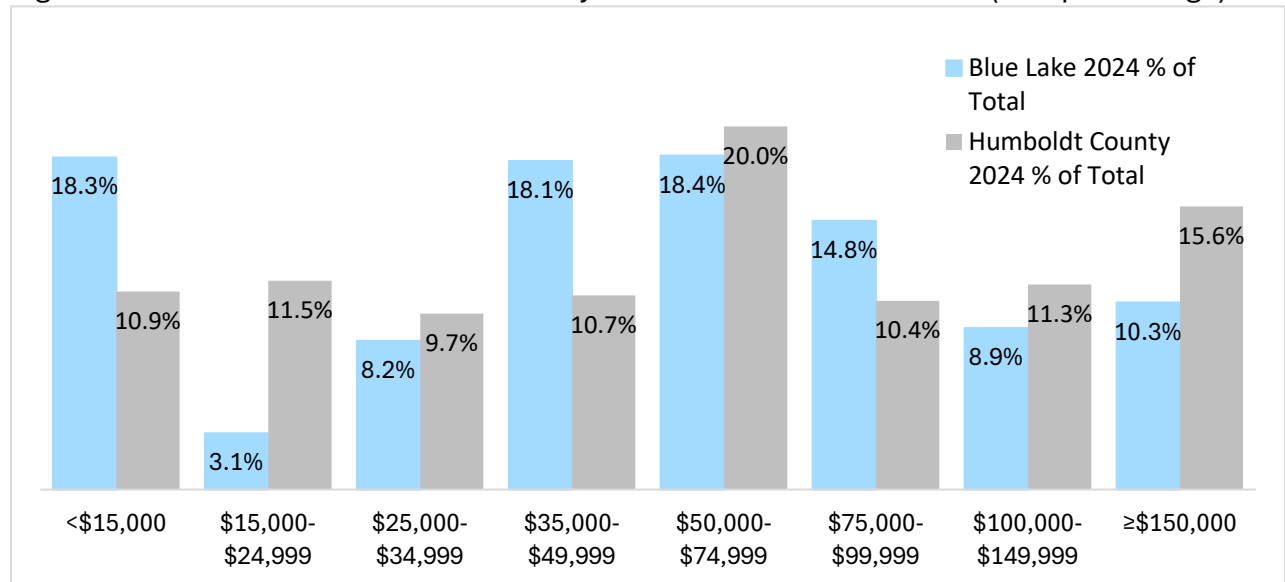


Table 5-14 illustrates the number of households in Blue Lake in each income range based on the Comprehensive Housing Affordability Strategy (CHAS), published by HUD on December 23, 2025. The CHAS is based on ACS 5-year estimates, with the latest CHAS using 2018-2022 ACS. The Department of Housing and Urban Development (HUD) receives custom tabulations of American Community Survey (ACS) data from the U.S. Census

Bureau. These data, known as the "CHAS" data (Comprehensive Housing Affordability Strategy), demonstrate the extent of housing problems and housing needs, particularly for low income households. The income ranges presented in Table 5-14 are calculated using HUD's 2022 income limits to better illustrate the gross household income levels. This is estimated by the number of households that have certain housing problems and have income low enough to qualify for HUD's programs (primarily 30%, 50%, and 80% of median income). This data is oriented towards addressing housing needs for lower income households.

Table 5-14 – Household Income Distribution, 2018-2022 CHAS for Blue Lake

Income Limit Range for 2022*	Income	# of Owner HH	% of Owner HH	# of Renter HH	% of Renter HH	# of Total HH	% of Total
Extremely Low Income ≤ 30% HAMFI**	Less than \$23,910	0	0.00%	85	41.7%	85	18.9%
Very Low Income >30% to ≤50% HAMFI**	\$23,910-\$39,850	35	14.3%	4	2.0%	39	8.7%
Low Income >50% to ≤80% HAMFI**	\$39,851-\$63,760	80	32.7%	20	9.8%	100	22.3%
Low- & Middle Income >80% to ≤100% HAMFI†	\$63,761-\$79,700	10	4.1%	0	0.00%	10	2.2%
Upper Income >100% HAMFI ††	\$79,701 and greater	120	49.0%	95	46.6%	215	47.9%
Total Households		245	100.00%	204	100.00%	449	100.00%

Note: Values and percentages may not add up due to rounding.

*Income limits for a four-person household. The 2022 median family income for a household of four in Humboldt County was \$79,700

** “HAMFI” means “HUD Adjustment Median Family Income”. Per HUD’s methodology, adjustments to the calculated income limit may be applied resulting in income limits that may be different than the calculated value. For more info, visit <https://www.huduser.gov/portal/datasets/il.html#year2022>

† “HH” means “households”

†† Category labels per CHAS Affordability Analysis, Paul Joice, May 20, 2013, https://www.huduser.gov/portal/publications/pdf/CHAS_affordability_Analysis.pdf

There is a highly polarized income distribution by tenure in Blue Lake, with clear differences between owner and renter households. Nearly half of all households (47.9%) are upper income (above 100% HAMFI), and these are split fairly evenly between owners (49.0%) and renters (46.6%), indicating a substantial presence of higher-income renters. In contrast, extremely low-income households ($\leq 30\%$ HAMFI) make up 18.9% of all households but are entirely renters, comprising 41.7% of renter households and no owners. Low-income households (50–80% HAMFI) represent 22.3% of all households and are more commonly owners (32.7%) than renters (9.8%), while very low-income households (30–50% HAMFI) are a smaller share overall (8.7%) and are more prevalent among owners than renters. The low-to moderate-income category (80–100% HAMFI) is minimal at just 2.2% and includes only owners.

Table 5-15 shows the poverty rates by age group in the City as well as for single-parent families. The poverty rate is the percentage of people in a given group that live below the poverty level out of the total population of that given group in the city. Because the American Community Survey has such a high margin of error for very small populations, two years are given as reference.⁷

Table 5-15 – Population Below Poverty Level, Blue Lake

Population	Blue Lake				Humboldt County	
	2023		2024		2024	
	# Below Poverty	%	% Below Poverty	%	# Below Poverty	%
Children < 18 years	40	16.5%	12	8%	4,348	17.7%
Adults (18-64)	192	79.3%	129	85%	16,790	68.3%
Elderly (65+)	10	4.1%	10	7%	3,449	14.0%
Population Below Poverty Level	242	100.0%	151	100.0%	24,587	100.0%
Male-headed Single-Parent Family	20	100.0%	12	100%	829	39.0%
Female-headed Single-Parent Family	0	N/A	0	N/A	593	27.9%
Two Parent Families	0	N/A	0	N/A	702	33.1%
Total Families Below Poverty Line	20	7.3%	12	N/A	2,124	100.0%

⁷ The ACS 2023 poverty threshold for a family of four with two children was \$30,900 and in 2024 was \$32,130. For a family of two with one child at home and the householder is under 65, the 2023 poverty threshold was \$21,002 and \$21,621 in 2024. For a family of two with no children at home and the householder is 65 or older, the 2023 poverty threshold was \$18,418 and \$18,961 in 2024. These values are from the 2023 and 2024 Current Population Survey Annual Social and Economic Supplement (CPS ASEC) at (<https://www.census.gov/data/tables/time-series/demo/income-poverty/historical-poverty-thresholds.html>).

Population	Blue Lake				Humboldt County	
	2023		2024		2024	
	# Below Poverty	%	% Below Poverty	%	# Below Poverty	%

Note: Percentages reflect the proportion of the total segment of the population that is below the poverty level. Source: 2023 and 2024 ACS data, Tables S1701 and B17010.

As shown in Table 5-15, the population who are living below the poverty level in Blue Lake decreased by 91 individuals between 2023 and 2024. The number of children and adults decreased, but the number of elderly who are below the poverty line remained the same. In both Blue Lake and the County, adults ages 18 to 64 comprise the largest share of the population in poverty, followed by children.

Among families, the data collected during the reporting periods indicates that poverty in Blue Lake is concentrated in male-headed single-parent households, which account for all reported families below the poverty line in 2024 (although the small sample size and the issue of ACS accuracy for small cities limits broader interpretation). Female-headed and two-parent families are not represented in the Blue Lake poverty data for these reporting periods. However, the City is aware at least anecdotally there are female-headed single parents in Blue Lake as these individuals are/were City employees. In the case of the County, the data indicate a boarder distribution of family types living below the poverty line.

4.3 Occupancy and Tenure

Table 5-16 and Table 5-17 illustrate the tenure and occupancy of housing in Blue Lake. The most recent tenure information comes from the 2024 Census ACS. According to this information, the majority of housing units are owner occupied (54.3%), which is roughly in line with Humboldt County with 55.2%.

Table 5-16 – Occupied Housing Units by Tenure, 2024

Tenure	Blue Lake		Humboldt County	
	Units	%	Units	%
Owner Occupied	312	54.3%	30,663	55.2%
Renter Occupied	263	45.7%	24,895	44.8%
Total Occupied Housing Units	575	100.0%	55,558	100.0%

Source: Source: 2024 ACS 5-Year Estimate Table DP04

Occupancy information is available from the Census Bureau for 2010 and 2020. The US Census considers a housing unit to be vacant if,

“A housing unit is vacant if no one is living in it at the time of the interview, unless its occupants are only temporarily absent. In addition, a vacant unit

may be one which is entirely occupied by persons who have a usual residence elsewhere.” (<https://www.census.gov/housing/hvs/definitions.pdf>, pg. 3, accessed April 27, 2026)

Table 5-17 – Occupancy Status, 2010, 2020

Occupancy	2010		2020	
Total Occupied (Households)	542	94.8%	541	95.1%
Total Vacant	30	5.2%	28	4.9%
Total Housing Units	572	100.0%	569	100.0%

*An occupied housing unit is a household.

Sources: 2010 and 2020 U.S. Census, Table H1.

The number of housing units decreased by three units between 2010 and 2020, although the occupancy rate rose slightly to 95.08% in 2020. Table 5-18 reports American Community Survey vacancy data from 2015-2024, which may shed more light about vacancy. This data shows between 9-32 vacant units that are used seasonally, recreational, or occasional use persons. This category includes units that are not for-rent or for-sale-only but are held for weekends or occasional use throughout the year. Units that are occupied temporarily by persons who usually live elsewhere are also captured in this category. The “seasonal, recreational, or occasional use” category broadly reflects housing units that are second homes.

The “other vacant” category are units that were vacant for other reasons not included in one of the preceding categories. This may include units held vacant for settlement of an estate, held for personal reasons, or held for repairs. At this time the U.S. Census does not have a unique category for housing units that are short term rentals. Based on the existing categories, it appears short term rentals may be categorized in either the “seasonal, recreational, or occasional use” or “other vacant” categories depending on property owner’s use of the property.

The values of zero for the categories “for rent” in 2015 and “for sale only” for 2020, 2022, 2023, and 2024 indicates a tight housing market with little mobility.⁸ This data indicates this condition may have preceded the COVID-19 pandemic. The spike of “for rent, not occupied” housing units in 2020 are likely related to Covid-19 abnormalities. Nonetheless, according to HCD’s Final Regional Housing Need Determination letter, dated July 15, 2025, healthy vacancy rates are 2% owner and 6% renter for non-metropolitan regions such as Humboldt County. According to the same letter, Humboldt County’s owner and renter vacancy rates

⁸ 2024 is the most current year available of ACS data as of April 27, 2026.

at 0.99% and 3.55% respectively, are below the healthy standards, consequently adjustments were applied as part of HCD's housing unit need determination.

Table 5-18 – Vacancy Status, Blue Lake, Multiple Years

Vacant housing units	2015	2020	2022	2023	2024
Total:	80	104	84	65	71
For rent	0	37	27	26	26
Rented, not occupied	0	20	0	0	0
For sale only	10	0	0	0	0
Sold, not occupied	17	9	0	0	0
For seasonal, recreational, or occasional use	32	10	9	10	9
For migrant workers	0	0	0	0	0
Other vacant	21	28	48	29	36

Source: American Community Survey, Table B25004.

4.4 Overpayment for Housing (Cost Burdened)

The State of California publishes annual income limits for each county that are used to determine eligibility for assisted housing programs within that county, including Blue Lake residents. The California Health and Safety Code requires that the State limits for the low, very low, and extremely low income categories will be the same as those in the equivalent levels established by the U.S. Department of Housing and Urban Development (HUD) for its Section 8 program. California's 2026 income limits by household size are shown in Table 5-19.

Table 5-19 – 2026 State Income Limits, Humboldt County

Income Category	Number of Persons in Household							
	1	2	3	4	5	6	7	8
Acutely Low	\$10,200	\$11,650	\$13,100	\$14,550	\$15,700	\$16,900	\$18,050	\$19,200
Extremely Low	\$20,450	\$23,350	\$27,320	\$33,000	\$38,680	\$44,360	\$50,040	\$55,720
Very Low	\$34,000	\$38,850	\$43,700	\$48,550	\$52,450	\$56,350	\$60,250	\$64,100
Low	\$54,400	\$62,200	\$69,950	\$77,700	\$83,950	\$90,150	\$96,350	\$102,600
Median	\$67,950	\$77,700	\$87,400	\$97,100	\$104,850	\$112,650	\$120,400	\$128,150
Moderate	\$81,550	\$93,200	\$104,850	\$116,500	\$125,800	\$135,150	\$144,450	\$153,800

Source: California Department of Housing and Community Development, May 2026.

The above listed income categories, as a percentage of the area median income (AMI), are as follows:

Acutely low income	0-15% of AMI
Extremely low income	15-30% of AMI

Very low income	30-50% of AMI
Lower income	50-80% of AMI
Moderate income	80-120% of AMI

Definitions of housing affordability can vary, but in general a household should pay no more than 30% of its monthly gross income on housing costs. Households that pay more than this are considered “cost-burdened” and households that pay more than 50% are considered “severely cost-burdened.” Measuring the number of people paying more than this percentage helps define a community’s affordability problem. Table 5-20 illustrates the extent of overpayment in Blue Lake. It is noted that Table 5-20 uses 2018-2022 data which encompasses time before and during the COVID-19 pandemic.

There are about 10% more owner households (245) than renter households (205) in Blue Lake. Of those owner households, approximately 10% are overpaying for housing, of which 40% are severely cost burdened. Overpaying owner households are estimated to be lower income, as indicated in Table 5-20. Renter households are also overpaying for housing although at a higher rate: nearly 46% of renter households are paying greater than 30% of their gross income for housing. Of these renter households, almost 47% are severely cost burdened. Also the renter household income ranges of cost burden households spans from ELI to those earning above the HUD Adjustment Median Family Income. Overall, Table 5-20 indicates that Blue Lake renter households are disproportionately cost-burdened.

Table 5-20 – Overpayment for Housing, Ownership and Rental

Housing Income Range	Total Households	Overpayment (> 30% income on housing)		Severe Overpayment (> 50% income on housing)	
		Number	%	Number	%
Owner Households	245	25	10.2%	10	40.0%
Extremely Low Income (≤30% HAMFI)	0	0	N/A	0	N/A
Very Low Income (>30% to ≤50% HAMFI)	35	0	0.00%	0	N/A
Low Income (>50% to ≤80% HAMFI)	80	25	31.3%	10	40.0%
Moderate Income and above (>80% HAMFI)	10	0	0.00%	0	N/A
Household Income >100% HAMFI	120	0	0.00%	0	N/A
Renter Households	205	94	45.9%	44	46.8%
Extremely Low Income (≤30% HAMFI)	85	40	47.1%	40	100.0%
Very Low Income (>30% to ≤50% HAMFI)	4	4	100.0%	4	100.0%

Housing Income Range	Total Households	Overpayment (> 30% income on housing)		Severe Overpayment (> 50% income on housing)	
		Number	%	Number	%
Low Income (>50% to ≤80% HAMFI)	20	20	100.0%	0	0.0%
Moderate Income and above (>80% HAMFI)	0	0	N/A	0	N/A
Household Income >100% HAMFI	95	30	31.6%	0	0.0%
All Households	450	119	26.4%	54	45.4%
Extremely Low Income (≤30% HAMFI)	85	40	47.1%	40	100.0%
Very Low Income (>30% to ≤50% HAMFI)	39	4	10.3%	4	100.0%
Low Income (>50% to ≤80% HAMFI)	100	45	45.0%	10	22.2%
Moderate Income and above (>80% HAMFI)	10	0	0.0%	0	N/A
Household Income >100% HAMFI	215	30	14.0%	0	0.0%

Values and percentages may not add up due to rounding. HAMFI means “HUD Adjustment Median Family Income”. Source: 2018-2022 HUD CHAS Data

Figure 6 and 7 below show the City of Blue Lake appears to experience moderate housing cost burden relative to nearby areas in Humboldt County. Many census tracts surrounding Blue Lake fall within the 20-40% range for both owner and renter housing cost burden, meaning a substantial share of households spend more than 30% of their income on housing costs. Nearby coastal and urbanized areas, including portions of the Eureka and Arcata region, generally exhibit higher renter cost burden rates, with some tracts reaching 40%-60% or greater, reflecting stronger housing market pressures and limited rental affordability. Severe housing cost burden, defined as spending more than 50 percent of household income on housing, is less concentrated in and around Blue Lake than in some other parts of the North Coast, but still affects vulnerable households throughout the region, particularly renters and lower-income residents. Overall, the regional pattern suggests that housing affordability challenges are widespread across Humboldt County, with renter households consistently facing greater financial strain than homeowners, and higher-cost coastal communities exhibiting the greatest levels of housing burden. Housing cost burden is commonly defined by HUD as households spending more than 30% of income on housing, while severe housing cost burden refers to spending more than 50%.

Figure 6 – Overpayment by Homeowners Housing Costs (ACS 2024)

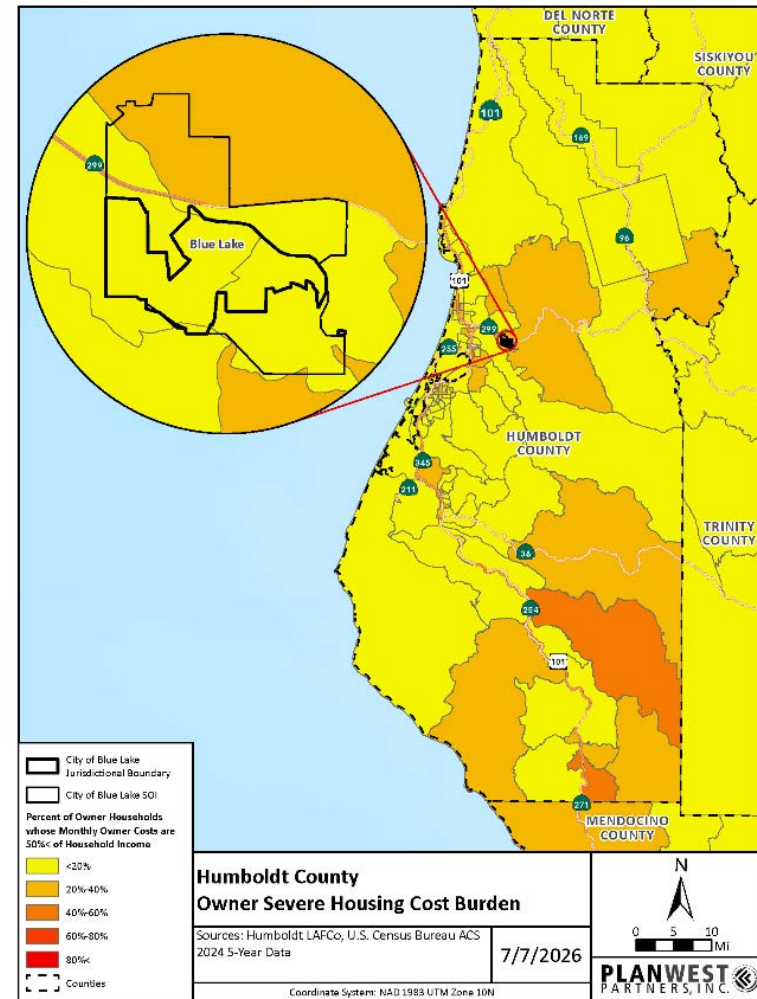
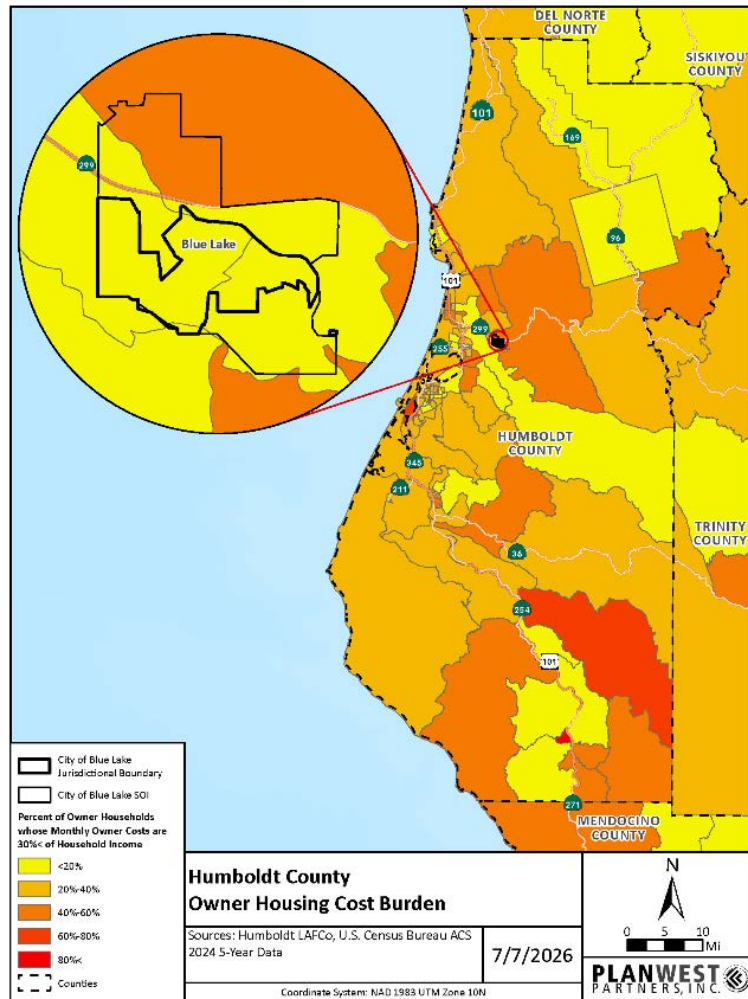
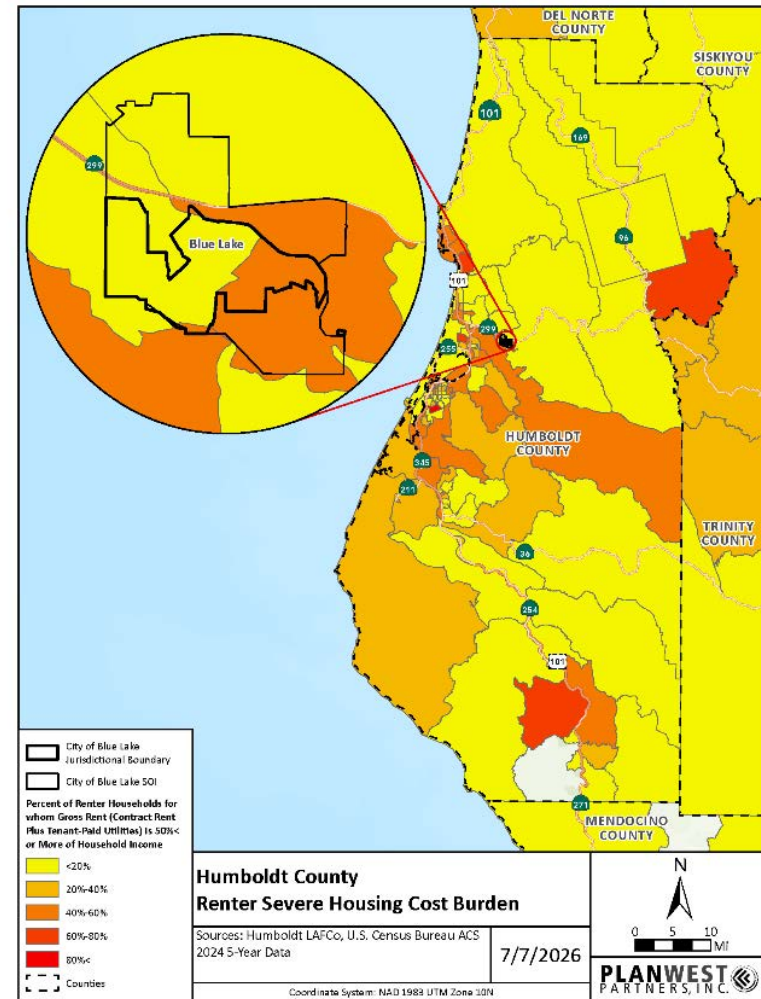
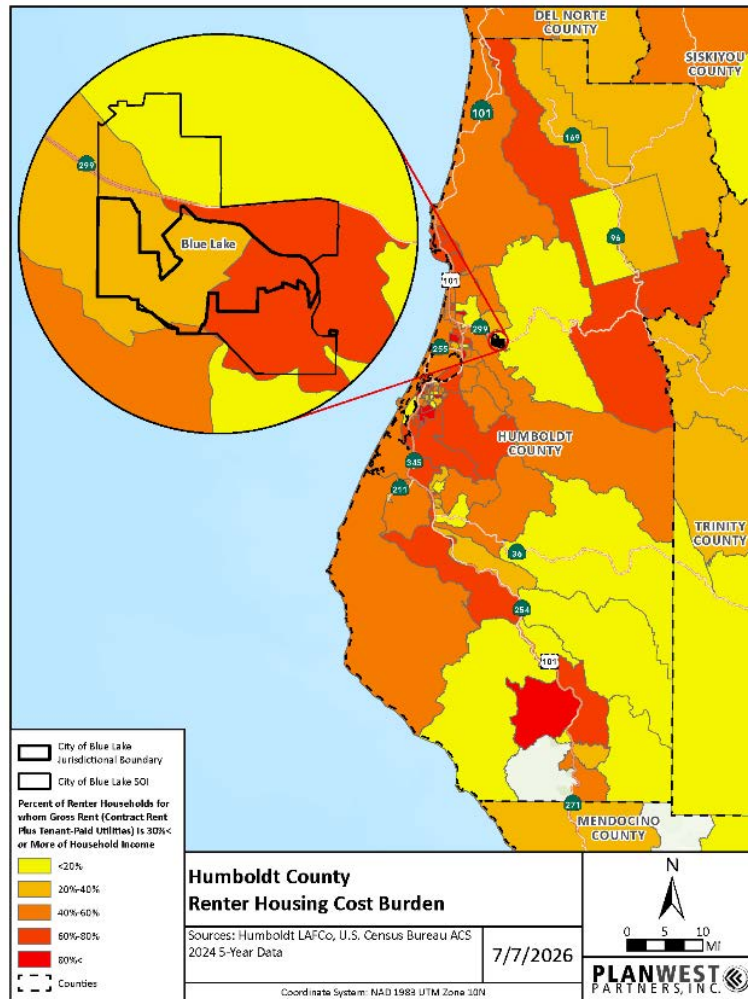


Figure 7 – Overpayment by Renters Housing (ACS 2024)



5.0 Blue Lake's Existing Housing Stock

5.1 Housing Composition

The following data of the composition of Blue Lake's housing stock originate from several different sources that compile data and report on housing counts and composition. All of these sources employ their own methodologies, that may be modified over time, with some being dependent on the City's own reporting. As such, the data should be viewed as general estimates and indicators rather than precise counts. The sources consulted are:

- California Department of Finance (DOF): the Demographic Resource Unit of the DOF compiles into annual public reports. Their housing data is sourced, in part, from annual reporting completed by local jurisdictions, and filed with DOF.
- The U.S. Census via the decennial census and the American Community Survey.
- Blue Lake's Housing Element Annual Progress Reports that the City files with HCD.
- The Blue Lake's City Engineer's tracking for the purpose of monitoring sewer capacity.

Table 5-21 displays the estimated number of each type of housing unit for 2010, 2015, and 2026 as reported to the State Department of Finance by the City. The data shows that most of Blue Lake's existing housing stock, nearly 64%, consists of detached single family residences. The total number of multifamily units and two or more units has remained nearly the same since 2010, and together comprises about 25% of Blue Lake's housing stock. More or less uniformly across all housing types reported in the California Department of Finance's E-5 reports there has been little change in the count of Blue Lake's housing inventory.

Table 5-21 – Housing Unit Types, 2000-2020

	2010		2015		2026	
	Number	Percent	Number	Percent	Number	Percent
Single family						
Detached*	362	63.3%	360	62.9%	365	63.8%
Attached*	11	1.9%	11	1.9%	12	2.1%
Mobile Homes	58	10.1	56	9.8%	53	9.3%
Multifamily						
2-4 units*	108	18.9%	109	19.1%	110	19.2%
5 or more	33	5.8%	33	5.8%	32	5.6%
Total Units	572	100%	569	100%	572	100%

Note: Percentages may not add up to 100 percent due to rounding. Source: California Department of Finance, E-5 report.

***Definitions:**

Single-Detached Unit - a one-unit structure with open space on all four sides. The unit often possesses an attached garage.

Single-Attached Unit - a one-unit structure attached to another unit by a common wall, commonly referred to as a townhouse, half-plex, or row house. The shared wall or walls extend from the foundation to the roof with adjoining units to form a property line. Each unit has individual heating and plumbing systems.

2- 4 Units per Structure - a structure containing two, three, or four units and not classified as a single-unit attached structure. The units in the structure share attic space and heating and plumbing systems.

Chapter 7 of the Housing Element reviews Blue Lake's 6th Cycle RHNA progress using the Annual Progress Reports (APRs) the City has filed with HCD. The APRs show that 10 new housing units were permitted from 2019 to 2025, of which four appear to replace previous units. This yields a net increase of six new units, or 1 unit per year. Of those 10 units, five are known to be ADUs with the remaining units being detached single family units. The housing unit data presented in Table 5-21 generally aligns with, although not identical, the City's 6th Cycle RHNA progress.

The Blue Lake's City Engineer's data tracking indicates that at least 20 residential units have been developed since 2010. This is annual yield of 1.25 dwelling units per year. According to the City Engineer, the housing configurations include 7 new single-family, 8 new multi-family, and 5 ADUs. Replacement units were not tracked for sewer capacity purposes.

The data indicates a general and sustained trend of a low rate of new housing production in Blue Lake across all housing types.

With respect to the number of bedrooms, the 2024 American Community Survey (ACS) is the only publicly available data for estimated number of bedrooms by housing unit. It is

noted, that the ACS data estimates Blue Lake has 646 total housing units, 74 units more than the State of California Department of Finance’s 2026 estimate of 572 housing units reviewed in Table 5-21 above. Given this discrepancy the bedroom estimates presented in Table 5-22 are noted for general patterns. The general pattern is there are a low share of studio (i.e., no bedrooms) and one-bedroom housing units, which are approximately 16% of the units). There is also low share of units with four or more bedrooms (about 12%). Most of the City’s housing units are two to three bedroom units.

Table 5-22 – Estimated Number of Bedrooms

Total housing units	646	%
No bedroom	32	5%
1 bedroom	68	11%
2 bedrooms	189	29%
3 bedrooms	278	43%
4 bedrooms	70	11%
5 or more bedrooms	9	1%

Source: U.S. Census Bureau, American Community Survey, ACS 5-Year Estimates Data Profiles, Table DP04.

5.2 Age of Housing and Rehabilitation Needs

Housing Element law requires an estimate of substandard housing in the community. Determining the percentage of units built prior to 1960 provides an estimate of potential major rehabilitation or replacement need. One can also assume that homes built prior to 1980 may require some form of rehabilitation.

Table 5-23 – Age of Housing, 2024

Year Built	Number	%
Built 2020 or later	0	0.0%
Built 2010 to 2019	3	0.5%
Built 2000 to 2009	32	5.0%
Built 1990 to 1999	48	7.4%
Built 1980 to 1989	106	16.4%
Built 1970 to 1979	78	12.1%
Built 1960 to 1969	47	7.3%
Built 1950 to 1959	76	11.8%
Built 1940 to 1949	38	5.9%
Built 1939 or earlier	218	33.7%
Total	646	100%

Note: Percentages may not add up to 100 percent due to rounding.

Source: U.S. Census Bureau, American Community Survey, ACS 5-Year Estimates Data Profiles, Table DP04.

Table 5-23 indicates that approximately 51% of the units in the City were constructed prior to 1960 of which a majority was constructed in 1939 or earlier; 19.3% of the City's housing stock was constructed between 1960 and 1979, and 29% were constructed between 1980 and 2009. The 332 units built prior to 1960 are now nearly 70 years old, and based upon age alone, may require rehabilitation or replacement depending on the level of maintenance these units have received.

The City conducted a housing conditions survey in 2023 provides a more accurate assessment of the condition of the City's housing stock. The survey is summarized in Table 5-24. The conditions survey was conducted by City staff as a combination of a windshield survey and a pedestrian survey. Template forms were used, and the conditions of various observable exterior components of residences (windows, roofing, siding, etc. were rated.

The survey found that the majority (64%) of the housing stock to be in sound condition, and less than 10% needing minor repair. The survey found that 0.80% of Blue Lake's housing stock as needing substantial repair, and 1.6% as dilapidated, which may require the units to be demolished and replaced, however. Fourteen of the units found to need substantial repair and to be dilapidated are single family types, with one multifamily found to be dilapidated.

Table 5-24 – 2023 Housing Conditions Survey

Housing Type	Sound	Minor	Moderate	Substantial	Dilapidated	Blank	Total
Duplex	3	0	0	0	0	0	3
Multi-Family	12	0	4	0	1	0	17
Single Family	376	50	37	5	9	4	481
Blank	4	0	1	0	0	107	112
Total	395	50	42	5	10	111	613
Percent	64.4%	8.2%	6.9%	0.8%	1.6%	18.1%	100%

Two possible outcomes should the owners of units in need of substantial repair or possibly replacement not intervene and take action to repair and/or replace the 15 units are: 1) the units continuing to be used as housing albeit exposing owners and/or renters to substandard conditions; and 2) the existing units being lost altogether. Either outcome have the potential to adversely impact Blue Lake's supply of habitable housing, which may disproportionately affect low-income households, in particular renter households. Low income households typically have lower housing mobility due to their limited income and resources to exit units with significant condition issues. Chapter 2 noted that some survey respondents mentioned unit condition issues. The conditions that may contribute to low-income households being disproportionately affected are:

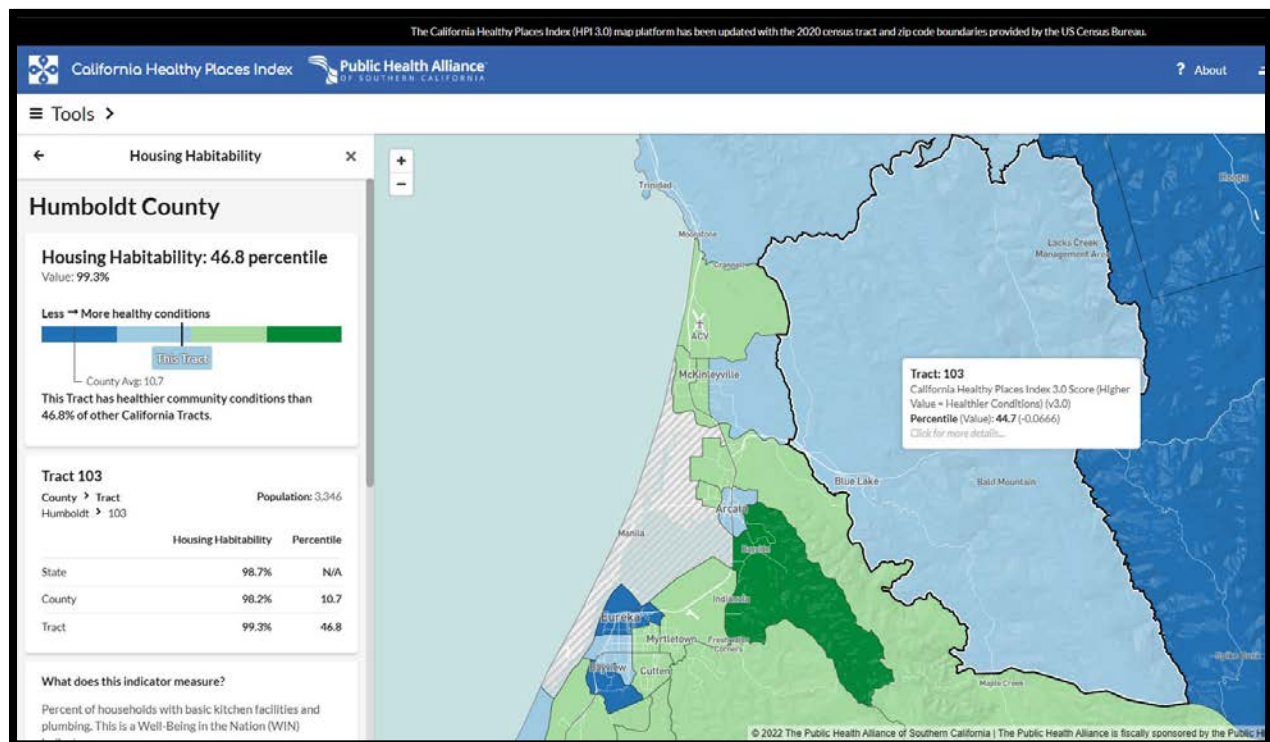
- Blue Lake's historic and current conditions of low vacancy rates
- The general pattern of a low rate of new housing production, especially of multi-family units; and

- That households are overpaying for housing, and that overpayment disproportionately affects renter households as shown in Table 5-20.

Housing habitability, as measured by completeness of kitchen and plumbing facilities, is not reported at the city level. Blue Lake city officials do not have local knowledge of concentrated habitability issues that may be occurring. Therefore, this analysis relies on data reported by California Healthy Place Index which uses HUD's CHAS data at the Census tract level (<https://map.healthypacesindex.org>, accessed June 19, 2026). This tract (Tract 103) contains the entirety of the City and adjacent areas to the north and east, as shown in Figure 8. According to the data, 99.3% of households in this tract have basic kitchen facilities and plumbing. In comparison to Humboldt County and the State, the percentage of Blue Lake households with complete kitchens and complete plumbing is higher:

- Humboldt County: 98.2% of households have basic kitchens and plumbing
- California: 98.7 percent of households having basic kitchen and plumbing.

Figure 8 – Housing Habitability for the Census Tract 103



5.3 Housing Unit Size and Tenure

Table 5-25 illustrates the tenure of the City's housing units by size, measured by the number of bedrooms, as of 2024. Much of the City's housing stock is two to three bedroom units, which comprise approximately 76% of the City's housing stock. Nearly 79% of owner households occupy a 2 to 3 bedroom unit. Because housing units of this size comprise a

majority of the City’s housing stock, a majority of renter households also occupy this size of housing unit. Studios and one-bedroom units comprise the smallest percentage of the City’s housing stock at 11% combined. All of the studios, i.e., no bedroom units, are occupied by renters according to the data. The cost associated with renting these smaller units may be less, thereby the smaller units may be more affordable to lower income households. Four or more bedroom units make up about 12% of Blue Lake’s housing stock, with the majority being occupied by owners. These units are likely to have higher rent prices due to their larger size, and thereby are less affordable to renter households.

Table 5-25 – Housing Unit Size, 2024

Number of Bedrooms	Owner Occupied		Renter Occupied		Total	
	Number	%	Number	%	Number	%
No bedrooms	0	0%	21	8%	21	4%
1 bedroom	10	3%	33	13%	43	7%
2 bedrooms	51	16%	112	43%	163	28%
3 bedrooms	196	63%	82	31%	278	48%
4 or more bedrooms	55	18%	15	6%	70	12%
Total	575	100%	263	100%	575	100%

Note: Percentages may not add up to 100 percent due to rounding Source: U.S. Census Bureau. Tenure by Bedrooms. American Community Survey, ACS 5-Year Estimates Detailed Tables, Table B25042. Retrieved June 19, 2026, from <https://data.census.gov/table/ACSDT5Y2024.B25042?q=B25042+&g=160XX00US0607162>.

Household size by tenure is shown in Table 5-26, and reports between the owner and renter tenures classifications, the size of the households. For households that own their home, most are 2-person households, followed by one-person owner households. The number of both increased between 2020 and 2024. The number of four-person households increased by 19 from 2020 to 2024, also increased but are an smaller share relative to 2-person and 1-person owner household. According to the data there were no 3-person owner households in 2024, although this may be on account of the lack of precision due to the small population size.

Renter households that are comprised of two persons and three persons decreased, while the number of one-person renter households increased. The number of four-person renter households is reported to have changed from 18 households in 2020 to no households in 2024.

Table 5-26 – Household Size by Tenure

HH Size by Occupied Housing Units	2020		2024		% Change
Tenure: Owner Occupied					
1-person	83	31.7%	113	36.2%	36.1%
2-person	123	46.9%	163	52.2%	32.5%
3-person	39	14.95	0	0.0%	(100.0%)
4-person	17	6.55	36	11.5%	111.8%
Total Owner	262	100%	312	100%	19.1%
Tenure: Renter Occupied					
1-person	78	40.2%	167	63.5%	114.1%
2-person	75	38.7%	73	27.8%	(2.7%)
3-person	23	11.9%	23	8.7%	0.0%
4-person	18	9.3%	0	0.0%	-100.0%
Total Renter	194	100%	263	100%	35.6%
Total	456	100%	575	100%	26.1%

“HH” means household. Note: Percentages may not add up to 100 percent due to rounding.

Source: 2020 and 2024, U.S. Census Bureau. "Occupancy Characteristics." American Community Survey, ACS 5-Year Estimates Subject Tables, Table S2501, <https://data.census.gov/table/ACSST5Y2024.S2501?q=S2501&g=160XX00US0607162>. Accessed on 19 Jun 2026.

5.4 Overcrowded Housing

The U.S. Census Bureau defines overcrowding as more than 1.01 persons per room. Severe overcrowding occurs when there are more than 1.5 persons per room. Table 5-27 illustrates the number and percentage of units in the City according to occupants per room. According to the data, no owner occupied housing in Blue Lake are experiencing overcrowding but 2% of renter households are. However, severe overcrowding is not occurring in Blue Lake. In contrast, in Humboldt County, both owner and renter households are experiencing overcrowding and severe overcrowding, with both rates lower for owner occupied housing relative to the renter occupied housing, according to the latest ACS data.

Table 5-27 – Overcrowded Housing, 2024

	Blue Lake				Humboldt County			
	Own. #	Own. %	Rent, #	Rent, %	Own. #	Own. %	Rent #	Rent. %
Occupied Housing Units total:	575	100%	263	100%	31,053	100%	23,869	100%
≤1.00 occupants per room	312	100%	263	75%	412	97.5%	22,505	94.3%

	Blue Lake				Humboldt County			
	Own. #	Own. %	Rent, #	Rent, %	Own. #	Own. %	Rent #	Rent. %
1.01 to 1.50 occupants per room	0	0%	23	2%	352	1.3%	752	3.2%
≥1.51 occupants per room	0	0%	0	0%	53	1.1%	612	2.6%

Note: Percentages may not add up to 100 percent due to rounding. Source: 2020 and 2024, U.S. Census Bureau. "Occupancy Characteristics." American Community Survey, ACS 5-Year Estimates Subject Tables, Table S2501, <https://data.census.gov/table/ACSST5Y2024.S2501?q=S2501&g=160XX00US0607162>. Accessed on 19 Jun 2026.

5.5 Housing Cost

Using HCD's 2026 household income limits (see Table 5-19) for acutely low, extremely low, very low-, low-, median, and moderate-income households in Humboldt County, Table 5-28 provides the maximum costs for housing, monthly rent and purchase price, to be considered affordable) and shows maximum affordable monthly rents and maximum affordable purchase prices for homes. Households earning the 2026 HCD median income for a family of four in the County (\$97,100) could afford to spend up to \$26,220 a year, or \$2,185 a month, on housing without being considered "overpaying."

A household can qualify to purchase a home that is 2.5 to 3.0 times the annual income of that household, depending on the down payment amount, existing debt obligations (such as a car loan, student loan debt), and interest rates. In practice, the interaction of these factors allows some households to qualify for homes priced at more than three times their annual income, with corresponding monthly mortgage payments exceeding 30% of their income, while other households may be limited to purchasing homes no more than two times their annual income. These factors—interest rates, insurance, and taxes—are held constant in the table below in order to estimate the maximum affordable purchase price for households of each income category.

Table 5-28 – Estimated Ability to Pay by Household Size, Humboldt County, 2026

# of Persons	1	2	3	4	5	6
<i>Acutely Low-Income Households at 0 to 15% of 2026 HCD Income Limits</i>						
Annual Gross Income	\$10,200	\$11,650	\$13,100	\$14,550	\$15,700	\$16,900
Monthly Gross Income	\$850	\$971	\$1,092	\$1,213	\$1,308	\$1,408
Max. Monthly Gross Rent (1)	\$255	\$291	\$328	\$364	\$393	\$423
Max. Purchase Price (2)	\$35,295	\$40,312	\$45,329	\$50,347	\$54,326	\$58,478
Monthly Mortgage (2)	\$282	\$322	\$362	\$402	\$434	\$467
<i>Extremely Low-Income Households at 15% to 30% of 2026 HCD Income Limits</i>						
Monthly Gross Income	\$1,704	\$1,946	\$2,277	\$2,750	\$3,223	\$3,697
Max. Monthly Gross Rent (1)	\$511	\$584	\$683	\$825	\$967	\$1,109
Max. Purchase Price (2)	\$67,141	\$84,424	\$108,063	\$141,843	\$175,624	\$209,476
Monthly Mortgage (2)	\$613	\$701	\$820	\$990	\$1,160	\$1,331
<i>Very Low-Income Households at 30% to 50% of 2026 HCD Income Limits</i>						
Monthly Gross Income	\$2,833	\$3,238	\$3,642	\$4,046	\$4,371	\$4,696
Max. Monthly Gross Rent (1)	\$850	\$971	\$1,093	\$1,214	\$1,311	\$1,409
Max. Purchase Price (2)	\$147,771	\$176,695	\$205,548	\$234,401	\$257,611	\$280,822
Monthly Mortgage (2)	\$1,020	\$1,166	\$1,311	\$1,457	\$1,574	\$1,691
<i>Low-Income Households at 50% to 80% of 2026 HCD Income Limits</i>						
Monthly Gross Income	\$4,533	\$5,183	\$5,829	\$6,475	\$6,996	\$7,513
Max. Monthly Gross Rent (1)	\$1,360	\$1,555	\$1,749	\$1,943	\$2,099	\$2,254
Max. Purchase Price (2)	\$269,181	\$315,603	\$361,738	\$407,874	\$445,083	\$482,006
Monthly Mortgage (2)	\$1,632	\$1,866	\$2,098	\$2,331	\$2,519	\$2,705

# of Persons	1	2	3	4	5	6
<i>Median-Income Households per 2026 HCD Income Limits</i>						
Monthly Gross Income	\$5,663	\$6,475	\$7,283	\$8,092	\$8,738	\$9,388
Max. Monthly Gross Rent (1)	\$1,699	\$1,943	\$2,185	\$2,428	\$2,621	\$2,816
Max. Purchase Price (2)	\$349,883	\$407,874	\$465,580	\$523,356	\$569,492	\$615,914
Monthly Mortgage (2)	\$2,039	\$2,331	\$2,662	\$2,913	\$3,146	\$3,362
<i>Moderate-Income Households at 80% to 120% of 2026 HCD Income Limits</i>						
# of Persons	1	2	3	4	5	6
Monthly Gross Income	\$6,796	\$7,767	\$8,738	\$9,708	\$10,483	\$11,263
Max. Monthly Gross Rent (1)	\$2,039	\$2,330	\$2,621	\$2,913	\$3,145	\$3,379
Max. Purchase Price (2)	\$430,799	\$500,146	\$569,492	\$638,767	\$694,116	\$749,822
Monthly Mortgage (2)	\$2,447	\$2,796	\$3,146	\$3,495	\$3,774	\$4,055

(1) Assumes rent, including utilities, does not exceed 30 percent of gross income.

(2) Source: <https://www.calculator.net/house-affordability-calculator.html>, accessed July 3, 2026. The calculator uses the 28/36 rule, a standard lending guideline that borrower's housing costs shouldn't exceed 28% of their gross monthly income, and total debt payments (housing costs plus other debts shouldn't exceed 36%). 20% down payment; \$0.00 car loans, credit cards, student or other loans.

5.5.2 Ownership Housing

Table 5-29 presents Zillow's home value index for Blue Lake, incorporated and cities, and unincorporated Census Designated Places (CDPs). The average home value is \$446,866, with the CDP of Bayside having the highest value and the CDP of Carlotta having the lowest value. Blue Lake's index value is about \$12,000 greater than the median value, and about \$64,000 less than the 75th quartile.

Table 5-29 – Zillow Value Index

Community	Value Index
Blue Lake	\$437,497
Arcata	\$488,248
Bayside	\$587,057
Carlotta	\$363,536
Eureka	\$410,563
Fortuna	\$417,379
Hydesville	\$514,741
Shelter Cove	\$377,304
Humboldt County	\$425,468

Source: www.zillow.com/home-values, accessed April 14, 2026

Table 5-30 lists homes for sale in Blue Lake from 2024 to 2026, and Table 5-30 summarizes the California Association of Realtor's Buyer's Guide for the listed communities. According to Table 5-30, recently most of the Blue Lake homes available for purchase were three-bedroom units priced between \$291,000 to \$625,000, which exceeds the estimated maximum affordable purchase price of a median-income household of four as presented in Table 5-28. While the lower end of the range would be affordable for moderate-income household of four, the average and median prices for these homes are \$140,000 greater than these households can afford. Both tables indicate that across the region there is low supply of one-bedroom units relative to three-bedroom units.

Table 5-30 – Homes For Sale, City of Blue Lake 2024 to 2026

# of Bedrooms	# of Units Available	Price Range	Average Price	Median Price
1	--	--	--	--
2	4	\$180,000 to \$450,000	\$371,500	\$428,000
3	11	\$291,000 to \$625,000	\$483,339	\$499,000
4	3	\$794,999 to \$845,000	\$824,666	\$834,000
5 and 6	--	--	--	--

Source: www.zillow.com/homedetails, accessed April 14, 2026

Table 5-31 – California Association of Realtor's Buyer's Guide, May 2026

Community	3 Bedroom Units	# of Units for Sale	1 Bedroom Units	# of Units for Sale
Arcata	\$699,000	15	\$495,000	1
McKinleyville	\$517,000	20	\$225,000	1
Eureka	\$539,000	39	\$330,000	2
Fortuna	\$489,000	25	\$254,000	2
Humboldt County	\$499,000	232	\$300,000	36

Community	3 Bedroom Units	# of Units for Sale	1 Bedroom Units	# of Units for Sale
Average:	\$548,600		\$320,800	
Median:	\$517,000		\$300,000	

California Association of Realtors, <https://www.car.org/marketdata/interactive/buyersguide>, accessed June 22, 2026.

Assumptions: 20% down payment; current interest rate; 6.44%; last month's interest rate; 6.33%; last year's interest rate; 6.82%.

5.5.3 Rental Housing Costs

Table 5-32 shows the results of a point in time survey of available apartments and houses for rent in the City of Blue Lake. A total of six units were available for rent at the time of the survey was completed. There were no three-bedroom units advertised inside the city at the time of this survey. For multiple years Blue Lake's rental vacancy rate has been zero, according to the 2024 American Community Survey. However, it is difficult to determine the true vacancy rate within the city as many rentals are not advertised. According to the California Housing Partnership's 2026 Affordable Housing Needs Report, average monthly asking rent is \$832, and asking rents have increased by 3.8 percent between Q4 2020 and Q4 2021.⁹

Table 5-32– Rentals

Number of Bedrooms	Price Range	Number of Listings
1	\$1,050 – \$1,800	3
2	\$1,800 – \$2,000	2
4	\$3,295	1

Sources: <https://www.zillow.com/homedetails>, and <https://www.rent.com>, accessed April 16, 2026.

5.5.4 Mobile Home Parks and Costs

According to the Department of Finance's housing unit type data presented in Table 5-21 above, the number of mobile homes has been decreasing since 2010, from 58 mobile homes to 53 in 2024. Mobile homes are a recognized form of naturally occurring affordable housing that can have lower housing costs for both owners and renters. According to HCD'S "Find A Park" portal there are two mobile parks operating inside Blue Lake city limits. Both parks only offer mobile home spaces, are adjacent to one another, and are located on the east side of Blue Lake.¹⁰

⁹ https://chpc.wpenginepowered.com/wp-content/uploads/2022/05/Siskiyou_Housing_Report_2022-AHNR-1.pdf, access March 28, 2023.

¹⁰ The portal is located on this HCD webpage, <https://www.hcd.ca.gov/manufactured-and-mobilehomes/mobilehome-parks>, accessed March 16, 2023.

Table 5-33 – Mobilehome/RV Parks Operating in Blue Lake, 2023

	MH Spaces	RV Lots with Drains	RV Lots without Drains
EVERGREEN MHP	25	0	0
WILLOWS MHP	16	0	0

Together these parks are licensed for 41 mobilehome spaces. Some of the spaces have mobilehomes owned by the park and are rented, while others the mobilehome is owned by the tenant and only the space is rented. The spaces rent for an average of \$485 per month, based on the most recent data.

6.0 Special Populations and Housing Needs and Existing Resources

Housing Element law requires the consideration of the housing needs of special needs persons and households. Certain groups have greater difficulty finding decent, affordable housing due to their special circumstances. Special circumstances may be related to one's employment and income, age, family characteristics, or disabilities. As a result, certain segments of Blue Lake's population may experience a higher prevalence of overpayment, overcrowding, housing cost burden, or other housing problems. State Housing Element law identifies the following "special needs" groups: elderly households; persons with disabilities, including those with developmental disabilities; large households; female-headed households; families and persons in need of emergency shelter; and agricultural workers.

An overview of special populations and existing housing resources in Blue Lake are summarized below. Table 5-34 below provides a summary of special populations in Blue Lake. It is noted an individual may be represented in two special populations, e.g., 198 seniors in Blue Lake also have disabilities as indicated in the table.

Table 5-34 – Blue Lake Special Populations Summary Table

Special Population (2024)	Estimated # of Persons
Seniors (55 and older)	454
Persons with Disabilities	260
Persons with Developmental Disabilities	19
Farmworkers*	30
ELI** (# Households)	105
Single Parent Households, inc. Female-Headed Households	80
Large Households (5 or more persons)	0
Acutely Low-Income and Persons Experiencing Homelessness†	42

Notes: * The value presented is the average of individuals who indicated “agricultural, forestry, fishing, hunting and mining” as their employment by industry in 2024 as reported by the US Census Bureau ACS 5-Year estimate.

**ELI = extremely low income households earning approximately 1%5 to 30% of the area median income or less.

†Acutely low income are households earning approximately 0-15% of the area median income.

Programs HI-11 and HI-13 contain specific commitments for the City proactively facilitate provision of housing for special populations by:

- Offering expedited processing for projects that provide housing for special needs populations.
- Regularly meeting with representatives of social service organizations, area non-profits, etc. to review upcoming notices of funding availability to identify appropriate funding opportunities.
- Moreover, Programs HI-2, HI-3, HI-4, HI-5, and HI-6. commit the City to removing regulatory barriers and allowing the creation of a variety of housing types and housing for various populations.

6.2 Senior Population

Elderly households, sometimes referred to as senior households, typically have special housing needs due to three primary concerns – income, housing and health care costs, and physical disabilities. As citizens get older, their housing needs change. Special housing needs of the elderly include smaller and more efficient housing to minimize maintenance and barrier-free designs to accommodate restricted functions. For the purpose of this analysis, persons who are 55 years of age or older fall into this category.

Table 5-35 shows changes in Blue Lake’s senior population from 2000 to 2024. The data indicate that the number of individuals aged 55 to 64 increased from 2000 to 2024, while the number of those aged 75 and older decreased. The trend for the 65 to 74 age group has been a steady increase. The number of retirement age residents (55-64) stayed about the same between 2010 and 2020. Blue Lake’s overall senior population in 2024 is a larger share of the total population than Humboldt County, 40% versus 31%. With such a high proportion of seniors, this may indicate a demand for a variety of senior housing and living options, including retirement communities and intergenerational housing designed for a range of age groups.

Table 5-35 – Senior Population, 2000, 2010, 2024

Age Group	Blue Lake						Humboldt County	
	2000		2010		2024		2024	
	Number	%	Number	%	Number	%	Number	%
55 to 64 years	105	8.69%	209	16.68%	208	18.33%	17,361	12.72%
65 to 74 years	61	5.05%	80	6.38%	185	16.30%	16,818	12.32%
75 and over	121	10.02%	47	3.75%	61	5.37%	8,368	6.13%
Total Seniors	287	23.76%	336	26.82%	454	40.00%	42,547	31.18%
Total Population	1,208		1,253		1,135		136,463	

Note: Source: 2000, 2010, U.S. Census, 2024 ACS 5-Year Estimates Table S1810.

The data in Table 5-36 below describes the tenure of senior households in the city. The majority of senior households own their homes (69.7 percent). The age groups with the highest ownership rate are the 65 to 74 age group (33.1 percent). Most of the senior renter households are headed by someone aged 55 to 64 years or older (13.4 percent).

Table 5-36 – Senior Households in Blue Lake by Tenure, 2024

Tenure	2024	
	Number	Percent
Owner Occupied		
55 to 64 years	59	16.9%
65 to 74 years	116	33.1%
75 years and older	69	19.7%
Total Owner Occupied	244	69.7%
Renter Occupied		
55 to 64 years	47	13.4%
65 to 74 years	39	11.1%
75 years and older	20	5.7%
Total Renter Occupied	106	30.3%
Total Senior Households	350	100%

Source: 2024 ACS 5-year estimates Table B25007.

The ACS also reports that in Blue Lake in 2024, a total of 64 seniors age 65 or older lived alone, and 10 had incomes below the poverty level.

6.3 Persons with Disabilities

Persons with a disability may live on a fixed income and may have limited income-earning capacity, which limit their ability to pay for housing. Persons with disabilities may need housing that accommodates their accessibility needs, which may include retrofits to homes such as wheelchair ramps. The ACS definition of disability is based on six questions. A person is classified as having a disability if they answer yes to one or more of the following questions¹¹:

- **Hearing difficulty** (asked of all ages): Is this person deaf or does he/she have serious difficulty hearing?
- **Visual difficulty** (asked of all ages): Is this person blind or does he/she have serious difficulty seeing even when wearing glasses?
- **Cognitive difficulty** (asked of persons age 5 or older): Because of a physical, mental, or emotional condition, does this person have serious difficulty concentrating, remembering, or making decisions?
- **Ambulatory difficulty** (asked of persons age 5 or older): Does this person have serious difficulty walking or climbing stairs?
- **Self-care difficulty** (asked of persons age 5 or older): Does this person have difficulty dressing or bathing?
- **Independent living difficulty** (asked of persons age 15 or older): Because of a physical, mental, or emotional condition, does this person have difficulty doing errands alone such as visiting a doctor's office or shopping?

The ACS definition recognizes that disability is a dynamic concept that changes over time as one's health improves or declines, as technology advances, and as social structures adapt.

Table 5-37 describes the population in Blue Lake who may require housing with special features to accommodate persons with disabilities. The majority of the population with disabilities are in the 18 – 64 year and elderly group (65 and older). Most of the disabilities in the 18 – 64 year group are cognitive (28 percent).

Countywide the 65+ age group has the most number of persons with disabilities (36 percent), and in this age group the most common disability is hearing/vision (17% of the total). There are no residential care facilities in the City to support persons with disabilities, which suggests there may be an unmet need for those types of facilities.

¹¹ <https://www.disabilitystatistics.org/help/glossary#68>; accessed July 1, 2026

Table 5-37 – Persons with Disabilities, 2024

	Blue Lake		Humboldt County	
	Number	Percent	Number	Percent
Total Population over 5 years	923	100%	126,184	100%
Population over 5 years with a disability	260	28%	25,808	20%
Total Population 5-17 years	27	100%	18,680	100%
Population 5-17 years with disability	0	0%	2,073	11%
Sensory (Hearing/Vision)	0	0%	12	0%
Ambulatory	0	0%	77	0%
Cognitive	0	0%	1,926	10%
Self-care	0	0%	599	3%
Independent Living	--	--	--	--
Total Population 18-64 years	519	100%	79,785	100%
Population 18-64 years with disability	157	30%	13,747	17%
Sensory (Hearing/Vision)	10	2%	4,031	5%
Ambulatory	39	8%	3,870	5%
Cognitive	147	28%	8,997	11%
Self-care	27	5%	2616	3%
Independent Living	89	17%	5,580	7%
Total Population 65 years and older	377	100%	27,719	100%
Population 65 and older with a disability	103	27%	9,988	36%
Sensory (Hearing/Vision)	64	17%	5,509	20%
Ambulatory	50	13%	5,793	21%
Cognitive	11	3%	2017	7%
Self-care	26	7%	2562	9%
Independent Living	40	11%	3,126	11%

Note: Persons may have more than one disability and percentages may not add up to 100 percent due to rounding. Source: 2020 – 2024 ACS 5-year estimates (Blue Lake), 2024 ACS 1-year estimates (Humboldt County) Table S1810.

6.3.2 Persons with Developmental Disabilities

Senate Bill (SB) 812 requires the City to include discussion of the needs of individuals with a developmental disability within the community in the special housing needs analysis. According to Section 4512 of the Welfare and Institutions Code, a “developmental disability” means a disability that originates before an individual attains age 18 years, continues, or can be expected to continue, indefinitely, and constitutes a substantial disability for that individual which includes intellectual disabilities, cerebral palsy, epilepsy, and autism.

According to the California Department of Developmental Services, in December, 2025 there were an estimated 5,135 consumers of developmental disability services in the Redwood Coast region¹². The region includes Humboldt, Del Norte, Mendocino and Lake Counties which has a combined total population of 314,749 persons as of January 1, 2026¹³. These figures indicate that 1.6% of the region’s population has a developmental disability, and assuming that same percentage occurs in the City of Blue Lake, out of the 1,149 persons estimated to live in Blue Lake in January, 2026, 19 are estimated to have a developmental disability.

Many persons with developmental disabilities can live and work independently in a conventional housing environment. Individuals with more severe disabilities require a group living environment where supervision is provided. The most severely affected individuals may require an institutional environment where medical care and physical therapy are provided. Because developmental disabilities exist before adulthood, the first issue in supportive housing for persons with developmental disabilities is the transition from the person’s living situation as a child to an appropriate level of independence as an adult. Most persons with developmental disabilities in the Blue Lake area with the Zip Code 95525 lived in the home of the parent or guardian and the remainder lived independently or in supportive housing¹⁴.

6.3.3 State and Federal Requirements

In response to the serious lack of accessible housing in the United States, the Fair Housing Act requires that all ground floor dwelling units in buildings of four or more units without elevators and all dwelling units in elevator buildings of four or more units include the following basic features of accessible and adaptive design:

- Public and common areas must be accessible to persons with disabilities; and
- Doors and hallways must be wide enough for wheelchairs.

¹² California Department of Developmental Services, Monthly Caseload Reports, <https://www.dds.ca.gov/transparency/facts-stats/> accessed June 2, 2026.

¹³ Department of Finance, Report E-1 and E1-H Population and Housing Estimates for Cities, Counties, and the State, January 1, 2025 and 2026.

¹⁴ Department of Developmental Services, Consumer Count by California ZIP Code and Residence Type for the End of December, 2021.

- All units must have:
 - o An accessible route into and through the unit;
 - o Accessible light switches, electrical outlets, thermostats, and other environmental controls;
 - o Reinforced bathroom walls to allow later installation of grab bars; and
 - o Kitchens and bathrooms that can be used by people in wheelchairs.

The Fair Housing requirements are included in California's Title 24 regulations, which are enforced by the City through its building codes, building plan review, and site inspections.

In the case of persons with a physical or mental disability (including hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex, and mental retardation) that substantially limits one or more major life activities, landlords may not:

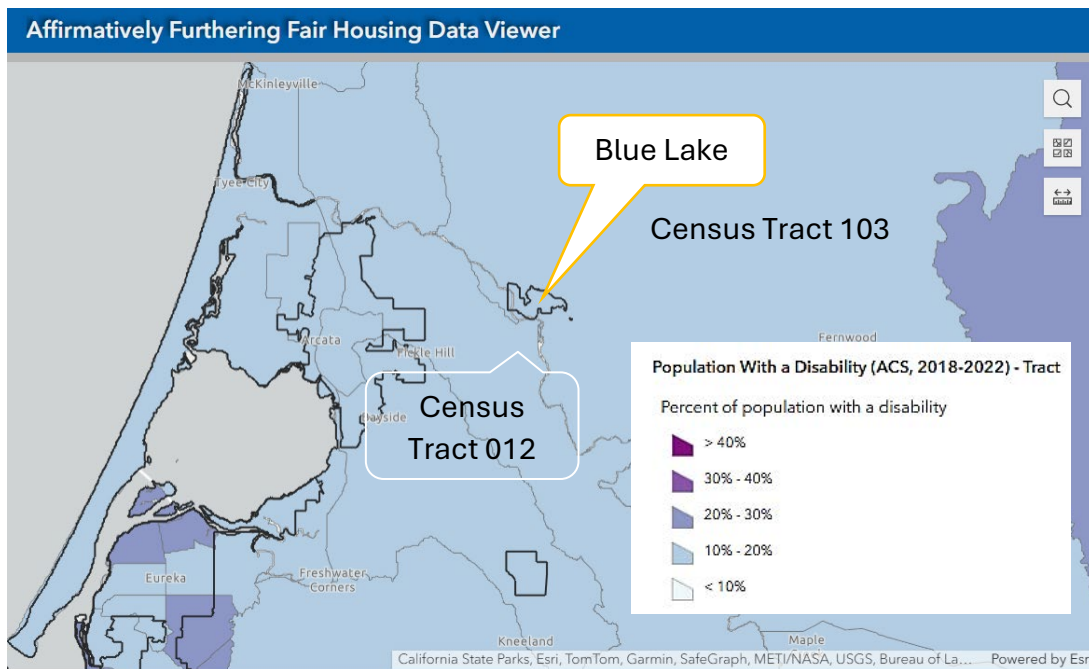
- Refuse to let tenants make reasonable modifications to their dwelling or common use areas, at their expense, if necessary for the disabled person to use the housing; or
- Refuse to make reasonable accommodations in rules, policies, practices, or services if necessary for the disabled person to use the housing.

Besides the construction of new accessible housing, the needs of individuals with limitations can sometimes be met by simply retrofitting existing housing to transform conventional units into suitable housing. This is perhaps the least costly way in which to provide accessible housing.

6.3.4 Persons with Disabilities: Patterns and Trends

The regional comparison in Figure 9 indicates Blue Lake had a similar percentage population of persons with disabilities as surrounding areas in 2022. Adjoining Blue Lake are Census Tracts where the percentage of persons with a disability is 10 to 20 percent of the population according to the 2022 ACS data in HCD's Affirmatively Furthering Fair Housing (AFFH) viewer.

Figure 9 – Population with a Disability in Blue Lake and Surrounding Areas



Source: [HCD's AFFH Viewer](#) accessed June 3, 2026

However, the more 2024 ACS data indicates the percentage of persons with disabilities may have increased in Blue Lake compared to neighboring census tracts and the County as a whole. The percent of the population in Blue Lake reporting a disability was 26% in 2024 whereas in Census Tract 012 to the south 17 percent of the population reportedly had a disability and in Census Tract 103 to the north, 18% of the population reported a disability. For overall Humboldt County, 20% of the population reported having a disability. This differential may be attributed to the number and share of Blue Lake residents who are 55 and older has increased according U.S. Census data as presented in Table 5-35. The data in Table 5-35 indicates that while Blue Lake's total population declined between the 2010 and 2020 Decennial Censuses (and the 2024 ACS indicates this pattern has continued), the overall number of individuals who are 55 and older increased, which results in corresponding share increase of Blue Lake's total population. The County saw similar changes, as reported in Table 5-4 above. While the number and share of individuals who are 55 and older increased in the County, the changes do not appear as significant when compared to Blue Lake's due to the overall larger population and that the County's population did not decline between 2010 and 2020.

Table 5-38 below shows the disabled population by race in Blue Lake in 2024. It shows that nearly all persons with disabilities are white, and 28 percent of the white population report having a disability. The only other racial category with any reported disabilities are "Two or more races", which reportedly has a disability rate of 16 percent.

Table 5-38 – Disability by Race and Ethnicity, Blue Lake, 2024

Race and Hispanic or Latino Origin	Total	With a Disability	% with a Disability
White alone	903	252	27.9%
Black or African American alone	0	0	-
American Indian and Alaska Native alone	19	0	0.0%
Asian alone	0	0	-
Native Hawaiian and Other Pacific Islander alone	8	0	0.0%
Some other race alone	2	0	0.0%
Two or more races	50	8	16.0%
White alone, not Hispanic or Latino	877	252	28.7%
Hispanic or Latino (of any race)	26	0	0.0%
Source: ACS 5-Year, 2024, Table S1810			

Table 5-39 below provides a summary comparison of the oldest age groups using 2024 ACS data. In these age categories, Blue Lake residents have a significantly lower rate of disability in comparison to Humboldt County.

Table 5-39 – Total Disabilities for Ages 65 and Older

Ages	Blue Lake		Humboldt County	
	Number	Percent	Number	%
65-74 years	61	21.6%	4,674	28.5%
75 and older	42	44.2%	5,314	46.9%
Total	103	65.8%	9,988	75.4%
Source: 2020 – 2024 ACS 5-year estimates (Blue Lake), 2024 ACS 1-year estimates (Humboldt County), Table S1810				

6.4 Large Households Patterns and Trends

A large household is one with five or more members. Large households are considered a special needs group because they require larger homes, but do not necessarily make enough money to afford many of the larger homes that may be available. Large homes are often luxury homes out of the range of affordability for lower income households; thus, a large household may struggle to find suitable affordable housing. Another potential outcome for large families who are unable to find appropriate housing is overcrowding.

The number of large households, by tenure, in the City is shown in Table 5-40, along with data for Humboldt County. According to 2024 ACS there are no renter-occupied or owner-occupied large households in the City. In the County most of the large households (63.8%) lived in houses they own.

Table 5-40 – Large Households by Tenure, 2024

	Blue Lake		Humboldt County	
Owner Households				
5 persons	0	0%	1,798	48.6%
6 persons	0	0%	262	7.1%
7 or more persons	0	0%	302	8.2%
Owner Total	0	--	2,362	63.8%
Renter Households				
5 persons	0	0%	359	9.7%
6 persons	0	0%	318	8.6%
7 or more persons	0	0%	664	17.9%
Renter Total	0	--	1,341	36.2%
Total Large Households	0	--	3,703	100%

Source: 2020 – 2024 ACS 5-year estimates (Blue Lake), 2024 ACS 1-year estimates (Humboldt County) Table B25009.

Household sizes have been fluctuating in Blue Lake. As shown in Table 5-41, after increasing in 2010 from 2000, the average household size decreased to 2.23 persons per household in 2020.

Table 5-41 – Household Size, 2000-2020

Year	Population	Households	Persons per Household	Household Size Percent Change
2000	1,135	504	2.25	--
2010	1,253	518	2.42	7.5%
2020	1,208	541	2.23	(8.4%)

Source: 2000, 2010 and 2020 U.S. Census.

Table 5-42 shows the number of persons per unit for occupied units by tenure. The number of persons per unit is fluctuating for both renter and owner units. After increasing in 2010 from 2000, the average household size decreased to 1.46 persons per rental unit, and 1.92 persons per owner-occupied unit in 2020. There are generally more persons per unit in an owner-occupied housing units throughout the time period.

Table 5-42 – Household Size by Tenure, 2000-2020

Year	Renter Occupied Housing Units	Persons per Renter Unit	Owner Occupied Housing Unit	Persons per Owner Unit
2000	194	1.99	310	2.41
2010	223	2.33	295	2.62
2024	227	1.46	314	1.92

Source: 2000, 2010 U.S. Census, 2024 ACS 5 Year Estimates Table B25010.

6.5 Single-Parent and Female-Headed Households

Single-parent households, and those headed by single females in particular, experience the full range of housing problems. Single parent households, particularly female-headed households, generally have lower-incomes and higher living expenses, often making the search for affordable, decent, and safe housing more difficult. Single parent households often cannot afford units large enough to accommodate their families which in turn increases the possibility of overcrowding; and sometimes, they experience discrimination. In addition to difficulties faced by these households in finding and maintaining affordable housing, these households also typically have additional special needs relating to access to day care/childcare, health care and other supportive services. The City of Blue Lake recognizes these problems and has included policies and programs to address affordability, overcrowding, and discrimination for all segments of the population.

Table 5-43 – Single-Parent Households, 2010 and 2024

	Households	% of Single-Parent Households	% of Total Households
Blue Lake 2010			
Total Households	518	--	100%
Female householder, no spouse, with Children	43	72%	8.3%
Male householder, no spouse, with Children	17	28%	3.3%
Total Single-Parent Households with Children	60		11.6%
Blue Lake 2024			
Total Households	575		100%
Female householder, no spouse, with Children	0	0%	0%
Male householder, no spouse, with Children	25	100%	4.4%
Total Single-Parent Households with Children	25		4.4%
Humboldt County 2024			
Total Households	55,558		100%
Female householder, no spouse, with Children	5,818	64.2%	10.5%
Male householder, no spouse, with Children	3,249	36.8%	5.8%
Total Single-Parent Households	9,067		16.3%

Source: U.S. Census Bureau. "Households and Families." American Community Survey, ACS 1-Year Estimates Subject Tables, Table S1101,

	Households	% of Single-Parent Households	% of Total Households
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<https://data.census.gov/table/ACSST1Y2024.S1101?q=S1101&g=050XX00US06023>.

Accessed on 19 Jun 2026.

The total number of single-parent households in the City decreased from 2010 to 2024, as shown in Table 5-43: in 2010, there were 60 single-parent households, and in 2024, there were 25. In 2024, there were no single-parent female-headed households, when they comprised 8.2% of all households in Blue Lake. However, underreporting maybe occurring as the City is aware that some current and previous employees are single female-headed households with children at home.

Table 5-43 also compares the number of households that are headed by single parents in Blue Lake and Humboldt County, as per 2024 ACS data. Single-parent households comprise 4.4% of all households in the City and a little more than 16% in the County in 2024.

Housing needs of lower-income single-parent households can be more acute than those of other lower-income households. Both male and female headed single-parent households are subject to child day care costs in order to allow the household head to work. Many single-parent households are in poverty. As shown in Table 5-44 below, of households with children in the home, female-headed single parent households have the highest poverty rate in Humboldt County at 15.9 percent.

Blue Lake appears to be very different from the rest of the County. First, the ACS reported no female-headed households below the poverty level in 2024. The ACS also reported the poverty status for all families declined by more than half, dropping from 9.6% in 2010 to 4.4% in 2024.

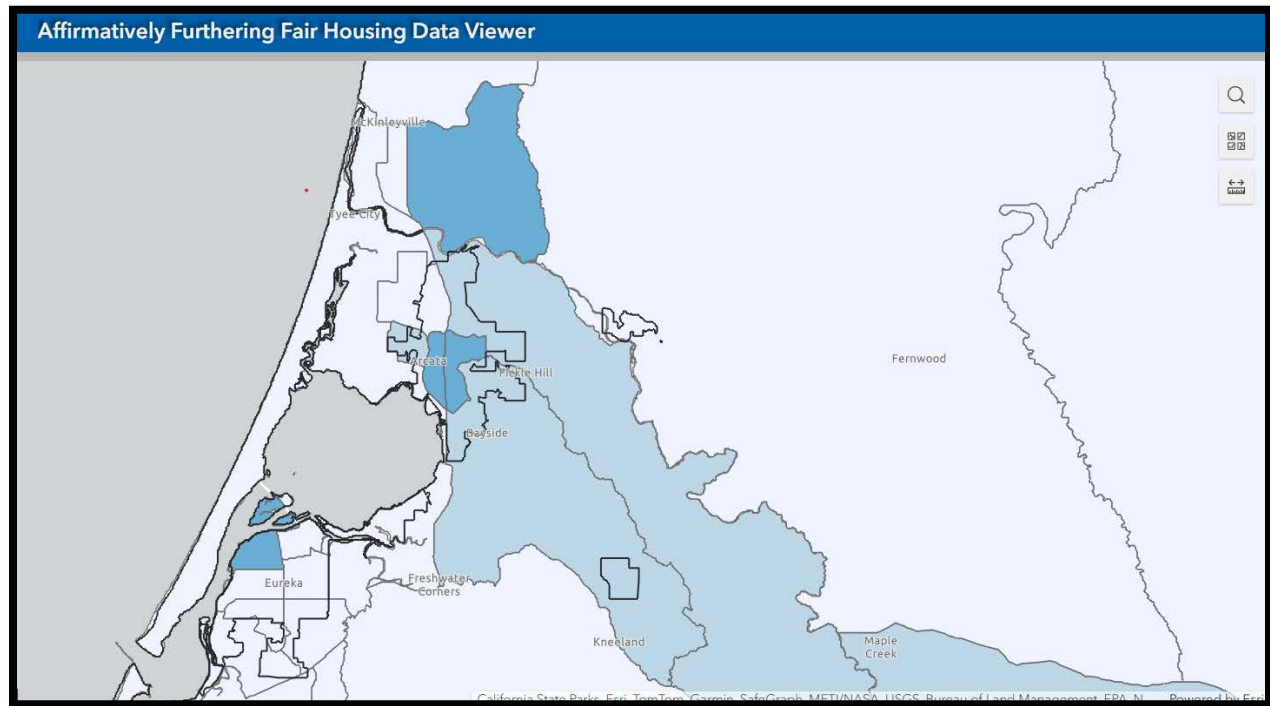
Table 5-44 – Poverty Status by Family Type 2010, 2024

	Blue Lake		Humboldt County	
Family Type	2010	2024	2010	2024
Female Householder	89	44	6,779	5,818
Percent below poverty level	14.6%	0%	25.4%	15.9%
Married Couples	170	193	22,441	20,369
Percent below poverty level	8.2%	0%	3.9%	6.3%
Total Families	280	273	32,189	29,436
Percent below poverty level	9.6%	4.4%	9.5%	10.7%

2010 and 2024 ACS 5-year Estimates (City) and 1-year Estimates (County), Table S1101

Figure 10 below shows that Blue Lake has a low percentage of female headed household and no spouse/partner in comparison to the region. The Census Tracts south of the City have higher rates of single parent female headed households at 20 to 40 percent.

Figure 10 – Percent of Children in Female Headed Households, No Spouse Partner Present



Source: [HCD's AFFH Viewer](#) accessed June 3, 2026

6.6 Farmworkers

Farmworkers are defined as those households whose wage-earners make their living through permanent or seasonal agricultural work. Farmworker households may move with the seasons to different farming communities, or those who find tree planting jobs and who also move throughout the forested regions on a seasonal basis. Farmworker households may permanently reside in a community. According to the 2022 U.S. Department of Agriculture Census, it is estimated there were nearly 1,468 farmworkers in Humboldt County. Of those, approximately 625 worked 150 days or more at the same farm, whereas 843 worked less than 150 days on the same farm. This data suggests that a majority of farmworkers are seasonal.

Regionally, agricultural operations and timber production dominate the landscape. According to the 2017 Humboldt County General Plan there are 1.2 million acres of private forested land and 0.3 million acres of public forested land in Humboldt County, covering more than 80% of the County's land area. Closer to Blue Lake, the agricultural uses are primarily small farms and timberlands with little need for seasonal or permanent

farmworkers. Intensive farming does not occur within Blue Lake’s city limits. There is one 15-acre parcel on the south side of the City zoned Agriculture-Exclusive that may have active agricultural operations; however, based on recent aerial imagery of the site it appears to be used for grazing which would likely not require farmworkers or farmworker housing.

The 2024 American Community Survey indicates there are approximately 30 individuals, over the age of 16, employed in the agriculture, forestry, fishing and hunting, and mining industries and live in the City (ACS, Table DP03, 2024). Close to the City there are several sand and gravel mining operations which may be a source of employment for some of those individuals. Also, Green Diamond Resource Company operates a tree nursery in nearby Korbel, which may also employ some of those individuals.

Table 5-45
Hired Farm Labor – State of California and Humboldt County, 2022

	Farms	Hired Workers	\$1,000 payroll
California	26,053	372,134	9,575,439
Humboldt County	224	1,468	44,799

Source: USDA Census of Agriculture 2022

Table 5-46 – Hired Farm Labor – State of California and Humboldt County, 2022

		California	Humboldt Co.
150 Days or More	Farms [All]	17,749	128
	Workers [All]	205,171	625
	Farms with 10 or More Workers		
	Farms	4,819	25
	Workers	168,060	863
Fewer than 150 Days	Farms [All]	16,273	158
	Workers [All]	166,963	843
	Farms with 10 or More Workers		
	Farms	3,115	12
	Workers	130,995	477

Source: USDA Census of Agriculture 2022

In 2022 a Farmworker Health Study (FWHS) survey funded by the California Department of Public Health ¹⁵ was published which found most farmworkers in California lived in large, overcrowded households with low incomes and several household problems, arrangements associated with decreased mental health. The study found farmworkers

¹⁵ UC Merced Community and Labor Center, Farmworker Health In California: Health In A Time Of Contagion, Drought, And Climate Change, 2022.

households were larger than the California average (3.0 persons per household), with a median household size of four persons. Over one-fourth (29%) of farmworkers' households had six or more persons. More than half (55%) of farmworkers reported that two persons (including themselves) slept in their room - a figure somewhat less than the percent married (67%) - but more than one-fourth (25%) slept in a room with three or more persons indicating over-crowding.

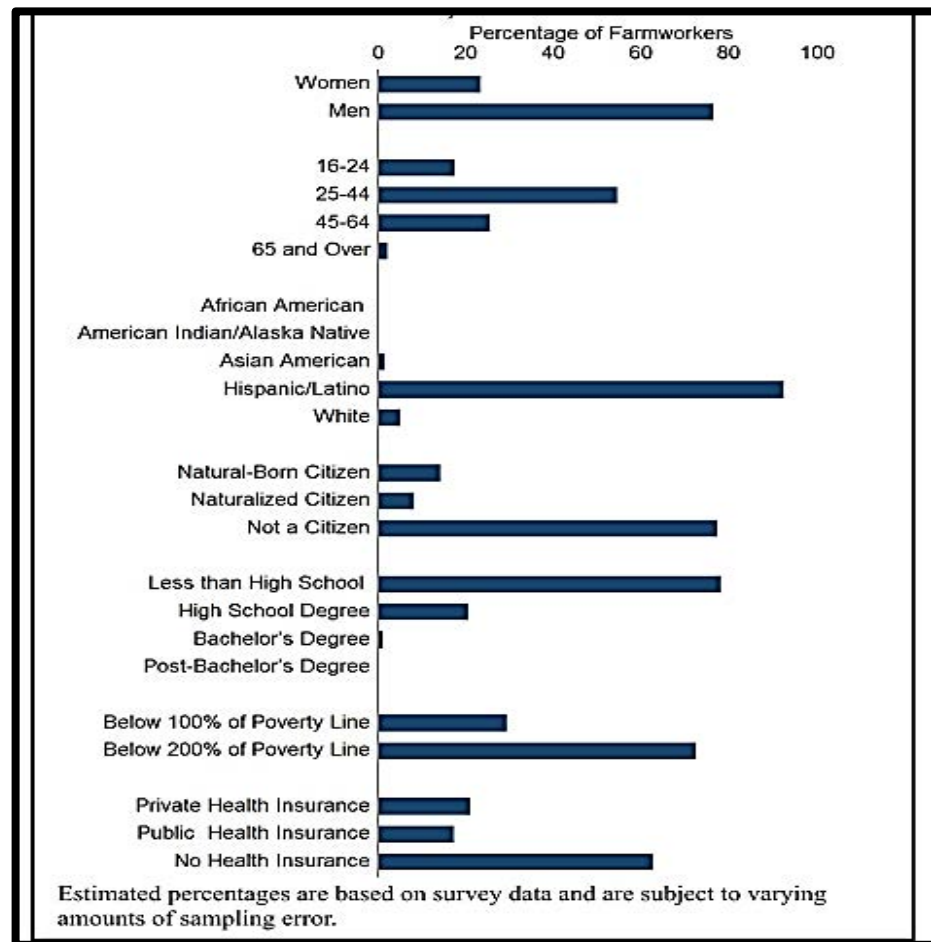
The survey found children were a significant part of respondents' households. More than two-thirds (70%) of farmworkers lived in households with one or more children under the age of 18. The median number of children per household was two, and more than two in five (42%) households had three or more children. Only two percent of farmworkers lived in households with children who worked.

The City was unable to locate Blue Lake-specific demographic data of farmworkers. Figure 11 provides a demographic summary of key characteristics of California Farmworkers based on 2009-2011 American Community Survey data which is assumed to be representative of the current farmworker population in Blue Lake, with the exception of farmworkers employed in the cannabis industry. According to this report, farmworkers in California:

- Are more likely to be men
- Between the ages of 25 and 44
- Over 80 percent are Hispanic/Latino
- Are not a citizen
- Have less than a high school education
- Live below the poverty line, with a majority living 200 percent below the poverty line
- Do not have health insurance

Figure 11 –
Demographic
Summary of
California
Farmworkers,
2011

Source: Farmworkers
in California: A Brief
Introduction, Latino
Caucus, October
2013.



The National Agricultural Workers Survey (NAWS) data finder also provides some 2022 demographic insights that point to farmworker housing needs: (<https://www.dol.gov/agencies/eta/national-agricultural-workers-survey/naws-data-finder> accessed June 3, 2026). The NAWS data include crop worker characteristics: demographics; employment; health; housing; and income, earnings, and assets.

- 22% of US crop workers' lived in crowded housing (more than one person per room).
- Almost 30% had incomes between \$20,000 and \$30,000 (29.2 percent).
- 68% of interviewed farmworkers were men.
- Farmworkers' average age was 39.
- 66% of all farmworkers were married.
- 40% of all farmworkers had children.
- 40% said the highest level of formal education completed by farmworkers was ninth grade.

Altogether these data indicate that farmworker housing needs to be affordable to extremely low and very low income households. Housing configurations for families and group living

situations are needed. Farmworker housing needs to be located near schools and employment opportunities for spouses. Also, the data indicates a need for the dissemination of fair housing materials being made available in Spanish, and proactive outreach to the farmworker community. There are two general categories of farmworker housing which are both regulated by the state Health and Safety Code (HSC):

- Housing provided by the Employer: Living quarters provided by an employer in connection with any work (including agricultural work), whether or not rent is involved. HSC 17008(a) applies.
- Housing not provided by the Employer: Living quarters that house agricultural workers employed by an agricultural employer(s) but the housing is not provided by the employer. HSC 17008(b) applies.

Additionally HSC §§ 17021.5 through 17021.8 details how cities are to regulation employee housing, including farmworker housing:

- Allow agricultural employee housing for six or fewer persons by-right in residential single family zones, and other zones that permit single-family dwellings, subject to the same regulations as a single-family dwelling.
- Allow agriculture employee housing of no more than 12 units or 36 beds as a by-right agricultural use in agricultural zones (the Agricultural Exclusive (AE) zoning district for Blue Lake). Provide streamlining to allow qualifying employee housing on qualifying lands designated as agricultural.

As discussed in Chapter 6, at this time the Blue Lake Zoning Ordinance does not reflect recent amendments to the cited HSC sections; therefore, it is the City's practice to apply State law directly when reviewing employee housing applications. Program HI-2(G) commits the City to amending the Zoning Ordinance to address these inconsistencies.

6.7 Acutely Low Income Households and Persons Experiencing Homelessness

Individuals and families may find themselves homeless for a variety of economic, social and/or personal reasons. Their homelessness can be a temporary, a semi- or permanent living situation. Each situation in which people become homeless is different, requiring different housing needs. Regardless of the cause, the most immediate housing needs can be satisfied with three basic shelter types: emergency, transitional and temporary.

The Point in Time Count (PIT) is an annual census of persons experiencing homelessness coordinated by the Humboldt Housing and Homelessness Coalition. The count provides data to help communities prioritize shelter and housing services meeting the needs of this special population.

As PIT Counts are linked to federal programs the federal definitions of homelessness are used in the counts. The federal definitions consider persons who are experiencing homelessness to be either:

- An unsheltered homeless person/household resides in: A place not meant for human habitation, such as cars, parks, sidewalks, abandoned buildings, or on the street.
- A sheltered homeless person/household resides in: A supervised publicly, or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs).

HUD defines a chronically homeless individual as an adult (persons 18 years or older) who has a disability and:

- Has either been continuously homeless for a year or more; or
- Has had at least four separate occasions of homelessness in the past three years where the combined total length of time is at least 12 months. Each period separating the occasions must include at least seven nights of living in a situation other than a place not meant for human habitation, in an emergency shelter, or in a safe haven.

To be considered chronically homeless, persons must have been sleeping in a place not meant for human habitation (e.g., living on the streets) and/or in an emergency shelter/safe haven during that time. The chronic homeless population represents one of the most vulnerable populations and some of the hardest to house.¹⁶

For the Humboldt County region, the 2024 PIT counted 551 chronically homeless individuals down from 746 in 2022, a 26% decrease. The 2024 PIT counted 42 persons experiencing homelessness in the Blue Lake area. This is an increase of 28 persons from the 2019 count which identified 14 persons experiencing homelessness in the Blue Lake area. In 2022, Blue Lake and McKinleyville communities were combined and 32 individuals were counted, as shown below in Table 5-47. The most recent PIT Count data indicates there may be more unhoused people living in and/or near Blue Lake, which is different pattern than that of the County as a whole which saw a decrease of 129 persons in the homeless population during this same time period. However, for all PIT Counts it is unknown how many individuals were counted within Blue Lake city limits verses living nearby but in the unincorporated area. Regardless and as discussed further below, the Blue Lake Resource Center does provide support services and coordinates with Humboldt County Department of Health and Services to assist with connecting unhoused individuals with shelter but a shelter does not operate in the City of Blue Lake.

¹⁶ NorCal Continuum of Care, 2022 Point in Time Count final report, pg. 20.

Table 5-47 – Persons Experiencing Homelessness, 2019 and 2024

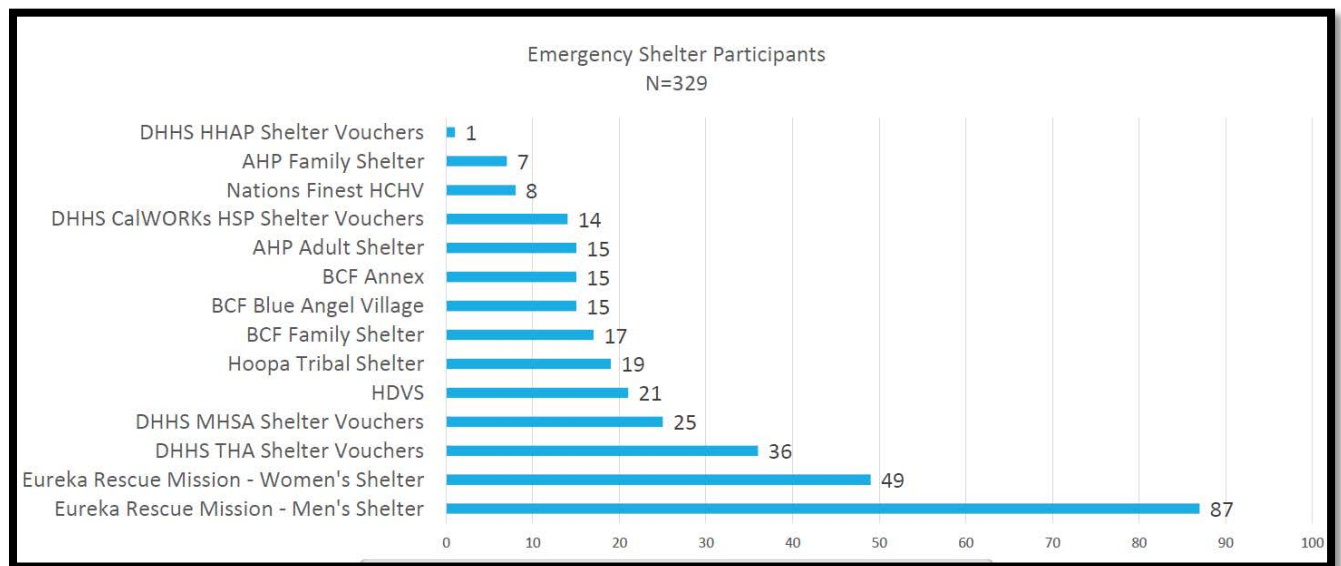
Location	2019 Total Persons	2022 Total Persons	2024 Total Persons
Blue Lake Area	14	32*	42
Humboldt County Total	1,702	1,656	1,573

* For this PIT Count, the communities of Blue Lake and McKinleyville were combined

Source: Blue Lake 6th Cycle Housing Element, 2024 PIT Count, Humboldt Housing and Homelessness Coalition, June 26, 2024

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.

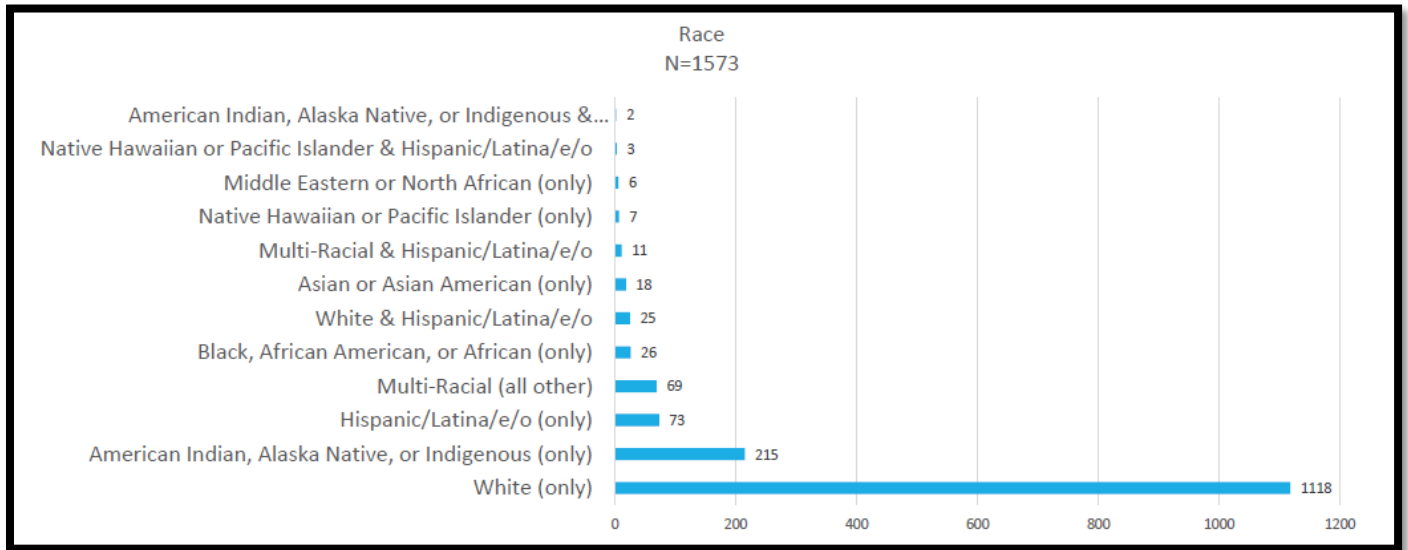
While there are no shelter beds within the City of Blue Lake identified in the 2024 report, Figure 12 below lists the shelters in surrounding areas that may be available to serve the unhoused population in the Blue Lake area. The nearest emergency shelters are provided by the Arcata House Partnership (AHP) approximately four miles west from Blue Lake.

Figure 12 – Emergency Shelters in Humboldt County

Source: 2024 Point In Time Count, Humboldt Housing Coalition

Figure 13 below provides the available racial and ethnic composition data from the 2024 PIT count for Humboldt County. This data indicates the majority of unsheltered individuals in Humboldt County are White and Non-Hispanic, and American Indian/Alaska Native being the next largest racial group.

Figure 13 – Race in the 2024 PIT Count



Source: 2024 Point In Time Count, Humboldt Housing Coalition

Figure 14 shows the gender of homeless individuals in the 2024 PIT. Approximately 2/3 of the individuals counted were male.

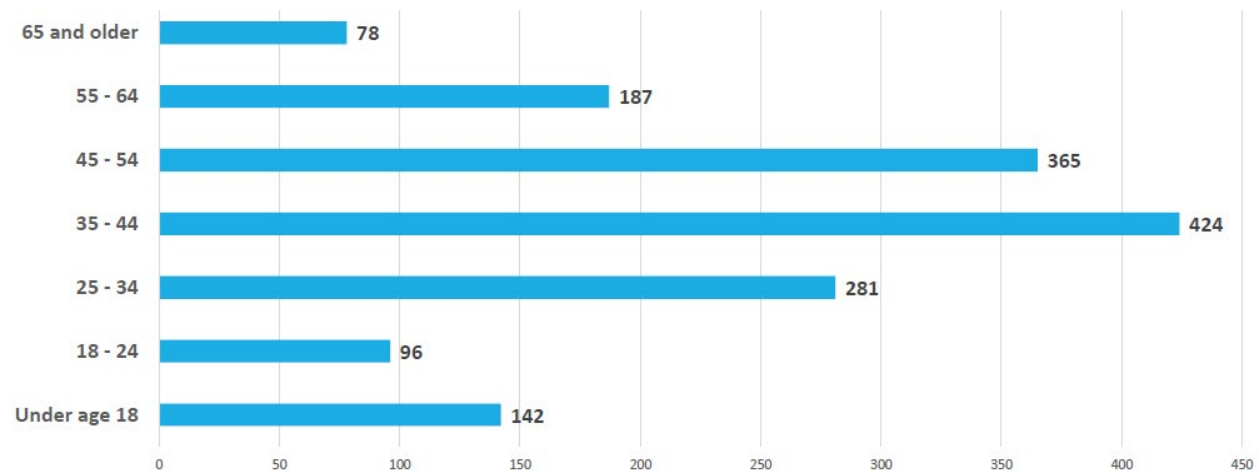
Figure 14 – Gender of Individuals in the 2024 PIT Count

Woman (Girl if child)	508
Man (Boy if child)	1043
Culturally Specific Identity	0
Transgender	2
Non-Binary	2
Questioning	0
Different Identity	0
Multiple Genders	18

Source: 2024 Point In Time Count, Humboldt Housing Coalition

With respect to age, 142 children under the age of 18 were counted in the 2024 PIT Count. This percentage of minor children who are experiencing homelessness in Humboldt County is high, particularly considering they are the most vulnerable age group in the population.

Figure 15 – Age of Individuals in the 2024 PIT Count



Source: 2024 Point In Time Count, Humboldt Housing Coalition

Clearly there is a need for shelter and housing that is available and affordable to persons and families who experience homelessness. While emergency shelters provide temporary shelter and safe place to be, they do not provide a long term solution. Overall addressing the housing needs of this special population requires a variety of housing types that is assured to be affordable, mostly by way of government subsidies, such as housing choice vouchers. There are examples of communities that employ more affordable housing forms that could provide pathways for homeless persons to get into housing, such as tiny houses.

The City's Zoning Ordinance allows emergency shelters by right in one zone – the Opportunity Zone or O-Zone. The zone allows emergency shelters that are limited to occupancy of six months or less with onsite management and security and limited to a maximum of 15 beds. It also requires a separation of 300 feet between emergency shelters. There are other performance standards that apply more generally to any development in the O-Zone that would also apply to emergency shelters, and some of these, such as the lighting and parking standards, go beyond the current restrictions allowed by state law. Program HI-2(F) that is included in Chapter 4 of this Element proposes to modify the emergency shelter requirements to be consistent with current state law.

Permanent supportive housing is also needed to meet the needs of those experiencing chronic homelessness and disabilities. The 2024 PIT estimated 412 homeless individuals in the County had a severe mental illness disability which speaks to a need for permanent supportive housing and group homes. Given the number of children experiencing homelessness, housing that is configured for families, is affordable for this target population, and is located close to schools is critical. Universally, housing for this target population needs to be located close, e.g., no more than a quarter of a mile, from a transit stop. Ideally the housing would be close to essential services such as a full grocery store, pharmacy, and other services to meet day-to-day needs of individuals; however, Blue Lake does not have a grocery store, pharmacy or other stores that offer typical essentials. The closest grocery store is in

community of Glendale, however, transit service is not available. Limited transit service is available to the City of Arcata, where there are several shopping options for groceries, pharmacies, and other essential services. The Blue Lake Resource Center operates a food pantry and hygiene supplies closet, and holds twice monthly food distribution days. Housing Element Programs HI-11 and HI-13 make progress on these needs to work collaboratively at the regional level to address homelessness, to improve housing opportunities for acutely low income households.

The City's programs dovetail with the regional efforts of the Humboldt Homeless and Housing Coalition's "Regionally Coordinated Homelessness Action Plan for Fiscal Years 2023 – 2024 through 2027-2028".¹⁷ For example, Key Action PM 1 of that Plan seeks to secure \$1,308,215 in state funding for permanent housing that serves people experiencing homelessness. Program HI-13(G) commits the City to exploring entering into a multi-jurisdictional agreement to provide housing and/or shelter for persons experiencing homelessness

6.8 Extremely Low Income Households

Extremely low income (ELI) households are defined as households with a gross annual income that is between approximately 15 to 30 percent of the area median income (AMI).¹⁸ HCD and HUD calculate AMI levels for Humboldt County; these governmental agencies do not calculate AMI for cities. Most, if not all, extremely low income households require rental housing, and are more likely to face housing problems such as overpaying, overcrowding, and accessibility issues, and substandard housing conditions. Extremely low-income homeowners often cannot afford the repairs and maintenance necessary to maintain a housing unit's condition. Extremely low-income households can fall within a special needs category (disabled, seniors, large households, or female-headed households) and require supportive housing services, which are limited in Blue Lake. Most families and individuals receiving public assistance, such as social security insurance or disability insurance, are considered extremely low income households. Many minimum wage workers would also be considered extremely low-income households.

Tenure and Trends. As shown in Table 5-48, a Blue Lake family or household of four in 2026 with a gross annual income of up to \$33,000 is considered to be extremely low income, and an individual with a gross annual income of \$20,450. Based on the 2024 ACS for the City, most Blue Lake households are one or two person households, and when these figures are

¹⁷ <https://www.hcd.ca.gov/sites/default/files/docs/grants-and-funding/calich/hhap-round5/humboldt-application.pdf>, accessed July 16, 2026.

¹⁸ To determine the extremely low-income limit, HUD uses the Federal Poverty Guidelines, published by the Department of Health and Human Services. The poverty guidelines are a simplified version of the federal poverty thresholds used for administrative purposes — for instance, determining financial eligibility for certain federal programs. HUD compares the appropriate poverty guideline with 60% of the very low-income limit and chooses the greater of the two as the extremely low-income limit. The value may not exceed the very low-income level.

combined together, at least 105 Blue Lake households (renter and owner) were estimated to be extremely low income in 2024, 18 percent of the total number of households.¹⁹

The Health and Safety Code Sections 50052.5 and 50053 define housing affordability for ELI households to be no more 30% of the household's gross income. Table 5-48 also shows the maximum affordable housing cost for ELI households in 2026 using the definition of affordable per the cited Health and Safety Code Sections.²⁰

Figure 16 depicts the data in columns highlighted with yellow in Table 5-49 by tenure. It shows that at the beginning of the 2015-2019 ACS data collection period, Blue Lake owner households who are ELI began to decline. ELI renter households, as a percentage, had trended downward until the 2014 to 2018 CHAS, when the percentage ELI renter households relative to other renter households who are not ELI generally plateaued. The most recent CHAS data indicates that the plateau pattern may be transitioning and the share of renter households who are ELI is increasing.

Table 5-48 – Cost of Housing to be Affordable for ELI Households, 2026

Four Person Household	
Humboldt County AMI	\$97,100
Income Limit for ELI HH	\$33,000
Max. Monthly Cost	\$825
Max. Annual Cost	\$9,900
One Person Household	
Humboldt County AMI	\$67,950
Income Limit for ELI HH	\$20,450
Max. Monthly Cost	\$511
Max. Annual Cost	\$6,132

“AMI” means Area median income; “ELI: means extremely low income; “HH” means household

Table 5-49 – Extremely Low Income Households²¹

Year	ELI Owner Households			ELI Renter Households			ELI Total	
	# of HH†	% of All Owner HH†	As a % of ELI HH	# of HH†	% of All Renter HH†	As a % of ELI HH	Total # of HH†	% of All HH †
2012-2016 ACS	10	3.9%	20.0%	40	19.0%	80.0%	50	10.6%

¹⁹ The 2024 ACS for Blue Lake reported that 105 households had incomes of \$10,000 or less.

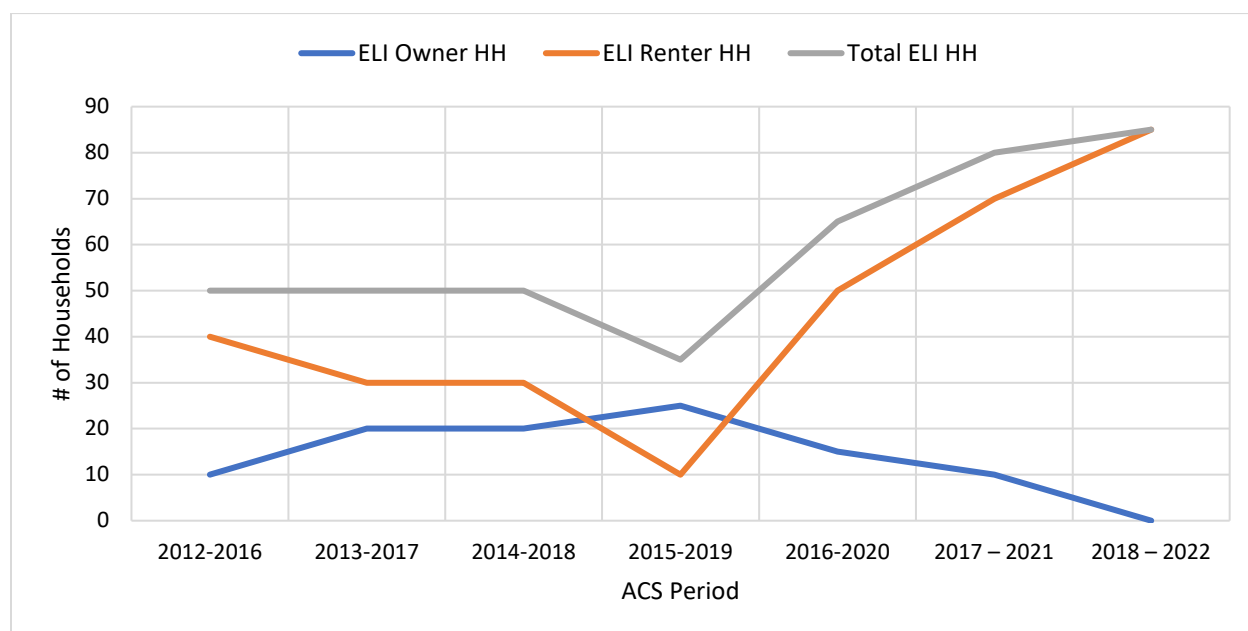
²⁰ For extremely low income households, the product of 30 percent times 30 percent of the area median income adjusted for family size appropriate for the unit.

²¹ Household is defined as “All people living in a housing unit. Members of a household can be related (see family) or unrelated” HUD CHAS.

Year	ELI Owner Households			ELI Renter Households			ELI Total	
	# of HH†	% of All Owner HH†	As a % of ELI HH	# of HH†	% of All Renter HH†	As a % of ELI HH	Total # of HH†	% of All HH †
2013-2017 ACS	20	7.1%	40.0%	30	14.3%	60.0%	50	10.2%
2014-2018 ACS	20	7.1%	40.0%	30	17.1%	60.0%	50	11.0%
2015-2019 ACS	25	9.8%	71.4%	10	5.7%	28.6%	35	8.1%
2016-2020 ACS	15	5.8%	23.1%	50	25.6%	76.9%	65	14.3%
2017 – 2021 ACS	10	3.7%	12.5%	70	31.8%	87.5%	80	16.5%
2018 – 2022 ACS	0	0.0%	0.0%	85	41.5%	100.0%	85	18.9%

† Counts per HUD Comprehensive Housing Affordability Strategy (CHAS) Source: HUD, Consolidated Planning/CHAS Data, <https://www.huduser.gov/portal/datasets/cp.html>, accessed June 9, 2026.

Figure 16 – Number of Blue Lake Households that are ELI 2012 – 2022
(Yellow Columns in Table 5-46)



Source: HUD, Consolidated Planning/CHAS Data, <https://www.huduser.gov/portal/datasets/cp.html>, accessed June 9, 2026.

Table 5-49 show changes in tenure (renter vs. owner) of ELI households over time for Blue Lake. During the 2015-2019 CHAS period, the share of ELI owner households relative to ELI renter households has been consistently trending downward, while during the same period,

an increasing number of renter households are ELI. The most recent CHAS period, which is 2018-2022, the data indicates all ELI households are renters, while no owner households are ELI. Overall, the data indicates the following patterns:

- Owner households who are ELI are disappearing.
- There has been a sharp Increase in renter households who are ELI. In fact, all ELI households are now renters.

An increasing share of renter households who are ELI indicates significant affordability challenges, and decreasing access to affordable ownership housing. While Table 5-1 shows that Blue Lake's population has been steadily declining, the number of ELI renter households has been increasing, which may indicate deepening renter poverty and cost burden, consistent with the data in Table 5-20.

B. Housing Problems

Safe and affordable housing is an essential component of healthy communities. Residents who do not have a kitchen in their home are more likely to depend on unhealthy convenience foods, and a lack of plumbing facilities increases the risk of infectious disease. Research has found that young children who live in crowded housing conditions are at increased risk of food insecurity, which may impede their academic performance. In areas where housing costs are high, low-income residents may be forced into substandard living conditions with an increased exposure to mold and mildew growth, pest infestation, and lead, or other environmental hazards.²² Housing problems presented below are sourced from the most current CHAS, which is the 2018-2022 data year. CHAS reports data for the number and share of households with one of the following four housing problems:

1. Unit lacks complete kitchen facilities
2. Unit lacks complete plumbing facilities
3. More than one person per room
4. Cost Burden - monthly housing costs (including utilities) exceed 30 percent of monthly income

Additionally, the CHAS provides data on the number and share of households with one or more of the following severe housing problems, defined as:

1. Unit lacks complete kitchen facilities
2. Unit lacks complete plumbing facilities
3. More than one person per room
4. Severe Cost Burden - monthly housing costs (including utilities) exceed 50 percent of monthly income

²² <https://www.hoperisinglc.org/indicators/index/view?indicatorId=2365&localeId=254>, access April 23, 2024

Table 5-50 – Housing Problems, 2022

	HH has at least 1 of 4 Housing Problems	HH has at least 1 of 4 Severe Housing Problems	ELI HH has at least 1 of the 4 Housing Problems
Owner	35	20	0
Renter	100	50	40
Total	135	70	40

Source: <https://www.huduser.gov/portal/datasets/cp.html>, accessed June 9, 2026.

ELI = “extremely low income”; HH = “household”

Cost Burden. Table 5-51 reports 2018-2022 CHAS cost burden data for ELI households. For many households and families housing costs are typically the largest, single expense in a family's budget. “As housing costs consume larger proportions of household income, families have less income for nutrition, health care, transportation, education, etc. Severe cost burdens (greater than 50 percent) may induce poverty—which is associated with poor health outcomes for children and adults”.²³ There are two categories of cost burden:

Cost burden – Monthly housing costs (including utilities) exceed 30 percent of monthly income.

Severe cost burden – Monthly housing costs (including utilities) exceed 50 percent of monthly income.

Table 5-51 shows that Blue Lake ELI renter households are experiencing cost burden and severe cost burden at high rates. This condition would also likely apply to ELI owner households if there were any.

Table 5-51 – Rates of Cost Burden for Extremely Low Income Households

	Total Number ELI of Households	Number of Cost Burdened ELI HH	% of ELI HH WHO are Cost Burdened	# of Severely Cost Burdened ELI HH	% ELI HH WHO are Severely Cost Burdened
ELI-Owners	0	0	N/A	0	N/A
ELI-Renters	85	40	47.1%	40	47.1%
Total	85	40	47.1%	40	47.1%

Source: https://www.huduser.gov/portal/datasets/cp.html#query_2006-2020, accessed April 18, 2024. ELI = “extremely low income”; HH = “household”

A comparison of the data in Table 5-50 and Table 5-51 indicates the housing problems reported for ELI households relate to cost burden. Needless to say, the availability of housing units that are affordable to ELI households falls short of the estimated

²³ California Department of Public Health, <https://data.chhs.ca.gov/dataset/housing-cost-burden-2006-2010>, accessed April 19, 2024.

approximately 85 ELI households. Moreover, according to HCD's Building Blocks, ELI households may require specific housing solutions such as:

- Deeper income targeting for subsidies, which means the solution's focus is on housing for those with the lowest incomes. Programs for deeper income target are a housing solution that will aid in addressing the significantly high rate of cost burdened ELI households.
- Housing with supportive services. The income levels and affordability limits of ELI households, as presented in Table 5-48 above, include persons who are unhoused or are risk of homelessness. Supportive services assist the resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community. Supportive services may include intensive case management, medical and mental health care, substance abuse treatment, employment services, and benefits advocacy.²⁴
- Increased variety of housing options (rental and purchase) including for smaller units (e.g., single-room occupancy units), and shared housing.
- Rent subsidies (housing vouchers).

This Housing Element's programs, including the AFFH Action Plan, address other specific local and regional conditions that affect the availability of housing for ELI households:

- A high percentage of ELI renter households are cost burdened; therefore, there is a need to improve opportunities to offset or reduce the cost of maintenance, especially the costs of major repairs, e.g., a new roof, foundation, etc. Opportunities for ELI renter households to improve weatherization can reduce heating and cooling costs, and improve energy efficiency of existing units.
- Historic rates of low housing production.
- Existing regulatory constraints for multifamily development in zones intended for multifamily housing.
- The need to conserve existing housing affordable to ELI renters.

7.0 At-Risk Housing Units

California Government Code § 65583(a)(9) requires an analysis of existing assisted housing developments, if any, that are eligible for conversion from low-income units to market-rate units within the next 10 years. Existing units that are assured to be affordable to lower-income households are considered at risk if the subsidies that assure affordability are set to expire in 10 years or less. If these units cease to be assisted, the property owners may increase unit rents to market rates. Should this occur, low-income housing might be lost, making it difficult for a jurisdiction to meet its goals for providing adequate affordable housing. As specified, "assisted housing developments" refers to multifamily rental

²⁴ See subdivisions (g) and (h) of California Government Code Section 65582.

developments that were constructed using funds from various federal, state, or local programs, local redevelopment programs, community development block grant (CDBG) funds, or local in-lieu fees. Assisted housing developments also include units developed via a local inclusionary zoning ordinance or density bonus units. Where units are assured to be affordable through a local program or via a local agreement, it is likely that the city will be responsible for monitoring the expiration of the city's affordability covenants because the project may not be included in the State's tracking data bases.

A review of the California Housing Partnership affordable housing map shows there are no existing state- or federally- subsidized affordable homes in Blue Lake (<https://calhousingpartnership.org/affordable-housing-map-benefits-calculator/>, accessed April 14, 2026). Nor are there any units in the City that are receiving local redevelopment or in-lieu funds. The City does not have inclusionary zoning or other in-lieu fee housing programs. The City does not have any density bonus qualifying units or units subject to local affordability covenants. Consequently, there are no multifamily housing projects that are considered to be "at risk".

Chapter 6 – Housing Constraints

1.0 Overview

Housing Element law requires the City to analyze and identify potential and actual constraints to the maintenance and development of housing for all income levels, including housing for people with disabilities. The housing element must analyze and identify governmental and non-governmental constraints. Should the analysis identify existing constraints, the housing element must include programs to mitigate the effects.

2.0 Governmental Constraints

2.1 Land Use Controls

Housing Element law requires an analysis of governmental constraints and whether the City's existing regulations constitute an actual or potential barrier to the maintenance, improvement, or development of housing for all income levels, including housing for persons with disabilities. Regulations that may constitute a barrier are assessed to determine whether they pose an actual or potential constraint and whether a barrier would have a disproportionate or negative impact on the development of particular housing types (e.g., multi-family) or on housing developed for low- or moderate-income households. The City must analyze all of the following:

- Land Use Controls
- Processing and permitting procedures
- Fees and exactions
- Codes and enforcement of onsite and offsite improvement standards

2.1.1 General Plan

The City of Blue Lake does not have growth controls. The General Plan establishes goals and policies that guide all new development, including residential land uses. The City does not have additional growth control measures. Targeted updates were made to the Land Use Element of the General Plan in 2021. It presents a general picture of anticipated physical development by describing the existing and desired conditions. According to the Land Use Element, the primary concerns are maintaining the City's rural character and developing a healthy level of economic activity within the constraints of the City's existing physical environment (pgs. 9-10). For each residential land use designation in the General Plan, Table 6-1 below presents the applicable density range, minimum parcel size, compatible zones, and description. A review of Blue Lake's residential land use designations, as listed in Table 6-1, indicates there is a variety of residential designations, from large-lot suburban residential to designations that plan for residential development that is denser and more urban in character. Importantly, the maximum densities of the Mixed Use and Multi-family Residential designations at 18 families per net acre and 24 families per net acre,

respectively, exceed the statutory minimum of 15 dwelling units per acre. The 2021 Land Use Element establishes a near-uniform 6,000-square-foot minimum parcel size for the residential land use designations, including the Mixed Use designation.

Table 6-1 – Blue Lake Residential Land Use Designations

Designation	Density Range	Minimum Parcel Size	Compatible Zones	Description
Low Density Residential (LD)	0 – 4.3 families per net acre	Minimum 10,000 sq. ft. lots	Zones compatible with this designation: Agriculture Exclusive (A-E) and Residential One-Family (R-1-10) and "B" Combining Zone. ¹	Single family residential, in areas where large sites are desirable or necessary due to topography, sewer and water availability, and where livestock may reasonably be permitted.
Moderate-Low Density Residential (MD)	0 – 7.26 families per net acre	Minimum 6,000 sq. ft. lots	Residential One-Family (R-1 and R-1-10); Planned Development Residential (PDR); and Planned Development Combining Zone (P-D).	Single family residential, in urban areas with domestic water and sewer service, etc.
Multi-family Residential (MF)	0 – 24 families per net acre	Minimum 6,000 sq. ft. lots	Residential Two-Family (R-2) and Residential Multiple Family (R-3).	To be applied to land in urban areas with domestic water and sewer service, etc.
Mixed Use	0 – 18 families per net acre	Minimum 6,000 sq. ft. lots	Mixed Use (MU) and Opportunity (O).	A compatible and beneficial mixture of residential and commercial uses in a single structure or on a single or multiple sites. ²

As shown in Table 6-1, the Land Use Element residential density is to be calculated using a parcel's net acreage. However, "net acre" is not defined in the Land Use Element or elsewhere in the Blue Lake General Plan. When calculating a lot's net lot area, it is typical to exclude street rights-of-way and easements from the lot's acreage.

As analyzed below, the Blue Lake Zoning Ordinance (BLZO) establishes maximum density standards for each residential zoning district (see Table 6-5). In contrast to the Land Use Element of the General Plan, the Zoning Ordinance defines Lot Area as "the total horizontal

¹ According to Chapter 17.20, Regulations for the Combining of Zones and for Open Space Lands, of the Blue Lake Zoning Ordinance indicates that "B" Combining Zone has not been adopted.

² "The purpose of the Mixed Use Designation is to allow for the compatible and beneficial mixture of residential and commercial uses in a single structure or on a single or multiple sites. Mixed Use districts are designed to achieve a convenient business and residential environment in areas where multiple activities and an increased degree of pedestrian orientation are considered desirable. The MU designation is intended for areas which are suitable for a mixture of commercial and residential land uses such as the City Center area and properties which front on Blue Lake Blvd."

area included within the lot lines". This is a description of how to calculate a parcel's gross acreage. Like the General Plan, the BLZO does not define density. It is the City's practice to calculate residential density in accordance with the Zoning Ordinance's definition of Lot Area, that is, gross acreage. Additionally, the City's usage of gross density implements and is consistent with paragraph (6) of § Government Code 655915(o) which instructs how residential density is determined:

the greatest number of units allowed under the zoning ordinance, specific plan, or land use element of the general plan, or, if a range of density is permitted, means the greatest number of units allowed by the specific zoning range, specific plan, or land use element of the general plan applicable to the project. Density shall be determined using dwelling units per acre.

This inconsistency between the General Plan and Zoning Ordinance regarding net density vs. gross density is a potential barrier to the development of multi-family housing types, and Program HI-x has been incorporated to resolve this vertical inconsistency between the Land Use Element and BLZO and to improve transparency.

Programs HI-6(A) and HI-6(B)

Program HI-6(A) commits the City to amending the description of the land use designations in the General Plan Land Use Element to replace net acreage with gross acreage and to add a definition of density to the Land Use Element and BLZO. This program will ensure gross acreage is used as the basis for residential density calculations by resolving the current inconsistency between the Land Use Element's use of net acreage and the BLZO's use of gross acreage (per the definition of Lot Area).

Additionally, to improve transparency and remove ambiguity for the City, the public, property owners, and developers, Program HI-6(B) commits the City to adding language to the Land Use Element and Zoning Ordinance indicating that non-density bonus project, if the density calculations that result in fractional units of less than 0.50 shall be rounded down to the next whole number, and those resulting in 0.50 or more shall be rounded up to the next whole number ; however, accessory dwelling units and junior accessory dwelling units shall be excluded from density calculations consistent with State law.

Table 6-2 provides counts and acreages for the four residential land use designations from Table 6-1. It shows that the Moderate-Low Density and Mixed Use designations have the highest counts and acreages of vacant parcels; however, this data is not filtered for Blue Lake's environmental constraints, which are analyzed in Chapter 7. There is less than one acre of vacant lands planned for MF, although there are more than 40 acres of Mixed Use which does allow multi-family development.

Table 6-2– Summary of Residential Land Designations

General Plan Land Use Designation	Count of All APNs	Total Acres of Land Use Designation (ac)	Count of Vacant APNs	Total Acres of Vacant APNs (ac.)
Low Density Residential (LD)	14 APNs	10.4	1 APN	0.06
Moderate-Low Density Residential (MD)	413 APNs	144.2	32 APNs	44.7
Multi-family Residential (MF)	40 APNs	8.6	7 APNs	0.65
Mixed Use	23 APNs	51.7	14 APNs	40.7

Assessor Parcels are categorized as “vacant” if the Assessor’s improvement value equals \$0.00.

2.1.2 Residential Zoning Districts and Standards

Every city in California has an existing zoning ordinance. In general, zoning is the division of a city into districts and the application of different regulations in each district. State law delegates to cities control over zoning matters while ensuring uniformity of, and public access to, zoning and planning hearings, although State law may limit or preempt local zoning control. A city’s zoning map and zoning text are the two components of a city’s zoning regulations. The City of Blue Lake exercises its authority over the residential development entitlement process by implementing the zoning (Title 17) and subdivision (Title 16) ordinances of its Municipal Code. These ordinances establish development standards to regulate all residential construction in a manner that is generally consistent with the General Plan. Development standards are 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.

This analysis found the following actual and potential constraints to residential development:

- The regulations within specific zoning districts and combining zones.
- The availability of land within specific zoning districts.

Blue Lake’s residential zoning districts and the stated intent, or purpose, of each zoning district are presented in Table 6-3 below:

Table 6-3 – Residential Zoning Districts

Abbreviation	Zoning District	Zoning District Intent or Purpose
R-1	Residential One-Family	The R-1 Zone is intended to be applied in single-family home development in areas of the City in which topography, access, utilities and public services make residential density living both suitable and desirable.

Abbreviation	Zoning District	Zoning District Intent or Purpose
R-2	Residential Two-Family	The R-2 Zone is intended to provide and encourage a suitable environment for urban family living and to apply in areas of the City where it is reasonable to permit and protect medium density development.
R-3	Residential Multiple Family	The R-3 Zone is created to provide an environment for apartment development and higher residential uses and to provide for residences in mobile home parks and for professional offices.
PDR	Planned Development Residential	PDR Zone is intended to permit a more creative approach in the residential development of land resulting in a more efficient, attractive, desirable use of open area; to permit flexibility in design, including pedestrian and vehicular pathways, and placement of off-street parking areas. The PDR Zone is further intended to realize the best potential of the sites characterized by special features of shape, topography, or size.
MU	Mixed Use	The MU Zone is intended to allow for the compatible and beneficial mixture of residential and commercial uses in a single structure or on a single or multiple sites in a manner consistent with the City's General Plan goals and policies. These districts are designed to achieve a convenient business and residential environment in areas where multiple activities and an increased degree of pedestrian orientation are considered to be desirable. Residences in the Mixed Use Zone provide housing near sources of employment or commercial and professional services—an alternative to exclusively residential zones. New structures and additions to existing structures shall be required to meet specific design standards.
O	Opportunity	1. The O Zone is intended to allow for the compatible and beneficial mixture of commercial, manufacturing, and residential uses in a single structure or on a single or multiple sites in a manner consistent with the City's General Plan, goals and policies. 2. This zone is intended to encourage a live-work type environment. 3. This zone encourages craft-type manufacturing businesses and retail commercial spaces on the ground floor of structures with multi-family residential development units located above or behind commercial or manufacturing spaces. 4. This zone is designed to achieve a convenient business and residential environment in areas where multiple activities and an increased degree of pedestrian orientation and open space are considered to be desirable. 5. New structures and additions to existing structures shall be required to meet specific design standards. 6. Land uses in this zone shall be required to meet specific performance standards.

While the Retail Commercial (RC), Service Commercial (SC), and Highway Commercial (HC) zones permit residential uses, residential development requires the approval of a

conditional use permit and the demonstration that the residential use is secondary to a commercial use; therefore, these three zones are not considered to be residential zoning districts.³

Table 6-4 provides counts and acreages for the six residential zoning districts listed in Table 6-3. It shows that while the R-1 zoning district has the highest count of APNs, it is the Opportunity zone (or O zone) that has the most vacant acreage altogether at 12.3 acres, followed by the PDR zoning district. The O zone and PDR zone comprise 56% and 33%, respectively, of the City vacant land. The data indicate low availability of land zoned R-2 and R-3: a total of 6.23 acres across 28 parcels, of which there are four APNs totaling 0.32 acres are vacant. The availability of vacant land by zoning district is illustrated in Figure 1. It is noted that the data in Table 6-4 is not filtered for Blue Lake’s environmental constraints, which are analyzed in Chapter 7. Nonetheless, Table 6-4 and Figure 1 show that the availability of vacant residential land is concentrated in the O zone and PDR zone.

Table 6-4 – Summary of Residential Zoning Districts

Principal Zoning District*	Count of All APNs	Total Acres of Zoning District (ac)	Count of Vacant APNs†	Total Acres of Vacant APNs (ac.)
R-1	303	68.8	14	1.74 ac.
R-2	14	2.26	2	0.10 ac.
R-3	14	3.97	2	0.22 ac.
PDR**	109	47.7	15	7.20 ac.
MU	38	8.08	5	0.37 ac.
O	21	23.3	12	12.31 ac.

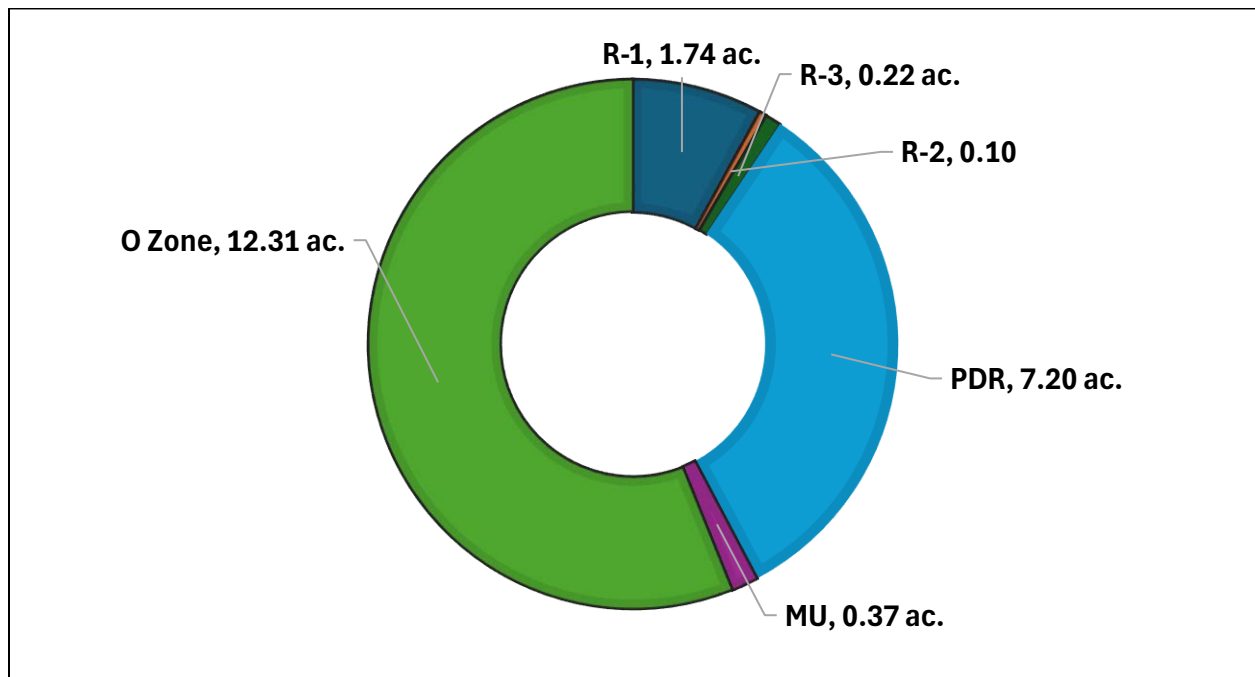
* Assessor’s Parcel Numbers (APNs) that have more than one zoning district and/or have a Combining Zone are counted.

** Excluded from this data are three parcels of land that total nearly 36 acres and are held in trust for the Blue Lake Rancheria. Also excluded is a 0.08 ac parcel owned by the City, which appears to be related to the MH park entitlements.

† APNs with an Assessor’s improvement value equal to \$0.00 are assessed as vacant.

³ These zones, however, are eligible for siting of supportive housing and low barrier navigation centers in accordance with Government Code §§ 65650 and 65650.

Figure 1 – Vacant by Zoning District



A. Zoning Standards

This section describes the Blue Lake Zoning Ordinance (BLZO) standards and requirements for residential development, including densities, setbacks, heights, and other relevant requirements. Table 6-5 below presents the City's existing setbacks, lot sizes, densities, and permitting requirements for principal zones that permit residential development; however, proposed amendments are not noted. The City adopted the 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.

It is acknowledged that some of the City's current development standards have the potential to result in a decreased supply of housing and 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.

Table 6-5 – Existing Residential Zoning Standards

Principal Zones and Dwelling Types	Use Permit	Site Plan Approval	Minimum Lot Area	Maximum Lot Coverage	Max. Density Un/SF	Setbacks F-R-S*	Maximum Height	Yards for Dwelling Groups
R-1			6,000 SF	40%	1/6,000	15-20(max)-4	35 feet	
Single-Family	No	No						
Two-Family	Yes	Yes						
R-2			6,000 SF	60%	1/2,500	20-15(max)-4	35 feet ⁵	
Single-Family	No	Yes						
Two-Family	No	Yes						⁴ Yes, see below
R-3			6,000 SF	60%	1/2,000	15-10-5	45 feet	
Single-Family	No	Yes						
Two-unit	No	Yes						⁴ Yes, see below
Multi-unit (≤4)	No	Yes						
Multi-unit (5+)	Yes	Yes						
PDR			6,000 SF	40%	1/6,000 ¹			
Single-Family	No	Yes				15-20(max)-4	35 feet	
Two-unit and Three-unit	Yes	Yes				25-25-10	30 feet	Not specified
Multi-unit (4+)	Yes	Yes				25-25-10	30 feet	Not specified
MU			6,000 SF	60%	1/2,500	15-20(max)-4	35 feet ³	
Single-Family	No	No						
Multi-Unit (≤4)	No	Yes						
Multi-Unit (5+)	Yes	Yes						

Principal Zones Dwelling Types	Use Permit	Site Plan Review	Minimum Lot Area	Maximum Lot Coverage	Max. Density Un/SF	Setbacks F-R-S*	Maximum Height	Yards for Dwelling Groups
O			15,000 SF	70%		Variable ²	35-45 feet	Not specified
Residential: ≤4 units that are ≥2 bedrooms: must be located above the ground floor	No	Yes		Additionally, residential units cannot exceed 35% of the floor area of a structure	1/2,500			
Residential: ≤8 units that are 1-bedroom units: must be located above the ground floor	No	Yes		Additionally, residential units cannot exceed 35% of the floor area of a structure	1/1,250			
Multi-Unit (5+): units can be located on the ground floor but cannot exceed 50% of the floor area of the ground floor.	Yes	Yes		Additionally, residential units cannot exceed 65% of the floor area of the structure	For ≥ 2-bedroom units: 1/2,500; for 1-bedroom units: 1/1,250			

* “F-R-S” means front, rear, and side.

1 Unless modified by D combining zone

2 Setbacks are required from Powers Creek, the creek trail, the public rights-of-way, and the Blue Lake Rancheria.

3 Program HI-19 of the Blue Lake’s 6th Cycle Housing Element commits the City to amending the R-2 and MU Zones to remove the limitation on the number of building stories. This amendment will make the R-2 and MU building height standards consistent with other zones that allow multi-family housing.

4 Yards for Dwelling Groups: The distance between separate buildings of a dwelling group shall not be less than 10 feet. The distance between the front of any dwelling unit in the group and any other buildings shall not be less than 20 feet. The distance between the front of any dwelling unit in the group and any side lot line shall not be less than 12 feet. All of the above distances shall be increased by two feet for each two feet that any building on the lot exceeds two stories.

While these standards generally apply to all developments, there is an opportunity to modify the principal zone standards to address site-specific design constraints associated with topography or sensitive resource areas. The principal zone standards may be modified by 1) applying the Planned Development (P-D) and/or Special Density (D) combining zones; 2) by requesting exceptions as part of the use permit process as allowed in the MU and O zones; 3) requesting a variance; and 4) 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 and waivers as allowed under the State Density Bonus Law. The Planned Development and Special Density Combining Zones are discussed further below.

B. Planned Development Residential or PDR Zone

The 6th Cycle Housing Element identified several PDR standards as constraints. Program HI-19 commits the City to preparing and adopting specific amendments that address those constraints. This evaluation builds on the 6th Cycle evaluation and program to ensure the existing regulatory barriers are removed from the PDR Zone. As presented in Table 6-4, of the City's six residential zoning districts, approximately 33% of the City vacant land is zoned PDR (although this data is not filtered in this chapter for environmental constraints).

The 6th Cycle Housing Element identified the PDR zone's development standards (i.e., setbacks, lot coverage, and height limits) for multi-family development that are more restrictive than those in the R-2 and R-3 zones. Program HI-19 was included in the 6th Cycle Housing Element to remove the identified potential constraints that are specific to multi-family development. More specifically, Program HI-19 committed 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).

Because completion of Program HI-19 is in-progress at the time of preparation of this Housing Element update, it will be carried forward. It is recommended that it be augmented to address all of the following additional potential regulatory constraints that have been identified below:

- The subjective language of the PDR zone's purpose.
- The lack of flexibility in the application of the 6,000 square foot minimum lot size.
- Subjective findings.

Subjective language of the PDR zone's purpose. The Planning Development Residential Zone, or PDR, is a principal zoning district in the Blue Lake Zoning Ordinance. The stated purpose of the PDR Zone is

“...to permit a more creative approach in the residential development of land resulting in a more efficient, attractive, desirable use of open area; to permit flexibility in design, including pedestrian and vehicular pathways, and placement of off-street parking areas”.

The existing PDR purpose/intent language is subjective and does not contain objective guidance. For a residential development that requires approval of a use permit, the subjective language is a potential constraint because use permit findings typically require a project be evaluated for consistency with the zone’s purpose/intent. Blue Lake’s use permit approval findings are codified in § 17.28.030, are typical for this type of discretionary permit, and include the following finding:

1. 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. (emphasis added)

The PDR zone’s absence of objective language in its purpose statement has the potential to create ambiguity and uncertainty when evaluating whether a conditionally permitted housing development “is in accord with...the purpose of the zone”. This uncertainty can make use permit findings harder to defend and to apply consistently.

Lack of flexibility in the application of the 6,000 square foot minimum lot size. As stated above, the purpose of the PDR Zone is to provide for creativity, including in the content of open space, and where there are special features of shape, topography, or size. However, the PDR lacks provisions that allow flexibility or reductions in the 6,000-square-foot minimum lot size to encourage clustered development designs that simultaneously avoid hazards and protect sensitive resources (where present) and avoid parcelization of those hazards and resources. While the density may be increased by adopting and applying a D Combining Zone, as discussed in section 2.1.2(D) below, neither the PDR Zone nor the Zoning Ordinance provides a pathway to decrease the 6,000 square foot minimum lot size. This lack of lot size flexibility appears to be inconsistent with the PDR Zone’s stated purpose “to permit a more creative approach in the residential development of land resulting in a more efficient, attractive, desirable use of open area; to permit flexibility in design”. The lack of lot size flexibility forecloses opportunities to create smaller parcels that can be sold, leased, or financed to accommodate special features or sensitive resources on a property. This may increase the likelihood of sensitive resources being divided rather than consolidated into a single unit to be managed holistically. With respect to housing, the lack of lot size flexibility limits opportunities for common interest developments that may feature smaller housing units, including naturally more affordable ownership options such as bungalow courts and townhomes.

Subjective Findings. The existing findings may limit the range of housing types and tenures. Only traditional detached single family residences are enumerated in the PDR Zone as a principally permitted housing type, although development is subject to the Site Plan

Approval process. The PDR Zone enumerates other housing types that may be more affordable and increase the variety of housing to meet the community's needs (i.e., duplexes, triplexes, and multi-family). However, these other housing types require approval of a use permit. In addition to the conditional use permit findings (evaluated below), the PDR Zone includes additional findings for other housing typologies by also requiring a use permit for other housing beyond a single-family dwelling (see § 17.16.080.D.4.b):

- i. The combination of dwelling types, lot sizes, and uses in the planned development will complement each other and will harmonize with existing and proposed land uses in the vicinity.
- ii. The development standards will produce an environment of sustained desirability and stability, harmonious with the character of the surrounding area and consistent with the objectives of the Blue Lake General Plan and other applicable plans or policies adopted by the City Council.

These findings are subjective and do not offer guidance or approval certainty for property owners and developers, and are a potential constraint to the development of a variety of housing types and tenures, including small-scale and denser housing types, for all income levels. The existing PDR Zone regulations outlined above act as a constraint on housing development because all types of residential development require discretionary approval; the standards and findings of the PDR Zone are subjective and do not offer approval certainty; and while the purpose of the PDR Zone is to provide flexibility, the standards do not offer flexibility without subjective discretionary approval, suggesting internal inconsistency within the zone itself. Program HI-3 carries forward the 6th Cycle's Program HI-19, and expands the scope of the amendments to address the PDR zone's constraints as identified.

Program HI-3

This program continues and modifies 6th Cycle Program HI-19 by committing the City to amend the PDR Zone to replace subjective standards (including Zoning Ordinance regulations that are cross-referenced) and procedures with objective standards and procedures for residential development, while not imposing new burdensome requirements. Additionally, the findings for approval are to be amended to provide for approval certainty. The amendments should allow for flexible lot sizes for projects that implement clustering residential development to protecting sensitive resources and avoiding hazards, and that implement objectives of the General Plan, including the Housing Element, without requiring a rezoning. Other modifications include a commitment that the City will explore expanding by-right housing types to include missing middle housing types, such as duplexes, triplexes, fourplexes, courtyard buildings, bungalow courts, cottage housing, and townhouses, to provide workforce housing.

C. Availability of Land for Residential Development

Chapter 7 “Sites Inventory” of this Housing Element demonstrates that the City of Blue Lake has an adequate supply of land that is appropriate, suitable, and available to meet its 7th Cycle RHNA, including all of Blue Lake’s lower-income RHNA. However, there is an overall limited supply of land that allows by-right small-scale denser multi-family development, i.e., up to four households as the primary use and without a discretionary permit:

- The R-2 and R-3 zones specifically enumerate by-right multi-family development without having a mixed-use requirement. The supply of land zoned R-2 and R-3 is less than 6.5 acres, of which there are four vacant parcels that total 0.32 acres, as indicated in Table 6-4.
- There is supply of land zoned PDR. The PDR Zone’s maximum allowable density and permitted housing types indicate it is essentially a single-family zoning district:
 - o Maximum density of the PDR zone is 7.26 dwelling units per acre (or 8 units per acre when rounded up), which is the same as the R-1 zone.
 - o Housing configured as duplexes and greater, including missing middle types is subject to discretionary permitting under the existing regulations.
- While there is a supply of land in the Opportunity Zone, this is a mixed use zone that enumerates multi-family housing as a primary and compatible use; however, a variety of non-residential commercial and light industrial uses are also permitted.

To facilitate and encourage more diverse housing opportunities throughout the City by improving the supply of land in the R-2 and R-3 zones, the Housing Element includes Program HI-10.

Program HI-10

This program is to encourage the development of a variety of housing types and tenures for all income levels by increasing the supply of sites suitable for housing. This program will help address the limited availability of rental and ownership housing that is affordable to the local workforce by the City offsetting the costs to upzone eligible properties to either the R-2 or R-3 zones. Property owner participation is strictly voluntary.

D. Combining Zones

The City of Blue Lake has several combining zones that modify the regulations of the principal zone with which they are combined (§ 17.20.010 BLZO). Combining zones, sometimes called overlays, add specialized regulations, development standards, and/or use restrictions on top of the underlying principal zone. Combining zones are typically established by amending the text of the jurisdiction’s zoning ordinance and zoning map. While these combining zones offer improvements to the strict application of the development standards of the principal zones, both require completion of the legislative process, which can be lengthy and costly, and adoption is uncertain.

Special Density (D) Combining Zone. Section 17.20.040 of the BLZO allows, on a parcel-by-parcel basis, the principal zone's maximum density to be increased by the adoption of a Special Density or D Combining Zone, which is accomplished by amending the Zoning Map.⁴ The highest density allowed by the D Combining Zone is one dwelling unit per 3,000 square feet, or 14.5 dwelling units per acre (or 15 dwelling units per acre when rounded up). Paragraph A of § 17.20.040 of the Special Density Combining Zone explicitly prohibits a decrease in the minimum parcel size, "In no case shall the D Combining Zone be applied so as to allow the creation of lots smaller than the minimum lot size specified by the principal zone." Based on a review of the Zoning Ordinance, there are no other regulatory pathways that allow for a reduction of the principal zone's minimum lot size, which is 6,000 square feet for nearly all residential zones as reviewed above. The inability to accommodate smaller parcel sizes to accompany an application of the Special Density Combining Zone density to a site may be a potential barrier to the creation of a greater variety of housing types and tenures, including affordable ownership housing, as the minimum parcel size is fixed.

Program HI-6(C)

This program commits the City to exploring amending the Special Density (D) Combining Zone to include allowances for smaller parcel sizes as part of the application of the D Combining zone to a site for projects create of a variety of housing types, including those for the development of affordable workforce units or affordable ownership housing.

Planned Development (P-D) Combining Zone. A developer may elect to use the City's P-D Combining Zone to facilitate the development of their project. The P-D Combining Zone is intended for large sites, with a minimum site area of 2 acres per § 17.20.020.D. According to the American Planning Association:⁵

the early stages of the planned unit development process is intended to provide a comprehensive development review that could overcome the shortcomings of zoning and subdivision regulation, improve project design, and provide for common open space in return for "clustering" development elsewhere in the project at increased densities.

For a developer to take advantage of the flexibility and approval certainty offered by the P-D Combining Zone, the Zoning Map must be amended to adopt the P-D Combining Zone for a specific site, and a use permit for the entire project must be approved concurrently. Blue Lake's P-D Combining Zone requirements and standards are typical. It is the City's

⁴ A combining zone is an overlay zone that modifies the regulations of the principal zones with which it is combined. Establishing a combining zone for a specific parcel of land requires the adoption of an ordinance amending the zoning map.

⁵ Mandelker, Daniel R., Planned Unit Developments, the American Planning Association Planning Advisory Service Report Number 545, March 2007, pg. 2.

assessment that the existing P-D Combining Zone is not a potential or actual constraint to residential development.

Multifamily (MF) Combining Zone. The MF Combining Zone was adopted by the City of Blue Lake in December 2025. It is intended to be combined with the Residential Multiple Family (R-3), Mixed-Use (MU), Opportunity (O), and Planned Development Residential (PDR) zones to facilitate multi-family housing for a variety of income levels, including when the provisions of Government Code § 65583.2(c) are triggered.⁶ Multifamily development with at least 20% of the units affordable to lower-income households is incentivized on properties where the MF Combining Zone is adopted because it is permitted by-right, is not subject to the City's Site Plan Approval procedures, and the City's approval is ministerial. It is the City's assessment that the existing MF Combining Zone is not a potential or actual constraint to residential development.

E. Parking Requirements

The City's parking requirements vary according to the type of dwelling unit, as shown in Table 6-6. Generally, requirements for on-site parking add development costs for constructing parking spaces, ongoing maintenance, and the physical area they occupy, which preclude other uses.

Table 6-6 – Schedule of Off-Street Parking Requirements for Residential

Type of Land Use	Number 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

To ensure that off-street parking requirements do not inhibit the development of housing in the City, § 17.24.100.B.4 of the BLZO 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. Generally, the City's waiver criteria are tied to community benefit. Most projects in the City can meet one or more of the above criteria to receive a parking waiver. Since the City provides an

⁶ Specifically, the requirement governing the reuse of a Housing Element site inventory site for consecutive planning periods.

administrative approval process for parking waivers, off-street parking requirements are not considered a constraint to residential development.

It is noted that “second units” are specified as a type of use for parking. State law changed the terminology from second units to accessory dwelling units in 2017. The City understands that State law specifies that any local ordinance that does not meet current statutory requirements is considered null and void, and it is the City’s practice to apply the State standards directly to the development of ADUs and JADUs, including the restrictions on imposing off-street parking requirements.

While the City develops a local density bonus (anticipated to follow the March 2026 State Density Bonus Law Sample Ordinance Template) as part of implementing the 6th Cycle Housing Element Program HI-1, it is the City’s practice to apply State Density Bonus Law directly. The City is aware that density bonus projects are entitled to parking reductions and that no off-street parking may be required for certain projects (e.g., special-needs housing, supportive housing). The City’s off-street parking standards for emergency shelters and residential care facilities are reviewed in section 2.2.9.

Programs HI-2(A) and HI-9

To improve the visibility of the City’s off-street parking waiver process, Program HI-9 commits the City to developing and maintaining publicly accessible information (e.g., the regulations, recent examples of successful applications, and application materials) on the City’s website.

Program HI-2(A) commits the City to adding language to its off-street parking requirements in § 17.24.100.B that clearly states that State ADU/JADU law governs off-street parking requirements.

2.1.3 Processing and Permitting Procedures

Processing and permit procedures can pose a considerable constraint to the production and improvement of housing. Common constraints include lengthy processing time, unclear permitting procedures, layered reviews, multiple discretionary review requirements, and costly conditions of approval. These constraints increase the final cost of housing, uncertainty in the development of the project, and overall financial risk assumed by the developer. While a number of zoning districts state that specific residential development is allowed by-right (e.g., single-family residences in the R-1 zone), most residential development is subject to the City’s Site Plan Approval process. Table 6-7 summarizes the typical processing timeline for various City permits and entitlements, and Table 6-8 provides an overview of the typical processing procedures by project type. The City’s Site Plan Approval and Use Permit procedures, findings, and process are reviewed below.

Table 6-7 – 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
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

* From the point in time when the application is deemed complete.

Table 6-8 – 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

A. Site Plan Approval

The City of Blue Lake's Site Plan Approval is a design review type process. It is required as part of the use permit process or when it is specifically required in a zoning district for principally permitted uses. Site Plan Approval is a discretionary process and is required for most residential development on vacant residential sites, as indicated in Table 6-5. As indicated in Table 6-7, the Site Plan Approval process typically takes approximately 1-2 months once an application is deemed complete, and most residential development does not trigger further CEQA evaluation.

Section 17.24.250 of the Zoning Code lists the requirements for Site Plan Approval, which includes the "Principles to Be Followed" for Planning Commission review of a project. The 6th Cycle Housing Element reviewed the Principles to Be Followed and determined they include provisions that are subjective, which is inconsistent with subdivision (f) of the Government Code § 65589.5. To address this inconsistency, Program HI-21 was included in the City's 6th Cycle Housing Element. This program commits the City to replacing the subjective review criteria for the Site Plan Approval process (i.e., "Principles to Be Followed"

in Zoning Ordinance § 17.24.250(F)) with objective standards as defined by State Housing Law. In addition to implementing Program HI-21's amendments, additional amendments are needed to § 17.24.250 to replace the Site Plan Approval's intent language (below), which is subjective and inconsistent with State Housing Law:

The purpose of this regulation is to promote Blue Lake's orderly and harmonious development, the stability of land values and investments, and in order to help prevent excessive and unsightly grading of hillsides and removal of vegetation or the erection of structures of unsightly appearance. Applications for development permits shall be reviewed by the Planning Commission. Blue lake Zoning Ordinance § 17.24.250

With the exception of single-family structures in the R-1 and MU Zones, and ADUs and JADUs, the City's Site Plan Approval process is required for most residential development. BLZO Section 17.24.260 contains objective development standards for single-family residences that are reviewed for consistency by City staff when a building permit referral is received, but these are not applied to ADUs (these regulations are review in section 2.2.2 below). Otherwise, the City's Zoning Ordinance does not provide regulatory procedures for by-right residential development, even when a use is enumerated as a principal permitted use, complies with City standards, and is not located on a site with environmental constraints. A "use by-right" is defined in subdivision (i) of Government Code § 65583.2, and means the jurisdiction shall not require:

- A conditional use permit.
- A planned unit development permit.
- Other discretionary, local-government review or approval that would constitute a "project" as defined in Section 21100 of the Public Resources Code (California Environmental Quality Act "CEQA").

Because most zoning districts and most housing types are subject to Site Plan Approval, it is an actual regulatory barrier and constraint on the development of a variety of housing types and tenures across all income levels. Program HI-4 is included to address this regulatory constraint.

Program HI-4

This program commits the City to preparing and adopting a by-right residential development regulatory procedure that allows residential development to be principally permitted (by right) without discretionary review when the proposed development complies with all applicable objective City development standards and is located outside of an environmentally sensitive areas (e.g., stream buffers). The objective standards shall not be overly burdensome, and provide for a variety of housing types, tenures, and income levels. This regulatory procedure shall be available in the R-2, R-3, PDR, MU, and O zoning districts.

B. Conditional Use Permit Findings

According to the American Planning Association, “local governments establish conditional uses as a technique in the zoning ordinance for flexibility and because special standards are sometimes required for desirable uses. There are often uses that would be welcome within the zoning district if additional standards could prevent them from undermining the purpose and intent of the district.”⁷ The use permit is the discretionary zoning approval for a conditional use. The “conditional” part means the local planning authority (e.g., Planning Commission) grants the permit subject to specific requirements designed to protect surrounding properties and the community.⁸ The local government’s use permit regulations include findings that align with statute and case law. Blue Lake’s use permit approval findings are in § 17.28.030, and are typical for this type of discretionary permit:

1. 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.
Subsection 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.
2. 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.

Table 6-3 above includes each zoning district’s stated purpose. The purpose of nearly all residential districts includes subjective language. For example, the purpose language for both MU and O Zones is nearly identical: “to allow for the compatible and beneficial mixture of residential and commercial uses”. When the use permit finding *that the proposed location of the conditional use be in accord with the purpose of the zone* is to be analyzed in the context of the subjective intent/purpose language of a zoning district, it creates ambiguity and uncertainty for ascertaining when a conditionally permitted housing development “is in accord with the purpose of the zone”. This uncertainty can make use permit findings harder to defend and to apply consistently. Although it may be considered an abuse of discretion by a decision making body to deny a 100% residential project in the MU or O zones should a housing development project to be found inconsistent with the intent/purpose of the zone, it remains a deterrent. Addressing this existing subjective language may encourage the application of the MU Zone and O Zone existing provisions for exceptions through the City’s existing use permit process. Completion of Program HI-5 will remove regulatory barriers by replacing the existing subjective language in each residential and mixed-use zoning district’s purpose statement and by initiating and completing

⁷ Zoning Practice, <https://www.planning.org/publications/document/9027798/>, American Planning Association, May 1, 2026

⁸ <https://permitplace.com/what-is-a-conditional-use-permit/>, accessed June 14, 2026.

regulatory and procedural improvements to increase approval certainty for residential development subject to a use permit.

Program HI-5

This program commits the City to undertaking the regulatory and procedural improvements to increase approval certainty for residential development subject to a use permit, such as:

- Replace any existing subjective language in each residential zoning district's purpose statement with objective language.
- Translating intent of the findings into objective criteria. This could be a decision matrix or scoring system tied to General Plan and density compliance; defining what constitutes "accord with the zone purpose".
- Adopt a uniform set of objective findings for housing-related use permits.
- Create a special use permit process or overlay standards specifically for housing that provides a streamline pathway for qualifying projects.
- Adopt an internal and public-facing guidance manual explaining how to interpret zone purpose statements.

C. Variance

Blue Lake Zoning Ordinance § 17.28.020 allows for variances to the development standards where the Planning Commission is able to make either of the findings below. The Planning Commission considers a variance following a noticed public hearing.

- 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 City's variance procedures and findings to grant a variance are typical of many California cities and counties, are consistent with State law, and do not constitute a regulatory barrier to the construction or maintenance of housing.

A. Design Review Procedure

Section 17.16.120 of the Zoning Ordinance contains another design review procedure, titled Design Review Procedure. According to subsection C.1, this procedure applies to structures listed on the Blue Lake Historical Building Register and to real property subject to a historical zoning overlay. Subsection C.2, however, grants the “City Planner or Mayor discretion to refer other development projects to the Planning Commission for review and comment when in their judgment the projects might have a significant impact on the aesthetic character of the City.” Although the Planning Commission’s review and input are advisory, the trigger for invoking this procedure is vague and subjective. This provision has not been invoked by either the Mayor or City Planner since at least 2000; however, it remains a potential regulatory barrier because it can increase the time and cost of permitting a housing development.

Program HI-6(D)

As part of removing development constraints and barriers, Program HI-x commits the City to either adding qualifying language that expressly exempts housing developments from subsection C.2 of BLZO § 17.16.120, or striking C.2 of BLZO § 17.16.120 entirely.

B. Special Study Zones

Section 17.24.160 of the Blue Lake Zoning Ordinance gives the Planning Commission the authority to establish a Special Study Zone when there are unusual or unique situations occur and when the Planning Commission makes a determination in regards to the existence of such a situations. The examples of unusual or unique situations cited in § 17.24.160 are “...hillside lot development, new housing concepts.” It is unclear whether the Planning Commission follows a legislative process to establish a Special Study Zone; nor does § 17.24.160 elaborate on the possible outcome of establishing a Special Study Zone; ostensibly, it would impose additional requirements. Given the subjectivity of “new housing concepts” language and the potential to conflict with State housing law, Program HI-6(E) has been included to remove this potential barrier.

Program HI-6(E)

This program commits the City to striking the language of “new housing concepts” from § 17.24.160 to remove this potential barrier because, if applied, it is likely to be inconsistent with State law.

C. Density Bonus Provisions

State Density Bonus Law (SDBL) requires the provision of certain incentives for residential development projects that set aside a certain portion of the units to be affordable to lower- and moderate-income households. SDBL aims to encourage the development of affordable housing by providing housing developers with certain incentives such as increasing density above the maximum allowed on the site by the local zoning, reductions in local parking standards, concessions to reduce project costs, and reductions or waivers of applicable

development standards. SDBL is regularly amended and, in recent years, has been updated nearly every year. The amount of density bonus granted varies depending on the percentage of affordable units provided and ranges from 5 percent to 50%. Cities and counties are also required to provide up to five additional incentives; relief, via waivers, from development standards that physically preclude development of the project at the density; and reduction in parking standards.

SDBL requires cities and counties to adopt a local density bonus ordinance that meets state requirements. Jurisdictions must implement their local ordinance in compliance with SDBL. Even without such an ordinance, cities and counties must provide developers the benefits to which the law entitles them.⁹ While the City does not have a local Density Bonus ordinance, it is the City's practice to apply State Density Bonus Law directly from State law. During the 6th Cycle, the City did not receive any density bonus requests. Although as part of reviewing a potentially eligible project, the City notified the developer of the potential to use concessions and waivers for exceptions to applicable development standards as allowed under SDBL.

Program HI-2(I)

To meet the statutory requirement that the City establish a local density bonus ordinance, this program commits the City to establishing local density bonus procedures consistent with SDBL. The City may elect to adopt HCD's sample ordinance released in March 2026. Program HI-2(I) is a continuation of 6th Cycle program HI-1.

2.2 Provisions for a Variety of Housing

Housing element law require the housing element to provide for a variety of housing types including multi-family rental housing, factory-built housing, mobile homes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, transitional housing, housing for persons with disabilities, and accessory dwelling units. Providing development opportunities for a variety of housing types promotes diversity in housing price, tenure, style, and size, and encourages the development of various types of housing for all economic segments of the population. It contributes to neighborhood stability by offering more affordable and move-up homes and accommodating a diverse income mix. Table 6-9 summarizes the different housing types permitted or conditionally permitted in the City's zones that allow residential development. Each of these housing types is described below, including how it is regulated by the City's Zoning Ordinance. Any programs proposed to comply with State housing law or remove potential constraints to the development of housing are noted.

⁹ <https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/housing-law-fact-sheets.pdf>, accessed July 10, 2026

Table 6-9 – Housing Types Permitted by Zoning District

Housing Types Permitted	R-1	R-2	R-3	PDR	MU	O	AE
Single Family Dwelling	P	P	P	P	P	P	P ⁴
Two-Family Dwellings	CUP	P	P	CUP	P	P	--
Three-Family Dwellings	--	--	P	CUP	P	P	--
Four-Family Dwellings	--	--	P	CUP	P	P	--
Multi-family (5+ Units)	--	--	CUP	CUP	CUP	CUP	--
Rooming and Boarding Houses	--	CUP	CUP	CUP	CUP	--	--
Rest Homes	CUP	--	--	CUP	--	CUP	--
Mobile home parks	--	--	CUP	CUP	--	--	--
Manufactured Homes on Individual Lots ⁵	P	P	P	P	P	P	P
Accessory Dwelling Unit and Junior Accessory Dwelling Unit ⁶	P	P	P	P	P	P	P
Supportive Housing ⁷	P	P	P	P	P	P	P
Transitional Housing ⁷	P	P	P	P	P	P	P
Emergency Shelter	--	--	--	--	--	P	--
Single Room Occupancy Housing	--	--	--	--	--	--	--

“P” = Principally Permitted; “CUP” = Conditional Use Permit; “—” = Use Not Allowed

¹ When secondary to a commercial use in RC and SC zones.

² When 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 and junior accessory dwelling units in any zone that allows a single-family residence, and accessory dwelling units are allowed on parcels with existing multi-family development, and proposed multifamily development subject to certain criteria.

⁷ State law requires supportive housing and transitional housing to be permitted in the same manner as other residential uses and structures in the same zone.

2.2.1 Accessory Dwelling Units

Section 17.24.270 of the Zoning Ordinance 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. However, it contains numerous inconsistencies with State ADU law, and does not provide for junior accessory dwelling unit (JADU) development. As such, the regulations are out of date and out of compliance with State ADU law. If an existing ADU ordinance fails to meet the requirements of State ADU Law, the ordinance is “null and void” and the jurisdiction must apply the standards set forth in State ADU Law until it adopts an ordinance that complies

with state law (Government Code, § 66316). Accordingly, it is City practice to defer to current State regulations for ADUs and JADUs, including HCD's most current ADU Handbook. City staff have contacted HCD (adu@hcd.ca.gov) on several occasions for technical assistance to ensure that State ADU regulations were being properly implemented in the City.

To ensure the City's permitting procedure for ADUs and JADUs is consistent with State law, 6th Cycle Housing Element Program HI-1 is continued and expanded.

Program HI-2(A)

This program commits the City to repealing Section 17.24.270 in its entirety, and amending any other Zoning Ordinance provisions that regulate ADUs (e.g., off-street parking standard in section 17.24.100.A) to comply with current State ADU law. Additionally, the Zoning Ordinance will be amended to include explicit language that ADUs and JADUs must be rented for period of no less than 30 days. The program also commits the City to promoting ADU and JADU by HI-9 to improve public awareness.

2.2.2 Single-Family Housing

The City defines single-family dwellings (referred to as "Dwelling, One-Family" in the definitions section of the Zoning Ordinance) as detached buildings designed and/or occupied exclusively by one family. As indicated in Table 6-9, 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 Ordinance, 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. Because the City's current definition is not consistent with State housing law, it is City practice to defer to State law when reviewing these types of units.

Program HI-2

To remedy this inconsistency with State law, Program HI-2 commits the City to the following: 1) amend the Zoning Ordinance 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).

A. Development Standards for Single-Family Housing

Zoning Ordinance section 17.24.260 specifies various objective standards for the exterior appearance of single family dwellings. Included in this list is a requirement that any single-

family home, including a manufactured home, have a minimum width of 20 feet (Section 17.24.260(A.1)). Section 17.24.260(B) provides a pathway for a property owner to deviate from the minimum width standard (and others).

While the 20-foot minimum dwelling width standard is objective, it has the potential to preclude the construction and placement of smaller footprint homes, including efficiency units. The minimum width standard also restricts home design to fit existing legal lots that may be small or irregularly shaped. Moreover, the standard may be inappropriately applied to accessory dwelling units constructed or placed pursuant to Government Code § 66314. Although section 17.24.260(B) provides a pathway for a property owner to deviate from the minimum width standard (and the other standards in the section), the approval criteria are ambiguous and do not provide approval certainty:

- The Planning Commission may allow a single-family home to deviate from the standards for exterior materials and the dwelling width where alternative reasonable development standards are substituted for those set forth in this section, or
- The Planning Commission may exempt such a home from the strict application of such development standards, upon a showing of good cause. A principal criterion for determining whether good cause exists for such exemption or substitution shall be compatibility with the neighborhood in which the structure is proposed to be constructed or placed.

Therefore, although the 20-foot minimum width standard is clear and objective, it is a potential barrier because it may preclude smaller homes, limit designs that accommodate existing nonstandard legal parcel shapes and sizes, and may be inappropriately applied to Government Code § 66314 ADUs.

Program HI-6(F)

To remove the 20-foot minimum width requirement as a potential constraint, Program HI-6(F) commits the City to amending the Zoning Ordinance to expressly preclude the application of the 20-foot minimum width standard to all ADUs.

2.2.3 Manufactured Housing and Mobile Homes

The City's definition of manufactured housing is the same as the definition in Section 18007 of the Health and Safety Code. Additionally, section 17.24.091 of the City's Zoning Ordinance contains standards for manufactured homes that restrict the placement of these types of units to the Planned Development Residential (PDR) zone. This requirement is inconsistent with State law because manufactured homes must be allowed in the same zones as stick-built residential structures (Government Code § 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 and permitting these types of units. To address this inconsistency with State law, Program HI-2(B) is included:

The City's definition of mobile homes is the same as defined in Section 18008 of the Health and Safety Code. There are two privately-owned mobile home parks in the City (owned by the same parties), with a total of 41 occupied mobile home spaces. 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 (PDR) 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. To address this inconsistency with State law, Program HI-2(B) has been included.

Program HI-2(B)

This program commits the City to amending the Zoning Code to allow manufactured housing and mobile homes in the same manner and in the same zones as conventional or stick-built structures are permitted. Program HI-2(B) is a continuation of 6th Cycle Program HI-1.

2.2.4 Multi-Family Housing

The City's Zoning Ordinance contains separate definitions for duplexes and triplexes, which are referred to as "Dwelling, Two-Family" and "Dwelling Three-Family," respectively. The Zoning Ordinance defines multi-family dwellings (referred to as "Dwelling, Multiple" in the definitions section of the Zoning Ordinance) 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 6-5 and Table 6-9, two-family dwellings are principally permitted in the R-2, R-3, MU, and O zones but are subject to the Site Plan Approval procedures. With a use permit, they are allowed in the R-1 and PDR. Three- and four-family dwellings are principally permitted in the R-3, MU, and O zones but are subject to the Site Plan Approval procedures. Three- and four-family dwellings 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).

As reviewed in 2.1.2(C) above, one potential barrier to the development of small-scale multi-family housing (i.e., four or fewer units) is the low availability of sites zoned R-2 and R-3. This constraint is addressed by Program HI-10 which commits the City to addressing the limited availability of rental and ownership housing that is affordable to the local workforce by initiating an voluntary upzoning program. Property owners will be incentivized to participate by the City offsetting the application costs to upzone eligible properties to either the R-2 or R-3 zones. Property owner participation in the program is strictly voluntary.

Additional constraints that inhibit the development and maintenance of multi-family development are the City's Site Plan Approval procedure and use permit findings discussed in sections 2.1.3(A) and 2.1.3(B) above. Program HI-4 commits the City to developing a regulatory procedure that would allow small-scale multi-family residential development to be principally permitted (by-right) without discretionary review when the proposed development complies with all applicable objective City development standards and is located outside of an environmentally sensitive areas. Program HI-10 will remove barriers to multi-family housing development and maintenance because it commits the City to undertaking regulatory and procedural improvements that increase approval certainty for residential development subject to a use permit. This program includes replacing existing subjective language in each residential and mixed use zoning district's purpose with objective language.

The PDR Zone allows multi-family housing with a use permit but some of the development standards 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, MU, and O 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, the 6th Cycle Housing Element included Program HI-19 that committed 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). Above in section 2.1.2(B), additional potential PDR Zone regulatory barriers to multi-family housing are described, and Program HI-3 expands Program HI-19 to address these barriers.

Another component of 6th Cycle Program HI-19 committed 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. These two zones allow multi-family housing and 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. Implementation of this program is in-progress as of the writing of this element update; to ensure this barrier is removed, this is being carried forward in the 7th Cycle Housing Element.

2.2.5 Condominiums and Townhomes

Condominiums describe a type of common ownership, while townhomes describe a type of use. Condominiums are permitted in the R-3 district and townhomes are permitted in the R-2 and R-3 districts. Condominiums are also allowed with the Planned Development (P-D) Combining Zone in any zone pursuant to approval of a planned development plan.

2.2.6 Mixed-Use

Mixed-use projects combine both nonresidential and residential uses on the same site. Mixed-use development can help reduce the effects of housing cost burden by increasing density and offering opportunities for reduced vehicular trips by walking, bicycling, or taking public transportation. Mixed Use residential developments are allowed in the MU, O, HC, RC, and SC zones, and in any zone with the Planned Development (P-D) Combining Zone pursuant to approval of a planned development plan.

2.2.7 Employee Housing, including Farmworker Housing

Government Code § 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, chaptered in the Health and Safety Code (HSC) §§17021.5, 17021.6, and 17021.8.

HSC § 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. Additionally, subdivision (b) expressly prohibits local ordinances including employee housing being included within the definition of a boarding house, rooming house, hotel, dormitory, or other similar term that implies that the employee housing is a business run for profit or differs in any other way from a family dwelling.

HSC § 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. Development applications for qualifying farmworker housing that meet specific State requirements on lands that are designated agricultural by a jurisdiction's general plan, HSC § 17021.8 requires cities and counties to process it through a faster, objective approval process, and cannot require discretionary permit. In addition to the general plan requirement, the requirements of HSC § 17021.8 include:

- The housing must be outside certain environmentally or safety-sensitive areas, such as wetlands, floodways, many high fire hazard areas, hazardous waste sites, and other protected locations.
- The housing must be operated by a certified affordable housing organization and restricted to affordable farmworker housing for at least 55 years.

HSC § 17021.8 does allow cities and counties to impose objective standards for:

- Water and wastewater service.
- Sewer connections.
- Road access.
- Parking.
- Health and safety standards for employee housing.
- Hazard mitigation requirements.

The City's Zoning Ordinance 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 Ordinance Section 17.16.020(A)(1)). Additionally, the City's Zoning Ordinance 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 planned for agricultural use and 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. However, it is subject to HSC §§ 17021.6 and 17021.8.

As discussed above, HSC §§ 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. For qualifying farmworker housing, HSC §17.021.8 requires the City to use a streamlined ministerial approval process with objective standards. To ensure the City's Zoning Ordinance is compliant with these sections of the Health and Safety Code, Program HI-2(H) has been included.

Program HI-2(H)

Program HI-2(H) includes specific commitments to amend the Zoning Ordinance for the following: 1) 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) 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; 3) a new agricultural employee housing development proposed on lands designated agricultural and that meets certain criteria is eligible for a streamlined, ministerial approval process and is not subject to a conditional use permit pursuant to HSC § 17021.8; and 4) amend the definition of "Farm Dwelling" in the Zoning Code to be consistent with HSC § 17026.1.

2.2.8 Emergency Shelters

In December 2022, the City adopted Ordinance 542 to meet the requirements of SB 2 (2007). Ordinance 542 is codified as part of City's Opportunity Zone (O Zone), the zoning district that permit emergency shelters as a by-right use. Currently, the Zoning Ordinance's definition chapter, § 17.08, does not include a definition of emergency shelter. Emergency shelters are described as part of the Opportunity Zone as follows:

Emergency Shelters. This use type allows housing with minimal supportive services for homeless persons that is limited to occupancy of six months or less by a homeless person. The shelters shall have onsite management and security shall be provided during hours when the shelter is open. Each shelter

shall be limited to a maximum of 15 beds. There shall be a separation of 300 feet between emergency shelters.

Beginning January 1, 2023, amendments to Government Code § 65583(a)(4) made by Assembly Bill 2339 (AB 2339) became effective. These amendments add additional local ordinance requirements and Housing Element analysis requirements on how cities and counties plan for emergency shelters. Table 6-10 reviews all of the statutory requirements and summarizes whether the City's existing emergency shelter regulations are compliant.¹⁰ As this analysis finds that some of the City's existing regulations do not comply with Government Code § 65583(a)(4), Program HI-2(G) carries forward the 6th Cycle Program HI-1 commitment for the preparation and adoption amendments to comply with the State law mandate for low barrier navigation centers, to include amendments to the City's emergency shelter regulations to resolve identified inconsistencies with State law.

Program HI-2(G)

The objective of the 6th Cycle Housing Element Program HI-1 is carried forward and expanded.

- The Program HI-1 commitment for the City to adopt compliant regulations for low barrier navigation centers (LBNCs), a specific type of emergency housing intervention for people experiencing homelessness, is carried forward.
- Program HI-2(G) also commits the City to amending its existing emergency shelter regulations to address the inconsistencies with State law and the constraints identified herein.

The City may elect to chapter its amended emergency shelter regulations, including those for LBNCs, either as part of Chapter 17.24, General Provisions and Exceptions, or into a new standalone chapter in Title 17.

¹⁰ Assembly Bill 2339 – Legislation Effective January 1, 2023: Housing Element: Emergency Shelters, December 29, 2022, prepared HCD, <https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/ab2339-notice.pdf>.

**Table 6-10 – Compliance Review of Compliance with Government Code § 65583(a)(4)
Regulations for Emergency Shelters**

Gov't Code § 65583(a)(4)(B) Topic	Does the City have an adopted standard? If yes, the standard.	Compliant?
Expands the definition of “emergency shelters” to include other interim interventions, including but not limited to, navigation centers, bridge housing, and respite or recuperative care.	Yes. Defined as part of Opportunity Zone (§ 17.16.111(B.8))	No. AB 2339 expands the definition of “emergency shelters” to include other interim interventions, including but not limited to, navigation centers, bridge housing, and respite or recuperative care.
Emergency shelters shall only be subject to the following written, objective standards:		It is noted that the O zone contains other performance standards that are not intended to apply to emergency shelters, and are intended to protect occupants from impacts associated other commercial and light industrial uses allowed in the O zone. However, this intent is not clearly communicated as the regulations are currently structured and written. Therefore, as part of Program HI-2(G), it is recommended that the Zoning Ordinance be amended to remove this ambiguity and potential constraint.
(i) The maximum number of beds or persons permitted to be served nightly by the facility.	Yes. 15 beds per shelter	No. The analysis in Chapter 7 demonstrates there is an approximately 19,000 square foot area on APN 025-201-023, which is adequate to accommodate the City emergency shelter need for 42 individuals. However, the existing 15-bed limit impedes emergency shelter planning to meet the need identified in the 2024 Point In Time Count. Therefore, the bed limit is a constraint.
(ii) Sufficient parking to accommodate all staff working	No explicit standard	No. The O zone’s Parking and Loading standards cross-reference BLZO sections 17.24.100 and

Gov't Code § 65583(a)(4)(B) Topic	Does the City have an adopted standard? If yes, the standard.	Compliant?
in the emergency shelter, provided that the standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone.		17.24.230. Section 17.24.100 is a schedule of off-street parking requirements based on the use and intensity of use. Currently, the schedule does not contain a parking standard specific for emergency shelters. The absence of a standard creates ambiguity and subjectivity as to the application of the appropriate standard. The absence of a specific standard creates the potential for personal interpretation and judgement that potentially could result off-street parking requirements in excess of all the staff working in the emergency shelter. As such, the existing regulations are inconsistent with subparagraph (ii) of GC § 65583(a)(4)(B).
(iii) The size and location of exterior and interior onsite waiting and client intake areas.	Yes, regulated by the O Zone's building height limit, setbacks, and lot coverage.	Yes. As analyzed in Chapter 7, the City has adequate area to develop emergency shelters to accommodate the 2024 Point In Time Count estimated unhoused population for Blue Lake.
(iv) The provision of onsite management.	Yes. "The shelters shall have onsite management and security shall be provided during hours when the shelter is open."	Yes.
(v) The proximity to other emergency shelters, provided that emergency shelters are not required to be more than 300 feet apart.	Yes, 300 feet separation between shelters	Yes. The analysis in Chapter 7 demonstrates that there is an approximately 19,000-square-foot area on APN 025-201-023 to meet the City's emergency shelter needs for the 2024 Point In Time Count estimated unhoused population for Blue Lake.
(vi) The length of stay.	Yes, 6 months or less	Yes.
(vii) Lighting.	Yes. Detailed in O zone performance standards	No. Some of the existing O Zone lighting performance standards are subjective.
(viii) Security during hours that the emergency shelter is in operation.	Yes, shelters shall have onsite security during hours when the shelter is open.	Yes.

Gov't Code § 65583(a)(4)(B) Topic	Does the City have an adopted standard? If yes, the standard.	Compliant?
The permit processing, development, and management standards applied shall not be deemed to be discretionary acts within the meaning of the California Environmental Quality Act	Yes. To the extent required by Government Code Section 65583(a)(4), emergency shelters shall be allowed as a permitted use without a conditional use or other discretionary permit.	Yes

2.2.9 Single Room Occupancy

Single room occupancy units (SROs) are one-room units intended for occupancy by a single individual. They are distinct from a studio or efficiency unit, in that a studio is a one-room unit that must contain a kitchen and a bathroom. Although SRO units are not required to have a kitchen or bathroom, many SROs have one or the other. SROs are often the most appropriate type of housing for extremely low-income persons.

2.2.10 Transitional and Supportive Housing

Transitional housing is a type of housing used to facilitate the movement of individuals and families experiencing homelessness to permanent housing. Residents of transitional housing are usually connected to supportive services designed to assist the homeless in achieving greater economic independence and a permanent, stable living situation. Transitional housing can take several forms, including group quarters with beds, single-family homes, and multi-family apartments, and typically offers case management and support services to help people return to independent living (often six months to two years).

Supportive housing is defined by Government Code § 65582 as housing with no limit of stay, that is occupied by a target population, and is linked with on- or off-site services that assist the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community. The target population is defined by Government Code § 65582 as persons with low incomes who have one or more disabilities including mental illness, HIV or AIDS, substance abuse, or other chronic health condition, or an individual eligible for services provided pursuant to the Lanterman Developmental Disabilities Services Act (Division 4.5 [commencing with Section 4500] of the Welfare and Institutions Code) and may include, among other populations, adults, emancipated minors, families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, and homeless people. Similar to transitional housing, supportive housing can take several forms, including group quarters with beds, single-family homes, and multi-family apartments.

State law (Government Code § 65583(c)(3)) requires both transitional and supportive housing to be explicitly permitted in the City's Zoning Ordinance, considered a residential use of property, and subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. There are currently no specific definitions for these housing types in the City's Zoning Ordinance, and they are not included under the definitions of single-family or multi-family housing. Because the BLZO does not comply with these provisions, it is the City's practice to directly apply the requirements of State law when reviewing and permitting these types of units.

Program HI-2(D)

This program commits the City to amending the Zoning Ordinance to amending the Zoning Ordinance to resolve the inconsistencies with State law identified above, and 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.

2.2.11 Supportive Housing Developments

In 2018, AB 2160 was signed into law and added Article 11 “Supportive Housing”, commencing at Section 65650, to Chapter 3, Division 1, Title 7 of the Government Code. AB 2160 applies to a narrowly defined group of housing developments and complements existing law for supportive housing discussed above. AB 2160 mandates that cities and counties allow qualifying supportive housing developments by-right, provide a ministerial approval process, and remove the requirement for CEQA analysis and for a CUP or other similar discretionary entitlements. More specifically, the new law obligates jurisdictions to permit qualifying supportive housing developments as by-right in zones where multi-family and mixed uses are permitted, including nonresidential zones permitting multi-family uses, when the proposed housing development meets all the requirements. For a housing development to be eligible as a by-right supportive housing development it must meet all the following:

- Units within the development are subject to a recorded affordability restriction for 55 years.
- 100 percent of the units, excluding managers’ units, within the development are restricted to lower income households and are or will be receiving public funding to ensure affordability of the housing to lower income Californians. For purposes of this paragraph, “lower income households” has the same meaning as defined in Section 50079.5 of the Health and Safety Code. The rents in the development shall be set at an amount consistent with the rent limits stipulated by the public program providing financing for the development.
- At least 25 percent of the units in the development or 12 units, whichever is greater, are restricted to residents in supportive housing who meet criteria of the target population. If the development consists of fewer than 12 units, then 100 percent of the units, excluding managers’ units, in the development shall be restricted to residents in supportive housing.
- The target population of the supportive housing units are persons and families who have experienced homelessness.
- The developer provides the planning agency with plan for providing supportive services, with documentation demonstrating that supportive services will be provided onsite to residents in the project, and contains all of the information required by Section 65652.
- Nonresidential floor area shall be used for onsite supportive services in the following amounts:
 - For a development with 20 or fewer total units, at least 90 square feet shall be provided for onsite supportive services.
 - For a development with more than 20 units, at least 3 percent of the total nonresidential floor area shall be provided for onsite supportive services that are

limited to tenant use, including, but not limited to, community rooms, case management offices, computer rooms, and community kitchens.

- The developer replaces any dwelling units on the site of the supportive housing development in the manner provided in paragraph (3) of subdivision (c) of Section 65915.
- Units within the development, excluding managers' units, include at least one bathroom and a kitchen or other cooking facilities, including, at minimum, a stovetop, a sink, and a refrigerator.

Jurisdictions may require supportive housing developments to comply with written, objective development standards but only to the extent that the objective standards apply to other multi-family developments within the same zone. The number of by-right supportive housing units in a qualifying development is limited to 50 units for cities with populations of less than 200,000 and a population of less than 1,500 persons experiencing homelessness, according to the most recent Point in Time Count.

Program HI-2(F)

This program commits the City to amending the Zoning Ordinance to comply with the requirements of Government Code § 65650 et seq.

2.3 Constraints to Housing for Persons with Disabilities

As part of a governmental constraints analysis, housing elements must analyze constraints upon the development, maintenance, and improvement of housing for persons with disabilities. Both the Federal Fair Housing Amendment Act (FHAA) and the California Fair Employment and Housing Act direct local governments to make reasonable accommodations (i.e., modifications) in their zoning laws and other land use regulations when such accommodations may be necessary to afford persons with a disability an equal opportunity to use and enjoy a dwelling. The Zoning Ordinance, permitting procedures, development standards, and building codes were reviewed to identify potential constraints for housing for persons with disabilities. It is the City's practice to comply with State law, where the Zoning Ordinance is unclear by applying State law directly when reviewing applications for housing for persons with disabilities. The City's current regulations regarding housing for persons with disabilities are described below.

2.3.1 Definition of a Family

A restrictive definition of "family" that limits the number of and differentiates between related and unrelated individuals living together may be discriminatory by illegally limiting the development and siting of group homes for persons with disabilities, but not for housing families that are similarly sized or situated. 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 current definition is:

“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 City’s limit on the number of unrelated persons residing in the home, Program HI-2(l) commits the City to updating the definition of family to a barrier-free definition that removes a potential constraint on group home facilities that do not require a State license.

2.3.2 Zoning Ordinance Definitions Relevant for Group Care Homes

Group homes are an important housing type for persons with disabilities. Like many other small rural jurisdictions, the City’s Zoning Ordinance contemplates group homes in the context of licensed residential care facilities that provide 24-hour non-medical care of unrelated persons who have a disability and are in need of personal services, supervision, or assistance essential for sustaining the activities of daily living or for the protection of the individual in a family-like environment, such as a nursing home. The BLZO does not currently expressly define group care homes or residential care facilities. However, the Definitions chapter (17.08) defines nursing homes and boarding house, both of which may be interpreted to be inclusive of residential care facilities and group homes:

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.

Boarding House: A dwelling, other than a hotel, wherein lodging and/or meals for four or more persons is provided for compensation.

The current definition of nursing homes is narrow and excludes certain categories of individuals on the basis of a disability, e.g., “not including persons suffering from...mental diseases, alcoholism, or drug addiction”. This definition is inconsistent with State and federal law. Program HI-2(l) addresses this actual barrier by committing the City to amending its Zoning Ordinance to address this barrier.

The definition of a boarding house may be interpreted to include a group home, and that is the City’s current practice. However, it may also be interpreted to be a type of transient lodging (e.g., bed and breakfast); this ambiguity may create uncertainty when reviewing and permitting a group home.

The 6th Cycle Housing Element indicated that the Zoning Ordinance’s definition of rooming houses may be interpreted to include group homes. While a rooming house is housing shared by unrelated persons, the rooming house living arrangement, by definition,

stipulates that the people residing in the home agree to a specific rent for a specific space. It is likely that this living arrangement would be considered to be a single housekeeping unit pursuant to HCD's December 2022 Group Home Advisory. Therefore, rooming houses are unlikely to constitute a group home.¹¹

The City finds the existing definitions to be ambiguous and inconsistent with HCD's December 2022 Group Home Technical Assistance memo. Program HI-2(I) commits the City to amending the Zoning Ordinance to include a definition of group homes that is consistent with State law.

2.3.3 Zones Permitting Group Care Homes

In accordance with State law, the City must allow group facilities for six persons or less in any area zoned for residential use, and may not require licensed residential care facilities for six or less individuals to obtain conditional use permits or variances that are not required of other family dwellings. The Zoning Ordinance does not explicitly state that group homes for six or fewer are allowed in all residential and mixed use zones. However, State law requires group care facilities for six and fewer individuals are allowed by right in all zones allowing residential development. To avoid ambiguity, Program HI-2(I) commits the City to amending the Zoning Ordinance to explicitly state that group homes of six or fewer, regardless of State licensing, are to be allowed by-right in all zones allowing residential uses, and subject only to the generally applicable, nondiscriminatory health, safety, and zoning laws that apply to residential uses of the same type allowed in the zone.

As stated throughout this chapter, it is the City's practice to comply with State law due to the inconsistency with the BLZO with current housing law. The City does not receive regular queries about siting group care homes for seven or more. While the Zoning Ordinance does not have modern group care home regulations, the regulations for boarding houses are consulted, or State law is applied directly. Group care homes for seven or more individuals are not a by-right use in any zones at this time due to the restrictive definition of family reviewed above. The Zoning Ordinance allows rest homes (which include nursing homes and convalescent homes) in the R-1, PDR, and RC zones with a conditional use permit. Boarding houses are allowed in the R-1, R-2, PDR, and HC zones with a conditional use permit. The Zoning Ordinance 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.

While the Zoning Ordinance does not have limitations on housing intended for persons with disabilities, it does not meet current legal requirements. This may lead to inappropriate application of outdated regulations and ambiguity and uncertainty for the City, the public,

¹¹ A rooming house is defined as "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". Group Home Technical Advisory, HCD, 2019, pg. 5

and decision-makers. Program HI-2(l) commits the City to amending the Zoning Ordinance to be consistent with State law.

2.3.4 Reasonable Accommodation Procedures

The City's Zoning Ordinance does not have a reasonable accommodation procedure. Program HI-2(l) commits the City to establishing administrative reasonable accommodation procedures for both individuals with disabilities and providers of housing for persons with disabilities. Nonetheless, the City's Zoning Ordinance facilitates access for persons with disabilities by allowing uncovered porches, fire escapes, landing places, and ramps to extend into setbacks. With the amendments proposed as part of Program HI-2(l), the City's Zoning Ordinance would not constrain the development, maintenance, improvement, or alteration of housing for persons with disabilities.

Program HI-2(l)

To remove potential constraints related to housing for persons with disabilities, this program commits the City to the following:

- 1) Amend the Zoning Ordinance definition of "family." The amendments shall not overly scrutinize living arrangements, require that residents be related by blood, marriage, or adoption, or impose a zoning limit on the number of unrelated people (e.g., "One or more persons living together in a dwelling unit") to ensure they are consistent with State housing law. In preparing the amendments, it is recommended that the City consult the Department of Housing and Community Development (HCD) Group Home Technical Advisory published December 2022.
- 2) Amend the Zoning Ordinance to provide a definition of group care homes that is consistent with State and federal law.
- 3) Amend the Zoning Ordinance to allow for group care homes with six or fewer persons, regardless of licensing, by-right in all residential zones and mixed use zones and subject only to the same restrictions applicable to other residential uses in that zone.
- 4) Amend the Zoning Ordinance to not inappropriately require that all group homes that provide services to more than 6 residents, regardless of licensing, that operate as single family residences, to obtain a use permit, site plan approval, or other special approvals to locate in any zones allowing single family units.¹²
- 5) Establish administrative reasonable accommodation procedures for both individuals with disabilities and providers of housing for persons with disabilities that are consistent with State and federal law.

¹² <https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/group-home-technical-advisory-2022.pdf>, accessed June 11, 2026.

Implementation of Program HI-2(I) will update the City's Zoning regulations and remove existing regulatory barriers to the development and operation of group homes in the City.

2.3.5 Building Codes

The City enforces the current California Building Standards Code provisions that govern the accessibility and adaptability of buildings to accommodate persons with disabilities. No unique restrictions are in place that would constrain the development of housing for persons with disabilities. Government Code Section 12955.1 requires that 10 percent of the total dwelling units in multi-family buildings without elevators consisting of three or more rental units or four or more condominium units subject to the following building standards for persons with disabilities:

- The primary entry to the dwelling unit shall be on an accessible route unless exempted by site impracticality tests.
- At least one powder room or bathroom shall be located on the primary entry level served by an accessible route.
- All rooms or spaces located on the primary entry level shall be served by an accessible route. Rooms and spaces located on the primary entry level and subject to this chapter may include, but are not limited to, kitchens, powder rooms, bathrooms, living rooms, bedrooms, or hallways.
- Common use areas shall be accessible.
- If common tenant parking is provided, accessible parking spaces is required.

2.3.6 Typical Densities for Development

As presented in Table 6-5 above, the maximum residential density in the City ranges from 1 unit per 2,000 square feet (21.78 units per acre or 22 units per acre when rounded up) to 1 unit per 6,000 square feet (7.26 units per acre or 8 units per acre when rounded up). While the O zone allows 1-bedroom units at a density of 1 unit per 1,250 square feet (38.84 units per acre), only eight 1- bedroom units per parcel are allowed by right.

During the 6th Cycle, the City did not receive property owner or developer requests to develop housing at densities below the identified realistic capacity of the adopted sites inventory. Consequently, the City does not find this to be a hinderance to the housing production to meet the City's RHNA.

2.3.7 Nonconforming Lots, Structures, and Uses

Zoning Ordinance section 17.24.210 recognizes and allows the development of legally created lots even if they may be nonconforming with respect to the area, frontage, width, or depth of the zone. The City's regulations for nonconforming lots does not present actual or potential constraints to development of housing.

Nonconforming uses and buildings are regulated by section 17.28.060 of the Zoning Ordinance, and are defined as "The lawful use of lands or buildings existing on the effective date of the application of these regulations to the subject property, although such use does

not conform to the regulation applied to such subject property, may be continued...”. Section 65852.25 of the Government Code restricts jurisdictions from enacting ordinances that prohibit the reconstruction, restoration, or rebuilding of a multi-family dwelling that is involuntarily damaged or destroyed by fire, other catastrophic event, or the public enemy. Subsection B of 17.28.060 is inconsistent with Government Code § 65852.25:

If any such use or building, after the effective date of the application of these regulations to the subject property is destroyed to the extent of 60% or more, then the subject property shall become subject to the regulations applicable to the subject property, and any subsequent use or buildings shall be in accordance with such regulations.

Subsection B. is inconsistent with State law because it would prohibit a property owner of a nonconforming multi-family from rebuilding if destroyed. For example, there is a fourplex located at the northeast corner of Greenwood Road and B Street. The property is approximately 7,840 square feet in size, and is in the R-1 zone. If the fourplex were destroyed in an earthquake or fire, it could not be reconstructed because fourplexes are not permitted in the R-1 zone. At best, a duplex could be built with an approved use permit. In addition, subsection C’s interruption standard does not support or encourage rehabilitation or reconstruction of a nonconforming multi-family building:

Any interruption of any nonconforming use, or the use of a nonconforming building which continues for six months or more, shall be deemed to be an abandonment of such use, and subsequent use or buildings shall be in accordance with the regulations applicable to the subject property.

Program HI-2(J)

This program commits the City to amending its nonconforming provisions to address the inconsistency with State law and to support the rehabilitation and reconstruction of nonconforming multi-family buildings.

Conclusion

A review of the City’s Zoning Ordinance found it does not encourage a diversity of housing, especially for multi-family housing and housing types that can typically be more affordable to the local workforce and for individuals and households on the lower end of the income spectrum. The Zoning Ordinance contains development standards that emphasize aesthetics and compatibility. However, it does not provide a road map to help property owners understand the community’s priorities for aesthetics and compatibility. This results in potential regulatory barriers for nearly all types of housing across all income spectrums. In sum, the Zoning Ordinances imposes barriers due to:

- Inconsistencies with State law and internal inconsistencies within the Zoning Ordinance itself.
- Subjective and vague design guidelines
- Code compliant projects can electively be subject to advisory design review.
- While there are zones that principally permit residential development, the Site Plan Approval procedures effectively subject principally permitted development to discretionary review.
- The land use controls that have the greatest effect on the supply of housing, especially multi-family development, and are the requirements for conditional use permits and Site Plan Approval. The requirements for discretionary approvals for most residential development increases preconstruction time and costs while reducing approval certainty.

To address the existing regulatory constraints to the development of a variety of housing types and tenures, several housing programs commit the City to amending its land use regulations to remove these constraints.

2.4 Codes and Enforcement

Pursuant to Blue Lake Municipal Code section 15.04.010, the City has adopted the California Building Standards Code, Title 24. Furthermore, all amendments and revisions to the California Building Standards Code, Title 24, California Code of Regulations, are automatically adopted by reference, and are effective 180 days after publication in the State Building Standards Code by the State Building Standards Commission in accordance with Municipal Code section 15.04.020. The City has not adopted any additional regulations or amendments that would hinder or add cost to residential development. In this way, dwellings can be constructed in compliance with the minimum state building code, without any additional City-imposed regulations or costs. The City encourages voluntary compliance with the code. On those occasions where it becomes known that construction is being done without a permit, the City makes an effort to bring the structure into compliance with the code to ensure the health and safety of present and future occupants. In addition, the City may investigate violations of the building code on a complaint basis. It is the City's current practice to allow for complaints to be filed anonymously.

2.5 Water and Sewer Priority

The City of Blue Lake is the sole provider of water and sewer service within the City. The City does not have policies or procedures, written or otherwise, that would prevent any level of income unit from connecting to sewer and water services. Government Code Section 65589.7(a) requires cities to deliver their adopted housing elements to the water and sewer providers which are to grant priority for service connections to proposed developments that include units affordable to lower-income households. Program HI-7(A) commits the City to internal distributing the adopted Housing Element and to establishing a written procedure

to grant priority for water and sewer allocations to proposed developments that include units affordable in accordance with subparagraph (b) of Government Code § 65589.7.

Program HI-7(A)

This program includes the following commitments:

- 1) the Planning Department will distribute the 7th Cycle Housing Element to the City Engineer and the Department of Public Works within 30 days of adoption, along with a summary of its Regional Housing Needs Allocation.
- 2) The City will establish a written policy with procedures to prioritize water and sewer connections for housing developments that include lower income units, to be completed within three years of adoption of the 7th Cycle Housing Element.

2.6 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.

3.0 Analysis of Nongovernmental Constraints

This section identifies and analyzes constraints that are not under the direct control of the government. Potential nongovernmental constraints that affect the cost of developing land for housing include land costs, construction costs, and the availability and cost of financing. Additionally, the business decisions of individuals and organizations in home building, finance, real estate, and rental housing also affect housing cost and availability. These interrelated factors may constrain the ability of the private and public sectors to provide adequate housing that meets the needs of all economic segments of the community.¹³

3.1 Land Costs

The cost of raw, developable land creates a direct impact on the cost for a new home and is considered a possible constraint. A higher cost of land raises the price of a new home. Land prices are determined by numerous factors, most important of which are land availability and permitted development densities. As land becomes less available, the price of land increases. Developers often seek City approval for the maximum allowed densities per parcel of land.

According to online listings from Zillow.com in July 2026, four vacant parcels are currently listed for sale in Blue Lake. A further three parcels have been sold since 2024. Asking prices for lots sold or listed since 2024 ranged from \$2.25 to \$10.62 per square foot or \$125,000 to \$589,000 per lot. This provides an average of \$6.30 per square foot or \$274,520 per acre. The prices of land vary depending on a number of factors, including size, location, the number of units allowed on the property, and access to utilities.

Table 6-11 – Vacant Land Costs

For Sale or Sold	Lot Size in Sq. Ft.	Price	Price per Sq. Ft.
For Sale	17,424	\$175,000	\$10.04
For Sale	65,340	\$350,000	\$5.36
For Sale	17,424	\$185,000	\$10.62
For Sale	32,670	\$225,000	\$6.89
For Sale	206,039	\$589,000	\$2.86
Sold	60,113	\$135,000	\$2.25
Sold	20,473	\$125,000	\$6.11
Sold	17,424	\$175,000	\$10.04

Source: Zillow.com, accessed July 2026

¹³ The environmental conditions may also constrain and limit property development and affect the cost of development. Blue Lake's environmental conditions are programmatically reviewed in Chapter 7.

3.2 Construction and Labor Costs

Factors that affect the cost of building a house include the type of construction, materials, site conditions, finishing details, amenities, and structural configuration. They are also influenced by market demands and market-based changes in the cost of materials.

Buildora IQHome is an internet-based home construction estimating platform.¹⁴ Buildora IQHome estimates the cost to construct a 1,800 square foot entry-level single-family home in Humboldt County to range from \$243 to \$311 per square foot, or \$435,000 to \$560,000, excluding land costs (as of July 2026). A mid-range 2,400 square foot single-family home is estimated to be approximately \$220 to \$380 per square foot, or \$530,000 and \$910,000, excluding land costs as of July 2026.

Information from a nonprofit developer that has developed affordable multi-family housing projects in the region estimates that the cost to construct and operate a subsidized affordable multi-family housing project, including soft costs, is about \$482 per square foot as of July 2026 (excluding land costs).

A reduction in amenities and the quality of building materials can result in lower construction costs and lower purchase prices. Per-unit costs also decline with the size of the project, as developers benefit from economies of scale and are able to produce housing at a lower per-unit cost. High labor or material costs could substantially increase the cost of construction in the City 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 rehabilitation of existing housing.

3.3 Availability of Financing

The cost of borrowing to finance housing construction or house purchases affects the amount of housing available across all income levels in Blue Lake. Higher interest rates increase a homebuyer's monthly payment and decrease the range of housing that a household can afford. Lower interest rates result in lower costs and lower monthly payments for the homebuyer. When interest rates rise, the market typically compensates by decreasing housing prices. Similarly, when interest rates decrease, housing prices begin to rise. There is often a lag in the market, causing housing prices to remain high when interest rates rise until the market catches up. Lower-income households often find it most difficult to purchase a home during this time period. As shown in Figure 2 mortgage rates reached a ten-year low of 2.65% in January 2021. Since then, average rates for 30-fixed rate mortgages have been increasing, while fluctuating, have been greater than 5.0% beginning in 2022 and mostly above 6.0%, peaking during the reporting period in November 2023 at 7.76%.

¹⁴ <https://buildoraiq.com/cost-to-build-home/humboldt-county-ca>, accessed July 10, 2026.

Figure 2 - 30-Year Fixed Rate Mortgage Average in the U.S, 2017 to 2026.¹⁵

Adjustment rate mortgages (ARMs) and graduated payment mortgages (GPMs) are mortgage alternatives to the conventional 30-year fixed-rate mortgage. These types of loans allow homeowners to take advantage of lower initial interest rates and payments to qualify for larger home loans. However, ARMs are not ideal for low- and moderate-income households living on tight budgets, given the risk that monthly housing costs could exceed their financial means. The availability of variable-rate mortgages has declined since the Great Recession due to increased regulation of housing lending markets. A GPM is a type of fixed-rate mortgage with the monthly payments increasing gradually from an initially low base level to a higher final level.¹⁶ GPMs may be a negative amortization loan because the borrower's payments are less than the interest charged on the note. This payment structure creates deferred interest, which adds to the total principal of the loan.¹³ The Federal Home Administration (FHA) offers GPM loans for homebuyers who currently have low to moderate incomes but expect them to increase substantially over the next 5 to 10 years.¹⁷ A key risk associated with GPM loans is the borrower's income growth may not match the GPM's payment structure, risking borrower default. While there are other alternative lending instruments that may give moderate- and lower-income households opportunity to purchase, the fixed-interest-rate mortgage remains the preferred type of loan, especially during periods of low, stable interest rates.

Table 6-12 presents interest rates as of July 2026 sourced from Wells Fargo. The table presents both the interest rate and annual percentage rate (APR) for different types of home

¹⁵ Freddie Mac, 30-Year Fixed Rate Mortgage Average in the United States [MORTGAGE30US], retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/MORTGAGE30US>, accessed July 9, 2026.

¹⁶ <https://www.investopedia.com/terms/g/graduatedpaymentmortgage.asp>, accessed July 9, 2026.

¹⁷ https://www.fha.com/graduated_payment, accessed July 9, 2026.

loans. The interest rate is the percentage of an amount of money which is paid for its use for a specified time, and the APR is the yearly percentage rate that expresses the total finance charge on a loan over its entire term. The APR includes the interest rate, fees, points, and mortgage insurance and is therefore a more complete measure of a loan's cost than the interest rate alone. However, the loan's interest rate, not its APR, is used to calculate the monthly principal and interest payment.

Table 6-12 – Interest Rates

Conforming Loan Type	Interest Rate	APR
30-year fixed	6.625%	6.854%
15-year fixed	5.875%	6.222%
7/6-month adjustable rate*	6.250%	6.522%

Source: [Wells Fargo](#), July 2026.

* Fixed rate and payments for the first 7 years, then the rate adjusts periodically.

To reduce financial impediments to the construction of new housing, for the 6th cycle planning period, the City of Blue Lake.

3.4 Other Nongovernmental Constraints Upon the Maintenance, Improvement, or Development of Housing for All Income Levels

The preceding sections reviewed the costs of land, labor and materials, and financing as a constraint. The following paragraphs review other types of potential and actual nongovernment constraints that may hinder the maintenance, improvement, or development of housing for all income levels in accordance with subparagraph (a)(6) of Government Code Section 65583.

Access to housing opportunities can be dependent on interpersonal relationships. In communities such as Blue Lake where there is limited housing supply and low housing turnover, housing opportunities are often shared through informal social networks before they reach the broader market. In the 2026 Housing Element Community Survey for Blue Lake, responses suggest that the limited housing supply in Blue Lake has created a perception that obtaining housing often depends on having an "in", whether through family members, friends, employers, or other personal connections. Survey respondents described difficulty finding available homes and rental units and expressed frustration that opportunities are scarce, particularly for first-time homebuyers, young families, local workers, and individuals without established ties to the community. Several comments indicated that residents would like to remain in or move to Blue Lake but have been unable to secure housing due to the lack of available options. Collectively, these responses suggest that when housing opportunities are infrequent, they are often communicated through informal networks before becoming broadly available, making it more difficult for newcomers or those without local connections to access housing. While there is no

evidence that housing providers intentionally limit access based on personal relationships, the survey indicates that the constrained housing market has fostered a perception that social connections are often necessary to identify or secure available housing. This dynamic may disproportionately affect young adults seeking to establish independent households, employees relocating to the area, and individuals and households without existing community networks.

The City believes the analysis above in combination with the programs outlined above (see Chapter 4 for further detail) will reduce potential and actual nongovernment constraints that may hinder the maintenance, improvement, or development of housing for all income levels

Chapter 7 – Sites Inventory

Overview

State law requires the jurisdiction’s housing element have an inventory of land suitable for residential development. The inventory is to include vacant sites and sites with potential for redevelopment, an analysis of the relationship of zoning and infrastructure and services to these sites, and an analysis of the relationship of the sites identified in the land inventory to the jurisdiction’s duty to affirmatively further fair housing. The purpose of the inventory is to identify sites that can be developed for housing for all income levels within the planning period (Government Code § 65583.2), including emergency shelters which have specific criteria. This section is divided into the following three subsections:

Section 1.0 – Review of Progress Meeting the 6th Cycle Regional Housing Needs Allocation (RHNA)

Section 2.0 – Analysis of Blue Lake’s Environmental and Infrastructure Constraints

Section 3.0 – Blue Lake’s 7th Cycle Regional Housing Needs Allocation

Section 4.0 – Analysis of site(s) identified for the City to meet its regional share of allocated housing need.

Section 5.0 – Analysis of sites identified to accommodate emergency shelters pursuant to AB 2339 (2022).

Section 6.0 – Analysis of other sites available to provide a variety of housing types.

1.0 Review of Progress Meeting the 6th Cycle Regional Housing Needs Allocation (RHNA)

Looking back at the status of the City’s residential land inventory and its performance meeting the RHNA during the previous Housing Element is the starting place for identifying sites to meet housing needs of the 7th Cycle Housing Element. Table 7-1 below presents Blue Lake’s progress in meeting its RHNA housing needs according to the City’s most recent Housing Element Annual Progress Report (APR) prepared in 2025. The number of housing units issued building permits for each calendar year of the 6th Cycle planning period is shown in Table 7-1. The issuance of a building permit for the construction of a residence is the State law metric used to count housing units toward the City’s progress in meeting the jurisdiction’s share of the RHNA. The table shows a total of 10 housing units were developed over the six-year period from 2019 to 2025, with one of the units estimated as being affordable to moderate income households and the rest affordable to above moderate-income households. No housing units affordable to lower income households have so far

been constructed during the planning period of the 6th Cycle Housing Element (2019 – 2027).

Interestingly, none of the new homes recently permitted by the City were on sites identified for new development in the land inventory. Five of the new homes permitted were identified as “Accessory Dwelling Units” (ADUs) in the APR approved on lots with existing single-family residences. These new homes are typically less expensive to build because they are built on parcels with existing utilities and road access which reduces development costs. Nonetheless, all of ADUs permitted in Blue Lake from 2019 to 2025 are estimated to be affordable to above-moderate income households according to the City’s filed annual progress reports.

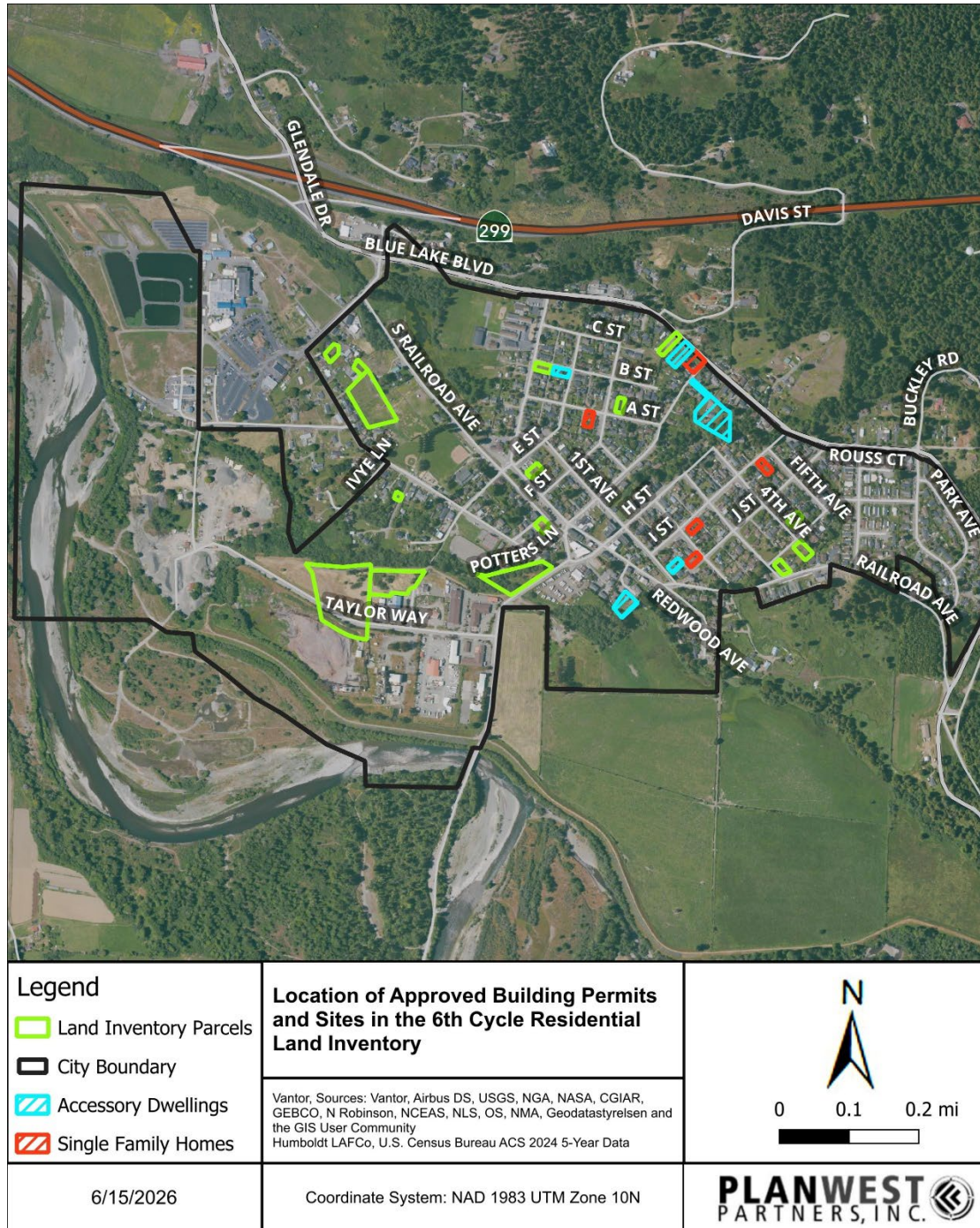
It appears that four of the new residences permitted are replacements of existing single-family homes. Figure 7-1 below shows the 6th Cycle land inventory parcels (green), properties with new ADU permits (red), and other new permitted residences (blue).

Table 7-1 – Blue Lake RHNA Progress 2019-2025

Income Level		RHNA Allocation by Income Level	Building Permits Issued in 2019	Building Permits Issued in 2020	Building Permits Issued in 2021	Building Permits Issued in 2022	Building Permits Issued in 2023	Building Permits Issued in 2024	Building Permits Issued in 2025	Total Units to Date (all years)	Total Remaining RHNA by Income Level
Very Low	Deed Restricted	7								0	7
	Non-Deed Restricted										
Low	Deed Restricted	4								0	4
	Non-Deed Restricted										
Moderate	Deed Restricted	5								1	4
	Non-Deed Restricted		1								
Above Moderate		7	1	0	0	2	4	2	0	9	0
Total RHNA		23									
Total Units			2	0	0	2	4	2	0	10	15

Source: HCD Annual Progress Reports, Tables A and A2, <https://www.hcd.ca.gov/apr>, accessed April 14 and June 3, 2026.

Figure 7-1 – Location of Approved Building Permits and Sites in the 6th Cycle Residential Land Inventory



2.0 Analysis of Blue Lake's Environmental and Infrastructure Constraints

Pursuant to Government Code § 65583.2(b)(3), the City's sites analysis for the land inventory considers the following environmental constraints that may limit development potential as described below. Only those environmental constraints where documentation of such conditions is available to the City are described. State Housing Element law does not require the City to perform a project level environmental analysis on a site-by-site basis. Moreover, and notably, the City does not have consent from individual property owners to conduct a project level review.

Because of these limitations, identifying a property in the housing element sites inventory does not constitute environmental clearance or approval of an entitlement to develop the property for housing, nor does it infer or assure clearance or approval. Neither the property owner nor the City is relieved from completing site specific environmental studies, using qualified professionals, as appropriate. The following paragraphs describe the environmental constraints evaluated and the general results in the City's 7th Cycle residential land inventory:

2.1 Environmental Constraints

Brownfields: The California Water Board's GeoTracker data was used to remove sites that require cleanup, such as Leaking Underground Storage Tank (LUST) Sites, Department of Defense Sites, and Cleanup Program Sites. Sites with or adjacent to a GeoTracker status other than Completed – Case Closed are excluded.¹ The California Department of Toxic Substances Envirostor database was also consulted for tracking hazardous waste facilities and sites with known contamination or sites where there may be reasons to investigate further. No sites within the City have brownfields that would exclude them accommodating the City's housing needs.

Fire Hazards: CalFire's 2025 Recommended Fire Hazard Severity Zones for Local Responsibility Areas (LRA) mapping was consulted and used to evaluate sites.² No sites within the City have very high fire severity rating that would exclude them from accommodating the City's housing needs.

Flooding Hazards: The Federal Emergency Management Agency (FEMA) has mapped floodplains in the Blue Lake planning area. The City has an adopted Floodplain Management Ordinance (Chapter 13.20) that regulates new development and expansions of existing development in the floodplain. There are flood hazard areas within the City and although some sites are within the 500-year flood hazard zone, only one is located within the 100-year floodplain - Assessor's Parcel Number (APN) 025-141-007. The development potential

¹ <https://geotracker.waterboards.ca.gov>, accessed May 18, 2026.

² CalFire published recommended Fire Hazard Severity Zone maps for Local Responsibility Areas in 2025. At the time this document was written they not yet been adopted by the local fire agency (Blue Lake Fire Protection District). On May 27, 2025, the City adopted the CalFire Fire Hazard Severity Zone map for Blue Lake by Ordinance 545-2025.

assigned to that parcel was reduced to reflect only the portion of the site outside of the mapped flood hazard areas.

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 dam failure, which includes inundation mapping identifying 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. While 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, there are also established residential neighborhoods that are southwesterly of 1st Avenue and westerly of Greenwood Road that are in the mapped inundation area. 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 describes the response operations to be implemented in the event of a dam failure.

Streams and Water Bodies: The U.S. Geological Survey's (USGS) National Hydrography Dataset identifies areas where streams or water bodies such as lakes are present. The presence of streams and lakes can significantly increase preconstruction time and cost to determine how to avoid them directly and indirectly. There are streams and other water bodies within the City such as Powers Creek and its tributaries. Sites where the only building footprint is within a stream or biological resource protection setback are excluded from the analysis.

Wetlands: The U.S. Fish and Wildlife Service's current National Wetlands Inventory (NWI) reveals numerous areas in the City where wetlands may be present. The California Aquatic Resources Inventory (CARI) Wetlands was also consulted. CARI is a compilation of local, regional, and statewide aquatic resource GIS datasets into a seamless, statewide coverage of aquatic resources that employs a common wetland classification system. Application of this data yielded essentially the same result as application of the NWI data. The presence of wetlands can significantly increase preconstruction time and cost due to additional regulatory requirements. Because of the increased preconstruction costs associated with the presence of wetlands, these sites are more likely to be affordable only to above moderate-income households. Sites where wetlands are present are excluded from the residential land inventory for moderate and lower-income households and emergency shelters.

2.2 Infrastructure 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 (i.e., Taylor Way); 2) a sewer mainline extension would be required to serve the parcels towards the end of Taylor Way in the Powers Creek District; and 3) there is inadequate stormwater infrastructure in many areas of the City that results in localized flooding during winter storm events.

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

City wastewater infrastructure 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 repairs needed.

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 and at the Blue Lake Rancheria. 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 7-3 and Table 7-6. 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 6th Cycle Program HI-18 is being carried forward in the 7th Cycle Housing Element as part of Program HI-7. Program HI-18 commits the City to construction of the wastewater treatment plant improvements within two years of the July 2025 adoption of the 6th Cycle Housing Element. The adopted 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. Program HI-18's objective to increase wastewater capacity is being carried forward as part of 7th Cycle's Program HI-7 to provide a completion time frame buffer as securing funding support is an important step as it will help offset the costs to completing these improvements.

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 used funding from the Regional Early Action Planning (REAP) program to map existing stormwater infrastructure. Identifying the existing location and condition of existing stormwater infrastructure allows the City to identify the areas in need of repair and improvement, improving the City's ability to apply for grant funding for stormwater infrastructure upgrades. In the future, the City proposes to amend the Municipal Code to add stormwater objective performance standards that are anticipated to 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 Humboldt County's Low Impact Development Stormwater Manual; and 2) the payment of stormwater drainage fees to be used for the improvement, operation, and maintenance of stormwater drainage facilities. The proposed stormwater performance standards would require new development to install and maintain onsite stormwater management facilities to ensure that the volume and rate of post-construction stormwater runoff does not exceed pre-construction conditions to avoid adverse impacts to the City's existing stormwater infrastructure.

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. Providers of these services 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: Optimum and AT&T
- Landline Telephone: Optimum and AT&T
- Cellular phone: Verizon, T-Mobile, AT&T

2.3 Other Constraints Considered For Sites Meeting the RHNA

Lot Suitability: To be counted in the residential land inventory, a single-family residence with a floor area of at least 800 square feet must be able to be developed outside of the required setbacks. Sites with existing development are not counted.

Affordable Land Inventory: Subparagraph (c) of Government Code Section 65583.2, specifies the statutory requirements for sites to be eligible to accommodate the City's lower income RHNA housing needs:

- Sites must be at least 0.50 acre in size, but smaller than 10 acres.
- Public water and sewer, and dry utility infrastructure must be available nearby.
- Sites can be accessed from a public street.
- The site's zoning must also allow multifamily uses at a density of at least 15 dwelling units per acre.
- While a city may identify nonvacant sites to accommodate a jurisdiction's lower-income RHNA, the city then must demonstrate that the existing use and improvements are not an impediment to residential development; however, State Housing Element law presumes existing uses impede additional residential development on nonvacant sites (Government Code § 65583.2(g)(2)).
- If a site used in one or more previous housing element cycles (the number of cycles depends on whether the site is vacant or nonvacant) and has not been approved for residential development, to be eligible to accommodate the jurisdiction's lower income RHNA it must be zoned to allow residential use by right for housing developments in which at least 20 percent of the units are affordable to lower income households at a density of at least 15 dwelling units per acre.?

3.0 Blue Lake's 7th Cycle Regional Housing Needs Allocation

The City of Blue Lake's Regional Housing Needs Allocation (RHNA) for the 7th Cycle is 41 housing units spread throughout a range of income categories as shown below in Table 7-2.

Table 7-2 – Humboldt County 7th Cycle RHNA

Number of Housing Units Allocated by Jurisdiction									
Income Category	Arcata	Blue Lake	Eureka	Ferndale	Fortuna	Rio Dell	Trinidad	Unincorp. County	Total
Acutely Low (0-15% AMI*)	103	3	179	6	50	7	3	211	562

Number of Housing Units Allocated by Jurisdiction									
Income Category	Arcata	Blue Lake	Eureka	Ferndale	Fortuna	Rio Dell	Trinidad	Unincorp. County	Total
Extremely Low (15-30% AMI)	160	7	267	9	75	11	4	333	866
Very Low (30-50% AMI)	117	4	193	7	53	6	3	244	627
Low (50-80% AMI)	206	8	328	11	93	16	5	397	1,064
Moderate (80-120% AMI)	89	4	154	5	44	10	6	253	565
Above Moderate (>120% AMI)	367	15	619	19	164	45	6	1,043	2,278
Total	1,042	41	1,740	57	479	95	27	2,481	5,962

* Area median Household Income (AMI)

Source: Humboldt County Association of Governments, 7th Cycle Final RHNA Plan, June 2026.

This represents an increase of 18 units (78%) compared to Blue Lake's previous RHNA allocation. Blue Lake is not alone in experiencing an increase in its allocated housing needs; the entire county was allocated a 75% higher housing need for the 7th Cycle compared to the 6th Cycle. The basis for the region's significantly higher RHNA allocation is due to the following:³

- **Cost burden:** The percentage of Humboldt County households, both owners and renters, who are paying 30 percent or more of their gross income for housing exceeds the national average: 42.15% and 31.68%, respectively. HCD estimates that Humboldt County would need to add 3,639 housing units to the existing 54,878 occupied units to reduce the cost burden rate to about 32%.
- **Vacancy:** The rate of owner and renter vacancies is below the healthy standards of 2% and 6%, respectively.
- **Overcrowding:** The rate of overcrowding in Humboldt County (4.06%) exceeds the average national rate of 3.40%.
- **Homelessness Adjustment:** HCD applied an adjustment based on the housing needs of individuals and families experiencing homelessness. An adjustment of 769 units was applied to Humboldt County using data from the Humboldt Housing & Homelessness Coalition 2024 Point-in-Time Count and DOF household formation rates.

3.1 No Net Loss Compliance⁴

³ <https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/housing-element/humboldt-county-final-determination-letter.pdf>, accessed May 8, 2026.

⁴ See Association of Bay Area Government's, https://abag.ca.gov/sites/default/files/documents/2021-10/RHNA_Buffer_Document_Final.pdf?cb=6723e702, accessed June 10, 2026.

Housing Element law requires that a jurisdiction's Housing Element identify adequate sites to accommodate its RHNA at all incomes. (Housing Element law, however, does require the jurisdiction to build the housing, as that decision remains with the private property owner.) The No Net Loss law (Government Code Section 65863) supplements the Housing Element requirement for adequate sites for all income levels by requiring jurisdictions to maintain sites that can accommodate both the projected overall number of units and the number of units at each income level. Unless jurisdictions have more sites in their Housing Element inventory than the minimum required, they may fall out of compliance if they:

1. Reduce a site's residential density.
2. Approve development applications with fewer units on the site than identified in the Housing Element.
3. Approve development applications with higher income units than stated in the Housing Element.

If development is approved that results in a jurisdiction's inventory being in a deficit (either by number of units or by income category), the jurisdiction must, within 180 days, identify other sites meeting the Housing Element's site selection criteria requirements so that the site inventory is no longer in a deficit. To ensure the City is continuously compliant with No Net Loss law, Program HI-8 is incorporated. This Program commits to continuously implementing an evaluation procedure to track the City to the City elected to

4.0 Sites Identified for the 7th Cycle Residential Inventory to Meet Blue Lake's Regional Housing Needs Allocation

To meet the City's 7th Cycle RHNA allocation and buffer totaling 49 units, the City has identified 18 sites as shown in Figure 7-2 and described in Table 7-4 below. These are mostly the same sites identified in the land inventory for the previous Housing Element, since none of those sites were developed during the 6th Cycle planning period. However, there are notable differences.

Figure 7-2 – Proposed 7th Cycle Residential Land Inventory

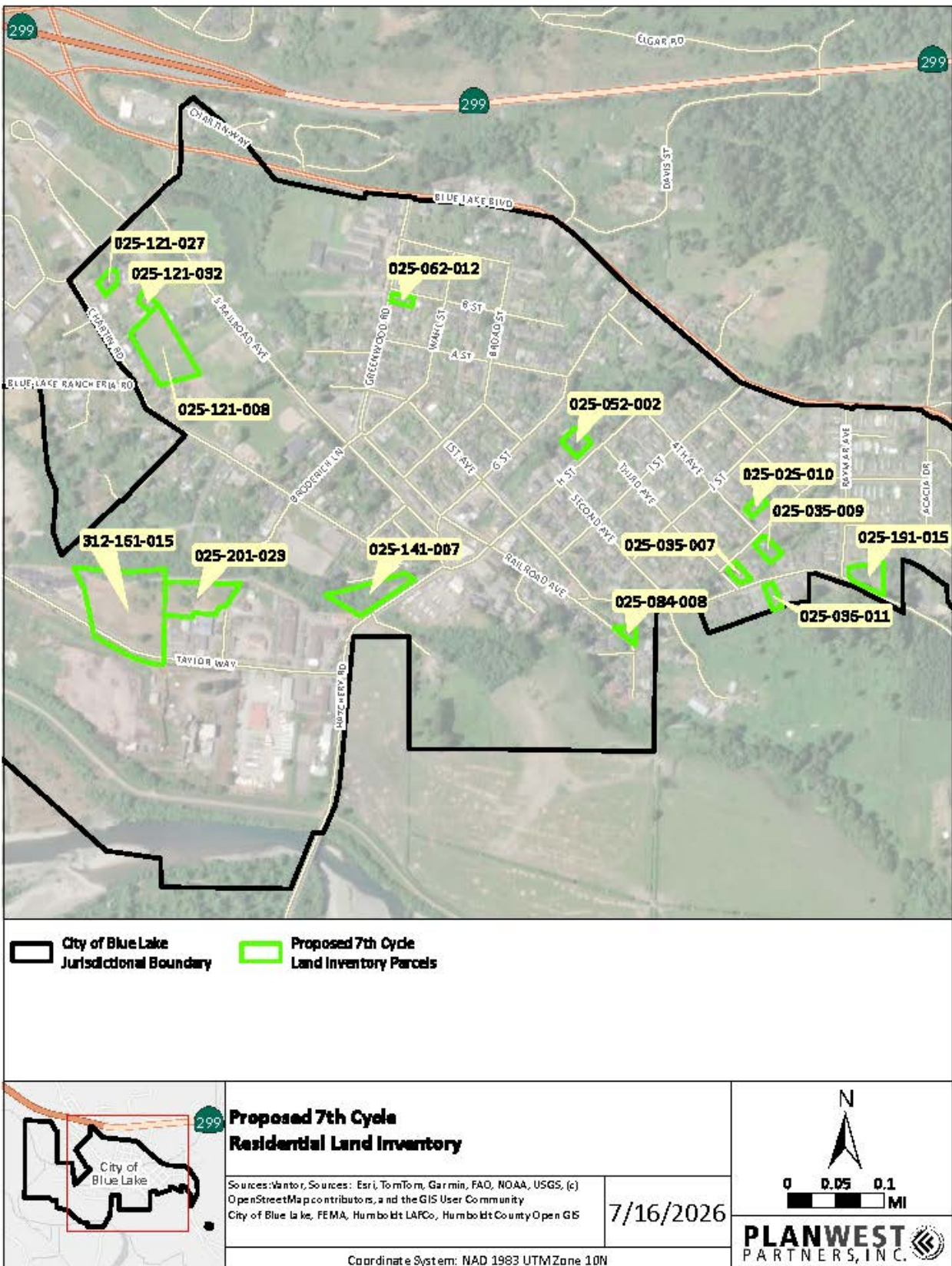


Table 7-3 – Detail of Proposed 7th Cycle Residential Land Inventory

APN	Total Acreage	Residentially Zoned Ac.	GP Des.	Zoning	# of units	Assumed Income Category
025-025-010	0.15	0.15	MD	R-1	1	Above Moderate
025-035-007	0.17	0.17	MD	PDR	1	Above Moderate
025-035-009	0.24	0.24	MD	PDR	1	Above Moderate
025-036-011	0.17	0.17	MF	R-3	2	Above Moderate
025-052-002	0.31	0.31	MD	R-1	1	Above Moderate
025-062-012	0.17	0.17	MD	R-1	1	Above Moderate
025-084-008	0.13	0.13	MD	R-1	1	Above Moderate
025-121-008	1.88	1.88	MD	PDR	1	Above Moderate
025-121-027	0.21	0.21	MD	PDR	1	Above Moderate
025-121-032	0.15	0.15	MD	PDR	1	Above Moderate
025-141-007	1.34	1.34	I	MU	4	Moderate
025-191-015	0.52	0.52	MD	PDR	1	Above Moderate
025-201-023	1.44	1.00	I	O-MF	16	Very Low, Extremely Low, Acutely Low ¹
312-161-015	4.56	3.40	I	O, X	40	Low, Very Low ²
14 sites	11.4	9.8			72	

Notes: ^{1,2} See Table 7-5 below.

Source: Planwest Partners, 2026

Differences between the 6th and 7th Cycle Land Inventories are listed below:

- A vacant parcel that is zoned R-3 and is 0.17 acres in size has been added as an Above Moderate income site. Although the R-3 zone allows up to a fourplex without a use permit, because this site is less 0.50 acres in size, it is too small to meet the 0.50 acre minimum site size threshold to be identified as a lower-income inventory site. Nonetheless, it is large enough to accommodate the development of a duplex which would comply the R-3 zone's maximum density of 1 dwelling unit per 2,000 square feet (ADU development is not included in this estimate).
- The development potential on APN 025-201-023 has been increased from 10 to 16 dwelling units to reflect the minimum residential density of the recently adopted Multifamily (-MF) Combining Zone on the property in 2025 (Ordinance 546 adopted 12/23/25). All 16 of these units are assumed to be affordable to very low, extremely low, and acutely low-income households reflecting the MF Zone's allowance for supportive housing.

With these changes, the development potential of the sites in the 7th Cycle residential land inventory is 77 units, 28 units above the RHNA need with a 15% buffer added (49 units). The following paragraphs details the evidence supporting the findings that the City meets the RHNA and buffer allocations for each of the income categories.

Extremely Low and Acutely Low-Income Categories - The 7th Cycle RHNA assigns the City 10 units of housing affordable to the Extremely-Low and Acutely Low-Income groups. These needs are met through the development potential of 16 units on the one-acre portion of APN 025-201-023 which has an MF Combining Zone. Table 7-5 details the qualifying characteristics of the parcel meeting the extremely low and acutely low-income housing needs, and Figure 7-3 is a map showing the parcel.

Low and Very Low-Income Categories - The 7th Cycle RHNA and buffer assigns the City eight units in the low-income category and five units in the very-low-income categories which are met through the development potential of 40 units on APN 312-161-015. Table 7-5 details the qualifying characteristics of the parcel meeting the extremely low and very-low-income housing needs, and Figure 7-3 is a map showing the parcel.

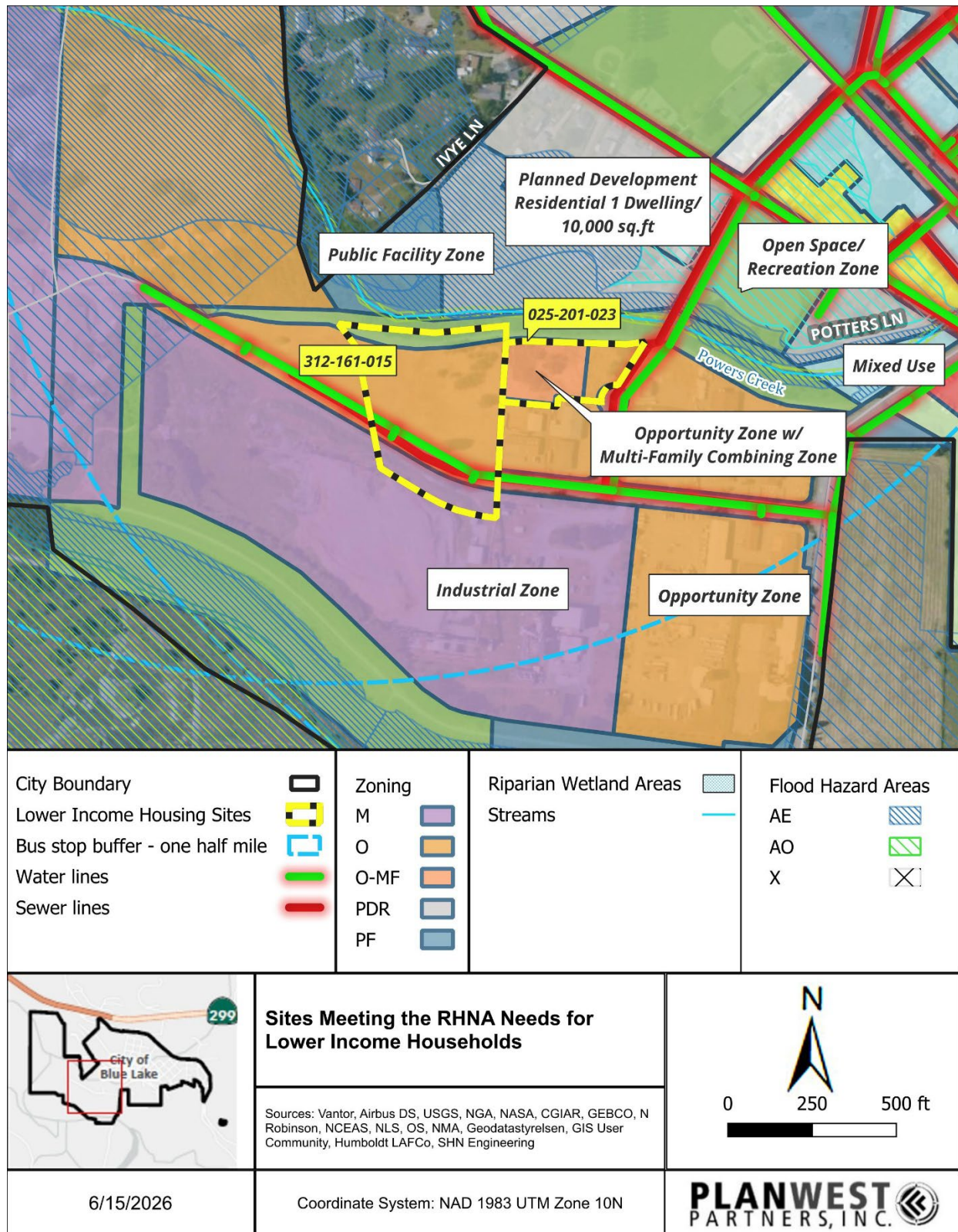
All essential infrastructure, i.e., community water, sewer, power, internet, and phone are available at these sites. The sites are also located within ½ mile from a transit stop at City Hall which provides daily access to numerous shopping and medical services in Arcata, and connects to other buses to the City of Eureka which is a regional commercial center and has government offices, shopping, social services, and health care facilities. Also, restaurants and a small convenience store are in Blue Lake within ½ mile of both sites. The sites are surrounded by light industrial, residential and open space uses.

Table 7-4 – Details of Sites Meeting RHNA Needs for Lower Income Households

APN	025-201-023	312-161-015
General Plan	Mixed Use	Mixed Use
Zoning	O-MF, O	O, X
Max. # Units/Acre	20†	13†
Vacant or Nonvacant	Vacant	Vacant
Used in Previous Cycle	Yes, 5th and 6th Cycles	Yes, 6th Cycle
Realistic Development %	69%	75%
Realistic # of Units	16	40
Total Acres	1.44	4.56
Developable Acres	1.0*	3.4
Wetland	No	Yes – on portion zoned X
Very High Fire Severity	No	No
Income Category Discussion	A one-acre portion of the site was rezoned in 2025 to accommodate the City's 5th Cycle shortfall. The rezone added an MF Combining Zone (Ordinance 546, 12/23/25). The Ordinance establishes a minimum density of 16 dwelling units/acre, so this analysis assigns a development potential of 16 units.	3.4 acres of the site are zoned O-Opportunity, and the remaining 1.16 acres are zoned X-Open Space which precludes residential development.

† In this table, the calculated density values have been rounded up to the nearest whole number. It is noted that State law expressly excludes accessory dwelling units from being included in density calculations.

*The remainder of the property (0.44 acres) does not have an -MF combining zone so it is not included in this analysis as a site for extremely low and acutely low income residential development. However, as discussed later in this section, the remainder portion is included in the emergency shelter sites inventory.

Figure 7-3 – Sites Meeting the RHNA Needs for Lower Income Households

Moderate and Above Moderate-Income Groups: As presented in Table 7-2, Blue Lake’s RHNA for the moderate and above moderate-income categories is 19 units. This will be accommodated through the development potential on the other 12 properties listed in Table 7-4. These properties have a combined development potential of 16 units.

One of the parcels, APN 025-141-007, is zoned MU which allows fourplexes as a principally permitted use. The 1.34-acre property has a developable area of approximately 4,000 square feet that is outside the portions of the property that have environmental constraints, and would allow a fourplex to be developed. The remainder of the property is within the mapped 100-year flood hazard area. Given the economies of scale multifamily housing development achieved, this analysis indicates the four units of development potential will meet the housing needs of moderate-income households.

This analysis assumes the development of at least three accessory dwelling units (ADUs) on unspecified properties with existing homes will accommodate the remaining moderate- and above-moderate income 7th Cycle RHNA. As discussed in section 1.0 above, five ADUs were permitted during the 6th Cycle Housing Element period on properties that were not in the residential land inventory. As such, the City is confident ADU development will accommodate the remaining RHNA for these income groups. All of these ADUs are assumed to be affordable to households in the above moderate-income category, as was reported by the City in their 2019 – 2027 annual reports of building permit activity to HCD.

5.0 Sites to Accommodate Emergency Shelters

5.1 State Law Requirements

This section evaluates the adequacy of sites to accommodate emergency shelters pursuant to AB 2339 (2022). Subparagraph (l) of Government Code § 65583(a)(4) requires Housing Elements to assess potential emergency shelter sites to determine if there are sufficient sites to accommodate the documented need for emergency shelters.

Pursuant to Government Code § 65583(a)(7), “the need for emergency shelter shall be assessed based on the capacity necessary to accommodate the most recent homeless point-in-time (PIT) count conducted before the start of the planning period”. The need for emergency shelter also factors the number of beds available on a year-round and seasonal basis, the number of shelter beds that go unused on an average monthly basis within a one-year period, and the percentage of those in emergency shelters that move to permanent housing solutions. The following assessment uses the 2024 PIT count. While the Humboldt Housing and Homeless Coalition, the region’s continuum of care (COC), organized and performed a PIT count in January 2026, the federal Department of Housing and Urban Development (HUD) has delayed releasing the data.

5.2 Need for Emergency Shelter

There are no permanent year-round emergency shelter beds available in Blue Lake. The Resource Center usually refers individuals seeking shelter to the Arcata House Partnership and the Eureka Resource Mission. During extreme weather events in the past, the Humboldt County Department of Health and Human Services has coordinated transportation for homeless persons to local emergency shelters.

Section 6.7 of Chapter 5 reviews the 2024 PIT count conducted by the Humboldt Housing and Homeless Coalition. According to the 2024 PIT count, there were 1,573 individuals experiencing homelessness countywide, of whom 1,194 were unsheltered (76%). In Blue Lake the PIT count identified 42 unsheltered persons experiencing homelessness.

This evaluation acknowledges that the PIT count methodology is not without flaws. A relevant flaw for Blue Lake is that the PIT count methodology does not allow volunteers to access private property to perform counts. Many of the properties that adjoin the city but are outside the city limits are large privately owned working lands that feature river bars. Personnel of the City and the Blue Lake Resource Center have observed there are encampments on some of these working lands, but the number of individuals is unknown. City employees and the Resource Center observe that the 2024 PIT count may overestimate the number of individuals who are unhoused and reside within Blue Lake city limits.

Nonetheless, to calculate whether Blue Lake has sufficient sites to accommodate the need for emergency shelter this assessment uses the number of persons who were counted as unsheltered in Blue Lake in the 2024 PIT count, (42 individuals), in the following formula:

$$42 \text{ persons} * 200 \text{ sq. ft. per person} = \text{total } 8,400 \text{ sq. ft.}^5$$

The result is that approximately 8,400 square feet of land is needed to accommodate the City's emergency shelter need.

As discussed in Section 6.7 of Chapter 5, emergency shelters are permitted by-right only in the Opportunity Zone (O Zone). All parcels zoned O were evaluated for proximity to amenities and services for people experiencing homelessness and for suitability for use as an emergency shelter as discussed below.

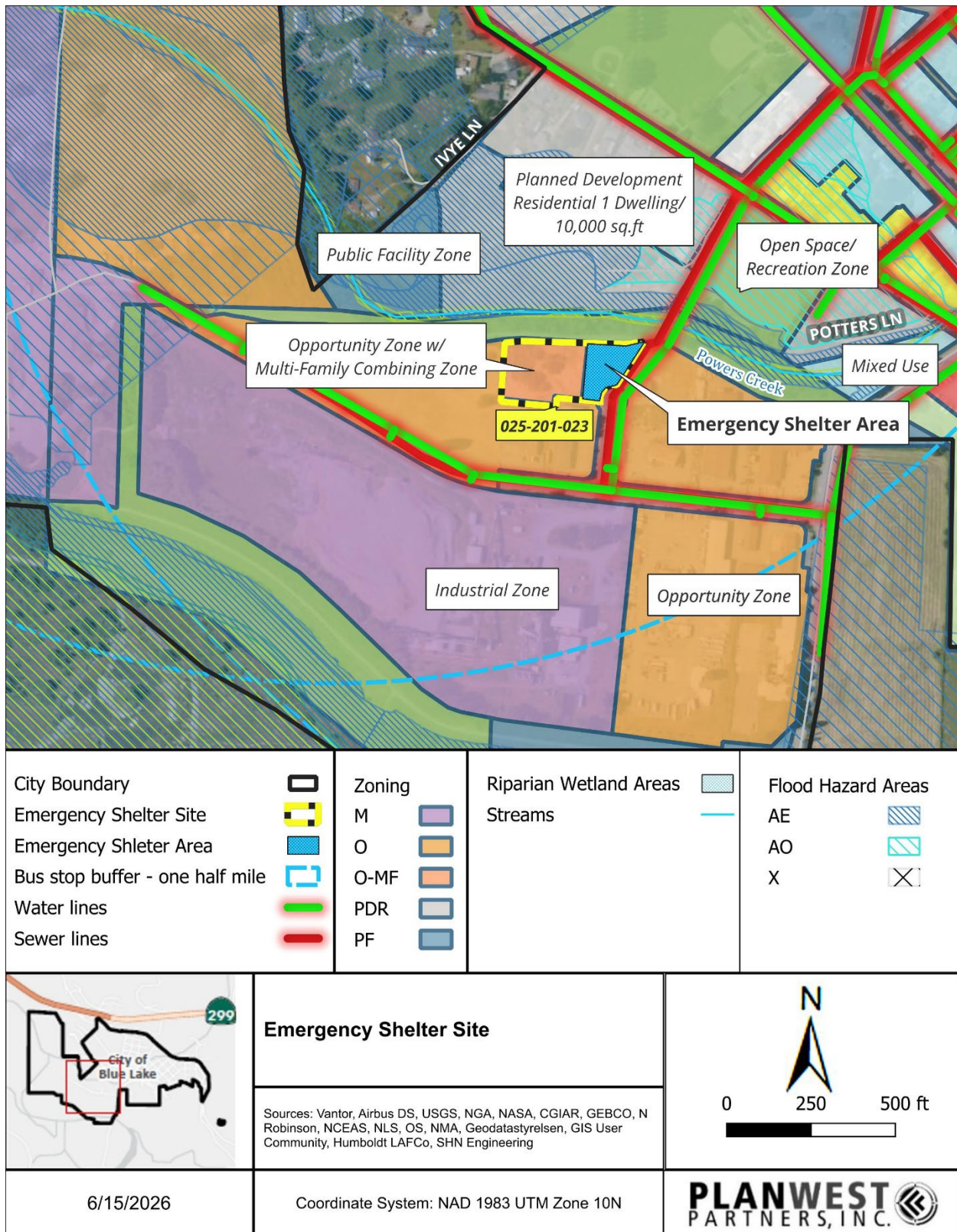
Table 7-5 – Emergency Shelter Site Assessment

Primary Variables	
Zoning	Only sites zoned O-Opportunity are included.
Vacant Lands	Only sites that are vacant are included.
Proximity to transit	Sites must be located within a ½ mile from a transit stop.

⁵ Pursuant to Government Code § 65583(a)(4)(l) the “200 square feet per person” factor used in the formula to calculate emergency shelter need herein is intended only for calculating site capacity pursuant to the cited Government Code section, and shall not be constructed as establishing a development standard applicable to the siting, development, or approval of a shelter.

Primary Variables	
Environmental Constraints	Environmental constraints for flooding, very high fire hazard rating, brownfields, wetlands, streams and water bodies were assessed using publicly available information as discussed above. Sites containing these environmental constraints were removed from consideration.
Availability of public water and sewer systems	Only sites that have public water and sewer available during the planning period are included.
Proximity to retail outlets and health care facilities	The Humboldt Transit Authority (HTA) is the sole public transit provider serving Humboldt County residents. As part of its intercity Arcata/Blue Lake/Willow Creek route, HTA services two bus stops in Blue Lake that are within ½ mile of all the O-zoned sites. HTA's Arcata/Blue Lake/Willow Creek route has two stops in Arcata that connect to the Arcata and Mad River(A&MRTS) service. The A&MRTS provides service to retail outlets and health care facilities within 600 feet of the transit stops.

The result of this analysis yields one site on APN 025-201-023 with the appropriate zoning and other qualifying characteristics - the 19,000 square foot (0.44 acre) portion zoned O – Opportunity. The location of the site is shown below in Figure 7-4.

Figure 7-4 – Emergency Shelter Site

This same APN has a one-acre portion with a -MF Combining Zone that is included in the residential land inventory for lower income households as discussed earlier in this section. The analysis demonstrates that Blue Lake has an adequate site to meet the local need for emergency shelters.

The City does not have an emergency shelter project in the development pipeline. To ensure the City maintains its emergency shelter capacity throughout the 7th Cycle planning period and that its actions are consistent with Affirmatively Further Fair Housing, Program HI-8(C) commits the City to ensuring the City has adequate and suitable sites available to accommodate its emergency shelter needs at all times throughout the planning period. Similar to No Net Loss Law, Program HI-8(C) also obligates the City to replace an emergency shelter capacity reduction in a timely manner.

6.0 Other Sites Suitable for Residential Development

This section identifies other available properties in Blue Lake that could provide housing beyond the 7th RHNA obligation because a jurisdiction's RHNA is the minimum projection of the additional housing needed to accommodate projected household growth for the planning period. Recognizing the earlier constraints analysis for parcels in the land inventory may be overly conservative in its assumptions for eliminating potential building sites, this section includes sites that have constraints precluding them from being considered for meeting the RHNA but still may be able to support the development of a variety of housing. For example, the AO floodplain designation is a constraint that eliminates properties from the RHNA land inventory, but with proper engineering, building codes and the City's floodplain management regulations allow homes to be constructed within the AO flood hazard area.

This more relaxed sites constraint analysis considers additional sites to be available for residential development during the 7th cycle based on the following factors:

- All sites are zoned to allow residential development. Only sites zoned R-1, R-3, PDR, MU and O are included in this analysis.
- Sites are not on a brownfield and do not have a Very High Fire Hazard Severity Rating.
- All sites have public sewer and water connections available at the property or this infrastructure is available during the 7th cycle. Dry utilities are available at the site or are available during the 7th cycle for all included sites.
- Vacant properties have developable areas that are 400 square feet or larger in size.
- Non-vacant properties are included when they have existing development on less than one third of the property and an undeveloped area that could accommodate a new home of 400 square feet or larger in size.
- The analysis assumes only one new dwelling unit would be constructed per site and the new homes will be only affordable to Above Moderate-Income households.

This analysis identifies 33 additional sites not included in the 7th Cycle Residential Land Inventory that could be developed with homes during the planning period. Figure 7-5 shows

the location of these sites, and Table 7-5 provides a listing of these properties. Combined together these sites have an assumed development potential of 33 units. As mentioned earlier, in addition to these properties, this Housing Element assumes the City's ADU program will lead to three ADUs being constructed during the 7th Cycle period on other unspecified properties in the City that are already developed with existing single-family residences. This is the same number of ADUs built during the 6th Cycle Housing Element.

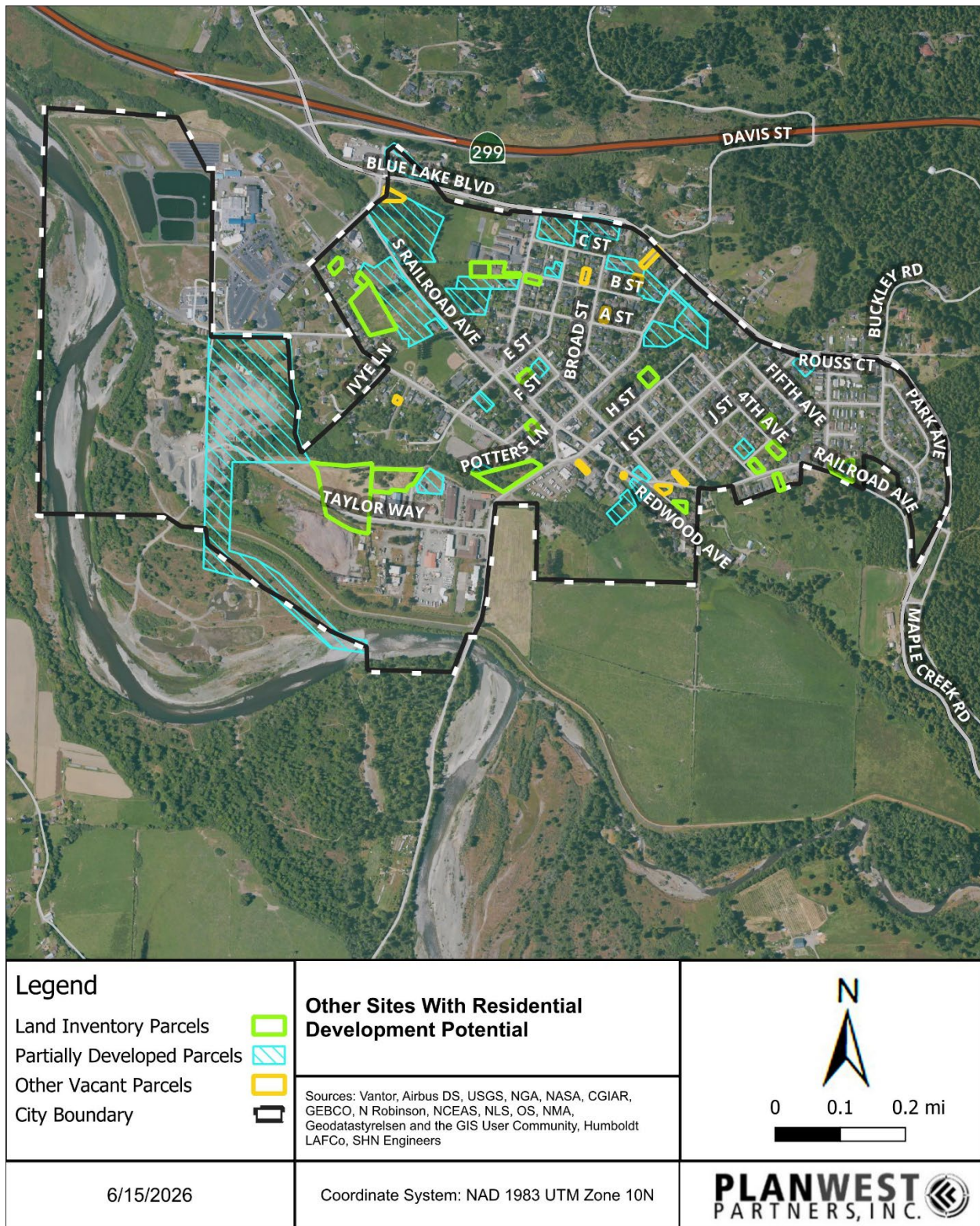
Figure 7-5 – Other Sites With Residential Development Potential

Table 7-6 – List of Other Properties With Residential Development Potential

APN	Total Acreage	GP Des.	Zoning	# of units	Assumed Income Category
Vacant Sites					
025-033-015	0.08	MD	R1	1	Above Moderate/Moderate
025-041-030	0.14	MD	R1	1	Above Moderate/Moderate
025-041-036	0.13	MD	R1	1	Above Moderate/Moderate
025-041-042	0.24	MD	R1	1	Above Moderate/Moderate
025-067-024	0.14	MD	R1	1	Above Moderate/Moderate
025-083-008	0.03	C	MU	1	Above Moderate/Moderate
025-084-018	0.15	MD	R1	1	Above Moderate/Moderate
025-091-002	0.1	C	SC	1	Above Moderate/Moderate
025-111-006	0.29	MD	PDR	1	Above Moderate/Moderate
025-121-043	4.62	MD	PDR	1	Above Moderate/Moderate
025-131-020	0.06	LD	PDR	1	Above Moderate/Moderate
Subtotal	5.58			11	
Non-Vacant Sites					
025-111-001	1.23	n/a	n/a	1	Above Moderate/Moderate
025-064-009	1.53	MD	R1	1	Above Moderate/Moderate
025-064-005	1.14	MD	R1	1	Above Moderate/Moderate
025-063-008	0.25	MD	R1	1	Above Moderate/Moderate
025-075-028	0.3	MF	MU	1	Above Moderate/Moderate
025-071-011	0.3	MD	MU	1	Above Moderate/Moderate
025-041-015	0.74	MD	R1	1	Above Moderate/Moderate
025-041-006	0.83	MD	R1	1	Above Moderate/Moderate
025-181-010	1.03	MD	R1	1	Above Moderate/Moderate
025-181-012	1.37	MD	R1	1	Above Moderate/Moderate
025-022-010	0.49	MD	R1	1	Above Moderate/Moderate
025-032-005	0.31	MD	R1	1	Above Moderate/Moderate
025-191-015	0.52	MD	PDR	1	Above Moderate/Moderate
025-141-011	0.2	MD	PDR	1	Above Moderate/Moderate
025-201-018	0.74	I	O	1	Above Moderate/Moderate
312-161-020	25.92	I, A	M, O, X	1	Above Moderate/Moderate
025-101-013	1.11	MD	PDR	1	Above Moderate/Moderate
025-101-007	1.29	MD	PDR	1	Above Moderate/Moderate
025-111-007	4.88	MD	PDR	1	Above Moderate/Moderate
025-084-018	0.15	MD	R1	1	Above Moderate/Moderate
025-083-016	0.29	MD	MU	1	Above Moderate/Moderate
025-081-006	0.2	C	MU	1	Above Moderate/Moderate

APN	Total Acreage	GP Des.	Zoning	# of units	Assumed Income Category
025-082-011	0.7	MF	R3	1	Above Moderate/Moderate
Subtotal	45.00			22	
Grand Total	50.58			33	