

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.

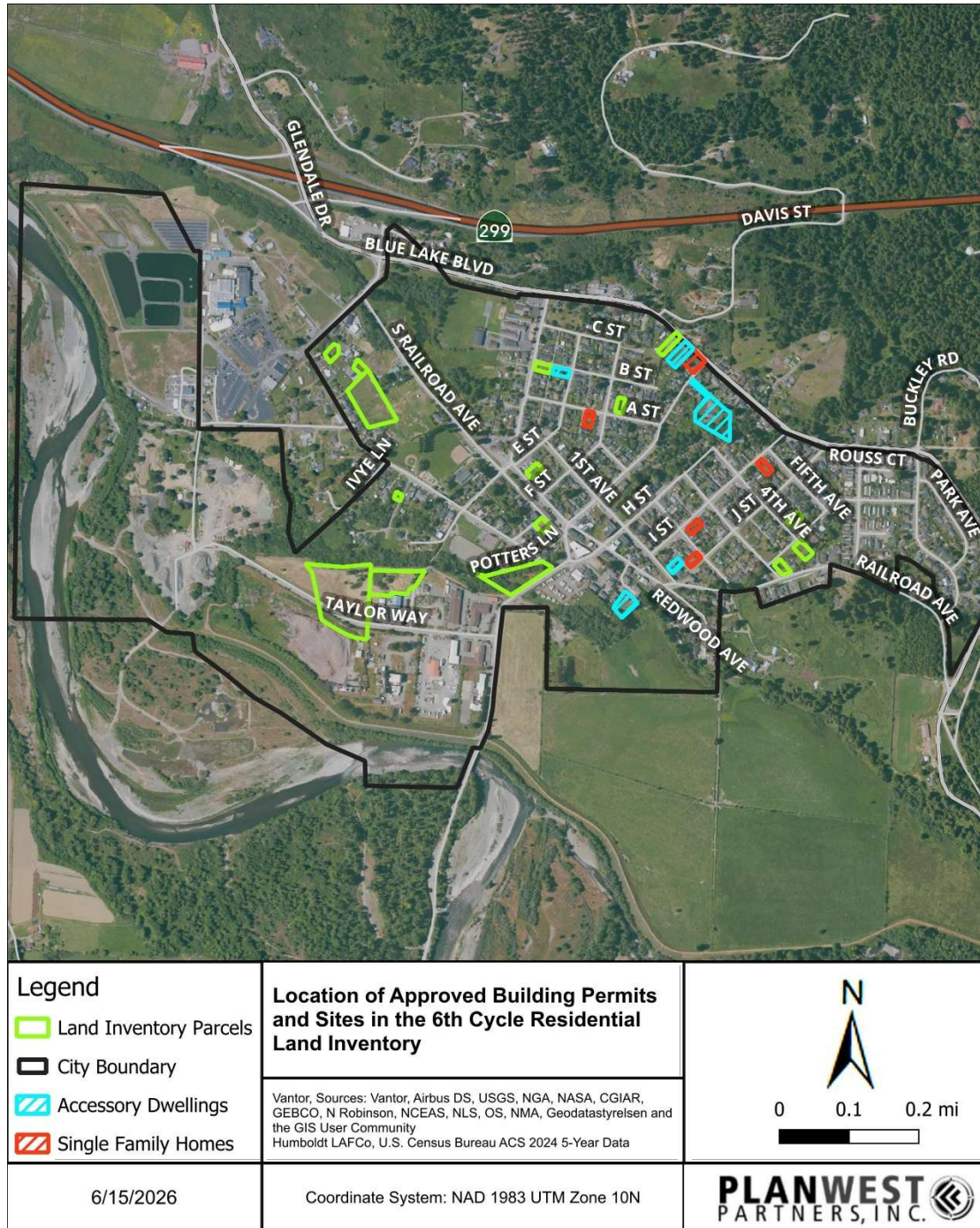
It appears that four of the new residences permitted are replacements of existing single-family homes. Figure 7-1 below shows the 6th Cycle land inventory parcels (green), properties with new ADU permits (red), and other new permitted residences (blue).

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

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.

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 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
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%.

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.

- 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

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 not 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 status of the City's inventory 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

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.

of those sites were developed during the 6th Cycle planning period. However, there are notable differences. Readers of this section are advised of the following:

- The sites inventory is neither a comprehensive list nor an exhaustive list of the parcels suitable for residential development.
- Inclusion of a parcel in the sites inventory does not change or modify an existing entitlement for that parcel. Also, inclusion of a parcel in the sites inventory does not constitute an entitlement.
- A parcel that is not included in the sites inventory, but is designated by the General Plan and/or zoned for residential development, can be developed for residential purposes in accordance with the Blue Lake Zoning Ordinance and State housing law (e.g., Housing Accountability Act, ADU law, etc.).
- Inclusion in the sites inventory does not guarantee developability, as the constraints analysis that has been conducted is at the programmatic level using existing information.
- Private property owners are not required to build housing at identified income categories or at the realistic capacity values projected in the Housing Element. Properties must be developed in accordance with the Blue Lake Zoning Ordinance and applicable State law. Program HI-8 commits the City to ongoing and continuous monitoring of the remaining capacity of its sites inventory and the remaining unmet RHNA at all times during the 7th Cycle, and to take specific actions should a shortfall by income category be projected. The fact that a parcel is included in the site's inventory does not, in itself, change the General Plan land use designation or zoning of a listed parcel.

Figure 7-2 – Proposed 7th Cycle Residential Land Inventory

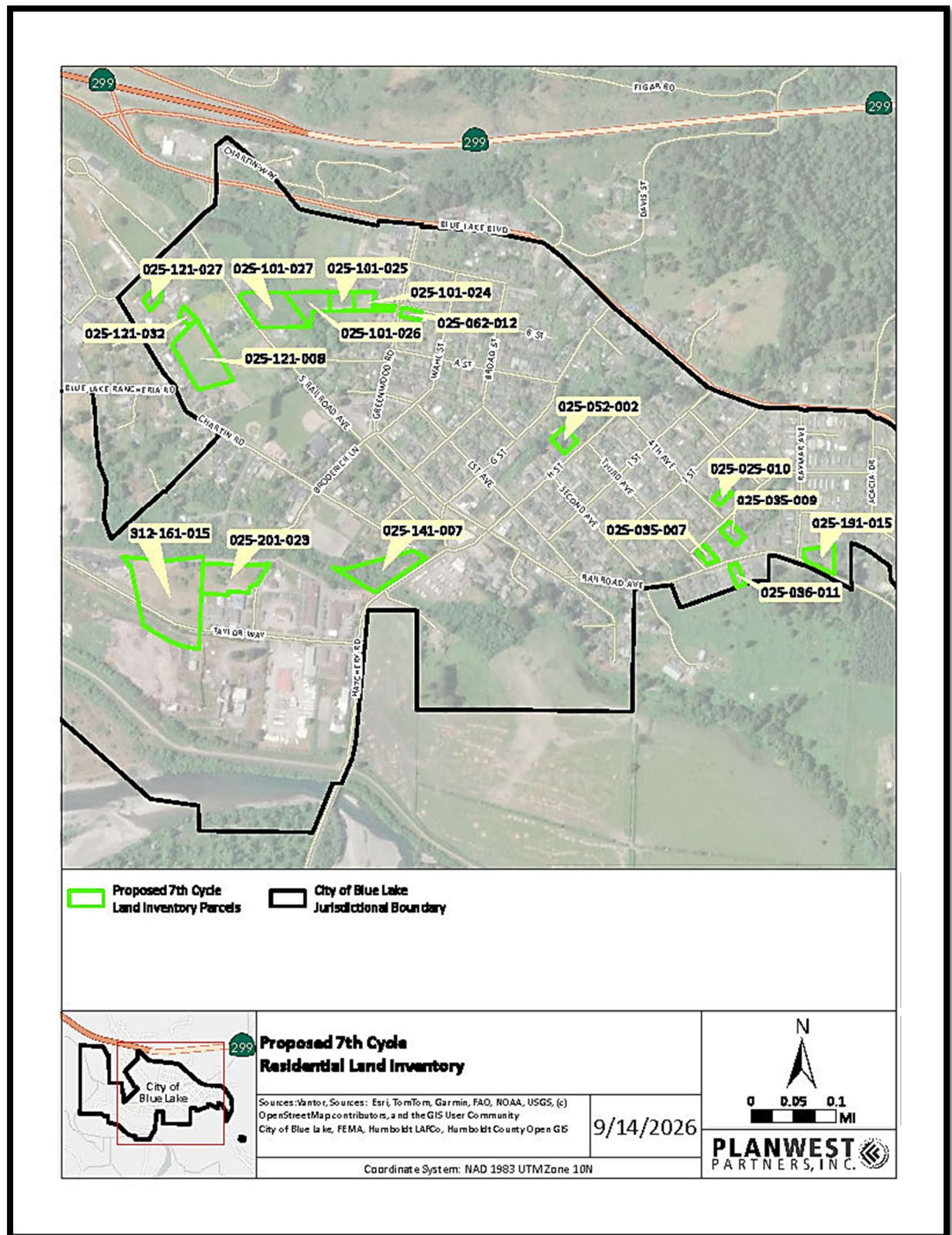


Table 7-3 – Detail of Proposed 7th Cycle Residential Land Inventory

APN	Acreage (Ac.)	Residentially Zoned Ac.	GP Des.	Zoning	Realistic Capacity (# 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
025-101-024	0.41	0.41	MD	PDR	5*	Above Moderate
025-101-025	0.40	0.40	MD	PDR	5*	Above Moderate
025-101-026	0.74	0.74	MD	PDR	6**	Moderate
025-101-027	1.51	1.51	MD	PDR	5*	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
17 sites	14.4	12.8			92	

Notes: ^{1,2} See Table 7-4below.

* Each site has an existing entitlement for the development of one (1) single family residence and one (1) ADU. The realistic capacity accounts for the entitled units plus ADU and JADU units consistent with Government Code (GC) § 66323. This GC section mandates that the City allow on single-family lots, by-right, at least one ADU constructed from proposed space, one JADU, and one newly constructed detached ADU, and that the existing entitled ADU is that allowed pursuant to GC § 66314.

** This site has an existing entitlement for the development of two (2) duplexes, totaling 4 units. The realistic capacity accounts for the entitled units plus ADU units consistent with GC § 66323. This GC section mandates that any site that has an existing or proposed multifamily structure (i.e., duplex or greater) is allowed up to two detached ADUs by-right.

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.

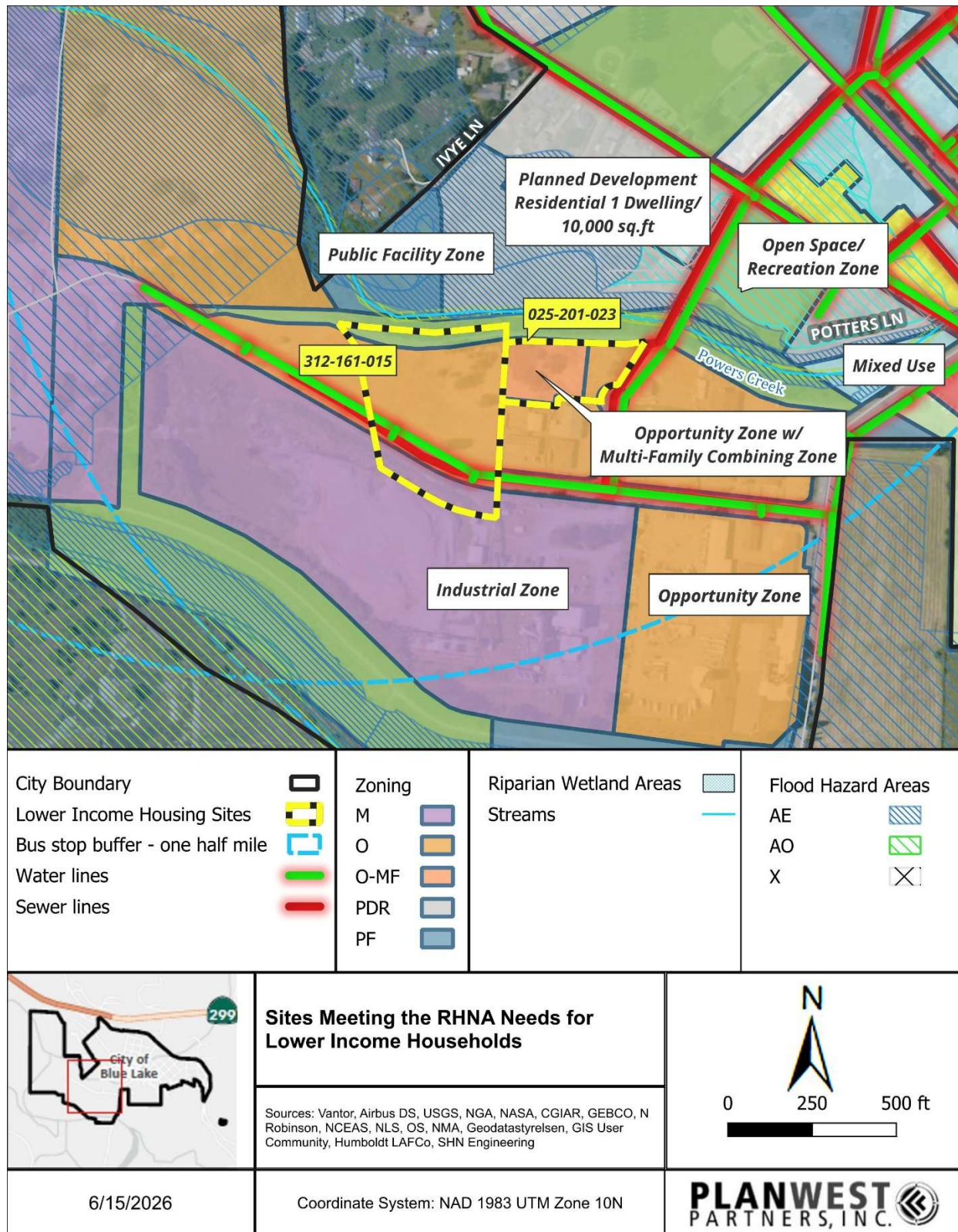
All essential infrastructure, i.e., community water, sewer, power, internet, and phone are available at these sites. The sites are also located within ½ mile from a transit stop at City Hall which provides daily access to numerous shopping and medical services in Arcata, and connects to other buses to 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.

Public Comment

At the request of the property owner of APNs 025-101-024, 025-101-025, 025-101-026, and 025-101-027, these parcels have been added to the sites inventory (see Table 7-3). The owner also requested an increased realistic capacity value for each parcel in the development, greater than the existing entitlement. The requested increase yields a density range of approximately 12 to 13 dwelling units per acre when calculated across all of the APNs. When the density calculated on a parcel by parcel basis, the density range increases from 14 to 19 units per acre and 15 to 20 units per acre. All of the parcels have a maximum General Plan density of 7.26 units per acre. An increase exceeding the General Plan density requires a Zoning Map amendment to add a Special Density Combining Zone, and possibly a General Plan amendment. An alternative route to increase the number of units above the realistic capacity values shown in Table 7-3 is to develop a project eligible for density increases as provided by State Density Bonus Law.

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. [Arcata House Partnership operates adult and family emergency shelters in four Arcata locations, with the closest about 6 miles west of Blue Lake.](#) 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.

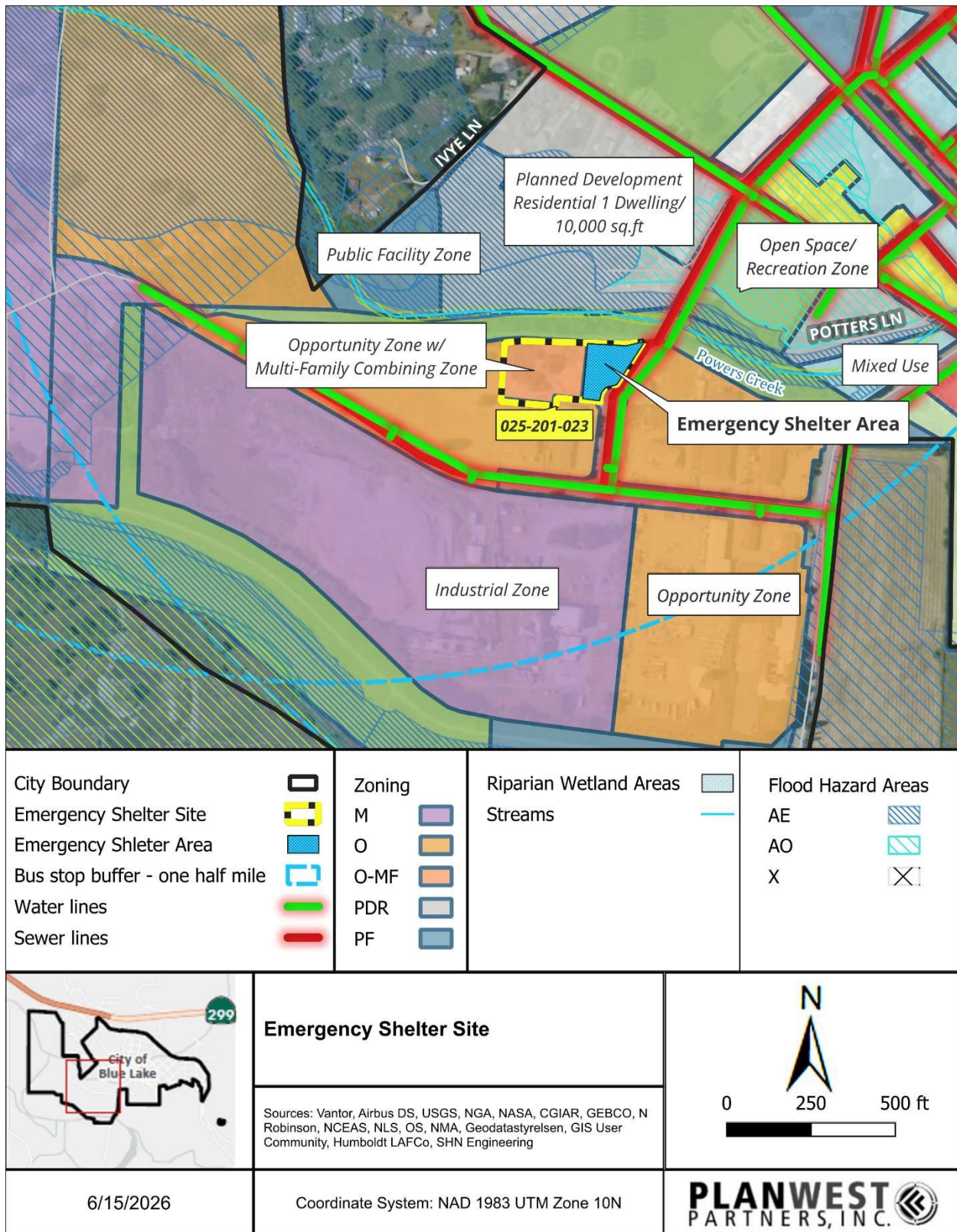
As discussed in Section 6.7 of Chapter 5, emergency shelters are permitted by-right only in the Opportunity Zone (O Zone). All parcels zoned O were evaluated for proximity to amenities and services for people experiencing homelessness and for suitability for use as an emergency shelter as discussed below.

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.
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.

⁵ Pursuant to Government Code § 65583(a)(4)(I) 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.

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

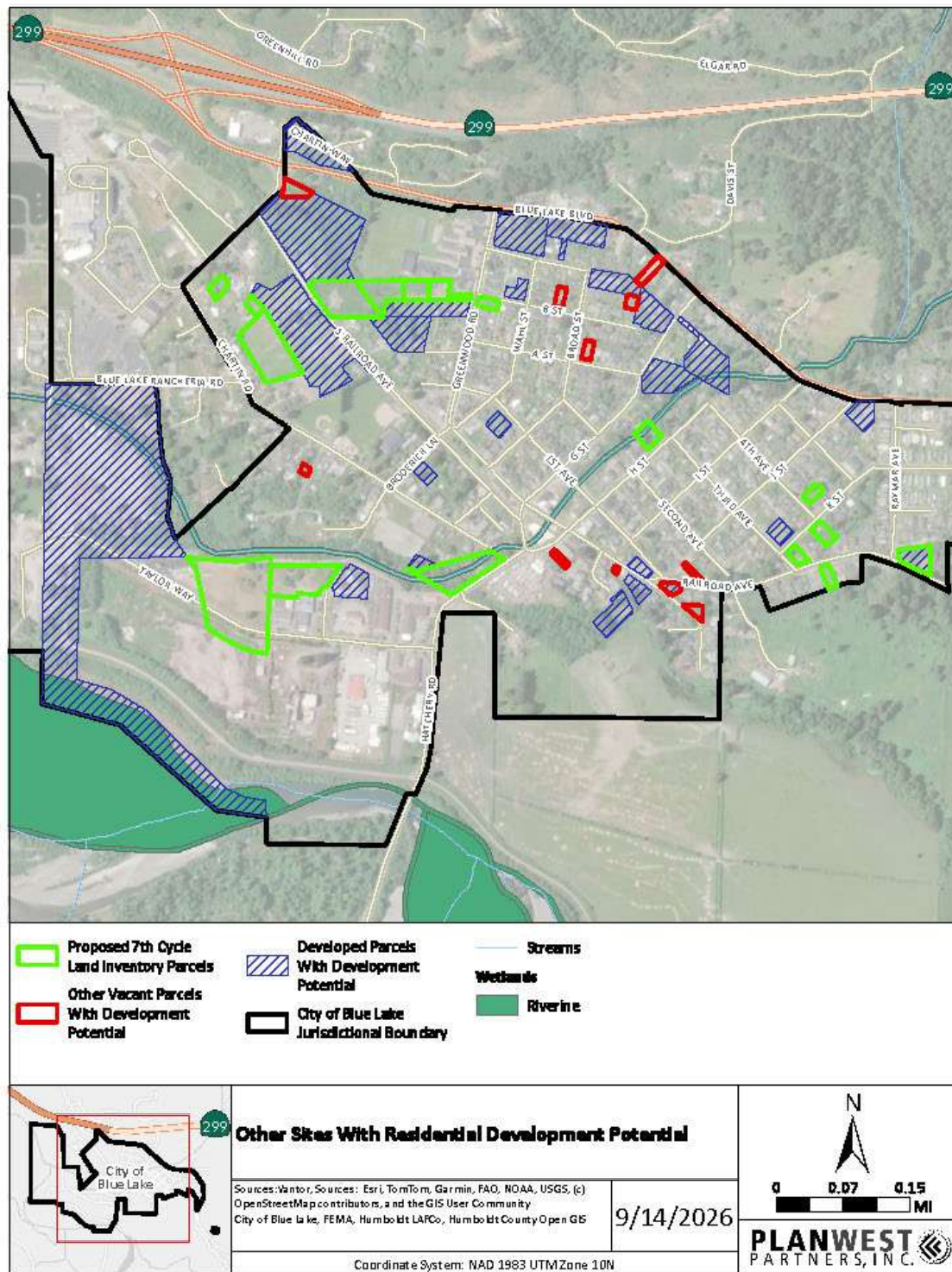


Table 7-6 – List of Other Properties With Residential Development Potential

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
025-084-008	0.13	MD	R1	1	Above 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	5.71			12	
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

APN	Total Acreage	GP Des.	Zoning	# of units	Assumed Income Category
025-081-006	0.2	C	MU	1	Above Moderate/Moderate
025-082-011	0.7	MF	R3	1	Above Moderate/Moderate
Subtotal	45.00			22	
Grand Total	50.71			34	