

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

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

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, 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 – Review of 6th Cycle Housing Element Programs

6th Cycle Program	Program Objective and Time Frame	Status of Implementation	Appropriateness and Update for 7th Cycle
HI-1: Accessory Dwelling Units	<p>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.</p> <p><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.</p>	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	<p>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.</p> <p><u>Time Frame:</u> Amend the Zoning Code by December 2024.</p>	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.

6th Cycle 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.

6th Cycle 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

6th Cycle 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	<p>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.”</p> <p><u>Time Frame:</u> Amend the Zoning Code by December 2024.</p>	In Progress	<p>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</p>
HI-2	<p>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.</p> <p><u>Time Frame:</u> Review zoning in 2023. Make any necessary revisions December 2024.</p>	In Progress	<p>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</p>

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

6th Cycle 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

6th Cycle Program	Program Objective and Time Frame	Status of Implementation	Appropriateness and Update for 7th Cycle
	<p>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.</p> <p><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.</p>		<p>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:</p> <ul style="list-style-type: none"> • 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	<p>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.</p> <p><u>Time Frame</u>: Ongoing; as projects are processed, and program informational materials are made available.</p>	Continuous	<p>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.</p>

6th Cycle 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

6th Cycle 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	<p>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:</p> <ul style="list-style-type: none"> – 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.

6th Cycle Program	Program Objective and Time Frame	Status of Implementation	Appropriateness and Update for 7th Cycle
	<p>completing Census questionnaires.</p> <ul style="list-style-type: none"> – Review the Zoning Code and other City codes and policies for consistency with the fair housing law. <p><u>Time Frame</u>: Create Plan within three years of adoption of the Housing Element, and implement on an ongoing basis.</p>		
HI-11	<p>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:</p> <ul style="list-style-type: none"> – 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 <p><u>Time Frame</u>: As feasible, hold annual meetings between the City Council, Economic Development Commission, and Business Community.</p>	Continuous	<p>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</p>

6th Cycle 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.

6th Cycle 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

6th Cycle 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	<p>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.</p> <p><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.</p>	Continuous	<p>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.</p>
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 .

6th Cycle 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	<p>To remove potential constraints to the development of multi-family housing, the City shall amend the following development standards in the Zoning Code:</p> <ul style="list-style-type: none"> – 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	<p>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</p>

6th Cycle 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: <ul style="list-style-type: none"> 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".

6th Cycle 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

6th Cycle 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	<p>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.).</p> <p><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.</p>	Continuous	<p>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).</p>