



MEMORANDUM

TO: Trinidad Planning Commission
FROM: Trever Parker, City Planner
DATE: March 31, 2020
RE: April 1, 2010 Agenda Packet Addendum

The draft Housing Element was submitted to the Department of Housing and Community Development for review and comment. They have requested some revisions to the document. Only those pages with revisions are included.

Implementation Programs

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

- **Accessory Dwelling Units (ADUs).** Allow Accessory Dwelling Units (ADU) in accordance with ensure Assembly Bill 2299 and Senate Bill 1069. Coordinate with the California Coastal Commission for review and ultimate inclusion into the City’s Local Coastal Program (LCP). [Consider adopting a Junior Accessory Dwelling Unit \(JADU\) ordinance to allow for a simple and affordable housing option.](#)
- **Manufactured housing/Mobile homes.** Allow manufactured housing and mobile homes in the same manner and in the same zone as a conventional or stick-built structures are permitted (Government Code Section 65852.3).
- **Single Room Occupancy Units (SROs).** Define and allow with a use permit in the Planned Development (PD) Zoning District.
- **Transitional and Supportive Housing.** Define supportive housing. Permit transitional and supportive housing as permitted uses subject to only the same restrictions on residential uses contained in the same type of structure. In addition, 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 multifamily uses.
- **Emergency Shelters.** Allow by-right, without discretionary review, in the [Public Facilities Commercial \(PFC\)](#) zoning district.
- **Employee Housing.** Comply with the State Employee Housing Act (Health and Safety Code Sections 17021.5 and 17021.6).
- **Density Bonus.** Comply with state density bonus law (Government Code Section 65915, as revised). Promote the density bonus through informational brochures which will be displayed at City Hall
- **Reasonable Accommodation.** Develop and formalize a process that a person with disabilities will need to go through to make a reasonable accommodation request in order to accommodate the needs of persons with disabilities and streamline the permit review process. The City will provide information to individuals with disabilities regarding reasonable accommodation policies, practices, and procedures based on the guidelines from HCD. This information will be available through postings and pamphlets at the City and on the City’s website.
- **Residential Care Facilities.** Allow for residential care homes with six or fewer persons by right in all residential zones subject only to the same restrictions in that zone; and allow larger group homes of seven or more persons in the UR and SR zoning districts with a conditional use permit. Additionally, the City will amend the Zoning Ordinance to update its definition of “family” to be “One or more persons living together in a dwelling unit.”

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

Time Frame: Amend the Zoning Ordinance by January 2022, with the exception of allowing emergency shelter by-right, which will be completed concurrently with adoption of this Housing Element. [Consider adoption of a JADU ordinance by January 2022.](#) Amendments are dependent on the California Coastal Commission review process.

Funding Source: General Fund and or grants

Responsibility: City Council, City Clerk, and Planning Staff

Time Frame: Develop an outreach program within two years of adopting the Housing Element to assist persons with development disabilities.

Funding Source: General Fund

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

Responsibility: City Council, City Clerk, and Planning Staff

Time Frame: Ongoing, as projects approach expiration.

Funding Source: General Fund

- H-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 modify the process for objectivity and replace the use permit process with design review process, consistent with Health and Safety Code requirements.~~shall monitor the use permit process on multi-family applications to determine whether or not the process impacts the development of multi-family units. During the annual report to the Planning Commission, an assessment shall be made of multi-family projects considered during the year. If it is determined that the use permit process impacts the timing, cost, or supply of multi-family housing, the City shall reconsider its position on this matter and adopt mitigations, which could include eliminating the use permit process.—~~

In addition, to comply with new housing laws, the City will rezone all sites zoned PD to allow residential use by-right. This by-right (without discretionary review) requirement is only for housing developments in which at least 20 percent of the units are affordable to lower-income households.

Responsibility: City Council, City Clerk, and Planning Staff

Time Frame: ~~Ongoing, as projects are processed~~Modify the process by January 2022. Rezone all sites zoned PD to allow residential use by-right within 3 years from adoption of this Housing Element.

Funding Source: General Fund

- 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.

Responsibility: City Council, City Clerk, and Planning Staff

Time Frame: Review by August 2020, revise as necessary by January 2022.

Funding Source: General Fund

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

Responsibility: City Council, City Clerk, and Planning Staff

Time Frame: Set up a process by January 2022, ongoing as projects are processed.

Funding Source: General Fund

HI-17 As water conservation is a priority, the City plans to consider the following as possible ways to conserve water:

– Change the rate structure to encourage conservation and developing a drought contingency plan that would require cutbacks as certain milestones/low flows are reached

– Creating a water efficient landscape ordinance

– Look into limiting individual water use based on a contract at the time of connection

– Incorporate review of water use as part of permit approvals

Responsibility: City Council, City Clerk, and Planning Staff

Time Frame: Review water conservation possibilities by January 2022, once identified, develop a procedure(s) by January 2023.

Funding Source: General Fund

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

Responsibility: City Council, Planning Commission, and Planning Staff

Time Frame: Review zoning by 2022. Make revisions by June 30, 2023.

Funding Source: General Fund

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

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

Responsibility: City Council and City Clerk

Time Frame: Ongoing, as programs are available

Funding Source: General Fund

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

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

Time Frame: Annually apply as NOFAs are released.

Funding Source: CalHome and other available funding sources

HI-5 To encourage development of housing for lower- income households including, extremely low income households, senior, single parent, and disabled households, 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; providing expedited processing; identifying grant and funding opportunities; applying for or supporting applications for funding on an ongoing basis; reviewing and prioritizing local funding at least twice in the planning period; and/or offering additional incentives beyond the density bonus.

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

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

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

Funding Source: General Fund, CDBG funds

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

Responsibility: City Council, Planning Commission, and Building Inspector

Time Frame: Ongoing, as projects are processed.

Funding Source: General Fund

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

Responsibility: City Council, Planning Commission, and Planning Staff

Time Frame: Annually review, develop a SB 35 streamlining approval process by January 2021.

Funding Source: General Fund

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

Responsibility: City Building Inspector

Time Frame: Ongoing, as projects are processed.

Funding Source: General Fund

HI-9 Consider requesting a local organization involved in housing rehabilitation (e.g. Redwood Community Action Agency (RCAA)) to survey the City of Trinidad’s housing stock as an initial step for establishing a housing rehabilitation program for targeted income groups. Once the survey is completed, the City will pursue funding and programs as appropriate.

Responsibility: City Council

Time Frame: Reach out to RCAA by January 2022, if funding is available, complete survey by January 2022. Pursue funding and programs at least twice in the planning period.

Funding Source: General Fund

Responsibility: City Council, City Clerk, and Planning Staff

Time Frame: Develop an outreach program within two years of adopting the Housing Element to assist persons with development disabilities.

Funding Source: General Fund

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

Responsibility: City Council, City Clerk, and Planning Staff

Time Frame: Ongoing, as projects approach expiration.

Funding Source: General Fund

- H-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 modify the process for objectivity and replace the use permit process with a site plan review, consistent with Health and Safety Code requirements.~~shall monitor the use permit process on multi-family applications to determine whether or not the process impacts the development of multi-family units. During the annual report to the Planning Commission, an assessment shall be made of multi-family projects considered during the year. If it is determined that the use permit process impacts the timing, cost, or supply of multi-family housing, the City shall reconsider its position on this matter and adopt mitigations, which could include eliminating the use permit process.—~~

In addition, to comply with new housing laws, the City will rezone all sites zoned PD to allow residential use by-right. This by-right (without discretionary review) requirement is only for housing developments in which at least 20 percent of the units are affordable to lower-income households.

Responsibility: City Council, City Clerk, and Planning Staff

Time Frame: ~~Ongoing, as projects are processed~~Modify the process by January 2022. Rezone all sites zoned PD to allow residential use by-right within 3 years from adoption of this Housing Element.

Funding Source: General Fund

- 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.

Responsibility: City Council, City Clerk, and Planning Staff

Time Frame: Review by August 2020, revise as necessary by January 2022.

Funding Source: General Fund

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

Responsibility: City Council, City Clerk, and Planning Staff

Time Frame: Set up a process by January 2022, ongoing as projects are processed.

Funding Source: General Fund

HI-17 As water conservation is a priority, the City plans to consider the following as possible ways to conserve water:

– Change the rate structure to encourage conservation and developing a drought contingency plan that would require cutbacks as certain milestones/low flows are reached

– Creating a water efficient landscape ordinance

– Look into limiting individual water use based on a contract at the time of connection

– Incorporate review of water use as part of permit approvals

Responsibility: City Council, City Clerk, and Planning Staff

Time Frame: Review water conservation possibilities by January 2022, once identified, develop a procedure(s) by January 2023.

Funding Source: General Fund

Quantified Objectives

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

Table 2: Quantified Objectives, 2019–2027

	Income Category					Total
	Extremely Low	Very Low	Low	Moderate	Above Moderate	
New Construction (1)	2	2	4	3	7	18
Rehabilitation (2)			<u>2</u>	<u>2</u>		<u>4</u>
Preservation (3)						
Total	2	2	<u>46</u>	<u>35</u>	7	<u>1822</u>

Source: City of Trinidad, March 2020

(1) New construction objectives are based on the Regional Housing Needs Allocation

(2) There is not currently a funded rehabilitation program in place with the County.

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

Homeless Persons

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

According to the 2019 Point-In-Time count released by the Humboldt County Department of Health and Human Services, there were approximately 1,473 people without shelter in Humboldt County. Of this count, only 6 persons were identified in Trinidad.

Students

College students are typically income limited individuals in need of inexpensive rental housing. Students from nearby Humboldt State University (HSU) and College of the Redwoods make up a small portion of Trinidad's population. In 2016, two residents (0.6% of the total population) were enrolled in college or graduate school. Of these, none were between the ages of 18-24, indicating that the two residents enrolled in college were age 25 or older at that time. According to the 2012-2016 ACS 5-Year Estimates, both residents in the City were female.

Traditionally, college students between the ages of 18-24 reside in the less expensive section of the City's housing stock (e.g. second units, mobile homes, trailers, studios, etc.) or share single-family dwelling units. Considering that the City's student population is over the age of 25, they may not necessarily be as income limited and in need of smaller inexpensive housing units. These individuals may live in family households in larger single-family dwelling units. Due to the high cost of housing and distance from local colleges, the City of Trinidad has not traditionally been a highly desirable location for college students to live.

Coastal Zone Analysis

The entire City of Trinidad is within the coastal zone. The City is required to review coastal-zone affordable-housing obligations including the preservation of existing occupied units affordable to low- or moderate-income households and where feasible include low- and moderate-income housing in new developments.

To comply with Section 65590 and determine whether the affordable housing stock in the coastal zone is being protected and provided as required, new construction, demolition, conversion, and replacement housing units for low- and moderate-income households within the coastal zone is summarized below.

- There have been approximately 55 housing units constructed since 1980.
- The City does not require the development of affordable housing units.
- There are no affordable housing units that have been authorized to be demolished or converted and therefore no need for replacement.

Housing Resources and Opportunities

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

Regional Housing Need

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

Table 20 shows the City’s regional housing need by income for the projection period beginning December 31, 2018, and ending August 31, 2024.

Table 20: Regional Housing Need, 2018–2027

Income Group	Total RHNA
Very Low*	4
Low	4
Moderate	3
Above Moderate	7
Total	18

Source: City of Trinidad, March 2020

*Note – it is assumed that 50% of the very low income RHNA is allocated towards extremely low income.

Unaccommodated Need

The City of Trinidad did not adopt a Housing Element for the 5th cycle and therefore has an unaccommodated need of 5 units. The sites included in this Housing Element were available and appropriately zoned during-prior to, and during the 5th cycle and had the capacity to accommodate all 5 units. Therefore, the City does not have a carry over.

Table 21: Unaccommodated Regional Housing Need, 2014–2019

Income Group	Total RHNA
Very Low	2
Low	0
Moderate	1
Above Moderate	2
Total	5

Source: City of Trinidad, March 2020

Alternate Affordable Housing Options

Another option to meet a portion of the City’s RHNA is through accessory dwelling units (ADU) and junior accessory dwelling units (JADU). ADUs are permitted on lots that are a minimum of 40,000 square feet (.92 acres). **Table 23** identifies six sites that are of that size or larger, and based on the nature of this type of unit’s affordability, the City has assumed a credit of six units towards meeting the lower-income RHNA. The City has also considered the possibility of relying on JADUs as another affordable housing option which will allow for additional capacity towards meeting the City’s lower income RHNA. The City has included program HI-1 to amend the ADU standards to ensure compliance with State Law and consider adoption of a JADU ordinance to allow for an affordable housing option.

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

Currently, there are 188 single family homes in the City. Based on trends from surrounding comparable jurisdictions, the City has taken a conservative approach and assumed that at least five single family units (2.6 percent of the total units) would allow for a JADU during the planning period. This capacity, coupled with the City’s current ADU capacity, identifies that the City is able to meet its lower-income RHNA (**Table 22**).

Meeting the Regional Housing Need

Table 22 compares the City of Trinidad’s RHNA for the 6th cycle planning period to the available site inventory capacity.

The City has a surplus of 26-37 units available to lower-income households (including extremely low-, very-low, and low-income households) and 26 units available to moderate- and above-moderate-income households, a total surplus of 52-64 units.

Table 22: Comparison of Regional Growth Need and Residential Sites

Income Group	2018–2027 RHNA	<u>ADU/JADU Capacity</u>	Site Capacity	RHNA Surplus
Very Low	4	<u>11</u>	34	<u>2637</u>
Low	4			
Moderate	3		8	5
Above Moderate	7		28	21
Total	18	<u>11</u>	<u>7082</u>	<u>5264</u>

Source: City of Trinidad, March 2020

Emergency Shelters

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

Senate Bill 2 (Cedillo, 2007) requires jurisdictions to allow emergency shelters and transitional housing without a conditional use permit. The City must identify a zone or zones where emergency shelters will be allowed as a permitted use without a conditional use permit or other discretionary permit. The zone or zones identified must have land available to accommodate an emergency shelter.

The City of Trinidad’s Municipal Code does not have any provisions identifying or allowing emergency shelters within the city. The City has included program HI-1 to comply with State Law and is processing a zoning amendment concurrent with the Housing Element update.

While it is unlikely due to the limited services that an emergency shelter would be developed in the City of Trinidad, the commercial (C) zone has been identified as appropriate to accommodate an emergency shelter, should one be needed. The commercial zone would provide the most access to services and shopping. There City assumes the emergency shelter would be best suited as a reuse of a commercial building instead of a new development based on land constraints. While the City has several commercial properties, there are two that would most likely work best, APN 042-063-036 and APN 042-061-015. These sites include several suites and have had some turnover.

APN 042-063-036 is part of part of Saunder’s Shopping Center which includes the Lighthouse Grill (1,750 sq. ft.), Salty’s tackle shop (650 sq. ft.) and two office/commercial spaces (1,500 sq. ft. each) that have changed several times over the years. One space is currently a pizzeria and the other is vacant. APN 042-061-015 has a 3,000 sq. ft. commercial building with several suites, including a coffee shop/café, brick oven pizza, office space and an apartment.

Housing for Persons with Disabilities

In compliance with SB 520, a complete evaluation of the City’s zoning laws, practices, and policies was done as a part of the Housing Element update process.

- **Reasonable accommodations.** The City’s Zoning Ordinance does not have a reasonable accommodation procedure but has included implementation program HI-1.
- **Separation requirements.** Once allowed (program HI-1), the City’s Zoning Ordinance will not impose any separation requirements between residential care facilities.
- **Site planning requirements.** Once allowed (program HI-1), site planning requirements for residential care facilities will be no different than for other residential uses in the same zone.
- **Definition of family.** The City’s current definition is as follows “Family" means one person; or two or more persons; or a group not in excess of five persons living together as a single housekeeping unit”. The City’s has included program HI-1 to update the ensure the City’s definition of family is consistent with current housing law.

Accessory Dwelling Units

Assembly Bill (AB) 1866 requires local governments to use a ministerial process for considering second-unit applications for the purpose of facilitating the production of affordable housing. The City has included program HI-1 to comply with State Law.