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PUBLIC REVIEW DRAFT

CITY OF TRINIDAD

HOUSING ELEMENT 2019 – 2027

Prepared by

PLACEWORKS

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Introduction

Purpose

The purpose of the Housing Element is to identify housing solutions that solve local housing problems and to meet or exceed the Regional Housing Needs Allocation. The City recognizes that the provision of adequate housing is best met through various resources and interest groups. This element establishes the local goals, policies, and programs the City will implement and/or facilitate to address the identified housing issues.

State law requires the Housing Element to be consistent and compatible with other General Plan elements. The Housing Element should provide clear policy direction for making decisions pertaining to zoning, subdivision approval, housing allocations, and capital improvements. State law (Government Code Sections 65580 through 65589) mandates the content of the Housing Element and requires an analysis of:

- Population and employment trends;
- The City's fair share of the regional housing needs;
- Housing stock and household characteristics;
- An inventory of land suitable for residential development;
- Governmental and non-governmental constraints on the improvement, maintenance, and development of housing;
- Special housing needs;
- Opportunities for energy conservation; and
- Publicly assisted housing projects that may convert to market rate housing projects.

The purpose of these requirements is to develop an understanding of the existing and projected housing needs within the community and to set forth policies and schedules promoting the preservation, improvement, and development of diverse housing types available at a range of costs.

General Plan Consistency

The City of Trinidad General Plan provides goals relating to protection and utilization of resources, development consistent with service levels, and constraints to development. Any proposed land use must be compared with the entire General Plan to determine if the project is consistent with the basic land use designation and does not adversely affect an overlaying constraint. The Introduction to the General Plan lists the locations of all components of the General Plan. The General Plan establishes both opportunities for development and constraints against development.

The Housing Element update has been analyzed for consistency with the City's General Plan and does not propose any goals, policies, or programs that are considered contrary to General Plan goals, policies, and programs. No changes are proposed to the existing General Plan land use designations. The City will review and revise the Housing Element as necessary for consistency when amendments are made to the General Plan.

Regional Housing Needs Allocation

The Humboldt County Association of Governments (HCAOG) is a Joint Powers Authority (JPA). Membership includes Humboldt County and the cities of Arcata, Blue Lake, Eureka, Ferndale, Fortuna, Rio Dell and Trinidad. As directed in State Government Code Section 65584, the Department of Housing and Community Development (HCD) determines the existing and projected housing need for distinct regions in the state. In consultation with HCD, HCAOG is required to adopt a Regional Housing Needs Plan (RHNP) that allocates a share of the regional housing need to each city and county. The 8.7-year projection period begins December 31, 2018 and ends August 31, 2027.

Listed below is the breakdown of the RHNA for the City of Trinidad, by income group, for the 2018–2027 period.

Table 1: Future Housing Needs, 2018–2027

Income Category	2018–2024 RHNA
Very Low	4
Low	4
Moderate	3
Above Moderate	7
Total	**18**

Source: California Department of Housing and Community Development

Data Sources

In preparing the Housing Element, various sources of information were used. The City relied on the US Census, American Community Survey (ACS), California Department of Finance, and other local sources as available.

The US Census, which is completed every 10 years, is an important source of information for the community profile. It provides the most reliable and in-depth data for demographic characteristics of a locality. The ACS is conducted by the US Census Bureau and provides estimates of numerous housing-related indictors based on samples averaged over a five-year period. The Housing Needs Assessment reflects the data provided from HCD and the 2012–2016 ACS data. It should be noted that the ACS data can have a large margin of error for a community as small as Trinidad, so the data may not always be accurate.

The California Department of Finance is another source of valuable data and is more current than the census. However, the Department of Finance does not provide the depth of information that can be found in the US Census Bureau reports. Whenever possible, Department of Finance data and other local sources were used in the Housing Needs Assessment in order to provide the most current profile of the community.

Public Participation

The California Department of Housing and Community Development requires that local governments make a diligent effort to achieve the public participation of all economic segments of the community.

During the Housing Element update process, the City of Trinidad made diligent efforts to reach all segments of the community. Public input on housing needs and strategies is critical to developing appropriate and effective City housing programs. The City elicited public participation by posting notices in public locations around town and by contacting service providers (specifically representing lower-income households), local real estate agents, developers, housing needs advocacy groups, and other stakeholders.

All segments of the community were encouraged by the City to participate in the preparation of the Housing Element through a combination of general public notices and direct contacts with organizations serving low-income and special needs groups. The City also informed each group that the draft Housing Element has been submitted to HCD and to ask for input and feedback.

- Trinidad Chamber of Commerce
- Trinidad Lion's Club
- Trinidad Elementary School
- Forbes and Associates
- Humboldt Association of Realtors
- McKinleyville Family Resource Center
- Housing Humboldt
- Adult Day Health Care of Mad River

The draft Housing Element was available for review on the City's website and hard copies were available at City Hall and the Trinidad Library during the entire update process.

Planning Commission Hearings

On March 4, 2020 City staff presented the Housing Element update and Zoning Ordinance Amendments scope or work and schedule to the Planning Commission and requested feedback. No comments were received.

The City also held a Planning Commission hearing on March 18, 2020 where the draft was presented for review and comment.

Comments Received

No Public comments have been received to date.

City Council Hearings

To be completed once hearings occur.

Housing Goals, Objectives, and Programs

The City's goals, policies and objectives are intended to accomplish the broad State housing goals and requirements as appropriate for Trinidad's particular needs and circumstances. The format and organization of the goals and policies of the City's Housing Element are slightly different than the other chapters of the General Plan. Rather than there being a set of policies for each goal, all the goals and policies are grouped together because most of the policies are applicable to multiple goals.

Goal HG-1: Assure adequate, safe, cost-effective and energy efficient housing opportunities for all segments of the community, while maintaining the quality living environment and rural character of Trinidad by planning for and enabling the development of balanced residential neighborhoods with access to affordable housing, community facilities and public services.

Community Housing Policies

HP-1.1 Review all new residential development to be consistent with the existing small-town character of the community and to ensure sustainability as well as scenic and environmental protection. Review and revise Trinidad's View Protection Criteria as necessary to provide clearer guidance and reduce community conflicts while still protecting important public and private coastal views.

HP-1.2 Due to existing physical constraints, retain the existing emphasis on single-family dwelling units in residential designated areas. ADUs, which are a valuable source of affordable housing, shall be carefully regulated to ensure that coastal resources are protected and may not be appropriate on all residential lots. Encourage limited multi-family developments on large Planned Development lots, provided that the density does not exceed the physical limitations of the land.

HP-1.3 Continue to allow manufactured housing to be permitted on sites where single-family dwellings would otherwise be allowed.

HP-1.4 Promote conservation and improvement of the existing housing stock, with emphasis on older structures. Specific areas of concern include energy efficiency, electrical wiring, foundation stability, potential for water damage, and septic tank failure.

HP-1.5 Encourage the use of private-initiated and / or publicly-funded programs to provide housing for low- and moderate-income families, and pursue as feasible, appropriate, applicable local, State, and Federal housing and economic development programs. As pertinent information becomes available, develop a program for notifying residents of the availability of housing programs and funding.

HP-1.6 Preserve the City's more affordable housing stock along with historical and cultural heritage through preservation and innovative reuse of older structures

Goal HG-2: Provide for adequate housing for persons with special housing needs such as target income groups of low-income, the elderly, handicapped, and female-headed households.

Special Needs Housing Policies

HP-2.1 Discrimination in housing based on race, color, religion, sex, family size, marital status, national origin, ancestry, or other arbitrary factors is not permitted. Support appropriate safeguards to ensure fair housing opportunities.

HP-2.2 Encourage provisions for access for the handicapped in new or rehabilitated residential and commercial developments by considering exceptions or revisions to City ordinances allowing more flexibility relating to zoning, density, reduced setbacks or other incentives to provide reasonable accommodation or improve living conditions of residents as long as coastal resources are still adequately protected.

HP-2.3 Encourage the County to allow a variety of housing types in the residential areas surrounding the City. Consider entering into a multi-jurisdictional agreement to provide housing and / or shelter for homeless persons.

CD-9.8 Encourage new residential development in Trinidad to specifically address the needs of seniors, including projects that have smaller yards, low-maintenance landscaping, limited mobility fixtures, and appropriately sized parking spaces.

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).
- **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 (PF) 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. Amendments are dependent on the California Coastal Commission review process.

Funding Source: General Fund and or grants

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

HI-5 To encourage development of housing for extremely low income 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.

Responsibility: City Council

Time Frame: Reach out to RCAA by January 2022, if funding is available, complete survey by January 2022.

Funding Source: General Fund

HI-10 Develop a plan to Affirmatively Further Fair Housing (AFFH). The AFFH Plan shall take actions to address significant disparities in housing needs and in access to opportunity for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing

with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law.

Specific actions could include but are not limited to:

- Provide dedicated staff that investigates fair housing complaints and enforces fair housing laws.
- Facilitate public education and outreach by creating informational flyers on fair housing that will be made available at public counters, libraries, and on the City's website. City Council meetings will include a fair housing presentation at least once per year
- Actively recruit residents from neighborhoods of concentrated poverty to serve or participate on boards, committees, and other local government bodies.
- Develop a proactive code enforcement program that holds property owners accountable.
- Provide education to the community on the importance of completing Census questionnaires.

Responsibility: City Council, Planning Commission, and Planning Staff

Time Frame: Create Plan by January 2023 and implement on an ongoing basis

Funding Source: General Fund

HI-11 The City will continue to encourage appropriately licensed / permitted cottage or home-base industries, including those related to commercial fishing / tourism to the area, to a reasonable extent, in efforts to bolster the City's economy, promote affordable housing, and increase employment opportunities by implementing the following actions:

- Permit at least 1 licensed day care or nursery school operation where appropriate
- Increase tourism revenues by promoting community events
- Increase opportunities for development of cottage industries / home occupations that are compatible with neighborhood character and environmental constraints
- Permit appropriate and necessary ancillary services to the commercial fishing industry

Responsibility: City Council, City Clerk, and Planning Staff

Time Frame: As feasible, hold annual meetings between the City Council and Business Community.

Funding Source: General Fund

HI-12 Work with the Redwood Coast Regional Center 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 the City's website.

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 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. 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 Element 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

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					
	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
New Construction (1)	2	2	4	3	7	**18**
Rehabilitation (2)						
Preservation (3)						
Total	2	2	4	3	7	**18**

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.

Evaluation of the Previous Housing Element

The following table provides the implementation progress of the City's housing programs. As a part of this review and evaluation, the housing programs from the previous Housing Element have been completely reworked to be more straightforward and streamlined.

Program			Implementation status	Continue/Modify/Delete
HI-1	Continue to pursue certification of an Accessory Dwelling Unit (ADU) Ordinance to allow second units where feasible, subject to certain restrictions allowed by State Law. The ADU Ordinance has been approved by the City Council and was forwarded to the California Coastal Commission (CCC) in May 2013 for review and ultimate inclusion into the City's Local Coastal Program (LCP).	Responsibility: City Council, Planning Commission, & Planning Staff Time Frame: Within the next year. Dependent on CCC review process.	The City's ADU Ordinance has not been approved by the Coastal Commission. The Coastal Commission is requesting additional data including wastewater, geology, water, and parking.	Modify
HI-2	Continue to maintain zoning regulations that allow for manufactured housing on remaining developable residential lots within the City.	Responsibility: City Council, Planning Commission Time Frame: Ongoing.	Manufactured housing is treated as a single-family use.	Combine with HI-1.
HI-3	As relevant information becomes available, publicize available programs or resources regarding the following topics through a local community newsletter or water billing: a. Subsidized Housing Programs b. Shared Housing Opportunities c. Available day care/nursery school programs d. Permit process to become a licensed day care provider	Responsibility: City Council & City Clerk Time Frame: Ongoing	The City plans to publicize available programs and resources on the City's website or in the water bill.	Continue

Program			Implementation status	Continue/Modify/Delete
	e. Available adult day care program f. Fair Housing Practices g. Nearby Social Services h. Housing Rehabilitation Programs, Weatherization Programs i. Local Employment Opportunities			
HI-4	If a need or interest is identified, research and implement opportunities for group quarters for targeted groups (single persons, female-headed households, disabled, seniors, etc.). If applicable and available, assist interested applicants to apply for HCD's Family Housing Demonstration Program (FHDP).	Responsibility: City Council, City Clerk, & Planning Staff Time Frame: If an applicable program is identified and program funds are available, assist at least one interested applicant to submit an application during the next five year period.	Due to the lack of resources, the City has not implemented this program.	Modify. Combine with HI-5.
HI-5	Pursue Senior Group Housing opportunities. If the City is eligible, consider submitting am application / proposal to HCD for the CalHome Program.	Responsibility: City Council, City Clerk, & Planning Staff Time Frame: If an applicable program is identified and program funds are available, assist at least one interested applicant to submit an application during the next five year period.	Due to lack of resources, the City did not apply for the CalHome Program.	Modify. Combine with HI-4.
HI-6	Continue implementing the requirements of the American Disabilities Act (ADA) by ensuring the use of the most recent Uniform Building Code. Support requests for reasonable accommodation as long as long as long as it is not detrimental to the public welfare or environment.	Responsibility: City Council & City Building Inspector Time Frame: Ongoing	The City has not yet adopted a reasonable accommodation ordinance.	Combine with HI-1.

Program			Implementation status	Continue/Modify/Delete
HI-7	Provide assistance to individuals requesting the development of limited care facilities for seniors and / or the disabled.	Responsibility: City Council, City Clerk, & Planning Staff working with Service Providers Time Frame: If an applicable program is identified and program funds are available, the, assist at least one interested applicant to submit an application during the next five year period.	The City has not received any requests to develop senior housing.	Delete.
HI-8	Encourage rehabilitated units to include retrofit weatherization improvements such as ceiling and floor insulation, caulking, and weather-stripping.	Responsibility: City Council, City Clerk, & City Building Inspector Time Frame: Ongoing	As part of the building permit process the City encourages retrofit weatherization improvements such as ceiling and floor insulation, caulking, and weather-stripping, etc.	Modify. Combine with HI-9.
HI-9	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 & City Clerk Time Frame: Ongoing	The City continues to disseminate energy conservation information for existing housing by publicizing and / or providing information regarding energy audit and weatherization programs.	Modify. Combine with HI-8.
HI-10	New Construction and major remodels will continue to be required to comply with the current version of Title 24 of the California Building Standards Code. These requirements are approved by the City Building Department at the time of plan review or permit application.	Responsibility: City Building Inspector Time Frame: Ongoing	The City continues to comply with Title 24.	Continue.
HI-11	Consider requesting a local organization involved in housing rehabilitation (e.g.	Responsibility: City Council	The City participates in local meetings and programs and provides	Continue.

Program			Implementation status	Continue/Modify/Delete
	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. City Staff or Community Members could complete this task as well.	Time Frame: Within two years after adoption of the Housing Element.	reports to the City Council. Brochures are also available at city hall.	
HI-12	If eligible, apply for, or support appropriate applications to HCD and other applicable agencies for funds to provide grants and / or low interest and deferred loan programs for the rehabilitation of housing occupied by targeted income households.	Responsibility: City Council, City Clerk, & Planning Staff Time Frame: If an applicable program is identified and program funds are available, assist as many interested applicants as feasible to submit an application during the next five year period.	Due to lack of resources, the City has not applied for grant funds to assist with housing rehabilitation.	Modify. Combine with HI-4.
HI-13	The City will continue participation in the Humboldt County Fair Housing Committee sponsored by the Board of Realtors.	Responsibility: City Council Time Frame: Ongoing	Due to lack or resources the City has not participated in the Humboldt County Fair Housing Committee.	Modify. New AFFH language.
HI-14	The City Clerk is designated as the contact for referral of fair housing complaints to the State Department of Fair Housing and Employment.	Responsibility: City Council & City Clerk Time Frame: Ongoing. Post a minimum of two notices informing residents regarding fair housing complaints each year at Town Hall and / or other appropriate public places.	The City continues to refer fair housing complaints as they are received.	Modify. Combine with HI-13
HI-15	The City will continue to encourage appropriately licensed / permitted cottage or home-base industries, including those related to commercial fishing / tourism to the area, to a reasonable extent, in efforts	Responsibility: City Council, City Clerk, & Planning Staff Time Frame: As feasible, hold annual meetings between the City Council and Business Community.	The City permitted one daycare facility and continues to promote several community events including the Fish Festival, Art Nights/Markets, etc.	Continue.

Program		Implementation status	Continue/Modify/Delete
to bolster the City's economy, promote affordable housing, and increase employment opportunities by implementing the following actions: 1. Permit at least 1 licensed day care or nursery school operation where appropriate 2. Increase tourism revenues by promoting community events 3. Increase opportunities for development of cottage industries / home occupations that are compatible with neighborhood character and environmental constraints 4. Permit appropriate and necessary ancillary services to the commercial fishing industry		The City also continues to permit appropriate and necessary ancillary services to the commercial fishing industry.	

Community Profile

Population Characteristics

Housing needs are largely determined by population and employment growth, coupled with various demographic variables. Characteristics such as age, household size, occupation, and income combine to influence the type of housing needed and its affordability.

Population Growth

Between 2010 and 2018, Humboldt County's population grew slightly by 1,379 people, or +1.0 percent. In contrast, Trinidad's population declined by 27 people, or -7.4 percent between 2010 and 2018 (Table 3).

Table 3: Population Growth 2010-2018

City/County	Total Population		2010–2018 Change	
	2010	2018	Number	Percentage
Trinidad	367	340	-27	-7.4%
Humboldt County	134,623	136,002	1,379	1.0%

Source: California Department of Finance, E-4 Population Estimates for Cities, Counties, and the State.
Note: Population counts vary slightly based on the source of data and type of survey.

Age Characteristics

Current and future housing needs are usually determined in part by the age characteristics of a community's residents. Each age group has distinct lifestyles, family type and size, incomes, and housing preferences. Consequently, evaluating the age characteristics of a community is important in determining its housing needs.

The median age of residents in Trinidad is approximately 61 years old. The median age has been increasing slowly, from 50.2 in 2000, 45.9 in 2010 to 60.7 in 2016. The city's population is getting older, with 66.9 percent of residents over 45 years of age, and 21.4 percent of residents in the family-forming age group (25–44). Table 4 shows the age distribution of the population of Trinidad.

Table 4: Population by Age (2016)

Age Group	Number	Percentage
0-9 years	10	4.8%
10-19 years	6	2.9%
20-24 years	8	3.8%
25-34 years	24	11.4%
35-44 years	21	10.0%
45-54 years	8	3.8%
55-59 years	26	12.4%
60-64 years	31	14.8%
65-74 years	49	23.4%

Age Group	Number	Percentage
75-84 years	25	12.0%
85+ years	1	0.5%
Median Age	60.8	100.0%

Source: 2012-2016 ACS 5-Year Estimates, Table S0101.

Employment Trends

According to the 2012-2016 American Community Survey, 114 people 16 years and over were employed in the City. Educational services, and health care and social assistancemake up the majority of the job market at 51 people, or 44.7 percent. Table 5 shows employment by industry in Trinidad.

Table 5: Employment by Industry (2016)

Industry	Number	Percentage
Civilian employed population 16 years and over	114	114
Agriculture, forestry, fishing and hunting, and mining	6	5.3%
Construction	1	0.9%
Manufacturing	0	0.0%
Wholesale trade	0	0.0%
Retail trade	5	4.4%
Transportation and warehousing, and utilities	1	0.9%
Information	0	0.0%
Finance and insurance, and real estate and rental and leasing	2	1.8%
Professional, scientific, and management, and administrative and waste management services	13	11.4%
Educational services, and health care and social assistance	51	44.7%
Arts, entertainment, and recreation, and accommodation and food services	14	12.3%
Other services, except public administration	6	5.3%
Public administration	15	13.2%

Source: 2012-2016 ACS 5-Year Estimates, Table DP03.

Household Characteristics

Households Type and Size

A household refers to the people occupying a home, such as a family, a single person, or unrelated persons living together. Family households often prefer single-family homes or condominiums to accommodate children, while nonfamily households generally occupy smaller apartments or condominiums.

In Trinidad, families comprised 44.3 percent of all households, and 7.0 percent of all households were family households with children under 18 years of age. Table 6 displays household composition as reported by the 2012-2016 American Community Survey.

Table 6: Household Characteristics (2016)

Jurisdiction	Households	Average Household Size	Percentage of Households	
			Families	Families with Children Under 18
City of Trinidad	115	1.96	51 (44.3%)	8 (7.0%)

Source: 2012-2016 ACS 5-Year Estimates, Department of Finance, 2019.

Overcrowding

Overcrowding occurs when there is more than one person per room (excluding bathrooms and kitchens) and severely overcrowding occurs when there are more than 1.51 persons per room. Overcrowding is often a result of an inadequate supply of affordable and decent housing. According to the 2012-2016 American Community Survey, three households were living in overcrowded conditions (2.6 percent of all households) and no households were severely overcrowded. Refer to Table 7.

Table 7: Overcrowded Households (2016)

Persons per Room	Number	Percentage of Total Units
Owner-Occupied	76	66.1%
1.00 or less	73	63.5%
1.01 to 1.50	3	2.6%
1.51 or more	0	0.0%
Renter-Occupied	39	33.9%
1.00 or less	39	33.9%
1.01 to 1.50	0	0.0%
1.51 or more	0	0.0%
Total Occupied Housing Units	115	100.0%
Total Owner Overcrowded	3	2.6%
Total Renter Overcrowded	0	0.0%
Total Overcrowded	3	2.6%
Total Owner Severely Overcrowded	0	0.0%
Total Renter Severely Overcrowded	0	0.0%
Total Severely Overcrowded	0	0.0%

Source: 2012-2016 ACS 5-Year Estimates, Table B25014.

Household Income

The California Department of Housing and Community Development annually publishes income limits per county for use in determining eligibility for assisted housing programs in that county. The 2019 income limits are listed in Table 8 for each income category according to household size. These income limits are based on a median income of $64,800 (for a family of four) in Humboldt County:

- Extremely Low Income — Up to 30 percent of area median income (AMI) ($0–$25,750)
- Very Low Income — 31–50 percent of AMI ($25,751–$32,400)
- Low Income — 51–80 percent of AMI ($32,401–$51,850)
- Moderate Income — 81–120 percent of AMI ($51,851–$77,750)
- Above Moderate Income — Above 120 percent of AMI ($77,750 or more)

Table 8: Maximum Household Income by Household Size (2019), Humboldt County

Income Category	Persons per Household							
	1	2	3	4	5	6	7	8
Extremely Low	13650	16910	21330	25750	30170	34590	39010	42800
Very Low	22700	25950	29200	32400	35000	37600	40200	42800
Low	36300	41500	46700	51850	56000	60150	64300	68450
Moderate	54450	62200	70000	77750	83950	90200	96400	102650

Source: California Department of Housing and Community Development Memorandum, "State Income Limits for 2019," May 6, 2019.

Lower Income Households and Overpayment

Overpayment is narrowly defined as the number of lower-income households that spend more than 30 percent of their income for housing (either mortgage or rent), including cost of utilities, property insurance, and real estate taxes, as defined by the federal government. Table 10 shows the extent of overpayment. Approximately 43.0 percent of households in Trinidad were overpaying for housing—22.2 percent were renter-occupied households and 20.7 percent were owner-occupied households.

When looking at lower-income households overpaying (households earning less than $51,850 for a household of four), approximately 10 were owner-occupied households and approximately 16 were renter-occupied households.

Table 10: Housing Cost as a Percentage of Household Income by Tenure (2015)

Total Households Characteristics	Number	Percent of Total Households
Total occupied units (households)	135	1
Total renter households	55	40.7%
Total owner households	80	59.3%
Total lower income (0-80% of HAMFI) households	42	31.1%
Lower income renters (0-80%)	18	13.3%
Lower income owners (0-80%)	24	17.8%
Extremely low-income renters (0-30%)	4	3.0%
Extremely low-income owners (0-30%)	0	0.0%
Lower income households paying more than 50%	8	5.9%
Lower income renter HH severely overpaying	8	5.9%
Lower income owner HH severely overpaying	0	0.0%
Extremely Low-Income (0-30%)	4	3.0%
ELI Renter HH severely overpaying	4	3.0%

Total Households Characteristics	Number	Percent of Total Households
ELI Owner HH severely overpaying	0	0.0%
Income between 30%-50%	4	3.0%
Income between 50% -80%	0	0.0%
Lower income households paying more than 30%	26	19.3%
Lower income renter HH overpaying	16	11.9%
Lower income owner HH overpaying	10	7.4%
Extremely Low-Income (0-30%)	4	3.0%
Income between 30%-50%	18	13.3%
Income between 50% -80%	4	3.0%
Total Households Overpaying	**58**	**43.0%**
Total Renter Households Overpaying	**30**	**22.2%**
Total Owner Households Overpaying	**28**	**20.7%**
Total households paying between 30%-50% Income	**42**	**31.1%**
Total households paying > 50% Income	**16**	**11.9%**

Source: 2006-2015 CHAS Data Sets, https://www.huduser.gov/portal/datasets/cp.html#2011-2015_data.

Housing Stock Characteristics

Vacancy and Housing Availability

Vacancy trends in housing are analyzed using the vacancy rate as an indicator of housing supply and demand. If housing demand is greater than the supply, the vacancy rate is likely to be low, and the price of housing increases. A vacancy rate of 5 percent is generally considered optimal because it is high enough to provide some flexibility in the housing market without significant increases in housing prices.

As shown in **Table 11**, the vacancy rate in Trinidad is very high, estimated to be 43.6 percent as of 2019, or which 29.4 percent are categorized as seasonal/ recreational or occasional use.

Table 11: Residential Vacancy Rate 2016

Type	Number	Percentage
Occupied	115	56.4%
Vacant	89	43.6%
For rent	8	3.9%
For sale	5	2.5%
Rented/sold, not occupied	0	0.0%
For seasonal/recreational or occasional use	60	29.4%
All other including migrant workers	16	7.9%
Total Housing Units	**204**	**100.0%**

Source: Department of Finance, E-5 Report, 2016

Housing Tenure

As shown in Table 12, Trinidad has a higher percentage of householders who own their home (66.1percent of occupied units) than of householders who rent their home from a property owner (33.9 percent of occupied units).

Table 12: Household Tenure (2016)

	Number	Percentage
Owner-Occupied Units	76	66.1%
Renter-Occupied Units	39	33.9%
Total	115	100.0%

Source: 2012-2016 ACS 5-Year Estimates, Table B25009.

Unit Type

As shown in Table 13, the majority (83 percent) of occupied housing units in Trinidad are single-family, detached homes, followed by mobile homes units which make up 11.2 percent.

Table 13: Housing Units by Type (2019)

Housing Unit Type	Number	Percentage
Single-Family, Detached	186	83.0%
Single-Family, Attached	2	0.9%
Multifamily, 2–4 Units	11	4.9%
Multifamily, 5+ Units	0	0.0%
Mobile Homes or Other Type	25	11.2%
Total	224	100.0%

Source: California Department of Finance, E-5, 2019, City of Trinidad, March 2020.

Housing Age and Conditions

Housing conditions are an important indicator of quality of life in Trinidad. Like any asset, housing ages and deteriorates over time. If not regularly maintained, structures can deteriorate and discourage reinvestment, depress neighborhood property values, and even become health hazards. Thus, maintaining and improving housing quality is an important goal for communities.

An indication of the quality of the housing stock is its general age. Typically housing over 30 years old is likely to have rehabilitation needs that may include plumbing, roof repairs, foundation work, and other repairs. Table 14 displays the age of the City of Trinidad's housing stock as of 2019, of which 51.9 percent were built since 1990. This means 48.1 percent of the housing stock is over 30 years old, and the rehabilitation needs are likely great in Trinidad. The building department confirms a significantly lower percentage, estimating that less than 10 percent of homes within the City are in need of some sort of rehabilitation.

Table 14: Age of Housing Stock (2016)

Year Built	Number	Percentage
2014 or later	18	8.8%
2010–2013	18	8.8%
2000–2009	46	22.5%
1990–1999	24	11.8%
1980–1989	38	18.6%
1970–1979	30	14.7%
1960–1969	19	9.3%
1950–1959	11	5.4%
1940–1949	0	0.0%
1939 or earlier	0	0.0%
Total	204	100.0%

Source: 2012-2016 ACS 5-Year Estimates, Table B25034

Housing Costs and Affordability

Rental Housing Costs

Based on market trends, in Trinidad for all rentals the median rent per month was $1,425, and the average rent per month was $1,828.[1]

Sales Prices

According to Trulia, the median sales price for homes in Trinidad between June and December 2019 was $572,000 based on 18 home sales.

According to the US Census and the ACS, the median value of housing in Trinidad has approximately doubled every decade since 1980. The most recent data is tempered somewhat by the recent housing market crash.

Data Source	Median Sales Price
1980 Census	$73,500
1990 Census	$150,000
2000 Census	$321,000
2019 Trulia Sold Homes	$572,000

[1] These prices are based on a point-in-time analysis of rental listings found on Craigslist within a 10-mile radius of ZIP code 95570 on 3/11/2020.

Housing Affordability

Housing affordability is dependent upon income and housing costs. According to the California Department of Housing and Community Development (HCD) income guidelines for 2019, the AMI in Humboldt County is $64,800 for a family of four. Assuming that the potential homebuyer in each income group has sufficient credit and down payment (10 percent) and maintains affordable housing expenses (i.e., spends no more than 30 percent of their income on the mortgage, taxes, and insurance), the maximum affordable home prices can be determined. Table 15 demonstrates the purchasing power of the income groups defined above.

When looking at rental and sales prices and comparing those to what households can afford, the City has rental housing affordable to moderate-income households and for sale prices affordable to above moderate-income households.

Table 15: Affordable Housing Costs by Income Category (2019)

(Based on a Four-person Household in Humboldt County)	Income Level		
	Very Low	Low	Moderate
Annual Income	$32,400	$51,850	$77,750
Monthly Income	$2,700	$4,321	$6,479
Maximum Monthly Gross Rent[1]	$810	$1,296	$1,944
Maximum Purchase Price[2]	$70,400	$138,100	$185,600

Sources: HCD State Income Limits, 2019; https://www.chase.com/personal/mortgage/calculators-resources/affordability-calculator; https://www.realtor.com/mortgage/tools/affordability-calculator/#summary, accessed 3/11/2020.

[1] *Affordable housing cost for renter-occupied households assumes 30% of gross household income, not including utility cost.*

[2] *Affordable housing sales prices are based on the following assumed variables: approximately 10% down payment, 30-year fixed rate mortgage at 3.66% annual interest rate, taxes, insurance and private mortgage insurance (since borrowers will likely put less than 20% down).*

Assisted Units at Risk of Conversion

State law requires that the housing element include an analysis of the existing assisted housing developments that are eligible to change from low- to moderate-income housing uses during the next 10 years due to termination of subsidy contracts, mortgage prepayment, or expiration of restrictions on use. There are no subsidized projects in the City of Trinidad at this time.

Special Needs Groups

This section assesses the special needs households in Trinidad. Special needs households can be constrained by lower incomes and a lack of housing that is suitable to their special needs.

Senior Households

The limited incomes of many elderly people make it difficult for them to find affordable housing. Many elderly people have physical disabilities and dependence needs that limit their selection of housing. As of 2016, it was estimated that were 51 senior citizens living in Trinidad. Table 16 shows the senior population as of 2016.

Table 16: Senior Householder (2016)

Age Group	2016
Ages 65–74	37
Ages 75–84	13
Ages 85+	1
Total	**51**

Sources: 2012-2016 ACS 5-Year Estimates, Table DP05.

Persons with Disabilities

As defined by the California Government Code, disabilities include physical and mental disabilities. A "mental disability" involves any mental or psychological disorder or condition, such as mental retardation, organic brain syndrome, emotional or mental illness, or specific learning disabilities that limit a major life activity. A "physical disability" includes any physiological disease, disorder, condition, cosmetic disfigurement, or anatomical loss of body functions. Physical disabilities include those that are neurological, immunological, or musculoskeletal in nature as well as those that involve the respiratory, cardiovascular, reproductive, genitourinary, hemic and lymphatic, or digestive systems and those involving the special sense organs, speech organs, skin, or endocrine system.

Table 17 show the number of persons with disabilities in Trinidad. Approximately 11.1 percent of the total population (5 years old or older) has some type of disability, and half of those are below the age of 65.

Table 17: Persons with Disability (2016)

	Number	Percentage
Persons Age 5–64 with a Disability	18	5.5%
Persons Age 65 + with a Disability	18	5.5%
Total Persons with a Disability (Age 5+)	**36**	11.1%
Total Population	**325**	100.0%

Source: 2012–2016 ACS 5-Year Estimates, Table S1810.

Table 18 shows the total number of persons in Trinidad by disability type for the 5 to 64 and 65 and over age groups. Many of these persons have more than one disability, which is why more disabilities are listed than there are disabled persons. Ambulatory living difficulties and Independent Living Difficulty are the most common forms of disability among residents ages 5 to 64 in Trinidad. Seniors age 65 and above in Trinidad are more likely to have to either ambulatory difficulties or hearing difficulties.

Table 18: Persons with Disability by Disability Type (2016)

	Number	Percentage
Total Disabilities Tallied	36	100.0%
Total Disabilities Tallied for People 5 to 64 years	18	50.0%
Hearing difficulty	3	8.3%
Vision difficulty	0	0.0%
Cognitive difficulty	7	19.4%

	Number	Percentage
Ambulatory difficulty	17	47.2%
Self-care difficulty	2	5.6%
Independent living difficulty	16	44.4%
Total Disabilities Tallied for People 65 Years and Over	18	50.0%
Hearing difficulty	11	30.6%
Vision difficulty	1	2.8%
Cognitive difficulty	3	8.3%
Ambulatory difficulty	12	33.3%
Self-care difficulty	3	8.3%
Independent living difficulty	7	19.4%

Source: 2012–2016 ACS 5-Year Estimates, Table S1810.

Development Disabilities (Senate Bill 812)

Senate Bill (SB) 812 requires the City to include in the special housing needs analysis, needs of individuals with a developmental disability in the community. A developmental disability is a disability that occurs before an individual reaches 18 years of age, is expected to continue indefinitely, and constitutes a substantial handicap. Developmental disabilities include mental retardation, cerebral palsy, epilepsy, autism, and disabling conditions closely related to mental retardation or requiring similar treatment. Housing Element Program HI-12 specifically addresses the needs of the developmentally disabled.

Table 19 includes information about Trinidad's population of developmentally disabled persons by age and zip code.

Table 19: Persons with Developmental Disabilities (2018)

Zip Code	0–17 years	18+ years
95570	**<11**	**<11**

Source: California Department of Developmental Services 2018.

Redwood Coast Regional Center

Redwood Coast Regional Center (RCRC) serves individuals and their family who have a developmental disability, or who are at risk for developing a disability, and individuals who are at risk of having a child with a disability in Del Norte, Humboldt, Lake, or Mendocino County. RCRC also serves families whose Infants and toddlers (birth to 36 months) who are at "high risk" for a developmental disability.

In order to fulfill the diverse needs of persons from infancy to end of life, some of the services and supports provided by RCRC include:

- Information and Referral
- Assessment and Diagnosis
- Prenatal Diagnostic Services
- Early Intervention Supports and Services

- Lifelong Individualized Planning and Service Coordination
- Behavioral Supports
- Employment and Day Services
- Health and Medical Services
- Family Support
- Residential Care
- Transportation

Large Families

Large families are defined as households containing five or more persons. They are considered a special needs group because there is a limited supply of adequately sized housing to accommodate their needs. A five-person household requires a three- or four-bedroom home; a six-person household requires four bedrooms; and a seven-person household requires four to six bedrooms.

According to the 2012–2016 American Community Survey, there were no households in in Trinidad that included five or more persons.

As of 2016, there was no shortage of housing for large families in Trinidad due to the availability of housing by bedroom size. There are 32 two to four-bedroom housing units, , and seven units with five or more bedrooms, respectively comprising 15.7percent, and 3.4 percent of all housing units in the city. Since the population of Trinidad grows gradually and the average household size is 1.96 persons per household, it can be presumed that the current supply of housing is sufficient to accommodate large families.

Female-Headed Households

Female-headed households are households headed by a single female parent with children under the age of 18 living at home. Single-parent households generally have lower incomes than two-parent households and often require special attention due to their need for affordable child care, health care, and housing assistance. Additionally, female-headed households tend to have lower incomes, limiting the availability of housing.

As of the 2012–2016 American Community Survey, approximately 1.96 percent of households in Trinidad were female-headed households with children, and no households were female-headed households under the poverty level.

Farmworkers

Agricultural workers earn their primary income through permanent or seasonal agricultural labor. As of the 2012–2016 American Community Survey, 6 persons, or approximately 5.3 percent of Trinidad's population were employed in agriculture, forestry, fishing and hunting.

Most farmworkers earn relatively low wages, and thus they fall into the extremely low– and very-low-income categories. According to the occupational profile for Humboldt County (accessed March 11, 2020, at www.labormarketinfo.edd.ca.gov), the current weekly mean income is $674. This income falls within the low-income category or below, since many farmworkers are unlikely to work every week of the year. According to the USDA Census of Farmworkers (2017), 859 farm workers, or 56 percent of all farm workers in Humboldt County worked fewer than 150 days per year.

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 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.

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 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

Adequate Sites Inventory and Analysis

This section addresses the requirements of Government Code Sections 65583 and 65583.2 for a parcel-specific inventory of appropriately zoned, available, and suitable sites that can provide realistic opportunities for the provision of housing to all income segments within the community.

Available Sites

As shown in Table 18 - Inventory of Land Available for Residential Development below, as of March 2020 there remained approximately 43 vacant, residentially zoned lots (UR, SR or PD) within City boundaries. However, sites with less than 4,000 sq. ft. of developable area, are likely too small or constrained to accommodate an onsite wastewater treatment system (OWTS) and a residence. Vacant parcels are shown in **Figure 1**. The sites on the map are categorized into three categories, developable, questionably developable, and not likely to develop. Site capacity has been adjusted based on these site constraints.

Yellow sites are as follows:

- 042-071-002
- 042-091-010
- 042-151-012
- 515-331-050
- 515-331-028

Red Sites are as follows:

- 042-081-006
- 042-091-002
- 042-061-024
- 042-063-033
- 042-063-034

All of the sites included are subject to Trinidad's program of pre-development review (including sewage disposal capacity and design review). The four Planned Development (PD) parcels are large enough to allow clustering of multi-family units and improvements.

Trinidad's inherent land-use constraints severely limit the development potential of all vacant land. The developable lots listed in **Table 18** are considered to be the build out for the City. These lots are zoned for single-family dwellings and carry a minimum lot size of 8,000 to 20,000 square feet and are dependent on lot constraints.

Aside from the existence of three large, currently undeveloped Planned Development (PD) parcels, no non-residential property in the City is available for conversion to residential use. The City has no industrial or agricultural zones. Most surrounding undeveloped property is within State Park boundaries or is Open Space and unsuitable for development due to geological instability or the existence of sensitive habitat and / or cultural resources.

Largely as a result of septic-system capability, slope stability constraints and the subdivision of most of the City into urban sized lots prior to zoning and other land use regulations, few previously developed parcels are available for subdivision for the purpose of creating more developable parcels. There are eight SR zoned lots and nine UR zoned that could potentially be subdivided (at least double the minimum lot size / maximum density). However, for most of these lots, subdivision is unlikely due to the configuration of the existing development and other constrains. New housing development is generally restricted to the sites identified in **Table 18**.

Table 18 – Inventory of Vacant Land Available for Residential Development

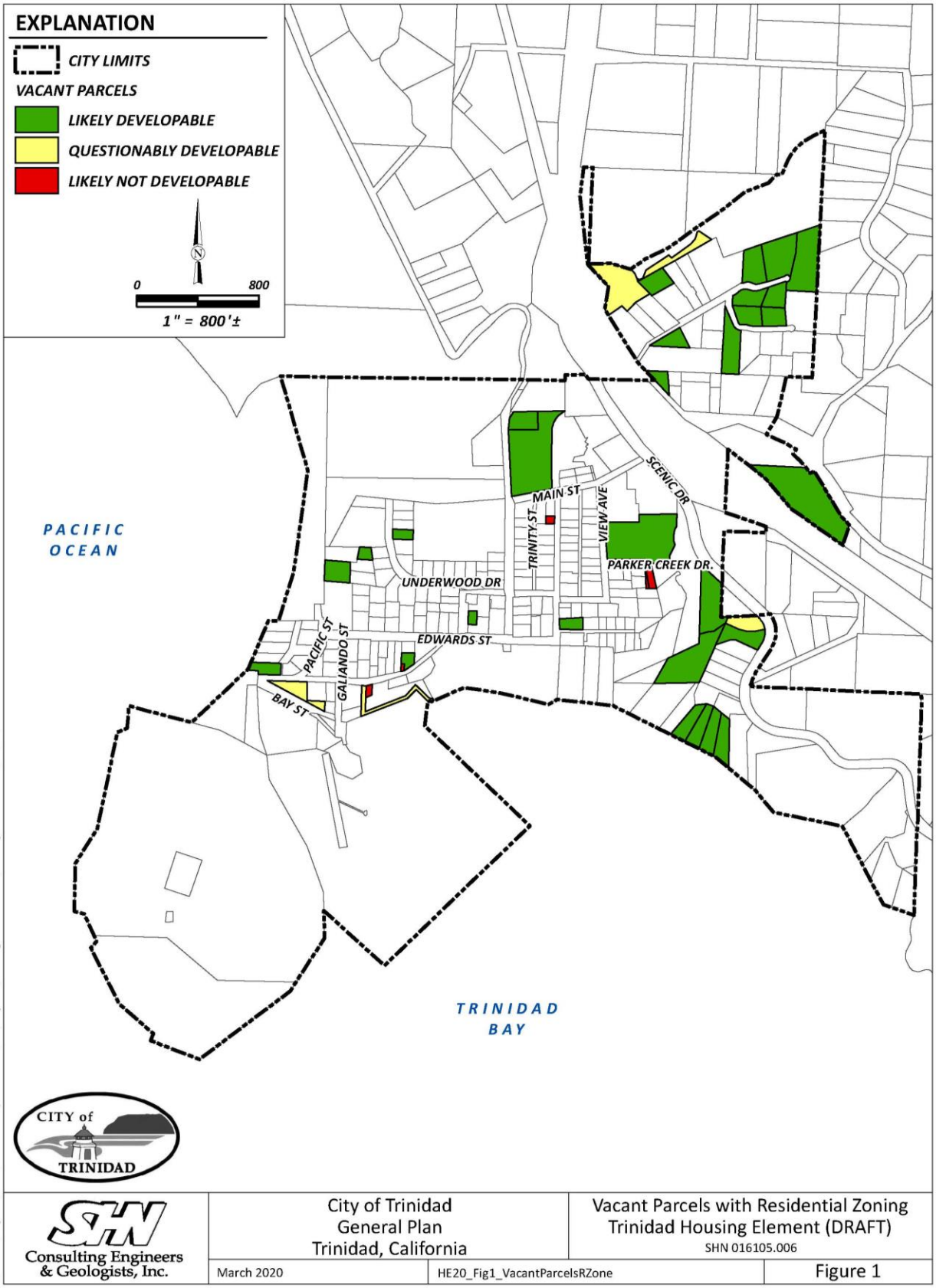
APN	Acreage	GP Des.	Zoning	Max. Allowable Density	Unit Potential	Site Constraints	RHNA Category Met
042-051-032	2.92	PD	PD	Multi-family 1 unit/ 8,000 sf	10	Soil limitations (wetland and fill); Alquist-priolo fault zone	Lower
042-051-037	0.49	PD	PD	Multi-family 1 unit/ 8,000 sf	2	Alquist-priolo fault zone	Lower
042-063-037	2.84	PD	PD	Multi-family 1 unit/ 8,000 sf	10	Creek setback, easements	Lower
515-151-066	3.11	PD/SE	PD/SE	Single-multifamily 1 unit/8,000 sf	12	Creek setback	Lower
PD Total	9.37				34		
042-031-023	0.19	UR	UR	Single-family 1 unit/8,000 sf	1		Moderate
042-041-029	0.17	UR	UR	Single-family 1 unit/8,000 sf	1	No road access, sloped	Moderate
042-041-056	0.52	UR	UR	Single-family 1 unit/8,000 sf	1	On a bluff edge; likely not subdividable	Moderate
042-042-006	0.11	UR	UR	Single-family 1 unit/8,000 sf	1	small	Moderate
042-061-024	0.07	UR	UR	Multi-family 1 unit/ 8,000 sf	0	Likely too small	Moderate
042-063-027	0.38	UR	UR	Single-family 1 unit/ 8,000sf	1	Creek setback	Moderate
042-063-033	0.04	UR	UR	Single-family 1 unit/ 8,000sf	0	Too small	Moderate
042-071-002	0.50	OS/UR/C	OS/UR/C	Single-family 1 unit/ 8,000sf	0	Zoning, on a steep hillside	Moderate

APN	Acreage	GP Des.	Zoning	Max. Allowable Density	Unit Potential	Site Constraints	RHNA Category Met
042-081-006	0.02	UR	UR	Single-family 1 unit/8,000 sf	0	Too small	Moderate
042-081-024	0.17	UR	UR	Single-family 1 unit/ 8,000sf	0	Too small	Moderate
042-082-019	0.33	UR	UR	Single-family 1 unit/8,000 sf	1	On bluff edge	Moderate
042-091-002	0.07	UR	UR	Single-family 1 unit/8,000 sf	0	Too small	Moderate
042-091-010	0.38	OS/UR	OS/UR	Single-family 1 unit/8,000 sf	1	OS Zoning, shape, on a bluff	Moderate
042-101-006	0.01	UR	UR	Single-family 1 unit/8,000 sf	0	Too small	Moderate
042-101-006	0.00	UR	UR	Single-family 1 unit/8,000 sf	0	Too small	Moderate
042-102-043	0.26	UR	UR	Single-family 1 unit/8,000 sf	1		Moderate
UR Total	3.23				8		
042-111-008	1.74	SE/SR	SE/SR	Single-family 1 unit/ 20,000 sf	1	SE Zoning, steep slopes, creek setback	Above Moderate
042-111-009	1.24	SE/SR	SE/SR	Single-family 1 unit/ 20,000 sf	1	SE Zoning, steep slopes, creek setback	Above Moderate
042-141-019	0.07	SR	SR	Single-family 1 unit/ 20,000 sf	0	Too small	Above Moderate
042-141-020	2.00	SR	SR	Single-family 1 unit/ 20,000 sf	4		Above Moderate
042-151-001	0.57	SR	SR	Single-family 1 unit/ 20,000 sf	1	Steep slope/bluff, potentially unstable	Above Moderate

APN	Acreage	GP Des.	Zoning	Max. Allowable Density	Unit Potential	Site Constraints	RHNA Category Met
042-151-003	0.55	SR	SR	Single-family 1 unit/ 20,000 sf	1	Steep slope/bluff, potentially unstable	Above Moderate
042-151-004	0.51	SR	SR	Single-family 1 unit/ 20,000 sf	1	Steep slope/bluff, potentially unstable	Above Moderate
042-151-005	0.49	SR	SR	Single-family 1 unit/ 20,000 sf	1	Steep slope/bluff, potentially unstable	Above Moderate
042-151-011	0.65	SE/SR	SE/SR	Single-family 1 unit/ 20,000 sf	1	Zoning, slopes, creek setback	Above Moderate
042-151-012	0.46	SE/SR	SE/SR	Single-family 1 unit/ 20,000 sf	1	Zoning, slopes, creek setback	Above Moderate
515-331-028	0.52	SE	SE	Single-family 1 unit per parcel	1	Zoning, creek setback, slopes	Above Moderate
515-331-049	0.68	SR	SR	Single-family 1 unit/ 20,000 sf	1		Above Moderate
515-331-050	1.58	SE	SE	Single-family 1 unit per parcel	1	Zoning, creek setback, slopes	Above Moderate
515-331-055	0.26	SR	SR	Single-family 1 unit/ 20,000 sf	1		Above Moderate
515-350-002	0.71	SR	SR	Single-family 1 unit/ 20,000 sf	1		Above Moderate
515-350-007	0.49	SR	SR	Single-family 1 unit/ 20,000 sf	1		Above Moderate
515-350-008	0.44	SR	SR	Single-family 1 unit/ 20,000 sf	1		Above Moderate
515-350-011	0.47	SR	SR	Single-family 1 unit/ 20,000 sf	1		Above Moderate
515-350-012	0.49	SR	SR	Single-family 1 unit/ 20,000 sf	1		Above Moderate

APN	Acreage	GP Des.	Zoning	Max. Allowable Density	Unit Potential	Site Constraints	RHNA Category Met
515-350-013	0.75	SR	SR	Single-family 1 unit/ 20,000 sf	1		Above Moderate
515-350-014	1.20	SR	SR	Single-family 1 unit/ 20,000 sf	2		Above Moderate
515-350-015	1.55	SR	SR	Single-family 1 unit/ 20,000 sf	3		Above Moderate
515-350-016	0.51	SR	SR	Single-family 1 unit/ 20,000 sf	1		Above Moderate
SE Total	17.92				28		

Figure 1 – Vacant Sites Inventory



Meeting the Regional Housing Need

Table 21 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 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 units.

Table 21: Comparison of Regional Growth Need and Residential Sites

Income Group	2018–2027 RHNA	Site Capacity	RHNA Surplus
Very Low	4	34	26
Low	4		
Moderate	3	8	5
Above Moderate	7	28	21
Total	**18**	**70**	**52**

Source: City of Trinidad, March 2020

Site Constraints

Circulation Infrastructure

All of the vacant and developable lots in the City are accessible by either by existing roads or private access easements and would not require substantial increases in road surfaces if developed. If a proposed subdivision or development may require the construction of additional access roads, the developer is responsible for such construction and such roads would be short in length with only minor traffic (less than 5 units).

Service Infrastructure

The primary constraints to development in Trinidad are limited septic capability and water availability.

Water and Sewer Capacity

The City has its own water system and provides water to residents in the City as well as some properties outside the City within the City Service Area. The County Division of Environmental Health is contracted to serve as the City's Health Department and regulates the design and construction of OWTS. The City has an OWTS Management Program on top of that, which requires operating permits, periodic maintenance and upgrades. The sites included in the sites inventory have water and sewer capacity.

Wastewater

Individual onsite wastewater treatment systems (OWTS) are currently the only means of sewage disposal in the City. Much of Trinidad is more densely developed with smaller lots than what would now be considered adequate for OWTS. Fortunately, much of Trinidad has ideal soils for OWTS, but there is documented bacterial contamination in the water around the City. A significant increase in development and density in Trinidad is not feasible with the use of OWTS. OWTS are likely to remain the primary method of wastewater treatment as there are several major hurdles to the construction of a sewer treatment plant. The initial costs of construction are prohibitive to a community as small as Trinidad, and at this time, funding sources for a sewage treatment plant are generally unavailable. In addition, available land on which to construct such a plant is severely limited, and because the ocean surrounding Trinidad has been designated as an Area of Special Biological Significance (ASBS) with a zero-discharge standard, location of a sewer outfall is also problematic. Trinidad has considered the

feasibility of hooking into the McKinleyville Community Services District's sewer system approximately eight miles to the south, but that is also very expensive. In addition, there is a lot of community resistance to the idea of a centralized sewer due to the potential growth inducing impacts and resulting changes to the character of the community.

The City's land use regulations are based on the long-term use of OWTS for sewage disposal. In order to protect water quality, the City has adopted, and recently started implementing, an OWTS Management Program that requires all property owners to maintain an operating permit for their OWTS that requires periodic inspections and maintenance. The program also requires upgrades and repairs to septic systems at the time of property sales or improvements. City Staff also obtained a Clean Beaches grant which included funding for inspecting and repairing non-functioning septic systems. Through these programs, septic systems for 90 residences in the Trinidad-Westhaven area were repaired or replaced. By ensuring that OWTS are functioning properly development on existing lots under existing zoning can continue. However, there is only so much that can be done, because only so much wastewater can be treated onsite. Therefore, densities will continue to be constrained by the use of OWTS.

Water Supply

Trinidad withdraws its municipal water supply from Luffenholtz Creek, located 1.5 miles southeast of the City. The City has a designated Service Area that extends well outside City limits. All development within City boundaries (221 connections), and some development within County jurisdiction (101 connections), is connected to this system for a total of 322 metered connections. The City has ample water rights, so production capacity of the water plant and low flows on the creek are the primary limiting factors for water supply. The City of Trinidad completed several studies in 2019 to evaluate its water system capacity and future water demand. The water plant has an excess production capacity of about 48,000 gpd, which is more than enough to serve build-out within the City, including ADUs. However, droughts can reduce the water availability, particularly during the late summer when demand is highest. In addition, climate change is expected to result in fewer, larger storms with more runoff and less groundwater recharge. One of the limiting factors at the treatment plant is that the infiltration gallery and wet well, where water is withdrawn from the creek bed, become less efficient at lower flows. Therefore, low flows during droughts or resulting from climate change over time, not only reduce the volume of available water, but the City's ability to extract it. So, the City has taken a conservative approach in determining whether to extend any additional connections outside City limits.

The recent water studies provided other insights into the City's water system. While the system is generally functioning with adequate pressure throughout the system, water loss is high at nearly 30%. The City has made several efforts to find and repair larger leaks, but the remaining leaks are just a function of the old infrastructure that needs replacing. Water storage is minimally adequate with two 150,000-gallon storage tanks (285,000-gallon capacity). This provides enough water for residential fire-fighting needs, but not enough to supply water for more than 2-3 days should something fail. In addition, not enough information regarding flows on Luffenholtz Creek exist in order to be able to accurately predict low return flows. Information is also lacking as to the number and size of existing and potential water rights and diversions on Luffenholtz Creek. Therefore, there is a lot of uncertainty as to the reliability of the City's water supply into the future.

The City's water treatment plant is currently in compliance with state potable water treatment standards. Trinidad's water system currently consists of a 105 gallons per minute (gpm) (138,600 gallons per day (gpd)) capacity surface water treatment plant. This includes recent construction of a new membrane filtration system which decreased capacity from a previous maximum of 176 gpm (253,440 gpd), due to changes in operation needed to meet new State turbidity and chlorine contact standards. Raw water is collected from an infiltration gallery located 10 ft. below Luffenholtz Creek and treated by direct filtration and chlorination. The City maintains

three wet well pumps capable of delivering 120 gpm. The City typically only operates one of the three pumps, but during peak demand periods, the City can run two pumps with the combined flow rate of 220 gpm. The distribution system consists of approximately 13 miles of predominantly asbestos-cement piping and includes two 150,000 gallon redwood storage tanks. 180,000 gallons of storage is reserved for fire flows, leaving 120,000 gallons of storage available for regular use. Periodic upgrades and updates are done as the need arises and funding becomes available.

Table 19 – Summary of Current Water System Capacity, Demand and Availability

Conditions	Flows (in gallons per day)	Notes
Current Treatment Capacity	138,600 gpd	Maximum production capacity
Raw Water Available (worst case drought conditions)	Unknown	N/A
2009 City Peak Day Demand	85,289 gpd	Current system peak demand
Available System Capacity	48,578 gpd	July through October

There is minimal potential for development approved by Humboldt County outside City limits to impact the City's water supply. Existing County policies protect Luffenholtz Creek from significant additional development through its designation as a critical water supply; commercial cannabis is also heavily regulated. The approval of a recent subdivision verified the County's commitment to protecting the City's water supply through the imposition of several strict conditions. In addition, current State law (Government Code Section 56133) does not allow the City to extend services outside of its jurisdictional boundaries without approval of the Humboldt County Local Agency Formation Commission (LAFCo) and the City has prioritized areas that may be annexed in the future for extending water service outside City limits. Climate change, existing unused riparian rights, and illegal diversions could impact, however, the City's supply if not carefully monitored.

To comply with SB 1087, the City will immediately forward its adopted Housing Element to its water and wastewater providers so they can grant priority for service allocations to proposed developments that include units affordable to lower-income households.

Stormwater

As previous mentioned, Trinidad Bay is designated by the State as an ASBS as well as a State Water Quality Protection Area (SWQPA). There are 34 ocean ASBS areas monitored and maintained for water quality by the State Water Resources Control Board (SWRCB). ASBS occur along the entire length of California's coastal waters. They support an unusual variety of aquatic life, and often host unique individual species. Stormwater discharge from the City that is conveyed to the existing outfall has the potential to impact the sensitive habitat within the ASBS. Primary pollutants and threats to water quality that have been identified are bacteria, nutrients, sediment, and hydrocarbons.

In 2004, the City received a letter from the State Water Resources Control Board regarding the "Prohibition of Waste Discharge into the kelp beds at Trinidad Head ASBS." This led to a series of monitoring and planning activities that culminated in the Trinidad-Westhaven Integrated Coastal Watershed Management Plan. Through that process, stormwater was identified as a primary constituent of concern, and initial plans for implementing BMPs and infiltrating stormwater were developed.

The City received a temporary exemption to the prohibition which requires a number of special conditions

including MS4 requirements. Compliance with the substantial conditions of the discharge exception is prohibitively difficult for a City the size of Trinidad with limited staff and budget resources. The ASBS Compliance Plan requires structural BMPs in order to meet the Instantaneous Maximum Water Quality Objectives of the CA Ocean Plan and the "Natural Water Quality Guidelines." In addition to compliance with regulations, water quality impairments from the discharge of polluted runoff has potential to damage the ASBS ecosystem which could impact the City residents, many who rely on tourism and fishing for income which are both recognized beneficial uses of the ASBS. The beaches along the ASBS also provide an area for water contact and non-contact recreation, including aesthetic enjoyment. Unfortunately, poor water quality discharges threaten these beneficial uses and the inhabitants of the ASBS.

To address this issue, the City applied for grant funding for improvements to the stormwater system that are being constructed in phases, with the final phase set for construction in 2020. The purpose of the project is to infiltrate the City's stormwater in a series of swales, raingardens and infiltration chambers and eliminate the stormwater outfall altogether. As part of the project planning, the City conducted a comprehensive geotechnical and groundwater study and built a peer-reviewed groundwater model. These were necessary to determine if infiltration of stormwater would impact leachfields and bluff stability, which were two primary concerns. The model was used for locating infiltration basins such that they would not impact leahfields and bluff stability. However, the model did show that unregulated infiltration of stormwater along with inputs from leachfields can negatively impact bluff stability, which limits potential growth in the City.

Seismic / Slope Conditions

Seismicity

The City of Trinidad lies within a geographic region laden with numerous seismic faults and shear zones. The entire northern coast of California is subject to seismic activity, due mainly to the proximity of the Mendocino Triple Junction (MTJ). Multiple tectonic plates (pieces of the Earth's crust) collide off the coast of northern California and southern Oregon to form the MTJ. In particular, this is where the San Andreas Fault meets the Cascadia Subduction Zone (CSZ), a 750-mile-long thrust fault capable of producing a megathrust quake of magnitude 9.0 or more. The tectonic activity most relevant to Humboldt County is the movement of the Gorda and Juan de Fuca plates underneath the North American plate. This movement causes the Earth's crust to compress and break, resulting in an extensive system of onshore faults and frequent offshore earthquakes. The Trinidad Fault, an active fault that is part of the Mad River Fault Zone, runs through a portion of town. There are also several other small offshoots of the Mad River Fault that run through Trinidad's Planning Area, or just offshore, most of which are not considered active.

Most local earthquakes originate offshore, within tectonic plates rather than along plate boundaries. The Gorda plate is most susceptible to seismic activity because it undergoes a large amount of stress, and consequent fragmentation, as it is pushed beneath the North American plate. Offshore, intraplate quakes are generally less damaging to human communities than onshore quakes, but they can still be quite large. The type of potentially damaging quake most likely to occur would be centered offshore with a magnitude between 5.0 and 7.5. Onshore earthquakes are less probable, having an average recurrence interval of 20 years. This type of quake could have a magnitude of 7.5 to 8.0, which would be more intense, and more damaging, than any modern historic quake. Although most earthquakes in the region originate offshore within the Gorda plate, they can also occur on the CSZ boundary. Evidence of prehistoric subduction zone earthquakes suggests that they could have magnitudes of 8.0 to 9.0 ore more on an interval of every 300 to 600 years; the most recent one occurred in 1703. There is little that can be done to prepare for and mitigate damage from a large CSZ quake other than warning and evacuation systems

The general risks associated with earthquakes in the Trinidad area are structural damage, slope failures, liquefaction, and tsunamis. With the exception of tsunamis, these risks tend to be greater in areas of unstable slopes, wet conditions, alluvial deposits, or fill material. Trinidad is less vulnerable to damage and inundation of residential areas resulting from tsunamis due to its elevation and protective bluffs, but significant toe erosion could occur, compromising slope stability. In addition to occasional tsunamis, the City is susceptible to violent wave attacks during harsh winter storms. Development in the lower, more exposed portion of the near shore area must continue to be avoided to ensure its protection from waves.

Stability

Local topography is characterized by a series of marine terraces, which in cross-section have the appearance of wide stair-steps. These gently sloping surfaces were formed in the geologic past by wave erosion and deposition, and have been moved above sea level due to periodic sea-level changes and uplifting of the coastline. The terrace surfaces range in elevation from about 140 feet at the western edge of town, to 600 feet at the eastern edge of the Trinidad area. Most of the ground surface in Trinidad has a slope of 15% or less, but steeper slopes are found at sea cliffs, stream banks, and the boundaries between marine terraces.

The Franciscan bedrock that underlies Trinidad is composed of pieces of relatively resistant rock within a matrix of sheared, unstable material. Area geology is characterized by outcroppings of this material, especially at the coastline, and by the poorly consolidated alluvial deposits that cover the surfaces of the marine terraces. These different materials are subject to erosion and various types of slope failure.

Portions of Trinidad are composed of moderately to highly unstable slopes. Such slopes are prone to accelerated erosion and mass movement during earthquakes, storms, periods of high water tables, and as a result of poorly planned nearby construction. The City requires geologic reports for any parcel mapped as 'unstable' or of 'questionable stability' on Plate 3 (Slope Stability) of the City's General Plan (Figures 9a or 17 in the Draft General Plan update). It is also worth noting that development may be limited in areas near bluffs. Areas that have been mapped as being 'unstable' have been zoned either Open Space (OS) or Special Environment (SE) to limit or preclude development.

Rates of bluff retreat vary along the coastline depending on local bedrock characteristics and degree of protection from waves. Coastal bedrock varies from sheared and fractured shales, which are highly erodible, to erosion-resistant diorite and greenstone. Bluff retreat also occurs at different rates over time, as rates of sea level rise and geologic uplift change. Most of the Trinidad coast is approaching an equilibrium state, meaning that sea cliff erosion is more or less balanced by geologic uplift. The rates of these processes, however, are not constant and cannot be predicted.

Steep slopes and unstable geologic material create erosion and landslide hazards in some of the Trinidad area. Coastal bluffs are especially subject to these hazards because of continuous wave erosion, which could be exacerbated by climate change and sea level rise. Development should be located far enough from the edge of the bluffs so that structures are not in danger of being undercut by wave activity in the foreseeable future. Development should also be restricted in areas of steep slopes or those dominated by the clayey matrix component of the Franciscan Complex, as these materials are susceptible to earthflows and debris flows

Service Infrastructure

The current minimum lot size in Trinidad is 8,000 s.f. for the Urban Residential (UR) zone and 20,000 s.f. for the Suburban Residential (SR) zone. Both of these minimum lot sizes are less than what the County Division of Environmental Health (DEH), which serves as the City's Health Department, currently allows for lots that utilize septic systems. The minimum lot area allowed in the Planned Development (PD) zone is 2,500 s.f. per lot for planned developments with five or more dwellings, but the maximum density is still one residential unit per

8,000 sq. ft. There are many lots in town that do not meet the minimum size requirement, and at least 4,000 to 5,000 sq. ft. is generally necessary to accommodate a small residence with a septic system; the City's regulations allow lots smaller than the minimum size to be developed as long as wastewater disposal requirements can be met.Under the City's Land Use Plan (LUP), all new individual septic systems must meet the minimum standards set by the State and Regional Water Quality Control Board (RWQCB) and DEH. Septic requirements will likely be a limiting factor for any future developments. The City has an Onsite Wastewater Treatment System (OWTS) Management Program in place that requires all systems to be regularly inspected and maintained through an operating permit system.

The City has a water ordinance, but it does not limit uses based on expected water demand and does not put any volume limits on users. However, "change in the intensity and use of water" falls under the Coastal Act's and City's definition of development. And the City has started discussions about how to revise the regulations and policies to better monitor and control individual water use as well as to make it a consideration in approving permit applications. Due to a substantial water request from the adjacent Trinidad Rancheria to build a hotel, the City has recently been focused on developing policies for evaluating connection requests from outside City limits. Once that is complete, the City will look at addressing existing users and requests from inside City limits as the recent water studies have shown that the City's water supply is more limited than previously thought. Water supply is likely going to become more of a limiting factor for development in the future.

ii. Seismic / Slope Protections

Within the City, the Trinidad Fault (part of the Mad River Fault Zone) has been designated under the Alquist-Priolo Act of 1972 (Fig. 17, Noise and Safety Element). Approximately 60 acres in the Trinidad area lie within this Special Study Zone, as designated by the State Division of Mines & Geology under the Alquist-Priolo Fault Hazard Zoning Act. Although this equates to approximately 19% of Trinidad's land area, much of it runs along the freeway corridor, and most of the affected lots are large, or already developed, and several of the parcels have already been investigated for faults. The purpose of the Zone is to ensure that local development patterns do not create seismic hazards. In this Zone, any subdivisions or new development of structures for human occupancy, other than a single-family wood-frame dwelling less than 2 stories, would be required to undergo a geologic study. According to the Alquist-Priolo Act, no buildings may be constructed within 50 feet of any active fault in the Zone. All buildings outside this buffer, and throughout the rest of Trinidad, are subject to specific design guidelines established by the City including a Fault Study for subjected properties. All of Humboldt County falls under UBC zone 4, which is the highest factor of safety for seismic hazards. There are also several other small offshoots of the Mad River Fault that run through Trinidad's Planning Area, or just offshore. These faults do not constrain development because they are either located offshore or are older and not considered active.

The Trinidad Land Use Plan (LUP) states that no new development may occur on unstable lands. Such development may include the construction of buildings and driveways or the placement of individual septic systems. These specific development types may not occur on sites of questionable stability, or within 100 feet upslope of such sites, unless the proposed development is analyzed and found not to increase instability by a registered geologist. In addition, no new structures may be located on the shoreline less than 20 feet above the Mean Lower Low Water line, with the exception of harbor and public access facilities. Most development of unstable and shoreline site is restricted by the City's zoning regulations, and most of these areas are zoned Open Space and Special Environment, which prohibit most development in these locations.

Dry Utilities

Dry utilities, including electricity, and telephone service, are available to all areas within the City. The extension of power to service new residential development has not been identified as a constraint. No natural gas lines exist in Trinidad, so individual property owners maintain propane tanks.

Service providers are as follows:

- Electricity: Pacific Gas and Electric Company (PG&E
- Telephone: AT&T
- Fiber Cable: Suddenlink

Constraints on the Development of Housing

Various interrelated factors can constrain the ability of the private and public sectors to provide adequate housing and meet the housing needs for all economic segments of the community. These factors can be divided into two categories: (1) governmental constraints and (2) nongovernmental constraints. Governmental constraints consist of land use controls, development standards, processing fees, development impact fees, code enforcement, site improvement costs, development permit and approval processing, and provision for a variety of housing. Nongovernmental constraints consist of land availability, the environment, vacancy rates, land cost, construction costs, and availability of financing.

Governmental Constraints

Governmental constraints are policies, standards, requirements, or actions imposed by the various levels of government upon land and housing ownership and development. Although federal and state agencies play a role in the imposition of governmental constraints, these agencies are beyond the influence of local government and are therefore not addressed in this document.

Zoning Standards

Due to the small lot sizes and septic space requirements, off-street parking requirements could be a limiting factor for potential new development, particularly residential units added to existing commercial structures as promoted by policies to encourage mixed use. To some extent, parking requirements (1 additional space) may also limit the development of second units on small residential lots, but it is likely that septic requirements are more of a factor. This is not considered a significant constraint due to the high level of build-out on these properties and the low number of inquiries desiring second units.

The City's Zoning Ordinance currently has a parking-in-lieu alternative when there would otherwise be a shortage of off-street parking in the mixed use (PD) zone. However, this alternative has not been used for many projects since being incorporated into the Zoning Ordinance and has been controversial when used; variances for parking have been more common. The City currently requires a use permit for all multifamily development. Program HI-14 has been included to monitor this process to ensure it does not cause a constraint to development. Development standards for the three residential zoning designations are shown in Table 20.

Table 20 – Development Standards from the City of Trinidad Zoning Ordinance*

Zone	Use Permit	Minimum Lot Area	Density Unit/s.f.	Setbacks F-R-S	Off-Street Parking # Spaces/Unit
SR (Suburban Residential)					
Single-Family	No	20,000 s.f.	1/20,000	30-20-10	2/unit
Two-Family	Yes	20,000 s.f.	1/20,000	30-20-10	2/unit
UR (Urban Residential)					
Single-Family*	No	8,000 s.f.	1/8,000	20-15-5	2/unit
PD (Planning Development)					
Less than 5 Units	Yes	8,000 s.f.	1/8,000	20-15-5	2/unit
5 or More Units	Yes	2,500 s.f.	1/8,000	**	1.5/unit

This does not include provisions for accessory dwelling units that have been adopted by the City, but have not yet been certified by the Coastal Commission for implementation. Where the two-thousand five hundred square foot minimum lot area applies (For Planned Developments with five or more dwelling or commercial units), no setbacks are required, except when adjacent to any other zone the yard shall be the same as that required in the adjacent zone.*

Parking Standards

The City's parking requirements vary according to the type of dwelling unit, as shown in Table 21.

Table 21: Residential Parking Standards

Type of Residential Development	Required Parking
Single Family and Mobile Home Dwellings	Two parking spaces + any garage spaces
Attached dwellings (duplex, townhouse)	1.5 spaces per dwelling unit
Accessory Dwelling Unit	One parking space

Source: City of Trinidad Municipal Code, Section 17.56.180.

Provisions for a Variety of Housing

Housing element law specifies that jurisdictions must identify adequate sites to be made available through appropriate zoning and development standards to encourage the development of various types of housing for all economic segments of the population. This includes single-family housing, multifamily housing, manufactured housing, mobile homes, emergency shelters, and transitional housing. Table 22 summarizes the permitted housing types.

Table 22: Housing Types Permitted by Zoning District

Residential Use	Zone						
	SE	SR	UR	PD	VS	C	PR
Single-Family — Detached	P	P	P	UP	UP	UP	-
Single-Family — Attached	-	-	-	-	-	-	-
2-4 Dwelling Units	-	-	-	UP	-	-	-
5+ Dwelling Units	-	-	-	-	-	-	-
Residential Care < 6P	-	-	-	-	-	-	-
Residential Care > 6P	-	-	-	-	-	-	-
Emergency Shelter	-	-	-	-	-	-	-
Single-Room Occupancy	-	-	-	-	-	-	-
Manufactured Homes	P	P	P	UP	UP	UP	-
Mobile Homes	P	P	P	UP	UP	UP	-
Transitional Housing	-	-	-	-	-	-	-
Farmworker Housing	-	-	-	-	-	-	-
Supportive Housing	-	-	-	-	-	-	-
Accessory Dwelling Units	UP	UP	UP	UP	UP	UP	-

Source: City of Trinidad Municipal Code, 2019
"P" = Permitted "UP" = Special Use Permit "-" = Not Permitted

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.

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.

Local Processing and Permit Procedures

Shown in Table 23 are the typical permit processing times for residential development.

Table 23: Typical City Permit Process and Timelines

Project Type	Typical Processing Time
Conditional Use Permit	5 to 10 weeks
Zone Change	8 to 12 weeks + Coastal Commission processing time of several months to a year
General Plan Amendment	8 to 12 weeks + Coastal Commission processing time of several months to a year
Site Plan Review (non-discretionary)	N/A
Design Review	4 to 8 weeks
Tract Maps (Major Subdivisions)	N/A
Parcel Maps (Minor Subdivisions)	3–4 months minimum of staff time (not including applicant's revisions or special studies)
Initial Environmental Study	2 weeks preparation (excluding special studies); 8 weeks processing
Environmental Impact Report	N/A

Source: City of Trinidad, 2020.

Shown in Table 24 are the typical processing procedures for residential development.

Table 24 Typical Processing Procedures by Project Type

	Single-Family Unit	Subdivision	Multifamily < 5 Units
Typical Approval Requirements	Coastal Development Permit	Tentative Map Review (including approval by Planning Commission and City Council)	Coastal Development Permit
	Design Review	CEQA	Design Review
Est. Total Processing Time	4 to 8 weeks	9 months	8 to 12 weeks

Source: City of Trinidad, 2020.

Design Guidelines

The City of Trinidad details its design guidelines in Chapter 17.60 of its Municipal Code. The City's design guidelines aim to preserve the community's identity by the coastline by preserving lines-of-sight and viewsheds, the size and bulk of structures, and the community's unique character. The guidelines include the following regulations:

- The project should be designed to the site rather than modifying the land to fit the development;
- Color palettes for buildings next to open spaces should use "natural" tones;
- Pre-set designs should be avoided – each project must match its surroundings;
- Vacant lots in the SR and UR zones are guaranteed a height of at least 15 feet and a floor area of at least 1,500 square feet even if the structure would obstruct views of the harbor, Little Trinidad Head, Trinidad Head, or the ocean from public roads, trails, and vista points;
- Similarly, any site plans for buildings erected within 100 feet to any of the historic landmarks in the City may be reviewed and amended so as not to cause view blockages of these historic resources.

For the full list of design guidelines please refer to the Trinidad Municipal Code. None of these design guidelines seem to be a burden on new housing development in Trinidad.

Planning and Building Permit Fees

The City uses full-cost recovery for its planning, building, and community development permitting and ministerial approval processes. The minimum deposit charged to applicants for community development permits (e.g. use permit, design review, ministerial review, etc.) is $750 but costs usually can exceed $1,400 during typical plan review.

Development Fees

The City does not have development impact fees.

Building and Code Enforcement

Building Standards

The City of Trinidad's Municipal Code indicates that the officially adopted building standards on file are the 1997 Uniform Codes. The City has indicated, however, that staff have been using the 2016 Edition of the California Building Code (CBC). It is unclear if there are any local amendments to the 2016 CBC. Trinidad's officially adopted codes include:

- Uniform Building Code (1997 Edition) and the Uniform Building Code Standards (1997 Edition);
- Uniform Mechanical Code (1997 Edition);
- Uniform Housing Code (1997 Edition);
- Uniform Code for the Abatement of Dangerous Buildings (1997 Edition);
- Uniform Fire Code (1997 Edition);
- Uniform Plumbing Code (1997 Edition);
- National Electric Code (1997 Edition);
- Uniform Sign Code (1997 Edition); and

- Uniform Administrative Code (1997 Edition).

The City has amended the Uniform Building Code to match the local context by making the following housing development-related adjustments:

- Allowing the Building Inspector to halt occupancy and require property owners to bring buildings into compliance with load-bearing or setback regulations if they exceed the City's officially-adopted ordinances;
- Creating a Board of Appeals body to approve buildings materials and construction methods—full details of this body are defined in Trinidad Municipal Code subsection 15.04.050;
- Mandating possession of building permits from the Building Official for certain activities as described in Trinidad Municipal Code subsection 15.04.060;
- Amending certain aspects of the Building Permit approval process as detailed in Trinidad Municipal Code subsection 15.04.070;
- Allowing the Building Official to employ a consultant if the Official requires specialized knowledge for ministerial review of an application; and
- Requiring the possession of an encroachment permit by an applicant if work occurs in a public right-of-way.

The City of Trinidad Planning and Building Services Department views code enforcement as the means to ensure safe and uniform construction practices critical to providing decent, suitable shelter for all economic segments of the community, and to safeguard the general health, safety, and welfare of the community. Therefore, enforcement of the Building Code is not viewed as an obstacle to the provision of affordable housing in the city. The Department will, however, need to adopt and transition over from the Uniform Building Code to the most recent version of the California Building Code to ensure maximum safety and sustainability of all future housing structures. This also helps ensure full compliance with the latest state building regulations and goals. At the time of writing, the most recent version of the California Building Code is the 2019 Edition, which many jurisdictions in California adopted in January 2020.

On- and Off-Site Improvements

On- and off-site improvement requirements consist primarily of paving of off-street parking and construction of wastewater and drainage facilities. These requirements are comparable with other surrounding jurisdictions and are not excessive. Most streets in Trinidad don't have sidewalks or curbs, and improvements aren't usually required for new development, which reduces some of the burden on property owners. Some additional septic and storm water regulations or conditions are being considered as part of the current General Plan update because of bluff saturation issues and the sensitive environments around Trinidad, including the Trinidad Head Area of Special Biological Significance (ASBS) / State Water Quality Protection Area (SWQPA) and Tsurai Study Area. Setbacks and lot coverage restrictions are also comparable to surrounding jurisdictions and do not represent a constraint to development. Trinidad does have a 2,000 sq. ft. maximum floor area guidelines for residential structures, which helps to keep homes modestly sized and priced.

Review of Local Ordinances

The City does not have any locally adopted ordinances that hinder the development of housing.

Local Coastal Plan

The City's Local Coastal Plan (LCP) implements Coastal Act policies which include review of new development for compliance with design review and view protection findings. These tend to result in some restrictions on development to minimize the bulk or structures, or 'mansionization' and to preserve viewsheds. However, there are no known cases where development was precluded. All policies are applied as equally as possible, considering the somewhat subjective criteria and public involvement, regardless of the type of development proposed.

The most notable of these constraints are the mandates set forth by the California Coastal Commission (CCC) pursuant to the California Coastal Act. Almost the entire City of Trinidad falls within the Coastal Zone, meaning that all proposals for new development are subject to the standards and regulatory procedures included in the City's Local Coastal Program (LCP). At the heart of the LCP is the Trinidad Land Use Plan (LUP), equivalent to a General Plan, which establishes numerous land use regulations relevant to the City's coastal location and characteristics.

In general, the purpose of an LCP is to allow for a partnership between the State and local governments in protecting the Coastal Zone from expansive, environmentally detrimental development. Several Coastal Act policies may apply to development proposals in Trinidad. These should be considered when assessing governmental constraints to development within the City. They are as follows:

- Maximum public access and recreational use of the coast must be provided, with consideration of private property rights and the environment;
- Marine and land resources, including riparian areas, tide pools, wetlands, and rare and endangered habitat areas must be protected;
- The scenic integrity and viewsheds of the coastal landscape must be preserved

It is also important to note that, under the Coastal Act, coastal-dependent development proposals (such as those oriented toward recreation or tourism, or those involving the organized study of coastal/marine resources) receive higher approval priority by the Coastal Commission than do non-coastal-dependent developments (such as residential dwellings). This is particularly true in certain designated areas such the Trinidad Harbor area and Visitor Service areas; in addition, the CCC generally encourages short-term / overnight accommodations, including vacation rentals, as long as coastal resources are protected.

At this time, the City of Trinidad is currently updating its LCP. It will be critical that the LCP and the Housing Element update work concurrently to achieve both the goals of protecting Trinidad's coastline while also helping the City fulfill its RHNA requirements and associated housing goals for this planning cycle.

Nongovernmental Constraints

Development Costs

Local residential construction cost information was not readily available for the City of Trinidad but residential construction cost data for Fortuna and Arcata—two Humboldt County cities which are similar in size and location both along US-101 and the coastline—was available. In Arcata, single-family residential construction costs ranged from $122 to $136 per square foot in 2019. Based on that estimate, the total construction cost for an average 1,200 square-foot single-family home would therefore equate to as low as $146,400 or as high as $163,000 total. The average multi-family residential development construction cost in Arcata was slightly higher at an approximate $245 per square-foot. Based on that estimate, the total construction cost for a multi-family

development consisting of a gross total of 8,000 square feet was an estimated $1,959,696. This equates to an approximate construction cost of $244,962 per each 1,000 square-foot unit in the 8,000 square-foot, multi-family residential shell space. In Fortuna, the average single-family residential construction cost per square foot was $156 in 2019. Based on that estimate, therefore, the gross construction cost for a 1,200 square-foot, single-family home in Fortuna would be an estimated $187,200. There were no estimates available for multi-family residential construction costs in Fortuna.

Construction costs for both single- and multi-family residential developments in Trinidad, therefore, are most likely similar to these estimates in both Fortuna and Arcata.

Construction costs vary widely according to the type of development, with multifamily housing generally less expensive to construct than single-family homes. However, wide variation within each construction type exists depending on the size of the unit and the number and quality of amenities provided, such as fireplaces, swimming pools, and interior fixtures, among others.

In addition to construction costs, the price of land is one of the largest components of housing development costs. Land costs vary depending on whether the site is vacant or has an existing use that must be removed. Similarly, site constraints such as environmental issues (i.e., steep slopes, soil stability, seismic hazards, or flooding) can also be factor in the cost of land. Other costs stem from professional services such as land surveying and engineering, soils engineering/analysis, site design, landscape and architectural design, and permit processing.

If labor or material costs increase substantially, the cost of construction in Trinidad could rise to a level that impacts the price of new construction and rehabilitation. Therefore, increased construction costs have the potential to constrain new housing construction and the rehabilitation of existing housing. The City will continue to do its part in reducing development processing times and providing a more streamlined review process.

Availability of Financing

The cost of borrowing money to finance the construction of housing or to purchase a house affects the amount of affordably priced housing in Trinidad. Fluctuating interest rates can eliminate many potential homebuyers from the housing market or render a housing project that could have been developed at lower interest rates infeasible. Typically, when interest rates decline, sales increase. The reverse has been true when interest rates increase. Table 26 illustrates interest rates as of March 2020. The table presents both the interest rate and the annual percentage rate (APR) for different types of home loans.

Table 26: Interest Rates

Conforming	Interest	APR
30-Year Fixed	3.500	3.624
15-Year Fixed	2.625	2.843
5-Year ARM	3.000	3.284
Jumbo		
30-Year Fixed	3.375	3.409
7-Year ARM	2.500	2.969

Source: www.wellsfargo.com, March 2020.

Price of Land

An online survey of listings of vacant lots on Trulia and Craigslist in March 2020 indicated that there were no vacant lots available for sale in Trinidad proper but there was one vacant lot for sale and two lots had recently been sold within the unincorporated lands immediately outside of the city limits. These lot costs ranged from $235,000 to $500,000 with the median cost being $299,000 and the average cost being $344,667. If any vacant lots were to be sold in Trinidad in the future, they would likely be sold at similar price or even higher since the amount of developed lands versus undeveloped lands in Trinidad is higher than in Unincorporated Humboldt County.

The City provided additional data summarizing land sales within the last five years. Table 27 describes each year the land sales occurred and how much each lot was sold for.

When viewing all the data, it becomes clear that most vacant lots tend to be sold between $150,000 and $400,000 in Trinidad. This is consistent with the current for-sale vacant lots in Unincorporated Humboldt County immediately outside Trinidad.

Table 27: Vacant Lots Sold 2015-2018

APN	Year Sold	Cost
515-331-049	2015	$150,000
515-331-048	2015	$188,318
042-031-028	2016	$390,150
042-081-024	2018	$263,000
042-031-028	2018	$390,150
042-041-056	2018	$700,000

Source: City of Trinidad, 2020

Residential Energy Conservation

Housing elements must include a review of opportunities to encourage energy conservation in residential development (Government Code Section 65583(a)(7)). Energy conservation policies could reduce housing costs, promote sustainable design, and help reduce greenhouse gases. Title 24 of the California Administrative Code sets mandatory energy standards for new development and requires the adoption of an "energy budget."

The California Department of Housing and Development encourages jurisdictions to take steps toward better energy conservation through their housing element updates. Policy ideas are listed on HCD's website to help jurisdictions toward this goal. Additional resources are listed below.

Energy Conservation Resources

California Solar Initiative Rebates

Rebates vary according to system size, customer class, and performance and installation factors (www.gosolarcalifornia.org). There are two rebate programs: Expected Performance-Based Buydown (for systems that are less than 30 kilowatts) and Performance-Based Incentive (for all systems greater than 30 kilowatts).

Single-Family Affordable Solar Housing

The Single-Family Affordable Solar Housing (SASH) program offers incentives to qualified low-income homeowners to help offset the costs of a solar electric system. The SASH program is overseen by the California Public Utilities Commission and administered by GRID Alternatives, a nonprofit organization.

California Solar Initiative Multifamily Affordable Solar Housing

The Multifamily Affordable Solar Housing (MASH) program offers solar incentives for qualifying affordable multifamily dwellings. The program is overseen by the California Public Utilities Commission and offers incentives to qualifying affordable housing within the service territories of PG&E, Southern California Edison Company, and San Diego Gas & Electric. MASH provides fixed, upfront, capacity-based incentives for qualifying solar energy systems. The amount of the incentive depends on which track the applicant is eligible for.

Federal Solar Investment Tax Credit

The Federal Investment Tax Credit (ITC) for residential and commercial solar systems is 26 percent of net system cost. This tax credit is available on residential properties that commence construction by 2020. The ITC then steps down to 22 percent in 2021. After 2023, the residential credit will drop to zero, while the commercial and utility credit will drop to a permanent 10 percent.

Redwood Coast Energy Authority and Pacific Gas & Electric

PG&E owns and maintains all the electrical and natural gas infrastructure in Humboldt County. In May 2017, all electrical services were transferred from PG&E's management to a newly-appointed joint power authority called the Redwood Coast Energy Authority (RCEA). The RCEA includes the County of Humboldt; the cities of Arcata, Blue Lake, Eureka, Ferndale, Fortuna, Rio Dell, and Trinidad; and the Humboldt Bay Municipal Water District. RCEA's goal is to implement sustainable energy programs to reduce energy demand and enhance regional energy efficiency. RCEA's energy sources come from more renewable sources (e.g. biomass & biowaste,

geothermal, eligible hydroelectric, solar electric, and wind).Residents may opt out of RCEA's power supply and return to PG&E service when they wish but residents otherwise are automatically opted in by default to RCEA's power service when they purchase property in Humboldt County. RCEA currently has a goal to adopt completely renewable energy sources by 2025 and furthermore achieve 100% local renewable electricity in 2030.

The Authority administers a number of programs for its customers, including residents in Trinidad, including:

- Free Energy Advisor Consultation.
- Supporting installations of electric vehicle charging stations.
- Free Energy Efficiency Kit.

For residents who opt out of RCEA and return to PG&E energy service, PG&E offered the following energy conservation programs as of March 2020 (www.pge.com):

- SmartAC. Provides free equipment and installation for the efficient regulation of central air conditioning systems and heat pumps for residential and small business customers.
- AC Quality Care Program. Provides rebates to customers to help pay for work done by AC Quality Care certified contractors.
- Energy analyzers and calculators (online).
- Zero Net Energy (ZNE) program. Began in 2010 to support the 2008 California Long Term Energy Efficiency Strategic Plan; ZNE goals state that all new residential construction will be ZNE by 2020.
- Rebate Program. Offers a range of rebates on energy-saving products for residential owners.
- Home Upgrade program. Offers up to $4,500 in rebates from PG&E for energy-efficiency upgrade projects.
- Energy Upgrade California Home Upgrade rebate program.

Local Program

As of March 2020, the City of Trinidad had not published any current plans or programs relating to energy conservation.