



HUMBOLDT COUNTY

2019 GENERAL PLAN ANNUAL REPORT

Prepared by Humboldt County Planning and Building Department March 25, 2020

Board of Supervisors to be scheduled for review and acceptance ASAP (As Soon As Practical)

TABLE OF CONTENTS

Introduction	3
General Plan Status	4
Overview of Consistency with State General Plan Guidelines.....	4
2019 General Plan Amendments and Other Major Land Use Accomplishments	5
5 th Cycle Housing Element Implementation	10
Needed Action	14

TABLES AND FIGURES

Table 1.	Additional General Plan Work Programs
Table 2.	Details of Other General Plan Implementation Progress
Figure 1.	Building Permits Issued 2014– 2018
Table 3.	Comparison of Housing Units Constructed and Projected Housing Needs; Humboldt County Unincorporated Areas, 2014 – 2018
Table 4.	Residential Land Inventory Summary

APPENDIX

Appendix A.	2019 Housing Element Annual Progress Report to State of California Housing and Community Development on Housing Element Implementation (Under separate cover)
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Introduction

Government Code Section 65400(a)(2) requires planning agencies to provide a generalized annual report on the status of general plan implementation and progress made toward meeting the jurisdiction's regional housing needs allocation. The annual progress report ("APR") will be provided to the local legislative body this year after the APR is filed with the Office of Planning and Research and the Department of Housing and Community Development. It was scheduled to be reviewed by the Humboldt County Board of Supervisors on March 24, 2020 but the meeting was cancelled to comply with state social distancing requirements. The General Plan APR is to be filed with the State by April 1. There is no standardized form or format for the general plan APR, although the Office of Planning and Research does provide guidance.¹ The annual reporting requirements for the housing element, on the other hand, are prescribed by statute with mandatory reporting forms provided by the Department of Housing and Community Development ("HCD").

The content of general plan APRs is specified in Government Code Section 65400(a)(2) and is as follows:

- The date of the last revision to the general plan.
- The status of the general plan and progress in its implementation.
- The degree to which the jurisdiction's approved general plan complies with the general plan guidelines ("GPG") developed and adopted pursuant to Section 65040.2 by the Governor's Office of Planning and Research ("OPR").
- The jurisdiction's progress in meeting its share of regional housing needs determined pursuant to Section 65584, local efforts to remove governmental constraints to the maintenance, improvement, and development of housing pursuant to paragraph (3) of subdivision (c) of Section 65583. Some of the additional detailed reporting for the Housing Element includes: the number building and planning permits for housing units applied for; the number of building and planning permits approved, issued, and disapproved; the number of housing units constructed by way of issued certificates of occupancy or finales; the number of housing units demolished and not replaced. For all housing units the estimated affordability and tenure of the units.

The purpose of this General Plan APR is to inform the Board of Supervisors and the residents of Humboldt County on the implementation status the General Plan for the time period from January 1, 2019 to December 31, 2019. This annual report also covers the 2018 calendar year time period. Reporting the implementation status of the General Plan includes reviewing major land use activities undertaken during the reporting period. The APR process provides information that may surface the need to consider "course adjustments" or modifications to the general plan and any methods to improve implementation. Essentially, the APR provides accountability and transparency to the Board and the community on the progress made on the General Plan during the previous year.

Governance Implementation Measure G-IM1, Humboldt County General Plan, specifies the County's General Plan APRs are to be presented to the Board of Supervisors in a public hearing and copied to the Planning Commission. The public hearing requirement specified in G-IM1 establishes a higher bar for consideration of the APR than statute mandates, indicating accountability and transparency are local priorities.

¹ See the Office of Planning and Research letter dated April 25, 2019: http://opr.ca.gov/docs/20190426-APR_Memo_Post.pdf

This report has been prepared in accordance with Government Code Section 65400. While the County filed its 2019 Housing Element APR by the April 1, 2020 statutory deadline, the preparation of the General Plan APR and the public engagement efforts on both of these reports has been on slower track as available staff resources have been used for completing critical General Plan implementation programs and legislative mandates, i.e., update and adoption of the 2019 Housing Element, zoning text and map amendments that implement the General Plan, preparation of an industrial hemp ordinance and climate adaptation planning.

Consideration and acceptance of the General APR is informational in nature, does not create or alter policy, and is exempt from the requirements of the California Environmental Quality Act ("CEQA") pursuant to the CEQA Guidelines Section 15306.

General Plan Status

On October 23, 2017 the Humboldt County Board of Supervisors certified the Final Environmental Impact Report (State Clearinghouse No. 2007012089) for the General Plan update and approved the comprehensive update of the Humboldt County General Plan by Resolutions 17-94, 17-95, and 17-96. The General Plan was approved after 66 public hearings by the Board of Supervisors beginning in 2000 and more than 100 public hearings by the Planning Commission. The General Plan establishes the kinds, locations, and intensities of land uses as well as applicable resource protection and development policies. Land use maps are used to show land use plan designations, constraints, and public facilities.

Overview of Consistency with State General Plan Guidelines

As stated above, Government Code Section 65400(a)(2)(F) requires jurisdictions to report the degree to which the jurisdiction's approved general plan complies with the State General Plan Guidelines ("GPG") prepared by Governor's Office of Planning and Research ("OPR") in their annual progress report. To begin with the GPG are prepared and periodically updated by OPR. The GPG are to assist local governments in preparing general plans and the public in participating in that process. While the GPG provide an authoritative interpretation of state statutes and case law as they relate to planning, the GPG are advisory rather than prescriptive. As such jurisdictions are able to address contemporary planning topics in a locally appropriate manner. The Humboldt County General Plan used the GPG published in 2003 to guide the preparation of the update, as the planning effort began in the early 2000s. While OPR published revised GPG guidelines August 2017, these were not employed to guide the General Plan update as the process was in its final stages. At the time of the August 2017 GPG release, the General Plan Draft Environmental Report had been prepared, circulated, and public comments received and responded to; numerous public workshops and hearings had already been held to capture the community's visions and priorities. To prepare this APR Planning staff reviewed the current GPG and determined that the County's General Plan meets the mandatory requirements described therein with incorporation of the work program contained in Table 1. The below discussion reviews how the County's General Plan meets the GPG.

The 2017 approved General Plan contains eight of the nine mandatory elements: land use, circulation, housing, conservation, open space, noise, safety, and air quality. The ninth element is the environmental justice ("EJ") element. The Humboldt County General Plan was approved in October 2017 which was prior to the effective date of Government Code Section 65302(h)(2) that directs cities and counties to prepare an EJ element. The preparation of an environmental justice element is also triggered upon the adoption of the revision or two or more elements concurrently on or after January 1, 2018. During the reporting period of this APR, no general plan elements

have been updated; therefore, the requirement to prepare the EJ has not yet been triggered.

Tribal consultation pursuant to SB 18 and AB 52 were undertaken and completed as part of the General Plan update process. On a project-by-project basis, local tribes are consulted pursuant to AB 52 and SB 18. The County's commercial cannabis land use regulations, Humboldt County Code Section 314-55.4 et seq., require tribal consultation for ministerial and discretionary projects.

Another matter that is important to include in the GP APR is collaborative planning with the military lands and facilities. The only military installation in the region is the Eureka Armory located entirely within the boundaries of the City of Eureka. The Department of the Navy operates Military Training Routes (MTR) or Military Operating Areas (MOA) that traverse the central parts of the County. The Military Training Routes are comprised of a three dimensional airspace designated for military training and transport activities that have a defined floor (minimum altitude) and ceiling (maximum altitude). The MTR and MOA have been mapped and are available to the public through the County's web-based geographic information system (WebGIS). Potential impacts of new development on military readiness is considered for discretionary projects, and notice is provided pursuant to the Government Code Section 65944(d).

The General Plan and its regulatory context are not static as amendments are made periodically to the governing statutes. Amendments legislated by the State may trigger the need to amend the County's General Plan. Planning staff regularly reviews legislative updates, cataloguing needed changes to the general plan and developing work programs to amend the General Plan in order to ensure ongoing compliance with State law. Outstanding updates to the safety, conservation, and land use elements triggered by the 2019 adoption of the Housing Element and flagged by HCD during their Housing Element certification review are an example. In response to HCD, Planning staff developed work programs and timelines to complete outstanding updates, which are outlined in Table 1 below. These outstanding updates and the associated work programs have been incorporated into the Department's overall work program for Long Range Planning, and progress will be reported in the 2020 General Plan APR even though they are not itemized in Appendix A, the Implementation Action Plan of the Humboldt County General Plan. Planning staff reviewed the GPG and determined that the County's General Plan meets the mandatory requirements described therein with incorporation of the work program contained in Table 1.

2019 General Plan Amendments and Other Major Land Use Accomplishments

This section presents information concerning changes made to the General Plan, other significant land use actions that made progress on implementation, and other priorities for land use decision making established by the Board of Supervisors during 2018 and 2019. It is noted that for much of 2018 there were only three full-time and one part-time Long Range Planning staff. Over the course of the third and fourth quarters of 2018 three additional specialists were added to Long Range Planning staff.

In 2019, the "only" General Plan Amendment approved by the Board of Supervisors was the 2019 Housing Element. The Housing Element was adopted by the Board on August 20, 2019 (Resolution No. 19-84) after an eight-month public engagement effort. On October 23, 2019 the Element was approved by California's Dept. of Housing and Community Development (HCD) as being in full compliance with state Housing Element.

Table 1. Additional General Plan Work Programs

Government Code Section and Summary	County Response to HCD	Work Program	Completion Timeline
<p>65302(d) and (g) Safety and Conservation Elements. The safety and conservation elements must include analysis and policies regarding fire and flood hazard management and be revised upon each housing element revision.</p>	<p>The Board of Supervisors adopted its local hazard mitigation plan ("LHMP") on February 25, 2020. Given the content and regulatory overlap between the LHMP and the safety element and ensure consistency between the two regulatory documents, the County waited to initiate an update to its Safety Element until the updated LHMP was adopted. The LHMP includes assessment of climate change vulnerability, which will be a component of the safety element update.</p>	<p>Commence updating the Safety Element upon adoption of the updated LHMP. Responsible Agency: Long Range Planning Method: General Plan Amendment Cost Range: <\$10,000</p>	<p>By December 31, 2020</p>
<p>65302.10(b): Land Use Element. The land-use element must identify and analyze disadvantaged communities unincorporated island or fringe communities within spheres of influence areas or isolated long-established legacy communities) on, or before, the housing element's adoption due date.</p>	<p>The 2019 Housing Element includes the requisite content of GC § 65302.10(b): Table Z17 of Appendix G of the General Plan (the Housing Element Appendix) identifies the legacy communities located in the unincorporated area, and provides an updated summary of the infrastructure and service needs; Attachment J of Appendix G provides an updated detailed infrastructure analysis of these legacy communities; and Appendix F of the General Plan (the Map Book) includes maps of the unincorporated legacy communities. Policy IS-P26 of the Community Infrastructure and Services Element commits to updating the legacy community analysis with each Housing Element cycle, and H-S5 includes a standard to prioritize infrastructure funding for legacy communities.</p>	<p>Concurrent with the of Safety Element update, the County will also amend the Land Use Element to include a reference to the discussion of Legacy Communities in the Housing Element Appendix (§8.12.23). Responsible Agency: Long Range Planning Method: General Plan Amendment Cost Range: <\$10,000</p>	<p>By December 31, 2020</p>
<p>65302(h): Environmental Justice Element. A jurisdiction must address environmental justice element in its general plan by the adoption of an environmental justice element, or by the integration of environmental justice goals, policies, and objectives into other general plan elements upon the adoption or next revision of two or more elements concurrently on or after January 1, 2018.</p>	<p>Humboldt County does have numerous low-income areas as statutorily defined. The General Plan economic development policies and the 2019 Housing Element both contain measures to better address the needs of this population, e.g., Affirmatively Furthering Fair Housing (H-G7), completing an Assessment of Fair Housing (H-IM25), and stronger measures for tenants and rehabilitation of housing stock (H-IM13, H-IM16, H-IM69, H-IM70). The needed updates of the land use element, safety, and conservation described above trigger the requirement for preparation of an environmental justice element.</p>	<p>Prepare an environmental justice element meeting the statutory requirements, to integrate environmental justice goals, policies, and objectives that are presently contained in other Elements, and incorporate public input. Responsible Agency: Long Range Planning Method: General Plan Amendment Cost Range: <\$10,000</p>	<p>By December 31, 2022. This would follow publication of the 2020 US Census and HUD acceptance for filing of the State of California's Consolidated Plan for the period of 2021-2026 for non-entitlement jurisdictions.</p>

As stated above, the County comprehensively updated its General Plan on October 23, 2017. One of the follow-up actions prescribed by the General Plan was to update the County's Zoning Regulations and associated Zoning Maps (GP-IM6). The General Plan directed the update of the Zoning Regulations and Maps to maintain consistency and to operationalize the General Plan's goals, policies, standards and implementation measures for everyday land use planning. During 2018 Planning staff prepared the amendments to the Zoning Regulations and Zoning Maps pursuant to General Plan. In support of this effort, public workshops on the proposed changes were held throughout the community and with the Planning Commission. This effort resulted in the amendments being ready for action by the Board within the first quarter of 2019, in accordance with the 1 to 2 year timeline. The preparation of the amendments, the public outreach and participation, and hearings continued past the first quarter of 2019 and into the 4th quarter.

In the summer of 2018, the County initiated work on the preparation of a comprehensive region-wide climate action plan, implementation measure E-IM2 in General Plan Chapter 12, ahead of the 2 to 5 year schedule. Also, the County continued development of draft climate adaption policies for areas vulnerable to sea level rise, holding numerous workshops in vulnerable communities and coordinating with Coastal Commission staff. Staff also continued work on implementation measure S-IM12 Probabilistic Tsunami Inundation Mapping. Long Range Planning staff sits and provides input on the California Geologic Survey committee charged with preparation of the probabilistic mapping. Associated with the climate adaptation and tsunami planning efforts is an update of the Humboldt Bay Area Plan. The Humboldt County Office of Emergency Services continued drafting a comprehensive update of the Local Hazard Mitigation Plan, Planning staff has provided input and support of this effort.

The Implementation Action Plan for the General Plan is found in Appendix A of the General Plan, and contains 227 implementation measures.² The following paragraphs describe the progress made on 37 of those measures.

General Plan implementation measures AQ-IM3 and AQ-IM4 call for the creation of a multijurisdictional County-wide Climate Action Plan that mitigates the carbon emissions attributable to the General Plan and addresses emissions from governmental operations. In early 2019, a working group consisting of staff from the County and seven cities began developing the Climate Action Plan. The project team completed greenhouse gas analysis, developed a draft list of mitigation measures and hosted seven public workshops soliciting input on the Climate Action Plan. The plan is on track to be adopted in 2020.

The County also worked on the Industrial Hemp Ordinance and began the Small Farmer Commercial Cannabis Ordinance. For the Industrial Hemp Ordinance effort, it began with a Moratorium approved on 6/25/19 for 6 months to provide time to work on public outreach and ordinance drafting. Three public workshops were held during the summer. Then staff drafted an ordinance based on public feedback and state law, put the draft ordinance up on the website for public review and comment in September. The outcome was an extension of an Industrial Hemp moratorium extension for an additional year, with an alternative selected to examine the CCLUO to determine if there are any regulatory barriers precluding small farmers from entry to the legal marketplace.

The Industrial Hemp Ordinance effort resulted in a new work assignment, drafting a Small Farmer Commercial Cannabis Ordinance or an amendment to the CCLUO. That assignment was initiated

² The 227 count of the General Plan Implementation Measures does not include the implementation measure contained in either the 2014 or 2019 Housing Elements. Nor does the count include the 264 policies and standards noted as "not directly associated with measures" contained in the second table of the Implementation Action Plan for the General Plan.

in December after the moratorium on Industrial Hemp was approved. This will result in a continuation of that work into 2020.

The County also worked on updating the Humboldt Bay Area Plan (HBAP) which has been ongoing in 2019. A major component of the update is the addition sea level rise policies and background information. Other significant components include modification of the tsunami safety background information and policies, and the assessment of the Coastal-Dependent Industrial lands on Humboldt Bay. Additionally, edits are being made to text and mapping throughout the HBAP to update it to be consistent with present circumstances and legal requirements. Four public workshops and two Planning Commission workshops were held in 2019 as part of the HBAP update process. Sea Level Rise Vulnerability Assessments and a Sea Level Rise Adaptation Report were completed for the three at-risk communities on Humboldt Bay (King Salmon, Fields Landing, and Fairhaven/Finntown). Work on this effort is continuing in 2020. HBAP update work has been funded by two LCP grants totaling \$199,346.21. The County was awarded a third grant at the end of 2019 for \$100,000 to explore the potential for regional sea level rise planning for Humboldt Bay as part of the HBAP update process.

Table 2. Details of Other General Plan Implementation Progress

Item	Action
PG-IM1. Documents in Library. The County shall provide a complete set of General Plan documents to each branch of the Humboldt County Library and provide the Library with internet addresses for web pages relating to Humboldt County land use planning. In addition, one loaner copy will be available at the Planning Department for the general public.	Submitted eight copies of the complete General Plan to the Main Library for distribution to Branches
G-P16. Water Service Provider Coordination. Coordinate with water service providers on water supply and demand in their respective areas, and participate in the five-year updates of urban water management plans.	Coordinated with Humboldt CSD, Humboldt Bay Municipal Water District and the Jacoby Creek CWD (City of Arcata) in land use and public facilities planning for the Humboldt Bay Area Plan update
GP-P1. Maintain Community Plans. Periodically update Community Plans to ensure they meet the specific planning needs of individual communities and that demographic, land use, and municipal service information remains current. (also UL-P6, Mixed Use Zoning and UL-P7. Neighborhood and Town Centers, UL-IM1. Neighborhood and Town Centers)	Initiated update to McKinleyville Community Plan through the implementation of the Town Center Ordinance. Public meetings were held on November 13th and December 11.
GP-IM6. Zoning Consistency. Within two years after the adoption of the General Plan Update, revise the Zoning Regulations to re-establish zoning consistency with the policies of the General Plan and amend the Zoning Map to achieve consistency with the General Plan Land Use Map.	Prepared amendments to the Zoning Code to implement the General Plan and prepared draft amendments to the Zoning Map to implement the General Plan. Public meetings were held on January 15th, February 2nd, February 5th, February 6th, February 7th, February 11th, March 7th, March 13th, March 14th, March 21st, April 4th, May 2nd, May 28, May 30th, June 4th, June

Item	Action
	5th, June 11th, June 18th, June 19th, June 25th, July 9th, and August 27th
AG-IM1. Develop Planned Rural Development Program. Update the Zoning Regulations to include provisions for Planned Rural Development (PRD) and implement a program to assist landowners with PRD applications. (Also AG-S4. Planned Rural Development Program Clustering Incentive Options, and FR-P15. Planned Rural Development, FR-S1. Planned Rural Development Program Clustering Incentive Options,	See GP-IM6
AG-IM4. No Net Loss of Prime Agricultural Lands. Provisions for mitigation offsets of prime agricultural land conversion shall be adopted by ordinance.	See GP-IM6
FR-IM5. Develop Ordinance to Regulate Land Uses in TPZ lands. Prepare an ordinance to implement the policies of this Plan for the designation and residential use of lands zoned TPZ. Prior to consideration by the Board of Supervisors, the Ordinance shall be referred to the Forestry Review Committee for review and recommendation to the Board.	See GP-IM6
IS-P1. Coordination with Service Providers. The County shall work cooperatively with cities and service providers to identify needs and service limitations, secure funding, and implement infrastructure and public service projects consistent with this Plan and capital improvement plans.	Continued to work with the Peninsula CSD (Samoa Peninsula FPD) to plan and conduct environmental review for the Samoa Peninsula Wastewater Project. A public hearing on the CEQA document was held on February 26th.
IS-P10. Changes in District Boundaries. Support the adjustment of service district or city boundaries to eliminate service area gaps, align district boundaries with already served areas, consolidate districts, improve service delivery, or to address an existing or impending threat to the public health or safety of the residents of the affected territory, consistent with this Plan. (also IS-P15. Expanded Fire Protection Services)	Continued to work on changes in fire district boundaries to reflect where services are provided as well as to increase fire district revenue to support the sustainable delivery of fire protection services. Public meetings were held on April 9, and November 7th, 8th, and 9th
CO-IM5. Zoning Ordinance Revision for Open Space Consistency Determinations. Revise the Zoning Regulations governing development in open space lands to guide development consistency determinations pursuant to Government Code Section 65567.	See GP-IM6

Item	Action
BR-IM6. Modifications to the Streamside Management Area Ordinance. The County shall modify the SMA Ordinance for consistency with BR-S5 and to allow reductions to SMA widths through ministerial review in consultation with California Department of Fish and Wildlife. The SMA Ordinance shall provide exemptions for minor additions of up to 500 square feet aggregate for buildings or structures existing on April 25, 1995.	See GP-IM6
MR-IM4. Combining Zone. Establish a mineral resources (MR) combining zone to facilitate implementation of the County's regulations for surface mining, conservation, and reclamation. The purpose of the MR combining zone is to ensure compatibility of adjacent uses. The MR combining zone shall be applied to parcels with permitted surface mining operations. Notification shall be provided to parcels within 1000 feet of permitted surface mining extraction sites and along existing haul routes.	See GP-IM6
S-IM16. Airport Safety Review Combining Zone. Amend the Zoning Maps to apply an Airport Safety Review Combining Zone, indicated by "AP", that matches the outer boundaries of the Recommended Compatibility Zones contained in the March 1993 Airport Land Use Compatibility Plan, as amended, for Humboldt County Airports. Until such time as the Zoning Maps are amended, places a note on the record for each parcel in Humboldt County's online permit management system that lies within the outer boundaries of the Recommended Compatibility Zones.	See GP-IM6

5th Cycle Housing Element Implementation

Calendar year 2018 was the final year of the County's 5th cycle Housing Element, and the following is a summary of the 2018 Housing Element APR. As stated above, the County filed its 2018 Housing Element APR by the April 1st statutory deadline. The report was accepted for filing by HCD in May 2019 upon the submittal of corrections requested by HCD. Appendix A contains URLs to the filed Housing Element APR along with excerpts of the report.

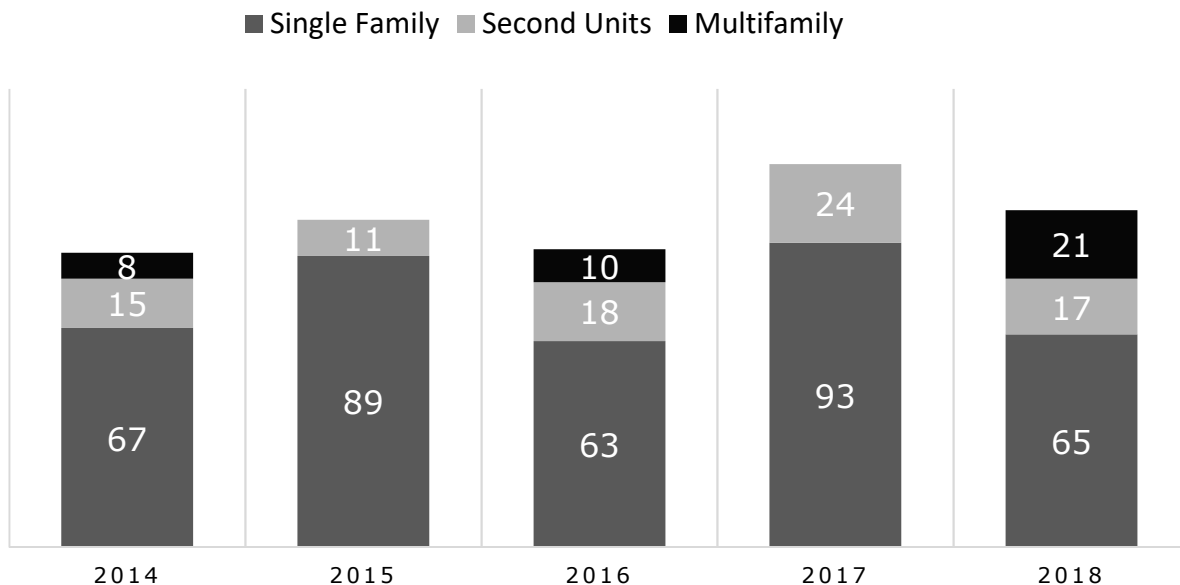
As discussed above, the content of housing element annual progress reports is prescribed by statute with the HCD reviewing the reports to ensure the requirements are satisfied. Substantive

amendments to the content of Housing Element APRs were passed during the 2017 legislative session. Beginning calendar year 2018, reporting requirements for housing became much more detailed. Not only are the number of building permits issued reported, but also the number of units completed. Also, the number building and planning permits applied for and completed, and the number of units approved and disapproved are reported. For all housing units, the APR must estimate the affordability and tenure of each housing unit. Categorizing units as affordable to low or lower income households must be evidence based, e.g., a methodology based on housing costs or supported by recorded affordability covenants, etc.

Permits issued for New Construction

One of the more important implementation measures in the Housing Element is to facilitate the development of new housing. In 2018, 103 new units were permitted for construction. Of these 65 were single family residences, 17 were accessory dwelling units, and the remainder were multifamily units. In 2015 and 2017, no permits were issued for construction of multifamily units. Figure 1 below compares the building permits issued in 2018 with those issued in prior years of the 5th Housing Element cycle. The 2019 permit count is provided separately in to 2019 Housing Element Annual Report. It shows an increase in housing construction in unincorporated areas compared to the 2018 figures, including an increase in multifamily unit construction.

Figure 1. Building Permits Issued 2014 – 2018



Source Humboldt County Planning, 2018

While the data indicates a slight increase in the number overall building permits issued for housing in 2017 and 2018, the County did not meet its projected housing need for the 5th cycle except for housing units affordable to moderate income households. Table 2 below shows the total number of building permits issued during the 5th cycle categorized by the estimated affordability. Building permits for units affordable to extremely low and very low income households saw the greatest shortfall, with only 33 housing units permitted from 2014 to 2018. These 33 units accommodate only 16 percent of the projected need.

Table 3. Comparison of Housing Units Constructed and Projected Housing Needs; Humboldt County Unincorporated Areas, 2014 – 2018

Household Income Category	HOUSING UNITS Unincorporated Areas			
	Projected Housing Needs	Permitted Housing Construction*	Surplus (Deficit)	% of Projected Needs
Extremely Low & Very Low	212	33	(179)	16%
Other Low	135	44	(91)	33%
Moderate	146	226	80	107%
Above Moderate	366	201	(165)	55%
Total	859	504	(435)	58%

* Reported values are for building permits issued.
Source: Humboldt County Planning and Building Department, 2019

Residential Land Inventory

A summary of the residential land inventory of the 2019 Housing Element is shown below in Table 3. Table 3 shows the County had adequate sites in the residential land inventory to accommodate its projected housing needs of 1,413 housing units. This indicates the constraint for housing development has not been a restricted supply of available sites based on zoning, and known environmental constraints associated with the parcels.

Table 4. Residential Land Inventory Summary

Zoning Group	Dev. Acres	Potential Units (Gross)	Parcel Count	Potential Units for the Current RHNA Planning Period (Net)
Rural Residential (RR)	12,715	798	734	747
Rural Residential properties added by the GPU (RA)	5,061	613	162	162
Residential Estates (RE)	897	430	220	305
Residential Low Density (RL)	953	3,232	1,261	2,009
Residential Multifamily (RM)	158	1,438	295	965
Total	14,723	5,898	2,510	4,188

Source: Humboldt County Planning and Building Department, 2019

2018 Methodology for Estimating Affordability of Housing Units

As discussed above, beginning with the 2018 Housing Element APR, jurisdictions must report the income category for each unit. While the County's 2014 Housing Element included survey data regarding the affordability the accessory dwelling and multifamily units (formerly secondary dwelling units), with data collected circa 2006 and 2010, respectively. Given the age of the data, that it was collected prior to and during the Great Recession, and the new statutory reporting requirements, staff employed the below methodologies to estimate and report affordability. The shortcomings of the previous data are also noted below.

Accessory Dwelling Units and Single Family Dwelling Housing Unit Categories. The APR filed March 30, 2019 estimated affordability of ADUs using the 2006 survey data and found on page 8-7 of Chapter 8 of the General Plan, which is based on a 2006 survey, and estimated affordability as 1/3 Low Income, and 2/3 Very Low Income. However, because this survey data is more than 10 years old, and the affordability issues indicated in Humboldt's 6th cycle data package, using the 2006 survey data may result in over-estimating the number of units affordable to low income and very income households.

In response, the submitted Corrected APR employed a methodology based on a comparison of the estimated annual housing costs relative to the cited Health and Safe Code affordability limits. More specifically, Table V of the certified 2014 Housing Element reported the monthly housing costs for a typical 1,500 square foot ("SF") single family residence to be \$2,170, or \$1.45 per square foot, per month. The monthly housing costs of \$1.45 per square foot per month was then used as the factor to estimate annual housing costs based on living space size of the residential units. The estimated annual housing cost was then compared to the housing cost affordability limits specified in Health and Safe Code Sections 50052.5(b) and 50053. To account for the possibility that houses of a smaller size may be occupied by a smaller household, we assumed that houses reported as 1,000 SF or smaller in size would be occupied by a two-person household, and houses reported as greater than 1,000 SF would be occupied by a four-person household. The revised methodology resulted in a number of ADUs previously reported as affordable to low income of very low income are now reported as affordable to moderate income.

Methodology for Estimating Affordability for Housing Units Consisting of 2 or more units. To begin with, none of the reported multifamily units are receiving assistance or are subject to affordability restrictions by deed (Table A2, Columns AL and AM, respectively). The APR filed March 30, 2019 estimated affordability of multifamily units by combining the results of the following:

- A 2010 survey of multifamily permitted between 2007 and 2010 and reported in Section 8.9.1 of the Appendix G of the certified 2014 Housing Element; and
- The affordability breakdown for other income categories as reported in the cited 2014 Housing Element, Table – T 1 (and excerpted below):

Multifamily Units	52 above moderate income
	36 moderate income
	117 low income

Again, the submitted Corrected APR uses a different approach to estimate affordability. Humboldt County staff conducted a survey of rentals listed on Craigslist on May 7, 2019 (Attachment D). Using this survey data, staff compared estimated rents based on the number of bedrooms relative to affordability income limits as per Health and Safe Code Section 50053. As a result, the affordability of most reported multifamily units decreased, and many units moved into the moderate affordability category.

This 2018 General Plan Annual Progress Report was prepared following the County's adoption the 6th cycle Housing Element update in August 2019. The County's adopted Housing Element was then certified by HCD in October 2019. In addition to incorporating public input, the 2019 Housing Element acknowledges that increased housing production cannot be achieved by rezoning alone. The County's 2019 Housing Element includes numerous new housing programs that ease regulatory restrictions, move the County from only occupying a regulatory role to a housing facilitator and partner, mandates the creation of new incentives, etc. Essentially, the 2019 Housing Element recognizes the need to additional measures are needed to increase housing production across the board.

Needed Action

The following paragraphs describe Community Plan policies from before 2002 that were not implemented that have now been incorporated into the 2017 General Plan.

Community Plan Policies Awaiting Implementation

Avenue of the Giants Community Plan

2540.1 The County shall request that the Save-the-Redwoods-League refrain from removing prime agricultural lands from resource production by acquisition.

2540.5 The County shall request that the impacts of increasing State Park land acquisition be addressed in the Park Management Plan and EIR.

Eureka Community Plan

5-2400 HOUSING: The County should revise the zoning ordinance to include the design review recommendations from Chapter 2403.

5-4200 CIRCULATION: After all feasible alternatives have been exhausted, the County shall adopt and periodically review a traffic impact fee ordinance that would require all new development to pay a fair share of transportation improvements.

Garberville/Redway/Benbow/Alderpoint Community Plan

5000 Implementation

1. An outline of river access opportunities and improvements, which would enhance fishing and other recreational uses along the river, should be prepared for the Plan. Standards for access dedications for subdivision of lands with river frontage should be included in the outline.
2. Adopt a parking plan for Garberville.
3. Establish a Parking Authority for the downtown commercial district of Garberville.

McKinleyville Community Plan

2642 Design Review Policies

1. The County initiated planning for the McKinleyville Town Center Ordinance in November 2019 and this Ordinance is expected to be approved in Fall or Winter 2020. For this Ordinance, design review standards shall be adopted for the Town Center area as identified on the Plan's land use maps. A Design Review Committee shall be formed to develop those standards within the Town Center area. No Special Permit shall be required as part of the process.
2. The County shall adopt a Design Review ordinance which establishes clear development standards. The design review standards must be consistent and compatible with the overall principles, objectives and policies of the entire General Plan.

3244 Implementation for Noise Hazards

Standards shall be adopted as part of the County Building Regulations specifying sound insulation requirements which will implement the noise policies of the plan.

4312 Implementation for Trails

A Trails Implementation Plan shall be prepared that includes a trail by trail review with recommendations for how easements could be gained and under what circumstances dedication of easements might be required.