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Subject: City of Fort Bragg Housing Element
Date: Wednesday, November 5, 2025 8:48:27 AM
Attachments: [image002.png](#)
[Parcel Analysis.xlsx](#)

Dear Melissa Vasquez and Melinda Coy,

This email responds to your October 7th letter of inquiry to the City of Fort Bragg regarding compliance with Program H-2.5.8 of the City's 2019 Housing Element.

The City is dedicated to providing a prohousing environment in Fort Bragg and has worked diligently to implement the range of housing laws from the State including adopting new regulations regarding Accessory Dwelling Units, Urban Unit Development, Urban Lot Splits, Emergency Shelters, Group Homes, Low Barrier Navigation Centers, and Supportive Housing. This City has also adopted an ordinance that reduces parking requirements and an ordinance establishing Administrative Design Review for multifamily housing as part of its Prohousing Application.

With regard to implementation of Program H-2.5.8 of the City's 2019 Housing Element, the City would like to open a dialogue with this email by sharing information and asking some questions. Our hope is that we can follow this letter with a quick conference call to develop a strategy that meets HCD's requirements and the City's housing goals.

1. The City of Fort Bragg has already satisfied its 2019 Housing Element Cycle RHNA housing requirements. Our most recent annual progress report indicated only one deficit, namely a 33-unit deficit in the very low-income unit allocation. However, this year the City permitted the following additional multifamily housing projects:
 - Parcel Number 018-440- 58, 1151 S Main Street, an 80-unit multifamily project with 8 units deed restricted to very low-income households and the remainder 72 multifamily units for moderate income households.
 - Parcel number 018-210-29, 860 Hazelwood St, a 49-unit low-income affordable deed restricted senior project.
 - A market rate 4-unit apartment building on South Franklin street.

These new projects have been included for the year 2025 in the table below and have reduced the net deficit to 25 units of housing for very low-income households. As noted in the table below, the City has significantly exceeded RHNA requirements for both low- and moderate-income housing by very wide margins of 300% and 570% respectively.

Income Level		RHNA Allocation by Income Level	2019 - 2024	2025	Total Units to Date (all years)	Total Remaining RHNA by Income Level
Very Low	Deed Restricted	60	27	8	35	25
	Non-Deed Restricted		0	-		
Low	Deed Restricted	31	50	48	101	-
	Non-Deed Restricted		0	-		
Moderate	Deed Restricted	23	6	-	132	-
	Non-Deed Restricted		43	76		
Above Moderate		23	22	5	28	-
Total RHNA		137				
Total Units			148	137	285	25

Question: Given that the City has already more than satisfied all income levels except extremely low/low income, may we reduce the housing inventory sites to only those necessary to satisfy the remaining need of 25 units? We would propose doing this on approximately three sites which have not yet been developed that are already zoned for a density of 24 du/acre maximum, which were identified for lower income housing in Appendix B, and which do not have any known constraints. (APN 008-172-09 [251 S. Franklin Street], APN 018-150-61 [1190 S. Main Street], and APN 018-150-58 [no address].) These three sites could support a total of 104 units by the allowed zoning. As shown on the attached chart, many of the other sites that were listed in Appendix B have either been developed or have biological constraints.

Question: Would it be necessary to revise Appendix B of the Housing Element, or may we just include findings in an Ordinance that this would satisfy the remaining RHNA?

2. In the 2014 and 2009 Housing Element cycles the City included many more parcels in the vacant parcel inventory than was required for the RHNA allocation for each of those Housing Elements.
 - In 2009 the City included sufficient land to accommodate a maximum of 2,869 units and 1,618 likely units, while the RHNA allocation only required land for **256** units. In other words, the City included sufficient parcels in its inventory to provide housing for 6 times its RHNA requirement in the 2009 Housing Element.
 - In 2014 the City included sufficient land to accommodate a maximum of 2,396 units and 1,595 likely units while the RHNA only required land for **20** units. The City included sufficient parcels in its inventory to provide housing for 79 times its RHNA requirement in the 2014 Housing Element.

The City was trying to conscientiously illustrate that it easily met RHNA requirements. The City did not know that the consequence of identifying all potential vacant land would eventually result in a requirement to make multifamily projects permissible by right on these parcels. Additionally, many of the parcels identified in the land inventory are not suitable for low-income multifamily units as described below. Is it possible for the City to amend our vacant parcel inventory to address the issues described below?

Six parcels are constrained by sensitive biological resources. If these parcels are included in a rezoning effort, The CEQA analysis for the rezone would remove them from the rezoning because it is not possible to develop these parcels without having a significant effect on rare plants, wetlands and coastal bluffs. The vacant land inventories of 2009, 2014 and 2019 indicated that these parcels include biological constraints. However, since that time the extent of the biological constraints has been further documented and three of the parcels are undevelopable, while the remaining would require a CEQA analysis to set buffers and mitigation measures for development. Consequently, all six parcels would be excluded as a mitigation measure of the CEQA analysis to adopt the required zoning overlay. In the attached table, these parcels are noted with orange highlight.

Question: Can these parcels be removed from the Vacant Land Inventory and be excluded from the implementation of Program H-2.5.8 since they are not developable and not required to meet the City's RHNA requirements?

- Six of the parcels have already been developed or have been fully entitled for multifamily development.

Question: Can these six parcels be excluded from the implementation of Program H-2.5.8 since they are already developed and have already been utilized to meet the City's RHNA allocation? These parcels are highlighted in green on the attached table.

3. Can you confirm that Program H-2.5.8 does not require the City to allow by-right development on the parcels which were identified for moderate income housing with densities of less than 15 du/acre? The City has four parcels totaling 7.3 acres that are developable and which currently allow less than 15 units per acre. These parcels are small (average of 1.3 acres), which makes them unlikely candidates for multifamily development.

Please see the attached tables and thanks for your consideration of these questions. We look forward to hearing from you and setting up a meeting to discuss this further. Please call me at 707-357-6480 to set up a meeting or to answer any questions.

Sincerely,

Marie Jones
Consulting Planner
City of Fort Bragg
707-357-6480