



CITY COUNCIL STAFF REPORT

TO: City Council

DATE: April 13, 2026

DEPARTMENT: Community Development Department

PREPARED BY: MJC

PRESENTER: Marie Jones

AGENDA TITLE: Receive Report, Conduct Public Hearing, and Consider Adoption of a Resolution of the Fort Bragg City Council to Amend the Fort Bragg Inland General Plan by Adopting the 2019 Housing Element Amendment (GPA 1-26)

RECOMMENDED ACTION

Adopt a Resolution of the Fort Bragg City Council to Amend the Fort Bragg Inland General Plan by Adopting the 2019 Housing Element Amendment (GPA 1-26).

BACKGROUND

The City of Fort Bragg adopted its current General Plan in December 2002. In 2009, 2014 and 2019 the City updated the Housing Element of the General Plan in compliance with California state law. An up-to-date Housing Element is necessary for the City to retain its eligibility for CDBG and HCD funding. The 2019 Housing Element is the blueprint for City actions with regard to housing through 2027. A new Housing Element will need to be prepared in 2026 to address new State requirements and a larger RHNA (Regional Housing Needs Assessment) allocation.

The City received a letter from HCD on October 7th, 2025 notifying the City that it was out of compliance with State Housing law because of the City's failure to implement program H-2.5.8. HCD noted that unless the City comes into compliance with Program H-2.5.8, HCD could revoke its finding the City's Housing Element is in substantial compliance with State housing law (Attachment 2). MJC communicated with HCD about this issue and HCD agreed that the City could amend its Housing Element to revise the Vacant Land Inventory so that it meets the outstanding RHNA goals for the City.

The Housing Element amendment would allow the City to retain its Housing Element certification, allow the City to continue to be eligible for CDBG funding for various City and community programs, and achieve the Pro-Housing Designation.

AGENDA ITEM NO. 7A

It should be noted that the 2019 Housing Element was never submitted to the Coastal Commission for certification. Therefore an additional item will be brought forward to submit the 2019 Housing Element with the amendment incorporated for Coastal Commission certification.

ANALYSIS & DISCUSSION

As shown in Table below, the City’s share of the regional housing need allocation in 2019 was 137 units. The City was responsible for identifying the land that is both suitable for and can accommodate this level of residential development, which it did in the 2019 Housing Element.

Table 1: Fort Bragg Regional Housing Needs Assessment Allocation by Income Group						
Income	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
Housing Units	30	30	31	23	23	137
Source: MCOG, Mendocino County Regional Housing Needs Assessment Plan, 2018						

Indeed, the City identified many more parcels than required to achieve its RHNA. 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.

Additionally, since the Housing Element was adopted in 2019, the City has approved sufficient multifamily housing projects to satisfy most of the City’s 2019 Housing Element Cycle RHNA housing requirements as illustrated in Table 2 below. The City has significantly exceeded RHNA requirements for both low- and moderate-income housing by very wide margins of 300% and 570% respectively. There is only one deficit remaining, namely a 25-unit deficit in the very low-income unit allocation.

Table 2: RHNA Achievement, City of Fort Bragg 2019-2025

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

Most recently, in 2025, the City permitted these specific 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.

HCD can require the City to rezone all of the parcels identified in our 2019 Vacant Property Inventory to allow multifamily housing development by right without a Use Permit per Housing Element program H.2.5.8 below, even though the City identified significantly more parcels for multifamily housing than required by the RHNA. At the time that the City prepared the Housing Element and identified these parcels it was not clear that the City would be required to rezone these parcels.

Program H-2.5.8. Maximize Housing Density by Right for projects with 20%+ Affordable Units. Revise the Land Use and Development Code to allow the maximum density permissible within a zoning district by right (no Use Permit) for all residential projects that include at least 20% of units deed restricted at rents affordable to low income households and that have been listed in the last two Housing Elements as an eligible site in the Vacant Parcel Inventory for the RHNA, these parcels are listed on the Vacant Parcel Inventory and include: 008 172-09, 251 So Franklin St; 018-440 58, 1151 So Main St; 018-150-61, 1190 So Main St; 018-090-02, 700 River Dr.; 018-090-16, 700 River Dr.; 008-010-31, 1020 Glass Beach Dr.; 018-113-03, 970 Chestnut St; 008-010-33, 1080 Glass Beach Dr.; 008-290-73, 1329Cedar St; 008-302-28, 1328 Cedar St; 008-290-34, 1325 Cedar St; 018 100-42, 485 So Lincoln St; 018-210-29, 860 Hazelwood St; 020-520-22, 1600 Oak St; 018-440-50, 200 We Ocean View Dr.; 018-113-01, 552

S Lincoln St; 018-440-38, 350 Ocean View Dr.; 018-440-49, 250 We Ocean View Dr.; 018-340-04, 441 South St; 018-340-03, 601 Cypress St; 008-350-60, 920 Stewart St; 018-150-58, No Street Address; 018-150-56, No Street Address; 018-150-55, 100 East Ocean View Dr.

Responsibility: Community Development

Department Financing: General Plan

Maintenance Fee Fund Scheduling:

2020-2021

Quantification: 20 units

Furthermore, the City Council and community have expressed concerns about allowing multifamily housing by right on so many parcels.

Therefore, MJC worked with HCD to develop a mutually agreeable solution, to amend the City's Housing Element to identify a smaller subset of parcels for the Vacant Parcel Inventory to meet the remaining 33-unit requirement of the RHNA allocation. MJC has selected four potential parcels for the Vacant Parcel Inventory as illustrated below.

City of Fort Bragg - PARCEL-SPECIFIC INVENTORY OF VACANT AND UNDERUTILIZED LANDS															
APN	Address	General Plan Designation	Zoning	Units/ Acre	Total Acres	Allowable Units	ADUs	Density Bonus (50%)	Max Density w ADUs & Density Bonus	Coastal	Environmental Review	Existing Use	Target Income Category	Listed in 2014 and 2009 Housing	Development Constraints
008-172-09	251 S. Franklin St.	CG	CG	24	1.06	25	2	14	41	Yes	Infill	Vacant	Low	Yes	None
018-150-58	180 Boatyard Dr	RVH	RVH	24	1.32	32	2	17	51	Yes	Infill	Vacant	Low	Yes	None
018-150-55	100 E Ocean View Dr.	RVH	RVH	24	0.69	17	2	9	28	Yes	Infill	Vacant	Mod	Yes	None
018-113-03	970 Chestnut St.	RH	RH	15	2.14	32	2	17	34	No	Infill	Vacant	Low	Yes	None
Total					5.21	106			154						

These parcels were selected because they: 1) are on parcels without environmental constraints; 2) re infill sites; 3) offer higher density for multifamily development; and 4) are located in areas appropriate for multifamily housing.

However, Planning Commission may recommend, and City Council may select, other vacant parcels in lieu of the above selected parcels. To see the Complete 2019 Vacant Parcel Inventory see Attachment 4. All properties that are highlighted in green on the vacant parcel inventory have been permitted for housing development or have been developed. All parcels that are Yellow have environmental constraints and should not be included in a new Vacant Land Inventory. Other potential addresses which could be substituted or included are as follows:

- 200, 250 and 350 West Ocean Drive.
- 552 S Lincoln.
- 485 S Lincoln.

Please see the City Council's resolution of adoption (Attachment 1) for the complete housing element amendment language. All changes are illustrated in red text and red text strikeout.

ENVIRONMENTAL ANALYSIS

The project is exempt from CEQA under Section 15061.b.3 the Commonsense exemption.

- The proposed Housing Element amendment allows the City to comply with state law.
- These regulations qualify for the Commonsense Exemption because the parcel located in the Inland Zone is already exempt from compliance with CEQA as it qualifies for the in-fill categorical exemption.

COMMUNITY OUTREACH

Both the City Council and the Planning Commission met in May and June of 2025 and discussed the merits of this proposal at that time and decided not to proceed with the implementation of Program H-2.5.8. The Planning Commission held a public hearing and made a recommend to proceed with the item at their February 25, 2026 meeting.

ALERNATIVES

The City could either decide not to adopt the required amendment and thereby lose the State certification of the City's Housing Element or decide to comply with Program H-2.5.8 as current written. City Council and the Planning Commission have already expressed an unwillingness to comply with Program H-2.5.8 as current written.

If the City does not amend the Housing Element or implement Program 2.5.8 as currently written the City will lose its Housing Element certification. Municipalities which do not have certified Housing Elements are required to approve all multifamily housing projects by right, regardless of Use Permit requirements, location, level of affordability, and/or if they are proposed for a vacant or already developed lot. This would result in more multifamily housing projects being exempt from local permit authority.

CONSISTENCY

The proposed amendments are consistent with State law, the City's General Plans and Zoning Ordinances. The amendments revises a mandatory program of the City's Housing Element per direction provided by HCD.

ATTACHMENTS

1. Resolution of the Fort Bragg City Council Amending the Fort Bragg Inland General Plan by Adopting An Amendment to the 2019 Housing Element (GPA 1-26)
2. HCD's October 7, 2025, Comment Letter
3. City's Response to HCD Comment Letter
4. 2019 Housing Element Vacant Parcel Inventory
5. PC 4-2026 Resolution Recommending Approval of Housing Element Amendment
6. NOPH

NOTIFICATION

1. "Notify Me"
2. Property owners of the following parcels:
 - 251 So Franklin St.
 - 180 Boatyard Dr.
 - 100 East Ocean View Dr.
 - 970 Chestnut St.
 - 200, 250 and 350 West Ocean Drive.
 - 552 S Lincoln.
 - 485 S Lincoln.