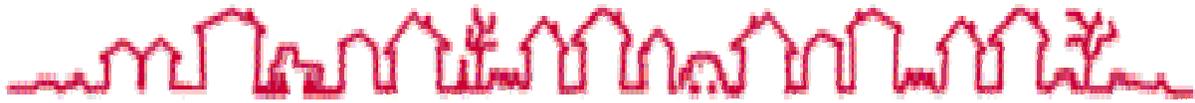


STATE OF CALIFORNIA

Department of Housing and
Community Development



City of Ferndale Housing Element:

June, 2006

TABLE OF CONTENTS

Page Number

Chapter One: Introduction

Purpose of the Element	5
Public Participation.....	5
Consistency with the General Plan	6

Chapter Two: Housing Needs

Population	7
Employment.....	9
Household Characteristics	
▫ Household Growth and Tenure Trends	11
▫ Special Housing Needs.....	12
▫ Overcrowded Households	16
▫ Households Overpaying	16
Housing Stock Characteristics	
▫ Housing Units by Type.....	17
▫ Construction Trends	19
▫ Housing Stock Conditions.....	20

Chapter Three: Resources and Constraints

Locality Share of the Regional Housing Need	23
Land Inventory.....	25
▫ Identification of Available Land and Sites by Zoning District and Realistic Capacity	25
▫ Analysis of Suitability (Physical and Environmental)	28
▫ Analysis of Zoning that Facilitates Development by Income Group.....	28
▫ Availability of Infrastructure.....	29
▫ Analysis of Redevelopable Sites	29
▫ Analysis of Zoning that Facilitates Transitional Housing, Emergency Shelters and Housing for Farmworkers	29
▫ Analysis of Realistic Capacity.....	29
Analysis of Governmental Constraints	31
▫ Land Use Controls.....	31
▫ Codes and Enforcement.....	33
▫ On/Off-site Improvement Standards	33
▫ Fees and Exactions	34
▫ Processing and Permit Procedures.....	34
▫ Constraints on Persons with Disabilities	39

Analysis of Non-Governmental Constraints.....	41
Units At-Risk of Converting to Market Rate Uses.....	42
Energy Conservation.....	42

Chapter Four: Review and Revise

Program by Program Review of the Previous Housing Program with progress, effectiveness and appropriateness	43
--	----

Chapter Five: Summary of Conclusions

Housing Needs Summary	51
-----------------------------	----

Chapter Six: Housing Program

Goals and Policies.....	54
Implementation Programs.....	54
Financial Resources	58
Quantified Objectives	61

Attachments:

- Attachment A – City of Ferndale Zoning Map
- Attachment B – Improvement Standards and Specifications
- Initial Study for the Housing Element
- Notice of Public Hearing and Intent to Adopt a Negative Declaration

LIST OF TABLES

Table	Table Title	Page
1	Population Growth Trends 1970 – 2003 – City of Ferndale	7
2	Ethnic Makeup – Ferndale and Humboldt County	8
3	Makeup by Sex and Age – Ferndale, Humboldt County, California	8
4	Male to Female Ratios – Ferndale	9
5	Employment by Industry – Ferndale	9
6	Household Income – Ferndale, Humboldt County, California	10
7	Unemployment Levels in Humboldt County	11
8	Household Growth Trends (1980 – 2003) – Ferndale	12
9	Households by Tenure (1980 – 2000) – Ferndale	12
10	Householders by Tenure by Age (2000) – Ferndale	12
11	Persons with Disability by Employment Status (2000) – Ferndale	13
12	Persons with Disabilities by Disability Type (2000) – Ferndale	14
13	Household Size by Tenure (2000) – Ferndale	14
14	Number of Farmworkers (1997) – Humboldt County	15
15	Farmworkers by Days Worked (1997) – Humboldt County	15
16	Female Headed Households (2000) – Ferndale	16
17	Overcrowded Households (2000) – Ferndale	16
18	Households Overpaying (2000) – Ferndale	17
19	Housing Units by Type (1990 – 2000) – Ferndale	17
20	City/County Population and Housing Estimates, 2004	18
21	Owners to Renters Ratios – by City in Humboldt County	18
22	Median Area Sales Prices – Ferndale	19
23	Housing Permits Issued – Ferndale	19
24	Type of Housing – Ferndale	20
25	Ages of Housing – Ferndale	20
26	Housing Conditions – Ferndale	21
27A	Regional Housing Needs (2001-2008) – Ferndale	23
27B	Progress toward the Regional Housing Need (2001-2005)	24
28	Vacant Land Summary by Zone – Ferndale	25
29	Vacant Land Inventory by Parcel Number – Ferndale	26
30	Zoning Land Use Descriptions – Ferndale	32
31	Development Standards – Ferndale	33
32	Planning and Development Fees – Ferndale	34
33	Timelines for Permit Procedures – Ferndale	38
34	Housing Types Permitted by Zoning District – Ferndale	39
35	Persons with Disabilities by Type and Age – Ferndale	40
36	Summary of Conclusions	51
37	Housing Programs	54

Chapter One: Introduction

Purpose of the Element

Recognizing the importance of providing adequate housing in all communities, the State of California has mandated a Housing Element, one of seven required, within every General Plan. The rules regarding housing elements are stated in California Government Code §§ 65580-65589. The statewide goal is given as “decent housing and a suitable living environment for every California family.”

The primary purpose of the Housing Element is to:

- Preserve and improve housing and neighborhoods,
- Provide adequate housing sites,
- Assist in the provision of affordable housing,
- Remove governmental constraints to housing investment, and
- Promote fair and equal housing opportunities.

Further, State Housing Element law requires “An assessment of housing needs and an inventory of resources and constraints relevant to the meeting of these needs.” The law requires:

- An analysis of population and employment trends
- An analysis of the City’s fair share of the regional housing needs
- An analysis of household characteristics
- An inventory of suitable land for residential development
- An analysis of the governmental and non-governmental constraints on the improvement, maintenance and development of housing.

The City of Ferndale last prepared a Housing Element in 1992. However, the draft document was never adopted by the City Council. The most recent formally adopted Housing Element for the City of Ferndale dates from 1989.

The updated Housing Element presented here includes some of the information from earlier documents, but has been largely rewritten to incorporate updated state guidance and more recent census data.

Public Participation

The current update of the Housing Element began in the summer of 2002 with a series of meetings between Planning Commission representatives and City staff, with the intent of identifying requirements and beginning to compile relevant information. In March 2003 a committee was formed to review all General Plan update requirements, and to develop a timeline and assign tasks related to document review and update. The committee included the City Planner, the City Manager, a City Council member, a Planning Commission member, a representative from the Chamber of Commerce and several interested citizens.

The City Planner conducted a housing condition survey over a period of several months at the end of 2004 and the beginning of 2005.

A notice will be sent to service providers, for profit builders and non-profit builders that the Draft Housing Element is available on-line, at City Hall, and at our local Library.

As a means to make a diligent effort to obtain interest in the Housing Element, prior to the Planning Commission public hearing on this matter, a news release will be provided to the local newspaper summarizing key matters in the housing element, inviting the public to review the Draft and attend the public hearing. The Planning Commission will forward their comments and recommendations to the City Council, who will hold an additional hearing prior to adoption. Both the Planning Commission and City Council hearings will be advertised in the local newspaper, as well as on our Online News Page, inviting the public to review the Draft Housing Element and attend the hearings. The document will be made available at City Hall and the local library.

Consistency with the General Plan

The goals and policies of all general plan elements must be internally consistent. At this time, there are no apparent inconsistencies; however, the general plan is ready to be updated to the City will be pursuing a much more detailed analysis and updates. Many of the other elements of Ferndale's existing General Plan are quite antiquated. The Ferndale Housing Element is the first step in a complete review and revision of all General Plan elements by the City of Ferndale. The Housing Element will address all State requirements, including relevant legislation enacted subsequent to adoption of the previous element. It contains information on housing constraints and actions to deal with constraints.

The Housing Element includes information on the number of units required to meet Ferndale's housing needs and its share of the regional need. Sites with development potential in accordance with the City's housing needs are evaluated. The revised Housing Element, along with the adopted elements of the General Plan will act as a guide for municipal decisions which effect the quality and quantity of housing; and maintain Ferndale's present quality of life by balancing the availability of housing with other environmental considerations.

Chapter Two: Housing Needs

Population

Introduction

Ferndale is located in Humboldt County, about fifteen miles south of Eureka, approximately five miles west of U.S. Route 101, in the rural dairy area of the Eel River delta. This small community has traditionally had an agricultural-based economy that has transitioned to also include a very successful tourist economy. Specifically, the main industries in Ferndale are dairy farming, cattle ranching, tourism, lumber and wood products, and service. Ferndale is known for its architecturally stunning bed and breakfasts as well as the beautiful Victorian charm of antique shops, art galleries, museum and houses. These assets, as well as the surrounding beautiful country pasture, ocean views, and sweeping mountainsides all help to attract tourists from around the world. (Source: *Ferndale Community Report*; Dr. Sheila L. Sheshan, Assistant Professor, Department of Sociology; Humboldt State University, June 2002)

Population Growth Trends

The City of Ferndale has grown slowly and steadily over the past half century. Ferndale's population grew by 25.8 percent between 1950 and 2000, with much of that growth occurring during the late 1960's. Another burst of growth has taken place in the past two years.

Table 1: Population Growth Trends (1970 - 2003) – City of Ferndale

Year	Population	Numerical Change	Average Annual Change	
			Number	Percent
1970	1,352			
1980	1,367	15	1.5	0.1%
1990	1,331	-36	-3.6	-0.3%
2000	1,421	90	9	0.7%
2004	1,394	-27	-2.7	-0.2%

Source: Census Bureau (2000 Census, SF3: P1) and (1990 Census, STF3: P001), DOF (Report E-5)

Because of the city's constriction into one square mile of city limits and the city's remote location of six miles off the Highway 101 corridor, Ferndale's growth over the 50-year period lagged behind that of Humboldt County, which grew by 45.3 percent. County growth rates have been consistently higher over the past three decades.

Ethnic Composition

Ferndale's population is overwhelmingly white (96.1 percent) according to the 2000 U.S. Census. In recent history, Swiss Italians owned many of the dairies surrounding Ferndale, and hired Portuguese workers. Eventually, the Portuguese purchased the dairies, and hired Hispanic workers. Currently, the Hispanic population is increasing. A diverse array of other races and ethnicities reside in Ferndale, although in very low numbers.

Table 2: Ethnic Makeup – Ferndale and Humboldt County

Ethnicity	Ferndale		Humboldt County	
	Population	Percent	Population	Percent
Total Population	1,382	100.0%	126,518	100.0%
One Race	1,328	96.1%	120,962	95.6%
White	1,290	93.3%	107,179	84.7%
Black or African American	4	0.3%	1,111	0.9%
American Indian and Alaska Native	7	0.5%	7,241	5.7%
Asian	8	0.6%	2,091	1.7%
Native Hawaiian or Pacific Islander	1	0.1%	241	0.2%
Two or more races	54	3.9%	5,556	4.4%
Hispanic or Latino (of any race)	59	4.3%	8,210	6.5%

Humboldt County is also predominantly white, although numbers of most other races or ethnic groups are somewhat higher. The City of Ferndale should make available fair housing information in various places throughout the city in order to promote equal opportunity for all persons regardless of race, religion, sex, marital status, ancestry, national origin color, familial status or disability.

Sex and Age

Ferndale is perceived as an attractive location for retirees, both of local origin and from larger metropolitan areas. Indeed, a review of the data indicated that for all age groups below 44 years of age, Ferndale percentages run below state figures. Over age 45, the situation reverses; in those categories Ferndale consistently has a higher percentage of residents than the state as a whole. This is generally true of comparison between Ferndale and Humboldt County as well, although the trend is not as strong. While many factors could contribute to the age distribution, high housing costs (by regional standards) could certainly be a contributing factor. Younger families might be less able to afford to live in Ferndale.

Table 3: Sex and Age of Population – Ferndale, Humboldt County, California

Sex & Age	Ferndale		Humboldt County		California	
	Population	Percent	Population	Percent	Population	Percent
Male	641	46.4	62,532	49.4	16,874,892	49.8
Female	741	53.6	63,986	50.6	16,996,756	50.2
Under 5 years	79	5.7	7,125	5.6	2,486,981	7.3
5 to 9 years	81	5.9	7,899	6.2	2,725,880	8.0
10 to 14 years	93	6.7	8,817	7.0	2,570,822	7.6
15 to 19 years	84	6.1	10,025	7.9	2,450,888	7.2
20 to 24 years	73	5.3	11,209	8.9	2,381,288	7.0
25 to 34 years	142	10.3	16,016	12.7	5,229,062	15.4
35 to 44 years	192	13.9	18,679	14.8	5,485,341	16.2
45 to 54 years	223	16.1	19,861	15.7	4,331,635	12.8
55 to 59 years	103	7.5	6,313	5.0	1,467,252	4.3
60 to 64 years	82	5.9	4,798	3.8	1,146,841	3.4
65 to 74 years	123	8.9	8,020	6.3	1,887,823	5.6
75 to 84 years	86	6.2	5,754	4.5	1,282,178	3.8
85 years or older	21	1.5	2,002	1.6	425,657	1.3
Under 20		24.4		26.7		30.1
20-44 years		29.5		36.4		38.6
45-64 years		29.5		24.5		20.5
65 and older		16.6		12.4		10.7

Although Ferndale has an older population than the state or county, the disparity is not as great as many believe. The majority of Ferndale’s population (53.9 percent) is under 45 years of age, and only 16.6 percent are over 65.

Table 4: Male to Female Ratios – Ferndale

SEX and Age	Number			Percent			Males per 100 females
	Both sexes	Male	Female	Both sexes	Male	Female	
Total population	1,382	641	741	100.0	100.0	100.0	86.5
50 to 54 years	111	51	60	8.0	8.0	8.1	85.0
55 to 59 years	103	48	55	7.5	7.5	7.4	87.3
60 to 64 years	82	43	39	5.9	6.7	5.3	110.3
65 to 69 years	64	29	35	4.6	4.5	4.7	82.9
70 to 74 years	59	21	38	4.3	3.3	5.1	55.3
75 to 79 years	50	20	30	3.6	3.1	4.0	66.7
80 to 84 years	36	14	22	2.6	2.2	3.0	63.6
85 to 89 years	14	2	12	1.0	0.3	1.6	16.7
90 years and over	7	0	7	0.5	0.0	0.9	0.0

According to Ferndale Census figures, females outnumber males in almost all age categories with an overall of 53.6 percent females to 46.4 percent males. This follows the trend in Humboldt County, with 50.6 percent female, 49.4 percent males, and California, with 50.2 percent females to 49.8 percent males.

Employment

Employment by Industry

The economy of Ferndale has become more diversified in recent years. Many residents work in a variety of jobs in Eureka or other regional business centers. In Humboldt County, government is now the largest employer. The health service industry is a major employer, as is retail trade. The logging industry continues to play an important but declining role, with the number of logging-related jobs declining substantially in recent years.

Table 5: Employment by Industry (2000) – City of Ferndale

Industry Type	2000	
	Number	Percent
Agriculture, forestry, fishing and hunting, and mining:	39	5.9%
Construction	37	5.6%
Manufacturing	58	8.8%
Wholesale trade	16	2.4%
Retail trade	87	13.2%
Transportation and warehousing, and utilities:	33	5.0%
Information	24	3.6%
Finance, insurance, real estate and rental and leasing:	27	4.1%
Professional, scientific, management, admin.	49	7.4%
Educational, health and social services:	137	20.8%
Arts, entertainment, recreation, and services:	61	9.3%

Other services	39	5.9%
Public administration	52	7.9%
TOTAL	659	100.0%
Source: Census Bureau (2000 Census, SF3: P49)		

Ferndale is a tourist center, with businesses on Main Street and several bed and breakfasts serving those drawn by historic architecture or by a variety of regional attractions. Ferndale also serves the needs of the surrounding dairy community. Technology dependent activities including consulting, design, and computer support are a growing segment of the local economy.

Income

A review of U.S. census data on household income shows that relative to Humboldt County or the State of California, fewer Ferndale residents fall within the two lowest income categories. A total of 11.2 percent of Ferndale households reported less than \$15,000 of income in 1999, compared with 23.7 percent of Humboldt County households, and 14.0 percent of all California households.

At higher income levels, differences again become apparent. At \$50,000 to \$75,000 Ferndale and statewide percentages are similar, at 20.3 and 19.1 percent, respectively. Only 15.9 percent of county households reported the same level of income.

In the four highest brackets, the disparity widens. In Ferndale, 15.7 percent of households reported 1999 income greater than \$75,000, compared with 12.6 percent in Humboldt County, and 28.8 percent statewide. The higher state allocation presumably reflects the concentration of professional and top management jobs in major urban centers, as well as the higher cost of living there.

Table 6: Household Income: Ferndale, Humboldt County, California

Household Income, 1999 (Source: U.S. Census Bureau)	Ferndale		Humboldt County		California	
	No.	Percent	No.	Percent	No.	Percent
Households	630	100	51,235	100	11,512,020	100
Less than \$10,000	37	5.9	7,059	13.8	967,089	8.4
\$10,000-14,999	46	5.3	5,057	9.9	648,780	5.6
\$15,000-24,999	102	16.2	8,803	17.2	1,318,246	11.5
\$25,000-34,999	100	15.9	7,300	14.2	1,315,085	11.4
\$35,000-49,999	118	18.7	8,411	16.4	1,745,961	15.2
\$50,000-74,999	128	20.3	8,138	15.9	2,202,873	19.1
\$75,000-99,999	53	8.4	3,485	6.8	1,326,569	11.5
\$100,000-149,999	24	3.8	1,911	3.7	1,192,618	10.4
\$150,000-199,999	13	2.1	471	0.9	385,248	3.3
Greater than \$200,000	9	1.4	600	1.2	409,551	3.6
Median Household Income	37,955		31,226		47,493	
Median Family Income	49,706		39,370		53,025	

Employment/Unemployment

California Employment Development Department (EDD) data indicates there were 610 residents of the City of Ferndale in the labor force in July 2004. The reported unemployment rate in July 2004 for the City of Ferndale was 2.3 percent, compared to an overall County unemployment rate of 6.3 percent.

The City of Ferndale has relatively few major employers, as most businesses on Main Street are owner operated. The Elementary and High Schools employ 65 permanent and 30 seasonal employees; Del Biaggio Construction employs 35 full time people; Valley Grocery has four full time, nine part time; City Government seven full time, five part time; Nilsen Feed seven full time, six part time; Valley Lumber nine full time; and the two banks employ four full time and six part time. Of course, some of these employees come from outside the city limits of Ferndale. Ferndale has one of the lowest unemployment rates in Humboldt County at 2.3 percent.

Table 7: Unemployment Levels in Humboldt County

Area Name	Labor Force	Employment	Unemployment	Rate	Census Ratios	
					Employment	Unemployment
Humboldt County	59,700	55,900	3,800	6.3%	1.000000	1.000000
Arcata	8,140	7,570	570	7.0%	0.135370	0.150722
Blue Lake	670	640	30	4.8%	0.011410	0.008583
Eureka	13,180	12,340	840	6.5%	0.220731	0.223153
Ferndale	610	600	10	2.3%	0.010682	0.003768
Fortuna	4,050	3,840	210	5.2%	0.068659	0.055474
McKinleyville	5,370	5,100	270	5.0%	0.091204	0.070756
Rio Dell	1,200	1,040	160	13.6%	0.018650	0.043333
Willow Creek	720	630	90	12.3%	0.011292	0.023446

County Data are for July (Preliminary) 2004

Household Characteristics

Household Growth and Tenure Trends

The Census Bureau identified 623 households in 2004. A walking survey done by Ferndale’s City Planner in 2004 and early 2005 identified 892 households, which includes secondary dwelling units, apartments, studio apartments, duplexes, triplexes, single dwelling units, etc.

The percentage of people living in their own homes is 64.8 percent; renters comprise 35.2 percent of the total dwellings. There are 45 properties that include two dwellings; 495 single-family dwellings; 13 Triplexes; five 4-plexes; and two apartment buildings with 6 apartments each.

The proportion of renters to owners today is approximately what it was in the 1980’s. During the 1990’s twenty-one minor subdivisions with at least 2 parcels each were approved, along with one major subdivision of 22 lots. During the 1990’s, 40 Single Family Residences were built, five secondary dwelling units, four duplexes (8 dwellings) and nine apartments. Currently, there are two large (for Ferndale) subdivisions in the planning stages. One will offer 33 single-family parcels, the other eight additional single-family parcels. Both of these subdivisions will allow secondary-dwelling unit development, should the owners desire. As the above information shows, most new construction involves single-family dwellings, with few apartments, secondary dwelling units and duplexes being constructed.

Table 8: Household Growth Trends (1980 - 2003) - City of Ferndale

Year	Households	Numerical Change	Annual Numerical Change
1980	541		
1990	566	25	2.5
2000	619	53	5.3
2004	623	4	1

Source: Census Bureau (2000 Census, SF3: H6), (1990 Census, STF3: H004) and DOF (E-5 Report)

Table 9: Households by Tenure (1980 – 2000) - City of Ferndale

	1980		1990		2000	
	Number	Percent	Number	Percent	Number	Percent
Owner	353	65.2%	352	62.2%	401	64.8%
Renter	188	34.8%	214	37.8%	218	35.2%
TOTAL	541	100.0%	566	100.0%	619	100.0%

Source: Census Bureau (2000 Census, SF 3: H7), (1990 Census, STF 3: H008) and 1980 Census

Special Housing Needs

In addition to overall housing needs, cities and counties must plan for the special housing needs of certain groups. Government Code (§65584(a)(6)) requires that several populations with special needs be addressed – homeless people, seniors, people with disabilities, large families, female-headed households, and farmworker households. The Housing Element should take into account any local factors that create an extraordinary need for housing, and should quantify those needs as best as possible.

Seniors

In 1980, there were 11,103 persons aged 65 and over living in Humboldt County. This was 10.2 percent of the total population. By 1990, 12 percent of the total population was estimated by the Census to be 65 years or older (14,631 persons). The Census 2000 indicates that the senior population had risen to 13 percent of the total population in Humboldt County.

According to the 2000 Census, 185 elderly households reside in Ferndale, which is 29.9 percent of the total households. Of the 185 senior households, only 28 were renters, which indicate a strong ownership trend amongst seniors. Further, only nine of the 100 total households under the poverty level were over the age of 65. Seniors in Ferndale make up 16.6 percent of the population, higher than the Humboldt County percentage.

Table 10: Householders by Tenure by Age (2000) - City of Ferndale

Householder Age	Owners	Renters	Total
15-24 years	4	38	42
25-34 years	22	59	81
35-64 years	218	93	311
65-74 years	75	12	87
75 plus years	82	16	98
TOTAL	401	218	619

Source: Census Bureau (2000 Census SF 3: H14 and P87)

Local Senior Programs

The Humboldt County Sheriff’s Department SWAP program provides free firewood to seniors. The Bertha Russ Lytel Foundation was formed to help seniors stay in their homes as long as possible. They have assisted the Ferndale Senior Resource Agency by providing a minivan for rides to medical appointments, Eureka, Fortuna and Arcata, as well as the Arcata Airport. The van is wheelchair accessible. Again with the help of the Lytel Foundation, the Ferndale Senior Resource Agency is also providing home delivery of hot meals. This foundation, along with the Ferndale Community Chest and local churches offer assistance with monthly bills, help with maintenance costs associated with home-ownership, help out when seniors and others are faced with unforeseen needs. Another group, Total Socialization, offers senior meals on the first and third Thursday of the month.

Persons with Disabilities

In order to understand the special needs of a community, it helps to look at the number of people in a community who live with a disability, and the types of facilities that are available to them. Six of the major disabilities are listed below:

- Sensory disabilities are conditions that affect the sensory organs, such as blindness, deafness, or a severe vision or hearing impairment.
- Physical disabilities are conditions that substantially limit one or more basic physical activities, such as walking, climbing stairs, reaching, lifting, or carrying.
- Mental disabilities are conditions that affect thinking processes, such as learning, remembering, or concentrating.
- Self-care disabilities are conditions in which basic everyday routines are not met, such as bathing and dressing oneself, or getting around inside the home without assistance.
- Going outside the home disabilities are conditions in which people are confined to their home and cannot leave it without assistance.
- Employment disability is an inability to work at a job or business.

Table 11: Persons with Disability by Employment Status (2000) - City of Ferndale

	Number	Percent
Age 5-64, Employed Persons with a Disability	44	3.4%
Age 5-64, Not Employed Persons with a Disability	67	5.1%
Persons Age 65 Plus with a Disability	83	6.4%
Total Persons with a Disability	194	14.9%
Total Population (Civilian Non-institutional)	1,306	100.0%
Source: Census Bureau (2000 Census SF 3: P42)		

Table 12: Persons with Disabilities by Disability Type (2000) - City of Ferndale

	Number	Percent
<i>Total Disabilities Tallied</i>	383	100.0%
<i>Total Disabilities for Ages 5-64</i>	224	58.5%
Sensory Disability	14	3.7%
Physical disability	71	18.5%
Mental disability	47	12.3%
Self-care disability	17	4.4%
Go-outside-home disability	25	6.5%
Employment disability	50	13.1%
<i>Total Disabilities for Ages 65 and Over</i>	159	41.5%
Sensory Disability	26	6.8%
Physical disability	47	12.3%
Mental disability	20	5.2%
Self-care disability	27	7.0%
Go-outside-home disability	39	10.2%
Source: Census Bureau (2000 Census SF 3: P41)		

As of 2000, the total number of people living in Humboldt County with reported disabilities was 25,116, a number which represents 20.4 percent of the total population. Statewide, 19.4 percent of the state's total population reported some kind of disability in 2000.

In Ferndale, according to the 2000 Census, 194 persons have a disability, representing 14.9 percent of the population. Most people with disabilities were either employed (3.4 percent) or over the age of 65 (6.4 percent). Only 5.1 percent are prevented from working.

Although there has recently been discussion about bringing bus service into Ferndale, it has been found to be economically infeasible. However, the Ferndale Resource Agency has recently initiated a senior bus service, with service provided to seniors 62 years and over, as well as disabled persons.

Large Families

Large households are defined as households with more than five persons. In some circumstances, where the housing market does not meet large household housing needs, overcrowding can be a significant result of the lack of adequate housing. As discussed earlier, overcrowding is not a significant housing need, with overcrowded situations representing only 1.9 percent of the households in Ferndale.

Table 13: Household Size by Tenure (2000) - City of Ferndale

	1-4 persons		5+ Persons		Total	
	Number	Percent	Number	Percent	Number	Percent
Owner	386	62.4%	15	2.4%	401	64.8%
Renter	193	31.2%	25	4.0%	218	35.2%
TOTAL	579	93.6%	40	6.4%	619	100.0%
Source: Census Bureau (2000 Census SF 3: H17)						

Farmworkers

According to the 1997 Census of Agriculture, there are 1,345 farmworkers in Humboldt County, approximately half of which are on smaller farms of ten or less workers. In 2000, there were 39 persons employed in agriculture, forestry, fishing and hunting, and mining. In the Eel River Valley, farmworker housing needs are not very significant and most farming operations are dairies.

Table 14: Number of Farmworkers (1997) – Humboldt County

Hired Farm Labor		
	Farms	279
	Workers	1,345
Farms with 10 Workers or More		
	Farms	15
	Workers	651
Source: USDA 1997 Census of Farmworkers and COG Plan		

Table 15: Farmworkers by Days Worked (1997) – Humboldt County

150 Days or More		
	Farms	156
	Workers	630
<i>Farms with 10 or More Workers</i>		
	Farms	4
	Workers	(D)
Fewer than 150 Days		
	Farms	236
	Workers	715
<i>Farms with 10 or More Workers</i>		
	Farms	8
	Workers	252
Source: USDA 1997 Census of Farmworkers and COG Plan		

Female-headed Households

The Census provides data on the total number of households with a female head and the number of those with children and the number with incomes below the poverty level. The data is not provided separately by owner and renter. The data required includes all female heads of household; those without children may be supporting parents, or a single parent may be supporting an adult child or relative. Female heads of household are often the households most in need of affordable housing, childcare, job training and rehabilitation funds.

In Ferndale, there were 51 female headed households, according to the 2000 Census. Of these 51 female headed households, nine were below the poverty level, which is 52.9 percent of the 17 families found under the poverty level according to the 2000 Census.

Table 16: Female Headed Households (2000) - City of Ferndale

Householder Type	Number	Percent
Female Headed Householders	51	13.6%
<i>Female Heads with Own Children</i>	17	4.5%
<i>Female Heads without Children</i>	34	9.1%
Total Family Householders	374	100.0%
Female Headed Householders Under the Poverty Level	9	52.9%
Total Families Under the Poverty Level	17	100.0%
Source: Census Bureau (2000 Census SF 3: P10 and P90)		

Families and Persons in Need of Emergency Shelter

Contact with the local police department and other emergency care people has indicated that there are no homeless people in Ferndale. A reason for this may be that Ferndale is located six miles from the closest public bus service. The local community church offers help to travelers in need of emergency shelter and food.

Overcrowded Households

The United States Census Bureau defines overcrowding when a housing unit is occupied by more than one person per room (not including kitchens and bathrooms). Units with more than 1.5 persons per room are considered severely overcrowded and indicate a significant housing need.

Overcrowding is not a major housing situation in Ferndale. According to the 2000 Census, there were a total of 12 overcrowded households, representing only 1.9 percent of the total households. The number of overcrowded situations has not changed much since the four overcrowded households reported in 1990. To compare, overcrowding is much more significant in California with 15.2 percent of the total households in overcrowded situations in 2000.

Of the total of 12 overcrowded households, nine were renter households and three were owner households. Of the total overcrowded households, six renters reported being severely overcrowded.

Table 17: Overcrowded Households (2000) - City of Ferndale

Households	Owners	Renters	TOTAL
TOTAL HOUSEHOLDS	401	218	619
Total Overcrowded Households	3	9	12
1-1.5 Persons per Room	3	3	6
1.5 or More Persons per Room	0	6	6
Statewide Overcrowding Rates	8.6%	23.9%	15.2%
Source: Census Bureau (2000 Census SF 3: H20)			

Households Overpaying

Generally, overpayment for housing considers the total shelter cost for a household compared to their ability to pay. Overpayment is an important measure of the affordability with the City of Ferndale. Specifically, overpayment is defined as monthly shelter costs in excess of 30 percent of a household's income. According to the Census, shelter cost is the monthly owner costs (mortgages, deeds of trust,

contracts to purchase or similar debts on the property and taxes, insurance on the property and utilities) or the gross rent (contract rent plus the estimated average monthly cost of utilities).

In 2000, approximately 154 households (29.7 percent) reporting to the 2000 census were in overpayment situations. This incidence of overpayment occurs fairly evenly between owner (54%) and renter (46%) households. Further, of the 236 households reporting incomes less than \$35,000, approximately half were overpaying in 2000.

Table 18 Households Overpaying (2000) - City of Ferndale

Households	Owners	Renters	TOTAL
Total Households Overpaying	83	71	154
LOWER INCOME HOUSEHOLDS			
Total Households with Income Less than \$35,000	123	113	236
Households Overpaying with Less than \$35,000	55	69	124
Source: Census Bureau (2000 Census SF 3: H69, H73, H94 and H97)			
*Number of households overpaying based on the number of households (518 total: 166 renter and 352 owner) computed by the Census Bureau			

Housing Stock Characteristics

Housing Units by Type

The proportion of single-family units increased significantly since 1990, while the proportion of 5+ unit-housing structures (i.e., multifamily) has decreased in the City of Ferndale. For example, single-family units comprised 81% of the housing stock in 1990 and 85.1% in 2000. At the same time multiple dwelling units decreased. There are currently two major subdivisions in the works in Ferndale for a total of 41 new parcels. The zoning in both areas is Residential Single Family. The possibility of second dwelling units exists in both subdivisions.

Table 19: Housing Units by Type (1990-2000) – City of Ferndale

Housing Unit Type	1990		2000		Change	
	Number	Percent	Number	Percent	Number	Percent
Single Family-Detach	472	79.3%	538	81.0%	66	14.0%
Single Family-Attach	10	1.7%	27	4.1%	17	170.0%
2-4 units	97	16.3%	80	12.0%	-17	-17.5%
5 Plus Units	9	1.5%	10	1.5%	1	11.1%
Mobilehome *	7	1.2%	9	1.4%	2	28.6%
TOTAL	595	100.0%	664	100.0%	69	11.6%
Source: Census Bureau (2000 Census, SF 3: H30) and (1990 Census, STF: H020)						
*Mobilehomes includes "Other" (i.e., RV, Campers)						

Vacancy

Vacancy trends in housing are analyzed using a "vacancy rate" which establishes the relationship between housing supply and demand. For example, if the demand for housing is greater than the available supply, then the vacancy rate is low, and the price of housing will most likely increase. Additionally, the vacancy rate indicates whether or not the City has an adequate housing supply to provide choice and mobility. HUD standards indicate that a vacancy rate of five percent is sufficient to provide choice and mobility.

Table 20: Population and Housing Estimates 1/1/2004 – Ferndale, Humboldt County

Humboldt County Cities	---POPULATION--			----- HOUSING UNITS -----								PERSONS PER HOUSE-HOLD
	TOTAL	HOUSE HOLD	GROUP QUARTERS	TOTAL	SINGLE		MULTIPLE			OCCUPIED	% VACANT	
					DETACHED	ATTACHED	2 TO 4	5 PLUS	MOBILE HOMES			
ARCATA	17,111	15,387	1,724	7,376	3,408	269	1,173	1,843	683	7,151	3.05	2.152
BLUE LAKE	1,171	1,171	0	576	380	21	68	36	71	523	9.20	2.239
EUREKA	26,258	24,903	1,355	11,741	7,262	381	2,223	1,701	174	11,053	5.86	2.253
FERNDALE	1,394	1,394	0	690	561	27	83	10	9	623	9.71	2.238
FORTUNA	11,075	10,840	235	4,678	3,127	232	524	351	444	4,435	5.19	2.444
RIO DELL	3,207	3,197	10	1,454	1,010	26	150	36	232	1,238	14.86	2.582
TRINIDAD	315	315	0	233	183	8	11	0	31	171	26.61	1.842

In 2000, the average household size in Ferndale was 2.26 individuals. Of 663 total housing units, 611 (92.2 percent) were occupied; 52 (7.8 percent) were vacant, and 17 (2.6 percent) were used seasonally or for recreation purposes. The homeowner vacancy rate was 1.8 percent, and the rental vacancy rate was 3.8 percent.

Table 21: Owners / Renters by Cities in Humboldt County

Geographic area	Occupied housing units	Specified owners			Specified renters		
		Median value (dollars)	Median selected monthly owner costs (dollars)		Median contract rent (dollars)	Median gross rent (dollars)	Percent with meals included in rent
			With a mortgage	Not mortgaged			
California	11,502,870	211,500	1,478	305	677	747	1.4
PLACE							
Arcata city, Humboldt County	7,066	149,000	973	262	485	546	0.0
Blue Lake city, Humboldt County	495	119,000	804	240	500	583	0.0
Eureka city, Humboldt County	10,942	114,000	875	234	428	495	0.9
Ferndale city, Humboldt County	619	162,100	1,148	310	482	559	0.0
Fortuna City, Humboldt County	4,190	130,700	960	234	462	526	0.0
Rio Dell city, Humboldt County	1,234	95,800	805	237	415	491	1.2
Trinidad city, Humboldt County	170	321,200	1,000	294	663	830	0.0

U.S. Census, 2000

Housing Costs

Sales prices for home in Ferndale have risen steadily in the last nine years. As the lots available are sold, we predict the housing prices will continue to rise. Rentals in the area vary from a Studio from \$450 to \$550, to a three-bedroom apartment above a commercial business going from \$750 to \$800. Single-family houses for rent vary from \$650 up to \$1200, according to the local newspaper listings.

Table 22: Median Area Sales Prices – Ferndale

Year	Average \$	# houses sold
January, 2003	276,693	33
January, 2002	230,618	30
January, 2001	223,019	26
January, 2000	171,300	27
January, 1999	166,634	42
January, 1998	157,088	19
January, 1997	180,066	17
January, 1996	149,294	19
January, 1995	133,000	17

Source: Ferndale Enterprise. These are houses listed with MLS and include houses in the Ferndale area, not necessarily inside the Ferndale City Limits. The highest and lowest are not included.

Construction Trends

As mentioned previously, two new subdivisions are in the system for approval. The total new buildable parcels proposed are 41. These are all located in single-family zones. As shown in the chart below, in the last 10 years, 42 permits have been issued for single-family dwellings, and only nine for multi-family units. In the near future, additional single-family dwellings will be built in the subdivisions. There is a potential for Second Dwelling Units in the Residential Single Family and Residential Suburban zones, and some infill spots available, but not for sale. For the most part, we predict that single-family dwellings will continue to be prevalent within the city limits.

Table 23: Housing Permits issued – Ferndale

	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	Total
Single Family Units														
>\$300,000							1			1		1		3
\$200,000-299,000	1						1	2	2	2		1	2	11
\$150,000-199,000		2		2	2	2	2	2	2	4	2	1		21
\$100,000-149,000		2	2	1			1	1	1	3	2		1	14
\$50,000-99,000	1		1			1						1	1	5
<\$50,000												1		1
Single family permits	2	4	3	3	2	3	5	5	5	10	4	5	4	55
Multi Family Units														
>\$300,000														0
\$200,000-299,000								1						1
\$150,000-199,000														0
\$100,000-149,000					1	1			1					3
\$50,000-99,000							1							1
<\$50,000	3							1						4
Multi family permits	3	0	0	0	1	1	1	2	1	0				9

Table 24: Types of Housing – Ferndale

Type of Housing	No.	Percent
Total Housing Units	664	100.0
1-unit, detached	538	81.0
1-unit, attached	27	4.1
2 units	47	7.1
3 or 4 units	33	5.0
5 to 9 units	8	1.2
10 to 19 units	2	0.3
20 or more units	0	0.0
Mobile home	7	1.1
Boat, RV, Van, etc.	2	0.3
Source 2000 US Census Data		

Housing Stock Conditions

Housing Condition

Many Housing Elements use age of housing stock to infer condition and need for rehabilitation. This approach is probably not valid in Ferndale, which is noted for its historic architecture.

Almost half of Ferndale’s structures date to 1939 or earlier. However, the oldest examples of houses in the “Victorian Village” are often the most sought after, with buyers often willing to pay a premium price. As a direct result of the investment value of these structures, many have already been rehabilitated and upgraded. Structures in the central core of the city are subject to design review to ensure that rehabilitation efforts are tasteful and consistent with neighborhood characteristics.

Many of the earlier structures also used construction materials and standards that would be prohibitively expensive to duplicate today. For example, walls of the earlier structures are typically plated with solid redwood, and fine ornamental details are often present. Thus, measurements other than age must be used to assess condition.

Table 25: Age of Housing – Ferndale

Year Built	No.	Percent
1999 to March 2000	6	0.9
1995 to 1998	20	3.0
1990 to 1994	27	4.1
1980 to 1989	26	3.9
1970 to 1979	68	10.2
1960 to 1969	67	10.1
1940 to 1959	123	18.5
1939 or earlier	327	49.2
Source 2000 US Census Data		

In the final months of 2004 and the early months of 2005, the Planning Department, conducted a walking Housing Condition Survey. All buildings in Ferndale were viewed and scored using a form adapted from the Housing and Community Development Department. Because all buildings were visited with a walking tour, street and sidewalk condition was also inspected. See the following page for the form.

There is a need for rehabilitation in the City of Ferndale. Many of the houses requiring rehabilitation need only minor to moderate repairs (13% minor; 11.32% moderate). As the charts below show, of the 30.94% needing substantial rehabilitation, most of them are multiple family dwellings. Only 1.35% of the total housing needs replacement or major rehabilitation.

A rehabilitation program would be a helpful goal. A program to encourage maintenance, preservation, improvement and development of affordable housing would also be helpful.

Table 26: Housing Conditions - City of Ferndale

Condition	Number		Percent	
Sound	438		65.96%	
Need Rehabilitation	205		30.87%	
Need Replacement	6		00.91%	
Not Evaluated	15		02.26%	
TOTAL	664		100%	

Housing Condition	Single Family Dwellings		Multiple Family Dwellings		Total	
	Number	Percent	Number	Percent	Number	Percent
Sound	412	69.36%	26	37.14%	438	65.96%
Minor	70	11.78%	20	28.57%	90	13.55%
Moderate	80	13.47%	9	12.86%	89	13.40%
Substantial	18	3.03%	8	11.43%	26	3.92%
Dilapidated	6	1.01%	0	0.00%	6	.90%
Not Evaluated	8	1.35%	7	10.00%	15	2.26%
Total Housing Units	594	100%	70	100%	664	100%

Source: City Planner Walking Survey

Chapter Three: Resources and Constraints

Locality Share of Regional Housing Need

A Regional Housing Needs Plan (RHNP) is mandated by the State of California (Government Code (GC), §65584) for regions to address housing issues and needs based on future growth projections for the area. The State of California also establishes the number of total housing units needed for each region. The RHNP is developed by the Humboldt County Association of Governments (HCAOG) and allocates to cities and the unincorporated county their “fair share” of the regions projected housing needs. The RHNP allocates “fair share” needs based on household income groupings over a period of eight years.

The intent of the RHNP is to ensure that local jurisdictions address not only the needs of their immediate area but also provide their share of housing needs for the entire region. Additionally, a major goal of the RHNP is to assure that every community provides an opportunity for a mix of affordable housing to all economic segments of its population. The RHNP jurisdictional allocations are made to ensure that adequate sites and zoning are provided to address existing and anticipated housing demands during the planning period and that market forces are not inhibited in addressing the housing needs for all facets of a particular community. Table 27A provides the Regional Housing Needs Allocation (RHNA) target for the planning period of 2001 to 2008 for each of the four household income groups for the City of Ferndale.

Table 27A: Regional Housing Needs (2001 to 2008) – City of Ferndale

Income Group	Number	Percent
Very Low	2	11.8%
Low	4	23.5%
Moderate	2	11.8%
Above Moderate	9	52.9%
TOTAL	17	100.0%

Source: Regional Housing Need Plan

Based on these projections, the City of Ferndale needs to provide 17 houses in the years from 2001 to 2008. The allocation is equivalent to a yearly need of two housing units for the eight-year period. Three second dwelling unit (SDU) building permits have been issued since 2001, and at least one per year is expected to be built, based on past trends. These units are likely to be affordable to lower-income households due to their smaller size and lower rent.

With the acceptance of a major subdivision before the City Council in 2005, an additional 33 parcels will be available for single-family dwellings, with the possibility of 33 Second Dwelling Units. It is expected that these parcels will hold moderate and above moderate homes.

Additionally, Ferndale’s Zoning Ordinance should be amended to allow for persons with disabilities, emergency shelters, transitional housing and employee housing. A Density Bonus Ordinance would increase the availability of permanent housing for all community residents.

Table 27B: Progress toward the Regional Housing Need (Jan. 2001 to 2005)

Income Group	Regional Housing Need	Units Constructed	Remaining Housing Need
Very Low	2	0	2
Low	4	4	0
Moderate	2	0	2
Above Moderate	9	27	0
TOTAL	17	28	4
Source:			

The City of Ferndale has issued 26 building permits for single family homes and 3 permits for second units. All of these units are market rate. Market rate single family homes are currently being sold around \$300,000 which is affordable to above moderate income households. Multifamily and second units are conservatively renting for \$800 or less which is affordable to a lower income household based on the Humboldt County Area Median Income of \$49,100 and a family of four persons.

Land Inventory

Identification of Available Land and Sites by Zoning District and Realistic Capacity

Housing Element law requires an inventory of land suitable for residential development. An important purpose of this inventory is to determine whether a jurisdiction has allocated sufficient land for the development of housing to meet the jurisdiction's share of the Regional Housing Needs, including housing to accommodate the needs of all household income levels. Refer to attached Zoning Map, which outlines each available parcel and shows current zoning.

There is limited land available in Ferndale because the City has maintained its one square mile of city limits; however, according to the chart below, there is still sufficient available land to build many more dwellings, if needed. At this time, the City does not plan to annex additional land.

Table 28: Vacant Land Summary by Zone – Ferndale

General Plan and Zone Designation	Allowable Uses	With Use Permit	Acres	Density Range	Dwelling Unit Capacity
Agriculture-Exclusive (AE)	Farm dwellings	B&B	120.8	.25/acre	30 dwellings
Split Ag-Exclusive, Residential Single Family (R1-AE)	Residence in one zone or the other		10.8	.25/acre	2 dwellings
Residential Single Family, 6000 sf minimum (R1)	1-family dwellings	Guest houses, B&B, SDUs	34.26	0-7/acre	35-245 dwellings
Residential Single Family, 8000 sf minimum (R1B1)	1-family dwellings	Guest houses, B&B, SDUs	0.23	0-7/acre	1 dwelling
Residential Single Family, 10,000 sf minimum (R1B2)	1-family dwellings	Guest houses, B&B, SDUs	9.28	0-4/acre	10-37 dwellings
Residential Single Family, 20,000 sf minimum (R1B3)	1-family dwellings	Guest houses, B&B, SDUs	5.71	0-2/acre	5-11 dwellings
Residential Two Family (R2)	1 or 2 family dwellings	Guest houses, B&B	8.38	0-14/acre	9-117 dwellings
Residential Suburban, 1 acre minimum (RS)	1-family dwelling	B&B, SDUs	12.56	0-1/acre	12 dwellings
Neighborhood Commercial Design Review Qualified (C1DQ)	1-Family dwellings	2 to 4 family dwellings	.31	0-21/acre	1-6 dwellings
Community Commercial (C2)	Dwellings		1.56	0-21/acre	1-32 dwellings
Community Commercial Design Review Qualified (C2DQ)	1-Family dwellings	2 to 4 family dwellings	.60	0-21/acre	1-12 dwellings

Source: 2005 Inventory by Staff

Housing Element law was recently amended and has a new requirement to include a site-by-site inventory sufficient to meet the regional housing need in the next five years. Ferndale has opted to include all vacant property. See Attachment A for a map showing vacant land.

Table 29: Vacant Land Inventory by Parcel Number – Ferndale

Parcel Number	Acreage	Existing Use	Zone	Realistic Capacity	Potential Constraints
030-011-001	5.04	agricultural	AE	3.53	Agricultural Land, not for sale
030-011-002	5.01	fairgrounds	AE	3.51	5th St, private road, goes thru property
030-031-001	10.79	agricultural	AE	7.55	Agricultural Land, not for sale
030-041-002	5.03	agricultural	AE	3.52	Agricultural Land, not for sale
030-051-001	13.09	agricultural	AE	9.16	Agricultural Land, not for sale
030-061-007	2.39	agricultural	R1/AE	1.67	Drainage, split zone
030-091-014	0.20	vacant	R1	0.14	Plans Submitted, Sewer Moratorium
030-091-015	0.20	vacant	R1	0.14	Sewer Moratorium
030-091-021	15.70	agricultural	R1	10.99	Just subdivided into 29 lots
030-091-024	1.51	agricultural	R1	1.06	Just subdivided into 4 lots
030-101-008	1.05	agricultural	R1B2	0.73	No access, Agricultural Land, not for sale
030-111-003	1.38	agricultural	AE	0.96	Agricultural Land, not for sale
030-111-015	1.74	agricultural	R1D	1.22	Drainage
030-112-019	1.32	agricultural	R1D	0.92	35' entry won't support more than 2 dwellings, creek cuts off Main Street
030-131-006	0.24	vacant	R1D	0.17	Not for Sale
030-131-024	0.21	road	R1	0.15	60' row goes through lot to lots behind
030-141-010	1.49	agricultural	R1	1.04	to develop must bridge Francis Creek
030-151-006	11.06	agricultural	RS	7.74	Agricultural Land, not for sale
030-161-017	0.43	agricultural	R1	0.30	owner uses as orchard
030-161-020	1.31	agricultural	AE	0.92	Flag Lot, not for sale
030-171-003	0.14	vacant	R2	0.10	Sewer Moratorium
030-171-005	0.31	vacant	C1DQ	0.22	Sewer Moratorium
030-171-008	4.32	agricultural	AE	3.03	drainage
030-172-015	0.15	vacant	R2D	0.11	Sewer Moratorium
030-181-004	0.28	vacant	R2	0.19	Sewer Moratorium
030-181-008	5.39	agricultural	R2/AE	3.77	Agricultural Land, not for sale
030-191-007	2.23	agricultural	R2/AE	1.56	Agricultural Land, not for sale
030-191-008	8.41	agricultural	R1/AE	5.89	Agricultural Land, not for sale
030-201-009	0.14	vacant	R1D	0.10	Sewer Moratorium
030-211-002	0.27	vacant	R1D	0.19	Sewer Moratorium

Parcel Number	Acreage	Existing Use	Zone	Realistic Capacity	Potential Constraints
030-211-008	18.18	agricultural	AE	12.73	Agricultural Land, not for sale
031-013-004	0.28	agricultural	AE	0.19	no access
031-013-018	0.54	agricultural	AE	0.38	no access
031-021-009	0.13	vacant	R2	0.09	triangularly shaped lot, difficult access
031-024-003	0.13	vacant	AE	0.09	steep grade, difficult access
031-031-003	0.63	vacant	R1D/R1	0.44	mostly steep grade, difficult access
031-032-002	0.00	vacant	R1D	0.00	unbuildable - in creek
031-032-007	0.60	vacant	C2DQ	0.42	difficult access, partially in creek
031-032-009	0.06	vacant	R2D	0.04	undersized at 2640, no access
031-032-015	0.22	vacant	R1D	0.15	steep grade
031-032-026	0.00	vacant	AE	0.00	unbuildable - steep grade
031-032-028	0.07	vacant	C2D	0.05	undersized at 3000 sf, only 30' wide
031-032-029	1.67	agricultural	R1	1.17	Odd shaped lot, steep, no access
031-041-005	3.70	vacant	AE	2.59	very steep grade
031-051-007	1.87	agricultural	AE	1.31	very steep grade
031-051-015	14.46	agricultural	AE	10.12	very steep grade
031-051-017	1.74	agricultural	AE	1.22	very steep grade
031-051-018	0.52	agricultural	AE	0.36	oddly shaped lot at end of Francis Street
031-061-003	20.00	agricultural	AE	14.00	Agricultural Land, not for sale
031-071-012	0.21	vacant	R1	0.15	Owned by Neighbor, part of yard
031-082-003	0.50	vacant	R1D	0.35	Sewer Moratorium
031-083-004	0.22	barn	C2D	0.15	Sewer Moratorium
031-085-022	0.80	vacant	C2D	0.56	Alley access, creek
031-112-001	0.38	vacant	R1B3	0.27	steep access off Bluff Street
031-112-004	0.34	vacant	R1B3	0.24	steep access off Bluff Street
031-121-003	3.13	vacant	AE	2.19	no access w/o building bridge over creek
031-121-006	0.54	vacant	AE	0.38	Steep, by creek
031-121-007	0.18	agricultural	AE	0.13	undersized AE lot
031-121-009	1.83	vacant	R1B2	1.28	Steep, by creek
031-121-011	0.33	vacant	AE	0.23	very steep grade
031-131-027	0.00	vacant	R2D	0.00	unbuildable - undersized lot
031-131-033	0.22	vacant	R1D	0.15	Sewer Moratorium
031-131-039	0.22	vacant	R1D	0.15	Sewer Moratorium
031-131-048	1.32	vacant	R1	0.93	access thru privately owned road
031-131-049	0.45	barn	R1	0.32	no access
031-131-051	0.31	vacant	R1B2	0.22	access thru privately owned road

Parcel Number	Acreage	Existing Use	Zone	Realistic Capacity	Potential Constraints
031-132-003	0.16	vacant	C2D	0.11	Sewer Moratorium
031-132-017	0.16	Vacant	C2D	0.11	Sewer Moratorium
031-142-017	0.15	vacant	C2D	0.10	currently used as parking lot
031-151-020	0.55	vacant	R1	0.38	no access
031-162-007	0.00	vacant	R2	0.00	unbuildable - undersized lot
031-163-025	0.58	vacant	R1B3	0.41	Odd shaped lot
031-163-027	2.05	vacant	R1B3	1.44	very steep, no access
031-163-028	1.81	vacant	R1B3	1.27	Sewer Moratorium
031-171-013	1.84	vacant	R1B2	1.29	may be subdivided
031-171-017	5.62	agricultural	AE	3.94	Agricultural Land, not for sale
031-171-018	0.00	agricultural	AE	0.00	unbuildable - too narrow at 20' wide
031-171-027	0.30	vacant	R1	0.21	Owned by Neighbor, part of yard
031-171-038	0.28	vacant	R1B2	0.19	drainage
031-171-044	0.25	vacant	R1B2	0.17	Sewer Moratorium
031-183-032	0.20	vacant	R1	0.14	Sewer Moratorium
031-183-033	1.91	vacant	R1	1.34	drainage
031-192-013	0.25	barn	R1	0.17	Alley access only
031-192-021	0.20	vacant	R1	0.14	Sewer Moratorium
031-202-002	3.57	vacant	AE	2.50	Agricultural Land, not for sale
031-202-003	1.50	vacant	RSB5	1.05	Sewer Moratorium
031-212-002	0.55	vacant	R1B3	0.38	very steep grade
031-232-016	0.23	vacant	R1B1	0.16	Sewer Moratorium
031-241-007	0.53	vacant	R1	0.37	Sewer Moratorium
031-242-018	0.21	vacant	R1	0.14	Owned by Neighbor, part of yard
031-251-002	2.81	vacant	R1B2	1.97	Sewer Moratorium
031-251-003	0.46	vacant	R1B2	0.33	Sewer Moratorium
031-251-005	0.45	vacant	R1B2	0.31	Sewer Moratorium
031-251-010	0.23	vacant	R1	0.16	Sewer Moratorium
031-251-016	0.99	vacant	R1	0.69	no access

Analysis of Suitability (Physical and Environmental)

Some properties in Ferndale are considered unbuildable because of steep slopes and drainage problems. Other properties are suitable, but not for sale at this time.

Analysis of Zoning that Facilitates Development by Income Group

Zones R3, R4, C1 and C2 are appropriately rated for lower income housing. The densities in these zones are 0-21 dwellings per acre. As noted elsewhere, additional R3 and R4 zones should be set aside to allow for more apartment-style dwellings, which would be more affordable for lower

income groups; however, in the time frame of this Housing Element (5 years), zone changes will not be necessary.

Availability of Infrastructure

In September, 2005, the Water Quality Control Board issued a cease and desist order which prohibits the City from issuing any building permits that would result in any new hookups to the sewer system. This is the biggest constraint on further building in Ferndale. Land costs continue to rise, as do building costs. That being said, the City of Ferndale is committed to fixing our sewer problems as soon as possible so that building can continue.

Del Oro Water Company supplies water within the City of Ferndale. The City of Ferndale water supply system's maximum capacity is 518,000 GD. Current production average is 208,000 GD. Sixty-nine percent of the water is pulled from springs on the southern end of Ferndale. The springs run at full capacity, with back up production from the "Van Ness Street Well."

Analysis of Redevelopable Sites

At this time, there are no properties that are for sale that could be considered redevelopable. However, if the sewer moratorium continues for any length of time, those properties that are already hooked up to the sewer lines and that could be redeveloped will become more valuable.

Analysis of Zoning that Facilitates Transitional Housing, Emergency Shelters and Housing for Farmworkers

In a city of one square mile, and with the high cost of land, the population base needed to support the cost of building transitional housing is not available. As noted elsewhere, homelessness is not an issue in Ferndale. Emergency shelter is available during floods and earthquakes at the Humboldt County Fairgrounds for the Eel River valley. Most farm workers are housed on employer's farms.

Analysis of Realistic Capacity

The Neighborhood (C1) and Community Commercial (C2) zones allow for needed apartment dwellings with a Use Permit. Because adequate land is available in the C zones for up to 38 additional dwellings, it is not necessary at this time to pursue zone changes.

With the Cease and Desist Order in effect, the City of Ferndale must replace its wastewater treatment plant in order to come into compliance with the Water Quality Control Board. As sewer hookups become available, priority shall be granted to proposed developments that include housing units affordable to lower income households. (GC 65589.7)

Del Oro Water Company has no plans to expand water services, as current operating levels of 40.3% of capacity are sufficient.

Housing and Community Development has offered an estimated realistic capacity of 70%, which would take into consideration infrastructure on each available piece. This figure is used in Table 29, above.

Staff's review of the last three subdivisions revealed the following: The Shamsi Court Subdivision averaged 66% of capacity in the R1 zone (10 dwelling units), and 89% of capacity in the R2 zone (10 dwelling units). The Cream Court Subdivision averaged 56% of capacity with 22 lots, all in the R1 zone. The proposed Fifth Street Subdivision will average 28% of capacity with 33 lots, also all in the R1 zone. All three subdivisions were approved as presented with the proposed densities.

As noted previously, Ferndale is committed to fixing our sewer problems as soon as possible so that building can continue. We have given the Regional Water Quality Control Board the following timeline:

Task A	By November 1, 2005, comply with Receiving Water Limitations required in Waste Discharge Requirements by implementing short-term solution to increase dissolved oxygen concentrations.
Task B	By December 31, 2005, submit a detailed analysis of the selected long-term effluent disposal alternative. The report shall include a request for any Basin Plan exceptions, as appropriate, as well as detail progress regarding land acquisition, permitting, financing, and construction of the selected alternative.
Task C	By June 1, 2006, submit documentation that the land necessary for the long-term effluent disposal project has been acquired or a long-term lease is secured.
Task D	By August 1, 2006, complete the California Environmental Quality Act (CEQA) process.
Task E	By September 15, 2006, submit 10% design plans and specifications for construction of the effluent disposal project.
Task F	By November 1, 2006, secure funding for the long-term effluent disposal project. Provide the Regional Water Board with documentation regarding the funding source(s).
Task G	By February 1, 2007, submit 50% design plans and specifications for construction of the effluent disposal project.
Task H	By April 1, 2007, submit final design plans and specifications for construction of the effluent disposal project.
Task I	By November 1, 2007, acquire all necessary permits, including Waste Discharge Requirements from the Regional Water Board.
Task J	By August 31, 2008, complete construction of the effluent disposal project.
Task K	By October 1, 2008, attain full compliance with Waste Discharge Requirements by completing the implementation of long-term plans for treated effluent disposal during the wintertime season.

As shown above, there are available lands within the City Limits to build additional housing units.

From an analysis of the City's zoning and development standards, it is determined that they would not impact a developer from obtaining maximum densities since the high density multi-family zones and the commercial downtown areas have flexible standards for residential development. For example, the commercial district on Main Street has no minimum yards and no requirements for lot coverage. Maximum building height ranges from 35 to 45'. The high density residential zones (R3 and R4) allow for a 60% lot coverage, and setbacks of 20' in front, 10' in the rear, and 5' on the sides. The maximum building height in both zones is 45'. However, a density bonus ordinance would be helpful.

Analysis of Governmental Constraints

It is in the public interest for the government to regulate development to protect the general welfare of the community. At the same time, government regulations can potentially constrain the supply of housing available in a community if the regulations limit opportunities to develop housing, impose requirements that unnecessarily increase the cost to develop housing, or make the development process so arduous as to discourage housing developers. State law requires housing elements to contain an analysis of the governmental constraints on housing maintenance, improvement, and development (GC §65583(a)(4)).

In the last five years, city staff has endeavored to streamline the building and land use permit processes. The application guide for development permits was re-written in standardized language, and all permits and procedures are now available on the city's web page <http://ci.ferndale.ca.us>. This has made it easier for citizens to obtain applications and to understand the period of time involved in processing the application.

At the same time, the position of City Planner was brought in-house to shorten the length of time previously taken to review building permit and land use permit applications. Just this year, the contracted position of Building Inspector was changed from a firm approximately 25 miles away to an individual six miles away. The plan check process has gone from six weeks to a week. Building inspections are done on a daily basis, if required. The city has heard favorable comments from individuals and contractors in the city.

The City Clerk, City Planner and City Manager have combined and revised the filing system and entered previous permits on a database. All these changes have made it easier to find information about any address in Ferndale, and have streamlined the permit process.

City staff has developed a long-term plan to re-write and standardize all city ordinances. As the ordinances are adopted by the City Council, they are posted to our web page so that citizens can peruse them at any time.

Land Use Controls

Analysis

Land use controls consist of the Zoning Ordinance, Building Code and Subdivision regulations. Any of these tools for regulating development activity taken to extremes can represent significant obstacles to the production of housing. In that some of these regulations are created at the discretion of the city, they are viewed as constraints each city is capable of imposing. Local land use controls constrain housing development by restricting housing to limited sections of the city and by restricting the number of housing units that can be built on a given parcel of land at any particular time.

As noted elsewhere, Ferndale has many historical buildings. The Zoning Ordinance outlines a large section of the city where design control regulations are enforced; however, the Zoning Ordinance does not clearly define design review criteria, nor is there mention of historical preservation. This is a constraint that should be dealt with in this Housing Element period.

Mobile Homes are principally permitted outside of the design review area on any residential lot, by section 3.49.2 of the Zoning Ordinance 02-02:

- 3.49.2 Mobile homes on individual lots: A mobile home shall be permitted on an individual lot as a single-family dwelling unit, only if it meets the following requirements:
- a. Eligibility:
 - i. The mobile home must be certified under the National Mobile Home Construction and Safety Standards Act of 1974.
 - ii. The mobile home must be installed on a permanent foundation system designed in accordance with the provisions of Chapter 29 of the Uniform Building Code, 1979 Edition, or applicable provisions of subsequent editions adopted for use by the City.
 - iii. The mobile home must comply with all development standards specified in the zone in which the mobile home is to be placed.
 - iv. The mobile home must be located within an area of the City determined to be compatible with mobile home use, as defined in the Compatibility Section, below.
 - b. Compatibility: Mobile homes shall be considered compatible in those areas outside of the Design Control Combining or -D Zones, as particularly described on the Zoning Map of the City of Ferndale. The Design Control districts designated on said map have been found to be both of significant historical value and of overall unique architectural character, warranting protection of preservation efforts and infill development of comparable nature. Therefore, mobile homes, as defined herein, are not found to be compatible with these areas, but shall be permitted in all other areas of the City wherein single family dwellings are a principal permitted use of land.

The City’s commitment to mobile/manufactured homes should be clarified and updated in relation to Government Code 65852.3.

The General Plan establishes policies that guide new development including residential development. These policies along with zoning regulations control the amount and distribution of land allocated for different land used in the City. The land use designations established by the General Plan allow single-family and multiple-family residential developments. The Zoning Ordinance further describes the residential land use designations. These land use designations provide for a range of residential densities ranging from one residence per acre to 21 residences per acre.

Table 30: Zoning Land Use Descriptions

Designation	Notes
Residential-Suburban or R-S Zone.	The Residential-Suburban or R-S Zone is intended to be applied in areas of the City which are particularly suited to large lot development of single-family homes.
Residential One-Family or R-1 Zone.	The Residential One-Family or R-1-Zone is intended to be applied in areas of the City where topography, access, utilities, public services and general conditions make the areas suitable and desirable for single family home development.
Residential Two-Family or R-2 Zone.	The Residential Two-Family or R-2 Zone is intended to be applied in areas of the City close to urban centers where all utilities and

	services are available and where housing demand justifies a density of two families on each building site.
Residential Multiple Family or R-3 Zone.	The Residential Multiple Family or R-3 Zone is intended to be applied in areas of the City where it is reasonable to permit and protect low density Apartment developments.
Apartment-Professional or R-4 Zone.	The Apartment-Professional or R-4 Zone is intended to apply in areas suitable for higher density residential uses and for professional and business offices and institutional uses.
Special Building Site Combining or -B Zone.	The Special Building Site Combining or -B Zone and sub-zones there under are intended to be combined with any principal zone in which sound and orderly planning indicate that lot area and yard requirements should be modified.

The requirements for building heights, set-backs, design, parking and other property development standards are comparable to other communities in the region, and do not pose undue constraint to the development of housing in Ferndale. Allowable lot coverage ranges from 35 to 60 percent, depending on zoning density, with allowable heights ranging from 35 feet to 45 feet.

Table 31: Development Standards - City of Ferndale

	Zoning District R1	Zoning District R2	Zoning District R3	Zoning District R4	Zoning District RS
Density Range	0-7 per acre	0-14 per acre	0-21 per acre	0-21 per acre	0-1 per acre
Setbacks	F 20'; R 15'; S 10%	F 20'; R 15'; S 10%	F 20'; R 10'; S 5'	F 20'; R 10'; S 5'	F 20'; R 15'; S 10%
Lot Coverage	35%	40%	60%	60%	None
Minimum Lot Size	6,000 sf	6,000 sf	6,000 sf	6,000 sf	1 acre
Min Unit Size			600 sf	600 sf	None
Parking	1 per dwelling	1 per dwelling	1 per dwelling	1 per dwelling	1 per dwelling
Height Maximum	35'	35'	45'	45'	35'

Codes and Enforcement

New construction in Ferndale must comply with the Uniform Building Code (UBC) of 1997. The City adopted the 1997 UBC with no major revisions, meaning that there are no extraordinary building regulations that would adversely affect the ability to construct housing in Ferndale. Enforcement in the City of Ferndale is conducted on a complaint basis.

On/Off-site Improvement Standards

“Improvement” refers to such street work, storm drainage, utilities and landscaping to be installed, or agreed to be installed, by the subdivider on the land to be used for public or private streets, highways, and easements, as are necessary for the general use of the lot owners in the subdivision and local neighborhood traffic and drainage needs, and as a condition prior to the approval and acceptance of the Final Map; or, to such other specific improvements or type of improvements, the installation of which, either by the subdivider, by public agencies, by private utilities, by any other entity approved by the local agency is necessary or convenient to insure conformity to, or implementation of, the Ferndale General Plan, any adopted specific plans, and/or any applicable Ordinances of the City of Ferndale. Improvements shall be constructed in accordance with the City of Ferndale Standard Specifications and/or when applicable with standards as adopted by local utility companies and approved by the City Engineer.

The subdivider shall construct all required improvements both onsite and offsite according to approved standards adopted by the City, or as otherwise determined by the City Engineer. No Final Map or Parcel Map shall be presented to the Council or to the City Engineer for approval until the subdivider either completes the required improvements, or enters into an agreement with the City agreeing to do such work.

Improvements shall be required for all subdivisions and may include: Frontage Improvements; Storm Drainage; Sanitary Sewers; Street Lights; Water Supply and Utilities. All utilities within the subdivision and along peripheral streets shall be placed underground except those facilities exempted by the Public Utilities Commission regulations.

See Attachment B – City of Ferndale Improvement Standards and Specifications (pp 1-10).

Fees and Exactions

The following discussion of fees does not take into consideration land costs or other mitigation fees outside the control of the City. There are a number of planning and development fees that are charged for the review and approval of general plan amendments, zone changes, conditional use permits, variances, subdivision maps, sit plans and service requests. Depending on the complexity of the requests, these fees can total several hundred to several thousand dollars per unit.

Table 32: Planning and Development Fees - City of Ferndale

Fee Category	Fee Amount
BUILDING, PLANNING AND APPLICATION FEES	
Variance	\$400
Conditional Use Permit	\$500
Home Occupation Permit	\$150
General Plan Amendment	\$1000
Zone Change	\$1000
Lot Line Adjustments	\$550
Minor Subdivision	\$1550
Major Subdivision	\$2250 + \$100/lot
Plan Check, Single Family Residence	\$1200 approximately
Design Review	\$150
Plot Plan Review	\$30
Sewer Hookup Fees (raised from \$1600 due to replacement of Treatment Plant)	\$5180.16
Drainage Fee for new Single Family Residence	\$2500

Processing and Permit Procedures

Developers must negotiate several steps to secure all necessary approvals to build housing on a given parcel of land. From the standpoint of the City, this process is necessary to ensure that new development adequately complies with local regulations that are meant to protect the health, safety, and welfare of the community. From the developer’s standpoint, this process can complicate and lengthen the development process, increasing difficulty and cost to develop new housing.

Variances are required in instances where strict application of the terms of the Zoning regulations, other than regulations directly pertaining to the use of land and buildings which are not existing nonconforming uses, may be granted upon certain findings:

1. That any variance granted shall be subject to such conditions as will assure that the adjustment thereby authorized shall not constitute a grant of special privilege, inconsistent with the limitations upon other properties in the vicinity and zone in which the subject property is situated, and
2. That because of special circumstances applicable to subject property, including size, shape, topography, location or surroundings, the strict application of the zoning regulations is found to deprive the subject property of privileges enjoyed by other properties in the vicinity and under identical zone classification, or
3. That any variance granted will not be contrary to the intent of the zoning regulations or to the public interest, safety, health and welfare, and,
4. Where due to special conditions or exceptional characteristics of such property, or its location or surroundings, a literal enforcement of the zoning regulations would result in practical difficulties or unnecessary hardships.

A variance can only be approved by the Planning Commission following a noticed Public Hearing. Staff prepares a report outlining the proposed project and generally recommends approval (if the findings can be made). Conditions may be imposed in the approval of a variance in order to reduce or eliminate potentially adverse impacts of proposed development allowed by the variance.

Use permits may be granted by the Planning Commission for any use for which the City of Ferndale Zoning Ordinance requires a use permit.

The purpose of the use permit process is to ensure consistency of a proposed land use with City regulations and compatibility of the use with surrounding properties. Use permits are required for any use permitted with a use permit as specified in the Zoning Ordinances Regulations for the Principal Zones. Applications are filed at the office of the City Clerk and are accompanied by such information as may be required to describe fully the proposed use for which the permit is sought. A Public Hearing date shall be set. Staff prepares a report outlining the proposed project and generally recommends approval.

The Planning Commission may impose whatever conditions it deems appropriate or necessary in approving a Use Permit and may periodically review a use which was granted in a Use Permit to ensure that the use continues to operate in accordance with conditions of approval. Furthermore, use permits may be granted for a limited time period.

A Home Occupation is any use which, as determined by the Planning Commission, is customarily carried on within a dwelling or unattached structure by the inhabitants and which is clearly incidental and secondary to the residential use of the dwelling.

Home Occupations are permitted as appurtenant and accessory uses to any residential use with a Home Occupation permit approved by the Planning Commission. The Zoning Ordinance requires that a Home Occupation:

1. is confined completely within the dwelling or unattached structure and occupies not more than twenty-five percent (25%) of the gross ground floor area of all structures thereof; and

2. involves no sale of merchandise other than that produced on the premises or merchandise directly related to and incidental to the occupation; and
3. is carried on by the members of the family occupying the dwelling, with no other person employed; and
4. produces no evidence of its existence in the external appearance of the dwelling or premises including but not limited to exterior displays such as signs, or in the creation of offensive noise, vibration, smoke, dust, odors, heat or glare, or other nuisances to a degree greater than normal for the neighborhood; and
5. does not generate pedestrian or vehicular traffic beyond that which is normal in the neighborhood in which it is located; and
6. meets the requirements of the Building Inspector and fire district of jurisdiction; and
7. requires no addition or extensions to, or structural, electrical or plumbing alterations in the dwelling; and
8. limits the activity to the hours between 7:00 a.m. and 10:00 p.m.; and
9. has no more than one (1) home occupation permit per dwelling unit; and
10. will not create any electrical disturbance or interference including radio and TV reception which would adversely affect the operation of any equipment located in any other dwelling unit or on property not owned by the person conducting said home occupation; and
11. involves no equipment other than that customarily used in dwellings except that the Planning Commission may, in particular cases, modify the provisions above for locations in outlying communities; and
12. shall exclude, but such exclusion shall not be limited to the following: hospitals, sanitariums, antique shops, eating establishments, bakeries, beauty parlors, barber shops, kennels, commercial stables, real estate offices, veterinary offices and animal hospitals.

Zone Change and General Plan Amendment: The Zoning Ordinance may be amended as other ordinances are adopted or amended, except that; regulations may be amended by changing the boundaries of zones, by changing property from one zone to another, by imposing regulations not heretofore imposed, and by removing or modifying adopted regulations whenever the public necessity, convenience, and welfare require such amendment, in accordance with the procedures set forth in the Zoning Ordinance, or by action of the Planning Commission, or the City Council.

General Plan amendments may only be initiated by the City Council based upon a recommendation by Motion of the Planning Commission or requested by members of the public. Applications by the public are submitted on forms provided by the Planning Department. Fees are established by the City Council.

All amendments must follow the procedures outlined in the California Government Code. An amendment to the General Plan constitutes a project under the California Environmental Quality Act (CEQA) and, therefore, must be evaluated for its effect on the environment. In addition, proposed amendments should be referred to all interested government agencies for comment prior to adoption. As with adoption of General Plan elements themselves, a legally noticed Public Hearing is required before both the Planning Commission and City Council prior to adoption of any plan amendment. Any changes made by the City Council must have been considered previously by the Planning Commission, or the City Council must refer the amendment back to the Commission for its consideration and report.

The Lot Line Adjustment process is intended solely for adjustments in the boundary lines between two or more parcels in instances where no additional parcels are created. This process may also be used to dissolve property lines.

Due to the relatively simple nature of lot line adjustments, applications may be handled administratively (i.e. principally the City Engineer and City Planner) in order to expedite processing. Referral to the Planning Commission and City Council is not required, except in instances of an appeal of an administrative determination, in which case the application will be referred to the Planning Commission.

The Subdivision process and procedures apply to all applications for land division governed by the City of Ferndale Subdivision Ordinance, including Parcel Maps and Tentative Subdivision Maps. Requirements for Tentative Subdivision Maps and requirements for Final and Parcel Maps are described in the Application Process. Requirement checklists for tentative and parcel/final maps are also included, as well as a timeline.

Tentative Parcel Maps require consideration by the Planning Commission only, except where public dedications are offered or when action is appealed to the City Council. Tentative Subdivision maps are considered by the City Council, following advisory action by the Planning Commission.

Government Code Section 66464. A legislative body of a city or county (or advisory agency (i.e. Planning Commission)) shall deny approval of a tentative map if it makes any of the following findings:

1. That the proposed map is not consistent with applicable general and specific plans.
2. That the design or improvement of the proposed subdivision is not consistent with applicable general and specific plans.
3. That the site is not physically suitable for the proposed density of development.
4. That the site is not suitable for the type of development.
5. That the design of the subdivision or the proposed improvements is likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat.
6. That the design of the subdivision or the type of improvements is likely to cause serious public health problems.
7. That the design of the subdivision or the type of improvements will conflict with easements, acquired by the public at large, for access through or use of, property within the proposed subdivision.

Plan Check for a Single Family Residence is an administrative approval process. The plans are reviewed by the City Planner for land use issues, and by the Plan Checker for construction issues. As noted elsewhere, the plan check process is about a week.

Applications for Design Review of minor changes or additions to buildings and structures so as to change the outward appearance of the building, including changes in exterior paint color are reviewed by the Design Review Coordinators (three members of the Planning Commission) who may approve applications without full Planning Commission approval. Two of the three coordinators need to approve the Design Review permit before a building permit can be issued. If two of the coordinators decline to sign a use permit – design review, the application will be placed on the agenda of the next Planning Commission meeting. That being said, the Planning Commission

is currently researching guidelines for design review and anticipates changes to the Zoning Ordinance to better explain the criteria used by the Design Review Coordinators.

The Plot Plan Review is performed by the in-house Planner and generally takes no more than a day. The Planner prepares a memo for the file and for the plan checker outlining any land use issues discovered during the review.

The Sewer Hookup Fee and the Drainage Fee are assigned administratively by the City Clerk before the building permit is issued.

As noted previously, changes in the review process and personnel has lowered the turn-around time on building permits, and also lowered the cost; due to the relatively small number of permits applied for in Ferndale, the City’s processing and permit procedures have effectively been reduced to about a week including building plan review, plot plan review, and design review.

Table 33: Timelines for Permit Procedures - City of Ferndale

Type of Approval or Permit	Typical Processing Time
Conditional Use Permit	30-60 days
Zone Change	60-90 days
General Plan Amendment	60-90 days
Plot Plan Review	7 days
Plan Check	7 days
Design Review	7 days
Tract Maps / Major Subdivision	90 days
Parcel Maps / Minor Subdivision	90 days
Initial Environmental Study	30-60 days
Environmental Impact Report	90-180 days
Source: Local Building and Planning Departments	

Single-family dwellings are the most common building permit requests. As Ferndale reaches its maximum capacity, infill in the form of Second Dwellings and multi-family dwellings will increase.

During floods and earthquakes, emergency shelter for humans and livestock has traditionally been offered at the Fairgrounds. When Ferndale experienced the '92 Earthquake, temporary trailers were set up at the Fairgrounds for more permanent housing.

In our zoning Ordinance, a Farm Dwelling is defined as a dwelling on farm premises for permanent residents of the farm, such as the owner, lessee, foreman, or others whose principal employment is the operation of the farm, as distinguished from quarters for seasonal labor.

Single-family dwellings are principally permitted in all the residential zones, as are two-family dwellings in the R-2 zone. Although multiple dwellings up to four-family are allowed in the R-3 zone, and boarding houses in the R-4 zone, at this time Ferndale does not have any land zoned R3, and a very small section zoned R4. Use Permits and Conditional Use Permits are heard before the Planning Commission. Requests for Secondary Dwelling Units require a use permit, and are approved ministerially (by the City Planner) in either the Residential Suburban or Residential Single Family zones.

Table 34: Housing Types Permitted by Zoning District - City of Ferndale

Housing Types Permitted	R1	R2	R3	R4	RS
Single Family Attached	P	P	P	P	P
Single Family Detached	P	P	P	P	P
Duplexes to Fourplexes	No	P-2	P-4		No
Multifamily (5+ Units per Structure)	No	No	No	No*	No
Mobile Homes**	P	P	P	C	P
Manufactured Homes	P	P	P	P	P
Second Units	C	No	No	No	C
Source: Local Zoning Code Notes: P = Permitted Use C = Conditional Use Permit					

* Although the R4 zone is named Apartment-Professional, neither the principal permitted uses nor the Uses permitted with a Use Permit include apartments or anything for 5+ units. In other words, there are no places in Ferndale where 5+ multifamily apartment units are allowed.

** Mobile Homes on individual lots: A mobile home shall be permitted on an individual lot as a single-family dwelling unit, only if it meets the following requirements: The mobile home must be certified under the National Mobile Home Construction and Safety Standards Act of 1974; The mobile home must be installed on a permanent foundation system designed in accordance with the provisions of Chapter 29 of the Uniform Building Code, 1979 Edition, or applicable provisions of subsequent editions adopted for use by the City; The mobile home must comply with all development standards specified in the zone in which the mobile home is to be placed; The mobile home must be located within an area of the City determined to be compatible with mobile home use.

Compatibility: Mobile homes shall be considered compatible in those areas outside of the Design Control Combining or -D Zones, as particularly described on the Zoning Map of the City of Ferndale. The Design Control districts designated on said map have been found to be both of significant historical value and of overall unique architectural character, warranting protection of preservation efforts and infill development of comparable nature. Therefore, mobile homes, as defined here, are not found to be compatible with these areas, but shall be permitted in all other areas of the City where single-family dwellings are a principal permitted use of land.

Constraints on Persons with Disabilities

Analysis

Government Code §65583(a)(4) requires an analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels and for persons with disabilities, including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures. The analysis shall also demonstrate local efforts to remove governmental constraints that hinder the locality from meeting its share of the regional housing.

The 2000 Census notes a total of 383 persons with a disability, including 159 individuals 65 years of age or older. This represents 27.7 percent of the total population in the City. In all probability not all

of these individuals experience difficulties in finding and maintaining adequate housing; however, those who do deserve to be well attended and their housing needs addressed.

Table 35: Persons with Disabilities by Type and Age – Ferndale

	Number	Percent
<i>Total Disabilities Tallied</i>	383	100.0%
<i>Total Disabilities for Ages 5-64</i>	224	58.5%
Sensory Disability	14	3.7%
Physical disability	71	18.5%
Mental disability	47	12.3%
Self-care disability	17	4.4%
Go-outside-home disability	25	6.5%
Employment disability	50	13.1%
<i>Total Disabilities for Ages 65 and Over</i>	159	41.5%
Sensory Disability	26	6.8%
Physical disability	47	12.3%
Mental disability	20	5.2%
Self-care disability	27	7.0%
Go-outside-home disability	39	10.2%
Source: Census Bureau (2000 Census SF 3: P41)		

The City of Ferndale currently has no procedure for individuals with disabilities to make requests for reasonable accommodation with respect to zoning, permit processing, or building laws. No requests for such have been received since 1999 when records began to be kept for requests of this nature.

Private institutions, which would cover group homes, are permitted with a use permit in all residential zones, except the Residential One Family Zone (R1). The Zoning Ordinance defines family as: A person living alone, or two (2) or more persons related by blood, marriage or adoption, or a group of not more than five (5) unrelated persons living together as a single non-profit housekeeping unit in a dwelling unit, as distinguished from a group occupying a boarding house, motel, hotel or fraternity or sorority house. A family shall be deemed to include necessary servants. This definition is restrictive in allowing a residential care facility in a single-family zone unless limited to five unrelated persons.

Group homes or “Private Institutions” are not allowed in the Neighborhood Commercial or C1 Zone, although “Boarding Houses” and “Mobile Home Parks” are permitted with a use permit. In the Community Commercial or C2 Zone, both “Boarding Houses” and “Mobile Home Parks” are principally permitted.

The City of Ferndale does not restrict the siting of group homes.

In an effort to bring the city’s sidewalks and curb corners up to date, any sidewalk replacement in the city must be ADA compliant. During the walking tour, intersections were identified that need ADA corners, and these have been entered in a request for funding using Transportation Funds. ADA requires one handicap-parking stall for up to 25 parking spaces where parking is provided for the public, guests, or employees.

Residential parking standards for persons with disabilities are the same as other parking standards. There is no policy or program for the reduction of parking requirements for special needs housing if a project proponent can demonstrate a reduced need for parking.

The Land Use Element does not deal with or regulate the siting of special need housing in relationship to one another.

The City of Ferndale allows group homes (greater than 6 people) in the R4 Zone and the C2 Zone as a principally permitted use. The C1 Zone allows a group home with a use permit. Private institutions are allowed with a use permit in the R2, R3, and R4 zones. Only those zones requiring a use permit for a group home would go through a public hearing at the Planning Commission level. There are no particular conditions for group homes that will be providing services on-site.

Analysis of Non-Governmental Constraints

The ability to address the underserved needs of the citizens of the City of Ferndale is challenging, especially since so many of the impediments to providing services are beyond the scope of municipal governments. Funding limitations exist at all levels.

All resources needed to develop housing in Ferndale are subject to the laws of supply and demand, meaning that these resources may not always be available at prices that make housing development attractive. Thus, cost factors are the primary non-governmental constraint upon development of housing in Ferndale. This is particularly true in the case of housing for low- and moderate-income households, where the basic development cost factors such as the cost of land, required site improvements, and basic construction are critical in determining the income a household must have in order to afford housing.

Land Costs

The cost of raw, developable land has a direct impact on the cost of a new home and is, therefore, a potential non-governmental constraint. The higher the raw land cost, the higher the price of a new home. Normally, developers will seek to obtain City approval for the largest number of lots obtainable on a given parcel of raw land. This allows the developer to spread the costs for off-site improvements over the maximum number of lots. Currently, a 60' x 100' lot will sell for about \$125,000.

Construction Costs

The costs of labor and materials have a direct impact on the price of housing and are the main components of housing costs. Residential construction costs vary greatly depending upon the quality, size, and the materials being used. In 2005, residential construction costs are on average \$150 to \$200 per square foot. These costs have risen remarkably in the last year.

Financing Availability

An important consideration in the assessment of the housing needs in Ferndale is the availability of financing. This issue raises several concerns: the ability of homebuilders to obtain construction financing, the ability of households to obtain single-family home loans, and the opportunity for all households of similar economic characteristics to have equal access to financing.

CDBG and HOME funding is not available in Ferndale at this time due to the absence of an accepted Housing Element. Six-Rivers Bank assists mid to low income homebuyers who may have trouble qualifying for a loan. However, this type of financing works best with a local down payment assistance program, for which Ferndale does not qualify.

Units At-risk of Converting to Market Rate Uses

According to California Housing Partnership Corporation (CHPC) and USDA Rural Development, there are no State or Federally assisted units in Ferndale at risk of converting to market rate uses in the planning period. Further, there are no locally assisted units at risk of converting to market rate uses in the planning period.

Energy Conservation

The purpose of this analysis is to ensure localities consider the long- and short-term benefits of energy conservation in residential development, including how energy conservation requirements can contribute to reducing overall development costs and monthly payments for households.

Major Subdivisions in Ferndale are required to provide a solar-shading map to assist lot purchasers and homebuilders to site their homes to make best use of the sunshine in our sometimes cold coastal community.

Pacific Gas and Electric Company, our regional utility company, has several programs that help homeowners and renters with energy conservation. Pacific Gas and Electric Company's customers have expressed great interest in being part of the solution to the energy situation in California. The utility has developed a simple 3-step program to make saving energy easy.

Customers can reduce energy consumption if they utilize the information and incentives available for:

1. Taking **no-cost**, energy-saving actions.
2. Installing **low-cost**, energy-saving measures.
3. **Investing** in energy-efficient equipment, appliances and building shell retrofits.

In addition, “Energy Partners” is Pacific Gas and Electric Company’s free weatherization program. Utility-approved contractors work with low-income customers to make their homes more energy efficient.

On a local level, the Redwood Coast Energy Authority (RCEA) was formed in 2003 as a Joint Powers Association, representing seven municipalities including the Cities of Arcata, Blue Lake, Eureka, Ferndale, Fortuna, Trinidad and Rio Dell, and Humboldt County. RCEA's purpose is to develop and implement sustainable energy initiatives that reduce energy demand, increase energy efficiency, and advance the use of clean, efficient and renewable resources available in the region.

Chapter Four: Review and Revise

The review and revise requirement is an important feature of the housing element update. The review should analyze the Community's accomplishments over the past planning period. This information provides the basis for continuing to develop a more effective housing program.

Below are the **PROGRAMS** and *Policies* from our previous Housing Element, along with Progress, Effectiveness and Appropriateness.

PROGRAM 1: The City will develop and adopt procedures for the implementation of the State requirement for granting of density bonuses or other incentives of equal value for projects that include specified percentages of units affordable to low and moderate-income households.

Policy: All density bonuses for developments containing at least 25 percent of the units for low or moderate income households or at least 10 percent of the units for lower-income households as provided in GC §65915, and where consistent with local regulations.

Policy: Encourage self-help housing development.

Progress: The City has not adopted a procedure for the implementation of the State requirement for granting density bonuses or other incentives for projects that include specified percentages of units affordable to low and moderate-income households. There have been no inquiries regarding density bonuses from developers.

Effectiveness: Now that the City has a City Manager and an in-house Planner, a Density Bonus Ordinance will be developed within one year.

Appropriateness: With a City Manager and in-house Planner, there is follow-up on programs.

PROGRAM 2: The City will continue to allow creation of secondary residential units in residential suburban and other single-family residential zoned areas, consistent with local regulations.

Policy: The City will continue to allow development of secondary residential units on existing residentially developed lots in accordance with the requirements of Government Code §65852.2, and where consistent with local regulations.

Progress: In compliance with State Law (G.C. §65852.2), the City of Ferndale adopted Ferndale's Secondary Dwelling Unit (SDU) Ordinance 03-03, which was enacted July 14, 2003.

Effectiveness: SDU Ordinance 03-03 states that an approved Secondary Dwelling Unit permit application shall be obtained prior to construction, conversion and/or

development of a Secondary Dwelling unit. Pursuant to California G.C. §65852.2 the Secondary Dwelling Unit permit shall be considered ministerially without discretionary review or a hearing.

Appropriateness: After a six month period of amnesty for illegal Second Dwelling Units, all subsequent SDU applications have been dealt with through the City Planner, without going to the full Planning Commission, as long as all the parameters of the Ordinance had been met.

PROGRAM 3: The City will revise its zoning ordinance to authorize mobile home parks in single family residential zones subject to a use permit as required by Government Code §65852.72.

Policy: Allow development of single mobile homes and mobile home parks in residential zones in accordance with the requirements of Government Code §§65852.3 and 65852.2, and where consistent with local regulations.

Progress: Ferndale’s Zoning Ordinance 02-02 was codified and enacted July 8, 2002 without revising it to authorize mobile home parks in single-family residential zones subject to a use permit.

Effectiveness: GC §65852.72 is not available online. The law may have changed. Housing & Community Development advised Government Code 65852.3 pertains to “manufactured” homes.

Appropriateness: There is currently sufficient property available in C1 and C2 zones to allow mobile homes without opening up residential zones. The Zoning Ordinance will have to be revised to deal with “manufactured” vs “Mobile” homes.

PROGRAM 4: The City will seek funding from Federal and State sources to initiate a housing rehabilitation loan and grant program for eligible units.

Policy: Make maximum use of Federal and State funding programs in the rehabilitation of housing for lower income households.

Policy: Encourage compliance with State and local building codes in conjunction with the availability of federal and state programs for rehabilitation.

Policy: Use state and federal funding assistance to the extent these subsidies exist and are needed to develop affordable housing in Ferndale.

Policy: Pursue those housing finance programs that do not require Article 34 Referendum.

Policy: Encourage the development of the local capacity to package federal and state loans and grants.

Policy: Encourage the formation of a local non-profit housing sponsor to make maximum use of Federal and State Programs for new housing construction and rehabilitation. The non-profit housing sponsor will assist the City with preparation of a strategy for development of affordable housing in Ferndale.

Policy: Assist developers in taking full advantage of state and federally funded programs, when feasible.

Progress: Ferndale's Housing Element revision in 1992 was reviewed by the Housing and Community Development Department. The Department made several requests for alterations, which were never dealt with. When the current planner began on March 1, 2002, she worked with HCD to develop a loan and grant program, but was unable to obtain funding because of the lack of an approved Housing Element.

Effectiveness: As mentioned above, without an approved Housing Element, Ferndale is not eligible for funding.

Appropriateness: With a City Manager and in-house Planner, there is follow-up on programs. There has been a push from the City Council to get the Housing Element completed, and staff has been allotted extra time to finish it.

PROGRAM 5: The City will post and make available information on the Enforcement program of the State Fair Employment and Housing Commission.

Policy: Promote the enforcement activities of the State Fair Employment and Housing Commission.

Progress: The City has posted information on the Enforcement program of the State Fair Employment and Housing Commission on the employee bulletin board; however, over-the-counter information has not been made available.

Effectiveness: As noted above, over-the-counter information has not been made available; however, Housing and Community Development has sent information to me, which will be posted and available to the public.

Appropriateness: With a City Manager and in-house Planner, there is now follow-up on programs.

PROGRAM 6: The City will post and make available information on currently available weatherization and self-help housing programs.

Policy: Promote the use of energy conservation features in the design of all new residential structures.

Policy: Promote the use of weatherization programs for existing residential units, including the programs operated by Pacific Gas and Electric Company and the Redwood Community Action Agency.

Progress: Pacific Gas & Electric, along with the Redwood Community Action Agency, continues to make available information on currently available weatherization and self-help housing programs.

Effectiveness: Many houses in the Ferndale area have been weatherized. According to the Redwood Community Action Agency, they do not give out information on who has used their weatherization program. Individuals call them and if they meet the income criteria, they are put on a list, and their houses are weatherized within 30 days.

Appropriateness: Because weatherization programs in the county are run by both PG&E and the non-profit Redwood Community Action Agency, it is difficult for the city to obtain actual numbers, therefore, difficult to quantify.

PROGRAM 7: The City will maintain and update, on a regular basis, information on vacant land, building permit activity and housing conditions.

Policy: Develop and update on an annual basis an accurate and current inventory of the City's housing stock, building permit activity and vacant land.

Policy: Encourage the development of presently available vacant and under-utilized parcels served by sewer and water to full potential under the zoning ordinance.

Progress: As noted previously, the city has just recently completed an inventory of the City's housing stock and vacant land. Building Permit activity is tracked on a list of all building permits issued since 1975. Land Use Permits and Building Permits are all filed under the street address, which has been helpful in finding information about properties.

Effectiveness: With the walking survey completed for this Housing Element Update, the City now has a current inventory of vacant land and housing conditions. The City has an up-to-date list of all building permits issued and final inspection dates. This information can be used as a baseline to compare subsequent improvements.

Appropriateness: The new filing system which includes all permits issued to properties has been very effective in following improvements to each property. With the housing condition inventory, the city will be able to identify all houses needing work.

PROGRAM 8: The City will continue to pursue Federal and State funding for improvements to drainage and sewer facilities to alleviate existing deficiencies and minimize potential health and safety problems.

Policy: Minimize housing construction in environmentally hazardous areas.

Policy: Seek Federal and State funding for improvements to and expansion of sewer and drainage facilities throughout the City.

Policy: Prepare a city-wide drainage master plan and drainage impact fee ordinance.

Progress: A number of ordinances and an Updated Drainage Master Plan have been adopted by the City Council to deal with improvements to drainage and sewer. Currently, the City Council is considering a sewer rate increase to cover the cost of a new Sewage Treatment Plant. Grant Funding is being explored to help with the costs.

Effectiveness: In order to minimize construction in areas where flooding occurs, the City of Ferndale adopted Ordinance 315, enacted March 4, 1991, which encourages flood damage prevention. Ordinance 94-01, enacted February 3, 1994 establishes requirements for drainage facility improvements and drainage fees in the Ferndale Drainage area. An updated Drainage Master Plan (DMP) was adopted by the City Council on April 1, 2004. The DMP sets out the City Council's plan for the next ten years to deal with specific areas of concern for drainage issues. Ordinance 03-05 is an ordinance regulating the use of public sewers and drains, the installation and connection of building sewers, sewer laterals and public sewer main extensions; enacted April 4, 2004. The Sewer Fee Ordinance 04-03 became law on May 1, 2004.

Appropriateness: The City Council continues to direct staff to update ordinances and explore funding opportunities to complete the new Sewer Treatment Facility.

PROGRAM 9: The City will examine the zoning regulations of multi-family zones to determine if the reclassification of lower density areas are needed.

Policy: Monitor market demand for residential land and consider, where appropriate, changes in the City's General Plan Land Use Element and Zoning to ensure a balance in residential uses and densities.

Progress: The City has not examined the zoning regulations of multi-family zones to determine if the reclassification of lower density areas are needed.

Effectiveness: As soon as the Housing Element is completed, staff will continue to update and revise the entire General Plan. Density ranges are determined in the General Plan Land Use Designations.

Appropriateness: With a City Manager and in-house Planner, there is follow-up on programs. The Planning Commission and City Council recognize the need for an up-to-date General Plan.

PROGRAM 10: The City will revise its zoning ordinance to incorporate changes to G.C. §65852.3 relating to manufactured housing on single-family lots.

Progress: The City has not specifically prohibited manufactured housing. As long as the manufactured house fits into the development criteria, and is not in a design review zone, the manufactured house would be allowed.

Effectiveness: The City has not specifically prohibited manufactured housing in the Zoning Ordinance. As long as the manufactured house fits into the development criteria, the manufactured house would be allowed.

Appropriateness: Because the city does not specifically prohibit manufactured homes, it is unnecessary to spell this out in the Zoning Ordinance.

PROGRAM 11: The City will work with local community members to establish a non-profit housing assistance corporation of sponsor housing programs in Ferndale.

Progress: The City has not joined with community members to establish a non-profit housing assistance corporation.

Effectiveness: Lack of state and federal funding due to a non-compliant Housing Element has stymied this program.

Appropriateness: Over and over again, the city has not qualified for grant funding because of a non-compliant Housing Element. The City Manager and City Planner will continue to work towards compliance with the General Plan.

PROGRAM 12: The City will make modifications to its building regulations: (1) to insure that handicapped access is provided in all new housing development; (2) and to adopt the State Historical Building Code for use in the rehabilitation of eligible structures.

Policy: Give special consideration in housing programs to the needs of special groups, including the handicapped, large families, the elderly and families with low incomes.

Policy: Promote handicapped access in new housing development.

Policy: Allow for the use of the State Historical Building Code for rehabilitation of eligible units.

Progress: The City has not modified its building regulations to insure that handicapped access is provided in all new housing developments; however, all sidewalks and street corners in new developments are required to be ADA compliant.

The City of Ferndale is listed as California Landmark No. 833. This listing qualifies any building within the City of Ferndale to be considered "Historical." At the request of the owner, buildings are considered by the Planning Department on a

case-by-case basis. If a building were deemed “historic” they would be eligible to use the State Historic Building Code.

Effectiveness: As stated above, all sidewalks and street corners in new developments are required to be ADA compliant. At the request of the property owner, any building in Ferndale will be evaluated for eligibility to use the State Historic Building Code.

Appropriateness: More research should be done to consider whether the entire town should be evaluated for eligibility to be considered “Historic.” If a building is considered “historic”, certain limitations should be considered on “modernization” of the building.

PROGRAM 13: The City will encourage renters/tenants to make maximum use of Federal rent subsidies as administered by the Humboldt County Housing Authority.

Policy: Support equal access to housing.

Progress: Because Humboldt County is so sparsely populated, the Eureka Housing Authority handles the City of Eureka, as well as the rest of Humboldt County in administering Federal Rent Subsidies.

Effectiveness: According to the Eureka Housing Authority, only those people who are eligible for Section 8 funding would receive Federal Rent Subsidies. The general director of the authority advises that Ferndalers avail themselves of the rent subsidies.

Appropriateness: The City of Ferndale will continue to refer renters who need help to the Eureka Housing Authority

MISCELLANEOUS POLICIES:

Policy: Encourage compatible mixed-use of commercial/residential development in the downtown area.

Progress: Through the current Zoning Ordinance, the City already encourages mixed-use in the downtown or commercial area. If the Zoning Ordinance were to be re-written, the City should look at the SMART GROWTH ideals being adopted in other California Cities.

Effectiveness: After the acceptance of the Housing Element, the City Planner will make a presentation to the City Council on the SMART GROWTH ideals to gather support of a Zoning Ordinance re-write.

Appropriateness: Continue to monitor and encourage mixed-use of commercial / residential development in the downtown area.

Policy: Require rehabilitation or abatement of unsafe structures, after giving property owners ample notice and opportunity to correct deficiencies.

Policy: Encourage private rehabilitation of housing.

Progress: A Housing Condition survey has recently been completed identifying those houses most in need of rehabilitation or abatement of unsafe structures.

Effectiveness: Nuisance Ordinance 01-01, enacted May 9, 2001, sets out definitions pertaining to Real Property Maintenance, notification procedures, abatement, as well as penalties, cost recovery and liens.

Appropriateness: Now that a Housing Condition Survey has been completed, the City should identify those houses needing rehabilitation, and either notify each to rehabilitate their properties using the Nuisance Ordinance for procedures and definitions, or provide funding for those property owners who cannot afford to rehabilitate their homes.

Chapter Five: Summary of Conclusions

Housing element law essentially consists of two main components guiding the preparation of the housing element: analysis of housing needs, resources and constraints, etc. (Government Code Section 65583(a)) and housing programs (Government Code Section 65583(c)). A meaningful housing element could strongly reflect your community's needs by drawing a tight connection between the analysis of housing needs and housing programs. Particularly, the element could summarize housing needs, resources and constraints' findings as part of the required analyses, along with proposed alternatives for remedies and fold those results with what was learned from the review of the last housing element (i.e., appropriateness). The combination of a housing needs summary synthesized with what was learned from the past planning period can provide a meaningful framework for developing the housing program or strategy in the current planning period.

Table 36: Summary of Conclusions

Category	Statement	Need
Population	For all age groups below 44 years of age, Ferndale percentages run below state figures. Because of the cost of real estate in Ferndale, younger families might be less able to afford to live in here. Ferndale's ethnic makeup is predominantly white.	Help for First Time Homeowners Supply fair housing information throughout the city
Employment	Technology dependent activities including consulting, design, and computer support are a growing segment of the local economy.	Support for Home Based Businesses and Long Distance work offices
Income	Relative to Humboldt County or the State of California, fewer Ferndale residents fall within the two lowest income categories.	Low Income Housing
Seniors	Seniors in Ferndale make up 16.6 percent of the population, higher than the Humboldt County percentage.	Senior Housing for when our Seniors can no longer live in their homes
Female-headed Households	In Ferndale, there were 51 female-headed households, according to the 2000 Census. Of these 51 female-headed households, nine were below the poverty level, which is 52.9 percent of the 17 families found under the poverty level according to the 2000 Census.	Assistance for low-income, single heads of household
Persons with Disabilities	Residential parking standards for persons with disabilities are the same as other parking standards. There is no policy or program for the reduction of parking requirements for special needs housing if a project proponent can demonstrate a reduced need for parking.	Policy for parking standards for persons with disabilities.
Group Homes	The Land Use Element does not deal with or regulate the siting of special need housing in relationship to one another.	Policy dealing with group homes

Category	Statement	Need
Households Overpaying	In 2000, approximately 154 households (29.7 percent) reporting to the 2000 census were in overpayment situations. This incidence of overpayment occurs fairly evenly between owner (54%) and renter (46%) households. Further, of the 236 households reporting incomes less than \$35,000, approximately half were overpaying in 2000.	Rental Assistance; additional low to moderate income houses
Housing Units by Type	The proportion of single-family units increased significantly since 1990, while the proportion of 5+ unit-housing structures (i.e., multifamily) has decreased in the City of Ferndale.	Additional Multi-Unit Construction
Government Constraints	Ferndale's Zoning Ordinance should be amended to allow for persons with disabilities, emergency shelters, transitional housing and employee housing. A Density Bonus Ordinance would increase the availability of permanent housing for all community residents.	Allow for persons with disabilities, emergency shelters, transitional housing and employee housing. A Density Bonus Ordinance is needed.
Vacancy	HUD standards indicate that a vacancy rate of five percent is sufficient to provide choice and mobility. The homeowner vacancy rate was 1.8 percent, and the rental vacancy rate was 3.8 percent.	More housing
Housing Condition	Many Housing Elements use age of housing stock to infer condition and need for rehabilitation. This approach is not totally valid in Ferndale, which is noted for its historic architecture. However, minor to substantial rehabilitation is needed on 30% of the housing stock	A rehabilitation program
Land Use Controls	In Ferndale, land use designations provide for a range of residential densities ranging from one residence per acre to 21 residences per acre. The Zoning Ordinance does not clearly define design review criteria, nor is there mention of historical preservation.	Encourage multi family dwellings. Research Historical Preservation Define Design Review criteria.
Realistic Capacity	Because of the Water Quality Control Board's Cease and Desist Order, Ferndale faces a sewer hookup moratorium until a new wastewater treatment plant is constructed	Construct a new wastewater treatment plant.
Land Costs	Cost factors are the primary non-governmental constraint upon development of housing in Ferndale. This is particularly true in the case of housing for low- and moderate-income households, where the basic development cost factors such as the cost of land, required site improvements, and basic construction are critical in determining the income a household must have in order to afford housing.	Offer incentives to developers / contractors to build multiple dwellings.
Financing Availability	CDBG and HOME funding is not available in Ferndale at this time due to the absence of an accepted Housing Element. Six-Rivers Bank assists mid to low income	Develop a First Time Buyer and Female Heads of Household financing

	homebuyers who may have trouble qualifying for a loan. However, this type of financing works best with a local down payment assistance program, for which Ferndale does not qualify.	program. Apply for and income/rent study help. Housing Rehab program.
Housing Types	Although the R4 zone is named Apartment-Professional, neither the principal permitted uses nor the Uses permitted with a Use Permit include apartments, or anything for 5+ units. In other words, there are no places in Ferndale where apartments are allowed.	Zoning Ordinance Amendment to include apartment dwellings and a Rezone to include R3 zones at some time in the future.

Chapter Six: Housing Program

The purpose of this section is to formulate a housing program that will guide the City of Ferndale and all of its housing stakeholders toward the preservation, improvement and development of housing for all economic levels. It is the City’s intent to create a municipal climate that encourages quality, varied, affordable housing development by both the public and private sectors. The following program includes goals, objectives and programs that will form the foundation for specific activities.

Goals are general statements of values or aspirations held by the community in relation to each issue area. They are the ends toward which the jurisdiction will address its efforts.

Policies are more precise expressions of the community’s position on particular issues, or how particular goals will be interpreted or implemented. Policies may include guidelines, standards, objectives, maps, diagrams, or a combination of these components.

Implementing **Programs** present specific actions that the city or other identified entity will undertake to address policy issues and move closer to the community’s goals. These might include ongoing programs sponsored by the city (a rehab loan program) discrete time-specific actions (adopt an ordinance or establish a housing trust fund), or further planning action (e.g. develop a specific plan)

Quantified **Objectives** establish short-range targets to achieve the goals by identifying the max number of housing units by income category that can be constructed, rehabbed and conserved over the five-year period. They should represent realistic yet aggressive targets that will guide program implementation and serve as the basis for ongoing monitoring and evaluation.’

Table 37: Housing Program

Goals	Policies	Implementing Programs	Quantified Objectives
<p><u>Adequate Sites Program</u> Goal: Provide sites for all types of residential dwellings.</p>	<p>Preserve existing Ordinances that allow multi-use in various zones.</p>	<p>Amend zoning ordinance to allow for apartments. . Amend Zoning Ordinance to deal with “manufactured” vs “mobile” homes. Rezone during this planning period to include R3 and R4 zones for multi-family dwellings. Multi-family dwellings will be principally permitted.</p>	<p><i>Responsible Agency:</i> Planning Department <i>Numerical Objective:</i> 11 <i>Funding Source:</i> City Council Budget <i>Completion Dates and Milestones:</i> Amend Zoning Ordinance re this objective by 2006; Rezone for R3 and R4 principally permitting multi-family dwellings in this Housing Element timeframe, by 2010.</p>
<p><u>Adequate Sites Program</u> Goal: Provide sites for all types of residential dwellings</p>	<p>Change Ordinances to allow multi-use in various zones, and expand upon uses.</p>	<p>Amend zoning ordinance to allow for emergency shelters, transitional housing and employee housing per Health and Safety Codes Sections 17021.5 and 17021.6.</p>	<p><i>Responsible Agency:</i> Planning Department <i>Numerical Objective:</i> 7 <i>Funding Source:</i> City Council Budget <i>Completion Dates and Milestones:</i> Amend</p>

<u>Goals</u>	<u>Policies</u>	<u>Implementing Programs</u>	<u>Quantified Objectives</u>
			Zoning Ordinance re this objective by 2006
<u>Programs to Assist in the Development of Housing for Low- and Moderate-Incomes</u> Goal: Increase the availability of permanent housing for all community residents	Adopt a Density Bonus Ordinance	Develop and present a Density Bonus Ordinance to the City Council per GC Section 65915	<i>Responsible Agency:</i> City Manager, City Planner <i>Numerical Objective:</i> 4 <i>Funding Source:</i> CDBG, FTHAP <i>Completion Dates and Milestones:</i> By the end of 2006.
<u>Programs to Assist in the Development of Housing for Low- and Moderate-Incomes</u> Goal: Increase the availability of permanent housing for all community residents	Commit to reach out to the community.	Annually contact and meet with developers of housing for lower-income households, assist with site identification and entitlement processing, support funding application.	<i>Responsible Agency:</i> City Manager, City Planner <i>Numerical Objective:</i> 13 <i>Funding Source:</i> City Council <i>Completion Dates and Milestones:</i> By the end of 2007.
<u>Programs to Assist in the Development of Housing for Low- and Moderate-Incomes</u> Goal: Increase the availability of permanent housing for all community residents	Explore financing alternatives to promote low-income housing in new development projects. Encourage in-fill	Apply for CDBG funding. Implement the Federal HOME first time homebuyers assistance program (FTHAP)	<i>Responsible Agency:</i> City Manager, City Planner <i>Numerical Objective:</i> 3 <i>Funding Source:</i> CDBG, FTHAP <i>Completion Dates and Milestones:</i> By the end of 2006.
<u>Programs to Address and Remove Governmental Constraints on Housing</u> Goal: Review and re-write all Ordinances	Continue to rewrite and standardize all city ordinances and post online.	Under Building and Zoning Section, review, consolidate and re-write the Subdivision Ordinance 99-04, Ordinances 68, 307, 308A, and 99-03. Under Infrastructure and Utilities Section, review, consolidate and re-write Ordinances 73, 86, 154, 198, 210, 227, 264, 251, 297, 314, 94-01, 03-05, 04-03, 04-04.	<i>Responsible Agency:</i> Planning Department <i>Numerical Objective:</i> 10 <i>Funding Source:</i> City Council Budget <i>Completion Dates and Milestones:</i> Building and Zoning Section by end of 2006; Infrastructure Section by end of 2007.
<u>Programs to Address and Remove Governmental Constraints on Housing</u> Goal: Develop and define criteria for Design Review.	Research Historical Preservation as well as other cities' criteria for Design Review.	Rewrite the section of the Zoning Ordinance that deals with Design Review so that the Design Review coordinators will have better defined criteria to analyze projects.	<i>Responsible Agency:</i> Planning Department <i>Numerical Objective:</i> 6 <i>Funding Source:</i> City Council Budget <i>Completion Dates and Milestones:</i> By the end of 2006.

<u>Goals</u>	<u>Policies</u>	<u>Implementing Programs</u>	<u>Quantified Objectives</u>
<p><u>Programs to Address and Remove Governmental Constraints on Housing</u> Goal: Lift the Sewer Hookup moratorium</p>	<p>Work toward the completion of the Wastewater Treatment Facility.</p>	<p>Comply with the Waste Discharge Requirements Order R1-2000-0092. As hookups become available, priority will be granted to developments that include housing units affordable to lower income households. (GC65589.7)</p>	<p><i>Responsible Agency:</i> City Manager, City Engineer <i>Numerical Objective:</i> 1 <i>Funding Source:</i> Rate payers <i>Completion Dates and Milestones:</i> *</p>
<p><u>Programs to Address and Remove Governmental Constraints on Housing</u> Goal: Establish a formal reasonable accommodation procedure.</p>	<p>Reduce parking requirements and amend the city's definition of family to better facilitate residential care opportunities.</p>	<p>Rewrite the Zoning Ordinance regarding persons with disabilities and establish reasonable accommodation procedures.</p>	<p><i>Responsible Agency:</i> City Manager, City Engineer <i>Numerical Objective:</i> 8 <i>Funding Source:</i> City Council Budget <i>Completion Dates and Milestones:</i> By the end of 2007.</p>
<p><u>Programs to Address and Remove Governmental Constraints on Housing</u> Goal: Clarify the City's commitment to manufactured homes.</p>	<p>Ensure the Zoning Ordinance meets statutory requirements under GC Section 65852.3</p>	<p>Revise the Zoning Ordinance regarding manufactured homes in residential zones.</p>	<p><i>Responsible Agency:</i> City Manager, City Engineer <i>Numerical Objective:</i> 9 <i>Funding Source:</i> City Council Budget <i>Completion Dates and Milestones:</i> By the end of 2007.</p>
<p><u>Programs to Conserve and Improve Existing Affordable Housing Stock (GC Section 65583(c)(4))</u> Goal: Encourage rehabilitation of older units.</p>	<p>Increase low-income housing stock. Provide funding to applicants to help maintain housing</p>	<p>Adopt a rehabilitation loan program, tenant based assistance, such as Section 8 vouchers and certificates, and efforts to conserve housing such as weatherization programs</p>	<p><i>Responsible Agency:</i> City Manager, City Planner <i>Numerical Objective:</i> 5 <i>Funding Source:</i> State and Federal Government <i>Completion Dates and Milestones:</i> By end of 2007.</p>
<p><u>Programs to Conserve and Improve Existing Affordable Housing Stock (GC Section 65583(b))</u> Goal: Encourage maintenance, preservation, improvement and development of housing.</p>	<p>Apply for CDBG Funding in order to determine income levels of occupants in those houses needing rehabilitation. Apply for funding to maintain, preserve, improve and develop affordable housing</p>	<p>According to Table 26, 205 houses need some form of rehabilitation. Assuming the city is eligible for \$500,000 in grants every two years, we should be able to rehabilitate 27 dwellings in the next five years. At the same time, 6 houses need replacement. It is estimated that we can replace one dwelling in five years.</p>	<p><i>Responsible Agency:</i> City Manager, City Planner <i>Numerical Objective:</i> 2 <i>Funding Source:</i> State and Federal Government <i>Completion Dates and Milestones:</i> By end of 2010, obtain State and Federal Funding to rehabilitate 27 dwellings, and replace 1 dilapidated dwelling. Income levels shall be determined through a study.</p>

<u>Goals</u>	<u>Policies</u>	<u>Implementing Programs</u>	<u>Quantified Objectives</u>
<p><u>Programs to Promote Equal Housing Opportunities for All Persons</u> Goal: Concentrate efforts to increase the availability of permanent housing for all community residents.</p>	Encourage Senior Housing developments	Offer incentives to developers to build senior housing and moderate income housing. Set up a committee to study feasibility of Sr. housing in Ferndale	<p><i>Responsible Agency:</i> City Council, City Manager, City Planner <i>Numerical Objective:</i> 12 <i>Funding Source:</i> Private Developers <i>Completion Dates and Milestones:</i> By end of 2010.</p>
<p><u>Programs to Promote Equal Housing Opportunities for All Persons</u> Goal: Promote equal opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin color, familial status or disability.</p>	Encourage equal housing opportunities per CG Section 65583(c)(5)	Disseminate fair housing information throughout the City in a variety of public locations. Resolve fair housing complaints.	<p><i>Responsible Agency:</i> City Manager, City Planner <i>Numerical Objective:</i> 14 <i>Funding Source:</i> City Council Budget <i>Completion Dates and Milestones:</i> Make information available at the Library and at City Hall by 2008.</p>
<p><u>Programs to Preserve Development At-Risk of Conversion to Market Rate Uses</u> Goal: There are no at-risk of conversion units.</p>	N/A	N/A	<p><i>Responsible Agency:</i> N/A <i>Numerical Objective:</i> N/A <i>Funding Source:</i> N/A <i>Completion Dates and Milestones:</i> N/A</p>

*Task A	By November 1, 2005, comply with Receiving Water Limitations required in Waste Discharge Requirements by implementing short-term solution to increase dissolved oxygen concentrations.
Task B	By December 31, 2005, submit a detailed analysis of the selected long-term effluent disposal alternative. The report shall include a request for any Basin Plan exceptions, as appropriate, as well as detail progress regarding land acquisition, permitting, financing, and construction of the selected alternative.
Task C	By June 1, 2006, submit documentation that the land necessary for the long-term effluent disposal project has been acquired or a long-term lease is secured.
Task D	By August 1, 2006, complete the California Environmental Quality Act (CEQA) process.
Task E	By September 15, 2006, submit 10% design plans and specifications for construction of the effluent disposal project.
Task F	By November 1, 2006, secure funding for the long-term effluent disposal project. Provide the Regional Water Board with documentation regarding the funding source(s).
Task G	By February 1, 2007, submit 50% design plans and specifications for construction of the effluent disposal project.
Task H	By April 1, 2007, submit final design plans and specifications for construction of the effluent disposal project.
Task I	By November 1, 2007, acquire all necessary permits, including Waste Discharge Requirements from the Regional Water Board.
Task J	By August 31, 2008, complete construction of the effluent disposal project.
Task K	By October 1, 2008, attain full compliance with Waste Discharge Requirements by completing the implementation of long-term plans for treated effluent disposal during the wintertime season.

Financial Resources

Statutory Requirements:

The City of Ferndale does not have a redevelopment agency at this time; however HCD administers more than 20 programs that award loans and grants for the construction, acquisition, rehabilitation and preservation of affordable rental and ownership housing, homeless shelters and transitional housing, public facilities and infrastructure, and the development of jobs for lower income workers. **Please note that, with rare exceptions, these loans and grants are not made to individuals**, but to local public agencies, nonprofit and for-profit housing developers, and service providers. In many cases these agencies then provide funds to individual end users. Some of the programs for which Ferndale may be eligible are:

Building Equity and Growth in Neighborhoods Program (BEGIN)

Notice of Funding Availability (\$24 million)

- 17-Mar-05: NOFA Issuance

Reduce local regulatory barriers to affordable ownership housing, and provide downpayment assistance loans to qualifying first-time low- and moderate-income buyers of homes in BEGIN projects. Grants to cities, counties, or cities and counties to make deferred-payment second mortgage loans to qualified buyers of new homes, including manufactured homes on permanent foundations, in projects with affordability enhanced by local regulatory incentives or barrier reductions. Loans by grant recipients at simple interest to qualifying homebuyers, not to exceed 20 percent of home sales price or \$30,000, whichever is less. Note: the HCD BEGIN program does not loan directly to individuals. Second mortgage loans for downpayment assistance to low- or moderate-income first-time homebuyers. Eligible homes must be newly constructed in projects facilitated by local regulatory incentives or barrier reductions, and may include manufactured homes.

CalHome Program

Self-Help Housing Technical Assistance Grants (\$3.9 million)

- 08-Jun-05: NOFA Issuance

Enable low and very-low income households to become or remain homeowners. Grants to local public agencies and nonprofit developers to assist individual households through deferred-payment loans. Direct, forgivable loans to assist development projects involving multiple ownership units, including single-family subdivisions. Grants to local public agencies for first-time homebuyer downpayment assistance, home rehabilitation, including manufactured homes not on permanent foundations, acquisition and rehabilitation, homebuyer counseling, self-help mortgage assistance programs, or technical assistance for self-help homeownership. All funds to individual homeowners will be in the form of loans. Loans for real property acquisition, site development, predevelopment, construction period expenses of homeownership development projects, or permanent financing for mutual housing and cooperative developments. Project loans to developers may be forgiven as developers make deferred payment loans to individual homeowners. Assistance to individual households will be in the form of deferred-payment loans, payable on sale or transfer of the homes, or when they cease to be owner-occupied, or at maturity. Predevelopment, site development, and site acquisition for development projects. Rehabilitation, and acquisition and rehabilitation, of site-built housing, and rehabilitation, repair and replacement of manufactured homes. Downpayment assistance, mortgage financing, homebuyer counseling, and technical assistance for self-help.

California Self-Help Housing Program (CSHHP)

Funds available through CalHome Self-Help NOFA

Fund programs that assist low and moderate income families to build their homes with their own labor. Grants are made to sponsor organizations that provide technical assistance for participating families. Grants for technical assistance program operations. Training and supervision of low and moderate-income self-help homebuilders.

Joe Serna, Jr. Farmworker Housing Grant Program (JSJFWHG)

Single-Family NOFA (\$10 million)

- 19-Nov-04: NOFA Issuance

NOFA for Migrant Farmworker Housing component issued 7 Feb 2003

- 23-May-05: NOFA Amendment

Grants and loans to assist development or rehabilitation of various types of housing projects for agricultural worker households. A match of at least 100 percent is required for the primary JSJFWHG program. Homeowner Grants: Rental Construction Grants or Loans: Rental Rehabilitation Grants or Loans: Activities incurring costs in the development of homeowner or rental housing for agricultural workers, including land acquisition, site development, construction, rehabilitation, design services, operating and replacement reserves, repayment of predevelopment loans, provision of access for the elderly or disabled, relocation, homeowner counseling, and other reasonable and necessary costs.

Multifamily Housing Program (MHP)

General NOFA (General Allocation: \$72 million)

- 22-Aug-05: NOFA Issuance

- 12-Oct-05: Application Deadline

Supportive Housing NOFA (Supportive Housing Allocation: \$50 million)

- 09-Mar-05: NOFA Issuance Date

- 28-Mar-05: Application Submittal Period Opens (Continuous)

- Jun-05: Loan and Grant Committee (continuous)

- Jun-05: Funding Awards (continuous)

Student Housing NOFA (Student Housing Allocation: \$9.72 Million)

- 04-Jun-04: NOFA Issuance

- 20-Apr-05: NOFA Amendment

- 27-Jul-04: Application Submittal (continuous through 30-Jun-05)

- Sep-04: Loan and Grant Committee (continuous)

- Sep-04: Funding Awards (continuous)

Deferred payment loans to assist the new construction, rehabilitation and preservation of permanent and transitional rental housing for lower income households. Loan term: 55 years. Applicants or their principals must have successfully developed at least one affordable housing project.

Predevelopment Loan Program (PDLP)

Notice of Funding Availability (\$3 million)

- 15-Jul-04: NOFA Issuance

• Ongoing, continuous: Applications accepted, reviewed and funds awarded as funds become available
Short-term loans to provide predevelopment capital to finance the start of low income housing projects. Predevelopment costs of projects to construct, rehabilitate, convert or preserve assisted housing, including manufactured housing and mobilehome parks. Eligible costs include, but are not limited to, site control, site acquisition for future low-income housing development, engineering studies, architectural plans, application fees, legal services, permits, bonding and site preparation. Priority will be given to

developments which are rural, located in the public transit corridors, or which preserve and acquire existing government-assisted rental housing at risk of conversion to market rents.

**State Community Development Block Grant (CDBG) Economic Development Allocation:
California Community Economic Enterprise Fund Component**

Notice of Funding Availability (\$5.1 million)

2005/06

- 09-Sep-05: NOFA Issuance
- 18-Nov-05: Application due date
- 06-Feb-06: Award Announcement

Create or preserve jobs for low-income and very low-income persons. Grants of up to \$500,000 to provide loans to businesses, grants for publicly owned infrastructure, and microenterprise assistance. Individual project funding decisions are made by the jurisdiction. Businesses receiving loans must create or retain private sector jobs principally for low-income and very low-income persons. CDBG funds may be lent to businesses for working capital, land acquisition, equipment purchase, inventory purchase, debt restructuring, and other direct assistance. Local grants may support businesses by providing water and sewer services, access roads, and other public facilities. Microenterprise funds may provide credit or technical assistance for persons developing micro enterprises.

Workforce Housing Reward Program

2005 Guidelines and NOFA

Program activity for Funding Round I/II begins Jan. 2005 through Dec. 2005

Round II (\$23 million)

- May-05: NOFA and Guidelines
- Dec-05: Application Released
- Mar-06: Application Due Date

Provides financial incentives to cities and counties that issue building permits for new housing affordable to very low or low-income households. Grant amounts are based on the numbers of bedrooms in units restricted for very low and low-income households for housing units with building permits issued during the 12-month reporting period. Qualifying rental units must be rent-restricted for at least 55 years. Ownership units must be initially sold to qualifying households at affordable cost. Any public funds used to achieve affordability in ownership units must be recovered on resale and reused for affordable housing for at least 20 years. Grants for very low income units are greater than grants for low-income units. Very low income means not over 50 percent of area median income, adjusted for family size. Low-income means not over 80 percent of area median income, adjusted for family size. Construction or acquisition of capital assets such as traffic improvements, neighborhood parks, bike paths, libraries, school facilities, play areas, community centers, police or fire stations.

Quantified Objectives

Analysis:

The City is currently reviewing an eight-unit condominium/subdivision application where the applicant has requested a density bonus and two concessions in return for construction of two moderate-income housing units. When the tentative map is submitted, and if all other agencies agree with the concessions, staff plans to recommend approval.

The City will continue to encourage rehabilitation of very-low income housing units – most are apartments above retail stores on Main Street.

Because some of the houses needing minor upgrades belong to seniors or low-income families, the city will target two low income houses for conservation and preservation.

Table 38: Quantified Objectives - City of Ferndale

Income Group	New Construction	Rehabilitation	Conservation and Preservation
Very Low	0	2	0
Low	0	0	2
Moderate	2	0	0
Above Moderate	0	0	0
TOTAL	2	2	2