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W13b

Prepared August 26, 2026 for the September 9, 2026 Hearing

TO: Coastal Commissioners and Interested Persons

FROM: Shana Gray, Deputy Director, North Coast District and Statewide Planning
Melissa B. Kraemer, North Coast District Manager

**SUBJECT: Humboldt County LCP Amendment No. LCP-1-HUM-24-0054-2-Part B
(Tiny House Villages / Emergency House Villages)**

SUMMARY OF STAFF RECOMMENDATION

Humboldt County is proposing to improve housing diversity and encourage development of new, low-cost housing in the County by allowing groups of three or more Tiny Houses or Moveable Tiny Houses in certain zoning districts subject to coastal development permit authorization. The existing certified IP includes definitions of Tiny House and Moveable Tiny House as (in part) structures intended for separate, independent living quarters designed as a permanent year-round residence for one household. A Tiny House/Moveable Tiny House must be detached, self-contained, no larger than 400 square feet in size, with at least 120 feet of first floor interior living space and must include basic functional areas that support normal daily routines such as cooking, sleeping, and sanitation. Tiny House Villages would be permitted in the Residential Multi-Family (RM), Neighborhood Commercial (CN), and General Commercial (CG) zoning districts and conditionally permitted in the Business Park (MB) and Mixed Residential (R2) zoning districts (eligible lands are shown in [Exhibit 6](#)). The proposed regulations set standards for Tiny House Villages that relate to density (shall not exceed what is allowed by the certified Land Use Plan (LUP) for residential zones and not to exceed 30 units/acre in non-residential zones), water and wastewater, energy, access, parking, waste removal, common areas, and other standards.

Emergency Housing Villages would be allowed in the same zoning districts as Tiny House Villages for the purpose of providing emergency housing during a declared shelter crisis. Emergency Housing Villages may consist of "sleeping cabins" with separate on-site common facilities for cooking, toilets, showers, running water, and sanitation facilities.

The locations of eligible lands are within areas provided with water and wastewater services by the local government or special district. The one exception is the CG land just north of the City of Trinidad where no municipal wastewater services are available, so any Tiny House Village or Emergency Housing Village authorized on those lands could only be approved if it is determined that the development could be adequately served by an onsite wastewater treatment system that meets Regional Water Board standards.

None of the zoning districts where Tiny House Villages and Emergency Housing Villages could occur are those that, under the six certified LUPs, are designated and reserved for priority uses under the Coastal Act (i.e., visitor serving uses, coastal-dependent uses, commercial recreation uses, agricultural uses, etc.). The proposed amendment expressly prohibits housing associated with a Tiny House Village from being used as a short-term rental. Because visitor-serving overnight accommodations, such as hotels, motels, and RV Parks, are principally permitted on Commercial Recreational (CR) lands, which are not affected by this amendment and which remain available for these uses, the proposed amendment as submitted will not impact lower cost visitor serving lodging facilities.

All future projects resulting from this proposed amendment will be subject to the CDP requirements of the certified LCP, and development will be required to comply with all LCP policies and standards related to minimizing risks in hazardous areas, protection of visual resources, protection of environmentally sensitive habitats, and protection of archaeological and tribal cultural resources. None of the eligible lands are located within LUP-designated Coastal Scenic Areas (CSAs), though some projects may be visible from designated Coastal View Areas (CVAs) under the LUPs. Because all projects will require CDP review and will be required to conform to all applicable development standards in the underlying zones, Tiny House Village projects must be found consistent with the scale and character of the surrounding development.

Although there are potentially eligible lands in areas that are within mapped tsunami hazard areas, no housing project would be allowed on those lands, since development authorized under the proposed amendment must meet all LCP policy requirements (including the requirements that restrict new residential development in tsunami hazard and flood zones). In contrast, none of the eligible lands are in the County's mapped "Sea Level Rise Inundation Area" around Humboldt Bay, which is the area that may be inundated with 1-meter of sea-level rise (anticipated to occur by ~2070-2090 according to 2024 OPC projections).

Because any proposed Tiny House Village or Emergency Housing Village project would have to be built in a manner consistent with the LCP and, thus, be protective of coastal resources and public access, Commission staff recommend that the proposed amendment as submitted conforms with and is adequate to carry out the coastal resource protection policies of the County's six certified LUPs.

The Motion to Approve LCP-1-HUM-24-0054-2-Part D **as submitted** is found on **Page 5** of this staff report.

DEADLINE FOR COMMISSION ACTION

Humboldt County transmitted LCP-1-HUM-24-0054-2 to the Commission's North Coast District office on November 5, 2024 as part of a multi-part package of housing-related LCP amendments. The 60-day time limit for the Commission to act on LCP-1-HUM-24-0054-2-Part B is October 16, 2026.

ADDITIONAL INFORMATION

For further information, please contact Melissa Kraemer at the Commission's North Coast District Office in Arcata at Melissa.Kraemer@coastal.ca.gov. If you wish to provide written comments, please do so via regular mail (directed to the North Coast District Office) or email (by emailing NorthCoast@coastal.ca.gov). Commission staff will distribute to the Commissioners any copies of written materials received from interested parties by 5:00 pm on the Friday before the scheduled Commission meeting.

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APPENDICES

[Appendix A – Substantive File Documents](#)

EXHIBITS

[Exhibit 1 – Maps of 6 LUP Plan Areas](#)

[Exhibit 2 – Resolution 25-163 – Tiny House Village Ordinance Transmittal](#)

[Exhibit 3 – Resolution 25-164 – Emergency Housing Village Ordinance Transmittal](#)

[Exhibit 4 – Adopted Ordinance No. 2741 \(Tiny House Villages\)](#)

[Exhibit 5 – Adopted Ordinance No. 2743 \(Emergency Housing Villages\)](#)

[Exhibit 6 – Eligible Lands in the 6 LUP Plan Areas](#)

I. Motion and Resolution

Staff recommend that the Commission, after public hearing, **approve** the Implementation Plan amendment **as submitted**.

Motion:

I move that the Commission **reject** Implementation Plan Amendment No. LCP-1-HUM-24-0054-2-Part B as submitted by the County of Humboldt.

To approve the IP amendment as submitted, staff recommend voting **no** on the above motion.

Failure of this motion will result in certification of the Implementation Plan amendment as submitted and the adoption of the following resolution and findings. The motion passes only by an affirmative vote of a majority of the Commissioners present.

Resolution to certify the implementation plan amendment as submitted:

The Commission hereby **certifies** the County of Humboldt Implementation Plan Amendment LCP-1-HUM-24-0054-2-Part B as submitted and adopts the findings set forth below on grounds that the Implementation Plan amendment conforms with, and is adequate to carry out, the provisions of the certified Land Use Plan. Certification of the Implementation Plan amendment will meet the requirements of the California Environmental Quality Act, because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the Implementation Plan amendment on the environment, or 2) there are no further feasible alternatives and mitigation measures that would substantially lessen any significant adverse impacts on the environment.

II. Procedural Issues

A. Standard of Review

Coastal Act Section 30513 provides in part:

The local government shall submit to the Commission the zoning ordinances, zoning district maps, and, where necessary, other implementing actions that are required pursuant to this chapter.

...The Commission may only reject ordinances, zoning district maps, or other implementing action on the grounds that they do not conform with, or are inadequate to carry out, the provisions of the certified land use plan. If

the Commission rejects the zoning ordinances, zoning district maps, or other implementing actions, it shall give written notice of the rejection, specifying the provisions of the land use plan with which the rejected zoning ordinances do not conform, or which it finds will not be adequately carried out, together with its reasons for the action taken.

The Commission may suggest modifications...

The standard of review for the proposed amendment to the County's certified Implementation Plan (IP) (Chapters 1, 2, and 3 of Title III Division 1, Coastal Zoning Regulations), pursuant to Section 30513 of the Coastal Act, is whether the proposed amendment is in conformance with, and adequate to carry out, the provisions of the certified Land Use Plan (LUP) portions of the County's certified LCP. As described in Finding III-B, Humboldt County has six certified LUPs ([Exhibit 1](#)).

B. Public Participation

Section 30503 of the Coastal Act requires public input in preparation, approval, certification, and amendment of any LCP. The Humboldt County Planning Commission held public hearings on both the Tiny House Village amendment and the Emergency Housing Village amendment on April 18 and May 13, 2024 (public workshops) and on June 27, 2024 and July 18, 2024. The amendments ultimately were drafted as two separate ordinances ([Exhibits 2 & 4](#) and [Exhibits 3 & 5](#)) that together were presented to and considered by the County Board of Supervisors on August 20, 2024, when the Board adopted the two ordinances. The County Board later, on November 4, 2025, took a related action on the amendments to correct procedural errors associated with its earlier action on the two ordinances (Exhibits 2 and 3). All local hearings were noticed to the public consistent with sections 13551 and 13552 of Title 14 of the California Code of Regulations. Notice of the subject amendment has been distributed to all known interested parties.

C. Procedural Requirements

Pursuant to section 13544(b)(2) of Title 14 of the California Code of Regulations, if the Commission certifies the LCP amendment as submitted, no further County action will be necessary for the LCP amendment to immediately take effect. Should the Commission certify the LCP amendment subject to modifications, final approval by the County and a determination by the Executive Director of compliance with section 13544 of the Commission's regulations will be required for the amendment to take effect. Should the Commission deny the LCP amendment as submitted without suggested modifications, no further action is required by either the Commission or the County, and the proposed LCP amendment will not become effective.

D. Deadline for Commission Action

Humboldt County transmitted LCP-1-HUM-24-0054-2 to the Commission's North Coast District office on November 5, 2024 as part of a multi-part package of housing-related

LCP amendments. The 60-day time limit for Commission action on the proposed LCP amendment is October 16, 2026.

III. Findings for approval of the IP amendment as submitted

The following findings support the Commission's approval of the proposed Implementation Plan Amendment as submitted. The Commission hereby finds and declares as follows:

A. Amendment Description

The subject application includes amendments to the County's Implementation Plan (specifically to Chapter 3 of Division 1 of Title III of the Humboldt County Code) that, as mentioned above, were adopted under two separate ordinances that together were presented to and considered by the County Board of Supervisors at a combined hearing for the ordinances held on August 20, 2024. The scope of each ordinance is described below.

1. Tiny House Villages

The purpose of Ordinance 2741 ([Exhibit 4](#)) is to improve housing diversity and encourage development of new, low-cost housing in the County by allowing groups of three or more Tiny Houses or Moveable Tiny Houses in certain zoning districts subject to coastal development permit authorization (in some cases Conditional Use Permit and Special Permit authorization also would be required). Tiny House Villages would be permitted in the Residential Multi-Family (RM), Neighborhood Commercial (CN), and General Commercial (CG) zoning districts and conditionally permitted in the Business Park (MB) and Mixed Residential (R2) zoning districts.

The existing certified IP (sections 313-155 & 148) includes definitions of Tiny House and Moveable Tiny House as follows:

Tiny House. *A structure intended for separate, independent living quarters, designed as a permanent year-round residence for one household that:*

- 1. Is built or installed on a permanent foundation or anchored with a foundation system meeting State approved requirements for manufactured housing, or that is designed by a licensed architect or engineer to meet those requirements.*
- 2. Is no larger than 400 square feet;*
- 3. Has at least 120 feet of first floor interior living space;*
- 4. Is a detached self-contained unit that includes basic functional areas that support normal daily routines such as cooking, sleeping, and sanitation.*

Moveable Tiny House. *A structure no larger than 400 square feet intended for separate, independent living quarters, designed as a permanent year-round residence for one household that meets these six conditions:*

- 1. Is licensed and registered with the California Department of Motor Vehicles and meets National Fire Protection Association (NFPA) RV 1192 standards, or if certified after January 1, 2021, meets American National Standards Institute (ANSI) 119.5 Park Model standards. Certification must be made by a qualified third-party inspector accredited through American Society for Testing and Materials.*
- 2. Is towable by a bumper hitch, frame-towing hitch, or fifth-wheel connection, and is not designed to move under its own power;*
- 3. Is no larger than allowed by California State Law for movement on public highways;*
- 4. Has at least 120 feet of first floor interior living space;*
- 5. Is a detached self-contained unit that includes basic functional areas that support normal daily routines such as cooking, sleeping, and sanitation; and.*
- 6. Substantially complies with local building, health, and safety codes as set forth in this code that it qualifies as a permanent dwelling.*

The proposed amendment adds a new IP chapter (section 313-62.3) that sets various standards for Tiny House Villages.¹ The standards relate to density (shall not exceed what is allowed by the LCP for residential zones and not to exceed 30 units/acre in non-residential zones), types and number of structures allowed, water and wastewater, energy, access, parking, waste removal, common areas, and other standards. The proposed amendment also includes standards for Dependent Unit Villages,² which would allow for multiple Dependent Sleeping Units³ not fully equipped with a kitchen and bathroom that have access to separate on-site common facilities for kitchen, shared bathroom, and sanitary facilities.

¹ A Tiny House Village is defined in the proposed amendment in part as “a grouping of three (3) or more Tiny Houses or Moveable Tiny Houses... would also include a Dependent Unit Village with three (3) or more Dependent Sleeping Units with central sanitary, cooking, and dining facilities... considered multi-family housing and not a mobile home park, an RV park, or a special occupancy park.”

² A Dependent Unit Village is defined in the proposed amendment in part as multi-family housing involving “a grouping of three (3) or more Dependent Sleeping Units and contains separate common facilities equipped with, but not limited to, kitchen areas, toilets, showers and bathrooms with running water.”

³ A Dependent Sleeping Unit is defined in the proposed amendment as “a hard-roof and sided structure providing at a minimum a room for living and sleeping that is not fully equipped with a kitchen area, shower, and toilet or sewage disposal system” (but which may contain a toilet or sewage disposal system).

2. Emergency Housing Villages

The purpose of Ordinance 2743 ([Exhibit 5](#)) is to develop standards for emergency housing during a declared shelter crisis.⁴ The proposed amendment would add a new IP chapter (section 313-62.5) setting operating and development standards for Emergency Housing Villages,⁵ which may consist of Emergency Dependent Unit Villages⁶ or Alternative Lodge Parks. Emergency Dependent Unit Villages essentially consist of clusters of “Emergency Sleeping Cabins” defined in part as a hard-roof and sided structure that provides a room for living and sleeping but which is not equipped with a kitchen, toilet, or sewage disposal system. There would be separate on-site common facilities for cooking, toilets, showers, running water, and sanitation facilities. Alternative Lodge Parks are defined as spaces for occupancy for persons experiencing homelessness that allow a broad range of housing types during a local emergency housing crisis, including manufactured and mobile homes, recreational vehicles, travel trailers, tiny houses and moveable tiny houses.

B. Environmental Setting / Standard of Review

Pursuant to Coastal Act section 30513, to certify the proposed amendment to the IP portion of the County of Humboldt LCP, the Commission must find that the IP as amended would be in conformity with and adequate to carry out the policies of the certified LUP. Humboldt County has six certified LUP “Area Plans,” each certified by the Commission in the early 1980’s. From north to south, these are the North Coast Area Plan, Trinidad Area Plan, McKinleyville Area Plan, Humboldt Bay Area Plan, Eel River Area Plan, and South Coast Area Plan. The IP as amended must be in conformity with and adequate to carry out the policies of each. Maps of the six LUP planning areas are included as [Exhibit 1](#), and eligible lands where the amendment applies are described for each LUP area below and depicted on maps shown in [Exhibit 6](#).

North Coast Area Plan (NCAP)

The NCAP area extends from the northern County line approximately 23 miles south to Patricks Point and up to two miles inland ([Exhibit 1](#), page 2). The area also includes nine miles of coastal lagoons (Freshwater Lagoon, Stone Lagoon, and Big Lagoon) and regionally unique wetland habitats (Big Lagoon Bog). Redwood National Park and

⁴ The amendment references Government Code Chapter 7.8 – Shelter Crisis, Section 8698.4 – see https://leginfo.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV§ionNum=8698.4.

⁵ An Emergency Housing Village is defined in the proposed amendment in part as “*any facility to be for persons experiencing homelessness for the duration of the shelter crisis... [including] Emergency Dependent Unit Villages and Alternative Lodge Parks, and is allowable under Government Code 8698.4 addressing emergency housing upon declaration of a shelter crisis.*”

⁶ An Emergency Dependent Unit Village is defined in the proposed amendment in part as “*a grouping of three (3) or more Emergency Sleeping Cabins that are not equipped with a kitchen area, toilet, or sewage disposal system. This applies to any facility to be for persons experiencing homelessness for the duration of the shelter crisis... [and] shall contain separate on-site common facilities that include, but are not limited to, kitchen areas, toilets, showers and bathrooms with running water.*”

several State and County parks are within and adjacent to the area. There are two areas of deferred certification (ADCs) within the North Coast area – Big Lagoon Shoreline Lots and Stagecoach Hill. The Big Lagoon Shoreline Lots ADC includes about 30 acres and 34 assessor's parcels west of Ocean View Drive and Roundhouse Creek Road, south of Big Lagoon. The Stagecoach Hill ADC includes about 685 acres and 31 assessor's parcels east of Big Lagoon and Highway 101. The Commission is responsible for the review and processing of coastal development permits in the ADCs; the certified LCP may be used as guidance.

Trinidad Area Plan (TAP)

The TAP area extends along approximately six miles of coastline from Sue-meg State Park to Little River State Beach and includes rural lands around the City of Trinidad and the unincorporated community of Westhaven ([Exhibit 1](#), page 3). Several state and County beaches and parks in the TAP area are popular visitor destination points. Most developed properties in the area are on individual wells and onsite wastewater treatment systems, though some water service is provided to certain areas (e.g., portions of Westhaven) by the City of Trinidad or small community services districts reliant on water supply extracted from perennial creeks and streams. There is one area of deferred certification (ADC) within the Trinidad Area Plan planning area – Trinidad Area Shoreline Lots ADC. The ADC includes about 534 acres and 133 assessor's parcels consisting of (a) five shoreline parcels south of the City of Trinidad along the 6th Avenue Trail in Westhaven and (b) all of those privately owned lots, other than those owned by the Trinidad Coastal Land Trust, west of Scenic Drive and Patrick's Point Drive (where these two roads are the first public roads nearest the sea) and north of the City of Trinidad to Patricks Point.

McKinleyville Area Plan (MAP)

The MAP area includes a five-mile-long stretch of coastal lands from the Little River to the Mad River and up to four miles inland (around the Mad River) ([Exhibit 1](#), page 4). The unincorporated community of McKinleyville is located partially within the coastal zone atop an uplifted marine terrace separated from the ocean by a series of coastal dunes and bluffs. Much of the MAP area has urban services (water and sewer) and has largely been built out.

Humboldt Bay Area Plan (HBAP)

The HBAP area includes approximately 20 miles of coastline extending from the Mad River to the north end of Table Bluff, plus over 100 additional miles of estuarine shoreline along Humboldt Bay and its tidally influenced tributaries ([Exhibit 1](#), page 5). The HBAP area includes the north and south spits of Humboldt Bay, the farmed bottomlands around Arcata and Eureka, and various unincorporated urban areas (e.g., Samoa, Manila, Myrtle town, King Salmon, Fields Landing, and Humboldt Hill). Much of the HBAP area is served with urban services (sewer and/or water), and the LUP boundaries abut the cities of Eureka and Arcata. The Humboldt Bay Harbor, Recreation, and Conservation District manages the Port of Humboldt Bay.

Eel River Area Plan (ERAP)

The ERAP area includes lands that extend from Table Bluff, which lies just south of Humboldt Bay, approximately 11.5 miles southward to the rural ranchlands around and southwest of the cities of Ferndale and Fortuna ([Exhibit 1](#), page 6). The ERAP area is mostly rural, except for the unincorporated community of Loleta (population approximately 780) north of the Eel River, which has community wastewater and water services. The ERAP area includes the entire Eel River Delta that extends inland over 10 miles to the confluence of the Van Duzen River with the main-stem Eel River.

South Coast Area Plan (SCAP)

The SCAP area is the largest geographically of the County's six LUPs, extending over 45 miles from the rural ranches around Guthrie Creek (southwest of Ferndale) to the southern County line ([Exhibit 1](#), page 7). The federally owned and managed King Range National Conservation Area bisects the planning area into two sections – the “north” SCAP area, including the coastal lands that extend from Guthrie Creek south to the Mattole River estuary, and the Shelter Cove area near the south end of the King Range. The SCAP area is completely rural except for Shelter Cove, which includes a ~2,640-acre, 4,700-lot residential subdivision (partially developed) served by Resort Improvement District #1 with community sewer, water, fire protection, and other services.

C. Consistency Analysis

To approve the amendments to the IP, the Commission must find the IP, as amended, conforms with, and is adequate to carry out, the provisions of the land use plan (LUP) pursuant to section 30513 of the Coastal Act. As explained in the Findings below, the proposed IP amendment is in full conformity with, and would adequately carry out, the policies of the County's six LUPs.

Each of the six LUPs, for the most part, codifies verbatim the various Coastal Act policies protecting priority uses [Coastal Act sections 30213, 30222, 30223, 30260, and 30234 (the latter included in the HBAP & SCAP only) and 30255 (included in the NCAP, TAP, MAP, and HBAP), public access and recreation (Coastal Act sections 30210-30224 (the latter policy is included in the NCAP, MAP, and HBAP only), marine resources, water quality, and wetlands (sections 30230, 30231, & 30233), riverine resources and environmentally sensitive habitat areas (sections 30236 & 30240), agricultural and timber resources (sections 30241-30243), cultural resources (section 30244), and visual resources and community character [sections 30251 & 30253(e)]. The LUPs also require residential uses to be concentrated primarily in urban areas where they can be accommodated with adequate public services (section 30250). The LUPs also require minimization of hazard risks and avoidance of shoreline armoring (sections 30253(a) and (b) and 30235) among other coastal resource policy requirements that in some cases are more detailed, specific, and protective of coastal resources than the Coastal Act policy requirements. For example, specific development setbacks from wetlands and riparian areas are specified in each LUP for both urban areas and rural areas (e.g., a minimum protective buffer of 250 feet is required along

certain riverine riparian areas, such as along the Eel River in the Eel River Area LUP), and in areas designated as “Coastal Scenic Areas” on certified LUP maps in the North Coast Area, Trinidad Area, McKinleyville Area, and Humboldt Bay Area LUPs, new development must protect not only public views to the ocean but also must be subordinate to the character of the setting.

Local governments and the Commission are tasked with encouraging affordable housing that serves diverse communities while ensuring that coastal resources and public access are protected. The intent of the proposed amendment is to implement policies from the County’s current Housing Element (dated 2019) that the County is required by state law to implement.⁷ This proposed LCP amendment addresses the following certified (by the California Department of Housing and Community Development) Housing Element policy (among others):

H-IM40. Allowance for Tiny House Villages. The County shall amend the Zoning Regulations to allow a grouping or clustering of three or more tiny houses or moveable tiny houses as multifamily dwellings and shall be permitted by right in all zones that allow multifamily dwellings. A grouping or clustering of three or more detached bedrooms with central sanitary, laundry, cooking and dining facilities shall also constitute a tiny house village and shall be permitted by right in all zones that allow multifamily dwellings. Tiny house villages shall meet objective development and performance standards to protect public health and safety, including density of occupation, setbacks, buffers and screening, lighting, and off-street parking...

H-IM58. Alternative Lodge Park. Amend the Zoning Regulations to include provisions for Alternative Lodging Park (ALP) as an enumerated use subject to a use permit. An ALP would provide spaces for temporary or permanent occupancy that are flexible allowing a broad range of housing types. The range of allowable dwelling types including manufactured and mobile homes, recreational vehicles, travel trailers, tiny houses, moveable tiny houses and temporary camping facilities.

- *Siting standards to include the requirement for connection to commercial wastewater and water systems. The ALP standards will specify zoning districts where an ALP may be sited and the minimum parcel size. Standards for space size, internal circulation, buffer zones and screening devices, open space/recreational facilities and additional common buildings, etc. will be specified.*

⁷ The County’s 6th-cycle Housing Element (2019) is accessible from the County’s website (the County’s next housing element is due in 2027): <https://humboldt.gov/DocumentCenter/View/79162/Chapter-8--2019-Housing-Element-Final-PDF?bidId=>.

- *The maximum units per acre for any park will be determined by the Planning Commission based on site conditions...*

The proposed standards address the various issues identified by the above policy – water and sanitation services, density, setbacks, buffers and screening, lighting, off-street parking, etc. As proposed, Tiny House Villages and Emergency Housing Villages would be allowed on lands planned and zoned for Medium-Density Residential (RM), Neighborhood Commercial (CN), General Commercial (CG), Mixed Residential (R2),⁸ and Business Park Industrial (MB) uses under the certified LCP. The maximum density allowed under the proposed amendment may not exceed what is allowed by the certified LUP for residential zones and may not exceed 30 units per acre for non-residential zones (30 units per acre for non-residential zones is consistent with the density allowance for multi-family residential lands under the certified LUPs).

None of the zoning districts where Tiny House Villages and Emergency Housing Villages could occur are those that, under the certified LCP, are designated and reserved for priority uses under the Coastal Act (i.e., visitor serving uses, coastal-dependent uses, commercial recreation uses, agricultural uses, etc.). The priority use lands are largely carried out on lands designated and zoned Commercial Recreation (CR), Public Recreation (PR), Coastal-Dependent Industrial (MC), Agricultural Exclusive (AE), Commercial Timberland (TC), and Natural Resources (NR).

In terms of location of eligible lands within each of the six LUP plan areas, the lands eligible to accommodate Tiny House Villages, Dependent Unit Villages, and Emergency Housing Villages are relatively limited in most areas, as described below:

- Within the NCAP area, the only area where Tiny House Villages or Emergency Housing Villages could occur is on seven parcels of CG land that front Highway 101 in the Orick area ([Exhibit 6](#), page 1). There are no MB, RM, or R2 lands in the NCAP area.
- Within the TAP area, eligible lands are limited to six parcels of CG land just north of the City of Trinidad along Patricks Point Drive ([Exhibit 6](#), page 2). There are no MB, RM, or R2 lands in the TAP area.
- Within the MAP area, eligible lands occur within the Airport Business Park (MB) east of Highway 101 off of Boeing Ave. and on an approximately half-acre CG parcel at the corner of School Road and Fischer Ave ([Exhibit 6](#), pages 3-4). There are no RM or R2 lands in the MAP area.
- Within the HBAP area, there are several areas of eligible lands, including on CG lands in Manila, Samoa, South Broadway, Myrtle town, Indianola, and Fields

⁸ The existing certified IP describes the Mixed Residential Principally Permitted Use (uses allowed by right) as: Single Family Residential, Multi Family Residential (Duplex only), Cottage Industry, and Minor Utilities to serve these uses.

Landing; on MB and RM lands in Samoa; on R2 and RM lands in Myrtle town; and on RM lands in the Humboldt Hill area ([Exhibit 6](#), pages 5-7).

- Within the ERAP area, eligible lands include CG areas within Loleta and Fernbridge and RM lands in Loleta ([Exhibit 6](#), pages 8-9). There are no MB or R2 lands in the ERAP area.
- Within the SCAP area, there are various eligible CG and R2 lands within Shelter Cove ([Exhibit 6](#), pages 10-11). There are no MB or RM lands in the SCAP area.

As proposed under this amendment, Tiny House Villages, Dependent Unit Villages, and Emergency Housing Villages could be permitted with a coastal development permit (CDP) in the RM, CN, and CG zoning districts and as a conditional use (requiring both a CDP and a conditional use permit) in the MB and R2 zoning districts. Alternate Lodge Parks would be allowed with both a CDP and CUP in all the aforementioned zoning districts. Because the proposed amendment will not result in authorization of non-priority uses on priority use lands protected under the LUPs and the Coastal Act, the amendment and its allowances will not impact water-oriented activities, ocean-front land reserved for recreational uses, timberland or agricultural uses, or aquaculture and other coastal dependent uses.

The proposed amendment expressly prohibits housing associated with a Tiny House Village from being used as a short-term rental. Regardless, because visitor-serving overnight accommodations, such as hotels, motels, and RV Parks, are principally permitted on CR lands, which are not affected by this amendment and which remain available for these uses, the proposed amendment as submitted will not impact lower cost visitor serving lodging facilities.

As proposed, the locations of eligible lands are within areas provided with water and wastewater services by a local government or special district, such as the Orick Community Services District (CSD) in the NCAP area, the City of Trinidad (water service) in the TAP area, the McKinleyville CSD in the MAP, the Humboldt CSD, Peninsula CSD, or others in the HBAP area, the Loleta CSD in the ERAP area, and the Resort Improvement District in the SCAP area. The one exception is the CG land just north of the City of Trinidad where no municipal wastewater services are available, so any Tiny House Village or Emergency Housing Village authorized on those lands could only be approved if it is determined that the development could be adequately served by an onsite wastewater treatment system that meets Regional Water Board standards.

All future projects resulting from this proposed amendment will be subject to the CDP requirements of the certified LCP, which this amendment does not change. Development will be required to comply with all LCP policies and standards related to minimizing risks in hazardous areas, protection of visual resources, protection of environmentally sensitive habitats, and protection of archaeological and tribal cultural resources. None of the eligible lands where this type of development would occur are located within LUP-designated Coastal Scenic Areas (CSAs), though some projects

may be visible from designated Coastal View Areas (CVAs) under the LUPs.⁹ Because all projects will require CDP review and will be required to conform to all applicable development standards in the underlying zones, Tiny House Village projects must be found consistent with the scale and character of the surrounding development.

With respect to potential effects on public access, the proposed amendment requires a minimum of one car parking space for every two units on the site (less parking is required if the project site is located within one-half mile of a bus stop and when at least one secure bicycle locker is provided for every two units on the site). Coastal access points are unlikely to be impacted inconsistent with the certified LUPs and the public access policies of the Coastal Act, because most of the eligible lands are not located directly near coastal access points. Thus, the proposed amendment as submitted will encourage additional housing within the coastal zone while minimizing adverse impacts to public access.

Due to the nature of the County setting in terms of seismic issues and the abundance of forested landscapes, most of the Humboldt County coastal zone is located in an area of high geologic, flood, and/or fire hazard(s). For example, much of the County is located in areas of high seismic hazard and/or fault hazard zones, and many of the low-lying areas of the coastal zone are at risk of tsunami inundation from waves generated by infrequent but extremely large-magnitude earthquakes that originate from the Cascadia Subduction Zone (CSZ) offshore from the North Coast. The Gorda plate is being actively subducted beneath the North American plate north of Cape Mendocino along the southern part of the CSZ, which extends north from Humboldt County upcoast to Canada. Most of the tsunami hazard area within the County is located in the Humboldt Bay area. The HBAP includes a policy (3.17-B-3) that prohibits new development in tsunami hazard areas except for “public access, boating, public recreation facilities, agriculture, wildlife management, habitat restoration, and ocean intakes, outfalls, and pipelines, and dredge spoils disposal.” Although there are eligible zoning district lands in areas that are within mapped tsunami hazard areas (e.g., CG lands in Manila and Samoa), no housing associated with a Tiny House Village or Emergency Housing Village project would be allowed on those lands, since development authorized under the proposed amendment must meet all LCP policy requirements. In contrast, none of the eligible lands are located in the County’s mapped “Sea Level Rise Inundation Area” around Humboldt Bay, which is the area that may be inundated with 1-meter of sea-level rise (which is projected to occur by ~2070-2090 according to 2024 OPC projections).

Because any proposed Tiny House Village or Emergency Housing Village project would have to be built in a manner consistent with the LCP and be protective of coastal

⁹ Each of the LUPs have certain areas designated as Coastal Scenic Areas (CSAs) and/or certain areas designated as Coastal View Areas (CVAs). CSAs are areas where new development must be subordinate to the character of the designated area and to the scenic use and enjoyment of public recreational lands in such areas. CVAs are so designated to ensure that no development blocks public coastal views from the CVA. Various standards apply to development in CSAs and to development visible from CVAs as specified in each LUP.

resources and public access, the Commission finds that the proposed amendment as submitted conforms with and is adequate to carry out the coastal resource protection policies of the County's six certified LUPs.

IV. California Environmental Quality Act

As set forth in section 21080.9 of the California Public Resources Code, CEQA exempts local government from the requirement of preparing an environmental impact report (EIR) in connection with its activities and approvals necessary for the preparation and adoption of an LCP. Instead, the CEQA responsibilities are assigned to the Coastal Commission, and the Commission's LCP review and approval program has been found by the Resources Agency to be the functional equivalent of the environmental review required by CEQA, pursuant to CEQA Section 21080.5. Therefore, the Commission is relieved of the responsibility to prepare an EIR for each LCP.

Nevertheless, the Commission is required in approving an LCP amendment to find that approval of the proposed LCP as amended, does conform with CEQA provisions, including the requirement in CEQA Section 21080.5(d)(2)(A) that the amended LCP will not be approved or adopted as proposed if there are feasible alternatives or feasible mitigation measures available that would substantially lessen any significant adverse impact which the activity may have on the environment [14 CCR §§13542(a), 13540(f), and 13555(b)].

The County's LCP amendment consists of an IP amendment. The Commission incorporates its findings on Coastal Act and LUP conformity into this CEQA finding as if set forth in full herein. As discussed throughout the staff report and hereby incorporated by reference, the IP amendment conforms with and is adequate to carry out the policies of the certified LUPs. The Commission finds that approval of the IP amendment will not result in significant adverse environmental impacts within the meaning of CEQA. Therefore, the Commission finds that there are no other feasible alternatives or mitigation measures which would substantially lessen any significant adverse impact, either individual or cumulatively, which the activity may have on the environment [14 CCR §§ 13542(a), 13540(f), and 13555(b)].

Appendix A

Substantive File Documents

Humboldt County certified local coastal program (LCP)

North Coast Area Plan

Trinidad Area Plan

McKinleyville Area Plan

Humboldt Bay Area Plan

Eel River Area Plan

South Coast Area Plan

Coastal Zoning Regulations

Humboldt County Housing Element. 2019.

<https://humboldt.gov/DocumentCenter/View/79162/Chapter-8---2019-Housing-Element-Final-PDF?bidId=>