

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT**

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November 14, 2025

Tracey Ferguson, Director
Plumas County Planning Department
County of Plumas
555 Main Street
Quincy, California 95971

Dear Tracey Ferguson:

RE: County of Plumas' 7th Cycle (2024-209) Draft Housing Element

Thank you for submitting the County of Plumas' (County) draft housing element received for review on August 18, 2025. Pursuant to Government Code section 65585, the California Department of Housing and Community Development (HCD) is reporting the results of its review. In addition, HCD considered comments from David Kellogg pursuant to Government Code section 65585, subdivision (c).

The draft element addresses many statutory requirements; however; revisions will be necessary to comply with State Housing Element Law (Gov. Code, § 65580 et seq). The enclosed Appendix describes the revisions needed to comply with State Housing Element Law.

As a reminder, the County's 6th cycle housing element was due June 30, 2024. As of today, the County has not completed the housing element process for the 7th cycle. The County's 6th cycle housing element no longer satisfies statutory requirements. HCD encourages the County to expeditiously revise the element, adopt, and submit to HCD to regain housing element compliance.

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the County should continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available and considering and incorporating comments where appropriate. Please be aware, any revisions to the element must be posted on the local government's website and to email a link to all individuals and organizations that have previously requested notices relating to the local government's housing element at least seven days before submitting to HCD.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant, the Affordable Housing and Sustainable Communities program, and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the County will meet housing element requirements for these and other funding sources.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the County to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Land Use and Climate Innovation at: <https://www.lci.ca.gov/planning/general-plan/guidelines.html>.

HCD appreciates the coordination and effort of the housing element update team to prepare the housing element. We are committed to assisting the County in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Jed Hackett, of our staff, at jed.hackett@hcd.ca.gov.

Sincerely,



Paul McDougall
Senior Program Manager

Enclosure

APPENDIX COUNTY OF PLUMAS

The following changes are necessary to bring the County's housing element into compliance with Article 10.6 of the Government Code. Accompanying each recommended change, we cite the supporting section of the Government Code.

Housing element technical assistance information is available on HCD's website at <https://www.hcd.ca.gov/planning-and-community-development/hcd-memos>. Among other resources, the housing element section contains HCD's latest technical assistance tool, *Building Blocks for Effective Housing Elements (Building Blocks)*, available at <https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks> and includes the Government Code addressing State Housing Element Law and other resources.

A. Review and Revision

Review the previous element to evaluate the appropriateness, effectiveness, and progress in implementation, and reflect the results of this review in the revised element. (Gov. Code, § 65588 (a) and (b).)

As part of the review of programs in the past cycle, the element must provide an evaluation of the effectiveness of goals, policies, and related actions in meeting the housing needs of special needs populations (e.g., elderly, persons with disabilities, large households, female headed households, farmworkers, and persons experiencing homelessness). Programs should be revised as appropriate to reflect the results of this evaluation. HCD will send sample analyses under separate cover.

B. Housing Needs, Resources, and Constraints

1. *Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2...shall include an assessment of fair housing in the jurisdiction (Gov. Code, § 65583, subd. (c)(10)(A))*

Disproportionate Housing Needs, Including Displacement Risk: While the element describes displacement impacts related to recent fire disasters, it should also discuss disproportionate impacts on lower income and special needs populations such as elderly and persons with disabilities. Based on the outcomes of this analysis, the element should add or modify programs.

Identified Sites and Affirmatively Furthering Fair Housing (AFFH): The element lists the regional housing need allocation (RHNA) by income group and socio-economic characteristics for some of the unincorporated communities. However; the element

should analyze how identified sites AFFH. For example, a strong majority of the lower-income RHNA appears to be focused in communities with relatively higher concentrations of poverty while the moderate and above moderate RHNA appears to be located in communities with relatively higher concentrations of upper income households. Further, the element should examine the location of identified sites by income group within each of the communities. For example, the element should discuss whether sites are concentrated in an area of town or dispersed throughout the town. Based on the outcomes of this analysis, the element should add or modify programs to promote more equitable and inclusive communities. For example, the element could add programs to improve housing mobility (housing choices and affordability across more geographies) and expand place-based strategies toward community revitalization (e.g., rehabilitation, weatherization, neighborhood improvements, parks, community amenities and facilities, streets, safe routes to school).

Contributing Factors to Fair Housing Issues: Based on the outcomes of a complete analysis, the element should reassess and prioritize contributing factors to fair housing issues and add or modify programs as appropriate.

2. *Include an analysis of population and employment trends and documentation of projections and a quantification of the locality's existing and projected needs for all income levels, including extremely low-income households. (Gov. Code, § 65583, subd. (a)(1).)*

Analyze any special housing needs such as elderly; persons with disabilities, including a developmental disability; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. (Gov. Code, § 65583, subd. (a)(7).)

Analyze existing assisted housing developments that are eligible to change to non-low-income housing uses during the next 10 years due to termination of subsidy contracts, mortgage prepayment, or expiration of use restrictions. (Gov. Code, § 65583, subd. (a)(9) through 65583(a)(9)(D).)

Extremely Low-Income Households (ELI): The element quantifies households by income ranges but should specifically quantify existing ELI households and analyze their housing needs. Given the unique and disproportionate needs of ELI households, the element must include analysis to better formulate policies and programs. For example, the element could analyze rates of tenure, overpayment, housing burdens and other household characteristics and compare ELI households to other income groups to discuss disproportionate impacts. For additional information, see the Building Blocks at <https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/extremely-low-income-housing-needs>.

Special Housing Needs: While the element generally describes special housing needs, it should expand the analysis, as follows:

- *Persons with Developmental Disabilities:* The element should discuss housing

situation for individuals (e.g. independent, living with parents, etc.), and effectiveness of policies and programs to address housing needs.

- *Elderly and Large Households*: The element should analyze elderly and large households by tenure (e.g., renter and owner).
- *Person Experiencing Homelessness*: The element should clarify the estimate of persons experiencing homelessness in the unincorporated County.

Units At-Risk of Converting to Market Rate Uses: The element states no units are at-risk of conversion to market rate uses (at-risk). However; HCD records indicate Valley Heights Apartments (1374 PEPARD Flat Road) are at-risk. The County should reconcile this information, add analysis if necessary and amend programs as needed. The analysis of at-risk units must include an estimate of the total cost for producing, replacing and preserving the units at-risk and identifying public and private nonprofit corporations known to the County to have the legal and managerial capacity to acquire and manage at-risk units and potential federal, state and local financing and subsidy programs. For additional information and sample analysis, see the *Building Blocks* at <https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/assisted-housing-developments-risk-conversion>.

3. *An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)*

Realistic Capacity: The estimate of the number of units for each site (realistic capacity) must be adjusted as necessary, based on the land use controls and site improvements, typical densities of existing or approved residential developments at a similar affordability level and infrastructure capacity. The estimate may use minimum densities, and no additional analysis is required. The element mentions minimum densities are utilized but the sites inventory (Appendix B) does not appear to use minimum densities for realistic capacity. Also, the element does not appear to indicate whether minimum densities are required. Further, in one case (APN 115-080-022), the element uses a realistic capacity assumption that far exceeds typically built multifamily densities as noted on page 96 (7 to 10 units per acre). To address this requirement, the element should either assume minimum densities, if required or planned to be required, or evaluate typical densities by zone and make adjustments to capacity assumptions, as appropriate, including adjusting APN 115-080-022. This analysis may utilize typical densities from the broader region.

Suitability of Nonvacant Sites (APN 116-112-008): The element must demonstrate the potential for redevelopment on identified nonvacant sites. While the element demonstrates potential for redevelopment for most nonvacant sites, it should expand the analysis of APN 116-112-008 and discuss the extent existing uses impede additional development. For example, the element could discuss whether the property is occupied, has had any recent turnover, if there is interest from property owner in residential development, whether any known conditions preclude redevelopment, and any recent trends or other

information to support the ratio of existing versus allowable number of units as an indicator of redevelopment potential. This analysis may utilize trends from the broader region.

Accessory Dwelling Units (ADU): To utilize ADUs toward the RHNA, the element must demonstrate affordability and the number of anticipated ADUs based on past trends and other relevant factors. Instead, the element is crediting past permitted ADUs in the 6th cycle toward the 7th cycle RHNA. While the element can use past trends to support assumptions, it cannot use past permitted units as credit in the 7th cycle. To address this requirement, the element should evaluate the number of ADUs permitted in the past per year then project that number in the 7th cycle. For example, based on HCD records, the County averaged 3 ADUs per year since 2018 with a recent uptick in 2024, potentially because of recently established incentives. As a result, the County could reasonably assume 4 ADUs per year (3 ADUs per year plus 1 ADU per year to account for recently established incentives). In addition, the element must demonstrate the affordability of ADUs. Currently, the element assumes all ADUs will be affordable to very low-income households – an aggressive assumption that should be adjusted. To demonstrate affordability, the element could utilize information from past permitted units, survey of recent ADUs, utilize new market rents on a square foot basis to make assumptions for ADUs or past studies conducted by the state or other regions.

Infrastructure: The element currently makes a general statement that water and sewer capacity is sufficient by each of the service districts. However; to support this statement, the element should list the actual number of available connections (existing and planned) in each district.

Environmental Constraints: The element discusses potential environmental constraints on identified sites but should also address any other known potential constraints that could preclude development in the planning period. Examples of other known constraints include shape, access, easements, conservation easements, environmental overlays, property conditions, airport compatibility or contamination.

Zoning for a Variety of Housing Types:

- *Emergency Shelters:* The element should be revised to discuss the definition of emergency shelters and whether consistent with new requirements and if needed, modify programs. For example, the statutory definition was recently revised to include other interim interventions, including, but not limited to, a navigation center, bridge housing, and respite or recuperative care.
- *Low Barrier Navigation Center:* The element explains that Low Barrier Navigation Centers are permitted without discretionary action in the M-R Zone but should also discuss compliance with other provisions of Government Code 65661 such as whether multifamily is permitted in nonresidential zones. Based on the outcomes of a complete analysis, the element should add or modify programs, as appropriate.
- *Single Room Occupancy (SRO) Units:* The element shows that SROs are allowed in the M-R zone with a special use permit but should discuss whether the procedure

and development standards encourage and facilitate the use. Based on a complete analysis, the element should add or modify programs to address any identified constraints.

4. *An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures... (Gov. Code, § 65583, subd. (a)(5).)*

An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including... requests to develop housing at densities below those anticipated in the analysis required by subdivision (c) of Government Code section 65583.2... (Gov. Code, § 65583, subd. (a)(6).)

Land Use Controls: The element should be revised to discuss whether parking requirements include guest parking and evaluate impacts on smaller bedroom types (e.g., studio and one bedroom).

Local Processing and Permit Procedures: The element should analyze the typical process for multifamily developments (five or more units) that are consistent with the general plan and zoning. The analysis should evaluate impacts on housing costs, timing and approval certainty and address approval body, any public hearings, approval findings and design review. For example, the analysis should evaluate any subjective findings or requirements and impacts on approval certainty.

Constraints on Housing for Persons with Disabilities: The element indicates that group homes for seven or more persons are excluded from some zones that allow residential use (e.g., AP and GA Zones) and subjects the residential use to a special use permit. The element should specifically evaluate the exclusion from some zones allowing residential use and special use permit as a constraint on housing for persons with disabilities. For example, exclusion from some residential zones can limit housing opportunities and higher discretionary processes can be costly and impact timing and approval certainty. Based on a complete analysis, the element should add or modify programs to address identified constraints. For example, the element could add a program to allow these residential uses in all zones allowing residential uses and only subject to requirements of other residential uses of the same type in the same zone.

Requests for Lesser Densities: The element must analyze requests to develop housing at densities below those anticipated in the sites inventory, including hinderance on the construction of the RHNA. While the element describes typical densities, it should also discuss how those typical densities relate to assumptions in the inventory and evaluate any hinderances on constructing the RHNA.

C. Housing Programs

1. *Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. (Gov. Code, § 65583, subd. (c)(1).)*

As noted in Finding B3, the element does not include a complete site analysis, therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the County may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types. In addition, the element should be revised as follows:

- *Prior Identified Sites:* To utilize sites identified in prior planning period(s) toward the lower-income RHNA, the element must include a program to permit housing developments with 20 percent affordability without discretionary action and at appropriate densities (e.g., allow at least 10 units per acre). This program should have been implemented in the first year of the planning period. Since this year has lapsed, the element cannot be found in compliance until the appropriate zoning and procedures are completed.
 - *Program H 6.2 (Water and Sewer Infrastructure):* The Program should commit to discrete timing for assisting to seek funding (e.g., at least every other year and ongoing).
 - *Program H 4.1 (Transitional and Supportive Housing):* While the Program commits to revise zoning for transitional and supportive housing, it should also commit to amend zoning to comply with Government Code section 65651 for by right permanent supportive housing.
 - *Program H 4.2 (Emergency Shelters):* As noted in Finding B3, based on a complete analysis, the Program should commit to revise the definition of emergency shelters.
2. *Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)*

As noted in Finding B4, the element requires a complete analysis of potential governmental and nongovernmental constraints. Depending upon the results of that

analysis, the County may need to revise or add programs and address and remove or mitigate any identified constraints.

3. *Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics... (Gov. Code, § 65583, subd. (c)(5).)*

As noted in Finding B1, the element requires a complete AFFH analysis. Depending upon the results of that analysis, the County may need to revise or add programs. Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have specific commitment, geographic targeting, metrics and milestones and must address, as appropriate, housing mobility enhancement, new housing choices and affordability in relatively higher income and opportunity areas, place-based strategies for community revitalization and displacement protection. In addition, the element should be revised as follows:

- *Place-based strategies*: The element should include geographic targeting of Greenville where applicable such as Programs H 3.7, H 5.5, H 6.2, H 6.4. Additional programming elements should include targeted small-scale place-based strategies aimed at rebuilding community amenities and to target economic development strategies in Greenville.
 - *Greenville*: The element should include a geographically targeted approach for weatherization, rehabilitation within the community of Greenville to assist with rehabilitation and conservation of the housing stock.
 - *Program H 5.1 (Persons with Developmental Disabilities)*: The Program should commit to identify outreach opportunities at least every other year upon establishing an outreach program.
4. *The housing program shall preserve for low-income households the assisted housing developments identified pursuant to paragraph (9) of subdivision (a)... (Gov. Code, § 65583, subd. (c)(6).)*

Program H 2.3 (Preserve Assisted Units): The Program should commit to complying noticing requirements within 3 years and 6 months of the affordability expiration dates, in addition to coordinating with qualified entities such as nonprofit organizations and educating and assisting tenants.

5. *Develop a plan that incentivizes and promotes the creation of accessory dwelling units that can be offered at affordable rent... (Gov. Code, § 65583, subd. (c)(7).)*

Program H 2.1 (ADU): In addition to reviewing law annually and making revisions, the Program should commit to revising the ADU ordinance within six months of receiving findings from HCD.

D. Public Participation

Local governments shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the Housing Element, and the element shall describe this effort. (Gov. Code, § 65583, subd.(c)(9).)

While the County made considerable effort to include the public through workshops, moving forward, the County should employ additional methods for public outreach efforts in the future, particularly to include lower-income and special needs households and neighborhoods with higher concentrations of lower-income households. For example, the County could conduct targeted stakeholder interviews or establish a committee representative of lower-income households in future public outreach efforts. For additional information, see the Building Blocks at <https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/public-participation>.