

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

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April 2, 2020

Eli Naffah, City Manager  
City of Trinidad  
P.O. Box 390  
Trinidad, CA 95570

Dear Eli Naffah:

**RE: Review of the City of Trinidad's 6<sup>th</sup> Cycle (2019-2027) Draft Housing Element**

Thank you for submitting the City of Trinidad's (City) draft housing element received for review on March 20, 2020 along with revisions on March 31 and April 1 and 2, 2020. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review. In addition, HCD has expedited this review to facilitate meeting funding requirements.

The draft element, incorporating the revisions submitted, meets the statutory requirements of State Housing Element Law (Article 10.6 of Government Code). However, this finding is based on, among other things, Implementation Program HI-1 that commits to amend zoning to permit emergency shelters without discretionary action. The element cannot be found in full compliance until zoning is available to permit emergency shelters without discretionary action pursuant to Government Code section 65583, subdivision (a)(4)(A). The housing element will comply with State Housing Element Law when zoning is amended to permit emergency shelters without discretionary action and the element is adopted, submitted to, and approved by HCD, in accordance with Government Code section 65585, subdivision (g).

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City must continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available, while considering and incorporating comments where appropriate.

Government Code section 65588, subdivision (e)(4) requires a jurisdiction that does not adopt its housing element within 120 calendar days from the statutory due date to revise its element every four years until adopting at least two consecutive revisions by the applicable due dates. Trinidad did not meet the requirements of Government Code section 65588, subdivision (e)(4); therefore, it is subject to the four-year revision requirement until the adoption of at least two consecutive housing element updates by the applicable due dates. The next opportunity to adopt on time will be the four-year update due August 31, 2023.

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 Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities programs; and the ongoing SB 2 funding consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City will meet housing element requirements for these funding sources.

HCD appreciates the hard work and dedication provided in preparation of the housing element and looks forward to receiving the City of Trinidad's adopted housing element. If you have any questions or need additional technical assistance, please contact Paul McDougall, of our staff, at [paul.mcdougall@hcd.ca.gov](mailto:paul.mcdougall@hcd.ca.gov).

Sincerely,

A handwritten signature in black ink that reads "Shannan West". The signature is written in a cursive, flowing style.

Shannan West  
Land Use & Planning Manager