



HCAOG
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April 16, 2026

TO:

Board of Directors of the Humboldt County Association of Governments

FROM:

Brendan Byrd, Executive Director

SUBJECT: Written Determination Regarding RHNA Cycle 7 Appeal
Received by the City of Eureka

RHNA Background

The Regional Housing Needs Allocation (RHNA) is the state-mandated process to identify the number of housing units, by affordability level, that each jurisdiction must accommodate in the Housing Element of its General Plan. The California Department of Housing and Community Development (HCD) determined HCAOG communities must plan for 5,962 new housing units from 2027 to 2035, [based on a determination received on July 15th, 2025](#).

HCAOG convened a regional community development working group to advise staff on the methodology for allocating a share of the region's total housing need to every local government in Humboldt. The allocation must meet the statutory objectives identified in Government Code Section 65584.

At the HCAOG Board's regularly scheduled meeting on September 18th, 2025, the Board identified a draft preferred alternative RHNA allocation method. Afterwards, HCAOG initiated a 60-day public review period, which included sending the proposed method to HCD. The formal public review period ended in late November. Pursuant to California Code Section 65584.04(d), a public hearing was also held at the regularly scheduled November 20th, 2025, HCAOG Board meeting, to consider the proposed methodology further.

During the public hearing the Board received preliminary comments received from HCD regarding HCAOG's proposed allocation methodology. In summary, HCD noted that the absence of a direct variable in the method addressing statutory fair housing requirements '*raises some flags for potential concern.*' At the closure of the item at the public hearing, the Board directed HCAOG staff to work with the regional RHNA working group to draft updated RHNA methodology alternatives that remained generally consistent with the preferred alternative but included a direct process for addressing the statutory AFFH requirements.

On December 18th, 2025, the Board adopted a final draft allocation methodology for the Cycle 7 Regional Housing Needs Allocation (RHNA) process. At the meeting the Board chose to adopt Regional Allocation Alternative 2, which was one of three methods developed and presented to the Board to respond to anticipated State Housing and Community Development Department (HCD) comments regarding the lack of a metric in HCAOG's original methodology directly addressing RHNA Objective 5. With Alternative 2, the total number of housing units assigned to each

agency was based 50% each on an agency's proportion of regional jobs and population, and the placement of the below-moderate income RHNA across the region was based on a weighted methodology that considered both HCD Opportunity Score data, and work-based vehicle miles travelled (VMT). This methodology was modelled closely based on methodologies developed by other Councils of Governments (COGs) during RHNA Cycle 6, and [a full description of the adopted method and the associated data can be found on the HCAOG website.](#)

With the adoption of a method by the Board, staff submitted the final methodology to HCD. HCD's role in the RHNA process is to review the final draft allocation method adopted by COGs, and to make a determination on if the proposed methodology suitably 'furthers the five RHNA statutory objectives' listed in Government Code Section 65584(d). HCAOG received a transmittal letter from HCD, [dated February 12th, 2026](#), stating that the method adopted by the Board furthers the RHNA statutory objectives.

HCAOG RHNA Appeals Process

Following Board adoption of the methodology, and for a short period following HCAOG's receipt of the approval letter from HCD, HCAOG opened collectively a 40-day allocation appeal period, pursuant to Government Code Section 65584.05(b). HCAOG sent notifications to local agencies regarding appeals on the following dates:

1. December 19th, 2025. Notification of Adopted Methodology and Commencement of 30-Day Appeal Period.
2. February 18th, 2025. Issuance of Draft RHNA Allocation and Notification of Supplementary 10-day Appeal Period

[On January 15th, 2025, HCAOG received an appeal on the adopted RHNA methodology from the City of Eureka.](#) No other appeals were received. After the closure of the second appeal period, HCAOG sent notice to local agencies regarding appeals received, and provided a 10-day period for agencies to submit written comments on the appeal received by the City of Eureka. The written comment period closed on March 16th, 2026, at which time no written comments were received.

The HCAOG Board conducted a public hearing on the appeal received by the City of Eureka on March 19th, 2026.

HCAOG Board Appeals Hearing and Review

Per the process provided for in Government Code 65584.05 regarding RHNA appeals, the City of Eureka had an opportunity to present the basis for its appeal and provide information to support its arguments. The City of Eureka's appeal was heard by the HCAOG Board on March 19th, 2026, at a noticed public hearing. The City of Eureka requested a 'rebalancing' of their RHNA allocation, specifically regarding the overall percentage of below-moderate income household units allocated. During the hearing the City noted that a rebalancing of approximately 50-60 units is what would be required for the City to be assigned below-moderate income housing units consistent with the regional average. The City did not request an overall reduction or modification to the overall number of housing units allocated. HCD, other local jurisdictions, and the public had the opportunity to submit comments related to the appeal. As noted above, no additional comments were received prior to the public hearing.

The City of Eureka's appeal presentation was preceded by a presentation from staff, including several graphs in response to the claims made in the appeal from the City of Eureka. This supplementary material was included in the staff report for the item, which can be found on the [HCAOG website.](#)

After these presentations, members of the public had an opportunity to provide oral comments prior to discussion by the HCAOG Board. Public comments received generally expressed the sentiment that while the City should be commended for the work they have done on lower income housing, the Board should reject their request for appeal.

At the closure of the appeal presentation by the City of Eureka, City staff acknowledged that under the requirements of Government Code there is no fair or equitable way in which to adjust or rebalance the allocations resulting from the adopted methodology. As such, staff stated that they are no longer asking for the Board to consider an adjustment based on their filed appeal, and that in place they request that the Board return to an allocation method that places housing units for all affordability levels based on an income parity approach in RHNA Cycle 8. They also requested that, if fair housing goals are to be met, which is now a requirement under RHNA Statutory Objective 5, that a future methodology be developed that focuses placing housing of all income categories based on housing opportunity.

Video of the public hearing and the meeting minutes can be found at:

<https://www.hcaog.net/committee/100/Meeting-Archive>

HCAOG Board Decision

As noted above, the City of Eureka during the public hearing chose to voluntarily withdraw their appeal. Citing the withdrawal of the appeal by Eureka staff, the approval of the adopted methodology by HCD, and the information provided during the public hearing, **the HCAOG Board has chosen to deny the appeal filed on January 15th, 2026, by the City of Eureka.**

Furthermore, while the HCAOG Board (in addition to HCD) have found that the adopted HCAOG RHNA Cycle 7 allocation methodology further the five RHNA statutory objectives, **the Board has made the recommendation through this appeal that the HCAOG RHNA Cycle 8 process shall be initiated earlier in the Cycle and shall include mechanisms in the methodology to address housing opportunity and income parity across all RHNA income categories, providing for a more balanced allocation approach for all categories of housing affordability.**

Conclusions

For the foregoing reasons and based on the full record before the HCAOG Board at the close of the public hearing, the HCAOG Board hereby denies the City of Eureka's RHNA Cycle 7 appeal and finds that the City of Eureka's RHNA allocation is consistent with the RHNA statute pursuant to Section 65584.05(e)(1).