

# 2026 HUMBOLDT COUNTY REGIONAL HOUSING NEEDS ASSESSMENT PLAN



7<sup>th</sup> Cycle Housing Element

2027-2035

Adopted May 21, 2026



**Reserve for Board Resolution**

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## Introduction

The Humboldt County Association of Governments (HCAOG) is a Joint Powers Authority (JPA). Membership includes Humboldt County and the cities of Arcata, Blue Lake, Eureka, Ferndale, Fortuna, Rio Dell and Trinidad. As directed in State Government Code Section 65584, the Department of Housing and Community Development (HCD) determines the existing and projected housing need for distinct regions in the state. In consultation with HCD, HCAOG is required to adopt a Regional Housing Needs Plan (RHNP) that allocates a share of the regional housing need to each city and county.

HCAOG has prepared this Regional Housing Needs Allocation (RHNA) Plan to fulfill its mandated requirement to allocate by income category, each jurisdiction's "fair share" of projected housing needs for the period of June 30, 2027 through July 15, 2035. This period is the 7<sup>th</sup> RHNA cycle since the requirements began in 1981. Housing allocations are important components of the Housing Element updates of the County and seven cities in Humboldt County. Cities and Counties are not required to provide housing designated by the RHNA process. The RHNA is a distribution of housing capacity that each city and county must zone for in a planning period. It is not a construction need allocation.

## 7<sup>th</sup> RHNA Cycle Allocations

Development of this plan began with discussions with HCD in May of 2015. HCAOG received a final RHNA determination on July 15, 2015 (provided in Appendix A). HCAOG staff met with planning representatives on a regular basis from May through January. The HCAOG Board discussed the RHNA process and methodology in monthly meetings beginning in July. HCAOG's final draft methodology was adopted at a public hearing on December 18, 2015. As indicated in the final determination from HCD, the 8-year projection period begins June 30, 2027 and ends July 15, 2035. The allocation is based on the California Department of Finance projections, in addition to a number of housing unit adjustments required by HCD. The state-mandated RHNA process (Government Code Sections 65580 *et seq.*) requires HCAOG to develop a methodology that determines how to divide and allocate an overall allocation that the region receives from the state to local jurisdictions. HCD's housing need determination is as follows:

### HCD Final RHNA Determination for Humboldt County

| Income Category | Percent       | Housing Unit Need |
|-----------------|---------------|-------------------|
| Acutely Low     | 9.4%          | 562               |
| Extremely Low   | 14.5%         | 866               |
| Very-Low*       | 10.5%         | 627               |
| Low             | 17.8%         | 1,064             |
| Moderate        | 9.5%          | 565               |
| Above-Moderate  | 38.2%         | 2,278             |
| <b>Total</b>    | <b>100.0%</b> | <b>5,962</b>      |

At a noticed public hearing, the HCAOG Board adopted a RHNA methodology at their December 18<sup>th</sup>, 2015 Board meeting. Step 1 of the methodology utilized available population and employment data, using equal weighting of 50% each, in order to calculate the total number of housing units assigned to each agency. Step 2 of the Methodology assigned below-moderate income units to each agency, based 70% on an agency's work-based Vehicle Miles Travelled (VMT), and 30% based on a regions area-weighted HCD Opportunity Score. The final allocations are summarized in the following tables.

### Final 2026 Overall RHNA Unit Allocation (Step 1)

| Jurisdiction  | LEHD Employment Data (2022) | DOF Population (1/1/2025) | Jobs Distribution | Population Distribution | Jobs-Pop 50-50 Split Allocation % | RHNA         |
|---------------|-----------------------------|---------------------------|-------------------|-------------------------|-----------------------------------|--------------|
| Arcata        | 9,839                       | 19,001                    | 20.7%             | 14.2%                   | 14.2%                             | 1,042        |
| Blue Lake     | 252                         | 1,136                     | 0.5%              | 0.8%                    | 0.8%                              | 41           |
| Eureka        | 18,424                      | 26,122                    | 38.8%             | 19.5%                   | 19.5%                             | 1,740        |
| Ferndale      | 427                         | 1,361                     | 0.9%              | 1.0%                    | 1.0%                              | 57           |
| Fortuna       | 3,300                       | 12,198                    | 7.0%              | 9.1%                    | 9.1%                              | 479          |
| Rio Dell      | 359                         | 3,232                     | 0.8%              | 2.4%                    | 2.4%                              | 95           |
| Trinidad      | 330                         | 296                       | 0.7%              | 0.2%                    | 0.2%                              | 27           |
| County        | 14,501                      | 70,471                    | 30.6%             | 52.7%                   | 41.6%                             | 2,481        |
| <b>Totals</b> | <b>47,432</b>               | <b>133,817</b>            | <b>100%</b>       | <b>100%</b>             | <b>100%</b>                       | <b>5,962</b> |

### Final 2026 RHNA by Income Category (Step 2)

| Jurisdiction        | Acutely Low | Extremely Low | Very Low | Low Income | Moderate Income | Above Moderate | Proposed Total RHNA Allocation |
|---------------------|-------------|---------------|----------|------------|-----------------|----------------|--------------------------------|
| Arcata              | 103         | 160           | 117      | 206        | 89              | 367            | 1,042                          |
| Blue Lake           | 3           | 7             | 4        | 8          | 4               | 15             | 41                             |
| Eureka              | 179         | 267           | 193      | 328        | 154             | 619            | 1,740                          |
| Ferndale            | 6           | 9             | 7        | 11         | 5               | 19             | 57                             |
| Fortuna             | 50          | 75            | 53       | 93         | 44              | 164            | 479                            |
| Rio Dell            | 7           | 11            | 6        | 16         | 10              | 45             | 95                             |
| Trinidad            | 3           | 4             | 3        | 5          | 6               | 6              | 27                             |
| County              | 211         | 333           | 244      | 397        | 253             | 1,043          | 2,481                          |
| <b>RHNA TARGETS</b> |             |               |          |            |                 |                | <b>5,962</b>                   |

## Allocation Comparisons

The methodology used by HCD in determining the overall RHNA determination is based on projected population and projected households for Humboldt County. As noted further in the preceding sections, HCD also applies additional units to correct for

overcrowding, low vacancy rates, cost burden rates, homelessness, jobs/housing balance, and demolition rates. A more detailed explanation is included in HCD's RHNA Determination letter provided in Appendix A.

Of note, although HCD has cited a relatively flat, if not decreasing trend in population over the next 8 years, their methodology calls for the planning of 5,962 housing units in the planning period. Additionally, as compared to Cycle 6, HCD's overall allocation percentage of units for below-moderate income increased by over 10%. A comparison of HCAOG's RHNA Determination for the last four cycles is provided below.

### Comparison of HCAOG's RHNA Allocations

| RHNA Cycle      | Very Low and Below |       | Low   |       | Moderate |       | Above Moderate |       | Total Units |
|-----------------|--------------------|-------|-------|-------|----------|-------|----------------|-------|-------------|
|                 | %                  | Units | %     | Units | %        | Units | %              | Units |             |
| 4 <sup>th</sup> | 24.8%              | 1,175 | 16.0% | 762   | 17.4%    | 825   | 41.8%          | 1,985 | 4,747       |
| 5 <sup>th</sup> | 24.4%              | 500   | 15.7% | 320   | 17.0%    | 350   | 42.9%          | 890   | 2,060       |
| 6 <sup>th</sup> | 24.4%              | 829   | 15.7% | 532   | 18.1%    | 613   | 41.8%          | 1,416 | 3,390       |
| 7 <sup>th</sup> | 34.4%              | 2,055 | 17.8% | 1,064 | 9.5%     | 565   | 38.2%          | 2,278 | 5,962       |

The 7<sup>th</sup> cycle allocation has increased significantly since the 6<sup>th</sup> Cycle, and annualized is the largest RHNA cycle in Humboldt County since Cycle 2, as shown in the table below.

### Comparison of RHNA Cycle Planning Periods

| RHNA Cycle | Planning Period (PP)  | HCD Allocation/PP | Annualized RHNA |
|------------|-----------------------|-------------------|-----------------|
| Cycle 2    | 12/31/90-06/30/97     | 5,984/6.5 years   | 921/year        |
| Cycle 3    | 12/31/00-06/30/08     | 3,975/7.5 years   | 530/year        |
| Cycle 4    | 12/31/06-06/30/14     | 4,747/7.5 years   | 633/year        |
| Cycle 5    | 12/31/13-06/30/19     | 2,060/5.5 years   | 375/year        |
| Cycle 6    | 12/31/18-08/31/27     | 3,390/8.7 years   | 390/year        |
| Cycle 7    | 6/30/2027 – 7/15/2035 | 5,962/8 years     | 745/year        |

## Cycle 6 RHNA Progress

HCAOG's RHNA Plan establishes housing development targets for member city and county state-mandated Housing Element Updates. Each of the seven incorporated cities and the County of Humboldt unincorporated area are required to update their Housing Element to accommodate adequate general plan and zoning capacity for their allocation by income. It is up to each local government to plan where and how the allocated housing units will be developed in their communities.

All California cities and counties are required by Government Code (Sections 65580-65590) to adopt housing elements as part of their general plans. A city or county that does not adopt its housing element within 120 days after the due date (July 15, 2027) will be required to revise its housing element every four years on time, rather than every eight for at least two consecutive revisions (Section 65588(e)(4)). Cities and counties that have not yet adopted a housing element in the current cycle can also not disapprove an affordable housing development that does not comply with the general plan and zoning (Section 65589.5(d)(5)).

Progress made toward RHNA (completed housing units), by income category, since the last RHNA cycle is provided for those agencies that have reported their permit history to HCD, as of 2024. The reported data, as available on HCD’s Housing Element APR Dashboard, is shown below for each reporting agency.

| <b>City of Arcata</b>        | <b>Permits</b> | <b>Cycle 6 RHNA</b> |
|------------------------------|----------------|---------------------|
| <b>Very Low Income</b>       | 167            | 142                 |
| <b>Low Income</b>            | 90             | 95                  |
| <b>Moderate Income</b>       | 144            | 111                 |
| <b>Above Moderate Income</b> | 104            | 262                 |

| <b>City of Blue Lake</b>     | <b>Permits</b> | <b>Cycle 6 RHNA</b> |
|------------------------------|----------------|---------------------|
| <b>Very Low Income</b>       | 0              | 7                   |
| <b>Low Income</b>            | 0              | 4                   |
| <b>Moderate Income</b>       | 1              | 5                   |
| <b>Above Moderate Income</b> | 10             | 7                   |

| <b>City of Eureka</b>        | <b>Permits</b> | <b>Cycle 6 RHNA</b> |
|------------------------------|----------------|---------------------|
| <b>Very Low Income</b>       | 8              | 231                 |
| <b>Low Income</b>            | 67             | 147                 |
| <b>Moderate Income</b>       | 38             | 172                 |
| <b>Above Moderate Income</b> | 85             | 402                 |

| <b>City of Ferndale (2025)</b> | <b>Permits</b> | <b>Cycle 6 RHNA</b> |
|--------------------------------|----------------|---------------------|
| <b>Very Low Income</b>         | 0              | 9                   |
| <b>Low Income</b>              | 11             | 5                   |
| <b>Moderate Income</b>         | 9              | 6                   |
| <b>Above Moderate Income</b>   | 10             | 13                  |

| <b>City of Fortuna</b>       | <b>Permits</b> | <b>Cycle 6 RHNA</b> |
|------------------------------|----------------|---------------------|
| <b>Very Low Income</b>       | 0              | 73                  |
| <b>Low Income</b>            | 8              | 46                  |
| <b>Moderate Income</b>       | 85             | 51                  |
| <b>Above Moderate Income</b> | 119            | 120                 |

| <b>City of Rio Dell</b>      | <b>Permits</b> | <b>Cycle 6 RHNA</b> |
|------------------------------|----------------|---------------------|
| <b>Very Low Income</b>       | 27             | 12                  |
| <b>Low Income</b>            | 6              | 8                   |
| <b>Moderate Income</b>       | 2              | 9                   |
| <b>Above Moderate Income</b> | 4              | 22                  |

| <b>City of Trinidad</b>      | <b>Permits</b> | <b>Cycle 6 RHNA</b> |
|------------------------------|----------------|---------------------|
| <b>Very Low Income</b>       | 0              | 4                   |
| <b>Low Income</b>            | 0              | 4                   |
| <b>Moderate Income</b>       | 0              | 3                   |
| <b>Above Moderate Income</b> | 1              | 7                   |

| <b>County of Humboldt</b>    | <b>Permits</b> | <b>Cycle 6 RHNA</b> |
|------------------------------|----------------|---------------------|
| <b>Very Low Income</b>       | 103            | 351                 |
| <b>Low Income</b>            | 44             | 223                 |
| <b>Moderate Income</b>       | 288            | 256                 |
| <b>Above Moderate Income</b> | 366            | 583                 |

## **State Housing Law**

State law requires each city and county to adopt a general plan. The housing element is one of the seven mandated elements of the local general plan. Housing element law, enacted in 1969, mandates that local governments adequately plan to meet the existing and projected housing needs of all economic segments of the community. The housing elements of all general plans are reviewed by HCD to ensure compliance with State law. The allocation of housing need to a jurisdiction is a key component of the housing element. The State is required to allocate the region’s share of the statewide housing need to Councils of Governments (COG) based on Department of Finance population (DOF) projections and regional population forecasts used in preparing regional transportation plans. The region’s COG, HCAOG in Humboldt County, is then required to develop a RHNA Plan to describe the region’s allocation method and determine a final allocation of housing need to the jurisdictions in the region (Government Code, Sections 65584 et seq). Recently passed Assembly Bills 1771 and 2238, effective January 1, 2019, amended RHNA legislation that affected Humboldt County in the 7<sup>th</sup> RHNA cycle. Additional legislative actions from 2021-2024 also updated RHNA statute, and during that period HCD released the updated Statewide Housing Plan. HCAOG’s methodology was approved consistent with current legislation.

State law requires that the final RHNA Plan shall be consistent with the following objectives:

- (1) Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low- and very low-income households.
- (2) Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region’s greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.

- (3) Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.
- (4) Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the countywide distribution of households in that category from the most recent American Community Survey.
- (5) Affirmatively furthering fair housing.

Consistent with these objectives, the adopted methodology utilized in this plan seeks to increase housing opportunity with a mix of housing types, tenure and affordability in all jurisdictions within the region by allocating units to each jurisdiction in each income category. Existing data of income categories for each jurisdiction, compiled by HCD, is provided in Appendix B. Jurisdictions must plan and zone accordingly for different levels of density, thus making different product types available for development. Higher density zoning offers the option of providing more affordable units.

## **Methodology Process, Alternatives Considered**

The mandated 60-day Public Notice for the 7<sup>th</sup> Regional Housing Needs Methodology began on September 19<sup>th</sup>, 2025. The HCAOG Board discussed the methodology at their meeting in September and held a noticed Public Hearing on November 20<sup>th</sup>, 2025. Planning representative coordinated this cycle from May through January 2025/26. The final methodology was adopted at their December 18<sup>th</sup>, 2025 meeting. All jurisdictions were notified of the draft RHNA on December 19<sup>th</sup>, 2025. There was one appeal received by the City of Eureka regarding the adopted methodology, that appeal is discussed further in a subsequent section.

Consistent with California Government Code Section 65584.04(b), HCAOG surveyed each member jurisdiction to request information regarding the factors listed in California Government Code Section 65584.04(d), provided below. In accordance with the law, HCAOG sought to obtain the survey information in a manner and format that is comparable throughout the region and utilize readily available data to the extent possible. The law also states that none of the information received in response to the survey may be used as a basis for reducing the total housing need established for the region. Three out of the eight jurisdictions in the region (Ferndale, Arcata, and Trinidad) responded to the survey. Discussions with planning staff from jurisdictions in the region emphasized that similar to prior RHNA cycles, the only readily available data comparable throughout the region are population and employment data. The source information for this data used in the methodology alternatives is posted on HCAOG's website and will be provided to anyone upon request.

California Government Code Section 65584.04(d) indicates that the following factors be considered in developing the methodology:

**(1) The jurisdiction's existing and projected jobs and housing relationship**

*No specific local data is available or was received from local agencies. By using DOF and Census Bureau jobs and housing data, the proposed methodology will continue to focus on locating housing near existing and future employment opportunities.*

**(2) Constraints due to sewer, water, developable land suitability or preservation issues, emergency evacuation route capacities, or climate change risks**

*Only the City of Trinidad noted specific utility constraints for sewer. The proposed methodology would allocate few units to Trinidad, given their low population and percentage of regional employment. Several agencies noted a lack of vacant developable land within their existing City limits. In tandem with the regional emphasis on infill, future units will need to be on sites that are zoned for higher densities in the future, or local agencies may have to pursue annexations.*

**(3) The distribution of household growth that provide opportunities to maximize the use of public transportation and existing transportation infrastructure**

*Local agencies have identified infill development as a top priority as a means to maximize the use of existing utility and service infrastructure.*

**(4) The market demand for housing**

*No local agencies track this data internally or provided to HCAOG for consideration. Housing demand rates were reviewed based on data from the American Community Survey. In general all local agencies experience below national-standard vacancy rates for both owner occupied and rental housing units. By allocating housing units to all agencies based on population, housing stock in all agencies can grow and contribute towards reducing housing costs and improve housing availability.*

**(5) Agreements between a county and cities in a county to direct growth toward incorporated areas of the county, or ballot approved measures to preserve agricultural land**

*No local agencies have such agreements in place.*

**(6) The loss of units contained in assisted housing developments**

*No local agencies indicated this issue.*

**(7) High housing cost burdens (specifically those households spending over 30% of their income on housing)**

*No local agencies track this data internally or provided to HCAOG for consideration. Housing cost-burden rates were reviewed based on data from the American Community Survey. In general all local agencies experience above average cost burden rates for both owner occupied and rental housing units. By allocating housing units to all agencies based on population, housing stock in all agencies can grow and contribute towards reducing housing costs and improve housing availability.*

**(8) The rate of overcrowding**

*In general overcrowding was identified as a smaller issue in Humboldt, and no local agencies provided specific data for use outside of the American Community Survey. Allocating housing units to all agencies based on jobs and population, to address cost-burden and vacancy issues, will also serve to remedy any regional overcrowding issues.*

**(9) The housing needs of farmworkers**

*Farmworker housing was identified as a factor more effecting communities in the Eel River Valley (Ferndale, Fortuna, County). Allocating units to local agencies based on population and existing employment will ensure some housing is developed for farmworkers in key areas within the County.*

**(10) Housing needs generated by the presence of Cal Poly Humboldt.**

*Housing needs of Cal Poly Humboldt Students was primarily identified as a need in the Arcata and McKinleyville area, with Eureka also serving as a proximal location with robust transportation services. The proposed methodology allocates units based on jobs and population, and as such approximately 91% of total units, through the housing element process, could be located with convenient access to Cal Poly Humboldt for future students or employees. Additionally, Cal Poly Humboldt has completed the Campus Physical Plan, which calls for the development of approximately 2,400 additional bed-spaces in Arcata (which is in addition to the recently completed Hinarr Hu Moulik Housing complex, which when fully complete will provide 964 bed spaces).*

**(11) The housing needs for individuals and families experiencing homelessness**

*The determination issued to Humboldt includes adjustments for homelessness based on Point-in-Time Counts. Based on this data, Eureka, the County, and Arcata have approximately 91% of the total population of people experiencing homelessness. The proposed allocation methodology will allocate approximately 89% of the total regional units to these agencies.*

**(12) The loss of housing units because of a state-declared emergency**

*No local agencies cited this as an issue that needed to be addressed through the RHNA process.*

**(13) Local/regional constraints or policies relating to regional greenhouse gas emissions reduction targets**

*No current constraints or policies exist. The region's Regional Transportation Plan (RTP) and draft Climate Action Plan both call out housing unit infill within existing urbanized areas as a regional housing priority. Including the County, which has a significant portion of the urbanized area of Eureka in addition to McKinleyville, the proposed allocation methodology assigns approximately 96% of total allocated housing units to agencies with existing urbanized infill areas.*

After the November 20<sup>th</sup> meeting, staff began developing final draft updated allocation method alternatives that included direct strategies that address RHNA Objective 5. After reviewing a number of Regional Housing Needs Plans from other COG's, staff developed three alternatives which are discussed further below. In these alternatives there are a number of variables new to the HCAOG RHNA project that are introduced including opportunity score, work-based vehicle miles travelled (VMT), and income parity adjustment, each of which is explained below.

- **Opportunity Score**

Opportunity score is a composite variable that is very commonly used during the RHNA process (subsequent to 2018) to directly address AFFH requirements. Originally, opportunity scores and mapping were developed by the California Tax Credit Allocation Committee, however HCD has made an updated version of this data which is what was used in the updated alternatives. Opportunity scores are indexed variables that include data such as access to quality schools, education levels, incomes (including percentage in poverty), and median property values. Higher opportunity scores are associated with areas that have good schools, high resident education levels, higher incomes, and higher property values, among other characteristics.

- **Work-Based VMT**

Work-based VMT is a per capita measurement on daily driving distance to- and from work. For each jurisdiction, data was obtained from the Fehr and Peers VMT Index tool, which uses StreetLight Data. Work-based VMT was selected over total VMT, as this metric is seen as more accurately capturing the transportation necessity of housing location (as opposed to discretionary driving trips).

- **Income Parity Adjustment**

This variable aims to accomplish a similar result as the 'regional average housing stock' adjustment applied in previous HCAOG RHNA cycles. Based on income data from the American Community Survey, this variable assesses the difference between an agencies housing stock in any income category versus the regional average. This variable is used in the methods below to help balance housing stock by income level in each agency, helping to ensure that no one agency is allocated too many or too few units in any income category.

The following section presents the allocation method alternatives developed by HCAOG and considered by the regional RHNA working group and the HCAOG Board. For each alternative a brief description is provided in addition to a summary table that shows how many total units in each income category would be assigned to each agency. A table that summarizes all alternatives together, including the original preferred alternative, is included as an attachment.

**Alternative 1:** Weighting jobs at 50%, population at 40%, and opportunity score at 10% to allocate a total number of units to each agency. Allocate units per income category to each agency based on the regional average +/-20% of the agency's variance from the regional average.

For Alternative 1, the proposed weighting for opportunity score is 10%, which is achieved by reducing the population weighting (from previously approved RHNA cycles) by 10%. The portion of the allocation methodology that assigned units to each agency based on income parity levels would remain the same as performed in previous HCAOG RHNA cycles. The resulting table using this method is shown in the table below.

**Unit allocation summary for Alternative Method 1.**

| <b>Jurisdiction</b> | <b>Acutely Low</b> | <b>Extremely Low</b> | <b>Very Low</b> | <b>Low</b> | <b>Moderate</b> | <b>Above Moderate</b> | <b>Total Allocation</b> |
|---------------------|--------------------|----------------------|-----------------|------------|-----------------|-----------------------|-------------------------|
| <b>Arcata</b>       | 92                 | 137                  | 104             | 203        | 103             | 419                   | 1,058                   |
| <b>Blue Lake</b>    | 3                  | 8                    | 5               | 8          | 4               | 18                    | 46                      |
| <b>Eureka</b>       | 172                | 254                  | 175             | 302        | 168             | 639                   | 1,710                   |
| <b>Ferndale</b>     | 8                  | 6                    | 6               | 10         | 5               | 23                    | 58                      |
| <b>Fortuna</b>      | 45                 | 70                   | 50              | 94         | 46              | 175                   | 480                     |
| <b>Rio Dell</b>     | 8                  | 13                   | 7               | 15         | 9               | 35                    | 87                      |
| <b>Trinidad</b>     | 4                  | 5                    | 6               | 8          | 3               | 6                     | 32                      |
| <b>County</b>       | 230                | 373                  | 274             | 424        | 227             | 963                   | 2,491                   |
| <b>Total</b>        | 562                | 866                  | 627             | 1,064      | 565             | 2,278                 | 5,962                   |

**Alternative 2:** Weighting jobs at population at 50% to allocate a total number of units to each agency. Allocate below-moderate housing units to agencies based on opportunity score (30%) and work-based VMT (70%). Allocate moderate and above-moderate units based on regional average.

In Alternative 2 the total number of units assigned to each agency would remain the same as previous HCAOG RHNA cycles and would be calculated by weighting an agency's jobs and population at 50% each. Alternative 2 would address statutory AFFH requirements by including agency opportunity score and work-based VMT in the step of the allocation method that assigns the number of below-moderate income (acutely-, extremely, very- and low income) housing units to each agency. The proposed weighting for opportunity score is 30%, and the proposed weighting for VMT is 70%. In addition to the weighting, each agency gets an additional adjustment based on the variance between an agency's opportunity score or VMT, relative to the regional average. The resulting table using this method is shown in the table below.

**Unit allocation summary for Alternative Method 2.**

| Jurisdiction | Acutely Low | Extremely Low | Very Low   | Low          | Moderate   | Above Moderate | Total Allocation |
|--------------|-------------|---------------|------------|--------------|------------|----------------|------------------|
| Arcata       | 105         | 163           | 118        | 200          | 91         | 365            | 1,042            |
| Blue Lake    | 4           | 6             | 4          | 8            | 4          | 15             | 41               |
| Eureka       | 174         | 269           | 194        | 330          | 154        | 619            | 1,740            |
| Ferndale     | 6           | 9             | 7          | 11           | 4          | 20             | 57               |
| Fortuna      | 50          | 75            | 54         | 92           | 41         | 167            | 479              |
| Rio Dell     | 7           | 11            | 8          | 14           | 11         | 44             | 95               |
| Trinidad     | 3           | 4             | 3          | 5            | 2          | 10             | 27               |
| County       | 213         | 329           | 239        | 404          | 258        | 1,038          | 2,481            |
| <b>Total</b> | <b>562</b>  | <b>866</b>    | <b>627</b> | <b>1,064</b> | <b>565</b> | <b>2,278</b>   | <b>5,962</b>     |

**Alternative 3:** Weighting jobs at population at 50% to allocate a total number of units to each agency. Allocate below-moderate units to agencies based on opportunity score (33.3%), income parity adjustment (33.3%) and work-based VMT (33.3%). Allocate moderate and above-moderate units based on regional average.

Alternative 3 is largely the same as Alternative 2. The sole difference is the inclusion of an additional variable, income parity adjustment, into the portion of the methodology that allocates the below moderate income units to each agency. In this alternative the weighting for the income parity adjustment, VMT and opportunity score are all equal at 33.3%. The resulting table using this method is shown in the table below.

**Unit allocation summary for updated Alternative Method 3.**

| Jurisdiction | Acutely Low | Extremely Low | Very Low | Low | Moderate | Above Moderate | Total Allocation |
|--------------|-------------|---------------|----------|-----|----------|----------------|------------------|
| Arcata       | 105         | 161           | 116      | 199 | 92       | 369            | 1,042            |
| Blue Lake    | 4           | 7             | 5        | 8   | 3        | 14             | 41               |
| Eureka       | 164         | 252           | 183      | 310 | 165      | 666            | 1,740            |
| Ferndale     | 6           | 9             | 6        | 11  | 5        | 20             | 57               |
| Fortuna      | 48          | 74            | 53       | 90  | 43       | 171            | 479              |
| Rio Dell     | 7           | 11            | 8        | 13  | 44       | 45             | 95               |
| Trinidad     | 3           | 5             | 4        | 6   | 2        | 7              | 27               |
| County       | 225         | 347           | 252      | 427 | 244      | 986            | 2,481            |

|              |     |     |     |       |     |       |       |
|--------------|-----|-----|-----|-------|-----|-------|-------|
| <b>Total</b> | 562 | 866 | 627 | 1,064 | 565 | 2,278 | 5,962 |
|--------------|-----|-----|-----|-------|-----|-------|-------|

## Adopted Methodology and Data Sources

At their regularly scheduled meeting on December 18<sup>th</sup> 2025, the HCAOG Board adopted Alternative Method 2 for Humboldt County’s Cycle 7 RHNA allocations. After Board adoption, the methodology was submitted to HCD for review and approval. On February 12<sup>th</sup> 2026 HCD notified HCAOG that the adopted RHNA methodology is consistent with and advances the goals of the five RHNA statutory objectives (the adoption letter is included as an attachment). The adopted methodology is presented in detail in the remainder of this section.

### Adopted Allocation Method 2

#### Step 1

HCAOG has adopted a two-step methodology that first assigns a total number of units to a local agency based on weighted factors, with the second step distributing those units to each agency in each income category. Each step in the method, in addition to how this method satisfies the RHNA Objectives is discussed in further detail below.

The first step assigns the total number of units to each agency based on the agency’s percentage of total County population, and percentage of total county employment opportunities (jobs). Both of these factors have been used in Humboldt’s past RHNA cycles, and are based on robust data available from agencies such as the Department of Finance and the U.S. Census Bureau. The general method equation used in this first step in the RHNA allocation is shown below:

$$\text{Total Agency Allocation} = WF_{pop}(\% \text{ regional population}) + WF_{jobs}(\% \text{ regional jobs})$$

**Where:**  $WF_{pop}$  = weighting factor applied to population

$WF_{jobs}$  = weighting factor applied to jobs

The first factor described below is the measurement of existing population. The population data used comes from the California Department of Finance (DOF), [Table P-2A \(Total Population for California and Counties\)](#). By allocating a percentage of units to each agency based on their existing regional population, Humboldt’s RHNA methodology:

- Increases the housing supply in all City’s in an equitable manner based on readily available data (**Objective 1**).
- Provides for new housing opportunity in all regional agencies, including small high opportunity cities with less robust employment markets (including high-resource communities) (**Objective 5**).

- Addresses Humboldt’s Regional Housing Needs Determination (RHND). The RHND received from HCD on July 15, 2025 indicated that the majority of new housing needs across the region over the 8-year planning period are in response to the regions low vacancy rates and high cost burdens, as discussed further below.

As noted above the majority of new housing allocated to the region is a result of vacancy rate and cost burden adjustments. The adjustments result in 4,870 of the 5,962 units assigned to the region, about 83% of the allocation overall. Further exploration of available cost burden and vacancy rate data within the region suggested that lower than average vacancy rates and high cost-burdens are a universal issue across all the county’s jurisdictions. Given that low vacancy rates and high cost-burdens are in general an indicator of low housing supply/availability, HCAOG is proposing to allocate housing to all jurisdictions based on their 2025 estimated population, and weighting the population factor ( $WF_{pop}$ ) at 50%. Taking this initial step in the allocation methodology will ensure that Humboldt sub-regional allocations address this issue, which has been determined by the state (through Humboldt’s RHND) to be the single largest issue facing the region’s housing market.

The second factor used in HCAOG’s sub-regional allocation methodology is total jobs within each jurisdiction. The data on regional jobs comes from the [LEHD Origin-Destination Employment Statistics \(LODES\), developed by the U.S. Census Bureau.](#) The data can be accessed from the OnTheMap tool, and is a measurement of employment opportunities at a jurisdictional level. The jobs factor is proposed to be weighted at 50%. By allocating a percentage of units to each agency based on existing *regional jobs*, Humboldt’s RHNA methodology:

- Promotes further infill development and socioeconomic equity, by prioritizing the placement of new housing units within the region’s existing jobs centers (**Objective 2**)
- Furthers the region’s greenhouse gas reduction targets by allocating more housing into existing job centers, recognizing that the region’s highest GHG reduction priority is to reduce GHG emissions from vehicle trips (and most vehicle trips come from employment needs) (**Objective 2**)
- Improves the region’s jobs and housing mix, by allocating more housing into jurisdictions with more available employment (**Objective 3**)

## Step 2

The second step in the sub-regional allocation is to take the results of the allocation method noted above and assign household unit allocations to each jurisdiction in each of the six (6) income categories (ranging from Acutely Low to Above-Moderate). The

first part of this process is to calculate for each agency the total number of below-moderate income units. This is first accomplished using the equation below:

$$\begin{aligned} & \textbf{Total Agency Assignment of Below Moderate Income Housing} \\ & = \textit{RHND Low Income Housing Percentage} \times \textit{Total Agency Allocation} \\ & \pm \textit{Opportunity Score Adjustment} \pm \textit{VMT Adjustment} \end{aligned}$$

**Where:** Opportunity Score Adjustment = Opportunity Weight Factor x Total Jurisdictional Below Moderate Housing x (1 ± Regional Opportunity Score Variance)

**And:** VMT Adjustment = <sub>VMT</sub> Weight Factor x Total Jurisdictional Below Moderate Housing x (1 ± Regional VMT Variance)

As shown above there are two additional variables introduced into the methodology at this step, Opportunity Score and VMT. The Opportunity Score metric is recommended for use by the Department of Housing and Community Development, and for this analysis HCAOG used the version published by HCD ([AFFH Data Viewer 3.0](#)). The 'COG Geography Composite Opportunity Scores were used for each agency, and average Opportunity Scores were calculated for each agency using an area-weighted average within each agency's jurisdictional boundary. Lastly, the variances were calculated as a simple variance between any single agency's opportunity score, vs the total average opportunity score of all agencies within the county. The Opportunity Scores and variance results are shown in the tables at the end of this document.

The next variable is Vehicle Miles Travelled (VMT). For this metric, VMT's were obtained from the [Fehr and Peer VMT Index Mapping Tool](#), which is a GIS mapping tool that has developed VMT projections on the Census Tract level based on StreetLight data. For the RHNA allocation, the work-based VMT options were selected (over total household VMT), as HCAOG felt that this better represented transportation necessity, as opposed to discretionary transportation. Lastly, regional VMT variances were calculated in the same method as noted above for Opportunity Score, and all results are shown in the table at the end of this document.

For RHNA Cycle 7, the Opportunity Weight Factor was assigned a value of 30%, and the VMT Weight Factor was 70%. HCAOG felt that this weighting distribution appropriately captured the region's desire to advance housing opportunity and equity, while preserving local natural resources, reducing urban sprawl, and reducing greenhouse gas emissions through the transportation system. The final step in calculating the total number of below-moderate income units for each agency is the apply a small universal correction factor so that the sum total of the agency jurisdictions matches the RHND. The universal adjustment required to achieve this balance was 1.6%.

Next, the above moderate income housing units are calculated for each agency by subtracting the total number of below-moderate income housing units from the agency's total unit allocation, calculated in Step 1 above.

The final step in assigning housing units per income level to each agency is to multiply the total number of below- or above moderate housing units by the allocation percentages reported in the table in Attachment 1 of the Final Regional Housing Needs Determination (dated July 15<sup>th</sup>, 2025). In performing this final step, a final adjustment is applied which is equal to 10% of the difference from the agency's household unit category in any income category and the regional average in that income category. This final adjustment ensures that as the allocations are placed into each agency, it is done so in an effort to not over-concentrate any one income category in each agency. Using the method, variables, and weighting outlined in Step 2 above, HCAOG's RHNA allocation method addresses the RHNA objectives by:

- Assigning units of all housing types, tenure, and affordability to each jurisdiction **(Objective 1)**
- Assigning below-moderate income housing units favoring agency's with lower than average regional VMT, thereby promoting housing affordability equity in job centers, promoting infill, and reducing regional GHG emissions **(Objectives 1-3)**
- Accounting for an agency's existing housing stock based on income levels, and adjusting the allocation as compared to the regional average to prevent overconcentration **(Objective 4)**
- Assigning below-moderate income housing units favoring agency's with high mapped housing opportunity scores, thereby furthering fair housing goals **(Objective 5)**

The results of the second step in the allocation methodology is also shown in the following tables.

**Summary of Opportunity Scores and variances per agency.**

| <b>Agency</b>         | <b>AFFH Opportunity Score (Area Weighted to Agency Boundary)</b> | <b>Variance From Regional Average</b> |
|-----------------------|--|---------------------------------------|
| Arcata                | 6.83   | 16%                                   |
| Blue Lake             | 8.97   | 52%                                   |
| Eureka                | 3.57   | -39%                                  |
| Ferndale              | 6  | 2%                                    |
| Fortuna               | 5.01   | -15%                                  |
| Rio Dell              | 3  | -49%                                  |
| Trinidad              | 9  | 53%                                   |
| Unincorporated County | 4.79   | -19%                                  |

**Summary of Opportunity Scores and variances per agency.**

| <b>Agency</b>         | <b>Work Based VMT</b> | <b>Variance From Regional Average (times -1)</b> |
|-----------------------|-----------------------|--|
| Arcata                | 12.2                  | 2%   |
| Blue Lake             | 14.7                  | -19%   |
| Eureka                | 9.5                   | 23%  |
| Ferndale              | 11                    | 11%  |
| Fortuna               | 10.5                  | 15%  |
| Rio Dell              | 13.4                  | -8%  |
| Trinidad              | 14.7                  | -19%   |
| Unincorporated County | 13.2                  | -6%  |

**Summary of methodology calculations to determine below- and above-moderate income units per agency.**

| Factor Weighting      | Opportunity       | 30%                               | VMT                  | 70%   |                           |              |   | 2%   |   |   |
|-----------------------|-------------------|-----------------------------------|----------------------|---|---------------------------|--------------|---|--|---|---|
|                       | A                 | B                                 | C                    | D   | E                         | F            | G   | H  | I   | J   |
| Agency                | Lower Income RHNA | Opportunity Variance Weight (30%) | Opportunity Variance | Lower Income RHNA Units per Opportunity Variance Adjustment | VMT Variance Weight (70%) | VMT Variance | Lower Income RHNA Units per VMT Variance Adjustment | Total Preliminary Adjusted Low Income RHNA (includes Opportunity + VMT Adjustment) | Final Adjusted Lower Income RHNA Target (adjusts each agencies unit number up 1.61% to meet RHND target number) | Final Adjusted High RHNA Target (agency total units minus Final Lower Income RHNA Target) |
| Arcata                | 545               | 164                               | 16%                  | 189   | 382                       | 2%           | 388   | 577  | 586   | 456   |
| Blue Lake             | 21                | 6                                 | 52%                  | 10  | 15                        | -19%         | 12  | 22   | 22  | 19  |
| Eureka                | 910               | 273                               | -39%                 | 165   | 637                       | 23%          | 786   | 951  | 967   | 773   |
| Ferndale              | 30                | 9                                 | 2%                   | 9   | 21                        | 11%          | 23  | 33   | 33  | 24  |
| Fortuna               | 251               | 75                                | -15%                 | 64  | 176                       | 15%          | 203   | 267  | 271   | 208   |
| Rio Dell              | 50                | 15                                | -49%                 | 8   | 35                        | -8%          | 32  | 40   | 40  | 55  |
| Trinidad              | 14                | 4                                 | 53%                  | 6   | 10                        | -19%         | 8   | 14   | 15  | 12  |
| Unincorporated County | 1298              | 389                               | -19%                 | 316   | 909                       | -6%          | 850   | 1166   | 1185  | 1296  |
| <b>Totals</b>         | <b>3,119</b>      | <b>-</b>                          | <b>-</b>             | <b>-</b>  | <b>-</b>                  | <b>-</b>     | <b>-</b>  | <b>3,070</b>   | <b>3,119</b>  | <b>2,843</b>  |

**Summary of unit allocations per income category per agency.**

| <b>Summary - 50/50 Jobs/Population - Low Income RHNA per VMT and Opportunity</b> |                            |                               |                          |                     |                           |                             |                                 |                       |                        |
|--|----------------------------|-------------------------------|--------------------------|---------------------|---------------------------|-----------------------------|---------------------------------|-----------------------|------------------------|
| Jurisdiction   | Acutley Low (0% - 15% MHI) | Extremely Low (15% - 30% MHI) | Very Low (30% - 50% MHI) | Low (50% - 80% MHI) | Moderate (80% - 120% MHI) | Above Moderate (120% < MHI) | Total Jurisdictional Allocation | Total Low Income RHNA | Total High Income RHNA |
| Arcata   | 103                        | 160                           | 117                      | 206                 | 89                        | 367                         | 1,042                           | 586                   | 456                    |
| Blue Lake  | 3                          | 7                             | 4                        | 8                   | 4                         | 15                          | 41                              | 22                    | 19                     |
| Eureka   | 179                        | 267                           | 193                      | 328                 | 154                       | 619                         | 1,740                           | 967                   | 773                    |
| Ferndale   | 6                          | 9                             | 7                        | 11                  | 5                         | 19                          | 57                              | 33                    | 24                     |
| Fortuna  | 50                         | 75                            | 53                       | 93                  | 44                        | 164                         | 479                             | 271                   | 208                    |
| Rio Dell   | 7                          | 11                            | 6                        | 16                  | 10                        | 45                          | 95                              | 40                    | 55                     |
| Trinidad   | 3                          | 4                             | 3                        | 5                   | 6                         | 6                           | 27                              | 15                    | 12                     |
| Unincorporated County  | 211                        | 333                           | 244                      | 397                 | 253                       | 1,043                       | 2,481                           | 1,185                 | 1,296                  |
| <b>Total Regional Allocation</b>   | <b>562</b>                 | <b>866</b>                    | <b>627</b>               | <b>1,064</b>        | <b>565</b>                | <b>2,278</b>                | <b>5,962</b>                    | <b>3,119</b>          | <b>2,843</b>           |

## **RHNA Appeal Process**

On January 15<sup>th</sup>, 2026 HCAOG received a written appeal from the City of Eureka. A full copy of the appeal is attached. Staff presented the appeal at a formally noticed appeal hearing, held on March 19<sup>th</sup> 2026.

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. No additional comments were received prior to the public hearing.

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 were no longer seeking 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. On April 30<sup>th</sup>, 2026, the Board approved a final written determination denying the appeal by the City of Eureka, which is included as an attachment.

## **Appendix A**

**Final Determination Letter from the State of California Department of Housing and  
Community Development**

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

2020 W. El Camino Avenue, Suite 500  
Sacramento, CA 95833  
(916) 263-2911 / FAX (916) 263-7453

[www.hcd.ca.gov](http://www.hcd.ca.gov)



July 15, 2025

Brendan Byrd, PE  
Executive Director  
Humboldt County Association of Governments  
611 I Street, Suite B  
Eureka, CA 95501

Dear Brendan Byrd:

**RE: Final Regional Housing Need Determination**

This letter provides Humboldt County Association of Governments (HCAOG) its final Regional Housing Need Determination. Pursuant to state housing element law (Government Code section 65584, et seq.), the Department of Housing and Community Development (HCD) is required to provide the determination of the region's existing and projected housing need.

In assessing HCAOG's regional housing need, HCD and HCAOG staff completed a consultation process from May 2025 through July 2025 covering the methodology, data sources, and timeline for HCD's determination of the Regional Housing Need. To inform this process, HCD also consulted Walter Schwarm and Jim Miller of the California Department of Finance (DOF) Demographic Research Unit.

Attachment 1 displays the minimum regional housing need determination of **5,962** total units among six income categories for HCAOG to distribute among the region's local governments. Attachment 2 explains the methodology applied pursuant to Gov. Code section 65584.01. In determining the region's housing need, HCD considered all the information specified in state housing law (Gov. Code section 65584.01(c)).

HCAOG is responsible for adopting a methodology for RHNA allocation and RHNA Plan for the *projection* period beginning June 30, 2027 and ending July 15, 2035. Pursuant to Gov. Code section 65584(d), the methodology to prepare HCAOG's RHNA plan must further the following objectives:

- (1) Increasing the housing supply and mix of housing types, tenure, and affordability
- (2) Promoting infill development and socioeconomic equity, protecting environmental and agricultural resources, and encouraging efficient development patterns
- (3) Promoting an improved intraregional relationship between jobs and housing

- (4) Balancing disproportionate household income distributions
- (5) Affirmatively furthering fair housing

Pursuant to Government Code section 65584.04(e), to the extent data is available, HCAOG shall consider including the factors listed in Government Code section 65584.04(e)(1-13) to develop its RHNA plan. Also, pursuant to Government Code section 65584.04(f), HCAOG must explain in writing how each of these factors was incorporated into the RHNA plan methodology and how the methodology furthers the statutory objectives described above.

Gov. Code section 65588(e)(6) specifies the RHNA *projection* period begins December 31 or June 30, whichever date most closely preceded the previous projection period end date. The RHNA projection period end date is set to align with the planning period end date. HCAOG's local governments are responsible for updating their housing elements for the *planning* period beginning July 15, 2027 and ending July 15, 2035 to accommodate their share of new housing need for each income category. Please note, a jurisdiction authorized to permit residential development may take RHNA credit for new units approved, permitted, and/or built since the start date of the RHNA *projection* period (June 30, 2027).

As specified in Gov. Code section 65584.01(c), a COG may, within 30 days from the date of this letter, file an objection to HCD's determination of the region's existing and projected housing need.

HCD encourages all HCAOG's local governments to consider the many affordable housing and community development resources available to local governments. HCD's programs can be found at <https://www.hcd.ca.gov/grants-funding/nofas.shtml>.

HCD commends HCAOG's leadership in fulfilling their important role in advancing the state's housing, transportation, and environmental goals. HCD looks forward to continued partnership with the region and in assisting in planning efforts to accommodate the region's share of housing need.

If HCD can provide any additional assistance, or if you, or your staff, have any questions, please contact Thomas Nguyen, Senior Data Specialist, at [thomas.nguyen@hcd.ca.gov](mailto:thomas.nguyen@hcd.ca.gov), Taylor Price, Specialist, at [taylor.price@hcd.ca.gov](mailto:taylor.price@hcd.ca.gov), or Kevan Rolfness, Data Specialist, at [kevan.rolfness@hcd.ca.gov](mailto:kevan.rolfness@hcd.ca.gov).

Sincerely,



Marisa Prasse  
Fair Housing Section Chief

## ATTACHMENT 1

### HCD REGIONAL HOUSING NEED DETERMINATION Humboldt County Association of Governments (HCAOG): June 30, 2027 through July 15, 2027

| <u>Income Category</u> | <u>Percent</u> | <u>Housing Unit Need</u> |
|------------------------|----------------|--------------------------|
| Acutely Low            | 9.4%           | 562                      |
| Extremely Low          | 14.5%          | 866                      |
| Very-Low               | 10.5%          | 627                      |
| Low                    | 17.8%          | 1,064                    |
| Moderate               | 9.5%           | 565                      |
| Above-Moderate         | 38.2%          | 2,278                    |
| <b>Total</b>           | <b>100.0%</b>  | <b>5,962</b>             |

*Notes:*

*Income Distribution:*

*Income categories are prescribed by California Health and Safety Code (Section 50063.5, et. seq.). Percentages are derived based on Census/ACS reported household income brackets and county median income as determined by HCD.*

## ATTACHMENT 2

### HCD REGIONAL HOUSING NEED DETERMINATION: Humboldt County Association of Governments (HCAOG): June 30, 2027 through July 15, 2027

#### Methodology

| <b>Humboldt County Association of Governments (HCAOG):<br/>June 30, 2027 – July 15, 2035 (8 years)<br/>HCD Determined Population, Households, &amp; Housing Unit Need</b> |  |               |
|---|--|---------------|
| Reference No.   | Steps Taken to Calculate Regional Housing Need   | Amount        |
| 1.  | <b>Population: June 30, 2035 (DOF June 30, 2035 projection adjusted + 0.5 months to July 15, 2035)</b>                     | 131,962       |
| 2.  | - <i>Group Quarters Population: June 30, 2035 (DOF June 30, 2035 projection adjusted + 0.5 months to July 15, 2035)</i>    | -4,813        |
| 3.  | <b>Household (HH) Population</b>   | 127,149       |
| 4.  | <b>Projected Households</b>  | <b>58,396</b> |
| 5.  | + Owner Vacancy Adjustment (0.99%)   | +324          |
|   | + Renter Vacancy Adjustment (3.55%)  | +907          |
| 6.  | + Overcrowding Adjustment  | +349          |
| 7.  | + Cost-burden Adjustment   | +3,639        |
| 8.  | - Cost-burdened and Overcrowded Households (DOF data)  | -349          |
| 9.  | + Replacement Adjustment Demolitions (.10%)  | +58           |
| 10.   | + Replacement Adjustment Seasonal, Recreational, and Occasional Use (2015 vs. 2023) (0.0%)                                 | +0            |
| 11.   | + Jobs Housing Relationship Adjustment   | +0            |
| 12.   | + Homelessness Adjustment  | +769          |
| 13.   | + State of Emergency Adjustment  | +0            |
| 14.   | - <i>Occupied Units (HHs) estimated projected June 30, 2027 (from DOF data)</i>  | -58,131       |
| 15.   | <b>Preliminary Regional Housing Need (Not including Replacement Adjustment Seasonal, Recreational, and Occasional Use)</b> | <b>5,962</b>  |
| 16.   | + Feasible Jobs/Housing Balance Adjustment   | +0            |
| <b>Total</b>  | <b>7<sup>th</sup> Cycle Regional Housing Need Assessment (RHNA)</b>  | <b>5,962</b>  |

Detailed background data for this chart is available upon request.

## **Explanation and Data Sources**

- 1-4. Population, Group Quarters, Household Population, & Projected Households: Pursuant to Government Code Section 65584.01, projections were extrapolated from Department of Finance (DOF) projections. Population reflects total persons. Group Quarter Population reflects persons in a dormitory, group home, institution, military, etc. that do not require residential housing. Household Population reflects persons requiring residential housing. Projected Households reflect the propensity of persons, by age-groups, to form households at different rates based on Census trends.
5. Vacancy Adjustment: HCD applies a vacancy adjustment based on the County's current vacancy percentage to promote healthy market vacancies that facilitate housing availability and resident mobility. Healthy vacancy rates are 2% owner and 6% renter for non-MPO regions (7% renter for MPO regions). Adjustment is difference between standard 2% and 6% vacancy rates and region's current vacancy rates based on the 2019-2023 5-year American Community Survey (ACS) data. That difference is then multiplied by the number of projected households by tenure (projected households multiplied by current rates of renter and owner). For Humboldt County, the owner vacancy rate is below the healthy standard, resulting in a 0.99% adjustment. The renter vacancy rate is also below the healthy standard, resulting in a 3.55% adjustment.
6. Overcrowding Adjustment: Pursuant to Government Code 65584.01(b)(1)(C), HCD uses ACS data to consider the percentage of households that are overcrowded in the region compared to the United States national average of households that are overcrowded. In regions where the overcrowding rate is higher than the national average overcrowding rate (3.40%), HCD applies an adjustment based on the number of housing units the region would need to add to meet the national rate. The overcrowding rate for Humboldt County (4.06%) exceeded the national rate. Data is from the 2019-2023 5-year ACS.
7. Cost Burden Adjustment: Pursuant to Government Code 65584.01(b)(1)(H), HCD uses ACS data to consider the percentage of households that are cost burdened in the region compared to the United States national average of households that are cost burdened. In regions where the cost burdened rate is higher than the U.S. national average rate (31.68%), HCD applies an adjustment based on the number of housing units the region would need to add to meet the national rate. The cost burdened rate for Humboldt County (42.15%) exceeded the national rate. HCD estimates that Humboldt County would need to add 3,639 housing units to its existing 54,878 occupied units. These additional units and corresponding reduction in cost burdened households would change the cost burdened rate for Humboldt County to 31.68%. Data is from the 2019-2023 5-year ACS.
8. Overcrowding and Cost Burden Adjustment: To minimize double counting the housing needs of households that are both overcrowded and cost burdened, HCD has implemented an additional overcrowding and cost burden adjustment. For regions with an adjustment for both overcrowding and cost burden, a downward adjustment is applied based on the number of households that are estimated to be both overcrowded and cost burdened according to an analysis of 2023 ACS Public Use Microdata Sample File data (PUMS) provided by DOF. If the DOF data for this adjustment exceeds the

individual adjustments for overcrowding or cost burden, then this adjustment is limited to the lesser of the two. This overcrowding and cost burden adjustment resulted in a 349-unit reduction.

9. Replacement Adjustment: HCD applies a replacement adjustment between .1% to 5% to the total housing stock based on the current 10-year average % of demolitions in the region's local government annual reports to Department of Finance. Units lost during a state of emergency declaration are not included. For Humboldt County, the 10-year average was 0.02% so the minimum adjustment of .1% is applied to the projected occupied households.
10. Replacement Adjustment (Seasonal, Recreational, and Occasional Use Housing Units): In addition to the demolition replacement adjustment, HCD also applies a replacement adjustment to account for housing units that are not available for permanent year-round occupancy. This adjustment is calculated based on the change in the percentage of housing units that are for seasonal, recreational, and occasional use per ACS data. There are two methodologies utilized to calculate this adjustment, depending on changes in the housing stock over the period of analysis. If both the total number of seasonal, recreational, and occasional use housing units and the overall housing stock increased over the relevant 8-year period, HCD calculates the adjustment based on the proportion of newly added housing units used for seasonal, recreational, or occasional purposes during that time frame. This proportion is then applied as a percentage increase to the preliminary housing need assessment. If, however, either the total number of seasonal, recreational, and occasional use housing units or the overall housing stock decreased, HCD instead compares the change in the share of seasonal, recreational, occasional use housing units to total housing units. For Humboldt County, the percentage of seasonal, recreational, occasional use housing units decreased while total housing units increased from 2015 to 2023, therefore HCD applied the methodology based on the change in the percentage share of seasonal, recreational, occasional use units. In 2015, the seasonal, recreational, and occasional use housing units made up 6.4% of total housing units. In 2023, that share of seasonal, recreational, occasional use housing units decreased to 5.00% of total housing units. Therefore, there was no adjustment for Humboldt County for Seasonal, Recreational, and Occasional Use Housing Units. Data is 2015 and 2023 ACS 5-year estimates.
11. Jobs Housing Relationship Adjustment: HCD applies an adjustment based on the number of in-commuters to a region. The adjustment is calculated by dividing the number of in-commuters to the region by HCD's jobs/housing standard of 1.5. This adjustment does not include commuters entering from or leaving to states other than California. In Humboldt County, the number of employed residents exceeded the number of people employed in the county, resulting in no adjustment. Data is from the US Census Bureau LEHD Origin-Destination Employment Statistics, 2022 and 2019-2023 5-year ACS.
12. Homelessness Adjustment: HCD applies an adjustment based on the housing needs of individuals and families experiencing homelessness. An adjustment of 769 units was applied to Humboldt County using data from the Humboldt Housing & Homelessness Coalition 2024 Point-in-Time Count and DOF household formation rates.
13. State of Emergency Adjustment: HCD used data provided by the California

Governor's Office of Emergency Services (CalOES) pursuant to Government Code 65584.01(b)(1)(I) to adjust for units lost due to a declared state of emergency during the previous Planning Period (since 2019). Data is from 2025. To estimate the percentage of units lost that were originally occupied, HCD uses 2019-2023 ACS data to calculate the percentage of units in the region that are temporarily occupied by persons with a usual residence elsewhere. HCD then multiplies the occupancy rate by the units lost due to a state of emergency, resulting in a 0-unit adjustment.

14. Occupied Units: Reflects DOF's projected occupied units at the start of the projection period (June 30, 2027).
15. Preliminary Regional Housing Need Determination: Housing need calculated after applying factors described in Government Code 65584.01(b). This preliminary Regional Housing Need Determination is used to evaluate feasible balance between jobs and housing and the Replacement Adjustment (Seasonal, Recreational, and Occasional Use).
16. Feasible Jobs/Housing Balance Adjustment: According to statute, the "region's existing and projected housing need shall reflect the achievement of a feasible balance between jobs and housing within the region using the regional employment projections in the applicable regional transportation plan" (Gov. Code Section 65584.01(c)(1)). After applying the adjustments noted above, HCD compared the 7th cycle RHNA determination and the region's total occupied housing units to the Caltrans employment projections for Humboldt County to determine whether a feasible balance was achieved. This analysis resulted in a jobs housing balance of .84 (1.19 housing units for every projected job). Because this is below the healthy rate of 1.5, no additional adjustment is needed. Data is from the 2019-2023 5-Year ACS.

# **Appendix B**

## **Summary of Alternative RHNA Methodologies Considered**

**Updated Alternative 1: Total number of units calculated by including opportunity score weighted at 10%.**

**Jobs / Population Model**

| Weighting Factor |      |
|------------------|------|
| Jobs             | 50%  |
| Population       | 40%  |
| Opportunity      | 10%  |
| Total RHNA       | 5962 |

| Based on 2025 DOF Population & 2022 LEHD LODES Work Area Data |                      |                           |                        |   |                          |                   |                         | Alternative 1              |               |
|---|----------------------|---------------------------|------------------------|---|--------------------------|-------------------|-------------------------|----------------------------|---------------|
| Entity  | 2022 Employment Data | DOF Population (1/1/2025) | 2025 Opportunity Score | 2025 Opportunity Score (normalized to high income population) | Opportunity Distribution | Jobs Distribution | Population Distribution | Jobs-Pop Allocation- Opp % | Jobs-Pop RHNA |
| Arcata  | 9,839                | 19,001                    | 6.8                    | 0.81  | 17%                      | 20.7%             | 14.2%                   | 17.7%                      | 1,058.0       |
| Blue Lake   | 252                  | 1,136                     | 9.0                    | 0.08  | 2%                       | 0.5%              | 0.8%                    | 0.8%                       | 46.0          |
| Eureka  | 18,424               | 26,122                    | 3.6                    | 0.71  | 15%                      | 38.8%             | 19.5%                   | 28.7%                      | 1,710.0       |
| Ferndale  | 427                  | 1,361                     | 6.0                    | 0.07  | 1%                       | 0.9%              | 1.0%                    | 1.0%                       | 58.0          |
| Fortuna   | 3,300                | 12,198                    | 5.0                    | 0.45  | 9%                       | 7.0%              | 9.1%                    | 8.0%                       | 480.0         |
| Rio Dell  | 359                  | 3,232                     | 3.0                    | 0.06  | 1%                       | 0.8%              | 2.4%                    | 1.5%                       | 87.0          |
| Trinidad  | 330                  | 296                       | 9.0                    | 0.05  | 1%                       | 0.7%              | 0.2%                    | 0.5%                       | 32.0          |
| Unincorporated County   | 14,501               | 70,471                    | 4.8                    | 2.63  | 54%                      | 30.6%             | 52.7%                   | 41.8%                      | 2,491.0       |
| <b>Totals</b>   | <b>47,432</b>        | <b>133,817</b>            | <b>47</b>              | <b>5</b>  | <b>100%</b>              | <b>100.0%</b>     | <b>100.0%</b>           | <b>100.0%</b>              | <b>5,962</b>  |

**Updated Alternative 2: Below moderate unit allocations weighting opportunity score at 30%, and VMT at 70%.**

**Factor Weighting**

30%

70%

2%

|                       | A                 | B                                 | C                    | D   | E                         | F            | G   | H  | I   | J   |
|-----------------------|-------------------|-----------------------------------|----------------------|---|---------------------------|--------------|---|--|---|---|
| Agency                | Lower Income RHNA | Opportunity Variance Weight (30%) | Opportunity Variance | Lower Income RHNA Units per Opportunity Variance Adjustment | VMT Variance Weight (70%) | VMT Variance | Lower Income RHNA Units per VMT Variance Adjustment | Total Preliminary Adjusted Low Income RHNA (includes Opportunity + VMT Adjustment) | Final Adjusted Lower Income RHNA Target (adjusts each agencies unit number up 1.61% to meet RHND target number) | Final Adjusted High RHNA Target (agency total units minus Final Lower Income RHNA Target) |
| Arcata                | 545               | 164                               | 16%                  | 189   | 382                       | 2%           | 388   | 577  | 586   | 456   |
| Blue Lake             | 21                | 6                                 | 52%                  | 10  | 15                        | -19%         | 12  | 22   | 22  | 19  |
| Eureka                | 910               | 273                               | -39%                 | 165   | 637                       | 23%          | 786   | 951  | 967   | 773   |
| Ferndale              | 30                | 9                                 | 2%                   | 9   | 21                        | 11%          | 23  | 33   | 33  | 24  |
| Fortuna               | 251               | 75                                | -15%                 | 64  | 176                       | 15%          | 203   | 267  | 271   | 208   |
| Rio Dell              | 50                | 15                                | -49%                 | 8   | 35                        | -8%          | 32  | 40   | 40  | 55  |
| Trinidad              | 14                | 4                                 | 53%                  | 6   | 10                        | -19%         | 8   | 14   | 15  | 12  |
| Unincorporated County | 1298              | 389                               | -19%                 | 316   | 909                       | -6%          | 850   | 1166   | 1185  | 1296  |
| <b>Totals</b>         | 3,119             | -                                 | -                    | -   | -                         | -            | -   | 3,070  | 3,119   | 2,843   |

**Updated Alternative 3: Below moderate unit allocations weighting opportunity score, VMT, and regional income parity at 33.3%.**

**Factor Weighting**

33%

33%

33%

4.89%

|                       | A                 | B   | C                                       | D  | E                                 | F                    | G   | H                         | I            | J   |  |   |   |
|-----------------------|-------------------|---|---|--|-----------------------------------|----------------------|---|---------------------------|--------------|---|--|---|---|
| Agency                | Lower Income RHNA | Regional Housing Income Parity Weight (33%) | Regional Housing Income Parity Variance | Lower Income RHNA Units per Regional Housing Balance Variance Adjustment | Opportunity Variance Weight (33%) | Opportunity Variance | Lower Income RHNA Units per Opportunity Variance Adjustment | VMT Variance Weight (33%) | VMT Variance | Lower Income RHNA Units per VMT Variance Adjustment | Total Preliminary Adjusted Low Income RHNA (includes Opportunity + VMT Adjustment) | Final Adjusted Lower Income RHNA Target (adjusts each agencies unit number up 1.61% to meet RHND target number) | Final Adjusted High RHNA Target (agency total units minus Final Lower Income RHNA Target) |
| Arcata                | 545               | 181   | -12%                                    | 159  | 181                               | 16%                  | 210   | 181                       | 2%           | 184   | 554  | 581   | 461   |
| Blue Lake             | 21                | 7   | -5%                                     | 7  | 7                                 | 52%                  | 11  | 7                         | -19%         | 6   | 23   | 24  | 17  |
| Eureka                | 910               | 303   | 2%                                      | 309  | 303                               | -39%                 | 183   | 303                       | 23%          | 374   | 866  | 909   | 831   |
| Ferndale              | 30                | 10  | -5%                                     | 9  | 10                                | 2%                   | 10  | 10                        | 11%          | 11  | 31   | 32  | 25  |
| Fortuna               | 251               | 84  | 2%                                      | 85   | 84                                | -15%                 | 71  | 84                        | 15%          | 96  | 253  | 265   | 214   |
| Rio Dell              | 50                | 17  | -20%                                    | 13   | 17                                | -49%                 | 8   | 17                        | -8%          | 15  | 37   | 39  | 56  |
| Trinidad              | 14                | 5   | 37%                                     | 6  | 5                                 | 53%                  | 7   | 5                         | -19%         | 4   | 17   | 18  | 9   |
| Unincorporated County | 1298              | 432   | 1%                                      | 438  | 432                               | -19%                 | 351   | 432                       | -6%          | 404   | 1193   | 1251  | 1230  |
| <b>Totals</b>         | 3,119             |   |   |  | -                                 | -                    | -   | -                         | -            | -   | 2,974  | 3,119   | 2,843   |

## Summary of Unit Allocations per Method Alternative

| Agency                | Method    | Acutely Low (0% - 15% MHI) | Extremely Low (15% - 30% MHI) | Very Low (30% - 50% MHI) | Low (50% - 80% MHI) | Moderate (80% - 120% MHI) | Above Moderate (120%<MHI) | Total Jurisdictional Allocation | Total Low Income Unit Allocation |
|-----------------------|-----------|----------------------------|-------------------------------|--------------------------|---------------------|---------------------------|---------------------------|---------------------------------|----------------------------------|
| Arcata                | Original  | 90                         | 135                           | 103                      | 201                 | 100                       | 413                       | 1,042                           | 529                              |
|                       | Updated 1 | 92                         | 137                           | 104                      | 203                 | 103                       | 419                       | 1,058                           | 536                              |
|                       | Updated 2 | 105                        | 163                           | 118                      | 200                 | 91                        | 365                       | 1,042                           | 586                              |
|                       | Updated 3 | 105                        | 161                           | 116                      | 199                 | 92                        | 369                       | 1,042                           | 581                              |
| Blue Lake             | Original  | 3                          | 7                             | 4                        | 7                   | 4                         | 16                        | 41                              | 21                               |
|                       | Updated 1 | 3                          | 8                             | 5                        | 8                   | 4                         | 18                        | 46                              | 24                               |
|                       | Updated 2 | 4                          | 6                             | 4                        | 8                   | 4                         | 15                        | 41                              | 22                               |
|                       | Updated 3 | 4                          | 7                             | 5                        | 8                   | 3                         | 14                        | 41                              | 24                               |
| Eureka                | Original  | 175                        | 258                           | 179                      | 307                 | 171                       | 650                       | 1,740                           | 919                              |
|                       | Updated 1 | 172                        | 254                           | 175                      | 302                 | 168                       | 639                       | 1,710                           | 903                              |
|                       | Updated 2 | 174                        | 269                           | 194                      | 330                 | 154                       | 619                       | 1,740                           | 967                              |
|                       | Updated 3 | 164                        | 252                           | 183                      | 310                 | 165                       | 666                       | 1,740                           | 909                              |
| Ferndale              | Original  | 8                          | 6                             | 6                        | 10                  | 5                         | 22                        | 57                              | 30                               |
|                       | Updated 1 | 8                          | 6                             | 6                        | 10                  | 5                         | 23                        | 58                              | 30                               |
|                       | Updated 2 | 6                          | 9                             | 7                        | 11                  | 4                         | 20                        | 57                              | 33                               |
|                       | Updated 3 | 6                          | 9                             | 6                        | 11                  | 5                         | 20                        | 57                              | 32                               |
| Fortuna               | Original  | 45                         | 70                            | 50                       | 93                  | 46                        | 175                       | 479                             | 258                              |
|                       | Updated 1 | 45                         | 70                            | 50                       | 94                  | 46                        | 175                       | 480                             | 259                              |
|                       | Updated 2 | 50                         | 75                            | 54                       | 92                  | 41                        | 167                       | 479                             | 271                              |
|                       | Updated 3 | 48                         | 74                            | 53                       | 90                  | 43                        | 171                       | 479                             | 265                              |
| Rio Dell              | Original  | 8                          | 14                            | 8                        | 16                  | 10                        | 39                        | 95                              | 46                               |
|                       | Updated 1 | 8                          | 13                            | 7                        | 15                  | 9                         | 35                        | 87                              | 43                               |
|                       | Updated 2 | 7                          | 11                            | 8                        | 14                  | 11                        | 44                        | 95                              | 40                               |
|                       | Updated 3 | 7                          | 11                            | 8                        | 13                  | 11                        | 45                        | 95                              | 39                               |
| Trinidad              | Original  | 4                          | 4                             | 5                        | 7                   | 3                         | 4                         | 27                              | 20                               |
|                       | Updated 1 | 4                          | 5                             | 6                        | 8                   | 3                         | 6                         | 32                              | 23                               |
|                       | Updated 2 | 3                          | 4                             | 3                        | 5                   | 2                         | 10                        | 27                              | 15                               |
|                       | Updated 3 | 3                          | 5                             | 4                        | 6                   | 2                         | 7                         | 27                              | 18                               |
| Unincorporated County | Original  | 229                        | 372                           | 272                      | 423                 | 226                       | 959                       | 2,481                           | 1,296                            |
|                       | Updated 1 | 230                        | 373                           | 274                      | 424                 | 227                       | 963                       | 2,491                           | 1,301                            |
|                       | Updated 2 | 213                        | 329                           | 239                      | 404                 | 258                       | 1,038                     | 2,481                           | 1,185                            |
|                       | Updated 3 | 225                        | 347                           | 252                      | 427                 | 244                       | 986                       | 2,481                           | 1,251                            |

## **Appendix C**

### **Adopted Methodology Appeal and Written Determination**

January 15, 2026

Humboldt County Association of Governments  
Attn: Brendan Byrd, HCAOG Executive Director  
611 I Street, Suite B  
Eureka, CA 95501

**RE: City of Eureka Appeal of Adopted Regional Housing Needs Allocation (RHNA) for the 7th Cycle Pursuant to Government Code 65584.05**

Dear Brendan,

Pursuant to Government Code 65584.05(b), the City of Eureka hereby submits this formal appeal of the Humboldt County Association of Governments' (HCAOG) adopted Regional Housing Needs Allocation (RHNA) methodology and resulting allocation for the 7th Housing Element Cycle. This appeal is submitted pursuant to direction provided by the Eureka City Council at its regular meeting of January 6, 2026, and within the statutory 30-day appeal period.

**Basis and Scope of Appeal**

This appeal is submitted pursuant to Government Code 65584.05(b)(2), on the grounds that the adopted allocation, as applied, does not fully further the intent of the objectives listed in Government Code 65584(d).

The City of Eureka wishes to be clear that this appeal does not challenge the overall number of housing units assigned to the City, Eureka's share of the region's total RHNA, or the absolute number of lower-income units allocated to Eureka. Rather, the appeal is limited to the relative distribution of income categories within Eureka's allocation, the proportion of below-moderate-rate, moderate-rate, and above-moderate-rate units as compared to the regional income distribution, and whether that outcome meaningfully advances the statutory objectives of Government Code 65584(d).

Specifically, the City of Eureka's concern is that the adjustment to the distribution of units by income category produces outcomes that do not substantively further the affirmatively further fair housing (AFFH) objective, and, in practice, may undermine it.

**Summary of Adopted RHNA Methodology**

Under HCAOG's adopted methodology, total RHNA units are first assigned to each jurisdiction based on each jurisdiction's relative share of the region's existing population and existing employment, with population and jobs each weighted at 50 percent. This initial step establishes each jurisdiction's overall unit allocation, including Eureka's total allocation of 1,740 units.

In the second step, those total units are distributed across income categories. As an initial baseline, each jurisdiction's total allocation is multiplied by the Regional Housing Needs Determination (RHND) income-category percentages, such that all jurisdictions begin with income distributions that exactly mirror the regional housing need.

Adjustments are then applied to the below-moderate income portion of each jurisdiction's allocation based on differences from the regional average in mapped housing opportunity scores (weighted at 30 percent) and work-based vehicle miles traveled (VMT; weighted at 70 percent).



January 15, 2026

## City of Eureka Appeal of RHNA Methodology

These adjustments modify the proportion of below-moderate income units relative to the regional baseline.

Once the number of below-moderate income units is finalized, the remaining units, comprising both Moderate (80–120 percent AMI) and Above-Moderate (greater than 120 percent AMI) categories, are calculated as the remainder of the total allocation and apportioned using regional income percentages, with a limited corrective adjustment to avoid extreme divergence.

The City is concerned with the resulting proportional outcomes produced by the Step 2 adjustment to the below-moderate-income allocations.

### Proportional Outcomes Do Not Meaningfully Differentiate Based on Opportunity

Government Code 65584(d)(5) requires RHNA allocations to affirmatively further fair housing by promoting integration and addressing patterns of segregation and disparities in access to opportunity. Substantively furthering AFFH includes directing lower-income housing toward higher-resource areas. Government Code 65584(d)(4) also requires allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the countywide distribution.

Although all jurisdictions begin Step 2 with income distributions identical to the regional need, the subsequent adjustment step results in materially different proportional outcomes. In practice, for the City of Eureka, the weighting assigned to work-based VMT substantially outweighs the opportunity score adjustment. As a result, jurisdictions with substantially higher opportunity scores than Eureka receive similar or lower proportional shares of below-moderate-income RHNA, while Eureka, despite having one of the lowest opportunity scores in the region, receives a comparatively higher share. Using HCAOG's data:

|                       | Below Moderate Income RHNA | Moderate & Above Income RHNA | % of Total RHNA Below Moderate Income | Opportunity Score (Area weighted to agency boundary) |
|-----------------------|----------------------------|------------------------------|---------------------------------------|--|
| Arcata                | 586                        | 456                          | 56%                                   | 6.83   |
| Blue Lake             | 22                         | 19                           | 54%                                   | 8.97   |
| Eureka                | 967                        | 773                          | 56%                                   | 3.57   |
| Ferndale              | 33                         | 24                           | 58%                                   | 6  |
| Fortuna               | 271                        | 208                          | 57%                                   | 5.01   |
| Rio Dell              | 40                         | 55                           | 42%                                   | 3  |
| Trinidad              | 15                         | 12                           | 56%                                   | 9  |
| Unincorporated County | 1185                       | 1296                         | 48%                                   | 4.79   |

Eureka has an area-weighted opportunity score of 3.57, which is 39% below the regional average. Jurisdictions such as Arcata (6.83), Blue Lake (8.97), and Trinidad (9.0) have opportunity scores that are nearly double or more than double Eureka's. Despite these differences, Eureka and several higher-opportunity jurisdictions receive approximately the same percentage of below-moderate-income RHNA (approximately 54–56%).

January 15, 2026

## City of Eureka Appeal of RHNA Methodology

At the same time, the corresponding reduction in Eureka’s allocation of Moderate and Above-Moderate units diminishes the City’s share of housing intended to serve middle- and higher-income households relative to the regional distribution.

This outcome raises concern that the adjustment step, as applied, does not meaningfully differentiate allocations based on access to opportunity and does not promote a balanced income mix consistent with the intent of Government Code 65584(d).

### Prior Drafts and Consideration of Alternatives

This concern is not theoretical. Under earlier draft methodologies considered by HCAOG during the RHNA process, Eureka received a different proportional distribution of income categories than under the adopted methodology. In particular, earlier approaches that did not apply the current opportunity and VMT adjustment framework resulted in a lower proportional share of below-moderate income units and a correspondingly higher share of moderate and above-moderate units for Eureka.

During HCAOG’s deliberations, City of Eureka staff expressed support for alternative approaches intended to more evenly balance the RHNA objectives set forth in Government Code 65584(d). By contrast, the adopted methodology assigns predominant weight to work-based VMT in the below-moderate income adjustment step. While the City recognizes the importance of reducing greenhouse gas emissions and promoting infill development, the resulting proportional outcome reduces the share of Moderate and Above-Moderate units assigned to Eureka while increasing the share of Below-Moderate units relative to the regional income distribution. This shift reduces safeguards against income over-concentration and elevates transportation efficiency considerations over the goal of achieving a balanced and integrated income mix.

### Resulting Income Distribution Relative to Regional Need

Although ACS household income data is not used as an input to the adopted RHNA methodology, the City presents the following information to illustrate how the resulting allocation compares to (1) Eureka’s existing household income distribution, (2) the regional housing need determination by income category, and (3) HCAOG’s adopted allocation to Eureka.

| Income Category | Current % of Eureka Households | % of Overall Regional Housing Need Determination | % of Adopted Eureka RHNA |
|-----------------|--------------------------------|--|--------------------------|
| Acutely Low     | 8.6%                           | 9.4%   | 10.3%                    |
| Extremely Low   | 14.1%                          | 14.5%  | 15.3%                    |
| Very Low        | 11.0%                          | 10.5%  | 11.1%                    |
| Low             | 18.6%                          | 17.8%  | 18.9%                    |
| Moderate        | 9.1%                           | 9.5%   | 8.9%                     |
| Above-Moderate  | 38.6%                          | 38.2%  | 35.6%                    |
|                 | 100%                           |  |                          |

January 15, 2026

City of Eureka Appeal of RHNA Methodology

As shown, Eureka's adopted RHNA departs from the regional income distribution in both directions. The allocation assigns Eureka a higher proportion of below-moderate-rate units than the regional need determination while also assigning a lower proportion of Moderate and Above-Moderate units than the regional distribution. The City does not challenge the absolute number of units in any income category; rather, it is the skewed proportional outcome that is of concern.

This comparison also understates Eureka's existing concentration of acutely-low income populations, as ACS household income estimates are limited to individuals residing in housing units and do not capture unsheltered individuals. As the Humboldt County seat and regional service hub, Eureka serves a disproportionately large share of the county's population experiencing homelessness and already hosts a concentration of supportive and safety-net services. In response, the City undertakes significant work focused on this population, including shelter and transitional housing, rapid rehousing, job training, service navigation, and coordinated mental-health response.

At the same time, ACS 5-year data show that Eureka has one of the lowest shares of acutely-low-income households among county jurisdictions. This underscores the limitations of household-based ACS income data which does not capture unsheltered homelessness or the regional concentration of supportive services.

In this context, further reducing the proportion of Moderate and Above-Moderate housing assigned to Eureka risks reinforcing income imbalance rather than promoting a more integrated and economically diverse housing stock.

**Requested Revision**

For the reasons described above, the City of Eureka respectfully requests that HCAOG revise the adopted RHNA allocation to better align the proportional distribution of income categories with the regional housing need determination and the objectives set forth in Government Code 65584(d). The City is not requesting a change to its total unit allocation or overall share of regional housing need, but rather a rebalancing of income-category proportions so that the allocation more effectively promotes economic diversity, avoids over-concentration by income level, and affirmatively furthers fair housing.

Thank you for your consideration of this appeal. The City appreciates HCAOG's work on the RHNA process and respectfully submits this appeal to ensure the adopted allocation fully advances all statutory objectives.

Sincerely,



Cristin Kenyon  
Development Services Director  
City of Eureka

cc: California Department of Housing and Community Development



**HCAOG**  
*Regional Transportation  
Planning Agency*

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*Members:*

*City of Arcata  
City of Blue Lake  
City of Eureka  
City of Ferndale  
City of Fortuna  
City of Rio Dell  
City of Trinidad  
County of Humboldt*

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 15<sup>th</sup>, 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 18<sup>th</sup>, 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 20<sup>th</sup>, 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 18<sup>th</sup>, 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 12<sup>th</sup>, 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 19<sup>th</sup>, 2025. Notification of Adopted Methodology and Commencement of 30-Day Appeal Period.
2. February 18<sup>th</sup>, 2025. Issuance of Draft RHNA Allocation and Notification of Supplementary 10-day Appeal Period

[On January 15<sup>th</sup>, 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 16<sup>th</sup>, 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 19<sup>th</sup>, 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 19<sup>th</sup>, 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 15<sup>th</sup>, 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).

**Appendix D**  
**Methodology Concurrence Letter from HCD**

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

651 Bannon Street, Ste. 400  
Sacramento, CA 95811  
(916) 263-2911 / FAX (916) 263-7453

[www.hcd.ca.gov](http://www.hcd.ca.gov)



February 12, 2025

Brendan Byrd, PE  
Executive Director  
Humboldt County Association of Governments  
611 I Street, Suite B  
Eureka, CA 95501

Dear Brendan Byrd,

**RE: Review of Draft Regional Housing Need Allocation (RHNA) Methodology**

Thank you for submitting the draft Humboldt County Association of Governments (HCAOG) Seventh Cycle Regional Housing Need Allocation (RHNA) Methodology. Pursuant to Government Code Section 65584.04(i), the California Department of Housing and Community Development (HCD) is required to review draft RHNA methodologies to determine whether a methodology furthers the statutory objectives described in Government Code Section 65584(d).

The draft HCAOG RHNA methodology begins with the total regional determination provided by HCD of 5,962 units. HCAOG uses a two-step methodology, which first assigns a total number of units to each jurisdiction based on weighted factors, and then distributes those units to each jurisdiction by income category.

The first weighted factor HCAOG uses to distribute the RHNA is based on each jurisdiction's estimated 2025 population. HCAOG allocates 50 percent of the regional RHNA using this factor. The second weighted factor is based on the total number of jobs within each jurisdiction, which HCAOG uses to allocate the remaining 50 percent of the regional RHNA<sup>1</sup>. Once the initial jurisdictional allocations have been completed, HCAOG begins step two.

For step two, HCAOG takes the results of the first step and uses two separate methods to allocate the RHNA by income category: one for the lower-income RHNA<sup>2</sup> and one for the higher income RHNA<sup>3</sup>.

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<sup>1</sup> The jobs data is obtained from the United States Census Bureau Longitudinal Employer-Household Dynamics Origin-Destination Employment Statistics for 2022.

<sup>2</sup> Lower Income RHNA includes the following income categories: acutely low, extremely low, very low, and low income.

<sup>3</sup> Higher Income RHNA includes the following income categories: moderate and above moderate income.

To assign the lower-income RHNA, HCAOG calculates the percentage of households in each jurisdiction that fall into the lower-income category and multiplies it by the jurisdiction's total RHNA allocation from step one. This initial allocation is then adjusted in two steps with different weighting:

- 30 percent based on a comparison between the countywide opportunity score<sup>4</sup> and the jurisdictional opportunity score.
- 70 percent based on a comparison between the countywide average work-based VMT and the jurisdictional work-based VMT<sup>5</sup>.

The method for allocating higher-income units subtracts the lower-income RHNA (as determined above) from the jurisdiction's total RHNA allocation to arrive at the higher-income RHNA.

The final step in the HCAOG methodology is to assign each jurisdiction's total lower- and higher- income RHNA to individual income categories. HCAOG allocates the RHNA by income category by comparing the percentage of a jurisdiction's population in each income category to the regional average in that income category. Based on this comparison, HCAOG adjusts a jurisdiction's RHNA according to how much it is above or below the regional average, ensuring that the total regional allocation by income category is met. This adjustment may result in minor increases or decreases in a jurisdiction's RHNA for each income category.

**HCD has completed its review of the methodology and finds that the draft HCAOG RHNA Methodology furthers the statutory objectives described in Government Code section 65584(d).**<sup>6</sup> HCAOG's draft methodology directs more RHNA units – particularly lower income units – to jurisdictions with incomes above 80 percent of the region's median, to jurisdictions with more single family homes, to jurisdictions with higher home values and rental costs, and to jobs-rich jurisdictions with greater access to jobs via transit and lower average vehicle miles traveled (VMT).

Below is a brief summary of findings related to each statutory objective described within Government Code Section 65584(d):

*1. Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low- and very low income households. The regional housing needs allocation plan shall allocate units for extremely low and acutely low income households in a manner that is roughly proportional to, and within a range of 3 percent of, the housing*

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<sup>4</sup> Opportunity score is obtained from the TCAC/HCD Opportunity Maps, specifically the COG Geography version, which can be accessed here: [COG Geography TCAC/HCD Opportunity Map - Composite Score \(2025\) - Overview](#)

<sup>5</sup> Work based VMT data was obtained from Fehr and Peer VMT Index Mapping Tool.

<sup>6</sup> While HCD finds this methodology furthers statutory objectives, applying this methodology to another region or cycle may not necessarily further the statutory objectives as housing conditions and circumstances may differ.

*need for very low income households.*

On a per-household basis, the draft methodology allocates slightly more lower-income units to jurisdictions with fewer lower-income households. Higher-income jurisdictions receive a greater proportion of the lower-income RHNA. Jurisdictions with a higher percentage of single-family homes and a greater share of owner-occupied households receive proportionally more lower-income RHNA. Additionally, jurisdictions with higher gross median rents receive a larger share of the regional RHNA allocation. Finally, the regional housing needs allocation plan allocates units for extremely low- and acutely low-income households in a manner that is roughly proportional to the housing need for very low-income households.

*2. Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.*

The draft methodology promotes infill development and efficient development patterns by ensuring that jurisdictions with lower VMT receive a larger share of the regional RHNA allocation. On a per-households basis, the draft methodology allocates more of the regional RHNA to jurisdictions with the largest number of jobs accessible within a 60-minute commute via transit and automobile.

*3. Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.*

On average, jurisdictions within Humboldt County have a jobs-to-housing ratio of between 0.18 and 1.56, where a ratio of one means there is one job per household. The draft methodology generally allocates more RHNA to jurisdictions with a higher share of the regional jobs. It assigns a significantly larger proportion of the regional RHNA to jurisdictions with the highest jobs-to-housing ratios, ensuring that more housing units are directed to areas with the greatest employment opportunities. Furthermore, nearly 60 percent of jobs within Humboldt County are concentrated within two jurisdictions, Arcata and Eureka. Accordingly, the draft methodology allocates a higher share of the regional RHNA to these jurisdictions, thereby improving the intraregional relationship between jobs and housing. Finally, the draft methodology allocates more of the lower income RHNA on a per-household basis to jurisdictions with a greater share of jobs earning less than \$3,333 per month (a proxy for lower-income households).

*4. Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the countywide distribution of households in that category from the most recent American Community Survey.*

On average, jurisdictions with a larger existing share of higher-income

households<sup>7</sup> receive a higher allocation of lower-income RHNA in HCAOG's draft allocation methodology. In the Humboldt draft allocation methodology, jurisdictions with more higher-income households receive more lower-income RHNA. This is true for jurisdictions with a higher percentage of their households earning more than 80 percent of the area median income and more than 120 percent of the area median income. This approach helps ensure jurisdictions with concentrations of higher-income households receive more of the lower-income RHNA.

*5. Affirmatively furthering fair housing, which means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.*

Affirmatively furthering fair housing requires that the draft methodology improve access to opportunity within the region. In HCAOG's draft methodology, jurisdictions with greater access to opportunity receive a larger share of the lower-income RHNA. In the context of HCAOG's draft methodology, jurisdictions with a higher percentage of their population in high or highest opportunity areas, as indicated in the 2025 COG Geography TCAC/HCD Opportunity Map<sup>8</sup>, receive a greater share of both the total and lower-income regional RHNA. This approach helps ensure that the lower-income RHNA is generally allocated to jurisdictions with the most opportunity.

Finally, HCD notes that while HCAOG's draft methodology satisfies the five objectives, regional context remains important when evaluating compliance, and what has worked for HCAOG may not work for other regions.

Finally, pursuant to Government Code section 65584.04(h), HCAOG confirmed via email on December 29, 2026, that the public comment period had closed prior to the submittal of the draft methodology to HCD.

HCD appreciates the active role of HCAOG staff in providing data and input throughout the draft HCAOG RHNA methodology development and review period. HCD especially thanks Brendan Byrd for his significant efforts and assistance.

HCD looks forward to continuing our partnership with HCAOG to help its member jurisdictions meet and exceed the planning and production of the region's housing need.

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<sup>7</sup> Higher income households are defined as having incomes greater than 80 percent of the area median income.

<sup>8</sup> Opportunity score is obtained from the TCAC/HCD Opportunity Maps, specifically the COG Geography version, which can be accessed here: [COG Geography TCAC/HCD Opportunity Map - Composite Score \(2025\) - Overview](#)

In the coming months, HCD, in collaboration with HCAOG members, will prepare and carry out a technical assistance plan geared to support local governments in preparing the 7<sup>th</sup> cycle of the housing elements. Further, support opportunities available for the HCAOG region this cycle include, but are not limited to:

- Prohousing Designation Program – Ongoing awards distributed over-the-counter to local jurisdictions with compliant Housing Elements and prohousing policies. Those awarded receive additional points on application processing preference when applying to housing and non-housing funding programs including the Affordable Housing & Sustainable Communities (AHSC), Infill Infrastructure Grant (IIG), and Transformative Climate Communities (TCC). HCD's Prohousing Designation Program can be found at <https://www.hcd.ca.gov/planning-and-research/prohousing>.
- HCD also encourages all Humboldt County local governments to consider the many other affordable housing and community development resources available to local governments, such as the Permanent Local Housing Allocation program. HCD's programs can be found at <https://www.hcd.ca.gov/funding/nofa-calendar>.

If HCD can provide any additional assistance, or if you, or your staff, have any questions, please contact Taylor Price, Specialist, at [taylor.price@hcd.ca.gov](mailto:taylor.price@hcd.ca.gov) or Balaji Balaganesan, Senior Specialist at [Balaji.balaganesan@hcd.ca.gov](mailto:Balaji.balaganesan@hcd.ca.gov).

Sincerely,

Marisa Prasse



Fair Housing Section Chief