

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).



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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%).

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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%		

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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