



Brendan Byrd <brendan.byrd@hcaog.net>

RE: HCAOG RHNA Schedule

1 message

Price, Taylor@HCD <Taylor.Price@hcd.ca.gov>

Fri, Nov 14, 2025 at 8:45 AM

To: Brendan Byrd <brendan.byrd@hcaog.net>

Cc: "Prasse, Marisa@HCD" <Marisa.Prasse@hcd.ca.gov>, "Rolfness, Kevan@HCD" <Kevan.Rolfness@hcd.ca.gov>, "Balaganesan, Balaji@HCD" <Balaji.Balaganesan@hcd.ca.gov>, "Nguyen, Thomas@HCD" <Thomas.Nguyen@hcd.ca.gov>

Hello Brendan,

HCD appreciates the opportunity to conduct an initial informal review of HCAOG's draft allocation methodology. This review is being undertaken informally; therefore, any items raised in this email do not constitute HCD's formal review, which will be conducted pursuant to the requirements of Government Code section 65584.04(i). HCD understands that there have been many statutory changes to the allocation methodology process since HCAOG's 6th cycle, including the addition of a new Regional Housing Needs Allocation (RHNA) objective to affirmatively further fair housing (AFFH).

HCD understands that the draft HCAOG allocation methodology begins with HCD's regional determination of 5,962 units, which are then distributed using a weighted formula: 50% based on population and 50% on job distribution, according to each jurisdiction's share of the county's total population and jobs. Lastly, to distribute each jurisdiction's RHNA across six income categories, HCAOG allocates the units to each jurisdiction, making an adjustment of 20% to account for variations among jurisdictions in income categories.

As HCAOG is aware, the draft allocation methodology shall further the five statutory objectives of RHNA outlined in Government Code section 65584(d). While HCAOG's methodology incorporates factors and weights that support several of these objectives, the absence of any specific factor, weighting, or consideration within the methodology to advance the AFFH objective raises some flags for potential concern. Draft allocation methodologies are not required to include any specific factors or weighting, but the end result of the allocation methodology must be to meaningfully further all five statutory objectives, including AFFH.

During our past meetings, HCD staff noted that incorporating an additional factor in some fashion such as, but not limited to opportunity map data, could strengthen the draft allocation methodologies alignment with AFFH. Including such a factor would likely result in a greater share of the RHNA allocation being directed to jurisdictions like Arcata, while reducing allocations to jurisdictions such as Eureka and the unincorporated County. This adjustment could also support the jobs-housing objective and ensure the draft allocation methodology supports all five RHNA objectives.

Included in the email are three draft methodology submissions from the 6th cycle, which will serve as useful reference guides for how other jurisdictions allocation methodologies included a weight for affirmatively furthering fair housing. HCD hopes that these examples will assist HCAOG's work in accordance with State Laws towards the development of HCAOG's draft methodology for HCD review.

If HCD can provide any additional assistance, or if you or your staff have any questions, please don't hesitate to reach out.

Kind Regards,