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HCAOG Cycle 7 RHNA Allocation Method and Data Sources

Similar to previous cycles of California's Regional Housing Needs Assessment (RHNA) process within Humboldt County, the Humboldt County Association of Governments (HCAOG) is proposing to implement a RHNA allocation methodology focusing on two important and readily available factors, existing population and existing employment. Further discussion on these factors can be found at the end of this section.

Proposed Allocation Method

As noted above, HCAOG is proposing to carry forward a previous allocation methodology that has been used for the region's previous RHNA cycles. This is 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 of the income categories. Each step in the method, in addition to how this method satisfies the RHNA Objectives (which are summarized at the end of this document), is discussed in further detail below.

The first step assigns the total number of units to each jurisdiction based on the jurisdictions percentage or 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:

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

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 the first step in an opportunity to further fair housing goals, ensuring that all existing communities (including high-resource communities), are given regional allocations (**Objective 5**).

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- 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 supply.

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**)

The results of the first step in the allocation method are shown in the table at the end of this document.

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

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from Acutely Low to Above-Moderate). In past Humboldt RHNA cycles, this was accomplished by assigning each jurisdiction a base allocation rate equal to the regional average (in each economic category), adjusted by 10% of the difference between the regional average and a jurisdiction's average in each category. In RHNA Cycle 7, HCAOG is proposing to use the same methodology, but to increase the adjustment factor to 20%. The general method equation used in this first step in the RHNA allocation is shown below:

$$\begin{aligned} & \textit{Total Jurisdictional Assignment of Units in Income Category X} \\ &= \textit{Regional Average of Units in Income Category X} \\ &\pm 20\%(\textit{Regional Average of Units in Income Category} \\ &\quad - \textit{Jurisdictional Average of Units in Income Category}) \end{aligned}$$

Inserting the adjustment factor into the equation above introduces a small amount of variance, making it so that each agency is then assigned a number of **total** units that does not equal the number calculated in step one of the method. To correct this, HCAOG applied small jurisdictional adjustments in order to balance the total RHNA allocation, and the allocations for each agency. To perform these adjustments for each income category, HCAOG staff again focused on adding individual units to agency's with lower or higher than average units in each income category. In maintaining this method for step two, and doubling the adjustment factor, Humboldt's RHNA method:

- Assigns units of all housing types, tenure, and affordability to each jurisdiction (**Objective 1**)
- Allocates a lower portion of housing type to a jurisdiction which already has a higher than average portion of that housing type (or lower than average portion) (**Objective 4**)
- Furthers fair housing goals by further diversifying the housing types in each jurisdiction as noted above, and adds lower income housing types to all jurisdictions (including higher-resourced communities) (**Objective 5**)

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

The proposed RHNA allocation methodology, through consultation with local agencies, shall also consider a number of additional factors as summarized in California Code Section 65584.04(e). These considerations with responses from HCAOG staff is included at the end of this document.

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Table 1. Total housing unit allocations per agency, 50% jobs/50% existing population.

Agency	2022 Employment Data	DOF Population (1/1/2012)	Jobs Distribution	Population Distribution	Jobs-Pop Allocation %	Jobs-Pop RHNA
Arcata	9,839	19,001	20.7%	14.2%	17.5%	1,042
Blue Lake	252	1,136	0.5%	0.8%	0.7%	41
Eureka	18,424	26,122	38.8%	19.5%	29.2%	1,740
Ferndale	427	1,361	0.9%	1.0%	1.0%	57
Fortuna	3,300	12,198	7.0%	9.1%	8.0%	479
Rio Dell	359	3,232	0.8%	2.4%	1.6%	95
Trinidad	330	296	0.7%	0.2%	0.5%	27
Unincorporated County	14,501	70,471	30.6%	52.7%	41.6%	2,481
Totals	47,432	133,817	100.0%	100.0%	100.0%	5,962

Table 2. Total housing unit allocations per income category, per agency, 50% jobs/50% existing population.

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
Arcata	90	135	103	201	100	413	1,042
Blue Lake	3	7	4	7	4	16	41
Eureka	175	258	179	307	171	650	1,740
Ferndale	8	6	6	10	5	22	57
Fortuna	45	70	50	93	46	175	479
Rio Dell	8	14	8	16	10	39	95
Trinidad	4	4	5	7	3	4	27
County	229	372	272	423	226	959	2,481
Total	562	866	627	1,064	565	2,278	5,962

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RHNA Objectives:

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. 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 need for very low-income households.
2. Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, and the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reduction 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.

RHNA Survey Requirements (CC 65584.04):

Through survey and consultation with the local agencies represented through HCAOG, the following summarized how the 13 required factors per code section 65584.04(e) are addressed in the proposed RHNA methodology.

(1) Your 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 siting 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

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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

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

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

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(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 out housing unit infill within existing urbanized areas