

Mendocino Council of Governments  
Regional Housing Needs Allocation  
Cycle 7: 2027 – 2035  
Draft Methodology



# Introduction

---

## Overview

The Regional Housing Needs Allocation (RHNA) is a state-required process that seeks to ensure cities and counties are planning for enough housing to accommodate all economic segments of the community. The process is split into three steps:

1. **Regional Determination:** The State Department of Housing and Community Development (HCD) provides each region with a Regional Determination of housing need, which includes a total number of units split into six income categories. Mendocino Council of Governments (MCOG) received the Final Regional Determination for Cycle 7 (2027 – 2035) on August 15, 2025.
2. **RHNA Methodology:** Council of Governments are responsible for developing a RHNA methodology for allocating the Regional Determination to each jurisdiction in the region. This methodology must further a series of State objectives.
3. **Housing Element Updates:** Each jurisdiction must then adopt a housing element that demonstrates, among other things, how the jurisdiction can accommodate its assigned RHNA number through its zoning. The state reviews each jurisdiction's housing element for compliance.

This document describes the Draft Methodology for Mendocino County’s 2027 – 2035 RHNA Cycle 7. The Final Regional Determination for Mendocino County is 6,456 units and includes adjustments, as required by state law, for vacancy, overcrowding, cost-burden, replacement, homelessness, and units lost during a state of emergency.

## Implications of RHNA for Local Governments

California requires that all governments (cities and counties) adequately plan to meet the housing needs of everyone in the community. The RHNA quantifies the need for housing at all income levels and informs local land use planning in addressing existing and future housing needs resulting from population, employment, and household growth. As such, in addition to the total overall housing need number of 6,456 units, the Final RHNA Determination includes units required to meet housing needs across six income categories which are defined in terms of local area median household income (AMHI). These housing needs by income level are found in Table 1.

Table 1 Final HCD RHNA Determination for MCOG

<b>Income Category</b>	<b>Income Limits of AMHI</b>	<b>Percent</b>	<b>Housing Unit Need</b>
Acutely Low	<15%	8.3%	533
Extremely Low	15% - 30%	13.8%	891
Very Low	30% - 50%	10.5%	677
Low	50% - 80%	17.8%	1,151
Moderate	80% - 120%	10.0%	648
Above Moderate	<120%	39.6%	2,556
<b>Total</b>		<b>100.0%</b>	<b>6,456</b>

## RHNA Objectives

State law requires the Mendocino Council of Governments (MCOG) to show how its methodology advances the five RHNA objectives, as described in Government Code (GC) Section 65584(d), shown below.

**Objective 1.** Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties in 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 from 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.

**Objective 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.

**Objective 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.

**Objective 4.** Allocating a lower proportion of housing need to an income category when a jurisdiction already has a 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.

**Objective 5.** Affirmatively furthering fair housing (AFFH). Per GC Section 65584(e), this 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.

In addition to advancing the five RHNA objectives, GC Section 65584.04(b)(1) requires that MCOG survey its member jurisdictions for information to inform development of the RHNA Methodology. To address this, MCOG formed a RHNA Methodology Committee comprised of community development representatives from the County of Mendocino and the cities of Fort Bragg, Point Arena, Ukiah, and Willits. Multiple committee meetings were held between September and November 2025 where the information regarding the factors listed in GC Section 65584.04(e) was discussed to help guide the development of the methodology.

## Base RHNA Calculation

---

The initial step in the development of the RHNA methodology was to determine each jurisdiction's total base RHNA allocation, broken down by income category. The first step in doing this was to determine the percentage of the county's population within each jurisdiction using the 2025 Department of Finance Population Estimates found in HCD's Regional Housing Need Allocation Workbook. Table 2 below shows the percentage distribution of population between the four incorporated cities and the unincorporated County as a percentage of the total population.

Table 2 Regional Population Distribution

<b>2025 Dept. of Finance Population Estimates</b>		
Jurisdiction	Pop.	% of Pop.
Fort Bragg	7,187	8.00%
Point Arena	452	0.50%
Ukiah	16,325	18.17%
Willits	4,838	5.39%
Unincorporated	61,025	67.94%
<b>Total</b>	<b>89,827</b>	

The percentages found in Table 2 were then multiplied across the units for each income level identified in Table 1 to determine each jurisdiction’s initial total RHNA allocation, broken down by income category. Table 3 below shows each jurisdiction's base allocation of units.

Table 3 Base RHNA Allocation Based on Population Distribution

Categories	HCD Determination	Fort Bragg	Point Arena	Ukiah	Willits	Unincorporated
Acutely Low	533	43	3	97	29	362
Extremely Low	891	71	4	162	48	605
Very Low	677	54	3	123	36	460
Low	1151	92	6	209	62	782
Moderate	648	52	3	118	35	440
Above Moderate	2556	205	13	465	138	1,736
<b>TOTAL</b>	<b>6,456</b>	<b>517</b>	<b>32</b>	<b>1,173</b>	<b>348</b>	<b>4,386</b>

## Allocation Adjustment Factors

The RHNA methodology is designed to advance each of the statutory objectives. Table 4 lists the five RHNA objectives by row and the factors used to further those objectives are listed by column. The first two objectives are intrinsically addressed through the assignment of units for each income category during the base RHNA calculations. The remaining objectives will be addressed through various adjustment factors approved by the Methodology Committee.

Table 4 RHNA Objectives and Allocation Adjustment Factors

<i>RHNA Objectives (rows) / RHNA Adjustment Factors (columns)</i>	Baseline Allocation	Median Income	Over Crowding	Cost Burden	Manual Adjustments
Increasing the housing supply and mix of housing types	Furthers	Furthers	Supports	Supports	
Promoting infill development, socioeconomic equity, and protection of agricultural lands	Supports	Supports	Furthers	Furthers	Furthers
Promoting an improved intraregional relationship between jobs and housing					Furthers
Balancing disproportionate household income distributions		Furthers	Furthers	Furthers	
Affirmatively furthering fair housing					Furthers

## Median Household Income Adjustment

Following the base RHNA calculation, an adjustment factor was added based on the jurisdictions' percentage of Median Household Incomes (MHIs) in each income category compared to regional averages. Multiple jurisdictions were found to have disproportionate shares of units across the income categories. Table 5 shows the income level distribution across the income categories for each city and the unincorporated area of the county compared to the region. Table 6 highlights the difference between the jurisdictions compared to the region.

Table 5 Median Household Income Distribution

	<b>Fort Bragg</b>	<b>Point Arena</b>	<b>Ukiah</b>	<b>Willits</b>	<b>Unincorporated County</b>	<b>County Total</b>
<b>Categories</b>	%	%	%	%	%	%
Acutely Low	6.7%	3.4%	13.2%	11.9%	6.9%	8.3%
Extremely Low	16.8%	15.0%	12.5%	19.5%	13.3%	13.8%
Very Low	15.2%	10.7%	7.2%	7.3%	11.0%	10.5%
Low	21.6%	13.9%	17.6%	21.9%	17.1%	17.8%
Moderate	11.1%	3.2%	10.1%	12.0%	9.8%	10.0%
Above Moderate	28.5%	53.9%	39.5%	27.4%	41.9%	39.6%
<b>TOTAL</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Table 6 Median Household Income Comparison

<b>Categories</b>	<b>Fort Bragg</b>	<b>Point Arena</b>	<b>Ukiah</b>	<b>Willits</b>	<b>Unincorporated</b>
Acutely Low	-1.5%	-4.8%	4.9%	3.7%	-1.3%
Extremely Low	3.0%	1.2%	-1.3%	5.7%	-0.5%
Very Low	4.7%	0.2%	-3.3%	-3.2%	0.5%
Low	3.7%	-4.0%	-0.3%	4.0%	-0.7%
Moderate	1.1%	-6.9%	0.0%	2.0%	-0.2%
Above Moderate	-11.0%	14.3%	-0.1%	-12.2%	2.3%

The resulting percentage adjustments found in Table 6 were added to the base RHNA allocations as a means of balancing the current shares by income category within each jurisdiction. This addresses Objectives 2 and 4 of GC Section 65584(d), which seek an increase to promote socioeconomic equity, and balance disproportionate household income distributions.

## Overcrowding and Cost Burden Adjustments

The Methodology Committee discussed overcrowding and cost burden data for the region provided by HCD in the Regional Housing Need Allocation Workbook. Similar to the regional averages and jurisdictional deviations for the MHI adjustments above, Table 7 shows the “overcrowding” and “cost burden” percentages for each jurisdiction that were identified by HCD and compared to the region as a whole.

Table 7 Additional Adjustment Factors

Categories	Fort Bragg	Point Arena	Ukiah	Willits	Unincorporated
Overcrowding	2.2%	0.4%	-2.2%	7.2%	-0.3%
Cost Burden	10.0%	-0.1%	2.2%	9.6%	-2.8%

The percentages for each jurisdiction found in Table 7 were then multiplied across the corresponding jurisdiction’s MHI percentages for the income categories found in Table 5, allowing for the adjustment factors to be distributed across the six income categories.

Table 8 Overcrowding Adjustment Factors

Categories	Fort Bragg	Point Arena	Ukiah	Willits	Unincorporated
Acutely Low	0.1%	0.0%	-0.3%	0.9%	0.0%
Extremely Low	0.4%	0.1%	-0.3%	1.4%	0.0%
Very Low	0.3%	0.0%	-0.2%	0.5%	0.0%
Low	0.5%	0.1%	-0.4%	1.6%	-0.1%
Moderate	0.2%	0.0%	-0.2%	0.9%	0.0%
Above Moderate	0.6%	0.2%	-0.9%	2.0%	-0.1%

Table 9 Cost Burden Adjustment Factors

Categories	Fort Bragg	Point Arena	Ukiah	Willits	Unincorporated
Acutely Low	0.7%	0.0%	0.3%	1.1%	-0.2%
Extremely Low	1.7%	0.0%	0.3%	1.9%	-0.4%
Very Low	1.5%	0.0%	0.2%	0.7%	-0.3%
Low	2.2%	0.0%	0.4%	2.1%	-0.5%
Moderate	1.1%	0.0%	0.2%	1.2%	-0.3%
Above Moderate	2.9%	-0.1%	0.9%	2.6%	-1.2%

Overcrowding and Cost Burden metrics can both be used as measures of affordability. An increase in the housing supply as well as a healthy mix of housing types can work to alleviate these dual barriers, according to with Objective 1 in GC Section 65584(d), as well as addressing factors discussed under GC Section 65584.04(e)(6) and (7).

## Manual Adjustments

Following discussion of the aforementioned adjustment factors, the Methodology Committee discussed applying manual adjustments to account for the following:

- a. A transfer of 27 units from the County to the City of Ukiah as part of the Western Hills Annexation
- b. The total number of units allocated to any jurisdiction doesn’t exceed 110% of their available land
- c. Targeted adjustments based on the jurisdictions’ Neighborhood Opportunity scores determined by the 2025 AFFH Mapping Tool
- d. The number of units allocated to a jurisdiction for the extremely low- and acutely low income households is within a three percent range of number of very low income households to be compliant with GC Section 65584(d)(1)
- e. The availability of jobs, utilities, and land pursuant to GC Sections 65584.04(e)(1), (2)(A) & (2)(B)
- f. Preservation of agricultural land pursuant to GC Section 65584.04(e)(2)(D)

- g. Wildfire risk pursuant to GC Section 65584.04(e)(2)(E)
- h. Rounding errors resulting from the Base RHNA Allocation and previously discussed adjustment factors

## Consistency with State Housing Law

---

Pursuant to GC Section 65584.04(b), the methodology discussed herein is the product of multiple meetings of the Methodology Committee and incorporates information to demonstrate compliance with State statutes, objectives identified in GC Section 65584(d), and goals with respect to housing policy.

### RHNA Objectives

The methodology includes a base calculation and several adjustment factors designed to support and further the five RHNA objectives previously described. Utilizing data on the median household income (MHI) of existing units to adjust the jurisdictional allocations to bring local housing markets into balance with respect to the six income categories further Objectives 1 and 4. Applying adjustment factors for jurisdictional deviation over or below regional Overcrowding and Cost Burden averages will also be used to help promote socioeconomic equity and parity furthering Objectives 2 and 4. The various manual adjustments that will be made by the Methodology Committee will further Objectives 2, 3, and 5.

### RHNA Factors for Consideration

Government Code Section 65584.04(e) requires that MCOG, to the extent that sufficient data is available from the local jurisdictions, consider 13 factors when developing the allocation methodology for regional housing needs. The following list provides a summary of these considerations based on information received from the region's five jurisdictions:

1. *Relationship between existing and projected jobs and housing affordability.*  
Specific data on local "jobs/housing affordability" for the jurisdictions was not readily available. This was discussed by the Methodology Committee and manual adjustments may be made as appropriate.
2. *Constraints due to the availability of sewer, water, developable land, land preservation policies, and impacts caused by climate change.*  
The data that was available didn't allow for the development of an adjustment formula similar to what was done for cost burden and overcrowding. However, these are factors that the Methodology Committee feel are important in determining the allocation of units and manual adjustments will be made.
3. *Distribution of household growth as a means of maximizing public transportation or existing transportation infrastructure.*  
Infill development is emphasized in policy language found within the current housing elements of the region's jurisdictions and will continue to be a consideration when determining residential zoning objectives within each jurisdiction. However, growth rates overall are expected to remain relatively flat over the next decade, and the existing transportation infrastructure will be able to accommodate housing production scenarios over this span. As such, the Methodology Committee didn't consider this to be a significant factor in determining the allocation of units.

4. *Agreements between jurisdictions directing growth toward incorporated areas and away from areas used for agricultural purposes.*

While no official growth boundary agreements exist between jurisdictions, policies within current housing elements contain language directing growth inward, towards established communities and away from agricultural or rural areas. This was discussed by the Methodology Committee and manual adjustments may be made as appropriate to preserve agricultural lands.

5. *Loss of units contained in assisted housing developments.*

Data was not readily available, and the Methodology Committee did not consider this a significant factor in determining the allocation of housing units.

6. *Housing cost burden at each relevant income level.*

While information was not readily available from the local jurisdictions with respect to housing cost burden, data used by HCD to calculate the initial housing needs of the region found this to be a significant factor in their overall assessment. Relative cost burdens for homeowners and renters were considered by the Methodology Committee, and adjustments will be made to the number of housing units assigned to the five jurisdictions and distributed across the six income categories.

7. *Rate of overcrowding*

Similar to cost burden factors, relative rates of overcrowding were considered by the Methodology Committee, and adjustments will be made to the number of housing units assigned to the five jurisdictions and distributed across the six income categories.

8. *Housing needs of farmworkers.*

Data was not readily available on the housing needs of farmworkers, and the Methodology Committee did not consider this to be a significant factor in determining the allocation of housing units.

9. *Housing needs of college students at private schools, state schools, or universities.*

Mendocino College is largely considered to be a “commuter” school, and the student population is not expected to have a large impact on housing needs within the region. Therefore, the Methodology Committee didn’t consider this to be a significant factor in determining the allocation of units.

10. *Housing needs of individuals and families experiencing homelessness*

Data was not readily available, and the Methodology Committee did not consider this a significant factor in determining the allocation of housing units.

11. *Loss of units during a state emergency during the previous (current) planning period that have yet to be rebuilt.*

Data was not readily available, and the Methodology Committee did not consider this a significant factor in determining the allocation of housing units.

12. *Consideration of the region’s greenhouse gas emission targets.*

Greenhouse gas emissions aren’t expected to reach a level of significance in the Mendocino County given the relatively flat growth rates and smaller existing population numbers. As such, the Methodology Committee didn’t consider this to be a significant factor in determining the allocation of units.

13. *Other factors adopted by MCOG*

No other policy factors have been adopted by MCOG with respect to housing needs allocation.