

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.

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). Additionally, 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. Furthermore, GC Section 65584.04(d) requires that MCOG conduct at least one public hearing to receive oral and written comments on the proposed methodology. MCOG held a public hearing on the first iteration of the draft methodology at the October 2025 Board meeting. Following substantial changes to the draft methodology, an additional public hearing was held at the February 2026 Board meeting. As part of the outreach process, MCOG sent the draft methodology to agencies (Redwood Coast Regional Center, Area Agency on Aging, etc.) that assist vulnerable populations with housing. The draft methodology was also posted on MCOG's website where it was accessible to all interested parties.

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

Income Category	Income Limits of AMHI	Percent	Housing Unit Need
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
Total		100.0%	6,456

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

2025 Dept. of Finance Population Estimates		
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%
Total	89,827	

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
TOTAL	6,456	517	32	1,173	348	4,386

Allocation Adjustment Factors

The RHNA methodology is designed to advance each of the statutory objectives. 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.

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 4 shows the income level distribution across the income categories for each city and the unincorporated area of the county compared to the region. Table 5 highlights the difference between the jurisdictions compared to the region.

Table 4 Median Household Income Distribution

	Fort Bragg	Point Arena	Ukiah	Willits	Unincorporated County	County Total
Categories	%	%	%	%	%	%
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%
TOTAL	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

Table 5 Median Household Income Comparison

Categories	Fort Bragg	Point Arena	Ukiah	Willits	Unincorporated
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 5 were added to the base RHNA allocations as a means of balancing the current shares by income category within each jurisdiction.

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 6 shows the "overcrowding" and "cost burden" percentages for each jurisdiction that were identified by HCD and compared to the region as a whole.

Table 6 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 6 were then multiplied across the corresponding jurisdiction’s MHI percentages for the income categories found in Table 4, allowing for the adjustment factors to be distributed across the six income categories.

Table 7 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 8 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, addressing Objective 1 in GC Section 65584(d), as well as factors discussed under GC Section 65584.04(e)(6) and (7).

The table below shows RHNA allocation after the MHI, overcrowding, and cost burden adjustment factors have been applied.

Table 9 RHNA allocation with MHI, Overcrowding, and Cost Burden Adjustment Factors applied

Categories	HCD Determination	Fort Bragg	Point Arena	Ukiah	Willits	Unincorporated
Acutely Low	533	44	3	92	28	366
Extremely Low	891	71	4	164	47	606
Very Low	677	53	3	127	38	456
Low	1151	91	6	210	62	783
Moderate	648	52	3	118	35	440
Above Moderate	2556	234	11	465	161	1,674
TOTAL	6,456	545	30	1,176	371	4,325

Manual Adjustments

Following discussion of the aforementioned adjustment factors, the Methodology Committee discussed applying manual adjustments to account for: the Western Hills Annexation, targeted adjustments based on the jurisdictions’ Neighborhood Opportunity scores, availability and preservation of land, and to account for rounding errors.

The Western Hills Annexation between the County and City of Ukiah transferred 14 low-income and 13 moderate-income units from the County to the City.

Table 10 RHNA allocation with manual adjustment for Western Hill Annexation

Categories	HCD Determination	Fort Bragg	Point Arena	Ukiah	Willits	Unincorporated
Acutely Low	533	44	3	92	28	366
Extremely Low	891	71	4	164	47	606
Very Low	677	53	3	127	38	456
Low	1,151	91	6	224	62	769
Moderate	648	52	3	131	35	427
Above Moderate	2,556	234	11	465	161	1,674
TOTAL	6,456	545	30	1,203	371	4,298

Measurements of educational, economic, and environmental “opportunities” are provided in the 2025 Opportunity Map (CTAC/HCD), which identifies Census Block Groups with higher or lower resources associated with positive economic, educational, and health outcomes for low-income families, particularly long-term outcomes for children.

The average “Neighborhood Opportunity” scores among the five jurisdictions, as seen in the table below, range from 3.7 to 7.0.

Table 11 Neighborhood Opportunity scores

	Fort Bragg	Point Arena	Ukiah	Willits	Unincorporated County	County Average
Score	5.29	7.00	5.00	3.67	4.76	4.84

The cities of Fort Bragg and Ukiah and the unincorporated county have scores within 10 percent of the county average, while the cities of Point Arena and Willits have scores approximately 44 percent higher and 24 percent lower than the county average, respectively. Based on these scores, the Methodology Committee was comfortable making manual adjustments to accommodate more acutely low, extremely low, very low, and low units in the City of Point Arena relative to the City of Willits, where opportunity resources are more limited, and an adjustment to accommodate more above moderate units to the City of Willits, . This targeted adjustment aligns with and advances the State’s Affirmatively Furthering Fair Housing (AFFH) objectives by directing more lower-income capacity toward higher opportunity neighborhoods, while avoiding unjustified concentration in lower-opportunity areas.

Table 12 RHNA allocation including adjustments for Western Hills Annexation & Neighborhood Opportunity scores

Categories	HCD Determination	Fort Bragg	Point Arena	Ukiah	Willits	Unincorporated
Acutely Low	533	44	5	92	26	366
Extremely Low	891	71	6	164	45	606
Very Low	677	53	5	127	36	456
Low	1,151	91	8	224	60	769
Moderate	648	52	3	131	35	427
Above Moderate	2,556	229	8	465	169	1,674
TOTAL	6,456	540	35	1,203	371	4,298

The final manual adjustment that was applied was to account for rounding errors that arose during the process. Applying the allocation adjustment factors described above led to one additional extremely low unit, one additional low unit, and a deficit of 11 above moderate units. The extremely low unit was deducted from the unincorporated County, and the low unit was subtracted from Ukiah’s total. The additional 11 above moderate units were distributed across four of the jurisdictions, with two each going to Fort Bragg, Ukiah, and the unincorporated County, and five to Willits. The adjustments to account for rounding were made in an effort to balance the above moderate units while trying to adhere to GC Section 65584(d)(1) as best as possible. The table below shows the allocation of units for each jurisdiction after all adjustment factors, both formula and manual, have been applied.

Table 13 RHNA allocation including all adjustment factors

Categories	HCD Determination	Fort Bragg	Point Arena	Ukiah	Willits	Unincorporated
Acutely Low	533	44	5	92	26	366
Extremely Low	891	71	6	164	45	605
Very Low	677	53	5	127	36	456
Low	1,151	91	8	223	60	769
Moderate	648	52	3	131	35	427
Above Moderate	2,556	231	8	467	174	1,676
TOTAL	6,456	542	35	1,204	376	4,299

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

As previously mentioned, state law requires MCOG to show how its methodology advances the five RHNA objectives, as described in GC Section 65584(d). The objectives listed below include a brief discussion of how they have been addressed within the methodology:

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.

As previously discussed, the methodology includes several adjustment factors designed to consider equitable distribution of units for various income specific categories. For instance, data on the median household income (MHI) of existing units will be used to adjust the final allocation in order to bring local housing markets into balance with respect to the six income categories. Additionally, jurisdictional deviation above or below average Overcrowding or Cost Burden factors will also be used to level the playing field.

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.

Equity, efficiency, and environmental considerations were included in developing the methodology by considering “opportunity” scores in the final allocation. Based on the 2025 Opportunity Mapping Tool, the cities of Fort Bragg and Ukiah and the unincorporated County have roughly the same amount of general amenities (e.g., services, educational opportunities, etc.) and have opportunity scores within 10 percent of the County average. However, Point Arena had a significantly higher score, and Willits had a significantly lower score, when compared to the county average. Manual adjustments to the acutely low, extremely low, very low-, and low-income units from Willits to Point Arena will be applied at the end of the process to help with socioeconomic equity. Conversely, Willits is seeking a larger share of above moderate accommodations so that higher skilled, better paid professionals may be able to locate within the city, shortening commute times and reducing vehicle miles traveled or greenhouse gas (GHG) emissions related impacts.

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.

Similar to the discussion under Objective 2 above, the methodology includes efforts to balance jobs and housing within the region. As noted earlier, the jurisdiction with the highest “neighborhood opportunity” score in the 2025 Opportunity Mapping Tool was Point Arena. Their accommodation of higher shares of lower income household units helps to advance this objective. Furthering this objective is the transfer of low-income household units from the County to the City of Ukiah as part of the Western Hills Annexation. This transfer helps improve the balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers within the City of Ukiah.

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.

Based on data from HCD, the median household income levels for existing households in each jurisdiction were analyzed, finding the cities of Fort Bragg and Willits to hold smaller shares of above-moderate units and disproportionately large percentages of acutely low, extremely low, very-low, and low-income units. The methodology supports this objective by aiming to correct the imbalances, where deemed appropriate.

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.

The 2025 Opportunity Mapping Tool discussed within this methodology was used to evaluate “disparities in housing needs and in access to opportunity” for all residents of the region, regardless of race or ethnicity, in an effort to equalize the allocation of income tiered units among the jurisdictions. The intention is to incorporate AFFH concepts into its overall distribution.

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” was not available for the region as a whole or for the individual jurisdictions. This was discussed by the Methodology Committee and they chose to look at other factors in determining the final allocation.

2. Constraints due to the availability of sewer, water, developable land, land preservation policies, and impacts caused by climate change.

Data was not available, nor provided by local community development agencies with respect to constraints based on infrastructure availability or development policy. Given the proposed distribution of units from factors that were used, the Methodology Committee did not feel these to be significant obstacles to overcome in determining the final allocation.

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.

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.