MENDOCINO
COUNCIL OF GOVERNMENTS
525 South Main Street~Ukiah~California~95482
www.mendocinocog.org

NEPHELE BARRETT, EXECUTIVE DIRECTOR

Administration: Suite B
(707) 463-1859
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AGENDA

Monday, August 24, 2026 at 1:30 p.m.

Primary Location:
County Administration Center, Board of Supervisors Chambers
Room 1070, 501 Low Gap Road, Ukiah

Teleconference Locations:
Fort Bragg City Hall, 416 N. Franklin St., Fort Bragg
Willits City Hall, 111 E. Commercial St., Willits
Point Arena City Hall, 451 School St., Point Arena
Caltrans District 1, 1656 Union St., Eureka

General Public Teleconference:
https://us02web.zoom.us/j/82349428142?pwd=ZZNLn25ErEpvrRzLGuxsPCGbTWBza9.1
Audio Call-in Option: 1 (669) 900-6833 (in CA)
Zoom Meeting ID: 823 4942 8142   Passcode:248643

Attachments Posted
Board of Directors - Mendocino Council of Governments (mendocinocog.org)

Additional Media
For live streaming and later viewing:
Mendocino County Video or find
YouTube link at http://www.mendocinocog.org under Meetings

The Mendocino Council of Governments (MCOG) meets as the Board of Directors of:
Mendocino Regional Transportation Planning Agency (RTPA) and
Mendocino County Service Authority for Freeway Emergencies (SAFE)

NOTICE: Mendocino Council of Governments meets in person, in a hybrid format. Staff and a potential quorum meet in the Board of Supervisors chambers in Ukiah. Also, board members join remotely by teleconference (audio and video) from City Hall locations in Fort Bragg, Willits and Point Arena. Policy Advisory Committee member(s) usually join from Caltrans District 1 office in Eureka. The general public may join from any of these posted locations or by calling in to the teleconference.

Several ways to make public comments to MCOG's Board of Directors are available:

- In advance of the meeting: comments may be sent by email to info@mendocinocog.org or by using the form at https://www.mendocinocog.org/contact-us, to be read aloud into the public record. Please submit by 10:00 a.m. on the meeting date to ensure comments are received timely, and include the agenda item number(s) addressed.
- During the meeting: make oral comments in person, or on the conference call by phone or video, when public comment is invited by the Chair.

Thanks to all for your interest and cooperation.

NOTE: ***All items are considered for action unless otherwise noted.***

1. Call to Order and Roll Call
2. Assembly Bill 2449 Notifications and Considerations – *to receive and address requests from Board members to participate in the meeting from a non-posted location, subject to conditions set forth in AB 2449*
3. Regional House Needs Allocation Public Hearing on Appeal of Draft Allocation

SAFE MEETING

4. Convene as SAFE – Service Authority for Freeway Emergencies
   a. Correction to the Adopted FY 2026/27 Mendocino SAFE Budget

5. Recess as SAFE – Convene as RTPA; Recess as RTPA – Reconvene as Policy Advisory Committee

CONSENT CALENDAR

The following items are considered for approval in accordance with Administrative Staff, Committee, and/or Directors' recommendations and will be enacted by a single motion. Items may be removed from the Consent Calendar for separate consideration, upon request by a Director or citizen.

6. Approval of June 1, 2026 Minutes
7. Approval of First Amendment to Fiscal Year 2026/27 Transportation Planning Overall Work Program (OWP)
8. Adoption of Resolution No. M2026-__ Approving the Allocation of FY 2026/27 State of Good Repair Funds to The Ukiah Transit Center Project and the Transfer of FY 2021/22 Funds to a new MTA Safety and Security Repair and Replace Project
9. Approval of Title VI Program & Limited English Proficiency Plan Update

PUBLIC EXPRESSION – *Please refer to notice at top of this Agenda.*

10. Participation is welcome in Council meetings. Comments will be limited to three minutes per person and not more than ten minutes per subject, so that everyone can be heard. "Public Expression" time is limited to matters under the Council's jurisdiction that may not have been considered by the Council previously and are not on the agenda. No action will be taken. Members of the public may comment also during specific agenda items when recognized by the Chair.

REGULAR CALENDAR

11. Technical Advisory Committee Recommendation of August 19, 2026: Allocation of Additional Surface Transportation Block Grant (STBG) Program Funds for The Covelo SR 162 Corridor Multipurpose Trail
12. Technical Advisory Committee Recommendation of August 19, 2026: Approval of Carbon Reduction Program (CRP) Funding: $221,000 for MTA's Purchase of Two Electric Vehicles and $281,391 for City of Fort Bragg's EV Charing Infrastructure Project
13. Presentation: Garcia River Feasibility Study – *Caltrans District 1*

RATIFY ACTION

14. Recess as Policy Advisory Committee – Reconvene as RTPA – Ratify Action of Policy Advisory Committee

REPORTS

15. Reports – Information – *No Action*
    a. Caltrans District 1 – Projects Update and Information
    b. Mendocino Transit Authority
    c. Great Redwood Trail Agency
    d. MCOG Staff – Summary of Meetings
    e. MCOG Administration Staff – *verbal reports*
        i. Miscellaneous
        ii. Next Meeting Date – Monday, October 5, 2026 – Possible Transportation Tour
    f. MCOG Planning Staff –
        i. Work Element 5 – Mendocino County Sea Level Rise Roadway Impact Study
        ii. Work Element 8 – Regional Vehicle Miles Traveled (VMT) Mitigation Program
        iii. Work Element 10 – SR 20 Willits Multimodal Circ. & Intersection Study
        iv. Work Element 11– Pavement Management Program Update
        v. Miscellaneous
    g. Northern Rural Energy Network (NREN) Staff
    h. MCOG Directors
    i. California Association of Councils of Governments (CALCOG) Delegates

ADJOURNMENT

16. Adjourn

AMERICANS WITH DISABILITIES ACT (ADA) and TRANSLATION REQUESTS

Persons who require special accommodations, accessible seating, or documentation in alternative formats under the Americans with Disabilities Act, or persons who require interpretation services (free of charge) are advised to contact the MCOG office at (707) 463-1859, **at least five days** before the meeting.
Las personas que requieren alojamiento especial, asientos accesibles, o documentación en formatos alternativos de acuerdo con la Ley de Estadounidenses con Discapacidades, o personas que requieren servicios de interpretación (sin cargo) deben comunicarse con MCOG (707) 463-1859, por lo menos cinco días antes de la reunión.

ADDITIONS TO AGENDA

The Brown Act, Section 54954.2, states that the Board may take action on off-agenda items when: a majority vote determines that an "emergency situation" exists as defined in Section 54956.5, **or** a two-thirds vote of the body, or a unanimous vote of those present, determines that there is a need to take immediate action <u>and</u> the need for action arose after the agenda was legally posted, **or** the item was continued from a prior, legally posted meeting not more than five calendar days before this meeting.

CLOSED SESSION

If agendized, MCOG may adjourn to a closed session to consider litigation or personnel matters (i.e. contractor agreements). Discussion of litigation or pending litigation may be held in closed session by authority of Govt. Code Section 54956.9; discussion of personnel matters by authority of Govt. Code Section 54957.

POSTED 8/17/2026 Next Resolution Number: M2026-11

MENDOCINO COUNCIL OF GOVERNMENTS
STAFF REPORT

TITLE: Regional Housing Needs Allocation Public Hearing on Appeal of Draft Allocation

DATE PREPARED: 8/17/26

SUBMITTED BY: James Sookne, Program Manager

MEETING DATE: 8/24/26

BACKGROUND: The Regional Housing Needs Allocation (RHNA) process is used to develop a projection of additional housing units needed to accommodate projected household growth of all income levels for a set eight-year period (new cycle to cover 2027 to 2035). It began with the Department of Housing and Community Development (HCD) issuing a RHNA Determination to the Mendocino Council of Governments (MCOG) on August 15, consisting of the projected number of new housing units needed throughout the region over that period. This number is developed based on a variety of factors including demographic projections and the propensity of population groups to form households.

The August 15 letter from HCD assigned the Mendocino County region a total allocation of 6,456 units for the new planning period, a roughly 250% increase in needed units from the previous RHNA planning period. Per Government Code (GC) Section 65584.01(c), within 30 days following receipt of HCD's determination, MCOG may file an objection and propose an alternative determination. On September 14, 2025, following collaboration with community development officials, MCOG sent a letter (see Exhibit A) of objection along with an alternative determination to HCD citing regional demographics and characteristics, impacts of climate change, and the reliability of the data that HCD used to calculate some of the factors impacting the allocation. Unfortunately, HCD denied MCOG's appeal of the determination (see Exhibit B).

The next step in the process was to develop a methodology that would be used to allocate housing units to the individual jurisdictions. Per statute, a public hearing is required during the methodology's development, after which the draft methodology can be submitted to HCD to begin their 60-day review. A public hearing on the original draft methodology, which was essentially the same methodology that we've used for the last several cycles, was held at the October 6, 2025, Board meeting and subsequently submitted to HCD for review. MCOG received a letter from HCD on October 28, 2025, stating that MCOG's draft methodology was not acceptable. Although we had used the methodology previously, HCD did not have approval authority for the methodology in those previous cycles.

MCOG then worked the Methodology Committee, comprised of community development staff from the local jurisdictions, to revise the draft methodology. A second iteration, one that we believed would address their concerns, was submitted to HCD on December 4, 2025. This version went into more detail on which factors would be considered, included base calculations, and stated that some manual adjustments would be made during the allocation process. On January 8, 2026, MCOG received correspondence from HCD stating that they were unable to complete their review process until all manual adjustments were made. Essentially, HCD was requiring us to provide them with a draft allocation at that point, not just the methodology. MCOG staff pushed back on these demands, but HCD was unwilling to accept anything that did not include the draft allocation. Staff again met with the Methodology Committee on January 23 to discuss further changes. A third iteration was submitted to HCD on February 10, 2026, which officially started HCD's 60-day review period.

On April 3, staff received a letter from HCD detailing their review of the draft methodology. HCD determined that what staff submitted in February didn't further statutory objectives two and three which require the promotion of infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns and achievement of the region's greenhouse gas reductions; and improve the balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers. Staff met with HCD on April 7 and May 6 to discuss their findings and what further changes were needed to get their approval. Following each meeting with HCD, staff met with the Methodology Committee to discuss HCD's findings and the additional changes they were requiring. Based on guidance from HCD and feedback from the Methodology Committee, MCOG submitted the final draft methodology (see Exhibit C) on May 15, which HCD approved (see Exhibit D) on May 18.

Following HCD's approval, MCOG brought the draft methodology before the Board for adoption on June 1, 2026. Following discussion and a public hearing, the Board approved the draft methodology and directed staff to issue the draft RHNA allocation (see the table below) to the local jurisdictions.

Categories	HCD Determination	Fort Bragg	Point Arena	Ukiah	Willits	Unincorporated
Acutely Low	533	43	5	218	52	215
Extremely Low	891	108	6	207	85	485
Very Low	677	97	5	120	32	423
Low	1,151	137	8	291	95	620
Moderate	648	52	3	145	35	413
Above Moderate	2,556	231	8	519	174	1,624
TOTAL	6,456	668	35	1,500	376	3,780

Per GC 65584.05(b), local jurisdictions may appeal the draft allocation within 30 days of receipt. Appeals shall be limited to any of the following circumstances:

1. The council of governments or delegate subregion, as applicable, failed to adequately consider the information submitted pursuant to subdivision (b) of Section 65584.04.
2. The council of governments or delegate subregion, as applicable, failed to determine the share of the regional housing need in accordance with the information described in, and the methodology established pursuant to, Section 65584.04, and in a manner that furthers, and does not undermine, the intent of the objectives listed in subdivision (d) of Section 65584.
3. A significant and unforeseen change in circumstances has occurred in the local jurisdiction or jurisdictions that merits a revision of the information submitted pursuant to subdivision (b) of Section 65584.04. Appeals on this basis shall only be made by the jurisdiction or jurisdictions where the change in circumstances has occurred.

With the draft allocation being issued on June 3, 2026, local jurisdictions had until July 3, 2026, to submit an appeal. On June 29, 2006, MCOG received an appeal from the City of Ukiah (Exhibit E). Following the close of the appeal period, GC 65584.05(c) allows the local agencies and HCD to comment on any appeals received. The comment period was from July 8, 2026, through August 7, 2026, providing enough time for MCOG to properly notice (Exhibit F) the public hearing required by GC 65584.05(d) to be held at the August 24 Board Meeting. Staff received a comment letter from the County on August 13, 2026. Although it was after the comment period ended, it has been attached (Exhibit G) so that it may become part of the public record.

Following the public hearing, the Board shall make a final determination that either accepts, rejects, or modifies each appeal. Per GC 65584.05(e)(1), "Final determinations shall be based upon the information and methodology described in Section 65584.04 and whether the revision is necessary to further the objectives listed in subdivision (d) of Section 65584."

Staff has reviewed the City of Ukiah's appeal and provided some analysis and additional context to assist the Board in their determination. In the City's appeal, they made the following two points as the basis for their appeal:

1. MCOG failed to consider information submitted by the City of Ukiah in its local jurisdiction survey, as required by Government Code, subdivision (b) of Section 65584.04.
2. MCOG failed to determine the share of the regional housing need in accordance with the information described in, and the methodology established pursuant to, Section 64484.04, and in a manner that furthers, and does not undermine, the intent of the objectives listed in subdivision (d) of Section 65584.

First, it should be noted that the first basis described for the City's appeal seems to focus largely on the Regional Housing Needs Determination (RHND), not the allocation. The RHND is something that is issued to a region by the State. There is a provision in statute for COGs to appeal the determination, limited to specific bases. We developed and submitted an appeal in collaboration with local agencies, although the State denied our appeal. There is no mechanism for local agency appeal of the determination. Following the State's decision on our appeal, the determination stands. The COG does not approve or adopt the RHND, as incorrectly stated in the City's letter.

In their argument for the first point, the City claims that "MCOG adopted a methodology with known errors instead of adopting a methodology based on information submitted by the City of Ukiah in its local jurisdiction survey (and affirmed by MCOG staff). The premise behind this argument is false. The methodology itself is based on analyzing various data sets used by HCD such as median household income, overcrowding, and cost burden as well as some manual adjustments. All of the calculations and manual adjustments were presented to the local jurisdictions throughout the process and prior to submittal to HCD. Although the jurisdictions, and MCOG, didn't necessarily like the data that was being used in the analysis, there was consensus for how the methodology was developed. The City's reference to "known errors" refers to the data that was used in HCD's calculation of the *determination*, not the methodology. As previously stated, MCOG unsuccessfully appealed this in 2025. The determination, and the data used to calculate it, and the methodology are two separate things.

The City also states that "MCOG's resulting consultations with local government planning representatives were a series of bargaining-style negotiations, not in any way based upon the very data that was supposedly underpinning them." As an example of this, they cited an email from MCOG to the local jurisdictions, stating that MCOG had met with HCD staff to gain additional clarity on what would be needed to get their approval of the methodology. HCD's biggest issue was their belief that Ukiah needed to take on additional low-income units since they, out of all the jurisdictions, had the most resources and jobs available to that population. Additionally, adding more units to Ukiah would reduce vehicle miles traveled (VMT) and greenhouse gas (GHG) emissions, as it has a lower per capita VMT than other jurisdictions. Although staff had told HCD that MCOG should not need to address the GHG targets described in Objective 2, since Mendocino County doesn't have air quality targets designated by CARB, they were still considering this portion of the objective. In a previous meeting with HCD, staff had learned that they were using an internally developed spreadsheet to calculate what they believed our allocation should be and using that as a determining factor in their approval. HCD refused to share this spreadsheet with us, even after a PRA request. Knowing that HCD had already established target numbers, MCOG tried to get a definitive answer from HCD of the target that would be deemed acceptable, rather than going through more unsuccessful iterations, and was given a range of 200 to 250 additional units for Ukiah. Based on this, MCOG proposed to the local agency representatives an addition of 225 units to the City's allocation, the middle of the range, to hopefully ensure approval by HCD. In a subsequent discussion with HCD staff to further discuss the inapplicability of GHG targets in our region, HCD staff did indicate that they would accept a slightly lower shift of units to the City than previously stated. Following this, we held a meeting with the group to discuss revisions. During that meeting, Craig Schlatter, Ukiah's Community Development Director, requested that the number be reduced to 135 so that the City's total would be exactly 1,500 units. His thinking behind this was that 1,500 looks more arbitrary than 1,590, which is what the City's total would have been based on the calculations in the methodology. The County agreed to take the additional 90 units since it would add to an already unrealistic amount.

Following this meeting, MCOG met with HCD to discuss the proposed shift of 135 units rather than 225, to be distributed across all six income categories rather than just low income and below. HCD ultimately agreed that this would be acceptable, which is what MCOG presented in the adopted methodology.

When considering the second basis point, it is important to keep the regional perspective in mind, which was a large part of HCD's approach when considering our multiple iterations of the methodology used in the allocation. They were considering how our total regional determination (assigned by the State) was distributed among the five jurisdictions, not how each of those jurisdictions would accommodate the allocation which is done through their housing elements. This regional viewpoint meant that in order to provide socioeconomic equity and opportunity, as well as promote efficient development patterns, HCD required us to assign more units to the jurisdiction with the most access to jobs and affordable housing and the lowest average per capita VMT.

The City states that "MCOG's RHNA methodology also places tremendous pressure on the City to successfully annex unincorporated territory to meet RHNA goals." While this statement makes some sense, GC 65584.07(d) would require that RHNA units be transferred from the County to the City if such an annexation were to occur.

The City claims that "Assignment of 1,500 units of housing, including a greater share of low-income households, will perpetuate, rather than replace, the increasing segregation of lower income households in this area of Ukiah." Looking at the total share of low-income units (which includes acutely low through low) in the table above, the City of Ukiah has the lowest share of low-income units (see table below) of all incorporated cities. Furthermore, how units get sited within a jurisdiction is something that is addressed in their housing element, not the RHNA process.

Category	Fort Bragg	Point Arena	Ukiah	Willits	Unincorporated
Low-Income	57.63%	68.57%	55.73%	70.21%	46.11%

The City made two requests in their appeal. The first is to reduce their allocation by 612 units, which is based on the alternative determination of 4,936 that MCOG tried to appeal for, and lost, in 2025. The second is to transfer 225 low-income units back to the County.

Their first request shouldn't be considered since it is based off something that never happened and can't be changed. Their second request is based on two factually incorrect statements; the first being that the total units transferred to them were 225 and the second being that they were all low-income units. That being said, the following are potential determinations that the Board could make:

1. Deny the City's appeal, leaving the allocation of RHNA units as presented in the methodology.
2. Grant a modified version of the City's second request, transferring up to 135 units, as distributed in the methodology, from the City back to the County.
3. Grant the City's second request as written, transferring 225 low-income units from the City to the County.

4. Grant the City's first request, reducing their allocation by 612 units, based on the denied alternative determination.

Once the Board makes a determination, staff will incorporate the allocation into the final allocation plan for adoption by the Board at a future meeting. Once adopted, it will be sent to HCD where, per GC 65584.04(g), they "shall determine if the final allocation plan is consistent with the existing and projected housing need for the region, as determined pursuant to Section 65584.01. The department may revise the determination of the council of governments if necessary to obtain this consistency."

Based on MCOG's previous interactions with HCD, staff believes that it's unlikely that they will accept any modifications to the allocation of RHNA units as proposed in the adopted methodology. Therefore, staff is recommending that the Board deny the City of Ukiah's appeal of the draft allocation. However, we do recognize that HCD's requirements have resulted in a large number of units overall for Ukiah. Therefore, if the Board wants to consider any revisions to the allocation, staff only recommends considering determination #2 since it is the smallest potential revision. The Board should be aware, however, that this will potentially further delay the local agencies' ability to move forward with their housing elements, as HCD may modify the allocation following adoption.

ACTION REQUIRED:

A. Make a finding that proper notice of the meeting has been provided. Notice was published in the Ukiah Daily Journal on 8/14/26.
B. Receive staff report.
C. Open public hearing.
D. Receive public comments.
E. Close public hearing.
F. Make a determination on the City of Ukiah's appeal
G. Direct staff to finalize and issue a proposed RHNA plan

ALTERNATIVES: The Board could choose to go with determinations #3 or #4 as noted above, although these are not recommended.

RECOMMENDATION:

A. Make a determination on the City of Ukiah's appeal of the RHNA draft allocation, choosing either #1 or #2 as noted above.
B. Direct staff to finalize and issue a proposed RHNA plan.

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September 14, 2025

Department of Housing and Community Development
Division of Housing Policy Development
Attn: Marisa Prasse, Fair Housing Section Chief
651 Bannon Street, Ste 400
Sacramento, CA 95811

Re: Regional Housing Needs Determination – Mendocino County

Dear Marisa Prasse:

On August 15, 2025, we received from your office the Regional Housing Needs Determination for Mendocino County. The proposed determination assigns a total of 6,456 housing units to the Mendocino County region. This number was quite a shock considering that in the last RHNA cycle, our determination was 1,845 units for an 8.8 year period. The Cycle 6 determination also represented a dramatic increase from the Cycle 5 determination, which was 250. Although Cycle 6 was a longer planning period than Cycle 5, the change still represents a nearly 900% increase when compared on an annual basis. In the years covered by these planning periods, Mendocino County's population has been relatively stagnant, and even declined in some years. According to Department of Finance estimates, our population in 2014 (start of the Cycle 5 period) was 89,569. Our population projection for 2035 used in the current RHNA determination is only 89,696, a total increase in the years covered by RHNA Cycles 5, 6, and 7 of only 127 people. I understand that the housing determination is based on factors other than just population, but it is hard to make sense of the exponential increases in our determinations while our population has barely changed.

We believe that the numbers included in the determination do not represent a reasonable application of the methodology due to a lack of reliable data resulting in extremely high margins of error for much of the data. For instance, the margins of error for data used to determine the cost burden adjustment, which accounts for the largest adjustment to Mendocino County's housing need determination, have margins of error (MoE) as high as 36%, making the data statistically unreliable. In fact, the only data points for that calculation that are statistically reliable (MoE between 4% and 8%) are the total number of units in each of the payment/ownership categories (with a mortgage, without a mortgage, paying rent, etc.). The data points used in the calculation for overcrowding are even less reliable, with MoE ranging from 35.3% to 125% for the ranges of occupants per room used in the calculation. Similarly, data used to determine vacancy has MoEs as high as 108%.

Regarding the adjustments, the methodology itself appears to be unreasonable as it requires comparison to national data rather than state data or regional data. Through this standardized, homogeneous approach, the state is in effect saying the levers a local jurisdiction has for facilitating housing production in the City of San Francisco are the same as in the City of Ukiah and that the market responds in the same way in each locale, which has been disproven by housing experts and shown in real world examples. The City of Ukiah released a notice of funding availability making $1 million available for developers two years ago but has yet to facilitate a project despite a whole-city, multi-department effort. In a similar region to the north, the City of Eureka has zoned areas allowing for 10-story buildings and created a 2-story minimum but only received push back due to a lack of market demand. Within individual housing markets, different attributes cause variations in pricing and each housing market throughout a state or region behaves differently from others in terms of demand, development pressure, affordability, etc.

In addition to these general concerns with application of the methodology and the methodology itself, we also believe that many characteristics of the composition of our projected population will have an effect on the regional housing need. Relevant characteristics include age, fields of employment, Tribal membership, income and ability which will have specific effects, described here. Factors of our region affecting all future housing which have not been reasonably considered in developing the determination are the limitations posed as a result of wildfire severity, regulatory requirements and restrictions, and requirements of the Coastal Act, further discussed below.

According to the Department of Finance projections, the age groups that are expected to have the most significant growth are those 75 years and over. Unfortunately, Mendocino County does not have services that would support such a large population increase in those age categories. The region lacks the medical services that are needed by older populations, even in our more populated areas. According to Community Health Survey data, lack of providers was the second most significant barrier to healthcare (cost being the first), with 36% of respondents citing this as a problem. As people age and become more dependent on easily accessible medical care, it is unlikely that they would choose to locate in Mendocino County. Older people also are more likely to have mobility limitations. The land that is available for development of new units tends to be outside of the few areas in which transit is available, making healthcare even less accessible. In fact, older people in our local communities often find that it is necessary to relocate outside of the county as they age in order to have better access to healthcare. Unfortunately, this situation is only expected to get worse. Recent federal cuts to Medicaid are expected to have significant impacts to healthcare in the Mendocino region. In a recent Mendocino County Health Summit, in which health care professionals and local leaders discussed upcoming impact to local healthcare, it was noted that the region could lose 600 healthcare jobs as a result of recent legislation. This dire situation is likely to affect the future population by forcing elderly residents to leave as well as those previously employed in our local healthcare industry who will have to leave the area to find employment.

Another characteristic of the composition of our projected population is the presence of ten federally recognized Native American Tribal communities within the region. The members of these communities are part of our population that must be accommodated in the housing needs and housing elements, however, housing needs of these members of the community are sometimes met by the Tribal governments through Tribal development of housing. Unfortunately, the provisions of these Tribal housing units or the available land do not apply toward local progress as long as it is on trust land, and to our knowledge, is not accounted for in any way in the calculation of the housing determination.

A recent factor that restricts our region's ability to properly plan for and develop housing in order to achieve the goals set for us by the State is the recent update to the State's Fire Hazard Severity Zone (FHSZ) maps, which has severely impacted all of Mendocino County, placing over 69% of the region into High or Very High FHSZ. The impacts affect not only the unincorporated areas, but also incorporated cities that have the most availability of services and utilities to support housing. In the recent FHSZ mapping, the City of Ukiah had 1,443 acres categorized as "very high" fire hazard severity zones, an increase from 388, resulting in nearly half of the City now in this zone, including most of the west side of Ukiah. Unfortunately, the area affected most by the expansion encompasses much of the remaining land within the City available for housing development. The City of Ukiah is designated as a ProHousing community, but this change will significantly impact the City's future ability to produce housing for residents. The update also placed 122 acres in the City of Willits into the Very High FHSZ, and much of the unincorporated area around both Willits and Ukiah also fall into this category. While any category of new housing could be a concern in these areas, placing housing for community segments that may face challenges in times of evacuation, particularly the elderly or lower income households without vehicles, is of particular concern.

While the coastal areas of the County are less affected by the fire zones, other constraints impact housing development in those areas. All of Mendocino County faces regulatory challenges when it comes to new development due to our abundance of biological and cultural resources, as well as policies to protect prime agricultural land, but development in the coastal areas are also hindered by further restrictions and requirements of the Coastal Zone. For instance, the City of Fort Bragg as of the latest vacant parcel report, has 11 parcels in the Coastal Zone and 7 in the Inland Zone. Parcels in the Coastal Zone will require multiple studies (botanical, wetland and archaeological), and sometimes require expensive analyses (visual, traffic, and geotechnical). They always require a Coastal Development Permit plus other planning entitlements, and the planning process can be lengthy, and often subject to appeals and/or lawsuits. These constraints make our area less appealing for developers of housing across all segments. In fact, developers have backed out of proposed projects because of these issues and the costs associated with addressing them.

Added in this RHNA cycle is an adjustment for seasonal, recreational or occasional use housing. HCD's background data indicates that the numbers of these units in the ACS increased by 112% between 2015 and 2023. Unfortunately, like many of the data points used to calculate the adjustments, the margin of error for this data is above what's considered acceptable, at 12.5%. In addition, Mendocino County's accessory dwelling unit policies prohibit use of any dwelling on a parcel with an approved ADU to be used in this way, which, along with an eventual saturation in the market, will likely reduce the overall percentage of seasonal or recreational housing units as a total of all new units in the future. Additionally, as a coastal county, Mendocino is subject to maintaining consistency with the Coastal Act's prioritization of lower-cost visitor accommodations and public access to the coast. The Coastal Commission has historically recognized that vacation rentals can provide an important source of visitor accommodations in the coastal zone and has typically found that undue restrictions on this type of lodging are inconsistent with Coastal Act provisions prioritizing public access and visitor-serving uses. We have concerns with our region essentially being penalized with a high RHNA determination as a result of compliance with another State requirement.

Regardless of the challenges noted in this letter, our local agencies *are* making efforts to accommodate and encourage housing development. Multiple agencies have streamlined the process for adding accessory dwelling units. They have reduced regulatory barriers. Municipal utility systems have been improved. Our local jurisdictions have entered into agreements that have facilitated one annexation and paved the way for the possibility of future annexation. The City of Ukiah has achieved ProHousing designation and created a housing trust fund, making funding available to developers. Our local jurisdictions are doing what they can to create more housing for current and future residents. However, an unreasonably high housing needs determination is very likely to put our agencies in the position where they will struggle to meet housing element compliance, in spite of substantial efforts to encourage housing.

Based on the unreasonable application of the methodology and assumptions described previously, as well as the characteristics of our regional population discussed in this letter, we propose an alternative regional housing need determination of 4,936. We have arrived at this alternative by modifying adjustments for cost burden, overcrowding, vacancy, and seasonal/recreational/occasional use units. We believe that data points with a margin of error of 30% of more should not be used. Our agencies should not be put in situations in which they are potentially at risk of lawsuits or other penalties established by statutes related to RHNA and housing elements based on unreliable data. However, if HCD must apply some adjustment across all categories, we propose that where margins of error are greater than 30%, the least detrimental possible value be used to avoid inaccurately and unfairly assigning a higher adjustment when it can't be statistically justified. In addition, we propose reducing the percentage adjustment for seasonal to 5% to address some of the local policy changes regarding short term rentals as well as allow for requirements of the Coastal Act.

We appreciate the opportunity to respond to the housing need determination provided by the Department of Housing and Community Development. We urge HCD to consider this alternative determination for the Mendocino County region. Unrealistically high numbers will make our local agencies vulnerable to lawsuits and other repercussions that will result from housing goals they are not able to meet despite local efforts.

Sincerely,

Nephele Barrett

Nephele Barrett
Executive Director

cc: Craig Schlatter, Ukiah
Jesse Davis, Ukiah
Dusty Duley, Willits
Sarah Peters, Fort Bragg
Paul Anderson, Point Arena
Julia Krog, County of Mendocino
Liam Crowley, County of Mendocino

STATE OF CALIFORNIA - BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY GAVIN NEWSOM, *Governor*

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT
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October 29, 2025

Nephele Barrett
Executive Director
Mendocino Council of Governments
525 South Main Street, Suite B
Ukiah CA 95482

Dear Nephele Barrett,

RE: Final Regional Housing Need Determination Objection Response

The California Department of Housing and Community Development (HCD) has received and reviewed your objection to the Mendocino Council of Governments (MCOG)'s final Regional Housing Need Determination (RHND), which was provided to HCD on September 14, 2025. HCD is reporting the results of its review and consideration, pursuant to Government Code section 65584.01(c)(3).

HCD began the consultation period with a meeting with MCOG on June 12, 2025, and requested that MCOG provide data to HCD for use in the region's RHNA, pursuant to Government Code section 65584.01(b)(1-2). MCOG did not provide HCD with any relevant data pursuant to Government Code section 65584.01(b)(1-2) during the consultation period, and HCD issued MCOG their final determination on August 15, 2025 of **6,456** units. Objections to the RHND must be based on or substantiate either of the following, pursuant to Government Code section 65584.01(c)(2)(A-B):

- The department failed to base its determination on the population projection for the region established pursuant to Government Code section 65584.01(a). If such failure is asserted, the council of governments shall identify the population projection which they believe should instead be used for the determination and explain the basis for its rationale.

- The regional housing need determined by the department is not a reasonable application of the methodology and not based on reasonable assumptions determined pursuant to Government Code section 65584.01(b). The objection shall include a proposed alternative determination of its regional housing need, including analysis of why the proposed alternative would be a more reasonable application of the methodology and assumptions determined pursuant to Government Code section 65584.01(b).

The objections raised by MCOG do not satisfy either of the above criteria. HCD based its determination on population and household projections supplied by the California Department of Finance (DOF) Demographic Research Unit, in accordance with Government Code section 65584.01(a). The RHND for a region shall be based on DOF population and household projections, unless the region can provide HCD with an alternative population and household projections pursuant to Government Code section 65584.01(a). During the consultation period, HCD did not receive alternative population and household projection data from MCOG. Therefore, HCD used DOF population and household projections in MCOG's RHND. Furthermore, in calculating the RHND, HCD adhered to the procedures outlined in Government Code section 65584.01(b) and applied the determination in an appropriate manner.

There are several reasons for the increase in MCOG's 7th cycle Regional Housing Needs Determination (RHND) as compared to the 5th and 6th cycles. Most notably, MCOG's 6th cycle RHND did not include any adjustments to capture the housing need that stems from pent-up demand within the existing population. In most regions of the state, the housing needs of the existing population account for the largest share of a region's RHND. Furthermore, new legislative requirements and RHND methodology updates have been added to the RHND process since MCOG received its 6th cycle RHND. Methodological adjustments added to the RHND between the 6th and 7th cycles include cost burden, state of emergency, homelessness, jobs-housing, replacement for seasonal, recreational, and occasional-use homes, and owner and renter vacancy rate adjustments. The majority of MCOG's 7th cycle RHND reflects the substantial housing needs of the existing population. The housing needs of projected households only account for approximately 1,720 (about 30%) of the region's total 7th cycle RHND of 6,456. Finally, in the objection letter sent to HCD on September 14, 2025, MCOG provided an alternative methodology based on modifications to the United States Census Bureau data and a reduced cap on seasonal, recreational, and occasional use homes. The alternative methodology proposed by MCOG is not a more appropriate application of the determination methodology, and if used would instead result in HCD applying the methodology inconsistently between regions.

The RHND establishes the minimum number of homes needed to address the region's housing needs of both the current and projected population. MCOG must comprehensively plan for the substantial housing needs of the existing population, in addition to the population increase projected for the MCOG region. Notably, the RHND is a requirement that the region zone sufficiently in order for these homes to have the potential to be built, but it is not a guarantee that these homes will be built.

The following briefly responds to each of the points raised in the MCOG objection:

<u>Data Sources & Margin of Error (MoE)</u>
No changes have been made to the data sources used in the methodology. The United States Census Bureau's 5-year American Community Survey (ACS) MoE represents the difference between the upper and lower confidence bounds, and all ACS surveys are based on a 90% confidence level, meaning there is roughly 90% certainty that the actual estimate falls between the upper and lower bounds of the

confidence interval. MCOG states that some US Census Bureau data points for cost burden, overcrowding, and vacancy adjustments have MoEs of 35%, 125%, and 108%, respectively, relative to their estimates. These MoEs are higher than average for California but are in line with comparable rural counties or counties of a similar size, such as Lake, Nevada, San Benito, Sutter, and Yuba. The MoEs for these data points in Mendocino County are not outliers among similar regions. In general, geographies with smaller populations have larger MoEs, as the MoE increases as the population that is being sampled in the ACS survey decreases.

Furthermore, the United States Census Bureau maintains rigorous informational and statistical quality standards[1], and is the highest quality data source available to HCD for the required RHNA analyses. While the COG can inform and share other acceptable data sources with HCD during the consultation process, HCD uses the highest quality data available in its RHNA process, pursuant to Government Code section 65584.01, which is usually Census and ACS data. Census data uses rigorous statistical and quality standards and is the standard data used by academics, demographers, and social scientists. HCD has consistently used Census data in the development of RHNDs in the past, and believes it is appropriate to continue to rely on Census data in calculating MCOG's housing needs.

<u>Comparison to National Average – Cost-burden and Overcrowding</u>
No changes have been made to the cost-burden or overcrowding adjustments. The RHND methodology has two adjustments that compare the regional rate to the national rate. The overcrowding and cost-burden adjustment compare the regional rate to the national average, which is required pursuant to Government Code section 65584.01(b)(1)(C)&(H). HCD uses the national average as a comparison benchmark, which was used throughout the 6th cycle as well. As the housing crisis is experienced nationwide, even the national average does not reflect a desirable rate of cost-burden and overcrowding, and by benchmarking against the national average, HCD is being conservative in its estimates of housing needs.

<u>Comparison to Healthy Housing Market – Vacancy Rate</u>
No changes have been made to the vacancy rate adjustment. The vacancy rate adjustment compares the regional vacancy rate to the vacancy rate for a healthy housing market by tenure, pursuant to Government Code section 65584.01(b)(1)(E). The vacancy rates in the RHND methodology align with research findings on what vacancy rates are necessary to have a healthy housing market.[2, 3, 4]

<u>Population Age Groups</u>
No change has been made to the Department of Finance projections. The MCOG

[1] United States Office of Management and Budget, Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies, Federal Register, Washington D.C., February 22, 2002, 67 FR 8452-8460, https://www.federalregister.gov/documents/2002/02/22/R2-59/guidelines-for-ensuring-and-maximizing-the-quality-objectivity-utility-and-integrity-of-information, Accessed on 10 October 2025.
[2] Bluestone, Barry, A New Paradigm for Housing in Greater Boston, The Center for Urban and Regional Policy Northeastern University, February 2001.
[3] Bluestone, Barry, The Urban Experience: Economics, Society, and Public Policy, Oxford University Press, August, 2008
[4] Mallach, Alan, The Empty House Next Door, Lincoln Institute of Land Policy, May 2018

region has a large cohort of residents who will continue to age over the projection period. This fact, along with prior historical trends provided by the Department of Finance, shows there is relatively little out-migration as individuals continue to age within the MCOG region. Potential impacts and migration related to healthcare services are speculative and are not considered in the Department of Finance population and household forecasts. However, when developing the allocation methodology pursuant to Government Code section 65584.04(e), MCOG may consider additional factors, so long as those additional factors do not undermine the statutory objectives of RHNA pursuant to Government Code section 65584(d).

Tribal Housing

No changes have been made to reduce the number of households planned in the MCOG region by the amount of household growth expected on tribal lands. The region should plan for these homes outside of tribal lands. Additionally, Senate Bill 507, which becomes effective on January 1, 2026, will allow jurisdictions to enter into voluntary agreements with tribal entities to allow new tribal housing projects to count towards a jurisdiction's RHNA, if the site is located within the boundaries of, or contiguous to the respective jurisdiction, pursuant to added Government Code section 65584.2.2.

Locational Constraints

No modifications have been made to reduce the number of households planned in the MCOG region based on locational constraints. The RHND methodology establishes the minimum number of homes needed to house the region's anticipated growth and meet current, pent-up demand for housing within the existing population. Locational constraints are not one of the methodological constraints that can be considered as part of the RHND methodology, pursuant to Government Code section 65584.01. Locational constraints such as wildfire risk, land designated to protect open space, and environmental habitats can be considered by the COG when it is developing its allocation methodology pursuant to Government Code section 65584.04(e).

Replacement Adjustment Seasonal, Recreational, or Occasional Use Housing Units

No change has been made to the seasonal, recreational, or occasional use adjustment. For the 7th cycle, HCD implemented the seasonal, recreational, or occasional use housing unit adjustment to ensure units not available as housing for year around permanent residents are accounted for in the RHND methodology. The MCOG region has seen a dramatic increase in these types of units over the prior planning period, which resulted in an initial adjustment of 212.66%. An adjustment over 100% denotes that the region is on net losing housing units used as primary residences as units convert to uses like second homes, short-term rentals, and other non-permanent residences. However, while this remains a significant policy consideration, HCD decided to cap this adjustment at 10%. This 10% cap is significantly lower than the initial adjustment and consistent with the caps HCD applies to other adjustments. Finally, MCOG stated that the MoE for the seasonal, recreational, and occasional use adjustment of 12.5% makes this data point inappropriate to use. As detailed in the aforementioned section, ACS data uses rigorous statistical and quality standards, and the MoE for this data point is in line with other similar regions.

Next Steps
As you know, MCOG is responsible for adopting an allocation methodology and RHNA Plan for the *projection* period beginning June 30, 2027, and ending August 15, 2035. Pursuant to Government Code section 65584(d), the methodology to prepare MCOG's RHNA plan must further the following objectives:

(1) Increasing the housing supply and mix of housing types, tenure, and affordability
(2) Promoting infill development and socioeconomic equity, protecting environmental and agricultural resources, and encouraging efficient development patterns
(3) Promoting an improved intraregional relationship between jobs and housing
(4) Balancing disproportionate household income distributions
(5) Affirmatively furthering fair housing

Pursuant to Government Code section 65584.04(e), to the extent data is available, MCOG shall consider including the factors listed in Government Code section 65584.04(e) to develop its RHNA plan. Also, pursuant to Government Code section 65584.04(f), MCOG must explain in writing how each of these factors was incorporated into the RHNA plan methodology and how the methodology furthers the statutory objectives described above.

HCD appreciates the active role of MCOG staff in providing data and input throughout the consultation process. HCD especially thanks Nephele Barrett and Lisa Davey-Bates.

HCD looks forward to its continued partnership with MCOG to assist MCOG's member jurisdictions meet and exceed the planning and production of the region's housing needs. HCD encourages MCOG jurisdictions to consider the many affordable housing and community development resources available to local governments. HCD's programs can be found at https://www.hcd.ca.gov/grantsfunding/nofas.shtml. HCD is also available to provide technical assistance to jurisdictions as they begin their housing element updates.

If HCD can provide any additional assistance, or if you, or your staff, have any questions, please contact Taylor Price, Specialist, at taylor.price@hcd.ca.gov.

Sincerely,

Marisa Prasse
Fair Housing Section Chief

Cc: Lisa Davey-Bates, Planning Principal, Mendocino Council of Governments
Loretta Ellard, Deputy Planner, Mendocino Council of Governments
Jaclyn Christian, Associate Planner, Mendocino Council of Governments
James Sookne, Program Manager, Mendocino Council of Governments
Hector Ortega, Regional Project Analyst, Mendocino Council of Governments

Exhibit # 3.c

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	Unincorportated 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

Next, a 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

Lower-income Jobs-to-Housing Ratio Adjustment

After an initial review by HCD of the potential allocation figures, additional consultation followed with MCOG staff concerning available employment/housing opportunities within the Cities of Fort Bragg, Ukiah, and Willits. Based on lower-income jobs-to-household ratio data provided by HCD in their letter dated April 3, 2026, MCOG staff was able to calculate the number of jobs in those three jurisdictions as well as the unincorporated County. Staff then used the jobs data from Table 14 to determine the lower-income jobs to RHNA units for the jurisdictions and the region.

Table 14 Lower-income jobs-to-household ratios

	Jobs/HH ratio	HH	Jobs
Fort Bragg	1.46	1,793	2,618
Ukiah	1.55	3,063	4,747
Willits	1.56	1,187	1,852
Unincorporated County	0.65	11,256	7,316
Total	0.96	17,299	16,533

Table 15 Lower-income jobs-to-RHNA unit ratios

	Jobs/RHNA ratio	RHNA	Jobs
Fort Bragg	10.11	259	2,618
Ukiah	7.83	606	4,747
Willits	11.09	167	1,852
Unincorporated County	3.33	2,196	7,316
Region	5.12	3,228	16,533

Using the data from Table 15, staff calculated the number of lower-income units each jurisdiction would need to add to their proposed allocation to achieve the regional ratio of 5.12. Based on this, new lower-income RHNA unit allocations were calculated by applying a 50% factor to the units in Table 16. Table 17 below shows the new lower-income units and the updated jobs-to-RHNA unit ratios.

Table 16 Number of RHNA units needed to achieve the regional ratio of 5.12

Fort Bragg		252
Ukiah		321
Willits		195
Unincorporated County		-768

Table 17 New lower-income RHNA allocations & lower-income jobs/RHNA ratios

	Jobs/RHNA ratio	RHNA	Jobs
Fort Bragg	6.80	385	2,618
Ukiah	6.20	766	4,747
Willits	7.02	264	1,852
Unincorporated County	4.04	1,812	7,316
Total		3,227	

Based on data in Table 18 from HCD's Regional Housing Need Allocation Workbook, Table 19 shows the distribution percentage of lower-income household units for the jurisdictions based on data for the region.

Table 18 Distribution of lower-income households

Categories	Mendocino County	Fort Bragg	Point Arena	Ukiah	Willits	Unincorporated
Acutely Low	2,853	200	9	800	234	1,610
Extremely Low	4,771	501	40	758	381	3,091
Very Low	3,624	452	28	438	143	2,562
Low	6,165	640	37	1,066	428	3,993
TOTAL	17,413	1,793	114	3,062	1,186	11,256

Table 19 Distribution percentage of lower-income household units

Categories	Mendocino County	Fort Bragg	Point Arena	Ukiah	Willits	Unincorporated
Acutely Low	16.4%	11.2%	7.9%	26.1%	19.7%	14.3%
Extremely Low	27.4%	27.9%	35.1%	24.8%	32.1%	27.5%
Very Low	20.8%	25.2%	24.6%	14.3%	12.1%	22.8%
Low	35.4%	35.7%	32.5%	34.8%	36.1%	35.5%
TOTAL	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

Using the data in Table 19, staff then distributed the lower-income allocations from Table 17 across the four lower-income categories. The following manual adjustment was then made to the County's allocation to align the jurisdictions' totals for each income category with HCD's original determination:

- -26 units from Acutely Low
- +4 units to Extremely Low
- +21 units to Very Low
- +1 unit to Low

Tables 20 and 21 show the new distribution of lower-income RHNA units and total RHNA units, respectively.

Table 20 New distribution of lower-income RHNA units

Categories	HCD Determination	Fort Bragg	Point Arena	Ukiah	Willits	Unincorporated
Acutely Low	533	43	5	200	52	233
Extremely Low	891	108	6	190	85	502
Very Low	677	97	5	110	32	433
Low	1,151	137	8	267	95	644
TOTAL	3,252	385	24	767	264	1,812

Table 21 New distribution of total RHNA units

Categories	HCD Determination	Fort Bragg	Point Arena	Ukiah	Willits	Unincorporated
Acutely Low	533	43	5	200	52	233
Extremely Low	891	108	6	190	85	502
Very Low	677	97	5	110	32	433
Low	1,151	137	8	267	95	644
Moderate	648	52	3	131	35	427
Above Moderate	2,556	231	8	467	174	1,676
TOTAL	6,456	668	35	1,365	473	3,915

Finally, additional manual adjustments were made between the County and City of Ukiah, shifting a total of 135 units from the County to Ukiah, helping to further Objective 2. This final adjustment was the result of HCD review and direction to shift units from the unincorporated area into the City of Ukiah in an effort to reduce vehicle miles traveled and increase access to jobs, including out of county jobs. Although units within the unincorporated county could also provide access to jobs, HCD looks at a jurisdiction's average per capita VMT when conducting their assessment, which is higher in the unincorporated area. Table 22 shows the distribution of the 135 units across the income categories based on Ukiah's data in Table 4. Table 23 incorporates the noted additions/subtractions, which will also be proposed as the final allocation for the region. These final adjustments should ensure compliance with state Objectives 2, 3, and 5 under Government Code Section 65584(d).

Table 22 Manual adjustment of 135 units from the County to Ukiah

Categories	Uninc. County	Ukiah
Acutely Low	-18	18
Extremely Low	-17	17
Very Low	-10	10
Low	-24	24
Moderate	-14	14
Above Moderate	-52	52
TOTAL	-135	135

Table 23 Final distribution of RHNA units after all adjustments

Categories	HCD Determination	Fort Bragg	Point Arena	Ukiah	Willits	Unincorporated
Acutely Low	533	43	5	218	52	215
Extremely Low	891	108	6	207	85	485
Very Low	677	97	5	120	32	423
Low	1,151	137	8	291	95	620
Moderate	648	52	3	145	35	413
Above Moderate	2,556	231	8	519	174	1,624
TOTAL	6,456	668	35	1,500	473	3,780

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 (VMT) or greenhouse gas (GHG) emissions related impacts. Furthering this objective are the adjustments made regarding the lower-income jobs to housing units ratio, which transferred units from the unincorporated County to the Cities of Fort Bragg, Ukiah, and Willits, as well as the additional manual transfer of units from the County to the City of Ukiah as directed by HCD. Both adjustments promote infill, thereby further reducing VMT and GHG emissions. It's important to note that while the adjustments made to further this objective may reduce VMT and GHG emissions, the portion of Objective 2 regarding achieving GHG reduction targets provided by the California Air Resources Board (CARB) pursuant to Section 65080 does not apply to the Mendocino County region. The targets referenced in Section 65080 are set by CARB for areas under the jurisdiction of a metropolitan planning organization, which Mendocino County is not.

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. Additionally, the adjustments made regarding the lower-income jobs to housing units ratio further improves the intraregional relationship between jobs and housing by transferring units from the unincorporated County to the Cities of Fort Bragg, Ukiah, and Willits.

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 (GHG) 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. Additionally, the Mendocino County region doesn't have any GHG emission targets set by the California Air Resources Board.
13. **Other factors adopted by MCOG**
    No other policy factors have been adopted by MCOG with respect to housing needs allocation.

STATE OF CALIFORNIA - BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY GAVIN NEWSOM, *Governor*

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May 18, 2026

Nephele Barrett, Executive Director
Mendocino Council of Governments
525 South Main Street, Suite B
Ukiah CA 95482

Dear Nephele Barrett,

RE: Review of Draft Regional Housing Need Allocation (RHNA) Methodology

Thank you for submitting the revised draft Seventh Cycle Regional Housing Need Allocation (RHNA) Methodology for the Mendocino Council of Governments (MCOG). Pursuant to Government Code section 65584.04(i)(2), the California Department of Housing and Community Development (HCD) is required to review the revised draft RHNA methodology to determine whether the methodology furthers the statutory objectives described in Government Code section 65584(d).

The revised draft RHNA methodology submitted to the department on May 15, 2026, begins with the total regional determination provided by HCD of 6,456 units. The methodology first allocates units to each jurisdiction based on its share of Mendocino County's population across the six income categories. Next, the base allocation is adjusted according to each jurisdiction's existing distribution of population by median household income levels. Additional adjustments are made by comparing regional cost burden and overcrowding data with jurisdiction-specific cost burden and overcrowding data.

Furthermore, the methodology applies a series of manual adjustments. The first manual adjustment transfers a small number of units to the City of Ukiah from the Unincorporated County to account for the Western Hills Annexation. Second, the methodology applies a small manual adjustment to the low-income category based on each jurisdiction's opportunity score, as identified in the 2025 COG Geography TCAC/HCD Opportunity Map. As a result, the City of Point Arena receives an increase in its lower-income categories, the City of Willits receives a decrease in its lower-income categories but an increase in its above moderate category, and the City of Fort Bragg receives a decrease in its above moderate category. Third, the methodology applies a manual adjustment shifting 50 percent of low-income units needed to match each jurisdiction's low-income jobs to housing units ratio with the regional ratio. Next the methodology applies small manual adjustments to the county's low-income allocations to align with the HCD determination. Finally, the methodology applies a manual adjustment of 135 units transferred to Ukiah from the County to improve jobs access and promote infill development.

HCD has completed its review of the revised methodology and finds that the draft RHNA Methodology furthers the statutory objectives described in Government Code section 65584(d).[1] Further, the revised methodology, after consultation with the department, has been found to be acceptable, pursuant to Government Code section 65584.04(i)(2). MCOG's revised draft methodology directs more RHNA units – particularly lower income units – to jurisdictions with a high share of higher income households, to jurisdictions with more single-family homes, and to jurisdictions with a greater percentage of their population living in high or highest opportunity areas. Additionally, the draft methodology purposefully allocates an increased share of RHNA units to job-rich jurisdictions with greater access to jobs in infill areas with lower average vehicle miles traveled (VMT).

Below is a brief summary of findings related to each statutory objective described within Government Code section 65584(d):

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.

> MCOG's revised draft methodology results in higher-income jurisdictions receiving a greater proportion of the lower-income RHNA. Jurisdictions with a higher percentage of single-family homes receive more lower-income RHNA. Additionally, jurisdictions with higher owner-occupied home values and higher rents receive a larger share of the regional RHNA allocation.

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.

> The revised draft methodology promotes infill development and efficient development patterns by ensuring that jurisdictions with lower per capita

[1] While HCD finds this methodology furthers statutory objectives, applying this methodology to another region or cycle may not necessarily further the statutory objectives as housing conditions and circumstances may differ.

VMT receive larger shares of the regional RHNA allocation. Additionally, the revised draft methodology allocates a larger share of the regional RHNA to jurisdictions with the largest number of jobs accessible within a 60-minute commute via transit and automobile.

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.

The draft methodology proportionally allocates more RHNA units to jurisdictions with a higher share of the regional jobs. It assigns a significantly larger proportion of the regional RHNA units to jurisdictions with the highest jobs-to-housing ratios, ensuring that more housing units are directed to areas with the greatest employment opportunities. The draft methodology allocates more of the lower income RHNA units to jurisdictions with a greater share of jobs earning less than $3,333 per month (a proxy for lower-income households [2]).

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.

On average, jurisdictions with a larger existing share of higher-income households[3] receive a higher allocation of lower-income RHNA compared to those with fewer higher-income households in MCOG's draft allocation methodology. This approach helps ensure jurisdictions with concentrations of higher-income households receive more of the lower-income RHNA.

5. Affirmatively furthering fair housing, which 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. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.

Affirmatively furthering fair housing requires that the draft methodology improves access to opportunity within the region. In MCOG's draft methodology, jurisdictions with greater access to opportunity receive a proportionally larger share of the lower-income RHNA. In the context of MCOG's draft methodology, jurisdictions with a higher percentage of their population in high or highest opportunity areas, as indicated in the 2025

[2] Lower-income households is defined as households with incomes less than 80% of Area Median Income.
[3] Higher income households are defined as having incomes greater than 80 percent of the area median income.

COG Geography TCAC/HCD Opportunity Map[4], receive a proportionally greater share of the lower-income regional RHNA. MCOG's methodology ensures that the lower-income RHNA is generally allocated to jurisdictions with the most opportunity.

HCD appreciates the active role of MCOG staff in providing data and input throughout the consultation process, as well as their collaborative work in revising the draft RHNA methodology to ensure compliance with Government Code section 65584(d). HCD especially thanks James Sookne for their significant efforts and assistance.

HCD looks forward to continuing our partnership with MCOG to help its member jurisdictions meet and exceed the planning and production of the region's housing needs.

In the coming months, HCD, in collaboration with MCOG members, will prepare and carry out a technical assistance plan geared to support local governments in preparing the 7th cycle of the housing elements. Further, support opportunities available for the MCOG region this cycle include, but are not limited to:

- Prohousing Designation Program – Ongoing awards distributed over-the-counter to local jurisdictions with compliant Housing Elements and prohousing policies. Those awarded receive additional points on application processing preference when applying to housing and non-housing funding programs including the Affordable Housing & Sustainable Communities (AHSC), Infill Infrastructure Grant (IIG), and Transformative Climate Communities (TCC). HCD's Prohousing Designation Program can be found at https://www.hcd.ca.gov/planning-and-research/prohousing.

- HCD also encourages all Mendocino County local governments to consider the many other affordable housing and community development resources available to local governments, such as the Permanent Local Housing Allocation program. HCD's programs can be found at https://www.hcd.ca.gov/funding/nofa-calendar.

If HCD can provide any additional assistance, or if you, or your staff, have any questions, please contact Balaji Balaganesan, Senior Specialist at Balaji.balaganesan@hcd.ca.gov.

[4] Opportunity score is obtained from the TCAC/HCD Opportunity Maps, specifically the COG Geography version, which can be accessed here: COG Geography TCAC/HCD Opportunity Map - Composite Score (2025) - Overview

Sincerely,

Marisa Prasse
Fair Housing Section Chief

cc: Lisa Davey-Bates, Planning Principal, Mendocino Council of Governments
Loretta Ellard, Deputy Planner, Mendocino Council of Governments
Jaclyn Christian, Associate Planner, Mendocino Council of Governments
James Sookne, Program Manager, Mendocino Council of Governments
Hector Ortega, Regional Project Analyst, Mendocino Council of Governments

City of Ukiah

June 29, 2026

Mendocino Council of Governments
Attn: Nephele Barrett, MCOG Executive Director
525 S Main St, Ste. B
Ukiah, CA 95482

RE: City of Ukiah 7th Cycle Regional Housing Needs Allocation (RHNA) Appeal

Dear Ms. Barrett:

Thank you for the difficult work to ensure the 7th Cycle RHNA is distributed in a way that both ensures compliance with the State RHNA process and attempts to equitably distribute housing production numbers across Mendocino County local governments. The City of Ukiah (Ukiah) has been an active partner in this process, and as evidenced by its performance in meeting 6th Cycle RHNA goals, has taken on its fair share of Mendocino County's housing needs.

As you know, State Department of Housing and Community Development (HCD) staff and planning representatives of Mendocino County local governments participated in a recent call arranged by MCOG staff. During that call, it was Ukiah's performance in meeting its 6th cycle RHNA and achieving its ProHousing designation, not the data or other evidence within the record, that was used to justify the nearly 530% increase in Ukiah's 7th Cycle RHNA determination. HCD's comment, among other questionable sources of housing data documenting the need for the increase, necessitates further review and analysis, which it does not appear MCOG has undertaken on Ukiah's behalf.

Therefore, pursuant to Government Code 65584.05(b), the City of Ukiah is submitting this formal appeal of the Mendocino Council of Governments (MCOG) adopted Regional Housing Needs Allocation (RHNA) methodology and resulting allocation for the 7th Cycle Housing Element. This appeal is submitted pursuant to direction provided by the Ukiah City Council at its regular meeting of June 17, 2026, and within the statutory 30-day appeal period.

BASIS FOR THE APPEAL

1. **MCOG failed to consider information submitted by the City of Ukiah in its local jurisdiction survey, as required by Government Code, subdivision (b) of Section 65584.04.**

In August of 2025, MCOG received the 7th Cycle Regional Housing Needs Determination (RHND) for Mendocino County from HCD, which assigned a total of 6,456 housing units to the Mendocino County region. Because the previous (6th) Cycle, also an eight-year cycle, assigned 1,845 units, and population growth in Mendocino County has been relatively flat over this period, this 250% increase warranted closer scrutiny.

Working closely with planning representatives in the four incorporated cities and the County of Mendocino, MCOG staff submitted a well-articulated, data-driven appeal of HCD's 7th Cycle RHND on September 14, 2025 (Attachment 1). Within this letter, numerous examples are provided by MCOG as to why the 7th Cycle RHND is unreasonable and not supported by data.

As noted in MCOG's letter:

"We believe that the numbers included in the determination do not represent a reasonable application of the methodology due to a lack of reliable data resulting in extremely high margins of error for much of the data…the margins of error for data used to determine the cost burden adjustment, which accounts for the largest adjustment to Mendocino County's housing need determination, have margins of error (MoE) as high as 36%, making the data statistically unreliable…The data points used in the calculation for overcrowding are even less reliable, with MoE ranging from 35.3% to 125% for the ranges of occupants per room used in the calculation."

"…the methodology itself appears to be unreasonable as it requires comparison to national data rather than state data or regional data. Through this standardized, homogeneous approach, the state is in effect saying the levers a local jurisdiction has for facilitating housing production in the City of San Francisco are the same as in the City of Ukiah and that the market responds in the same way in each locale, which has been disproven by housing experts and shown in real world examples."

"…the City of Ukiah had 1,443 acres categorized as "very high" fire hazard severity zones, an increase from 388, resulting in nearly half of the City now in this zone, including most of the west side of Ukiah. Unfortunately, the area affected most by the expansion encompasses much of the remaining land within the City available for housing development."

"Based on the unreasonable application of the methodology and assumptions described previously, as well as the characteristics of our regional population discussed in this letter, we propose an alternative regional housing need determination of 4,936."

Even with MCOG's analysis and research proving numerous data irregularities and inconsistencies in the State's assignment of 6,456 units and proposal of an alternative RHND of 4,936, the MCOG Board ultimately adopted the State's methodology and unit count. **In so doing, MCOG adopted a methodology with known errors instead of adopting a methodology based on information submitted by the City of Ukiah in its local jurisdiction survey (and affirmed by MCOG staff).**

The State, and by extension MCOG through its adoption of the State's methodology, used questionable data to arrive at the RHND. With this number then established, MCOG's resulting consultations with local government planning representatives were a series of bargaining-style negotiations, not in any way based upon the very data that was supposedly underpinning them.

For example, on April 23, 2026, City staff received an email from MCOG staff noting:

"[MCOG staff] met with [HCD staff] a little while ago to get some more clarity. Their suggestion was to shift another 200 – 250 units, preferably lower income, from the County to the City of Ukiah. They felt that this manual adjustment would push the methodology across the finish line. I'm going to split the difference and shift 225 lower-income units."

2. **MCOG failed to determine the share of the regional housing need in accordance with the information described in, and the methodology established pursuant to, Section 65584.04, and in a manner that furthers, and does not undermine, the intent of the objectives listed in subdivision (d) of Section 65584.**

Government Code requires that the RHNA methodology *further, and does not undermine,* the intent of all five listed objectives within 65584.05(d). In City staff's preliminary analysis of the methodology's alignment with these five objectives, it is clear MCOG's RHNA methodology undermines at least two of the stated objectives for Ukiah.

65584.05(d)(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.*

The City of Ukiah is actively attempting annexation of urbanized unincorporated areas adjacent and contiguous to City incorporated boundaries in an attempt to promote infill development and socioeconomic equity, protect environmental and agricultural resources and encourage efficient development patterns. Additionally, the City's implementation of road improvement projects, including the Downtown Streetscape project, encourage active transportation and connectivity between jobs and housing. As enabled through SB 743, the City Council also adopted a hyper-local Ukiah Smart Growth tool, the first known planning tool of its kind, to incentivize and streamline housing near existing job centers.

However, new constraints in Ukiah that limit housing development, such as the 2025 Office of State Fire Marshal-mandated Fire Hazard Severity Zones (FHSZ) and FEMA-mandated flood maps, have resulted in few new opportunities for infill development. Such State housing accelerators like SB 9, which allowed infill accessory dwelling units and subdivision by-right in low density residential zoning districts, are now suspended in nearly half of Ukiah because of the new FHSZs. Due to the misalignment between the unrealistically determined RHND number of 1,500 housing units and existing Ukiah development constraints, new housing development projects, particularly for lower income households, will likely only be built in non-constrained areas.

This will result in at least one, but likely all, of the following four outcomes: 1) increasing of urban sprawl and pressure to convert agriculturally zoned parcels to residential just beyond City limits; 2) pressure to rezone existing commercial areas of the City to residential, even when the market conditions are not appropriate for the very housing the rezoning would be designed to encourage; 3) increased greenhouse gas emissions due to the increase of urban sprawl; and 4) perpetuation of income segregation in certain urbanized areas within and just beyond City limits (see 2 below);

Because neither the local housing market economics nor suitable land exist for Ukiah to accommodate 1,500 housing units, MCOG's RHNA methodology also places tremendous pressure on the City to successfully annex unincorporated territory to meet RHNA goals. A Master Tax Sharing Agreement executed between the City of Ukiah and the County of Mendocino was designed to address and facilitate such a transfer of RHNA from the County to the City. However, with an

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organized and active group of anti-Ukiah Annexation stakeholders and with annexation approval determined by the Mendocino Local Agency Formation Commission, annexation is far from certain.

65584.05(d)(5) Affirmatively furthering fair housing.

65584.05(d)(5)(e) describes “affirmatively furthering fair housing” as *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. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.*

Most new affordable housing projects rely on the Low-Income Housing Tax Credit (LIHTC) Program as the principal source of financing. LIHTC works by providing tax credits to developers, who sell them to investors for cash equity in the affordable housing project; and like any economically-based transaction, limiting risk is of central importance to investors. In general, and especially in rural areas like Ukiah, a way to limit risk is to ensure long-term cash flow of the affordable housing project, which primarily involves limiting vacancies. There are economies of scale in managing and maintaining more units in one location than less units in several locations, and this incentivizes the affordable housing developer to build as many units as possible on one large parcel.

Due to existing development constraints and the availability of few large parcels, reliance on the LIHTC has resulted in the majority of new affordable housing being built in northeastern Ukiah, within and just beyond City boundaries, and specifically in a census tract with a high concentration of low-income households. **Assignment of 1,500 units of housing, including a greater share of low-income households, will perpetuate, rather than replace, the increasing segregation of lower income households in this area of Ukiah. It may also increase concentrated areas of poverty.**

The City will likely lose its ProHousing designation and may even struggle, for the first time in eight years, to make adequate progress in attaining these newly imposed RHNA goals. This would result in the loss of housing and transportation funding and the degrading ability to continue taking meaningful actions that, taken together, address significant disparities in housing needs and access to opportunity.

REQUESTED REVISION

For the reasons described above, the City of Ukiah respectfully requests that MCOG **reduce the regional housing needs allocation for Ukiah by 612 housing units**. This number reflects the proportional share of housing units for Ukiah based upon MCOG’s alternative Mendocino County RHND of 4,936 units. At the minimum, however, and due to the apparently arbitrary nature in which additional low-income housing units were transferred from the County of Mendocino to the City of Ukiah, **the City requests the 225 additional housing units be transferred back to the County**.

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City of Ukiah

While the City certainly recognizes the continuing need for more regional housing, the imposition of this increased proportionate share could penalize the City for our excellent performance record in meeting the 6th Cycle RHNA goals. Please reconsider this regional housing allocation to achieve a more equitable distribution.

Sincerely,

Susan Sher, Mayor
City of Ukiah City Council

Craig Schlatter, AICP
Community Development Director

Enclosures: (1)

CC: District 2 State Senator Mike McGuire, Senate President Pro Tempore
District 2 State Assembly Member Chris Rogers
Maureen "Mo" Mulheren, Second District Supervisor, County of Mendocino
Juan Orozco, Vice Mayor, City of Ukiah City Council
Douglas F. Crane, City of Ukiah City Council
Mari Rodin, City of Ukiah City Council
Heather Criss, City of Ukiah City Council
Sage Sangiacomo, City Manager

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UKIAH, CA 95482

PROOF OF PUBLICATION
(2015.5 C.C.P.)

STATE OF CALIFORNIA
COUNTY OF MENDOCINO

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above entitled matter. I am the principal clerk of the printer of the Ukiah Daily Journal, a newspaper of general circulation, printed and published daily in the City of Ukiah, County of Mendocino and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Mendocino, State of California, under the date of September 22, 1952, Case Number 9267; that the notice, of which the annexed is a printed copy (set in type not smaller than non-pareil), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

08/14/2026

I certify (or declare) under the penalty of perjury that the foregoing is true and correct.

Dated at Ukiah, California,
August 14th, 2026

Sue Fullbright

Sue Fullbright, LEGAL CLERK

Legal No. **0006985334**

NOTICE OF PUBLIC HEARING

NOTICE IS HEREBY GIVEN that the Mendocino Council of Governments (MCOG) has received an appeal of the draft Regional Housing Needs Allocation. The allocation will distribute housing unit needs as assigned by the State of California throughout Mendocino County and the incorporated cities through 2035. Pursuant to Government Code 65584.05(d), MCOG will hold a public hearing on Monday, August 24, 2026, at 1:30 p.m. or as soon thereafter as possible, at the Mendocino County Board of Supervisors Chambers, 501 Low Gap Road, Room 1070, Ukiah, CA to receive public comment on the appeal of the draft allocation. For further information, please contact MCOG at 707-234-3434 or visit the MCOG website, **www.mendocinocog.org**.

Nephele Barrett
Executive Director 8-14/26

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NEPHELE BARRETT, EXECUTIVE DIRECTOR

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August 11, 2026

NOTICE OF PUBLIC HEARING

NOTICE IS HEREBY GIVEN that the Mendocino Council of Governments (MCOG) has received an appeal of the draft Regional Housing Needs Allocation. The allocation will distribute housing unit needs as assigned by the State of California throughout Mendocino County and the incorporated cities through 2035. Pursuant to Government Code 65584.05(d), MCOG will hold a public hearing on Monday, August 24, 2026, at 1:30 p.m. or as soon thereafter as possible, at the Mendocino County Board of Supervisors Chambers, 501 Low Gap Road, Room 1070, Ukiah, CA to receive public comment on the appeal of the draft allocation. For further information, please contact MCOG at 707-234-3434 or visit the MCOG website, www.mendocinocog.org.

Nephele Barrett

Executive Director

COUNTY OF MENDOCINO
Executive Office

SARA PIERCE
INTERIM CHIEF EXECUTIVE OFFICER
CLERK OF THE BOARD

501 Low Gap Rd. Room 1010
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August 13, 2026

Mendocino Council of Governments (MCOG)
Attn: Nephele Barrett, MCOG Executive Director
525 S. Main Street, Suite B
Ukiah, CA 95482

RE: City of Ukiah appeal of 7th Cycle Regional Housing Needs Allocation (RHNA)

Dear Ms. Barrett:

The County of Mendocino (County) has received a copy of the City of Ukiah's (City) appeal letter dated June 29, 2026, regarding the proposed 7th cycle RHNA allocation and wishes to submit the following comments in response pursuant to Government Code section 65584.05(e).

In general, the County agrees with the concerns stated by the City regarding determination of the 7th cycle regional housing need. The development barriers that rural counties and cities face do not seem to be properly acknowledged by the Department of Housing and Community Development (HCD) when performing housing needs assessments and assigning shares, as detailed in the appeal letter. The County's own share of RHNA units saw an increase of 174% for the 7th cycle, despite current census estimates showing a *decrease* of the overall population by 3.8% as of July 1st, 2025[1]. The County is being asked to account for 3,690 new units in a region that has seen flat or negative economic growth and development over the preceding 8 years.

However, the City's first basis for the appeal seems directed at the regional housing need *determination* framework established by state law rather than *allocation* methodology. The City's first basis for the appeal references a local jurisdiction survey process that is associated with MCOG's development of the allocation methodology (California Government Code section 65584.04). However, the City does not provide a copy of its survey responses or other evidence of previous concerns with the allocation methodology; rather, the City references MCOG's prior appeal of the regional housing need *determination* rather than the *allocation* methodology. The City's concerns are misplaced. An appeal of the allocation methodology is not the proper forum to address the City's first basis for the appeal.

[1] Census Quickfacts

The County also disagrees with the assertion that the allocation methodology *"places tremendous pressure on the City to successfully annex unincorporated territory to meet RHNA goals."* As provided by subdivision (d) of California Government Code section 65584.07 and established under the existing Master Tax Sharing Agreement, a reasonable share of allocated units may be transferred from the County to the City in the event of annexation. As such, the City would be burdened with transferred units in addition to previously allocated units in the event of annexation. Unless the City believes that more units would be built on annexed land than the number of units transferred under the Master Tax Sharing Agreement, the County sees no RHNA-related incentive to annex unincorporated lands.

The City's appeal discusses development constraints, including flood mapping and fire hazard zones. Unincorporated County land is subject to similar constraints. The new State Responsibility Fire Hazard Severity Zones adopted by CalFire in 2024 increased the acreage of Very High Fire Hazard Severity Zones in several unincorporated communities. Of the County's more than 3,500 square mile area, approximately 6,000 acres (0.004%) fall into areas that are served by both water and sewer districts, although some of these districts already limit the number of connections that are available or have monthly limits on water usage. Construction costs in the state continue to climb, even for rural areas, such that installation of the infrastructure required to develop higher density multi-family housing is cost-prohibitive for developers. This results in the most realistic areas of future development being located within or adjacent to areas where infrastructure already exists, such as the cities of Ukiah, Willits, and Fort Bragg. Some unincorporated areas of the county may have small potential for additional growth, but likely not to the level imposed by HCD. The County reiterates that most unincorporated areas lack adequate infrastructure (water supply and sewer capacity) to accommodate higher density residential development.

The County supports a logical reassessment of the regional housing needs determination methodology, including state law and HCD's interpretation and regulations based on such law. However, the County does not support the assignment of more units to County responsibility; the appeal letter requests a transfer of 225 housing units back to the County, which is unrealistic given the information contained in the City's own letter as well as the development limitations noted here. As established in subdivision (g) of Government Code section 65584.05, the allocation appeal process is subject to review by HCD to determine if the final allocation plan is *"consistent with the existing and projected housing need for the region, as determined pursuant to Section 65584.01. The department* [HCD] *may revise the determination of the council of governments if necessary to obtain this consistency."* Given MCOG's unsuccessful appeal of the regional housing need determination and lengthy correspondence with HCD regarding the allocation methodology, the County believes that HCD is unlikely to accept any revised allocation plan on appeal. Significant time and staff resources will be used in an exercise of futility which will delay the adoption of each jurisdiction's Housing Element for the 7th cycle. Resources would more appropriately be used advocating legislative reform at the state level.

The County appreciates the difficult work that MCOG has done in negotiation with HCD and understands that a satisfactory outcome for all parties is unlikely. The County is supportive of the affordable housing development to meet the state's needs, but imposing an additional burden on top of an already unrealistic expectation does nothing to accomplish those housing goals either locally or at the state level.

Regards,

Sara Pierce
Interim Chief Executive Officer

Richard Angley
Interim Director, Planning and Building Services

Attachments:

1. 2026-06-29 City of Ukiah Appeal Letter

CC: District 2 State Senator Mike McGuire, Senate President Pro Tempore
District 2 State Assembly Member Chris Rogers
Sage Sangiacomo, Ukiah City Manager
Madeline Cline, First District Supervisor, County of Mendocino
Maureen Mulheren, Second District Supervisor, County of Mendocino
John Haschak, Third District Supervisor, County of Mendocino
Bernie Norvell, Fourth District Supervisor (Chair), County of Mendocino
Ted Williams, Fifth District Supervisor, (Vice-Chair), County of Mendocino

Agenda # 4.
SAFE Meeting
MCOG Meeting
8/24/2026

Mendocino County S.A.F.E.

Service Authority for Freeway Emergencies

Title: Mendocino County SAFE Budget **Date:** 8/14/2026

Submitted By: Michael Villa, Deputy Director/Fiscal Manager **Meeting Date:** 08/24/26

Background: In 1985 the California Legislature passed Senate Bill 1190 to enable counties to generate revenue for the purpose of purchasing, installing, operating and maintaining an emergency motorist aid system. Senate Bill 1199, enacted in January 1986, provided the basic format for the formation of SAFEs, and Assembly Bill 1390, enacted in October 1991, authorized a county and its cities to designate a Council of Governments to serve as a SAFE for the county. Mendocino Council of Governments was designated as the Service Authority for Freeway Emergencies (SAFE).

The program is funded by a $1 fee, included with the annual vehicle registration fee, collected by the California Department of Motor Vehicles and forwarded to the SAFE on a monthly basis. The annual $1 DMV fee is supplemented by any revenue not utilized in the year it was collected (known as Fund Balance), the interest earned on the fund balance, and occasional reimbursements from motorists who damage call boxes. The stream of DMV revenues has remained steady over the past five years.

Correction Notice: This report corrects a clerical error in the budget presented to and approved by the Board on 6/1/26. The Revenues figure originally presented as $278,036 was driven by a FY 25/26 Actual Carryover cell that was referenced to match the FY 25/26 Estimate's Expenditures Subtotal ($150,849), rather than being calculated from the prior year's Actual Fund Balance as in every other year of the budget model. The corrected Revenues figure is $233,953, a reduction of $44,083. Expenses of $127,390 are unaffected. This correction reduces the net funds available above budgeted expenses from $150,646 to $106,563, which is the amount available for new installations, upgrades, and other discretionary items referenced below.

Revenues are projected at $233,953 for the 26/27 Fiscal Year. This includes DMV fees, Interest, and Carryover of the prior year.

Expenses are projected at $127,390 for the 26/27 Fiscal Year. The expenses cover the administration and planning contracts, cellular and satellite services, CHP contract which serves as the primary answering service, and direct expenses for CALSAFE. The remaining funds will be allocated to new installations and upgrades and maintaining existing system, as appropriate.

Action Required:
Approve the corrected 26/27 Mendocino SAFE Budget, superseding the version approved on 6/1/26.

Alternatives:
The Board may identify adjustments to be made prior to adoption.

Recommendation:
Staff recommends that the Board approve the corrected FY 26/27 Mendocino SAFE Budget as presented, reflecting the corrected Revenues figure of $233,953.

Mendocino County Service Authority for Freeway Emergencies (SAFE)
Correction to Program Budget-Adopted June 1, 2026

Year	Fund	2024-25 ACTUAL	2025-26 ESTIMATE	2025-26 ACTUAL	2026-27 PROPOSED BUDGET	Notes
Revenue	2110-760175	Audited		Est/Unaudited		
Dept. of Motor Vehicle Collected Fees		103,729	105,000	103,489	105,000	$1 per annual vehicle registration.
Interest		4,031	1,000	4,631	1,000	
Carryover of Prior Year Unexpended Balance		146,425	106,766	106,766	127,953	Includes carryover from 25/26 Planning contract.
Sub-Total		$ 254,185	$ 212,766	$ 214,886	233,953	
Expenditures	2110-760175					
Administration Contract (Dow & Assoc.)		45,454	43,138	43,138	45,108	Includes administration, monitoring, maintenance computer/phone, weed abatement.
Planning Contract (DBC)		22,776	21,491	12,000	23,062	Contract amount is a maximum. Program is billed for actual hours at the close of the FY.
New System Installations & Upgrades		26,366	30,000	10,614	16,000	FY 25/26 included 10 4G upgrades and transitioned 11 Statellites to 4G. 21 upgrades still needed.
Existing System Maintenance		4,156	10,000	2,475	10,000	Routine as-needed Knightscope Systems service (repairs, etc.) System is aging and we know repairs need to be made and expect that to continue.
New System Installations & Upgrades & Maintenance Credit				(13,089)		Knightscope credited our invoices due to them not being able to properly submit a compliant invoice required.
Cellular / Satellite Service		48,406	43,000	31,500	30,000	Satellite service averages $2,000 (previously $3,500) per month for the 31 Sat Boxes in Mendo. As satellite boxes are replaced with cellular, costs will go down.
CHP Contract for Primary Answering Service		260	720	295	720	CHP costs remain minimal compared to valuable service provided as Primary Answering Point (PAP).
Direct Expenses		-	2,500	-	2,500	CALSAFE
Expenditures Sub-Total		$ 147,419	$ 150,849	86,933	127,390	
Fund Balance		106,766	61,917	127,953	106,563	

Prep'd by M. Villa

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NEPHELE BARRETT, EXECUTIVE DIRECTOR

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August 24, 2026

To **MCOG Board of Directors**
From: Michael Villa, Deputy Director/Fiscal Manager
Subject: Consent Calendar of August 24, 2026

* * * * * * * * * * * *

The following items are recommended for approval/action:

6. Approval of June 1, 2026, Minutes

7. Approval of First Amendment to Fiscal Year 2026/27 Transportation Planning Overall Work Program (OWP)

8. Adoption of Resolution No. M2026-__ Approving the Allocation of FY 2026/27 State of Good Repair Funds to The Ukiah Transit Center Project and the Transfer of FY 2021/22 Funds to a new MTA Safety and Security Repair and Replace Project

   This Resolution programs the FY 26/27 State of Good Repair (SGR) funds to the Ukiah Transit Center project and reallocates the FY 21/22 SGR funds from that project to a new project upgrading the security systems at the Ukiah and Fort Bragg yards. Using the older funds first ensures they are expended before their lapse date.

9. Approval of Title VI Program & Limited English Proficiency Plan Update

   Staff updated the MCOG Title VI Program with the latest Census data. No practices or policies are being modified, because the demographic data showed minimal change from the 2020 version. The Program is required to be re-adopted by the Board and submitted to Caltrans.

MENDOCINO COUNCIL OF GOVERNMENTS
DRAFT MINUTES
Monday, June 1, 2026

Primary Location:
County Administration Center, Board of Supervisors Chambers
Room 1070, 501 Low Gap Road, Ukiah

Teleconference Locations:
525 S. Main St., Ste. B, Ukiah
Fort Bragg City Hall, 416 N. Franklin St., Fort Bragg
Willits City Hall, 111 E. Commercial Street, Willits
Point Arena City Hall, 451 School St., Point Arena
Caltrans District 1, 1656 Union St., Eureka

General Public Teleconference by Zoom

1. **Call to Order and Roll Call.** The meeting was called to order at 1:30 p.m. Directors present: John Haschak, Heather Criss, and Maureen Mulheren in Ukiah; Director Rafanan in Fort Bragg; Tatiana Ahlstrand for Caltrans/PAC in Eureka. Directors absent: Matthew Alaniz and Jeff Hansen. Chair Haschak presiding.

Staff present in Ukiah: Nephele Barrett, Executive Director; Michael Villa, Deputy Director; James Sookne, Program Manager; Julie St. Pierre, Administrative Assistant; and Orion Walker, Energy Program Manager.

Staff present by Zoom: Hector Ortega, Regional Project Analyst.

Guests present by Zoom: Jacob King, Executive Director, Mendocino Transit Authority

2. **Assembly Bill 2449 Notifications and Considerations.** This item is to receive and address requests from Board members to participate in the meeting from a non-posted location, subject to conditions set forth in AB 2449. There were no such requests.

3. **Regional Housing Needs Allocation – Adoption of Methodology & Issuance of Draft Allocation.** Nephele Barrett, Executive Director, reported that the draft methodology was approved by the State Department of Housing and Community Development.

James Sookne, Program Manager, presented the Staff Report, and summarized the process. Initially, MCOG received a determination from HCD for 6,456 units over the next eight years. MCOG attempted to appeal this number but was unsuccessful. After several drafts and meetings with the HCD and the Methodology Committee, the most recently submitted draft methodology was accepted. Mr. Sookne described a disagreement with the HCD regarding the amount of units to be developed in Ukiah. HCD required shifting of units to the City of Ukiah before their approval due to lower average VMT per capita in the City as compared to other areas of the region. This led to questions and discussion from the Board regarding concerns with the units expected in Ukiah as well as potential annexation impacts on the allocation. There was no public comment on this item.

Upon motion by Director Mulheren, second by Director Rafanan, and carried unanimously on roll call vote *(4 Ayes – Rafanan, Mulheren, Criss, and Haschak; 0 Noes; 2 Absent – Alaniz and Hansen)*: IT IS ORDERED that the Resolution No. M2026-08 Regional Housing Needs Allocation Methodology is adopted, and the Draft Allocation is issued.

[Clerk's Note: Director Ahlstrand's name was called on the Roll Call in error for Agenda Items #3 through #5; as a PAC Member, Director Ahlstrand is not eligible to vote on these agenda items, so her vote is not listed in the official vote record.]

4. Acceptance of the FY 2026/27 Northern Rural Energy Network (NREN) Work Plan. Orion Walker, Energy Program Manager, summarized the plan and described the six main program categories: the Home Energy Advisor Program, a residential program focused on educational outreach activities; the Home Energy Upgrade Program, which identifies potential energy efficient home upgrades; the Commercial Energy Services Program, identifies potential larger-scale projects with businesses; the Finance Program, currently focused on implementing a region-wide loan program; Public Services, which involves rebate incentive programs for local municipalities, government buildings, and school districts; and Energy Career Education and Training Program, which organizes activities and trainings for career development. The Work Plan outlines overall tasks for the upcoming fiscal year within these programs. Mr. Walker summarized some upcoming events and trainings, marketing updates, and new staffing updates. Finally, he reported that they were accepted into the Civic Spark Internship Program.

Steve Henderson, a.k.a. Gizmo, provided public comment. He expressed appreciation for Mr. Walker's report.

Upon motion by Director Mulheren, second by Director Criss, and carried unanimously on roll call vote *(4 Ayes – Rafanan, Mulheren, Criss, and Haschak; 0 Noes; 2 Absent – Alaniz and Hansen)*: IT IS ORDERED that the FY 2026/27 Northern Rural Energy Network (NREN) Work Plan is accepted.

5. Convene as SAFE – Service Authority for Freeway Emergencies.

a. <u>Report of Motorist Aid Call Box Program Status.</u> Michael Villa, Deputy Director, reported that SAFE has completed around 80% of the 4G upgrades across the county. SAFE has been working alongside Nightscope to address any technologically complicated upgrades, but the main technician with Nightscope is no longer providing services, and so ongoing technological support is unknown. Staff is working with other SAFEs throughout California to explore options for ongoing maintenance.

b. <u>Adoption of FY 2026/27 Mendocino SAFE Budget.</u> Mr. Villa summarized budget changes, including new installations and upgrades, and a decrease in cost for the cellular and satellite service. Several budget elements could be subject to change depending on the status of Nightscope. Ms. Barrett provided further information on uncertainty with Nightscope across the state of California, and future fund balances. In response to a question from Chair Haschak, Ms. Barrett explained that the fund balance will be available to continue with upgrades and repairs/modifications as well as increases to service costs.

Upon motion by Director Mulheren, second by Director Criss, and carried unanimously on roll call vote *(4 Ayes – Rafanan, Mulheren, Criss, and Haschak; 0 Noes; 2 Absent – Alaniz and Hansen)*: IT IS ORDERED that the FY 2026/27 Mendocino SAFE Budget is approved.

6. Recess as SAFE – Convene as RTPA; Recess as RTPA – Reconvene as Policy Advisory Committee.

7 - 8. Consent Calendar. Upon motion by Director Criss, second by Director Mulheren, and carried unanimously on roll call vote *(5 Ayes – Rafanan, Mulheren, Criss, Ahlstrand/PAC and Haschak; 0 Noes; 2 Absent – Alaniz and Hansen)*: IT IS ORDERED that consent items are approved.

7. **Approval of June 1, 2026, Minutes –** *as written*
8. **Approval of the corrected April 13, 2026, Transit Productivity Committee Minutes –** *as written*

9. Public Expression. Steve Henderson, a.k.a. Gizmo, expressed the importance of using funds from registration fees (for commercial vehicles, in particular) for safer roads and capturing revenue from vehicles registered elsewhere but operating within Mendocino County. He also described air quality concerns about commercial vehicles idling.

10. Adoption of Resolution #M2026-09 Approving Mendocino Transit Authority's SB 125 Long-Term Financial Plan. Mr. Villa described the SB 125 program, which provided about $11 million to the region for transit and required a long-term financial plan for transit operators. He summarized the long-term financial plan, a financial forecast of the transit operator once SB 125 money is no longer being received and described projected shortfalls. Upon acceptance, the plan will be submitted to CalSTA by June 30. Ms. Barrett provided some corrections and recommended that they be incorporated into Board approval—page 5, FY 24/25 ridership should be 172,142 rather than the year-to-date number listed, a year over year increase of 2.5%; on page 9, Senior Center Administration funding is part of reimbursement to MTA; and page 10, systemwide savings should be increased by 5% each year.

Upon motion by Director Mulheren, second by Director Criss, and carried unanimously on roll call vote *(5 Ayes – Rafanan, Mulheren, Criss, Ahlstrand/PAC and Haschak; 0 Noes; 2 Absent – Alaniz and Hansen)*: IT IS ORDERED that the Resolution #M2026-09 Approving the 2026 Mendocino Transit Authority's SB 125 Long-Term Financial Plan is adopted with the recommended changes.

11. Adoption of Resolution #M2026-10 Approving the 2026 Mendocino County Regional Transportation Plan (RTP) & Active Transportation Plan (ATP). Mr. Sookne reported that a few scheduling changes and date changes for completed projects have been made to the plan.

Dave Shpak provided public comment. He expressed concerns about issues not being properly addressed in the plan, particularly the flooding on State Route 1 at the Garcia River and Gasker Slough.

Ms. Barrett provided more information on the Sea Level Rise Study following Mr. Shpak's comments. She explained the problems outlined should be included in the Caltrans Climate Change Vulnerability Assessments. Additionally, Caltrans has received approval for funding to complete further analysis of the issue. She explained that while a specific project is not listed in the RTP since a specific adaptation has not been identified, a need for correction of the problem is included in the Short Range Action Plan of the State Highway Element of the RTP. Finally, she noted that Mr. Sookne has met several times with Mr. Shpak and have considered his concerns and made consequent changes when developing the Plan as appropriate

Ms. Barrett read a portion of a letter Mr. Shpak submitted as part of his public comment. The letter had been submitted to the Board previously and was entered into the record.

Director Mulheren thanked Mr. Shpak and staff.

Upon motion by Director Mulheren, second by Director Criss, and carried unanimously on roll call vote *(5 Ayes – Rafanan, Mulheren, Criss, Ahlstrand/PAC and Haschak; 0 Noes; 2 Absent – Alaniz and Hansen)*: IT IS ORDERED that the Resolution #M2026-10 Approving the 2026 Mendocino County Regional Transportation Plan (RTP) & Active Transportation Plan (ATP) is adopted.

12. Fiscal year 2026/27 RTPA and COG Budget. Mr. Villa summarized the budget process so far, including a few changes that have been made to the document since the May 4 MCOG meeting. The budget package was made available as a separate electronic document along with the agenda packet.

The changes that have been made include an additional unmet need that was recommended as reasonable to meet by the SSTAC and already funded in the budget, an approximate $70,000 increase in amount for the Surface Transportation Block Grant Program, and a finalized SB 125 Formula Transit Program budget.

Additionally, funds for a potential grant from Caltrans were included in the budget. This grant has since been awarded.

It was confirmed that funding and allocations in the budget has been reviewed and recommended by the Executive Committee, Technical Advisory Committee, Transit Productivity Committee, and Social Services Transportation Advisory Council and staff.

Upon motion by Director Criss, second by Director Rafanan, and carried unanimously on roll call vote *(4 Ayes – Rafanan, Mulheren, Criss, and Haschak; 0 Noes; 2 Absent – Alaniz and Hansen)*: IT IS ORDERED that the budget and six allocating resolutions are adopted as recommended by staff and committees:

a. Adoption of Resolution Allocating Fiscal Year 2026/27 Funds and 2025/26 Carryover Funds for Reserves, Administration, Bicycle & Pedestrian Facilities, and Planning

Resolution No. M2026-02

Allocating Fiscal Year 2026/27 Funds and 2025/26 Carryover Funds for Reserves, Administration, Bicycle & Pedestrian Facilities, and Planning

(Reso. #M2026-02 is incorporated herein by reference)

LTF Reserve	639,000	
Local Transportation Fund (LTF)		
MCOG Administration & Other Direct Costs	613,366	
2% Bicycle & Pedestrian	72,913	
Planning Program – new funds	125,000	
Planning Program – carryover	108,194	
Total LTF		1,558,473
Surface Trans. Block Grant Program – Admin.		95,499
ATP Infrastructure Grants & Complete Streets Program – Admin. carryover		471,146
PPM Funds - Planning		154,000
RPA Funds - Planning		409,500
SHA Grant - Planning		265,590

FTA Grant - Planning		188,800
Total Allocations		**3,143,008**

b. Adoption of Resolution Finding That There Are No Unmet Transit Needs That Are Reasonable to Meet for Fiscal Year 2026/27

Resolution No. M2026-03

Finding That There Are No Unmet Transit Needs
That Are Reasonable to Meet
for Fiscal Year 2026/27
(Reso. #M2026-03 is incorporated herein by reference)

c. Adoption of Resolution Allocating Fiscal Year 2026/27 Local Transportation Funds, State Transit Assistance, and Capital Reserve Funds to Mendocino Transit Authority

Resolution No. M2026-04

Allocating Fiscal Year 2026/27 Local Transportation Funds,
State Transit Assistance, and Capital Reserve Funds to
Mendocino Transit Authority
(Reso. #M2026-04 is incorporated herein by reference)

Local Transportation Fund (LTF)		
MTA Operations	2,923,652	
Unmet Transit Needs	0	
Senior Center Operations	641,777	
Total LTF		3,565,429
State Transit Assistance (STA)		
MTA Operations	876,829	
MTA & Senior Center Capital	0	
Capital Reserve Fund	0	
Total STA		876,829
Capital Reserve Program		
Current Year - MTA	0	
Current Year – Senior Centers	0	
Long Term – MTA and Seniors	308,575	
Total Capital Reserve		308,575
Total Transit Allocations		**4,750,833**

d. Adoption of Resolution Allocating Surface Transportation Block Grant Program Funds for Fiscal Year 2026/27 MCOG Partnership Funding Program, Local Assistance, and Distribution By Formula to Member Agencies

Resolution No. M2026-05

Allocating Surface Transportation Block Grant Program Funds
for Fiscal Year 2026/27 MCOG Partnership Funding Program,
Local Assistance, and
Distribution by Formula to Member Agencies
(Reso. #M2026-05 is incorporated herein by reference)

MCOG Partnership Funding Program		100,000
Local Assistance – Project Delivery		90,000
Formula Distribution to Members		
Mendocino County DOT	190,362	
City of Ukiah	256,186	
City of Fort Bragg	171,050	
City of Willits	160,545	
City of Point Arena	106,111	
Total Formula Distributions		884,255
Total STBG Allocations		**1,074,255**

e. Adoption of Resolution Allocating SB 125 Formula-Based Transit & Intercity Rail Capital Program (TIRCP) and Zero Emission Transit Capital Program (ZETCP) Funds for Fiscal Year 2026/27

Resolution No. M2026-06

Allocating SB 125 Formula-Based Transit & Intercity Rail Capital
Program (TIRCP) and Zero Emission Transit Capital Program (ZETCP)
Funds for Fiscal Year 2026/27
(Reso. # M2026-06 is incorporated herein by reference)

MCOG Administration & Management – Year 3	27,659	
Project 1 – MTA Facilities, Vehicle Improvements and Service Expansion	648,043	
Total FY 2026/27 TIRCP and ZETCP Allocations		**675,702**

f. Adoption of Resolution Allocating Fiscal Year 2026/27 Funds for Northern Rural Energy Network Programs

Resolution No. M2026-07
Allocating Fiscal Year 2026/27 Funds for
Northern Rural Energy Network Programs
(Reso. #M2026-07 is incorporated herein by reference)

2026/27 Dow & Associates Staffing Contract	670,401		
2026/27 Other Direct Costs	109,600		
2026/27 Subtotal		780,001	
Total FY 2026/27 NREN Allocation			**780,001**

13. Recess as Policy Advisory Committee – Reconvene as RTPA – Ratify Action of Policy Advisory Committee. Upon motion by Director Mulheren, second by Director Rafanan, and carried unanimously on roll call vote *(5 Ayes – Rafanan, Mulheren, Criss, and Haschak; 0 Noes; 2 Absent – Alaniz and Hansen)*: IT IS ORDERED that the actions taken by the Policy Advisory Committee are ratified by the MCOG Board of Directors.

14. Reports – Information – *No Action*

a. Caltrans District 1 – Projects Update and Information. Director Ahlstrand reminded the Board about a Caltrans Customer Service Request Portal, where topics such as encampments, graffiti, fire hazards, litter and potholes can be reported. csr.dot.ca.gov

Director Ahlstrand provided updates on several projects and grants. The Ukiah Rehabilitation Project is underway on US 101 through Ukiah, north of Robinson Creek, to Pomo Lane undercrossing. This includes upgrading guardrails, lighting and TMS facilities. The Gualala Downtown Streetscape Project will be going to the California Transportation Commission for allocation in August. The Ridgewood Class 1 Pavement Project on US 101 near Willits is anticipated to start work and will be completed in November. A few other projects will begin work soon, including the Covelo Pavement Project along State Route 162 from the intersection of US 101 to Covelo, the Eel River Bridge Replacement Project on State Route 162, and the Albion River Bride Project. An updated Quarterly Milestone Report will be shared in the following weeks. An award meeting will be scheduled with MCOG and the City of Willits to discuss next steps after the Sustainable Planning Transportation Grant was awarded (aforementioned by Mr. Villa). Finally, the Caltrans District 1 Transportation Planning Open House will be held in Ukiah at the Office of Education on July 15.

Chair Haschak inquired about Clean California funding.

b. Mendocino Transit Authority. Jacob King, Executive Director, reported that the MTA has applied for Cycle 8 of the Transit and Intercity Rail Capital Program (TIRCP) funding to fund the transit center, the mixed-use transit center and the senior housing project in Ukiah. Award announcement takes place in September.

c. Great Redwood Trail Agency. Chair Haschak reported that a contract for a consultant to form a Tribal Advisory Committee was approved.

d. MCOG Staff - Summary of Meetings. Ms. Barrett referred to the written report.

e. MCOG Administration Staff
   i. *Miscellaneous*. Ms. Barrett expressed appreciation for staff—Mr. Ortega, Mr. Villa, Mr. Sookne, and Mr. Walker—for their hard work reflected in this meeting.
   ii. *Next Meeting Date.* Monday, August 24, 2026.

f. MCOG Planning Staff
   i. *Work Element 5 – Mendocino County Sea Level Rise Roadway Impact Study*. Hector Ortega, Regional Project Analyst, reported that there were no significant updates since the last report, but MCOG continues to work with the consultant team on the project.

   ii. *Work Element 11 – Pavement Management Program (PMP) Update.* Mr. Ortega reported that field data collection activities concluded in May. Preliminary PCI scores for the City of Fort Bragg and the City of Willits will be available at the next project status meeting, along with discussion on a walking survey training.

   iii. Work Element 8 – Vehicle Miles Traveled (VMT) Regional Mitigation Study. Mr. Ortega reported that proposals have been received and a Consultant Selection Committee has been formed to evaluate submissions, with selection to come in the following weeks.

   iv. Miscellaneous.

g. Northern Rural Energy Network (NREN) Staff. The update was provided as part of Agenda Item #4.

h. MCOG Directors. Chair Haschak reported that the Board of Supervisors will discuss sales tax for road improvements in July.

i. California Association of Councils of Governments (CALCOG) Delegates. None.

15. Adjournment. The meeting was adjourned at 2:54 p.m.

Submitted: NEPHELE BARRETT, EXECUTIVE DIRECTOR

*MENDOCINO COUNCIL OF GOVERNMENTS

STAFF REPORT

TITLE: First Amendment to FY 2026/27 Overall Work Program **DATE PREPARED:** 8/18/26

SUBMITTED BY: Alexis Pedrotti, Project Manager **MEETING DATE:** 8/24/26

BACKGROUND:

The Final FY 2026/27 Overall Work Program *(totaling $1,251,084)* was adopted by MCOG on May 4, 2026. Now that the FY 2025/26 books have closed, we need to carry over and reprogram some unexpended planning funds, some of which expire 6/30/27. Included in this amendment are Rural Planning Assistance (RPA) Funds, Planning, Programming and Monitoring (PPM) Funds, Local Transportation Funds (LTF) and State Planning Grant Funding. Unexpended RPA funds have been included in this proposed amendment but will not become official until RPA fund balances are certified by Caltrans.

Additionally, included in this amendment, is the recently awarded Caltrans Sustainable Transportation Planning Grant to complete the SR 20 Willits Multimodal Circulation and Intersection Improvement Study. As part of Caltrans' conditional award requirements to receive these grant funds, MCOG is required to amend them into the Overall Work Program.

Further First Amendment details are as follows:

W.E.1 (MCOG) Regional Government & Intergovernmental Coordination– MCOG Staff had a remaining balance of $13,375 of Planning, Programming & Monitoring (PPM) funding at the close of FY 2025/26. These carryover funds have been carried over and added to this work element.

W.E.2 (MCOG) Planning Management & General Coordination (Non-RPA) – MCOG Staff had a remaining balance of $64,214 of LTF funding at the close of FY 2025/26. These carryover funds have been carried over and added to this work element, along with $9,749 of LTF carryover for direct costs that weren't fully expended in FY 2025/26.

W.E.5 (MCOG) Mendo Co. Sea Level Rise Roadway Impact Study (Carryover) – This project is a multi-year project that was initiated in FY 2024/25 and has been carried over to be finalized in FY 2026/27. A total of $206,249 ($182,592 – Grant Funding + $23,657 – LTF) has been carried over in the First Amendment.

W.E. 7 (MCOG) Planning, Programming & Monitoring – MCOG Planning Staff had an additional $18,140 of Planning, Programming and Monitoring (PPM) funds remaining in this element, these funds have been identified, increasing the total to $143,140.

W.E.8 (MCOG) Mendo Co. Regional Vehicle Miles Traveled (VMT) Mitigation Program (Carryover) – This project is a multi-year project that was initiated in FY 2025/26 and has been carried over to continue working on the project through FY 2026/27. A total of $309,369 ($273,884 in Grant Funding and $35,485 in LTF) has been identified as actual carryover in the First Amendment.

W.E.10 (MCOG) SR 20 Willits Multimodal Circulation and Intersection Improvement Study (NEW) – MCOG was successful in receiving this Sustainable Transportation Planning - Sustainable Communities Competitive Strategic Partnership (FTA 5304) Planning Grant award at the end of July 2026. MCOG received $188,800 of grant funding. This project is a multi-year project and is being added to this Overall Work Program and is expected to begin in September 2026. This grant program requires a local match requirement totaling $47,200 of Local Transportation Funds.

W.E. 11 (MCOG) Pavement Management Program Update – A total of $65,735 ($44,750 LTF and $20,985 PPM) in carryover funding has been carried over and added to this work element for the consultant to finalize the project in the first quarter of FY 2026/27.

W.E. 13 (FORT BRAGG) Stormwater Program Asset Management Plan – A total of $67,066 in PPM carryover funding has been carried over and added to this work element for the City of Fort Bragg to finalize the project in FY 2026/27. No new funding was added to this element, only carryover funds have been identified.

W.E. 14 (MCOG) Training – A total of $25,011 in LTF carryover funding has been carried over and added to this work element to be utilized in the upcoming FY 2026/27.

W.E.16 (MCOG) Multi-Modal Transportation Planning – MCOG Staff had a remaining balance of $4,253 in RPA funding at the close of FY 2025/26. The estimated carryover amount was $5,000; however, actual funding was slightly lower. This adjustment has been reflected in the work element.

W.E.18 (MCOG) Geographic Information System (GIS) Activities – MCOG Staff had a remaining balance of $2,048 of Rural Planning Assistance (RPA) funding at the close of FY 2025/26. These carryover funds have been carried over and added to this work element.

W.E. 20 (MCOG) Grant Development & Assistance– MCOG Staff had a remaining balance of $21,481 ($1,481 RPA and $20,000 LTF) in carryover funding at the close of FY 2025/26. These carryover funds have been carried over and added to this work element.

As a reminder, some *estimated* carryover amounts were included with the Final Overall Work Program, now the First Amendment adjusts the carryover to reflect actuals. This proposed amendment would increase the FY 2026/27 Overall Work Program total from $1,251,084 to $1,717,774. Details are shown in **bold** and ~~strike-out~~ on the attached Amended Overall Work Program Financial Spreadsheet. *Hard copies of the full amendment will be available upon request.*

ACTION REQUIRED: Consider approval of First Amendment to FY 2026/27 Overall Work Program.

ALTERNATIVES: (1) Approve Amendment *(Recommended);* (2) Do not approve Amendment; or (3) Refer Amendment to TAC for review and recommendation.

RECOMMENDATION: Accept Technical Advisory Committee's recommendation to approve the First Amendment to FY 2026/27 Overall Work Program (OWP) and authorize Executive Director to sign appropriate certifications and revised OWP Agreement (as needed), and forward to Caltrans as required.

/ajp
Attachment: FY 2026/27 Overall Work Program Financial Spreadsheet

FY 2026/27 (~~FINAL~~ AMENDED) OVERALL WORK PROGRAM

SUMMARY OF FUNDING SOURCES

NO.	WORK ELEMENT	LOCAL LTF	STATE PPM	STATE RPA	OTHER / GRANT	TOTAL
1	**MCOG - Regional Government & Intergovernmental Coordination**	$ -	$ -	$ 170,000	$ -	~~$ 170,000~~
			$ 13,375			**$ 183,375**
2	**MCOG - Planning Management & General Coordination (Non-RPA)**	~~$ 54,000~~	$ 29,000	$ -	$ -	~~$ 83,000~~
		$ 127,963				**$ 156,963**
4	MCOG - Sustainable Transportation Planning	$ -	$ -	$ 11,500	$ -	$ 11,500
5	**MCOG - Mendo Co. Sea Level Rise Roadway Impact Study - *C/O***	~~**$ 11,470**~~	**$ -**	**$ -**	~~**$ 88,530**~~	~~**$ 100,000**~~
		$ 23,657			**$ 182,592**	**$ 206,249**
6	Co. DOT - Combined Special Studies	$ -	$ -	$ 56,000	$ -	$ 56,000
7	**MCOG - Planning, Programming & Monitoring**	**$ -**	~~**$ 125,000**~~	$ 19,500	**$ -**	~~$ 144,500~~
			$ 143,140			**$ 162,640**
8	**MCOG - Regional Vehicle Miles Traveled (VMT) Mitigation Program -C/O**	~~**$ 22,940**~~	**$ -**	**$ -**	~~**$ 177,060**~~	~~**$ 200,000**~~
		$ 35,485			**$ 273,884**	**$ 309,369**
10	**MCOG - SR 20 Willits Multimodal Circ. & Intersection Improvement Study (NEW)**	***$ 47,200***	***$ -***	***$ -***	***$ 188,800***	***$ 236,000***
11	**MCOG - Pavement Management Program Update - *C/O***	~~**$ 35,000**~~	**$ -**	**$ -**	**$ -**	~~**$ 35,000**~~
		$ 44,750	**$ 20,985**			**$ 65,735**
13	**Fort Bragg - Stormwater Program Asset Management Plan - C/O**	**$ -**	**$ 67,066**	**$ -**	**$ -**	**$ 67,066**
14	**MCOG - Training**	~~$ 5,000~~	$ -	$ -	$ -	~~$ 5,000~~
		$ 30,011				**$ 30,011**
15	MCOG - Transportation Information Outreach & Public Participation	$ -	$ -	$ 15,000	$ -	$ 15,000
16	**MCOG - Multi-Modal Transportation Planning**	**$ -**	**$ -**	~~$ 70,000~~	**$ -**	~~$ 70,000~~
				$ 69,253		**$ 69,253**
18	**MCOG - Geographic Information System (GIS) Activities**	$ -	$ -	~~$ 7,500~~	$ -	~~$ 7,500~~
				$ 9,548		**$ 9,548**
20	**MCOG - Grant Development & Assistance**		$ -	~~$ 60,000~~	$ -	~~$ 60,000~~
		$ 20,000		**$ 61,481**		**$ 81,481**
	PROJECT RESERVE	$ 57,584	$ -	*$ -*	*$ -*	$ 57,584
	TOTAL	~~$ 233,194~~	~~$ 154,000~~	~~$ 409,500~~	~~$ 454,390~~	~~$ 1,251,084~~
		$ 386,650	**$ 273,566**	**$ 412,282**	**$ 645,276**	**$ 1,717,774**

TOTAL WORK PROGRAM SUMMARY/PROGRAM MATCH				
			Local LTF 2026/27-*est.* 3% Alloc.	$125,000
Local	~~$233,194~~	~~19%~~	Local LTF *Carryover*	~~$108,194~~
	$386,650	23%		**$261,650**
State	~~**$829,090**~~	~~66%~~	State PPM 2026/27 Alloc.	$129,000
	$1,142,324	67%	State PPM *Carryover*	~~$25,000~~
Federal	**$188,800**	11%		**$144,566**
			State RPA 2026/27 Alloc.	$404,500
TOTAL WORK PROGRAM SUMMARY	~~$1,251,084~~	85%	State RPA *Carryover*	~~$5,000~~
	$1,717,774	**100%**		**$7,782**
			State Grant (Climate Adaptation)	**$182,592**
			State Grant (Technical)	**$273,884**
			Federal Grant (Partnership)	$188,800
			TOTAL	**$1,717,774**

MENDOCINO COUNCIL OF GOVERNMENTS

STAFF REPORT

TITLE: Resolution Allocating FY 2026/27 State of Good Repair Funds to the Ukiah Transit Center Project and Transferring FY 2021/22 Funds to the New Mendocino Transit Authority Safety and Security Repair and Replace Project

SUBMITTED BY: Michael Villa, Deputy Director/Fiscal Manager DATE: 8/12/2026

BACKGROUND:

The State of Good Repair (SGR) program is a transit capital funding program created by the Road Repair and Accountability Act of 2017, also known as Senate Bill 1 (SB 1). This funding source is derived from a fee on vehicle registrations. SGR is a capital program and cannot be used for operations or project development as a stand-alone project. Eligible uses of SGR funds include:

- Transit capital projects to maintain, repair or modernize a transit operator's existing transit fleet or facilities,
- Design, acquisition, and construction of new vehicles or facilities that improve existing transit services, and
- Services that complement local efforts for repair and improvement of local transportation infrastructure.

Updated SGR Guidelines were approved in July 2022, posted at State of Good Repair | Caltrans along with related program information. Transit operators submit project lists directly to Caltrans in the CALSMART online reporting tool. Projects must be approved by Regional Transportation Planning Agencies. Mendocino Transit Authority (MTA) has annually submitted its SGR Project Lists as required.

The State Controller distributes the funds by the same formula as for State Transit Assistance. Allocated revenues have been received by MCOG at approximately $129,000 to $167,000 per year. The SGR revenues are received quarterly in MCOG's fund account. Up to four years of funding can be accrued for a project. Once the project is started, four years are allowed for expenditure, allowing up to a total of eight years from the allocation year to expend the funds.

MCOG has allocated SGR funds for Fiscal Years 2017/18 through 2025/26. To date, the funds have been allocated for replacement fleet vehicles, the Ukiah Transit Center project, emergency roof repair, and the Emergency Replacement HVAC Unit project. For FY 2026/27, MCOG staff proposes to allocate the annual SGR apportionment to the Ukiah Transit Center project (CalSMART ID 2019-6241-002), with the understanding that these funds may later be redirected to a vehicle replacement project should federal funding become available for that purpose (MTA has applied for a grant where SGR could be used for the required funding match). MTA's FY 2026/27 SGR Project List Submittal also proposes a new Safety and Security Repair and Replace project (CalSMART ID SGR-C22-FY26/27-6241-001), which will update security systems for their Ukiah and Fort Bragg yards.

MCOG had an audited SGR fund balance of $481,559 as of June 30, 2025. Remaining unexpended FY 2021/22 SGR funds in the amount of $3,724 (PUC Section 99313) and $9,822.52 (PUC Sec. 99314) are currently allocated to the Ukiah Transit Center project. Staff recommends transferring these FY 2021/22 funds, totaling $13,546.52, to the newly proposed MTA Safety and Security Repair and Replace project, as first identified on MTA's FY 2026/27 SGR Project List Submittal.

ACTION REQUIRED:

By resolution, approve the allocation of FY 2026/27 State of Good Repair funds to the Ukiah Transit Center project (CalSMART ID 2019-6241-002), and approve the transfer of $3,724 (Fund 99313) and

$9,822.52 (Fund 99314) in FY 2021/22 State of Good Repair funds from the Ukiah Transit Center project to the newly proposed MTA Safety and Security Repair and Replace project (CalSMART ID SGR-C22-FY26/27-6241-001).

ALTERNATIVES:

The Council could reject the proposed fund allocation and transfer or request revisions. – *not recommended*

RECOMMENDATION:

Adopt the resolution approving the allocation of FY 2026/27 State of Good Repair funds to the Ukiah Transit Center project and approving the transfer of FY 2021/22 State of Good Repair funds from the Ukiah Transit Center project to the new MTA Safety and Security Repair and Replace project, and direct staff to submit the resolution to Caltrans as required.

MENDOCINO COUNCIL OF GOVERNMENTS

BOARD of DIRECTORS

RESOLUTION No. M2026-___

APPROVING THE ALLOCATION OF FY 2026/27 STATE OF GOOD REPAIR FUNDS TO THE UKIAH TRANSIT CENTER PROJECT AND THE TRANSFER OF FY 2021/22 FUNDS TO A NEW MTA SAFETY AND SECURITY REPAIR AND REPLACE PROJECT

WHEREAS,

- The Mendocino Council of Governments (MCOG) is the designated Regional Transportation Planning Agency for Mendocino County;
- Senate Bill l (SB 1), the Road Repair & Accountability Act of 2017, established the State of Good Repair (SGR) program to fund eligible transit maintenance, rehabilitation and capital project activities that maintain the public transit system in a state of good repair;
- MCOG is an eligible project sponsor that receives and distributes State Transit Assistance and State of Good Repair funds to eligible project sponsors (local agencies) for eligible transit capital projects;
- Mendocino Transit Authority, as an eligible sub-recipient, previously submitted a Fiscal Year 2018/19 through 2021/22 Project List for State of Good Repair Program funds, approved by MCOG on June 3, 2024;
- MTA's FY 2026/27 SGR Project List Submittal proposes a new Safety and Security Repair and Replace project (CalSMART ID SGR-C22-FY26/27-6241-001), and for FY 2026/27 MCOG staff proposes to allocate the annual State of Good Repair apportionment to the Ukiah Transit Center project (CalSMART ID 2019-6241-002); and
- Remaining unexpended FY 2021/22 State of Good Repair funds in the amount of $3,724 (PUC Section 99313) and $9,822.52 (PUC Section 99314), currently allocated to the Ukiah Transit Center project (CalSMART ID 2019-6241-002), are proposed to be transferred to the new MTA Safety and Security Repair and Replace project (CalSMART ID SGR-C22-FY26/27-6241-001); and
- MCOG concurs with the proposed allocation of FY 2026/27 State of Good Repair funds to the Ukiah Transit Center project and the proposed transfer of FY 2021/22 State of Good Repair funds to the new MTA Safety and Security Repair and Replace project; therefore, be it

RESOLVED, THAT:

- The Mendocino Council of Governments approves the allocation of FY 2026/27 State of Good Repair funds to the Ukiah Transit Center project and the transfer of FY 2021/22 State of Good Repair funds to the new MTA Safety and Security Repair and Replace project, and finds that the fund recipient agrees to comply with all conditions and requirements set forth in the Certification and Assurances document and applicable statutes, regulations and guidelines for all State of Good Repair funded transit capital projects.

ADOPTION OF THIS RESOLUTION was moved by Director ______________, seconded by Director

__________, and approved on this 24th day of TBD, 2026, by the following roll call vote:

AYES:
NOES:
ABSTAINING:
ABSENT:

WHEREUPON, the Chairman declared the resolution adopted, AND SO ORDERED.

______________________________	______________________________
ATTEST: Nephele Barrett, Executive Director	ATTEST: John Haschak, Chair

MENDOCINO COUNCIL OF GOVERNMENTS

STAFF REPORT

TITLE: Title VI Program Update

DATE PREPARED: 8/12/26
MEETING DATE: 8/24/26

SUBMITTED BY: James Sookne

BACKGROUND: All programs receiving financial assistance from the Federal Transit Administration (FTA) are subject to Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and the Department of Transportation's (DOT) implementing regulations. Title VI prohibits discrimination by recipients of Federal financial assistance on the basis of race, color, and national origin, including the denial of meaningful access for limited English proficient (LEP) persons. Section 601 of Title VI of the Civil Rights Acts on 1964 states the following:

> "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

The term "program or activity" means all of the operations of a department, agency, special purpose district, or government; or the entity of such State or local government that distributes such assistance and each such department or agency to which the assistance is extended, in the case of assistance to a State or local government.

Since the Mendocino Council of Governments distributes FTA funds to the Mendocino Transit Authority, MCOG is required to comply with Title VI and DOT's regulations. FTA requires that all direct and primary recipients document their compliance with DOT's Title VI regulations by submitting a Title VI Program to their FTA regional civil rights officer once every three years or as otherwise directed by FTA. For all recipients (including sub-recipients), the Title VI Program must be approved by the recipient's board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA. Sub-recipients (MCOG) shall submit Title VI Programs to the primary recipient (Caltrans) from whom they receive funding in order to assist the primary recipient in its compliance efforts.

The MCOG Title VI Program was originally adopted by the Board on August 18, 2014, and updated on December 4, 2017, and December 7, 2020. Staff has reviewed and incorporated the most current Census data into the attached updated 2026 MCOG Title VI Program. The difference in data between the 2020 and the 2026 Programs is trivial and doesn't require MCOG to change any practices or policies.

Staff will be prepared to discuss this topic further at the meeting.

ACTION REQUIRED: Approval of the updated Title VI Program.

ALTERNATIVES: The Board may choose not to approve the updated Title VI Program.

RECOMMENDATION: Staff recommends the Board approves the updated Title VI Program.

MENDOCINO COUNCIL OF GOVERNMENTS

BOARD of DIRECTORS

RESOLUTION No. M2026-___

APPROVE THE UPDATED TITLE VI PROGRAM AND ASSOCIATED LIMITED ENGLISH PROFICIENCY PLAN; AUTHORIZE THE EXECUTIVE DIRECTOR TO EXECUTE SAID POLICY ON BEHALF OF THE MENDOCINO COUNCIL OF GOVERNMENTS AND APPOINT A TITLE VI COORDINATOR

WHEREAS,

- The Mendocino Council of Governments (MCOG) is the designated Regional Transportation Planning Agency for Mendocino County; and
- As the recipient of Federal Transit Administrative (FTA) funding, MCOG must establish and maintain a Title VI program, including a Limited English Proficiency Plan, pursuant to Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987; and
- To ensure patrons of MCOG are protected from civil rights violations, MCOG established a Title VI program in 2014 and updated the program in 2017 and 2020; and
- MCOG desires to update the Title VI program to continue ensuring patrons of MCOG are protected from civil rights violations; therefore, be it

RESOLVED, THAT:

1. Mendocino Council of Governments approves the updated Title VI Program and associated Limited English Proficiency Plan.
2. Mendocino Council of Governments authorizes the Executive Director to execute the Title VI Program and associated Limited English Proficiency Plan and appoint a Title VI Coordinator.

ADOPTION OF THIS RESOLUTION was moved by Director ______________, seconded by Director ___________, and approved on this 24th day of August 2026, by the following roll call vote:

AYES:
NOES:
ABSTAINING:
ABSENT:

WHEREUPON, the Chairman declared the resolution adopted, AND SO ORDERED.

ATTEST: Nephele Barrett, Executive Director

ATTEST: John Haschak, Chairman

08/05/2026 2:19 AM

Re: Testimony Regarding Redwood Coast Senior Bus and Service Issues for Disabled Individuals and Seniors

To info <info@mendocinocog.org>

Good day,

The senior bus has two good buses running on Mon, Wed & Fri. The old bus is used on Tues and Thurs. Three days are better than none.

Thank you

On Tue, Jun 30, 2026, 11:25 AM info <info@mendocinocog.org> wrote:

> Good Morning,
>
> Thank you for emailing your testimony. Your comments will be distributed to the Directors ahead of the next MCOG Board meeting scheduled for Monday, August 24, 2026, as well as being entered into the record during the Public Expression item on the meeting's agenda.
>
> Sincerely,
>
> Julie St. Pierre
>
>> On 06/28/2026 4:42 AM EDT XXXXXXXXXXXXX wrote:
>>
>> Dear MCOG Board,
>>
>> My name is XXXXXXXXXX. I am submitting testimony regarding service issues with the Redwood Coast Senior Bus. I have used this service for years. I am disabled due to injuries I sustained after hitting an elk while driving 55 mph, which caused my vehicle to roll three times.
>>
>> The drivers are assigned specific buses. There are three buses and only two drivers at the time. Paul is assigned the oldest bus which feels like it has no suspension. During a the ride, I was bounced up and down so much and had to hold onto the seat in front of me to keep myself steady. I told the driver that the ride had aggravated my back and that I would need to see my chiropractor, which I later did.
>>
>> I spoke with two dispatchers think names are Rose, Jessica and also Director Jill. I asked why isn't he driving one of the two better buses. I have no problems in them. They said they couldn't tell me. I told them I believed they should take these concerns seriously because the condition of the bus could expose the organization to liability if someone were injured. Several seniors, not knowing my situation, approached me independently to express similar concerns. They told me they had previous injuries and that riding on that bus was extremely painful.
>>
>> The first solution the Senior Center gave me was use Dial-A-Ride. However, Dial-A-Ride is short a driver, costs more, and is difficult to schedule, even when calling two days in advance. I also cannot wait more than an hour for transportation home. Because of my back injuries from my accident, I live with severe chronic pain.
>>
>> I was then told that my family should provide transportation. They would if they could but they older and don't want to drive anywhere. At that particular time my aunt was critically ill in the hospital for over a month almost dying and my father almost died too, they don't want to be drive anywhere.

Aifter trying to resolve the issue with them a few times I contacted the MTA employee who handles disability cards. She attempted to help me. I thought we finally had it resolved I can request a bus but they said they can't guarantee it. I tried twice and they sent the bad bus. I declined. They know I'll decline. As a result, the service effectively has become unavailable to me.

This situation creates hardship for seniors, disabled riders, and people without another means of transportation. It makes it more difficult to attend medical appointments, shop for necessities, and reach other important destinations.

This has been I think extra hard for me because I was born and raised in this community. My grandmother rode horses through downtown, and our family has two local street courts named after us. I have attended lunches at the senior center with my family for my whole life, and we have also held celebrations of life there. I was getting along with everyone. It has always been a great place.

I am not someone who seeks conflict, but this experience has been deeply distressing and has affected me for months. It has been one of the most difficult customer service experiences I have ever had.

I also have autism and ADHD. After repeatedly experiencing these issues, I became overwhelmed and had serious meltdowns. I became very upset, used inappropriate language, and then immediately broke down crying. I apologized right away and explained that the situation had become traumatic for me. So Jill told me I will be banned if it happens again.

Thank you for your time and consideration.

Sincerely,

XXXXXXXXXXXX
Fort Bragg, CA

MENDOCINO COUNCIL OF GOVERNMENTS

STAFF REPORT

TITLE: Funding Request for Covelo SR 162 Corridor Multi-Purpose Trail
SUBMITTED BY: James Sookne

DATE PREPARED: 8/12/26
MEETING DATE: 8/24/26

BACKGROUND:
The Covelo SR 162 Corridor Multi-Purpose Trail Project is a Class I multi-purpose trail parallel to State Route (SR) 162, a distance of approximately 1.5 miles through the community of Covelo, from East Lane to Hurt Road. There is also an east-west portion of the trail, approximately 0.5 mile in length, connecting SR 162 to Henderson Lane. Construction began in 2023 and is in the final stretch, with completion anticipated by the end of September 2026. This project is funded through a combination of Active Transportation Program (ATP) grants received in Cycle 1 and 2 of the program, Caltrans Complete Streets funds, and Surface Transportation Block Grant (STBG) Program (formerly known as Regional Surface Transportation Program or RSTP) funds. As a planning agency, implementing a construction project isn't something MCOG usually does. However, at the time that the ATP grant funds were awarded, MCOG was the only eligible applicant willing to take on the project and felt it was appropriate given the number of fatalities along the corridor. Additional background information on the project can be found here: https://www.mendocinocog.org/covelo-sr-162-corridor-multi-purpose-trail.

In 2014, based on a Technical Advisory Committee (TAC) recommendation, the MCOG Board approved $250,000 in STBG/RSTP Partnership Program funding for the project. Of the $250,000, $97,000 was used as local match for various phases for the ATP grants to make them more competitive. In 2019, the Board allocated $200,000 to cover cost increases due to additional design requirements resulting from the environmental work and plant propagation required for the environmental mitigation work. In 2022, the Board approved $61,870 of STBG/RSTP funds to account for additional right-of-way work required by Caltrans and the BIA. In 2025, the Board approved an additional $215,000 to cover unforeseen construction costs resulting from multiple delays, bringing the total amount of local funds allocated towards the project to $726,870.

In the fall of 2025, the pedestrian bridge over Mill Creek, the last major component, was installed, completing the 1.5-mile-long trail adjacent to SR 162. All that remains to be done is striping, installation of bollards and some fence repair work; after which construction will be complete. The budget that had been originally allocated for these activities was shifted to the installation of the pedestrian bridge over Mill Creek due to unexpected cost overruns. Over the winter, additional funding was shifted from the Construction Management (CM) contract to cover some force account work related to the installation of the bridge. Additionally, following construction, there will be additional monitoring and reporting work associated with various permit requirements. MCOG has been working with Caltrans to hand this work over to them since they will be responsible for and maintain the trail on non-tribal lands. Unfortunately, project funding has been fully expended, resulting in a shortfall of approximately $94,500 to complete the remaining work.

This will be brought before the TAC at their meeting on August 19, where staff is seeking a recommendation to allocate an additional $50,000 in STBG Partnership Program funding to partially cover these costs. The current balance of available STBG Partnership Funding is approximately $670,000. Each year, $100,000 is added to the fund balance from the region's Surface Transportation Block Grant Program funding. This total would cover the remaining construction work needed to get this project across the finish line and a portion of the funding that was shifted from the CM contract.

In order to cover the balance of the project costs, including mitigation and the CM work, staff recommends approving an allocation of $50,000 from the administrative Local Assistance Carryover funds (also STBG). The estimated amount needed for these remaining tasks is $44,500. Staff is requesting approval of up to $50,000. This funding may be utilized based on the Executive Director's recommendation, so it was not included in the TAC recommendation.

Staff will be available at the meeting to answer any questions.

ACTION REQUIRED: Approve the TAC's recommendation to allocate an additional $50,000 of STBG Partnership Program funds, and approve staff's recommendation to approve up to $50,000 in administrative Local Assistance Carryover funding to cover the project construction shortfall and for continued mitigation and monitoring work for the Covelo SR 162 Corridor Multi-Purpose Trail.

ALTERNATIVES: Do not approve the TAC's recommendation to allocate additional funds to the project, leaving the project incomplete, or modify the funding approval.

RECOMMENDATION: Approve the TAC's recommendation to allocate an additional $50,000 of STBG Partnership funds to the Covelo SR 162 Corridor Multi-Purpose Trail, allowing for construction to be completed; approve the Executive Director's recommendation that up to $50,000 in administrative Local Assistance Carryover funding be allocated for the remaining construction funding shortfall and continued mitigation and monitoring work on the project.

Agenda # 12.
Regular Calendar
MCOG Meeting
8/24/2026

MENDOCINO COUNCIL OF GOVERNMENTS

STAFF REPORT

TITLE: Carbon Reduction Program (CRP) Funding Approval
SUBMITTED BY: James Sookne

DATE PREPARED: 8/13/26
MEETING DATE: 8/24/26

BACKGROUND:

The Carbon Reduction Program (CRP) is a federal funding source provided by the Federal Highway Administration (FHWA) available for award by the RTPA. The purpose of the CRP is to reduce transportation emissions through the development of State carbon reduction strategies and by funding projects designed to reduce transportation emissions. The MCOG Board previously approved a Project Selection Strategy that will be used as the basis for all CRP project selections. This strategy should reflect the Three Pillars of the State's Carbon Reduction Strategy (CRS) plan, which are: rail and transit, active transportation, and zero-emission infrastructure. CRP funds can be combined with other eligible USDOT funds that support the reduction of transportation emissions.

The total apportionment for the Mendocino County region for Federal Fiscal Years (FFYs) 2022 – 2026 is $828,037.64. In April 2025, the MCOG Board approved the TAC's recommendation in the table below to program the first two FFYs of funding, totaling $325,646, leaving a balance of $502,391.64.

		CRP Funds				
Agency	Project	FFY 2022	FFY 2023	CRP Total	Local Match	Project Total
MTA	Hydrogen Feasibility Study	$161,211	$ 88,789	$250,000	$ 32,391	$ 282,391
Fort Bragg	EV Chargers at CV Starr	$ -	$ 75,646	$ 75,646	$ 9,801	$ 85,447

Due to recent concerns that unobligated funds may be rescinded at the federal level, MCOG would like to program the remaining CRP funds before the end of the current federal fiscal year. Due to time constraints, staff took this to the TAC in July for discussion and recommendation after notifying local agencies of funding availability and the need to take quick action.

Staff presented the following options to begin the discussion: (1) add the remaining funds to the PS&E phase of Fort Bragg's project, then do a cost adjustment in the future to shift funds to the CON phase; or (2) the program the funds to a new project. Since these are federal funds, if they were to go towards a new project, they'd most likely need to go to the PS&E phase due to time constraints, unless the NEPA and/or Right-of-Way requirements have been met. In addition to these two options, the TAC also discussed allocating the funds to the County's North State Street project, which currently has a design shortfall of approximately $900,000, and MTA's need to replace their aging Dial-A-Ride fleet. After reviewing the three primary CRP eligibility categories, the TAC concluded that the North State Street project may not be eligible but purchasing electric buses is an eligible expense and can be delivered quicker than a construction project.

Following discussions, the TAC unanimously approved a recommendation to allocate $221,000 in CRP funds to MTA for the purchase of two electric vehicles, with the balance being allocated to Fort Bragg's existing project contingent on confirmation that Fort Bragg could use the funds.

Following the TAC meeting, MCOG staff received confirmation from City staff that they could use that funding amount on their existing project. In order to meet the FFY deadline, staff submitted the projects recommended by the TAC to Caltrans for the federal programming and obligation process prior to this Board meeting. Although this varies somewhat from MCOG's approved CRP process, the alternative would have meant that the funds wouldn't have been programmed until the next federal fiscal year.

At this time, staff is seeking approval of the TAC's recommendation. Alternatively, the Board could direct staff to de-program the CRP funds and do a formal call for projects, although that is not recommended due to the risk of rescission.

ACTION REQUIRED: Approve the TAC's recommendation to allocate the CRP funds.

ALTERNATIVES: The Board may alternatively choose to (1) not approve the TAC's recommendation, and direct staff to de-program the funds and issue a formal call for projects (not recommended); or (2) approve a modified award of CRP funds to one or both of the identified projects.

RECOMMENDATION: Approve the TAC's recommendation to award a total of $502,391 in Carbon Reduction Program funds, with $221,000 awarded to MTA for the purchase of two electric vehicles and $281,391 to Fort Bragg's existing EV Chargers at CV Starr Center project.

MENDOCINO COUNCIL OF GOVERNMENTS

STAFF REPORT

TITLE: Summary of Meetings DATE PREPARED: 8/13/2026

SUBMITTED BY: Julie St. Pierre, Administrative Assistant MEETING DATE: 8/24/2026

BACKGROUND: Since our last regular MCOG meeting packet, MCOG Administration and Planning staff have attended (or will have attended) the following meetings on behalf of MCOG:

Date	Meeting/Event	Staff
May 27; June 10, 24; July 22; August 5, 19	Mendocino Council of Governments (MCOG) x Redwood Coast Energy Authority (RCEA) Data Check-in	Barrett, Walker & Felice
June 1	MCOG Board Meeting	Barrett, Orth, Villa, Pedrotti, Sookne, Ortega, Walker & St. Pierre
June 2, 16, 30; July 14, 28; August 5, 11	MCOG x Northern Rural Energy Network (NREN) Marketing Meeting	Barrett, Walker, Felice & Hernandez
June 2, 30; July 28; August 11	MCOG NREN Admin Check-in	Barrett, Walker, Felice & St. Pierre
June 3	MCOG x Sierra Business Council (SBC) Marketing Check-in	Walker, Felice & Hernandez
June 3; July 1	NREN Marketing Sub-committee	Walker & Felice
June 3, 16, 30; July 7, 14, 21, 28; August 4, 11, 18	NREN Programs/Admin Sync-up Meeting	Barrett, Walker, Felice & Hernandez
June 4	NREN Mendo-Lake Assessment Discussion	Walker & Felice
June 5, 6, 7	NREN Outreach at the Redwood Empire Spring Fair	Felice, Ortega & Walker
June 8	Statewide Call Box Meeting	Davey-Bates, Pedrotti, Villa & Ortega
June 8; July 6, 20; August 3, 17	NREN Public Equity Program Team Meeting	Walker & Felice
June 9	Regional Vehicle Miles Traveled (VMT) Mitigation Program – Consultant Selection Committee	Barrett, Pedrotti & Ortega
June 10	California Energy Commission (CEC) Electrification Summit	Walker
June 10; July 22	NREN Governing Partners (GP) Meeting	Barrett, Walker & Felice
June 11; July 9, 23; August 6, 20	NREN Energy Careers Education & Training (ECET) Program Team Meeting	Walker, Felice & Hernandez
June 18	Strategic Highway Safety Plan (SHSP) Steering Committee	Barrett
June 18	NREN Home Energy Advisor Operations	Walker & Felice
June 18	NREN CLEAResult Kickoff	Walker
June 18; July 2, 16; August 6	NREN Finance Committee Meeting	Barrett, Walker & Felice
June 19	NREN Outreach at the Willits Hometown Celebration	Walker & Hernandez
June 22, 24, 25	California Climate and Energy Collaborative (CCEC) Forum/Los Angeles	Walker & Felice
June 23	NREN In-person Programs Meeting/Hollywood	Walker & Felice
June 23	Caltrans Conditional Award Meeting: SR 20 Willits MCIIS	Barrett, Villa, Pedrotti & Ortega
June 24	Regional Transportation Planning Agency (RTPA) Meeting	Barrett
June 24	Fiscal Year-end Training	Villa & St. Pierre
June 25	SHSP Action Development Workshop	Barrett

June 25	Mendocino Sea Level Rise (SLR) Meeting	Barrett, Pedrotti & Ortega
July 7	Pavement Management Program (PMP) and Sales Tax Meeting at Mendocino County Board of Supervisors (BOS) Meeting	Barrett
July 7, 22; August 4, 18	NREN Commercial Resource Acquisition (RA) Meeting	Walker & Felice
July 8	NREN Assessment Debrief Meeting	Walker & Felice
July 8	NREN Community Engagement for Goals Constructs Kickoff	Walker
July 8; August 12	NREN Governing Partners (GP) Voting Meeting	Barrett, Walker & Felice
July 16	Home Energy Advisor Operations Meeting	Felice & Hernandez
July 17	Rural Counties Task Force (RCTF) Meeting	Barrett
July 21	Highway Safety Improvement Plan (HSIP) Cycle 3 Workshop	Villa, Santos & Ortega
July 21	Mendocino County Board of Supervisors Sales Tax Item	Barrett
July 22	California Transportation (CT)/RTPA Meeting	Barrett
July 22	NREN Mendo at Willits Senior Center – Kit Event	Felice
July 22	Mendocino County Status Meeting	Ortega & Santos
July 23	Covelo Trail Project Meeting	Barrett & Sookne
July 23	NREN Home Energy Advisor Development Meeting	Walker & Felice
July 29	NREN Mendo at The Woods – Kit Event	Walker & Felice
July 29	CalREN Forum	Walker
July 30	Urban Greening Full Proposal Technical Meeting	Santos
July 30	Statewide Motorist Aid Committee Meeting	Barrett, Villa, Pedrotti & Ortega
July 30	MCOG and Boontworks Meeting	Barrett, DeFrieze, Ortega & Sookne
August 3	NREN DS Operations Meeting	Walker & Felice
August 3	NREN Assessment Follow-up Meeting	Walker & Hernandez
August 5	CalCOG Directors Association of California (CDAC)	Barrett
August 5	NREN Mendo at Ukiah Food Bank – Kit Event	Felice
August 6, 7, 8, 9	NREN Outreach at the Redwood Empire August Fair	Walker & Hernandez
August 6	NREN Commercial Equity Definition Meeting	Walker
August 10	State of Good Repair (SGR) Project List	Villa
August 12	NREN Spanish Translation Workshop	Felice, Hernandez & Lowblad
August 15, 16	NREN Outreach at the Round Valley Blackberry Festival in Covelo	Felice & Hernandez
August 17	Vehicle Miles Traveled (VMT) Kickoff Meeting	Barrett, Pedrotti & DeFrieze
August 20	NREN Home Energy Advisor Operations	Walker, Felice & Hernandez

We will provide information to the Board regarding the outcome of any of these meetings as requested.

ACTION REQUIRED: None.

ALTERNATIVES: None identified.

RECOMMENDATION: None. This is for information only.

MENDOCINO COUNCIL OF GOVERNMENTS
STAFF REPORT

TITLE: Planning Projects Update **DATE PREPARED:** 8/17/26

SUBMITTED BY: Hector Ortega, Project Analyst **MEETING DATE:** 8/24/26

BACKGROUND: Below is a summary of recent activity on current planning projects.

Mendocino County Sea Level Rise Roadway Impact Study - Based on a combination of criteria, including roadway use, the consequences of roadway failure, vulnerability to sea level rise and other climate impacts, potential adaptation approaches, implementation feasibility, and community feedback, the following five locations have been selected for further study; Point Cabrillo Drive in Caspar, Old Coast Highway in Gualala, Port Road “East” in Point Arena along the section that periodically experiences flooding, Lighthouse Road in Point Arena, and Ocean View Drive (at Cliff Way).

During the next phase of the study, team will focus on developing and evaluating adaptation options for each of the five selected locations. Different adaptations and strategies are currently being explored to address current and future climate-related impacts, with the goal of reducing risk and improving long-term roadway resilience. Potential adaptation measures may include roadway elevation or realignment, drainage improvements, shoreline protection features, alternate routing, or other strategies tailored to local conditions.

Once adaptation options have been developed, the study team will evaluate the benefits, risks, costs, and feasibility of each approach and identify a preferred adaptation strategy for each location. These findings will be documented in a Feasibility Study, which will be shared for public review. We anticipate this document being released in Winter 2026.

Mendocino County Pavement Management Program Update - The Data collection for the Pavement Management Program has been completed, and pavement condition data has been received for all participating agencies.

A walking survey and pavement condition assessment training was recently conducted in Ukiah with representatives from the participating jurisdictions. The training provided participants with an overview of the pavement condition assessment process and hands-on experience evaluating pavement conditions in the field.

The Mendocino County pavement condition was presented to the Board of Supervisors at the (insert date meeting. Draft reports for the County, the City of Ukiah, and the City of Willits have been received and are being reviewed.

ACTION REQUIRED: No action is required at this time. The purpose of this agenda item is to respond to any questions or concerns you may have and to provide an update on the Mendocino County Sea Level Rise Roadway Impact Study and the Mendocino County Pavement Management Plan Update.

ALTERNATIVES: None identified.

RECOMMENDATION: This item is presented for information and discussion only. Further updates will be provided as the projects progress.

MENDOCINO COUNCIL OF GOVERNMENTS

STAFF REPORT

TITLE: Mendocino County Regional Vehicle Miles Traveled Mitigation Program | DATE PREPARED: August 17, 2026

SUBMITTED BY: JD DeFrieze, Senior Planner | MEETING DATE: August 24, 2026

BACKGROUND:

MCOG is developing a Regional Miles Traveled (VMT) Mitigation Program to provide a coordinated approach for addressing transportation impacts under Senate Bill 743. The project will evaluate potential mitigation options – and identify projects and strategies that could reduce VMT and greenhouse gas emissions throughout Mendocino County. A regional program could provide lead agencies and project applicants with additional mitigation options when on-site measures are insufficient or infeasible. The project is funded through a Caltrans Sustainable Transportation Planning Grant.

Following a competitive procurement process, MCOG has selected Kimley-Horn to prepare the program plan and issued the firm a Notice to Proceed. Staff has coordinated with Kimley-Horn to schedule Task 1, the project kickoff meeting, for August 17, 2026.

ACTION REQUIRED:

No action is required at this time.

ALTERNATIVES:

None identified.

RECOMMENDATION:

None, for information only.

MENDOCINO COUNCIL OF GOVERNMENTS

STAFF REPORT

TITLE: SR 20 Willits Multimodal Circulation & Intersection Improvement Study

DATE PREPARED: August 17, 2026

SUBMITTED BY: JD DeFrieze, Senior Planner

MEETING DATE: August 24, 2026

BACKGROUND:

MCOG is initiating the SR 20 Willits Multimodal Circulation and Intersection Improvement Study to evaluate transportation conditions along the SR 20 corridor and at key intersections in the Willits area. The study is funded through a recently awarded Caltrans Sustainable Transportation Planning grant and will identify circulation, safety, and connectivity needs and develop a prioritized set of feasible improvements for pedestrians, bicyclists, transit users, and motorists. The resulting recommendations will help guide future project development and funding efforts.

MCOG has prepared a draft Request for Proposals (RFP) and is finalizing edits before publicly posting the RFP and initiating consultant procurement.

ACTION REQUIRED:

No action is required at this time.

ALTERNATIVES:

None identified.

RECOMMENDATION:

None, for information only.

MENDOCINO COUNCIL OF GOVERNMENTS

STAFF REPORT

TITLE: Northern Rural Energy Network (NREN) Update

DATE PREPARED: 8/14/26
MEETING DATE: 8/24/26

SUBMITTED BY: Orion Walker, Energy Program Manager

MCOG's NREN staff have been focusing on promoting and delivering our residential programs while continuing to work with our regional partners to develop our non-residential programs. Highlights of recent activity are as follows:

- Outreach season has been very active including two Redwood Empire fairs, Willits Frontier Days, Fort Bragg Food Bank, Willits Food Bank, Ukiah Food Bank, Willits Senior Center, The Woods, and this weekend Blackberry Festival in Covelo.
- In late June staff attended the annual California Climate and Energy Collaborative forum. Highlights included a break-out session with workforce education program leads from other RENs around the state, a session on newly available plug-in solar options, and a session on how to convert to electric without the expense of an electric panel upgrade.
- In mid-July we were happy to add a Specialist position to our team filled by Aldo Hernandez. As a long time, local resident with ties in the non-profit sector and fluency in Spanish he has quickly become a strong asset, particularly in our outreach activities.
- Staff has completed the candidate interview process and secured an accepted offer for a Civic Spark Fellow who will join our team in early October.
- In late July staff had a very successful event at The Woods in Little River. Staff will be returning on September 2nd to conduct onsite residential assessments, give away additional kits, and conduct an assessment of the non-residential facilities.
- Staff is working closely with regional partners to roll out our non-residential program offerings. At this time we have a newly launched offering for businesses, non-profits, and public agencies that covers 75-100% of the cost on lighting, controls, and heat pump water heater projects. Additional measures will be added soon. Please see the attached flyer, and please help us spread the word.
- The regional website (**northernren.org**) continues to be updated and developed with additional content. Residents can sign up there for Free Energy Efficiency Kits, Rebates, and Energy Efficiency Home Assessments.

ACTION REQUIRED: No action required – information only.

ALTERNATIVES: None.

RECOMMENDATION: No action required – information only.

Northern Rural Energy Network

Now Offering **Low to No-cost** Energy Efficiency Upgrades

Local businesses, non-profits, and public agencies may qualify through Northern Rural Energy Network's (NREN) Commercial Energy Services Program

Northernren.org

Eligible Upgrades

Heat Pump Water Heater (HPWH)

Replace an existing natural gas or electric resistance water heater with a high-efficiency HPWH

- Uses up to 75% less energy than traditional electric resistance water heaters
- Reliable hot water with lower operating costs

LED Lighting & Controls

Replace outdated lighting with energy-efficient LED fixtures and smart lighting controls.

- LEDs use up to 90% less energy than incandescent lighting
- Better light quality and reduced maintenance

More Upgrades coming soon!

Ready to Get Started?

info@northernren.org
(707)-397-2087

Contact NREN today to see if your business, non-profit or public agency qualifies

Must be a PG&E customer located outside City of Ukiah to qualify