2026 Mendocino County
Regional Housing Needs Allocation
Final Plan

Prepared by
Mendocino Council of Governments

MCOG

Proposed for Adoption
October 5, 2026

Introduction

This Regional Housing Needs Allocation (RHNA) Plan has been prepared by the Mendocino Council of Governments (MCOG), acting in its role as the Council of Governments (COG) for the Mendocino County region, pursuant to California Government Code Section 65584 et seq. The Plan determines the distribution of the region's total housing need (as established by the California Department of Housing and Community Development (HCD)) among the cities and County within the Mendocino County region for the current projection period beginning June 30, 2027, and ending August 15, 2035.

State law requires that every jurisdiction in California plan for its fair share of housing to meet the needs of six specific income levels, including: acutely low-, extremely low-, very low-, low-, moderate-, and above moderate-income households. The RHNA Plan is used to achieve this Statewide obligation by dividing the regional need into income specific units for each jurisdiction. Each city and county are required to demonstrate, through their respective Housing Elements, that adequate sites are zoned and available to accommodate their allocated share of the regional housing need.

This Plan documents:

1. The regional housing need number provided by HCD for the Mendocino County region;
2. The methodology used by MCOG to distribute that need among member jurisdictions, consistent with the statutory objectives set forth in Government Code Section 65584(d); and approved by HCD
3. The final allocation of housing units, by income category, to each jurisdiction within the region; and
4. The process by which jurisdictions may request revisions to their allocation, consistent with Government Code Section 65584.05.

The allocations contained in this Plan form the foundation for the Housing Element update process for each jurisdiction in the region and will remain in effect for the subject planning period.

HCD Regional Housing Need Determination

On August 15, 2025, the MCOG received from HCD a Final Regional Housing Need Determination of 6,456 total units distributed among six income categories noted above. These are specifically defined based on percentages of the Area Median Income (AMI) of $90,400, and shown below in Table 1.

The needs determination was derived using population projections from the Department of Finance as well as other demographic and economic related data. Among the factors used in the determination were those specified in State housing law, such as population growth, household size, overcrowding, vacancy rates, and cost burden. Some of these factors were used by MCOG to develop an allocation methodology from which the region’s five jurisdictions (i.e. cities of Fort Bragg, Point Arena, Ukiah and Willits, and the County of Mendocino) would be responsible for providing adequate land and zoning allowances to accommodate units needed in each of the six income categories.

Table 1 below provides the housing unit determination received from HCD broken down by income category.

Table 1

Income Category (% of Area Median Income)	Income Limits	% of Determination	Housing Unit Need
Acutely Low (15%)	$0 - $13,550	8.3%	533
Extremely Low (15-30%)	$13,551 - $31,200	13.8%	891
Very Low (30-50%)	$31,201 - $45,200	10.5%	677
Low (50-80%)	$45,201 - $72,300	17.8%	1,151
Moderate (80-120%)	$72,301 - $90,400	10.0%	648
Above Moderate (120%+)	$90,400+	39.6%	2,556
Total		100%	6,456

Following receipt of the determination, MCOG submitted an appeal and provided an alternative determination of 4,936 units. The appeal was based primarily on a lack of reliable data resulting in extremely high margins of error that prevented a reasonable application of HCD's methodology, as well concerns with the appropriateness of methodology itself. Additional areas of concern included: the 250% increase in units between Cycles 6 and 7 despite no growth in population, a one-size-fits-all approach to calculating the determination which doesn't take into account the differences in regional housing markets, and characteristics of the region's population that impact the region's housing needs. HCD ultimately rejected MCOG's appeal and justified the use of unreliable data arguing that high margins of error are typical for small, rural areas.

Constraints

There are a variety of issues that may potentially constrain growth and the ability of each local agency to provide for the development of housing. Potential constraints include, but are not limited to, water availability, infrastructure availability, and zoning/land use designations. Not only do these factors play a crucial role in the supply of housing, but they also influence the location of new employment centers.

Water Infrastructure

Compared to other parts of California, major development of water resources has not occurred in Mendocino County. Normally, the County receives substantial wintertime precipitation but relies on groundwater during the hot summer months. A number of unincorporated communities are built over "fractured hard rock," which stores groundwater in limited amounts, making residents especially susceptible to water shortages in dry years.

There are many water service providers in Mendocino County, including the cities, special districts, and private water purveyors. Many, however, have limited additional capacity, and some have maintained moratoriums in the past to restrict access. The Redwood Valley County Water District exemplifies many of these infrastructure limitations. Presently, when developing accessory residential structures, Redwood Valley applicants cannot obtain a domestic water connection for an accessory dwelling unit, due to a moratorium on residential connections.

As of June 2026, the Brooktrails Township Communities Services District, one of the County's larger unincorporated communities, only has seventeen available water/sewer connections.. Therefore, while opportunities for limited in-fill development exist, large-scale residential construction as required by HCD would necessitate substantial improvements to numerous water supply and distribution systems.

Sewer Infrastructure

Public sewer systems in Mendocino County are provided by cities, and special districts. There are at least nine major wastewater systems in the county, four of which primarily serve the incorporated cities, but also serve some unincorporated areas. Sewage disposal in the remainder of the county is generally handled by private onsite facilities, primarily septic tank and leach field systems, although alternative engineered wastewater systems may be used. In past planning documents, the County Division of Environmental Health cites the lack of sites for disposal of wastewater pumped from onsite systems as a countywide issue that constrains residential development.

Wastewater infrastructure, or lack thereof, has also imposed potential limits on development in some areas. Septic system constraints are an issue in Anderson Valley, as well as the community of Laytonville. The community of Laytonville is currently served by individual septic systems, but a high water table and high annual rainfall are contributing to septic system problems, which has led to the community studying the feasibility of a waste water treatment plant. Similar to water constraints, opportunities for limited in-fill development do exist, but large-scale residential construction as required by HCD will necessitate substantial improvements to wastewater systems and sewer infrastructure.

The Coastal Zone

Residential communities which lie within the Coastal Zone are subject to an additional layer of constraints due to development restrictions found within the County's Local Coastal Program (LCP) and maintaining overall compliance with the California Coastal Act. On top of the noted water and sewer constraints, regulations on "second units" within the Coastal Zone adds to the difficulties in finding affordable housing opportunities in these areas. Another of the factors listed within the adopted RHNA Methodology was "availability of appropriately zoned land," which is also an issue along the coastal regions of the County. Extensive areas along the County's coast consist of Environmentally Sensitive Habitat Areas (ESHA) which dramatically impact the County's ability to rezone additional land for increased density. For appropriately zoned land, the highly discretionary nature of coastal development, in general, and permitting requirements that would likely accompany multi-family type development, in particular, only adds to the challenge of increasing housing stocks within these areas.

Additionally, the goal of reducing vacation home growth as a share of new production conflicts 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 and/or Local Coastal Program provisions prioritizing public access and visitor-serving uses. This is reflected in

Mendocino County’s Local Coastal Program, which allows vacation home rentals or bed and breakfast accommodations as a permitted use by right in 11 of the 17 total zoning districts in the Coastal Zone, contributing to the conversion of many units to vacation home.

Fires, Floods, and Other Hazards

Unfortunately, substantial proportions of vacant or underutilized lands in the Willits and Ukiah areas, perhaps the most conducive for higher density residential development, are located either in an area with a high risk of wildfire, a flood zone, or situated near a fault zone. The combining zones created by these environmental settings require special conditions or building requirements, which must be satisfied before a structure can be built or substantially remodeled. An additional constraint if a structure is built is the ability, or lack thereof, to acquire adequate homeowners insurance. Furthermore, some rural communities, such as Brooktrails, are further challenged by the lack of adequate transportation access in the event of an evacuation or disaster.

In early 2025, the State updated their Fire Hazard Severity Zone (FHSZ) maps, severely impacting all of Mendocino County, placing over 69% of the region into a High or Very High FHSZ. These changes not only impact the unincorporated areas but also incorporated cities that have the most availability of services and utilities to support housing. In the recent changes, 1,443 acres within the City of Ukiah’s jurisdiction were categorized as Very High FHSZs, an increase of 272%, resulting in nearly half the city now in this zone. Unfortunately, the area most impacted by these changes encompasses much of the remaining land within the city available for housing development. The City of Willits also had 122 acres placed in the Very High FHSZ, as well as much of the unincorporated area around both Ukiah and Willits.

In general, major floods within Mendocino County have resulted from extended periods of winter rainfall produced by winter storms from the Pacific Ocean. Generally, these storms affect the region from early November until the end of March. From a sound planning perspective, it would seem appropriate to recognize the constraints created by flood plains as identified by the Federal Emergency Management Agency (FEMA). Several areas within the County are particularly prone to flooding. These include:

- State Route 128 at State Route 1, Navarro River
- State Route 175 at the Russian River Bridge
- State Route 1 at the Garcia River
- Talmage Court - east side of the Ukiah Valley
- City of Ukiah - eastern side along/near the Russian River
- Little Lake Valley near the City of Willits sewage treatment plant

The County has established a "Flood Plain Combining District" (FP) in its Inland and Coastal Zoning Ordinances. The FP zone applies to floodplain areas as delineated on Flood Insurance Rate Maps prepared by Federal Emergency Management Agency (FEMA). Certain development within the combining district is prohibited, while other development is subject to standards designed to reduce flood hazards. While the cost of housing in these areas may be increased and subsequently limited, these measures are necessary to protect life and property.

The County's Zoning Ordinances also includes special districts for seismically active areas. Mendocino County is also subject to seismic safety standards for the design and construction of buildings within *Seismic Zone 4* as identified in the Uniform Building Code (UBC). The County's Building Division ensures that structures in the County comply with the UBC and the zoning ordinances. The San Andreas Fault traverses the southwest corner of the County and continues offshore north of Manchester. The Mayacama fault extends from northern Sonoma County to north of Laytonville in Mendocino County. Both of these faults have established Earthquake Fault Zones. In total, five active or potentially active faults traverse Mendocino County.

Mendocino County RHNA Allocation Methodology

Based on the housing needs determination received from HCD, MCOG initiated the development of an allocation methodology in which to assign units to the region's jurisdictions. A "RHNA Methodology Committee" was formed, made up of community development representatives from the County of Mendocino and the cities of Fort Bragg, Point Arena, Ukiah, and Willits, as a means of determining an equitable distribution among the region's member agencies. Members of the Methodology Committee included:

Julia Krog, County of Mendocino
Liam Crowley, County of Mendocino
Sarah Peters, City of Fort Bragg
Paul Anderson, City of Point Arena
Craig Schlatter, City of Ukiah
Jesse Davis, City of Ukiah
Dusty Duley, City of Willits
Nephele Barrett, MCOG
James Sookne, MCOG

A series of committee meetings were held between September 2025 and May 2026, in which discussion focused on appropriate methods of fair share housing unit distribution between regional jurisdictions. During this time, multiple iterations of the methodology were discussed and developed.

The first was based on the Cycle 6 Methodology; however, RHNA statutes had changed significantly between Cycles 6 and 7 and HCD rejected this version. The second iteration was based on several statutory factors applicable to the region including jurisdictional population, median household incomes, overcrowding, cost burden, and employment opportunity. It also included a manual adjustment to account for an annexation as well as the potential for additional manual adjustments should the committee deem necessary. HCD accepted this iteration for review but ultimately rejected it, stating that HCD needed to see all proposed manual adjustments before they're able to properly review it. A third iteration, which included manual adjustments to further Objective 5 – Affirmatively Furthering Fair Housing (AFFH) and account for rounding, was submitted to HCD in February 2026. HCD determined that this version was better than the previous two but, in their opinion, failed to adequately further Objectives 2 and 3 (see below). Following HCD's review of the third iteration, MCOG made two more changes: (1) a calculated adjustment to further Objective 3 that was based on the ratio of lower income jobs to lower income RHNA units and (2) a manual adjustment based on HCD guidance aimed at furthering Objective 2. Following review by the Methodology Committee and approval by consensus, this fourth, and final, iteration of the draft methodology was submitted to, and approved by, HCD in May 2026.

The resulting methodology was used to further five specific "objectives," of State housing law, per Government Code Section 65584(d). The objectives listed below include a brief discussion of how they were addressed within the methodology:

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.

The methodology included 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 was used to adjust a final allocation in order to bring local housing markets into balance with respect to the six income levels. Additionally, jurisdictional deviation above or below average Overcrowding and Cost Burden factors were also used in an attempt to level the playing field. The methodology also included manual adjustments used to address other factors such as Jobs/Housing disparities, etc.

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 were applied at the end of the process to help with socioeconomic equity. Conversely, Willits wanted 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. Additionally, it is worth noting that the VMT discussed in this objective is a jurisdiction-wide average VMT. MCOG tried to convey to HCD that different areas within the region could have equally low VMT; however, HCD wouldn't accept this reasoning because through the RHNA process, HCD can't dictate where units will be located.

In its review of the methodology, HCD confirmed that the approach promotes infill development and efficient development patterns by ensuring that jurisdictions with lower per capita VMT receive larger shares of the regional RHNA allocation. Additionally, the approved 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 (see attached Appendix A: letter from HCD, dated May 18, 2026).

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.

HCD's review found that lower-income job to lower-income housing ratios across Mendocino County jurisdictions varied significantly, with Ukiah at 0.65 and the unincorporated County at 1.41, despite the City of Ukiah having an outsized number of regional jobs compared to its underlying population. Consistent with this imbalance, HCD determined that the methodology appropriately allocates a proportionally higher share of the regional RHNA to 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 methodology also 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 (see attached Appendix A: letter from HCD, dated May 18, 2026).

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.

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 a disproportionately large percentages of acutely-, extremely-, very-, and low-income units. The methodology supports this objective by aiming to correct the imbalances, where deemed appropriate.

HCD's review confirmed this outcome, finding that the methodology allocates more lower-income RHNA, on a per-household basis, to jurisdictions with fewer existing lower-income households (see attached Appendix A: letter from HCD, dated May 18, 2026).

5. Affirmatively furthering fair housing.

Government Code Section 65584(e) defines "affirmatively furthering fair housing" (AFFH) as

> [T]aking 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.

The 2025 Opportunity Mapping Tool discussed within the 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 subject jurisdictions. The intention was to incorporate AFFH concepts into its overall distribution.

HCD's review affirmed this approach, finding that jurisdictions with a higher percentage of their population located in high- or highest-resource opportunity areas, as indicated on the 2025 COG Geography TCAC/HCD Opportunity Map, receive a proportionally greater share of lower-income RHNA allocation (see attached Appendix A: letter from HCD, dated May 18, 2026).

Applying the agreed upon methodology involved a process of refining and re-refining allocation figures beginning with a baseline proportionality derived from population breakdown between jurisdictions (see Appendix B: RHNA Methodology Table 2). When taken as an overall share of the assigned RHNA determination (6,456), a starting point was arrived at from which subsequent adjustments could be made. The process continued by applying factors such as Median Household Income (MHI), overcrowding, cost burden, and other percentages derived through research of demographic and economic data again broken down by jurisdiction. The final steps included specific manual adjustments required by HCD to meet their internal thresholds for objective compliance. Details of the process can be found in the attached RHNA Methodology.

Mendocino County RHNA Allocation

One of several differences between Cycles 6 and 7 of the RHNA process is the development of the allocation methodology for Cycle 7 included calculating the draft allocation. Therefore, the draft allocation was essentially determined at the time the methodology was approved. Table 2 lists the draft allocation figures resulting from the methodology agreed upon by the committee, and that was ultimately adopted by the MCOG Board at a public hearing held on June 1, 2026. At the same meeting, the MCOG Board issued the draft allocation.

Table 2

Draft RHNA Allocation						
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

Agency Notification & Appeal

On October 6, 2025, an initial version of the Draft Methodology was presented before the MCOG Board of Directors at a public hearing. Following additional consultation with HCD and the Methodology Committee, resulting in significant changes to the Draft Methodology, a second public hearing was held on February 2, 2026.

On June 3, 2026, following issuance of the draft allocation by the MCOG Board, MCOG provided official notices to each of the local agencies notifying them of the proposed draft allocation that would be used in preparation of the RHNA Plan. Government Code Section 65584.05(b) states that the allocation may be appealed "within 30 days following receipt of the draft allocation." The appeal period ended on July 3, 2026, with one appeal received from the City of Ukiah.

After 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 3F) the public hearing required by GC 65584.05(d) to be held at the August 24 Board Meeting. Following the public hearing, the Board rejected the City's appeal, determining that in general, the requirements imposed on our region through HCD's implementation of RHNA statutes are detrimental to *all* jurisdictions within the region and that modification at this time is unlikely to be productive as statute provides for HCD's final approval and/or modification of the allocation. Although the MCOG Board recognized that the City does face significant constraints, the other jurisdictions also have significant constraints, such as lack of infrastructure, that make housing implementation difficult. The Board directed staff to issue the plan and final allocation.

Outreach and Public Review

In accordance with GC 65584.04(d), MCOG solicited input on the draft methodology from local agencies and community-based organizations that serve underrepresented population groups including the Redwood Coast Regional Center, the Area Agency on Aging of Lake and Mendocino Counties, the Mendocino County Department of Social Services, the Rural Communities Housing Development Corporation, and North Coast Opportunities. An effort was also made to involve the public in the allocation process, including following public review requirements included in statute. Notices were published in the countywide newspaper informing the public of both the proposed methodology and adoption of the allocation plan. Information, including the draft methodology and updates on the process were also available on the MCOG website for public review. Finally, the public was provided an opportunity to comment at public hearings for both the methodology and final allocation plan.

Annexation Policy

This policy, adopted by MCOG November 4, 2002, establishes a process for the redistribution of the housing needs allocation set forth in the adopted Regional Housing Needs Plan (RHNP) in the event of annexation, detachment, incorporation or other change of organization between the county and any member city during the planning period.

1. Pre-Application Process
   Prior to filing an application with the Local Agency Formation Commission (LAFCo) for a change of organization between the county and any member city, such as an annexation, detachment, incorporation or any combination thereof, the applicant is encouraged to file a pre-application with the county and subject city. The county and subject city are encouraged to engage in a pre-application process to review the RHNP allocations for potential redistribution. The proposed reallocation and any conditions thereof shall be submitted to the Mendocino Council of Governments (MCOG). A copy shall be submitted to LAFCo.

2. Filing of Application for Annexation, Detachment or Incorporation
   If a pre-application has not been undertaken, upon receipt of the LAFCo notice of filing of a proposed change of organization, the county or subject city may submit to the other and MCOG a request for redistribution of the RHNP allocations. A copy shall be submitted to LAFCo.

3. County/City Negotiations
   The county and subject city shall negotiate in good faith to redistribute the RHNP allocations. The redistribution shall not result in a net reduction in the regional housing and population totals set forth in the RHNP adopted by MCOG, nor in the allocation assigned to any other member city. The subject city and county may otherwise negotiate any redistribution and conditions thereof that are mutually agreeable.

4. MCOG Mediation
   If the county and subject city cannot reach a mutually acceptable agreement for redistribution within 60 days from the date of LAFCo filing, one or both jurisdictions may request MCOG to mediate the redistribution of RHNA allocations. The mediation period should not exceed an additional 30 days unless a longer period is mutually agreed to. The purpose of mediation is to achieve a mutually acceptable redistribution.

Proposed Final Allocation

Table 3 below shows the proposed final allocation.

Table 3

Proposed Final RHNA Allocation						
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
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Above Moderate	2,556	231	8	519	174	1,624
Total	6,456	668	35	1,500	473	3,780

Appendix A: Letter from HCD, dated May 18, 2026

STATE OF CALIFORNIA - BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY GAVIN NEWSOM, *Governor*
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT
651 Bannon Street, Ste. 400
Sacramento, CA 95811
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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.

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[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

Appendix B: RHNA Methodology

MENDOCINO COUNCIL OF GOVERNMENTS

BOARD of DIRECTORS

RESOLUTION NO. M2026-08

ADOPTING THE METHODOLOGY FOR THE
2026 MENDOCINO COUNTY REGIONAL
HOUSING NEEDS ALLOCATION

WHEREAS,

- The State of California has determined that the Council of Governments is the appropriate agency to conduct the Regional Housing Needs Allocation Process;

- MCOG is required to adopt a methodology to be used in development of the Regional Housing Needs Allocation;

- MCOG staff met with a RHNA Methodology Committee made up of local agency community development officials on September 4, November 25, January 23, February 2, April 28, and May 11, to formulate and revise a workable draft methodology;

- MCOG released a draft RHNA Methodology to local agencies on September 22, 2025, with subsequent revisions released on December 5, 2025, February 10, 2026, and May 18;

- MCOG had an extended public comment period and held noticed public hearings on the RHNA Methodology on October 6, 2025, and February 2, 2026;

- MCOG distributed the draft methodology to local agencies and community-based organizations who work with underserved populations;

- Local agencies had the opportunity to provide comment on the draft Methodology, which have now been incorporated into a final document, attached as Exhibit A;

- The RHNA Methodology will result in a draft allocation of housing units as follows:

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

- Section 65584.05(a) of the California Government Code states that "It is the intent of the Legislature that the draft allocation should be distributed before the completion of the update of the applicable regional transportation plan"; therefore, be it

RESOLVED THAT:

The Mendocino Council of Governments hereby adopts the Methodology to be used in the 2026 Mendocino County Regional Housing Needs Allocation.

ADOPTION OF THIS RESOLUTION was moved by Director Mulheren, seconded by Director Rafanan, and carried this 1st day of June, 2026, by the following roll call vote:

AYES:	Rafanan, Mulheren, Criss, and Chair Haschak
NOES:	None
ABSTAINING:	None
ABSENT:	Alaniz and Hansen

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

Nephele Barrett
ATTEST: Nephele Barrett, Executive Director

John Haschak
John Haschak, Chair

- Section 65584.05(a) of the California Government Code states that "It is the intent of the Legislature that the draft allocation should be distributed before the completion of the update of the applicable regional transportation plan"; therefore, be it

RESOLVED THAT:

The Mendocino Council of Governments hereby adopts the Methodology to be used in the 2026 Mendocino County Regional Housing Needs Allocation.

ADOPTION OF THIS RESOLUTION was moved by Director Mulheren, seconded by Director Rafanan, and carried this 1st day of June, 2026, by the following roll call vote:

AYES:	Rafanan, Mulheren, Criss, and Chair Haschak
NOES:	None
ABSTAINING:	None
ABSENT:	Alaniz and Hansen

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

John Haschak

ATTEST: Nephele Barrett, Executive Director

John Haschak, Chair

Reso. M2026-08
Exhibit A
13 pages

Mendocino Council of Governments

Regional Housing Needs Allocation

Cycle 7: 2027 – 2035

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.