

Background on RHNA & Units Lost During a State of Emergency

Units lost in a state of emergency is included as a factor in the Regional Housing Needs Determination (RHND). In addition, Councils of Governments (COGs) must survey their member jurisdictions based on a list of factors, which includes units lost in a state of emergency, and consider this list of factors when creating their Regional Housing Needs Allocation methodology. State statute does not currently direct COGs in how to include this factor in the allocation methodology, but recent statutory changes have directed COGs to consider wildfire risk as one of many opportunities and constraints on development capacity. Below are some of examples how this adjustment factor has been applied in the past.

- Butte County Association of Governments (BCAG) was the only COG to receive an adjustment to their regional determination for the units lost in a state of emergency factor in addition to the normal replacement adjustment. BCAG allocated the units attributed to this adjustment directly to the jurisdictions where the units were destroyed. The units were not distributed across the entire region.
- Other regions (SCAG and ABAG) assumed the units lost during a state of emergency were accounted for in replacement adjustment determined by HCD. The replacement adjustment was distributed across the entire region according to the methodology formulas used by the COG.
- For the 7th cycle non-COG determinations and allocations HCD created a separate adjustment for the region that accounts for units lost in a state of emergency. The allocation formula then distributed the adjusted determination throughout the region toward furthering the 5 statutory objectives of RHNA.