

December 8, 2008

Spencer Clifton, Executive Director
Humboldt County Association of Governments
427 F Street, Suite 220
Eureka, CA 95501

Dear Mr. Clifton:

It is our understanding that the Regional Housing Needs Allocation (RHNA) criteria were generated in June, 2008, that is, "a methodology for distributing the existing and projected regional housing need to cities and counties" was developed.

In accordance with California Government Code 65584.04 (c), this letter is a written request for "the proposed methodology, along with any relevant underlying data and assumptions, and an explanation of how information about local government conditions gathered pursuant to subdivision (b) has been used to develop the proposed methodology, and how each of the factors listed in subdivision (d) is incorporated into the methodology" developed in June, 2008 that will be applied in the Housing Element to be adopted by the Board of Supervisors on or before August 31, 2009.

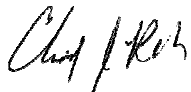
Please let us know how and when the public was involved in development of the methodology in light of the following government code (bold added for emphasis):

- California Government Code 65584.04 (a) states, "**At least two years prior** to scheduled revision required by Section 65588 [Housing Element revision], each council of governments, ..., **shall** develop a proposed methodology for distributing the existing and projected regional housing need to cities, counties...";
- 65584.04 (c) states "Public participation and access **shall** be required **in the development of the methodology** and in the process of drafting and adoption of the allocation of the regional housing needs."
- 65584.05 (a) states, "**At least one and one-half years prior** to the scheduled revision required by Section 65588, each council of governments ... **shall** distribute a draft allocation of regional housing needs to each local government in the region of subregion, where applicable, based on the methodology adopted pursuant to Section 65584.04."

With a process that has directed over half the housing growth into the unincorporated County in the 2003 Regional Housing Needs Plan, we believe a healthy discussion would be productive in deciding where to best direct growth in this plan. Please let us know specifically where we are in the regional housing needs allocation process and how/when we can participate.

Thank you for your attention to our requests.

Sincerely,



Chris Rall – Policy Coordinator
Healthy Humboldt Coalition

Cc: Board Members of HCAOG
Board of Supervisors
Trinidad City Council
Blue Lake City Council
Arcata City Council
Eureka City Council
Ferndale City Council
Fortuna City Council
Rio Dell City Council