



December 17, 2025

HCAOG Board of Directors
Humboldt County Association of Governments
611 I Street, Suite B
Eureka, CA 95501

Re: HCAOG Board Meeting December 18, 2025 Agenda Item 9a RHNA Methodology Adoption

Chair and Board Members:

The Environmental Protection Information Center (EPIC) & Coalition for Responsible Transportation Priorities (CRTP) respectfully urge the Humboldt County Association of Governments (HCAOG) Board to **adopt Alternative 2** as the Regional Housing Needs Allocation (RHNA) methodology for Cycle 7. EPIC is a nonprofit environmental organization dedicated to protecting the North Coast's forests, rivers, and ecosystems. The Coalition for Responsible Transportation Priorities (CRTP) is a 501(c)3 nonprofit focused on transportation safety, equity, and sustainability, and advocates for a transition to a zero-carbon transportation system. We are commenting on this methodology because we are concerned with land-use patterns that exacerbate sprawl that threatens wildlife habitat, increase vehicle miles traveled (VMT), and undermine the State's climate and transportation mandates. Of the alternatives being presented by HCAOG staff, Alternative 2 most effectively aligns RHNA with these objectives.

Transportation is the largest source of greenhouse gas emissions in California and in Humboldt County. The just-passed Humboldt County Regional Climate Action Plan identifies strategies for reducing our VMT and associated GHG emissions as the primary strategy for reducing greenhouse gas emissions in our region. AB 1279, codified at Cal. Health & Safety Code § 38562.2, requires an 85% reduction in GHG emissions below 1990 levels by 2045. Constructing new housing in car dependent, sprawling locations would lock in emissions well past 2045 making achieving that goal extremely difficult. Moreover, sprawl is not a neutral outcome. Low-density, car-dependent growth increases infrastructure costs, consumes wildlife habitat and working lands, worsens air quality, and disproportionately burdens lower-income households with higher transportation expenses. According to Housing & Community Development (HCD) "[a]fter housing, transportation is the second-largest household expense, so any conversation about housing affordability must examine transportation costs."¹ The Federal Department of

¹ California Department of Housing and Community Development. Housing and Transportation. State of California, <https://www.hcd.ca.gov/policy-and-research/intersectional-policy-work/housing-and-transportation>. Accessed 16 Dec. 2025



Transportation agrees.² The Center for Neighborhood Technology has developed a Housing and Transportation Affordability Index that is widely used to examine housing and transportation costs.³ Looking at Humboldt County, the map clearly shows lower housing + transportation costs in urbanized areas of the County.⁴ In Humboldt County, RHNA methodology is one of the few regional tools capable of addressing these impacts at their source. Alternative 2 appropriately steers new housing toward areas where residents are less likely to be forced into long, expensive, and high GHG-emitting automobile-dependent commutes while protecting our natural and working lands.

In contrast, Alternative 3 dilutes the influence of VMT by reducing it to one-third of the below-moderate allocation formula and adding an income-parity variable that is only indirectly related to climate or transportation outcomes. If the concern is that Alternative 3 better Affirmatively Furthers Fair Housing (AFFH) than Alternative 2, the use of the Opportunity Score in Alternative 2 accomplishes that better than the income parity metric used in Alternative 3.

EPIC & CRTP respectfully urge the Board to **adopt Alternative 2**. It is the alternative that most clearly reduces vehicle miles traveled which will save Humboldt County residents money, aligns housing growth with climate goals, and integrates fair housing principles without sacrificing environmental protection.

We appreciate HCAOG staff's thoughtful work on these alternatives and your consideration of these comments.

Sincerely,

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² United States, Department of Transportation, Bureau of Transportation Statistics. *Household Cost of Transportation: Is It Affordable?* <https://www.bts.gov/data-spotlight/household-cost-transportation-it-affordable>. Accessed 16 Dec. 2025.

³ Center for Neighborhood Technology. *H+T Affordability Index Map*. Housing + Transportation Affordability Index, <https://htaindex.cnt.org/map/>. Accessed 17 Dec. 2025.

⁴ Id.