



September 15, 2025

Chair Mike Johnson & Board of Directors
Humboldt County Association of Governments
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RE: Regional Housing Needs Assessment (RHNA) Allocation Methodology

Dear Chair Johnson and Directors:

The Coalition for Responsible Transportation Priorities (CRTP), Environmental Protection Information Center (EPIC), and Redwood Coalition for Climate and Environmental Responsibility (RCCER) appreciate the efforts of HCAOG, city and county staff to develop a workable RHNA allocation methodology that is consistent with mandated state goals and policies. However, we are concerned that for your September 18, 2025 meeting, you have been presented with only two options to choose from, both of which are similar in their outcomes and very limited in the variables they consider. We urge the Board to consider other options that more accurately reflect local priorities and state mandates, and that put more emphasis on the impact of new housing on climate, transportation, and other key factors.

Limited Variables

Both of the methodology options presented to you include only two variables: existing population and existing jobs. Location near existing jobs is a good proxy for several other relevant considerations, including greenhouse gas emissions, vehicle miles traveled (VMT), cost of living, and access to destinations.

Location near existing population, on the other hand, is not a very good proxy for important considerations. Your staff report argues that it is a proxy for cost burden, vacancy rates, and overcrowding, but we disagree. Existing population only tells you where people live; it provides no information about their living conditions, and certainly not about where they *want* to live. If HCAOG wishes to incorporate cost burden, vacancy rates, and overcrowding into its

methodology—and these are state-mandated considerations—then it should incorporate these variables directly, rather than relying on the relatively unhelpful existing population figures.

Additionally, other state-mandated considerations, including development constraints such as sewer and water availability and the housing needs generated by Cal Poly Humboldt, do not seem to be included in the methodology at all.

Two Options with Similar Outcomes

The two methodology options are not only limited in the variables they consider, they are also similar in the weightings of those variables, and consequently produce similar outcomes.

Whether to weight jobs and population equally (50%/50%) or weight jobs slightly more (60%/40%) does not change the outcome much. In order to meet the state-mandated objectives to promote infill development, protect against sprawl, and reduce greenhouse gas emissions through the RHNA methodology, jobs must be weighted much more heavily—at least 75%/25%, if population is the only other variable under consideration.

In sum, we request that the methodology incorporate additional relevant variables to more accurately reflect both local priorities and state-mandated goals and considerations, and that existing jobs (and/or other variables reflecting the climate, VMT, access, and cost of living implications of new housing) be weighted much more heavily.

Thank you for your consideration of our comments.

Sincerely,

Colin Fiske
Executive Director
Coalition for Responsible Transportation Priorities (CRTP)

Tom Wheeler
Executive Director
Environmental Protection Information Center (EPIC)

Melodie Meyer
Co-Director
Redwood Coalition for Climate and Environmental Responsibility (RCCER)