



December 10, 2025

Executive Director Brendan Byrd
Board of Directors & Policy Advisory Committee Members
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RE: Draft 2026-2046 Regional Transportation Plan

Dear Mr. Byrd, Directors, and PAC Members:

We appreciate the opportunity to comment on the draft Humboldt County 2026-2046 Regional Transportation Plan (RTP), also known as “VROOM.” We believe the current RTP presents a strong vision for regional transportation, and we support HCAOG’s approach of keeping the current document intact, with some changes. That said, we have major concerns about the following changes proposed by HCAOG, and we ask that you address these concerns as follows.

Delay of Target for New Non-Car-Dependent Housing

The draft RTP proposes to delay the date by which 80% of new housing should be “in places with safe, comfortable, and convenient access to employment, shopping, and recreation by walking, biking, rolling, or transit” to 2030 (p.2-19). The current target date is 2022, which means that this policy is currently in effect, and the proposed change would remove the existing policy and delay the target an additional 5 years.

Two justifications for this change have been offered publicly. Neither one stands up to scrutiny.

The first purported justification is that the change is needed in order to ensure consistency with the Regional Housing Needs Assessment (RHNA) allocation methodology. However, the target of 80% already allows 20% of new housing to be built in areas that don’t meet the standard. And with the proposed RHNA methodology, only about 3.7% of housing units are allocated to *exclusively* high-VMT jurisdictions (Trinidad, Blue Lake, Rio Dell, and Ferndale). If the unincorporated county meets its RHNA allocation by building mostly in places like Myrtle town

and McKinleyville—which it should and which it has indicated an intention to do—then the proposed RTP change is not necessary.

The second justification is that no local jurisdictions are currently able to meet the 80% target due to insufficient bike and pedestrian infrastructure. However, the RTP defines “safe, comfortable, and convenient” in terms of travel time—i.e., location—not infrastructure (or metrics which incorporate infrastructure, such as Walk or Bike Scores). Specifically, “safe, comfortable and convenient travel” is defined as location where “people are able to travel: from home to work within 20 minutes in urbanized areas or within 35 minutes outside urban areas, without riding in a private car; from home to essential non-work destinations (e.g., school, local shopping, transit connections) within 15 minutes in urbanized areas or within 30 minutes outside urban areas, without riding in a private car.” In other words, the lack of infrastructure—while clearly problematic—does not offer a justification for delaying this location-based target.

Finally, the location of new housing construction will have decades-long effects on the development patterns of Humboldt. New sprawling homes would require new roads, new services, etc. The choices we make from now until 2030 will have ramifications far into the future. If we want to focus development on places that are safe, comfortable, and convenient by walking, biking, rolling or transit, we should start doing so now rather than build new housing that won’t comply with our goals four years from now. Is the plan to try to squeeze in a substantial amount of new, non-accessible housing between now and 2030? If not, this change doesn’t make any logical sense.

We request that the RTP policy for 80% of new housing to be “in places with safe, comfortable, and convenient access to employment, shopping, and recreation by walking, biking, rolling, or transit” remain in effect, and not be delayed to a future year.

Climate Crisis

The new draft RTP replaces the phrase “climate crisis” with the term “climate change” throughout the document. This change is troubling, especially at a time when the federal government is working actively to undermine any sense of urgency to address the crisis and literally scrubbing the word “climate” from federal documents and websites—leaving local governments with an even greater responsibility to take action.

Scientists tell us that the urgency of reducing GHG emissions has only grown in the four years since the last RTP update, and it most certainly qualifies as a crisis. In fact, both scientists and government agencies around the world routinely use the phrase “climate crisis” to describe the situation. HCAOG removing the word “crisis” from the RTP sends exactly the wrong message at exactly the wrong time.

The absurdity of this change is highlighted by a proposed change on p.3-19, where a quote from the California State Transportation Agency (CalSTA)¹ has been edited to remove the phrase “climate crisis.” This suggests HCAOG is trying to misrepresent the State of California’s own characterization of climate change as a crisis, which is confounding and dishonest.

¹ <https://calsta.ca.gov/subject-areas/climate-action-plan/faq>

We request that the RTP restore the previous language throughout the document identifying climate change as a crisis.

Complete Streets Projects

The table of “Complete Streets” projects in the draft RTP (Table Streets-4) includes a number of projects that do not appear to include any features for people walking, biking, rolling, or riding the bus. Projects cannot be identified as complete streets projects if they do not include infrastructure for all road users.

We request that projects in the RTP's "Complete Streets" table of projects that do not include bike, pedestrian, and transit improvements in their descriptions either be removed from the table or specify that such improvements will be included.

Funding Consistency Analysis

The draft RTP proposes to remove the Funding Consistency Analysis found in the previous RTP at p.12-15. This action called for HCAOG to do three things: (1) prepare a report assessing the effects of recent projects funded by HCAOG on RTP goals; (2) annually track the benefits of funded projects with respect to RTP priorities; (3) consider adopting a program to rate future projects for their consistency with the RTP. The first action was completed, although the results were not very informative, both because the analysis categorized project impacts broadly without examining actual amounts spent for different purposes, and because recent HCAOG discretionary funding was dominated by a single project. The remaining two tasks have not been completed.

Both before and after the Board decided to include this action in the previous RTP, HCAOG’s Technical Advisory Committee (TAC) expressed vociferous objections to the idea that HCAOG would subject projects to an analysis of consistency with the RTP before making funding decisions. This objection suggests an antipathy toward the reason for HCAOG’s very existence, which is to guide transportation planning on a regional level. It also suggests that members of the TAC do not take the RTP itself seriously, given that the RTP’s Overall Objective is: “Program all transportation funds based on multi-modal transportation goals and objectives, and needs and priorities as established in the Regional Transportation Plan.” Similarly, one of the RTP’s Performance Indicators is: “Are investments in RTIP projects [HCAOG’s primary discretionary funding source] helping achieve RTP goals?” (p.7-27).

Furthermore, the RTP goals were not developed in a vacuum. Public input solicited by HCAOG as part of the RTP and other transportation plans makes it clear that the community’s priority is investment in improving safety and reducing climate pollution from transportation.

The TAC’s objections are unsupportable. HCAOG must ensure that discretionary funding decisions align with RTP goals, targets, and policies, duly adopted by the Board with support from the public. The HCAOG Board tacitly acknowledged this reality when including the Funding Consistency Analysis in the previous RTP despite the TAC’s objections. The Board must now advance this crucial reform further.

We request that the Funding Consistency Analysis action be retained in the RTP, and that HCAOG commit to developing an objective RTP consistency analysis for future funding decisions.

Major Transit Stops

We support the designation of major transit stops for land use planning purposes, incorporated into the draft RTP on p.9-2. We request that additional major transit stops be designated, as previously discussed by the HCAOG Board, including at least one stop in McKinleyville.

Other Concerns

- While we acknowledge the reality that certain climate-related targets from the last RTP—such as those for installing electric vehicle charging infrastructure and purchasing zero-emission vehicles for public fleets—have not been met, it is nonetheless troubling to see these target dates pushed out into the future. Delaying targets undermines the very real urgency which should be driving such actions.
- We object to the proposed changes to complete streets investment targets (p.2-21). The proposed delays in targets for increased active transportation funding are unacceptable given the great need and the local safety crisis for pedestrians and bicyclists. Furthermore, including “complete streets projects” as eligible for such funding increases, rather than just “active transportation,” is troubling because projects that primarily focus on vehicular infrastructure are often called “complete streets projects” if they include even the most rudimentary bike or pedestrian features. The current language and target dates around this funding should be retained, and the proposed changes rejected.
- The RTP continues an outdated practice of measuring safety goals in terms of the rate of collisions (per miles, per bicyclist, etc.) rather than the absolute number of fatal and severe injury collisions (p.7-26). The RTP has an official Vision Zero goal, and Vision Zero doesn't care about the rate—it cares about the absolute number. The RTP should change its measurement of safety progress to consider absolute numbers of fatal and serious crashes, not rates.
- Language on p.2-5 that pointed out that an aging population will mean more nondrivers and a greater demand for transit and active transportation is proposed for removal. This fact has not become any less true in the last four years, and makes an important policy point. The language should be retained.
- Language is proposed to be added on p.2-6 arguing that a slight recent increase in vehicle ownership rates indicates a “need for conventional roadway improvements and maintenance.” This is a misinterpretation of the data. It is highly likely that high vehicle ownership rates are the result of existing car-dependent land use patterns and infrastructure, not an indication of a need to double down. This language should be removed.
- The controversial Richardson Grove highway expansion project is included in the Goods Movement element. This project is unnecessary, environmentally damaging, has been mired in litigation for almost 20 years, and will probably never be built. It should be removed from the RTP.

Thank you for your consideration of our comments.

Sincerely,

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