

December 18, 2025

Humboldt County Association of Governments
Attn: Brendan Byrd, Executive Director
611 I St. Suite B
Eureka, CA 95501

Sent email to Brendan.byrd@hcaog.net

Re: Regional Housing Needs Allocation (RHNA) Methodology Adoption

Dear Humboldt County Association of Governments:

We are writing to provide comment on the Board's Action Item (A) Regional Housing Needs Allocation (RHNA) Methodology Adoption. On September 25, 2025, the Board presented for public review and comment its preliminary decision to adopt a preferred RHNA allocation method. After receiving public comments, and preliminary comments from HCD, the Board is now considering adoption of a method different from either of the original methodologies and is presented with three alternative methodologies for RHNA allocation, with staff recommending adoption of Alternative No. 3.

We urge the Board to adopt Alternative No. 2's methodology which allocates RHNA by weighing the opportunity score at 30%, and Vehicle Miles Traveled (VMT) at 70%. This approach most effectively furthers the five statutory objectives of RHNA (Gov. Code § 65584(d)), including affirmatively furthering fair housing, and is tailored to unique aspects of the region. We comment in response to HCAOG's September 25, 2025 public notice and pursuant to California Government Code § 65584.04(d).

Legal Services of Northern California ("LSNC") is a nonprofit civil legal aid organization providing legal assistance to low-income individuals and families throughout Humboldt County. LSNC is a qualified legal services provider and the Legal Services Corporation grantee for Humboldt County. Our Eureka office provides representation and assistance to Humboldt County residents in housing cases as a core part of our work, partnering with local community organizations and agencies to advocate for stable and affordable housing for low-income tenants. LSNC's priorities include the preservation of housing and civil rights, including fair housing advocacy.

Humboldt County residents are transportation cost burdened, imposing significant barriers to opportunity.

Humboldt County has a relatively low population of approximately 137,000 people across a large county of 3,570 square miles. The County's median household income is 64% of the statewide median income. Further, Humboldt County has a disproportionate number of disabled individuals at 19.6% compared to a statewide average of 12.1%; and a high population of older adults with 18.1% of Humboldt County's population 65 years or older compared to a statewide

average of 14.4%¹. These metrics matter because it means that many Humboldt County residents have less income and a higher need for access to resources like healthcare, education, and other supportive services. The majority of jobs, healthcare, and community resources in our County are concentrated in Eureka.

On average, Humboldt County residents spend 28% of their income on transportation costs, with this percentage increasing for lower income households². Further, over 56% of renters in Humboldt County are cost-burdened by their housing costs, meaning they spend more than 30% of their income on housing which leaves less money to cover other necessities like food, transportation, and health care. Similarly, this percentage and the degree of the cost-burden is more extreme for lower income residents.³ Attached is a fact sheet from the Housing and Transportation Affordability index for Humboldt County which includes data on a region's affordability based on housing and transportation costs showing that the county is largely car-dependent with limited access to public transportation.

Due to the high cost-burden of transportation for many residents of Humboldt County, especially lower income residents, and its nature as a large rural county, the importance of considering physical access to resources is a very high priority in terms of increasing opportunity and addressing inequity. Weighting VMT at 70% affirmatively furthers fair housing because transportation costs are a major barrier restricting access to employment, education, public services, and basic necessities such as healthcare and groceries. As described in the Staff report, VMT is a measurement used to capture the transportation necessity of a housing location. Weighting VMT higher helps to prioritize housing near jobs and transit to reduce driving time and reliance on cars. In Humboldt County, access to opportunity can be more accurately measured by weighting VMT higher because it more directly reflects the reality of our county's demographics.

Weighting VMT higher also furthers other statutory objectives including reducing emissions, protecting against sprawl, and promoting infill development. It furthers fair housing goals by balancing the value of planning for and building affordable housing in high opportunity areas with the reality that opportunity means little if it isn't accessible.

Alternative No. 3 weights VMT lower, and factors in an income parity adjustment for the low-income RHNA. This metric uses income data to assess the difference between an agency's housing stock in any income category versus the regional average to ensure housing diversity

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<https://data.census.gov/all?q=percent+of+individuals+with+a+disability+Humboldt+County+california>,

<https://data.census.gov/table/ACSST1Y2024.S1810?q=percent+of+individuals+with+a+disability+California>

² <https://htaindex.cnt.org/map/>

³

<https://letsgethealthy.ca.gov/goals/creating-healthy-communities/reducing-housing-cost-burden/>)

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and equity among all agencies. Both Alternative No. 2 and Alternative No. 3 factor in the opportunity score which consists of indexed variables that include incomes, property values, access to quality schools, and education levels—important factors to affirmatively further fair housing.

However, the opportunity score and the income parity adjustment alter the overall RHNA allocations based on the same notion of opportunity because higher income levels correspond with higher property value, education levels, and quality schools. Alternative No. 3's inclusion of both factors overemphasize income as a representation of opportunity, and diminish the opportunity benefit that VMT provides— a practical measurement of access to opportunity—because it weighs VMT lower. Alternative No. 2 affirmatively furthers fair housing and strikes a more appropriate balance tailored to our region.

LSNC regularly works with clients who struggle to access necessities such as food, healthcare, employment, and social services due to poverty and the lack of affordable transportation. We frequently work with vulnerable low income tenants who urgently need legal assistance to protect their home yet face transportation barriers to accessing emergency resources and attending appointments.

For these reasons we urge the Board to adopt Alternative No. 2 as its preferred methodology for RHNA allocation. If you have any follow-up questions or to discuss this matter, I can be reached at the contact information below.

Sincerely,


Rebecca Smith
Managing Attorney