

May 1, 2025

Humboldt County Planning Commissioners
825 Fifth Street
Board of Supervisors Chambers
Eureka, California
CC: Clerk of the Board, Megan Acevedo, John Ford

RE: Agenda Item 1, File #: 25-585, Humboldt County VMT Threshold Policy

Dear Humboldt County Planning Commissioners,

On behalf of the Environmental Protection Information Center (EPIC), please accept the following comments on agenda item #1, the proposed VMT policy contained in your packet for today.

EPIC supports a -15% threshold for VMT for residential and land use projects. However, in order for the calculation of -15% to be defensible, an appropriate baseline for existing VMT must be established. The current proposal to use a countywide baseline instead of local baselines is not defensible. The countywide average VMT was calculated to be 22.1 miles for residents and 14.7 miles for employees. But the amount of VMT across Humboldt County varies dramatically depending on where a project is located and so an average obscures those differences. In other words, assuming that communities in Myrtle town and Ferndale have the same baseline average VMT does not make sense.

In response to our partner CRTP's comments recommending dividing the county into different zones with different baselines to fix this problem, staff responded that deducing local baseline VMT was not possible and that that was why a countywide average had to be used. We respectfully disagree. The consulting firm Fehr & Peers developed a custom application based on Streetlight Data and built a [visualization tool called VMT+](#)¹ that predicts local baseline VMT data for all areas of the State of California. That version has data from 2019 and is free but the County could also pay for a more recent version from 2022. The amount of inaccuracy contained in a county wide average from 2023 is far greater than relying on outdated (2019) but far more localized data contained in VMT+ and so the county could develop more accurate, local baselines free of charge. **We strongly urge the Planning Commission to ask staff to use this more localized tool for calculating local VMT baselines rather than relying on the countywide average.**

However, if the Planning Commission feels this is not possible, we urge you to adopt staff recommendation #2: "The Planning Commission could decide to recommend that the Board of Supervisors adopt a baseline VMT that is based on the Countywide average VMT

¹ Available at

<https://fehrandpeers.maps.arcgis.com/apps/dashboards/e73ae2a501884a50ad2cae390fc6297b>

including the incorporated cities.” This would at least make the average more representative of the more urbanized areas of the county.

Thank you for your consideration,

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