



# COUNTY OF HUMBOLDT

For the meeting of: 8/21/2025

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File #: 25-906

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**To:** Planning Commission

**From:** Planning and Building Department

**Agenda Section:** Departmental Report

**SUBJECT:**

Humboldt Regional Climate Action Plan and CEQA GHG Emissions Thresholds.

Assessor Parcel Numbers (APN) 000-000-000

Record No.: LRP-2019-15593

Humboldt Countywide.

A Public Workshop on the Humboldt Regional Climate Action Plan (RCAP) and California Environmental Quality Act (CEQA) Greenhouse Gas (GHG) Emissions Thresholds. The RCAP includes strategies, measures, and actions addressing Countywide GHG emissions across unincorporated and incorporated Humboldt County and establishes a target of a 40 percent reduction in GHG emissions below 1990 levels by 2030 and a longer-term goal of carbon neutrality by 2045.

**RECOMMENDATION(S):**

That the Planning Commission take the following actions:

1. Request that Staff present the Staff Report; and
2. Receive public comment; and
3. Deliberate and comment on the RCAP (Attachment 1A, 1B, 1C, and 1D) and CEQA GHG Emissions Thresholds (Attachment 2); and
4. Provide comments on any areas of concern on the RCAP or CEQA GHG Emissions Thresholds.

**DISCUSSION:**

**Executive Summary:**

The RCAP is a regional plan to reduce Countywide GHG emissions that will serve the County and incorporated Cities. The plan was produced in partnership with the seven cities in the county (Arcata, Blue Lake, Eureka, Ferndale, Fortuna, Rio Del and Trinidad), the Redwood Coast Energy Authority,

Humboldt Transit Authority, Humboldt Waste Management Authority (HWMA) and the Humboldt Area Council of Governments. This is very much a regional partnership where county staff served as facilitating the process. The RCAP includes a Countywide 2022 GHG emissions inventory, forecasts for future GHG emissions, a 1990 GHG emissions back cast, and strategies, measures, and actions aimed at reducing Countywide GHG emissions 40 percent below 1990 levels by 2030, and carbon neutrality by 2045. The 2030 GHG emissions target was selected to be consistent with State Bill (SB) 32 State emissions targets and the CEQA Guidelines for a qualified GHG emissions reduction strategy, and to be achievable by the actions identified in the RCAP. To achieve the 2030 GHG emissions reduction target, the RCAP contains 30 measures related to carbon-free energy, building energy use, transportation, waste, water/wastewater, carbon sequestration, and refrigerants. A unique feature of the RCAP is the creation of a Regional Climate Committee made of representatives from all partners to use the collective strength to obtain financing and achieve the objectives of the RCAP. The current thought is that HACOOG would serve as the RCC. For the plan to be effective there should be one solidary plan established and implemented by all local jurisdictions invested in the RCAP.

CEQA GHG Emissions Thresholds are also being presented for future adoption, which will be used to assess future development projects and their GHG emissions impacts under CEQA. A Final Environmental Impact Report (FEIR) is being prepared to assess the potential impacts of the RCAP and GHG Emissions Thresholds, which will be brought to the Planning Commission (PC) during the public hearing. This workshop is intended to provide the Planning Commission with an understanding of the RCAP, to understand the concerns raised during the EIR review process and to provide the commission with the ability to ask questions and provide comments on the RCAP and CEQA GHG Emissions Thresholds to identify any areas of major concern.

### **Background:**

Policy AQ-P9 of the Air Quality Element in the General Plan calls for the development of a “multi-jurisdictional Climate Action Plan (CAP) to achieve reductions in GHG emissions consistent with the state Global Warming Solutions Act (Assembly Bill 32) and subsequent implementing legislation and regulations.” Implementation measure AQ-IM3 further states “develop and implement a CAP that effectively mitigates the carbon emissions attributable to this Plan, consistent with the requirements of the State Global Warming Solutions Act and subsequent implementing legislation and regulations.” The RCAP is a mitigation measure for the 2017 General Plan update.

The County, Redwood Coast Energy Authority (RCEA) and the incorporated Cities of Arcata, Blue Lake, Eureka, Fortuna, Ferndale, Rio Dell, and Trinidad began working on a multi-jurisdictional CAP in 2019, which later included collaboration with Humboldt County Association of Governments (HCAOG), Humboldt Transit Authority (HTA), and Humboldt Waste Management Authority (HWMA), referred to herein as the “Working Group.” The RCAP has gone through several drafts to meet the State requirements for a CEQA-qualified GHG emissions reduction plan under CEQA Guidelines Section 15183.5 and to be eligible for the funding that was received from the California Department of Housing and Community Development (HCD) Local Early Action Planning (LEAP) Grants Program.

Rincon Consultants was hired to develop a regional CEQA-qualified CAP, to consult on CEQA GHG emissions thresholds to be adopted, and to produce the Environmental Impact Report (EIR) for the RCAP and CEQA GHG emissions thresholds.

Preparation of the RCAP included interviews with the Working Group to refine measures and actions aimed at GHG emissions reductions. There was also a brief community survey that looked at community priorities. A Draft RCAP was developed with 29 measures. It was released for 30-day public review on August 14, 2024, and a public meeting was held to discuss the Draft RCAP on September 10, 2024. Several public comments were received on the Draft RCAP which were discussed and considered at the Board of Supervisor's (BOS) hearing on October 22, 2024. An update to the Draft RCAP was prepared to include BOS requested changes, which included one additional measure to address emissions from refrigerants. This draft of the RCAP served as the project for preparation of the DEIR.

A Notice of Preparation for the RCAP EIR was filed with the state clearinghouse on August 30, 2024. A Notice of Completion was filed for the Draft EIR (DEIR) on February 7, 2025, with the State Clearinghouse (SCH#2024081319) which initiated a 45-day public review period from February 18, 2025, to April 5, 2025. A public scoping meeting was held on September 17, 2024, and a public meeting was held to discuss the DEIR on March 18, 2025. A total of 5 comment letters were received (Attachment 3) on the DEIR and minor modifications were made to the RCAP through the consideration of comments. All proposed changes to be made to the RCAP in response to comments are shown in underline and strikethrough text in Attachment 1A.

The regional approach to the RCAP includes the establishment of a Regional Climate Committee (RCC), which is crucial to the success of achieving GHG emission reduction targets. The RCC will foster the collaboration and coordination among the region to implement the RCAP and will be responsible for tracking the progress of the plan. There is great potential that the RCC will be housed at HCAOG and support for this has been expressed by the local community and the BOS.

### **The Humboldt RCAP**

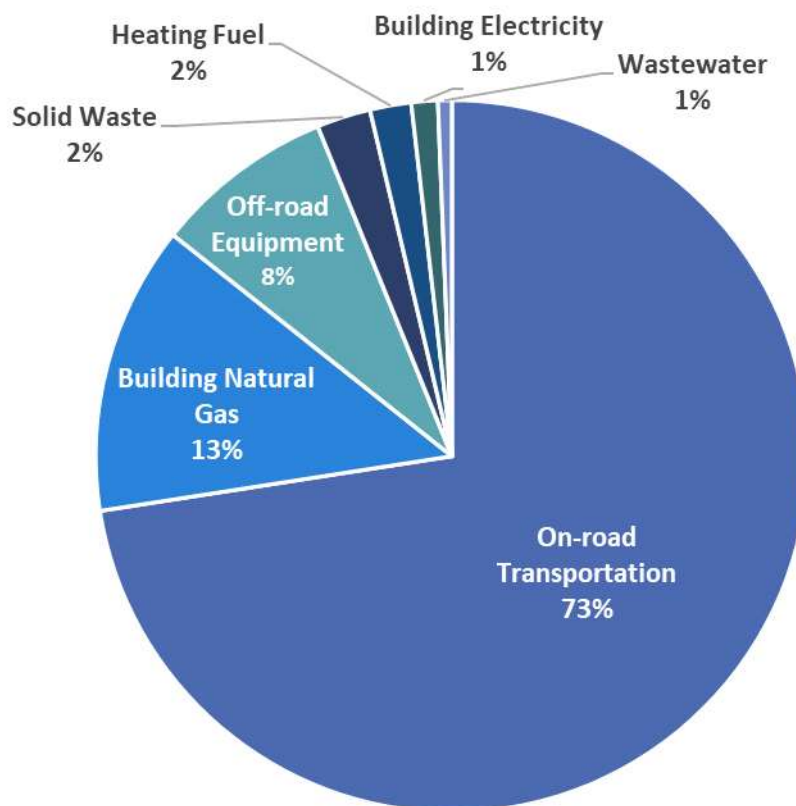
The RCAP includes a Countywide GHG emissions inventory for the year 2022. This inventory was then used through a process called back casting to develop a 1990 baseline of local GHG emissions. From that baseline two GHG emissions forecasts were prepared including a business-as-usual (BAU) scenario and a legislative adjusted (adjusted) scenario for 2030, 2035, 2040, and 2045. The adjusted scenario accounts for how currently adopted State legislation would reduce GHG emissions from the BAU scenario. Details on the calculations and methodology for the GHG inventory, forecasts, and reduction targets can be found in Appendix B of the RCAP, *Greenhouse Gas Inventory, Forecast, and Targets Report* (Attachment 1C). The RCAP identifies strategies, measures, and actions for achieving a 40 percent reduction in GHG emissions below 1990 levels by 2030 and carbon neutrality by 2045. To achieve the 2030 GHG emissions reduction target, the Working Group has developed 30 measures related to carbon-free energy, building energy use, transportation, waste, water/wastewater, carbon

sequestration, and refrigerants. Details on the calculations and methodology for the reductions in GHG emissions attributed to each measure can be found in Appendix C of the RCAP, *Greenhouse Gas Emissions Measure Reduction Quantification and Substantial Evidence Report* (Attachment 1D).

### 2022 GHG Inventory

The 2022 GHG Inventory includes local GHG emissions associated to sectors that local governments have authority or influence over (building energy, transportation, solid waste, water and wastewater). Emissions from industrial point source discharge have been excluded from the inventory due to lack of local jurisdictional control over these emission sources and because industrial point sources are regulated by the State Cap-and-Trade program and local air district. However, electricity and natural gas consumption from industrial operations are included in the inventory as most facilities in the area are not subject to regulations under the Cap-and-Trade program and local government have some influence over the energy use through zoning and building codes. The inventory found that in 2022, Humboldt emitted 1,531,167 metric tons of carbon dioxide equivalents (MT CO<sub>2</sub>e). Figure 1 below shows the share of total emissions in 2022 broken out by sector.

**Figure 1 - Humboldt Region GHG Emissions for 2022**

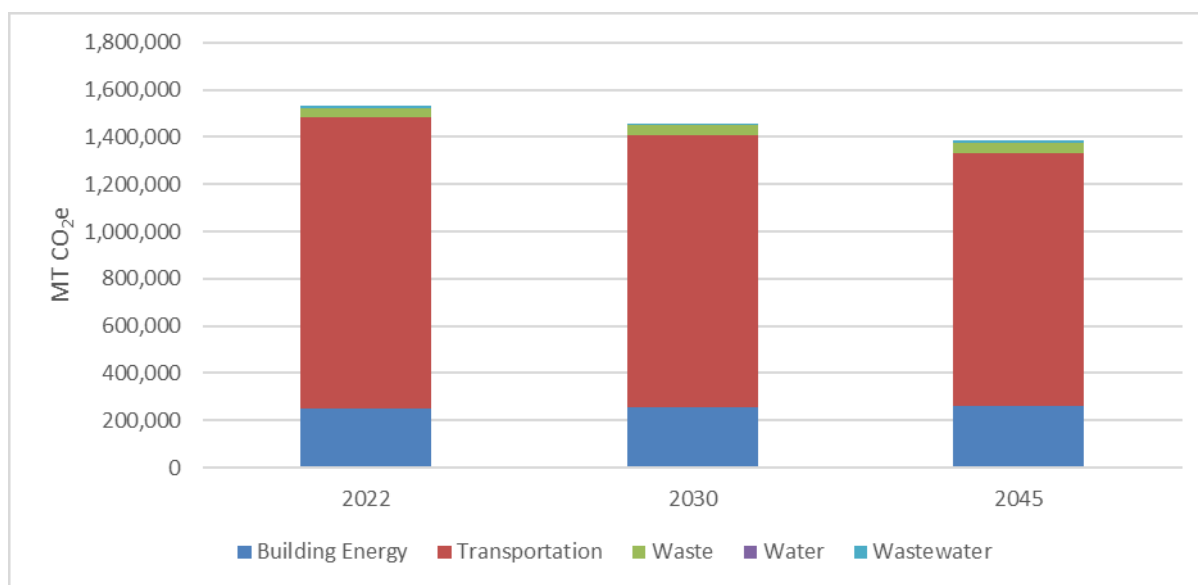


### RCAP GHG Emissions Forecasts and Reduction Targets

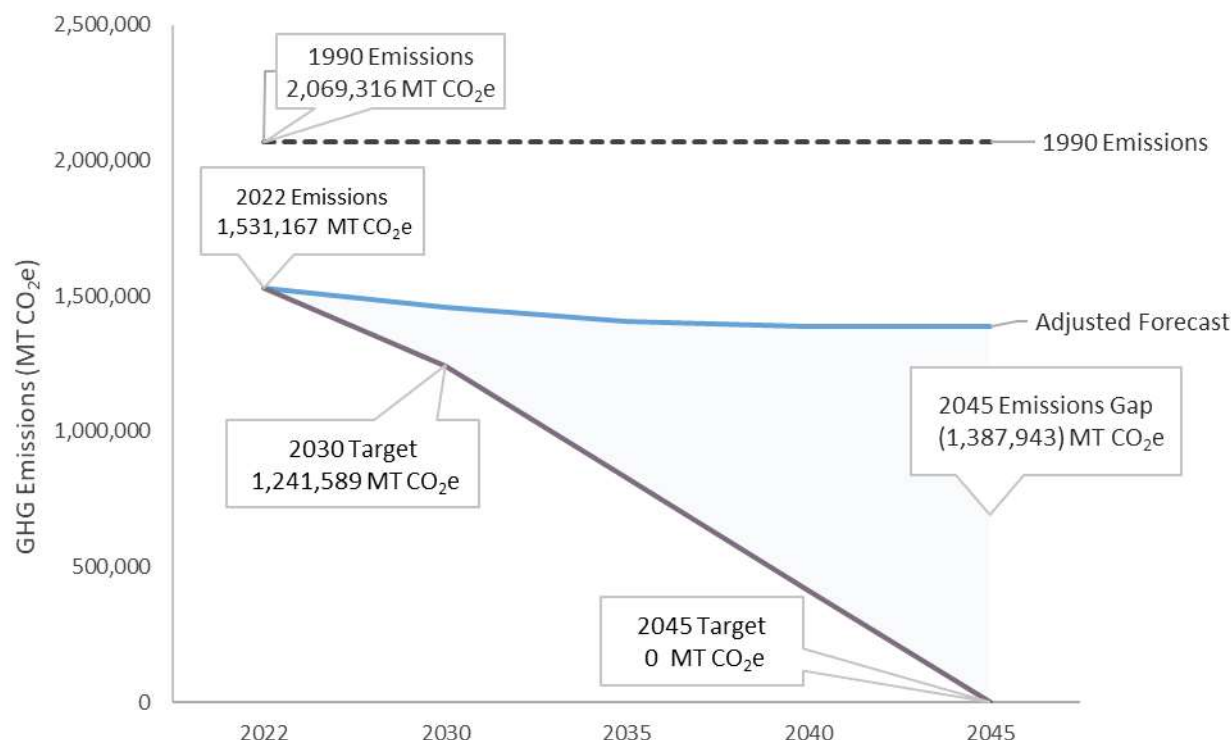
Based on current community GHG emissions identified in the 2022 inventory and projected

population and employment change in the region, future Countywide GHG emissions were projected through 2045. A back cast for 1990 GHG emissions was generated along with forecasted emissions for BAU and adjusted scenarios in 2030, 2035, 2040, and 2045. This information allowed for the calculation of local GHG emissions reductions needed to meet the State's goal of 40% below 1990 levels by 2030 and carbon neutrality by 2045. Detailed information on the calculations and methodology used for generating the GHG emissions reduction targets is included in Appendix B of the RCAP, *Greenhouse Gas Inventory, Forecast, and Targets Report* (Attachment 1C). The adjusted forecast projected emissions to be 1,459,598 MT CO<sub>2</sub>e in 2030 and 1,387,943 MT CO<sub>2</sub>e in 2045. The adjusted forecasted emissions by sector for 2030 and 2045 are shown in Figure 2 below.

**Figure 2 - Humboldt Forecasted GHG Emissions by Sector for 2022, 2030 and 2045**



California has established Statewide GHG reduction goals for 2030 and 2045 that are relative to a 1990 baseline emissions level. The Humboldt region does not have a 1990 GHG emissions inventory to develop reduction targets from. However, 1990 GHG emissions can be estimated for the community relative to the 2022 inventory using a State-level emissions change metric. 1990 emission levels for Humboldt were calculated following State-recommended procedure which assumes that the region follows the State's trend for GHG emission changes over time. It is estimated that Countywide GHG emission levels were 2,069,316 MT CO<sub>2</sub>e in 1990. This results in an emission target of 1,241,589 MT CO<sub>2</sub>e by 2030 and 0 MT CO<sub>2</sub>e by 2045. The corresponding GHG emissions target pathway over the coming decades is illustrated in Figure 3 below. The emissions gap between Humboldt GHG emission forecast and the emission targets is the quantity of GHG emissions that the region is collectively responsible for reducing with regional actions.

**Figure 3 - Humboldt GHG Emission Reduction Targets**

The measures and actions in the RCAP will provide the region with the GHG emissions reductions necessary to achieve the 2030 target and support progress towards the 2045 target, as shown in the Table 1 below. However, the 2045 GHG emissions reductions quantified in the RCAP are not enough to achieve the goal of carbon neutrality by 2045. Future updates to the Humboldt RCAP measures and actions is required to close the remaining gap to achieve the carbon neutrality target which will occur in 2030.

**Table 1 - Humboldt GHG Emission Reduction Pathway**

| Target/Forecast                                 | 2030 GHG Emissions (MT CO <sub>2</sub> e) | 2045 GHG Emissions (MT CO <sub>2</sub> e) |
|-------------------------------------------------|-------------------------------------------|-------------------------------------------|
| Adjusted Forecast                               | 1,459,598                                 | 1,387,943                                 |
| Reductions from Full Implementation of Measures | 219,446                                   | 1,228,128                                 |
| GHG Emissions after Measure Reductions          | 1,240,151                                 | 159,815                                   |
| Climate Action Targets                          | 1,241,589                                 | 0                                         |
| Target Anticipated to be Met?                   | Yes                                       | Substantial progress demonstrated         |

### RCAP Structure

The RCAP is structured with strategies, measures and actions to reduce local GHG emissions. Strategies within the RCAP describe an overall approach for reducing GHG emissions within a given sector and there are a total of twelve strategies identified. Each strategy has measures, which are long

-range policies that were established by the Working Group to ultimately reduce GHG emissions in line with State targets.

Some measures are further separated into urban and rural measures to acknowledge the difference of existing infrastructure in urban vs. rural areas and the limitations for potential GHG emission reducing policies. Urban areas are more densely developed with greater access to energy, water/wastewater, waste and transportation infrastructure while rural areas represent dispersed communities with limited access to energy, water/wastewater, waste and transportation infrastructure. Urban areas are defined by the 2020 US Census Bureau as contiguous block groups with at least 5,000 people or 2,000 housing units. Urban areas include the Cities of Eureka, Arcata and Fortuna, and unincorporated areas of McKinleyville, Bayside, Cutten, Myrtle town, Manila, Samoa, Ridgewood, King Salmon, Fields Landing and areas around Fortuna.

Measures can either be quantitative, resulting in direct and measurable GHG emissions reductions which have been quantified, or they can be supportive and have not been quantified. Although supportive measures are not quantified, they are still critical to the overall success of the RCAP as they provide support for the quantitative measures. Measures are further separated into actions that identify the specific programs, policies, funding pathways, and other specific commitments that will be implemented within the region.

The following strategies and measures are included in the RCAP. (A more detailed list of actions for each measure can be found in Section 4.5 *Measures*, Table 32 of the RCAP [Attachment 1].):

\*It should be noted that California Assembly Bill (AB) 306 was passed in early July 2025, which places a moratorium on the adoption or modification of certain residential building standards, including those impacting energy consumption, from October 1, 2025, to June 1, 2031. This will affect the County and incorporated Cities ability to implement some of the actions within measures of the RCAP that include adopting or enforcing stricter building codes than current standard California Building Codes for existing and new residential buildings. Measures affected by this Bill show an \* below.

**Strategy 1 - Cornerstone: Development of a regional climate coalition**

Measure C-1 (Supportive/Critical): *Establish a Regional Climate Committee comprised of representatives from each jurisdiction, HTA, HCAOG, HWMA, and RCEA to be administered by the County.*

**Strategy 2 - Building Energy: Increase carbon-free electricity**

Measure BE-1 (Quantitative): *By 2030, source 90% of grid-supplied electricity from renewable and carbon-free sources.*

Measure BE-2 (Supportive): *Increase the development of micro-grids and energy storage across the region to support RCEA's RePower Humboldt goals of enhancing grid capacity*

*and facilitating the electrification of buildings and transportation.*

*Measure BE-8 (Supportive): Advocate for Offshore Wind developers to fund transmission infrastructure and work with PG&E, the California Public Utilities Commission (CPUC), and other related agencies to build electrical transmission infrastructure to supply Humboldt with energy produced by the future offshore wind projects which will increase regional supply and resilience.*

### **Strategy 3 - Building Energy: Decarbonization of existing construction**

*\*Measure BE-3 Urban (Quantitative): Reduce existing residential building natural gas consumption by 4% by 2030 and 74% by 2045.*

*\*Measure BE-3 Rural (Supportive): Reduce existing residential fossil-fuel consumption in households not connected to natural gas infrastructure by 2% by 2030.*

*Measure BE-4 (Quantitative): Reduce existing nonresidential building natural gas consumption by 5% by 2030 and 79% by 2045.*

*Measure BE-7 (Supportive): Decarbonize 30% of municipal buildings and facilities by 2030.*

### **Strategy 4 - Building Energy: Decarbonization of new construction**

*\*Measure BE-5 (Quantitative): Decarbonize 95% of new residential building construction by 2027.*

*Measure BE-6 (Quantitative): Decarbonize 95% of new nonresidential building construction by 2027.*

### **Strategy 5 - Transportation: Shift driving to walking and biking**

*Measure T-1 Urban (Quantitative): Implement programs, such as those identified in HCAOG's Regional Transportation Plan (RTP) to increase the mode share of active transportation in urbanized areas from 9% to 12% by 2030, thereby achieving a regional active transportation mode share of 8%.*

*Measure T-1 Rural (Quantitative): Implement programs, such as those identified in HCAOGs RTP that increase access to safe active transportation to increase the mode share of active transportation in rural areas from 5% to 6% by 2030, thereby achieving a regional active transportation mode share of 9%*

### **Strategy 6 - Transportation: Shift driving to public transit or car-share**

*Measure T-2 Urban (Quantitative): Expand the public transit network in support of*

*HCAOGs RTP to increase public transit mode share from 2% to 20% public transit mode share in urbanized areas to achieve a regional 13% public transit mode share by 2030.*

*Measure T-2 Rural (Quantitative): Develop a robust public transit network in support of HCAOGs RTP to increase public transit mode share from 1% to 10% in rural areas and achieve a regional 13% public transit mode share by 2030.*

*Measure T-4 (Supportive): Develop and implement regional mobility hubs and ZEV charge programs to support mode shift from single occupancy vehicles.*

**Strategy 7 - Transportation: Shift land use to reduce vehicle miles traveled (VMT)**

*Measure T-3 Urban (Supportive): Reduce regional VMT by increasing mixed-use development in infill priority areas.*

*Measure T-5 (Supportive): Require commercial and industrial employers with 25 employees or more to develop a Transportation Demand Management Plan.*

**Strategy 8 - Transportation: Increase zero-emission vehicle adoption**

*Measure T-6 (Quantitative): Decarbonize 15% of passenger vehicle miles traveled by 2030 and 100% by 2045 through increased adoption of low and zero-emission vehicles and development of a regional electric vehicle charging and hydrogen fueling network.*

*Measure T-7 (Quantitative): Increase commercial zero-emission vehicle use and adoption to 10% by 2030 and 100% by 2045 through a regional charging network and development of hydrogen hubs.*

*Measure T-8: (Quantitative): Electrify or otherwise decarbonize 12% of applicable small off-road engines (SOREs) off-road equipment by 2030 and 100% by 2045 and replace fossil diesel consumption with renewable diesel in 55% of applicable large diesel in alignment with Executive Order (EO) N-79-20 by 2030.*

*Measure T-9 (Supportive): Establish Humboldt as a pilot program for the decarbonization of the transportation sector to help drive State and philanthropic investment throughout Humboldt.*

*Measure T-10 (Supportive): Work with the State and renewable fuel industry to establish renewable fuel network within Humboldt thereby funding new green industry and job growth to support the decarbonization of the transportation sector.*

*Measure T-11 (Supportive): Lead by example and electrify or otherwise decarbonize 50% of municipal fleets by 2030 in alignment with the State's Advanced Clean Fleet Rule.*

**Strategy 9 - Solid Waste: Reduce organic waste**

Measure SW-1 (Quantitative): *Establish a local waste separation facility and organics management to be able to reduce waste sent to landfills by 75% by 2030. Reduce GHG emissions by limiting truck trips required to ship waste out of the County and import compost from out of the County.*

**Strategy 10 - Water & Wastewater: Conserve water and reduce wastewater emissions**

Measure WW-1 (Supportive): *Expand regional opportunities for implementation of wastewater decarbonization technologies such as anaerobic digesters to reduce GHGs and produce renewable fuel sources.*

Measure WW-2 (Supportive): *Reduce per capita potable water consumption by 15% by 2030.*

**Strategy 11 - Carbon Sequestration: Increase carbon sequestration**

Measure CS-1 (Supportive): *Research and implement feasible carbon sequestration technology opportunities to support growth and expansion of green jobs industry within the region.*

Measure CS-2 (Quantitative): *Offset fossil-based emissions and increase carbon sequestration in the community by achieving SB 1383 procurement requirements (0.08 tons recovered organic waste per person) by 2030.*

Measure CS-3 (Supportive): *Develop a Countywide Natural and Working Lands GHG Inventory baseline by 2027 to better understand the existing and future GHG sequestration and help obtain resources to protect and increase natural carbon sequestration occurring in the region as well as promote biodiverse forests and wetlands resistant to wildfire.*

**Strategy 12 - Refrigerants: Explore reduction in harmful refrigerant release**

Measure R-1 (Supportive): *Prepare a baseline analysis of the volume of Hydrofluorocarbons released into the atmosphere and evaluate whether these releases are being adequately addressed by CARB or whether the County should supplement the work of CARB.*

**RCAP Implementation and Monitoring**

Measures will be implemented in phases and progress reports will be prepared annually by the Regional Climate Committees Program Manager, to be presented to the RCC and ultimately to all participating agencies, to measure progress and establish accountability for achieving RCAP GHG emissions reduction goals. The progress reports will include the preparation of a current Countywide

GHG emissions inventory and status update on implementation of the RCAP measures and actions. Tracking implementation of the plan in conjunction with the inventory updates will demonstrate the progress the region is making in achieving 2030 goals. If the measures and actions identified in the RCAP for meeting the 2030 goals are not implemented or if the annual progress report indicates that the region is off-track from achieving the 2030 goal, the RCAP will be updated to include additional actions or revised actions to meet the 2030 goals.

#### *CEQA Qualified Status for Streamlining and Tiering*

The RCAP has been prepared in accordance with CEQA Guidelines Section 15183.5(b) which allows the streamlining of GHG emissions analysis for projects requiring CEQA that show consistency with the measures in the RCAP. Projects that are consistent with the RCAP measures (specifically measures applicable to new development) would be presumed to have a less than significant impact to GHG emissions and would not require further analysis. A CEQA GHG Emissions Streamlining Checklist has been developed for this analysis (Attachment 4), which is an internal planning tool that will be valid until 2030 to assess project consistency with the RCAP through a list of questions and is not a policy document that requires review or comments. If a project cannot show consistency with the RCAP, further CEQA GHG emissions analysis is required to determine the level of impact.

The CEQA-qualified status for the RCAP also allows the tiering of future RCAP projects requiring full CEQA analysis (projects that specifically implement the RCAP, such as a large-scale organic waste processing facility, renewable energy projects, renewable fuel production projects and improvements to electric grid infrastructure) under CEQA Guidelines Section 15183.5(a). Tiering is defined under CEQA Guidelines Section 15152(a) as “using the analysis of general matters contained in a broader EIR with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating on later EIR or negative declaration solely on the issues specific to the later project.” Future RCAP projects that tier from the RCAP EIR would require subsequent CEQA analysis and include site-specific impacts and mitigation measures.

#### ***CEQA GHG Emissions Thresholds***

The County proposes to adopt quantitative CEQA GHG emissions thresholds for use in evaluating whether a future plan or project’s GHG emissions would result in a potentially significant environmental impact under CEQA. The proposed thresholds would be applicable to projects with a pre-2030 buildout or operational year. Rincon Consultants prepared a *CEQA GHG Emissions Thresholds and Guidance Report* (Attachment 2), which establishes urban and rural quantitative thresholds for GHG emissions. The thresholds were developed using guidance provided by the Association of Environmental Professionals (AEP) for establishing GHG emissions efficiency thresholds using the local GHG inventory and demographic forecasts that were established in the RCAP. Explained in Section 5.1 *Thresholds Calculation Methodology* of the *CEQA GHG Emissions Thresholds and Guidance Report*, efficiency thresholds are expressed as a per-person metric (e.g., per resident, per employee, or per service population), and are calculated by dividing the allowable GHG emissions inventory for a selected year by the number of residents, full-time employees, or service population in

that year. Proposed GHG Emissions Thresholds were decided on to keep the County and incorporated Cities on track of meeting 2030 and 2045 targets, and are shown in Table 2 below.

**Table 9 Humboldt Adjusted Urban and Rural GHG Emissions Thresholds**

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>2030 New Development</b> |                            |                                  |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|----------------------------|----------------------------------|
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>New Residential</b>      | <b>New Non-Residential</b> | <b>New Mixed-Use<sup>1</sup></b> |
| <b>Urban</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                             |                            |                                  |
| GHG Efficiency Threshold<br>(MT CO <sub>2</sub> e per demographic<br>metric per year)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 1.81 per resident           | 4.06 per employee          | 2.60 service person              |
| <b>Rural</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                             |                            |                                  |
| GHG Efficiency Threshold<br>(MT CO <sub>2</sub> e per demographic<br>metric per year)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 1.83 per resident           | 4.08 per employee          | 2.54 service person              |
| Notes: MT CO <sub>2</sub> e = metric tons of carbon dioxide equivalent <sup>1</sup> GHG emissions from new mixed-use development would count against the total remaining GHG emissions budget for both new residential and new non-residential development rather than as a function of the number of new service people expected in 2030. This is double counting. <sup>2</sup> The service population is equal to the residential population plus the number of employees.<br>Source: Humboldt County CEQA GHG Emissions Thresholds and Guidance Report Appendix B, CEQA GHG Thresholds Calculation |                             |                            |                                  |

As stated in the *CEQA GHG Emissions Thresholds and Guidance Report*, “If a plan or project’s emissions do not exceed the applicable threshold, then it is considered consistent with the RCAP and its GHG emissions impacts (both project- and cumulative-level) would not result in a cumulatively considerable impact related to GHG emissions and climate change and would, therefore, be considered less than significant. If a plan’s or project’s emissions exceed the applicable threshold, then mitigation measures must be identified, and respective GHG emissions reduction calculations included within the respective CEQA review document in order to reduce plan or project GHG emissions to at or below the applicable threshold level. These thresholds are applicable to the following plan and project types proposed in Humboldt that are subject to CEQA (e.g., projects requiring discretionary approvals) and that do not qualify for a categorical or statutory exemption.” Both the RCAP and quantitative thresholds will be applicable for the assessment of projects with pre-2030 buildout or operational years, and will be updated prior to 2030.

### **Draft EIR (DEIR) for the RCAP and GHG Emissions Thresholds**

A DEIR for the RCAP and proposed CEQA GHG Emissions Thresholds was prepared, filed with the State Clearinghouse (SCH#2024081319) and released for 45-day public review from February 18, 2025, to April 5, 2025. The DEIR identified future projects to implement the RCAP that may tier from the RCAP EIR per CEQA Guidelines Section 15183.5(a) and found potentially significant and unavoidable impacts related to aesthetics, air quality, noise, utilities/service systems, cultural resources and Tribal cultural resources, and biological, agriculture and forestry resources. A total of five comment letters were received on the DEIR, included in Attachment 3, and minor modifications were made to the RCAP

through the consideration of these comments. Many of the comments, however, were not on the DEIR, but on the RCAP itself. The major comments received on the DEIR are listed below.

- Concern regarding tiering vs streamlining allowed under the RCAP and potential to approved future projects without full environmental analysis
- Concern that the CEQA GHG Emissions Streamlining Checklist was not available with the DEIR
- Concerns regarding biofuels such as biodiesel and renewable diesel, their different applicability's, their use as transitional fuels to decarbonize sectors in the RCAP, and concern about the potential feedstock and manufacturing processes that could result from biofuel processing facilities

As discussed above, the CEQA GHG Emissions Streamlining Checklist is not a policy document and does not require review or adoption. However, as this has been a point of contention in public comments received on the RCAP DEIR, this has been made available in this Staff Report and is included as Attachment 4. A Final Environmental Impact Report (FEIR) is being completed and will be provided and discussed at Planning Commission hearing. A more detailed outline of comments received with responses will be included in the subsequent PC hearing Staff Report.

#### **Updates to RCAP in Response to Comments**

- Added definition for biofuel
- Added definition for biodiesel
- Added definition for renewable diesel
- Correct language under Section 1.2 *CEQA GHG Emissions Analysis Streamlining* to be accurate to the intent of CEQA Guidelines Section 15183.5(b) specific to streamlining GHG emissions
- Updated the "Urban Areas" map to reflect the update to the US Census Bureau definition of areas containing a minimum of 5,000 population or 2,000 housing units
- Updated language to the measure and actions of BE-8 in the RCAP and appendices, as requested by the Harbor District
- Revised Measure T-3 to be an urban measure and updated language, as the baseline connectivity score identified is not available Countywide or completely established in urban areas

All proposed changes to be made to the RCAP in response to comments are shown in underline and strikethrough text in Attachment 1A.

#### **OTHER AGENCY INVOLVEMENT:**

The Humboldt Regional Climate Action Plan (RCAP) is a regional plan which requires the involvement of the incorporated cities of Arcata, Blue Lake, Eureka, Fortuna, Ferndale, Trinidad, and Rio Dell, as well as the Humboldt County Association of Governments (HCAOG), the Redwood Coast Energy

Authority (RCEA), the Humboldt Transit Authority (HTA), and the Humboldt Waste Management Authority (HWMA). The RCAP and measures were developed through meetings, interviews, and review from all partners of the RCAP.

ATTACHMENTS:

- 1.A Humboldt RCAP Updated August 2025
- 1.B RCAP Appendix A - Climate Regulatory Context
- 1.C RCAP Appendix B - GHG Emissions Inventory, Forecast, and Targets Report Updated August 2025
- 1.D RCAP Appendix C - GHG Emissions Measure Reduction Quantification and Substantial Evidence Report Updated August 2025
- 2 CEQA GHG Emissions Thresholds and Guidance Report
- 3 Comments Received on DEIR
- 4 CEQA GHG Emissions Streamlining Checklist

Please contact Megan Acevedo, Associate Planner, at [Macevedo@co.humboldt.ca.us](mailto:Macevedo@co.humboldt.ca.us) or 707-441-2634 if you have questions about this item.