



COUNTY OF HUMBOLDT

For the meeting of: 12/16/2025

File #: 25-1357

To: Board of Supervisors

From: Planning and Building Department

Agenda Section: Time Certain Matter

Vote Requirement: Majority

SUBJECT:

10:00 AM - Humboldt Regional Climate Action Plan and CEQA GHG Emissions Thresholds
Assessor Parcel Numbers (APN) 000-000-000
Record No. LRP-2019-15593
Humboldt Countywide

Approval of 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% reduction in GHG emissions below 1990 levels by 2030 and an 85% reduction and carbon neutrality by 2045. CEQA GHG Emissions Thresholds will be applicable to new development projects that require CEQA review and with a pre-2030 buildout or operational year

RECOMMENDATION(S):

That the Board of Supervisors:

1. Open the public hearing and receive the staff report, testimony by appellant, and testimony from the public; and
2. Close the public comment portion of the public hearing; and
3. Adopt the resolution (Attachment 1) in which the Board makes the required findings for certification of the EIR for the RCAP and CEQA GHG Emissions Thresholds, certifies the FEIR for the RCAP and CEQA GHG Emissions Thresholds, adopts the Statement of Overriding Considerations, and adopts the Mitigation Monitoring and Reporting Program (Attachment 5); and
4. Adopt the resolution (Attachment 6) in which the Board makes the required findings that the RCAP (Attachments 7, 7A, 7B, and 7C) is consistent with applicable policies, laws and regulations and adopts the RCAP; and
5. Adopt the Resolution (Attachment 8) in which the Board makes findings that the CEQA GHG Emissions Thresholds and Guidance Report (Attachment 9) are consistent with applicable policies, laws and regulations, and adopts the CEQA GHG Emissions Thresholds and Guidance Report with Thresholds at a level 25% below the level which would be achieved in the RCAP; and
6. Close the public hearing.

STRATEGIC PLAN:

This action supports the following areas of your Board's Strategic Plan.

Area of Focus: Sustainable Natural Resources & Infrastructure Stewardship
Strategic Plan Category: 5001 - Enhance climate adaptation landscapes and communities

DISCUSSION:

Executive Summary:

The Board of Supervisors is being asked to consider adoption of the RCAP, CEQA GHG Emissions Thresholds Guidance Report and to certify the EIR prepared for adoption of these policy documents. The RCAP is a regional plan to reduce Countywide GHG emissions within the county and incorporated cities. The plan and CEQA GHG Emissions Thresholds were produced in partnership with the seven cities of Arcata, Blue Lake, Eureka, Ferndale, Fortuna, Rio Del and Trinidad, and the Redwood Coast Energy Authority (RCEA), Humboldt Transit Authority (HTA), Humboldt Waste Management Authority (HWMA) and Humboldt County Association of Governments (HCAOG). The county facilitated preparation of the RCAP, FEIR for the RCAP and the CEQA GHG Emissions Thresholds and will be the first agency to take action to certify the EIR, adopt the RCAP, and adopt the CEQA GHG Emissions Thresholds and Guidance Report. Each of the seven cities will then adopt the plan and thresholds. The Planning Commission recommended the Board of Supervisors certify the EIR and adopt the RCAP and CEQA Thresholds with a vote of 3-2. An important element of the RCAP is the creation of the Regional Climate Committee that would be responsible for implementation of the regional plan. HCAOG is viewed as a likely candidate to fulfill this role. It is likely that each jurisdiction participating will need to share in the cost of staffing this role.

Background:

General Plan Policy AQ-P9 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.”* Adoption of the RCAP would fulfill the 2017 General Plan ambition to create a multi-jurisdictional Climate Action Plan.

The county, 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 HCAOG, HTA, and HWMA, referred to herein as the “Working Group.” Preparation of the RCAP included interviews with and review from members of the Working Group to refine measures and actions aimed at countywide GHG emissions reductions. There was also a brief community survey that looked at community priorities for areas for the RCAP to address. A Draft RCAP was developed with 29 measures and released for 30-day public review on Aug. 14, 2024, and a public meeting was held on Sept. 10, 2024. Several public comments were received on the Draft RCAP which were discussed and considered at the BOS hearing on Oct. 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. The updated draft of the RCAP with 30 measures served as the project for preparation of the Draft EIR (DEIR).

A Notice of Preparation for the RCAP EIR was filed with the State Clearinghouse on Aug. 30, 2024, and a Notice of Completion was filed (SCH#2024081319) for the DEIR on Feb. 7, 2025, which initiated a 45-day public review period from Feb. 18, 2025, to April 5, 2025. A public scoping meeting was held on Sept. 17, 2024, and a public meeting was held to discuss the DEIR on March 18, 2025. A total of five comment letters were received on the DEIR, which are included in the FEIR, and minor modifications were made to the RCAP through consideration of these comments. A FEIR (Attachment 3) has been prepared to assess the potential impacts of implementing the RCAP and CEQA GHG Emissions Thresholds (SCH#2024081319) and was made available to the public on Oct. 3, 2025.

A public workshop was held at the PC hearing on Aug. 7, 2025, to discuss the RCAP. The Staff Report for the public workshop is included as Attachment 11. A public hearing was held by the Planning Commission on Oct. 16, 2025, to deliberate on the FEIR, RCAP, and proposed CEQA GHG Emissions Thresholds. The PC voted 3-to-2 recommending that the Board of Supervisors certify the EIR for the RCAP and CEQA GHG Emissions Thresholds with minor modifications, adopt the Mitigation Monitoring and Reporting Program, adopt the RCAP and CEQA GHG Emissions Thresholds with a few changes.

The following minor changes have been made in response to requests from the PC on October 16, 2025:

- In the RCAP, added action “j” under Measure C-1 to include that the Regional Climate Committee shall communicate and collaborate with the local tribes on their efforts to reduce GHG emissions.

- Clarification in EIR Resolution, Evidence “g” under Finding 5 to include “through 2030.”
- Clarification in Resolution for the RCAP, Evidence “e” under Finding 3 to include more specific language for RCAP update in 2030.
- Added Caltrans to Action T-1e Urban to be a part of prioritizing connectivity projects with HCAOG.
- Recommended the Thresholds be adopted at 75% of the RCAP per capita level, but they would like the Board to consider the alternatives to 75% (50% or 100% further discussed below under CEQA GHG Emissions Thresholds).

The Humboldt RCAP:

The RCAP is a “Qualified Climate Action Plan” in that it meets the goals of the state, includes substantial evidence to support this and has been evaluated in an EIR which allows it to be used for CEQA Streamlining. The plan achieves the SB 32 goal of a 40% reduction in GHG emissions by 2030 and establishes a framework to achieve an 85% reduction in GHG and carbon neutrality by 2045 as required by AB 1279.

The first step in calculating a reduction in GHG emissions is to calculate the baseline from which emissions will be reduced. To develop an appropriate baseline of GHG emissions, a countywide 2022 GHG emissions inventory was completed. This information was used with a state-approved methodology to calculate and back-cast 1990 GHG emissions. The RCAP establishes Strategies, Measures, and Actions aimed at reducing countywide GHG emissions. The 2030 GHG emissions target is consistent with the CEQA Guidelines Section 15183.5(b) for a qualified GHG emissions reduction plan. The RCAP contains 30 measures related to carbon-free energy, building energy use, transportation, waste, water/wastewater, carbon sequestration, and refrigerants. A cornerstone measure of the RCAP is creation of the Regional Climate Committee (RCC) to be composed of representatives from all partners to collectively obtain financing and achieve the objectives of the RCAP. Currently, there is potential for HCAOG to serve as the RCC.

The RCAP is broken down into strategies, measures and actions. Strategies describe an overall approach for reducing GHG emissions within a given sector. Measures are long-range policies that the Humboldt region has established to ultimately reduce GHG emissions. Some measures may be further disaggregated to set goals for “urban” or “rural” regions. Actions identify the programs, policies, funding pathways, and other specific commitments that will be implemented within the region. The following are the strategies contained in the RCAP:

Table A. RCAP Strategies with 2030 GHG Reductions.

Strategy	Strategy	2030 GHG Reduction
1.	Development of a regional climate coalition	Supportive
2.	Increase carbon-free electricity	15,403 MT CO _{2e}
3.	Decarbonization of existing construction	6,424 MT CO _{2e}
4.	Decarbonization of new construction	3,626 MT CO _{2e}
5.	Shift driving to walking and biking	2,227 MT CO _{2e}

6.	Shift driving to public transit or car-share	38,235 MT CO _{2e}
7.	Shift land use to reduce Vehicle Miles Traveled (VMT)	Supportive
8.	Increase zero-emission vehicle adoption	122,310 MT CO _{2e}
9.	Reduce organic waste	29,689 MT CO _{2e}
10.	Conserve water and reduce wastewater emissions	Supportive
11.	Increase carbon sequestration	1,532 MT CO _{2e}
12.	Explore reduction in harmful refrigerant release	Supportive

As can be seen in the table above the dominant reductions are transportation related, which correlates with the largest emitter of GHG emissions in Humboldt County which is transportation related. Under each one of these strategies are measures and actions. Where it says the strategy is supportive, there is no reduction given for the measures in that strategy, but the effort taken to implement those measures and actions will complement the other measures and actions for which GHG reductions are occurring.

Regional Climate Committee

Strategy 1 of the RCAP is the formation of the RCC. This strategy is considered the cornerstone of the RCAP and will be the first to be implemented. As the region's first RCAP, establishing a collaborative approach to expanding and improving shared infrastructure, such as an interconnected energy and transportation system and regional waste management solutions, is necessary to successfully achieve GHG reductions in each sector. Part of this effort is the hiring of a program manager to serve as the staff for the RCC. Initially it was hoped that this position and the other necessary supporting positions could be funded with grants, but that may not be realistic. It will be important to have sustained support for a position to attract qualified candidates. HACOg has evaluated what it would cost for a Senior Planner-level position within HACOg and divided the cost by the proportionate size of each jurisdiction. The county's share would be about half the position since which is approximately \$100,000 per year. This would be a commitment through 2030, the time at which the RCAP would need to be redone. The action is not needed today, but there will be a future time at which this decision will need to be made. A decision can be made on the RCAP without deciding on the RCC.

RCAP CEQA-Qualified Status for Streamlining

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 can 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 GHG emissions analysis. A CEQA GHG Emissions Streamlining Checklist has been developed for this analysis (Attachment 10), which is an internal planning tool valid until 2030 to assess project consistency with the RCAP. The checklist itself 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 RCAP is good until 2030 at which time it will need to be updated to address the 2045 goals. It cannot be used for streamlining after that date and the EIR is based on the 2030 goals so the EIR will become stale in 2030 for tiering purposes as well.

Issues Brought up during review of RCAP.

1. Carbon Credits. Concern expressed that the county's carbon credits are being sold elsewhere in the state and not being used towards GHG emissions reductions in the RCAP. There is truth to this. Carbon credits are being sold by private landowners to other jurisdictions in the state through the Cap-and-Trade program and are not currently being used in the RCAP to reach emissions reduction targets. There is currently no accepted methodology that calculates the carbon being sequestered by local natural and working lands for purposes of achieving the targets of a Climate Action Plan. The county has received a grant and is actively working towards developing a study for this to incorporate carbon sequestration into the 2030 update for the RCAP. In addition, the county is only allowed to use carbon sequestration for up to 15% of emissions reduction required to reach carbon neutrality by 2045.
2. CEQA Streamlining Checklist. The CEQA Streamlining Checklist is a tool that will be used by staff to determine whether a project is consistent with the RCAP and as such requires no further GHG analysis. This is only intended to show compliance with the RCAP and is not a policy document of its own. Some commentors wanted to review it and see it included in the DEIR review, but the focus should be on the policy guidance provided by the RCAP. Others wanted to see a list of projects that could screen out, but this is not practicable as it is impossible to envision every project that may be submitted and able to comply with the RCAP. One of the screening criteria that some did not like was that in order to screen out as consistent with the RCAP the project has to be consistent with the General Plan and Zoning. In some cases, the proposed change may result in a reduction in GHG emissions, but this may not always be the case. In litigation involving streamlining of GHG emission analysis the cases that have not been supported by the courts were found to not have General Plan and Zoning consistency as a prerequisite.
3. VMT Reduction - Measure T-3. This measure has evolved over time. The objective of the measure is to reduce VMT in areas most likely to support transit. The original measure was intended to apply to areas that qualified under the Baseline Connectivity Score which was to be decided as part of a forthcoming HACOG study. The study area was limited to the area around Humboldt Bay, and the timing of the study was not certain, so staff modified this to apply to infill development within urban areas. These are areas that have the highest likelihood of having public transit. There was still pushback on limiting this to urban areas so

the reference to urban areas was removed and it now applies to “Priority Infill Areas” which are defined as: *Building within unused and underutilized lands within existing development patterns, typically but not exclusively in urban areas, and within a half mile of existing transit stop*. This was recommended for approval by the Planning Commission. Staff expects there will be further comment on this.

CEQA GHG Emissions Thresholds:

The CEQA GHG Emissions Thresholds would be used to assess future (pre-2030) development projects and their GHG emissions impact under CEQA when a project does not comply with the RCAP. This analysis will be used to determine whether the GHG emissions have the potential to cause a significant environmental impact utilizing the established thresholds.

The thresholds will need to be updated in 2030, along with the RCAP, to focus on achieving the 2045 targets. The *CEQA GHG Emissions Thresholds and Guidance Report* (Attachment 9), calculates urban and rural quantitative GHG emissions thresholds for new-residential, new non-residential and new mixed-use development.

The 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 for 2030 by the number of anticipated residents, full-time employees, or service population for that year. The Thresholds and Guidance Report established two important thresholds that became a point of division at the Planning Commission. The report established the threshold that would be appropriate for compliance with the RCAP. This is shown in Table 7 of the Thresholds and Guidance Report which is included below. The report stated that the thresholds in Table 7 meet the 2030 target but allow for higher GHG emissions from development than is necessary with existing development techniques. The thresholds further explain: To better position Humboldt for an efficient pathway to achieve the long-term 2045 target and align with GHG emissions thresholds seen throughout the state, the Humboldt initial urban and rural thresholds (shown in Table 9) were reduced by 50%. Table 9 presents the adjusted urban and rural GHG emissions thresholds for Humboldt. Table 9 is also presented below.

Table 7 → Humboldt Initial Urban and Rural GHG Emissions Thresholds¶

¶	2030-New-Development¶		
	New-Residential¶	New-Non-Residential¶	New-Mixed-Use¹¶
Urban²¶	¶	¶	¶
GHG-Emissions-Forecasted-¶ (new-MT-CO₂e)³¶	11,393¶	13,637¶	25,030¶
Demographic-Metric⁴	3,140-new-residents¶	1,678-new-employees¶	4,818-new-service-people⁴¶
GHG-Efficiency-Threshold-¶ (MT-CO₂e-per-demographic-metric-per-year)¶	3.63-per-resident¶	8.13-per-employee¶	5.19-per-service-person¶
Rural⁵¶	¶	¶	¶
GHG-Emissions-Forecasted-¶ (new-MT-CO₂e)³¶	15,670¶	16,041¶	31,711¶
Demographic-Metric⁴	4,284-new-residents¶	1,967-new-employees¶	6,251-new-service-people⁴¶
GHG-Efficiency-Threshold-¶ (MT-CO₂e-per-demographic-metric-per-year)¶	3.66-per-resident¶	8.16-per-employee¶	5.07-per-service-person¶

Table 9 → Humboldt Adjusted Urban and Rural GHG Emissions Thresholds¶

¶	2030-New-Development¶		
	New-Residential¶	New-Non-Residential¶	New-Mixed-Use¹¶
Urban¶	¶	¶	¶
GHG-Efficiency-Threshold-¶ (MT-CO₂e-per-demographic-metric-per-year)¶	1.81-per-resident¶	4.06-per-employee¶	2.60-service-person²¶
Rural¶	¶	¶	¶
GHG-Efficiency-Threshold-¶ (MT-CO₂e-per-demographic-metric-per-year)¶	1.83-per-resident¶	4.08-per-employee¶	2.54-service-person¶

From a CEQA perspective the thresholds in Table 7 reflect the RCAP and thus would maintain consistency with the RCAP. Any threshold that reduces the amount of GHG emissions would also be consistent with the RCAP and EIR analysis. There was concern by the cities that the 50% threshold reduction was too austere and would have the effect of discouraging development in Humboldt County as a whole.

The staff recommendation to the Planning Commission was to modify the thresholds by 25% from the thresholds in Table 7. This was an effort to strike a balance between achieving reasonable reductions which discourage development. The Planning Commission recommended the 25% reduction (75% of the thresholds in table 7) but was split between commissioners who wanted to use the thresholds at 50% and commissioners that supported the thresholds in table 7 as presented.

It cannot be ignored that the 2030 goal is achievable, but to achieve the 2045 goal of an 85% reduction there will need to be greater reductions in GHG emissions. It could be that projects constructed now before 2030 would then be existing construction post-2030 and could require modifications to allow the county to achieve the 2045 target.

The division at the Planning Commission was between the position that the county should do everything in its authority to reduce GHG emissions and the position that when you make it too difficult to build, people will not build, and the county is not seeing much new development. Both positions have valid points, as reflected in the table presented above showing the reductions associated with each of the strategies, the reduction coming from Decarbonization of New Construction is not a significant contributor to the overall GHG Reduction goal.

The only thresholds with substantial evidence in support of the threshold are the thresholds in Table 7. These are taken from the RCAP and are consistent with the RCAP's 2030 targets. A 50% or a 25% reduction are reductions to lessen the post-2030 burden but have no evidence to support the impact they will have.

The Planning Commission recommended adoption of the Thresholds at a 25% reduction but was emphatic about wanting the Board to give this consideration. The following table shows the thresholds at the various levels. Option 3 are the Thresholds presented in Table 7 and option 2 represents a 25% reduction.

Table B. Options for CEQA GHG Emissions Thresholds¶

¶	2030 New Development¶		
	New Residential¶	New Non-Residential¶	New Mixed-Use¹¶
Urban²¶	¶	¶	¶
Option 1 (50%)¶	1.82-MT-CO₂e-per-resident¶	4.07-MT-CO₂e-per-employee¶	2.60-MT-CO₂e-per-service-person¶
Option 2 (75%)¶	2.72-MT-CO₂e-per-resident¶	6.10-MT-CO₂e-per-employee¶	3.89-MT-CO₂e-per-service-person¶
Option 3 (100%)¶	3.63-MT-CO₂e-per-resident¶	8.13-MT-CO₂e-per-employee¶	5.19-MT-CO₂e-per-service-person¶
Rural⁵¶	¶	¶	¶
Option 1 (50%)¶	1.83-MT-CO₂e-per-resident¶	4.08-MT-CO₂e-per-employee¶	2.54-MT-CO₂e-per-service-person¶
Option 2 (75%)¶	2.75-MT-CO₂e-per-resident¶	6.12-MT-CO₂e-per-employee¶	3.80-MT-CO₂e-per-service-person¶
Option 3 (100%)¶	3.66-MT-CO₂e-per-resident¶	8.16-MT-CO₂e-per-employee¶	5.07-MT-CO₂e-per-service-person¶

Notes: MT-CO₂e = metric tons of carbon dioxide equivalent¶

A comment was made at the Planning Commission that the CEQA Thresholds cannot be modified

without recirculating the DEIR because these thresholds were used to evaluate the RCAP. The confusion seems to stem from the fact that the thresholds stated in Table 9 (50% reduction) were included in the project description of the DEIR. An Erratum has been prepared for the Board of Supervisors consideration that explains the thresholds were not a metric used to evaluate the RCAP but were developed from the RCAP. The Errata replaces the 50% reduction threshold with the thresholds shown in Table 7 because this is consistent with the RCAP and that is what the EIR evaluated. Any reduction to the thresholds that were evaluated in the EIR (i.e. to 75% or 50%) represents a decrease in impacts and would not require recirculation.

Environmental Review for the RCAP and CEQA GHG Emissions Thresholds:

A programmatic EIR has been prepared to assess the potential impacts of implementing the RCAP and CEQA GHG Emissions Thresholds (SCH#2024081319) finding potentially significant and unavoidable impacts related to aesthetics, air quality, noise, utilities/service systems, cultural resources, Tribal cultural resources, biological resources, agriculture and forestry resources.

The programmatic EIR evaluates the potential and foreseeable environmental impacts associated with implementation of the RCAP. Implementation of the RCAP could result in projects such as a large-scale organic waste processing facility, renewable energy projects, renewable fuel production projects, improved transit facilities and improvements to electric grid infrastructure. As such, the Programmatic EIR provides the opportunity for "tiering." 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 may include new site-specific impact identification and potentially new mitigation measures. This programmatic EIR is not for the purpose of providing environmental clearance of all future projects which implement the RCAP.

All environmental issue areas under CEQA were analyzed for implementation of the RCAP and CEQA GHG Emissions Thresholds in the EIR. Potential impacts that were found not to be significant include impacts related to Geology and Soils, Hazards and Hazardous Materials, Mineral Resources, Hydrology and Water Quality, Public Services, Recreation, Wildfire, GHG Emissions, Energy, Land Use and Planning, Population and Housing, Transportation, Air Quality, Biological Resources, Agricultural and Forestry Resources, Cultural Resources, Tribal Cultural Resources, Noise, and Utilities and Service Systems.

There are 10 identified significant and unavoidable impacts in the DEIR related to Aesthetics, Air Quality, Biological Resources, Agricultural and Forestry Resources, Cultural Resources, Tribal Cultural

Resources, Noise, and Utilities and Service Systems even with mitigation; and there are six identified potentially significant impacts that can be reduced to a level of less than significant with mitigation related to Aesthetics, Air Quality, Biological Resources, Cultural Resources, Tribal Cultural Resources, and Noise.

The DEIR was filed with the State Clearinghouse (SCH#2024081319) and released for 45-day public review from Feb. 18, 2025, to April 5, 2025. The Draft EIR contains a description of the proposed project, description of the environmental setting, identification of proposed project impacts, and mitigation measures for impacts found to be significant, as well as an analysis of proposed project alternatives. The DEIR was provided to interested public agencies and the public and was made available for review on the county's website.

Public and Agency Comments on DEIR

A total of five comment letters were received on the DEIR from various agencies and individuals. There is also a set of comments that were received at the public meeting at the Wharfinger building on March 18, 2025. Many of the comments received, however, were not on the DEIR but on the RCAP itself and minor modifications have been made to the RCAP through consideration of these comments. A full list of the comments received on the RCAP with staff responses are included in Attachment 14.

A FEIR was prepared that responds to the comments received on the DEIR. The FEIR consists of the comment letters and public meeting comments received on the DEIR, responses to those comments, any changes made to the DEIR and the DEIR. Responses to comments on the DEIR are included in Chapter 2 of the FEIR with copies of the letters. The major comments received on the DEIR are listed below, and two Master Responses were prepared to address these major comments.

- Concern regarding tiering vs. streamlining allowed under the RCAP and the potential to approved future projects without full environmental analysis.
- Concern that the CEQA GHG Emissions Streamlining Checklist was not available with the DEIR.

The FEIR was made available to the public on Oct. 3, 2025.

Tribal Consultation

The following Tribes were contacted regarding the project:

- Bear River Band of the Rohnerville Rancheria
- Big Lagoon Rancheria
- Blue Lake Rancheria
- Cher-Ae-Heights Indian Community of the Trinidad Rancheria
- Elk Valley Rancheria
- Estom Yumeka Maidu Tribe of the Enterprise Rancheria
- Grindstone Rancheria of Wintun-Wailaki

- Hoopa Valley Tribe
- Karuk Tribe
- Melochundum Band of Tolowa Indians
- Pulikla Tribe of Yurok People
- Quartz Valley Indian Community
- Round Valley Reservation/Covelo Indian Community
- Scotts Valley Band of Pomo
- Shasta Indian Nation
- Tolowa Dee-ni' Nation
- Tsnungwe Council
- Wiyot Tribe
- Yurok Tribe

These Tribes were contacted as part of formal consultation pursuant to AB 52. Representatives of the Shasta Indian Nation, Quartz Valley Indian Community and Karuk Tribe responded that no further consultation was desired or that they did not have the capacity to review the project. No other responses were received.

Alternatives Evaluated in DEIR

The DEIR identifies project alternatives as required by CEQA in order to reduce potentially significant impacts. These include a No Project Alternative 1, a Sustainable Communities Alternative 2, and an Enhanced Carbon Sequestration Alternative 3. The Sustainable Communities Alternative 2 builds upon the RCAP's focus on infill development patterns and developing regional mobility hubs and would modify RCAP measures T-3 to encourage mixed-use development in infill priority areas and RCAP Measure T-4 to commit the local jurisdictions to initiate the planning and development of Mobility Hub projects by 2027. Alternative 2 would further reduce VMT and associated GHG emissions, air pollutant emissions, and transportation energy use in Humboldt in comparison to the proposed plan. While most Alternative 2 impacts are similar in significance to the proposed plan, greater benefits related to air quality, energy use, GHG emissions, and transportation would occur. Alternative 2 would also meet all the plan objectives. This alternative would meet both the state 2030 and 2045 emission reduction goals.

The Enhanced Carbon Sequestration Alternative 3 would revise RCAP Measure CS-1 to expedite the development of a carbon stock study by 2026 and the development and adoption of policies, programs and regulations for maintaining and enhancing carbon sequestration in natural and working lands and implement tracking mechanisms by 2027. Alternative 3 would also modify RCAP Measure CS-3 to expedite the completion of feasibility studies to assess the capacity and suitability of potential sites for industrial carbon sequestration by 2027 and require the county to initiate project planning and development processes based on the findings of the feasibility studies by 2030. Alternative 3 would also result in the inclusion of carbon sequestration from natural and working lands in the GHG inventory update sooner than the RCAP. This would demonstrate the extent to which the county's

carbon stock is offsetting GHG emissions generated within Humboldt, thereby contributing to the achievement of the county's overall climate action goals by contributing to up to 15% of GHG emissions reductions required to achieve carbon neutrality by 2045. The remainder of the RCAP would also be implemented as laid out in the RCAP document, and Alternative 3 would meet the Statewide 2030 and 2045 GHG emissions reduction goal.

Based on the alternatives analysis in the DEIR, the No Project Alternative 1 was identified as the environmentally superior alternative to the RCAP as it would lessen the severity of most impacts of the proposed plan. However, it would not meet any of the proposed plan objectives. If the No Project Alternative is environmentally superior, CEQA requires selection of the "environmentally superior alternative other than the No Project Alternative" from among the proposed plan and the alternatives evaluated. While most Alternative 2 impacts are similar in significance to the proposed plan, greater benefits would occur related to air quality, energy use, GHG emissions, and transportation. Alternative 2 would also meet all the plan objectives. Though Alternative 3 would not result in greater GHG emissions reductions compared to the RCAP and Alternative 2, it would advance Humboldt's climate action goals to a greater extent than the proposed plan.

Alternative 3 has been identified in the DEIR as the environmentally superior alternative other than the No Project Alternative. However, the expedited timelines for studies and implementation of actions identified under Measures CS-1 and CS-3 are infeasible at this time. While the county has recently received a grant and is working towards developing a Natural and Working Lands Carbon Stock Inventory and a Carbon Sequestration Feasibility Study, the soonest anticipated completion date for the inventory would be 2027, and 2028 for the feasibility study. Therefore, staff is not recommending the adoption of Alternative 3. Although Alternative 2 was not identified as the environmentally superior alternative in the DEIR, it is being presented to the Planning Commission and Board of Supervisors as an alternative that can be implemented as part of the RCAP as the RCAP partners are already working towards these goals.

Statement of Overriding Considerations

Pursuant to Section 15093 of the CEQA Guidelines, the county may only approve a project with significant unavoidable impacts if specific economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the project outweigh its unavoidable, adverse environmental impacts. In the CEQA resolution the Statement of Overriding Consideration revolved around Humboldt County's contribution to addressing a global climate challenge, a blueprint for achieving the state requirements for greenhouse gas emissions reductions in a regional context and complying with the 2017 Humboldt County General Plan.

Climate change is a global concern, and there are state laws prescribing Humboldt County take action. The implementation of the RCAP will result in changes to how power is provided, and to facilities associated with that. These are necessary changes if something is to be done about climate change.

SOURCE OF FUNDING:

Regional Early Action Planning (REAP) Grant (1100282-410)
General Fund (1100-282)
Cities of Arcata and Eureka

FINANCIAL IMPACT:

Work on the project was funded by a REAP grant, the General Fund, and the cities of Arcata and Eureka. The REAP grant provided \$158,377 in funds towards Rincon Consultants' work on the project and \$64,233 in funds towards staff work. The General Fund provided approximately \$244,000 for staff work on the project and approximately \$176,383 towards consultant work on the project. The cities of Arcata and Eureka each provided \$11,750 towards consultant work on the CEQA GHG Emissions Streamlining Checklist associated with the project. RCEA funded a significant amount of the early work on the first draft of the CAP.

Implementation of the RCAP could involve a cost share to support the Program Manager of the RCC. This would be approximately \$100,000 per year in 2026, 2027, 2028, 2029, and 2030.

STAFFING IMPACT:

Staff time related to research and drafting the proposed RCAP and CEQA GHG Emissions Thresholds was accomplished with current staff resources. There is no anticipated increase in workload for Planning Staff related to the adoption of the RCAP or CEQA GHG Emissions Thresholds. Implementation of the RCAP and RCC would require additional staff resources and ongoing work to monitor the plan.

OTHER AGENCY INVOLVEMENT:

The RCAP is a regional plan which requires the involvement of the Incorporated Cities of Arcata, Blue Lake, Eureka, Fortuna, Ferndale, Rio Dell and Trinidad, as well as HCAOG, RCEA, HTA and HWMA. The RCAP and measures and actions, CEQA GHG Emissions Thresholds and FEIR were all developed through meetings, interviews, and review from partners of the RCAP.

ALTERNATIVES TO Planning Commission RECOMMENDATIONS:

1. The Board of Supervisors could elect not to certify the EIR or adopt the RCAP and CEQA GHG Emissions Thresholds. This is however, not recommended as the RCAP would satisfy Policy AQ-P9 and Implementation Measure AQ-IM3 of the Air Quality Element in the General Plan.
2. The Board of Supervisors could elect to adopt the CEQA GHG Emissions Thresholds at 50% of the initial calculations, which would achieve the RCAP 2030 target and further assist in achieving future 2045 targets.
3. The Board of Supervisors could elect to adopt the CEQA GHG Emissions Thresholds at 100% of the initial calculations, which would achieve the RCAP 2030 target and be supported by substantial evidence provided by AEP guidance.

ATTACHMENTS:

1. Draft CEQA Resolution
2. Draft EIR - <https://humboldt.gov/DocumentCenter/View/136011>
3. Final EIR
4. Errata to the Final EIR
5. Mitigation Monitoring and Reporting Program
6. Draft RCAP Resolution
7. Humboldt Regional Climate Action Plan
 - 7A. Appendix A Climate Regulatory Context
 - 7B. Appendix B GHG Inventory, Forecast and Targets Report
 - 7C. Appendix C GHG Measure Reduction Quantification and Substantial Evidence Report

8. Draft CEQA GHG Emissions Thresholds Resolution
9. CEQA GHG Emissions Thresholds and Guidance Report
10. Draft CEQA GHG Emissions Streamlining Checklist
11. Public Workshop Staff Report August 7, 2025
12. PC Resolution 25-069 October 16, 2025
13. PC Resolution 25-068 October 16, 2025
14. Responses to Public Comments

PREVIOUS ACTION/REFERRAL:

Meeting of: 8/7/2025 Planning Commission Public Workshop
File No.: 25-906

Meeting of: 10/16/2025 Planning Commission
File No.: 25-1236