

**RESOLUTION OF THE PLANNING COMMISSION
OF THE COUNTY OF HUMBOLDT**

Resolution Number 25-068

Record Number LRP-2019-15593

RECOMMENDING THAT THE BOARD OF SUPERVISORS ADOPT THE HUMBOLDT REGIONAL CLIMATE ACTION PLAN AND CEQA GHG EMISSIONS THRESHOLDS.

WHEREAS, in 2006, AB 32, the “California Global Warming Solutions Act of 2006,” was signed into law and codifies the Statewide goal of reducing GHG emissions to 1990 levels by 2020 and requires CARB to prepare a Scoping Plan that outlines the main State strategies for reducing GHG emissions to meet the 2020 deadline; and

WHEREAS, on September 2018, the Board of Supervisors adopted a resolution in support of the Paris Agreement and committed to reducing greenhouse gas (GHG) emissions through the implementation of a Climate Action Plan; and

WHEREAS, the Humboldt Regional Climate Action Plan (RCAP) implements Policy AQ-P9 of the Air Quality Element in the General Plan, which 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”; and

WHEREAS, the RCAP initiates Implementation Measure AQ-IM3 in the Air Quality Element of the General Plan, which 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”; and

WHEREAS, on September 8, 2016, the governor signed SB 32 into law, extending AB 32 by requiring the State to further reduce GHGs to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). The bill charges CARB to adopt the regulation so that the maximum technologically feasible emissions reductions are achieved in the most cost-effective way; and

WHEREAS, in September 2022, AB 1279 was adopted, which codifies the Statewide carbon neutrality goal into a legally binding requirement for California to achieve carbon neutrality no later than 2045 and ensure 85 percent GHG emissions reduction under that goal. AB 1279 builds upon EO B-55-18 that originally established California’s 2045 goal of carbon neutrality; and

WHEREAS, the RCAP is a regional plan that identifies targets, strategies, measures and actions to achieve state goals for GHG emissions reduction to 40 percent below 1990 levels by 2030 and carbon neutrality by 2045, in line with AB 32, SB 32 and AB 1279; and

WHEREAS, the RCAP has been prepared pursuant to CEQA Guidelines Section 15183.5(b) which allows the streamlining of GHG emissions analysis for projects requiring CEQA that can show consistency with the applicable measures in the RCAP; and

WHEREAS, CEQA Guidelines Section 15064.7(a) defines a threshold of significance as “an identifiable quantitative, qualitative or performance level of a particular environmental effect, noncompliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant”; and

WHEREAS, CEQA Guidelines Section 15064.7(b) encourages public agencies to develop thresholds of significance that the agency uses in the determination of the significant environmental effects. Thresholds of significance adopted for general use as part of a lead agency’s environmental review process must be adopted by ordinance, resolution, rule, or regulations, developed through a public review process, and be supported by substantial evidence; and

WHEREAS, pursuant to CEQA Guidelines Section 15064.7(c), when adopting thresholds of significance, a public agency may consider thresholds of significance adopted or recommended by other public agencies or recommended by experts, provided that the decision of the agency is supported by substantial evidence; and

WHEREAS, the adoption by resolution of quantitative urban and rural CEQA GHG emissions thresholds that were developed using accepted guidance from the Association of Environmental Professionals (AEP) for establishing GHG emissions efficiency thresholds and using the local GHG inventory and demographic forecasts that were established in the RCAP, as well as considering adopted thresholds by other agencies, expert recommendation and public comment consideration is provided substantial evidence; and

WHEREAS, the Humboldt County Planning Commission held a public workshop on the RCAP and quantitative CEQA GHG Emissions Thresholds on August 7, 2025; and

WHEREAS, on Wednesday, August 30, 2025, the Planning Division caused to be published in the Eureka Times-Standard, a newspaper of general circulation in Humboldt County, a Notice of Public Hearing on the proposed adoption of the RCAP and CEQA GHG Emissions Thresholds; and

WHEREAS, on October 16, 2025, the Humboldt County Planning Commission continued the previous public workshop then held a public hearing on the RCAP and quantitative CEQA GHG Emissions Thresholds.

NOW, THEREFORE, IT IS HEREBY RESOLVED, that the Planning Commission make all of the following findings:

PUBLIC INTEREST

1. FINDING: Adopting the RCAP and CEQA GHG Emissions Thresholds, or the plan, would have several economic, social, technological, and regionwide environmental benefits and is, therefore, in the public interest.

- EVIDENCE:**
- a) Adoption and implementation of the plan will result in the reduction of local GHG emissions and would, therefore, improve local air quality and benefit public health.
 - b) The RCAP could provide economic benefits, such as creating jobs, saving residents money on energy costs through efficiency measures, or by fostering new technologies. As well, the RCAP would increase the County's and other local government agency's ability to obtain funding for future projects to implement the RCAP. Approval of the project could provide important economic growth Countywide.
 - c) The plan might offer improved community health, enhance regional mobility, or provide for other long-term needs for the community such as infrastructure and grid improvements.
 - d) The plan could enhance green technologies within the region, including microgrid projects in rural areas, and encourage the production and use of sustainable alternative fuels.
 - e) The plan would have significant regionwide environmental benefits such as increasing the protection and management of natural and working lands, encouraging future restoration projects and increase biodiversity, and reduce wildfire risk.

CONSISTENCY WITH THE GENERAL PLAN

2. FINDING: The adoption of the RCAP and CEQA GHG Emissions Thresholds is consistent with the General Plan.

- EVIDENCE:**
- a) The adoption of the RCAP and CEQA GHG Emissions Thresholds is

consistent with the following objectives of the General Plan:

- Goal PG-G2 Community Plans. “Coordinated regional plans that include more than one incorporated city, community, special district, and/or unincorporated area.”
- Policy G-P13 City-State-County Coordination. “Promote coordination between city, state, and County planning efforts through consistent communication, cooperative working relationships, and joint projects.”

In the Air Quality Element:

- Goal AQ-G4 Greenhouse Gas Emissions. “Successful mitigation of greenhouse gas emissions associated with this Plan to levels of non-significance as established by the Global Warming Solutions Act and subsequent implementation of legislation and regulations.”
- Policy AQ-P9 County Climate Action Plan. “Through public input and review, develop and implement 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 County-wide Climate Action Plan. “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.”
- Policy AQ-P1 Reduce Length and Frequency of Vehicle Trips. “Reduce the length and frequency of vehicle trips through land use and transportation policies by encouraging mixed-use development, compact development patterns in areas served by public transit, and active modes of travel.”
- Policy AQ-P13 Forest Sequestration and Biomass Energy. “Provide incentives for increased carbon sequestration on forest lands and encourage the reduction of smoke production through the utilization of excess forest biomass for sustainable energy generation and other uses.”

- Policy AQ-P14 Solar Electric System Capacity. “Encourage and provide incentives to increase solar-electric capacity in residential, commercial, and industrial sectors.”
- Policy AQ-P15 Energy Efficient Building Design. “Encourage and provide incentives for construction of buildings and energy saving measures beyond Title 24 requirements for residential and commercial projects.”
- Policy AQ-P16 Electric Vehicle Accommodations. “Encourage and provide incentives for commercial and residential design that supports the charging of electric vehicles.”
- Policy AQ-P17 Preservation and Replacement of On-site Trees. “Projects requiring discretionary review should preserve large trees, where possible, and mitigate for carbon storage losses attributable to significant removal of trees.”
- Standard AQ-S2 Evaluate Greenhouse Gas Emission Impacts. “During environmental review of large scale residential, commercial and industrial projects, include an assessment of the project’s GHG emissions and require feasible mitigation consistent with best practices documented by the California Air Pollution Control Officers Association in their 2008 white paper “CEQA & Climate Change” or successor documents.”

In the Energy Element:

- Goal E-G1 Countywide Strategic Energy Planning. “An effective energy strategy based on self-sufficiency, development of renewable energy resources and energy conservation that is actively implemented countywide through Climate Action Plans, General Plans and the Redwood Coast Energy Authority’s Comprehensive Energy Action Plan.”
- Goal E-G2 Increase Energy Efficiency and Conservation. “Decrease energy consumption through increased energy conservation and efficiency in building, transportation, business, industry, government, water and waste management.”
- Goal E-G3 Supply of Energy from Local Renewable Sources. “Increased local energy supply from a distributed and diverse array of renewable energy sources and providers available for local purchase and export.”
- Policy E-P1 Energy Conservation Standards and Incentives.

“Develop incentives to encourage residential and commercial building plans that exceed California Building Standards Code requirements for energy.”

- Policy E-P3 Local Renewable Energy Supply. “The County shall support renewable energy development projects including biomass, wind, solar, “run of the river” hydroelectric, and ocean energy, consistent with this Plan that increases local energy supply.”
- Policy E-P4 Transportation Energy Conservation and Alternative Fuels Substitution. “Support revitalization and infill projects within Urban Development Areas as a means to reduce long-term vehicle miles traveled as an energy conservation strategy. Support the development and implementation of Electric Vehicle (EV) charging stations and other alternative fueling infrastructure.”
- Policy E-P8 Electrical Transmission. “Promote PG&E funded capacity upgrades to electric distribution lines to facilitate distributed renewable energy production and electricity export from the county.”
- Policy E-P16 Sustainable Biomass Energy Production. “Coordinate with local agencies, communities, and landowners to develop biomass energy plans that are consistent with forest management, hazardous fuels reduction, and restoration needs and priorities.”
- Implementation Measure E-IM2 Comprehensive Action Plan for Energy. “Support efforts to implement the Redwood Coast Energy Authority (RCEA) Comprehensive Action Plan for Energy.”

In the Circulation Element:

- Policy C-P23 Public Transit Service. “The County shall coordinate and integrate with transportation providers so that a full range of travel patterns and connectivity with other modes of transportation are provided.”
- Policy C-P24 Long Term Transit Plan. “The County shall support HCAOG’s long term transit planning with the goal of increasing the percentage of public transit trips compared to automobile trips.”

- Policy C-P25 County-Wide Transportation Plan. "The County shall maintain a clear plan for development and improvement of multi-modal transportation infrastructure consistent with land use plans, intended community character and community priorities."
- Policy C-P28 Bicycles and Pedestrian Facilities in New Subdivisions. "Bicycle and pedestrian facilities should be encouraged to connect neighborhoods. Standards for urban, suburban, rural and remote contexts shall be developed."
- Policy C-P35 Protection of Designated Pedestrian and Bicycle Routes. "New development along and adjacent to planned and designated pedestrian and bicycle routes shall consider and incorporate those routes."
- Policy C-P36 Bicycle Facilities. "Encourage the planned placement of secure and/or weather-protected bicycle storage facilities at public buildings and bus stops, where appropriate. Incentivize placement of bicycle parking and storage at businesses, new or modified bus stops and multi-family housing."
- Policy C-P39 Encourage Bicycle and Pedestrian-Friendly Development. "Incentives should be given to developers who provide non-motorized facilities that connect neighborhoods in a design appropriate to the character of those neighborhoods."
- Standard C-S9 Prioritization of Pedestrian and Bicycle Facilities and Routes. "Objective criteria shall be used to prioritize construction of pedestrian and bicycle facilities and routes."
- Implementation Measure C-IM4 Regional Coordination. "Support and participate in joint circulation system and land use planning with HCAOG, affected cities, Caltrans, and other transportation agencies and providers."
- Implementation Measure C-IM7 Transit Infrastructure. "Work with regional transit providers to situate transit stops and hubs at locations that are convenient for transit users, and promote increased transit usage through the provision of shelters, benches, and other amenities."

- Implementation Measure C-IM8 Park and Ride Facilities. "Support Caltrans' efforts to add park-and-ride lots at locations as appropriate."
- Implementation Measure C-IM10 Transit Service to East, South and North County. "Pursue funding and partnerships with the Humboldt Transit Authority, Native American tribes, and non-profit transportation organizations to establish and sustain transit services to rural communities."

In the Waste Management Element

- Policy WM-P1 Implementation of Waste Reduction Programs. "Waste reduction, re-use and recycling programs should be implemented countywide on a continuous basis to achieve the maximum possible waste diversion rate."
- Implementation Measure WM-IM2 Solid Waste Management Authority. "Continue the County's participation in the Humboldt Waste Management Authority, including contracting and advocacy for the Countywide Integrated Waste Management Plan and Source Reduction and Recycling Element."

In other Elements of the General Plan

- Policy UL-P6 in the Land Use Element. Mixed-Use Zoning. "Utilize mixed-use zoning to help create town centers that are community focal points. The mixed-use zone shall promote higher density urban housing in concert with retail commercial uses, day care centers, and shopfronts, and shall include an abundance and variety of open spaces."
- Goal IS-G3 Interagency Coordination, in the Infrastructure and Services Element. "Coordinated planning, prioritization, funding, and implementation of infrastructure and public service projects across jurisdictional boundaries."
- Policy H-P17 Promote Infill, Reuse and Redevelopment. "The County shall promote infill, re-use and redevelopment of vacant and under-developed land within Urban Development Areas and Housing Opportunity Zones as a strategy to create affordable housing, provide an economic stimulus and revitalize community investment."
- Policy CO-P4 Support for Working Lands. "The County shall support policies that maintain profitable resource production

on timber and agricultural lands as a means to secure long-term protection and sustainability of open space lands through programs such as the Williamson Act and Timber Production Zone programs.”

CONSISTENCY WITH STATE PLANNING LAW

3. FINDING: The RCAP was developed in accordance with CEQA Guidelines Section 15183.5(b)(1) which allows the streamlining of GHG emissions analysis for projects requiring CEQA that can show consistency with the RCAP.

EVIDENCE: a) CEQA Guidelines Section 15183.5(b)(1)(A) states that a plan for the reduction of GHG emissions should quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area.

This is included in the RCAP and RCAP Appendix B *GHG Inventory, Forecast and Targets Report*.

b) CEQA Guidelines Section 15183.5(b)(1)(B) states that a plan for the reduction of GHG emissions should establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable.

This is included in the RCAP and RCAP Appendix B *GHG Inventory, Forecast and Targets Report*, which establish levels of GHG emissions for 2030 and 2045 that would not be cumulatively considerable. The quantitative GHG emissions thresholds further identifies the level of GHG emissions from activities that would be considered significant.

c) CEQA Guidelines Section 15183.5(b)(1)(C) states that a plan for the reduction of GHG emissions should identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the geographic area.

This is included in the RCAP and RCAP Appendix B *GHG Inventory, Forecast and Targets Report*.

d) CEQA Guidelines Section 15183.5(b)(1)(D) states that a plan for the

reduction of GHG emissions should specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level.

Measures and actions have been identified in the RCAP, and substantial evidence for achieving the specified GHG emission reduction targets is demonstrated in the RCAP Appendix C *Substantial Evidence Report*.

- e) CEQA Guidelines Section 15183.5(b)(1)(E) states that a plan for the reduction of GHG emissions should establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels.

RCAP measures and actions will be implemented in phases and progress reports will be prepared annually by the Regional Climate Committee and presented to the Board of Supervisors 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 in 2030 to include additional actions or revised actions to meet the 2030 goals.

In addition, the quantitative GHG emissions thresholds will be updated in 2030 to identify thresholds of significance consistent with the RCAP's 2030 update.

- f) CEQA Guidelines Section 15183.5(b)(1)(F) states that a plan for the reduction of GHG emissions should be adopted in a public process following environmental review.

An Environmental Impact Report has been prepared to assess the potential environmental impacts from the plan and thresholds, and the RCAP and CEQA GHG emissions thresholds are being adopted

through public process.

- 4. FINDING:** The proposed urban and rural quantitative GHG emissions thresholds for new-residential, new non-residential, and new mixed-use development projects are compliant with CEQA Guidelines Section 15064.7 for selecting thresholds of significance.

- EVIDENCE:** a) Adoption of the proposed quantitative GHG emissions thresholds for new development projects in urban and rural areas is in accordance with CEQA Guidelines Section 15064.7(b).

Thresholds are being adopted by resolution and have been developed through the public review process.

The quantitative GHG emissions thresholds were developed using accepted guidance in the 2016 White Paper provided by the Association of Environmental Professionals (AEP) for establishing GHG emissions efficiency thresholds and by using the local GHG inventory and demographic forecasts that were established in the RCAP. A *CEQA GHG Emissions Thresholds and Guidance Report* shows the methodology and calculations used for urban and rural quantitative GHG emissions thresholds for new-residential, new non-residential and new mixed-use development. 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 for 2030 by the number of anticipated residents, full-time employees, or service population in that year.

Thresholds will be applicable to projects with a pre-2030 initiation or buildout date, and will need to be updated with the RCAP in 2030 to set thresholds that reach the 2045 target.

- b) Adoption of quantitative GHG emissions thresholds at 75% of the initial calculated thresholds using accepted AEP methodology for new development projects in urban and rural areas is in accordance with CEQA Guidelines Section 15064.7(c).

While the calculated thresholds were developed using accepted guidance from AEP and would set the County up to achieve 2030 targets, the recommendation from Rincon Consultants is to reduce the initial calculated thresholds by 50% to better suit the County to

achieve 2045 targets.

While Rincons expert recommendation is to cut the initial thresholds by 50%, the initial thresholds at 100% were substantiated using AEP guidance. It is ultimately up to the decision makers on the final adopted thresholds that are appropriate for Humboldt County so long as they can be supported by substantial evidence. Staff recommended thresholds have been reconsidered in response to public comment received and Staff is recommending the adoption of thresholds at 75% of the initial calculations.

While Rincon recommends cutting the initial calculated thresholds by 50%, there is no real foundation for the 50% reduction. Staff agrees that adopted thresholds should not be compared to adopted thresholds similar to those in urban areas or counties with much larger populations, which was one of the foundations for Rincon's recommendation. After considering public comment that Humboldt County will be one of the first rural counties to adopt thresholds and our adopted thresholds will create a precedent for other rural areas, Staff recommends adopting thresholds at 75% of the initial calculated thresholds, as shown below. Adopting thresholds that are lower than the initial calculated thresholds would still consider Rincon's recommendation to intensify thresholds in order to reach 2045 targets, and would ensure that the County does not set thresholds that are similar to urban areas that are dissimilar to Humboldt County.

	2030 New Development		
	New Residential	New Non-Residential	New Mixed-Use ¹
Urban²			
75% of Calculated Thresholds	2.72 MT CO ₂ e per resident	6.10 MT CO ₂ e per employee	3.89 MT CO ₂ e per service person
Rural⁵			
75% of Calculated Thresholds	2.75 MT CO ₂ e per resident	6.12 MT CO ₂ e per employee	3.80 MT CO ₂ e per service person

These updated thresholds will be reflected in the final adopted *CEQA GHG Emissions Thresholds and Guidance Report*, and will be updated with the 2030 RCAP update.

BE IT FURTHER RESOLVED that the Planning Commission recommends that the Board of Supervisors of the County of Humboldt:

1. Adopt the findings supporting adoption of the Humboldt Regional Climate Action Plan and Quantitative CEQA GHG Emissions Thresholds; and
2. Adopt the Humboldt Regional Climate Action Plan and Quantitative CEQA GHG Emissions Thresholds, with the Threshold of significance set at .75 percent of the 2030 per person emissions target.

The foregoing Resolution is hereby passed and adopted after review and consideration of all the evidence on **October 16, 2025**.

The motion was made by COMMISSIONER LORNA MCFARLANE and seconded by COMMISSIONER IVER SKAVDAL and the following vote:

AYES: Commissioners: Lorna McFarlane, Iver Skavdal, Peggy O'Neill

NOES: Commissioners: Sarah West, Jerome Qiriazzi

ABSTAIN: Commissioners:

ABSENT: Commissioners: Noah Levy, Thomas Mulder

DECISION: Motion carried 3/2

I, John H. Ford, Secretary to the Planning Commission of the County of Humboldt, do hereby certify the foregoing to be a true and correct record of the action taken on the above-entitled matter by said Commission at a meeting held on the date noted above.



John H. Ford, Director
Planning and Building Department