

Humboldt Regional Climate Action Plan Draft Environmental Impact Report

Comments Received not on the DEIR with Responses

Organizational Comments Received:

Letter 101	Biofuelwatch Comment	Response
101-1	This comment expresses concern regarding potential climate damaging activities from implementing the RCAP, and states that the County did not address the issues that were raised in previous comments submitted on the RCAP.	<p>Previous comments received by the commenter on the RCAP raised concerns about the use of biofuels to achieve local GHG emissions reductions. Specifically, the commenter was concerned about the potential use of biofuels created from agriculture and deforestation practices, which would have additional climate impacts.</p> <p>To address the comment and concerns, language was added to the RCAP Measure T-10 to specify that biomass would be produced from locally sourced organic waste from sawmill byproducts, logging slash, thinning of small diameter trees, and animal waste. There is no intention in the RCAP to outsource biofuels from large producers that use agriculture practices or deforestation to create fuel.</p>

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102-29	The comment letter requests that the RCAP outline more specific detail for how progress of its' implementation will be tracked, monitored and made available to the public. Specifically, a timeline on each jurisdiction's website, updated quarterly, displaying progress toward a due date for each measure.	Currently, the RCAP includes an action for the Regional Climate Committee's (RCC) Climate Program Manager to develop annual progress reports for local decision makers to measure progress and establish accountability in achieving RCAP emissions reduction goals. There will be public accountability and all information will be available to the public.
102-30	The comment letter requests that the Regional Climate Committee be (1) adequately staffed; (2) meaningfully integrated into important decision making; (3) politically accountable. There is expressed support for the Humboldt County Association of Governments (HCAOG) to take on this role and for achieving the three expressed criteria for the Committee.	There is strong support from RCAP partners, the Board of Supervisors as well as the public for HCAOG to take on the role of the RCC. However, HCAOG's Board is still discussing details for accepting this role, and we cannot determine that this will be the final outcome at this time. The concern for adequate funding and staffing is shared by all.
102-31	The comment letter expressed concern that the designated Program Manager for the RCC is insufficient staffing to fulfill the actions identified in the RCAP.	In response to the limitations of one staff member, Action C-1b has been added to the RCAP Measures and Actions. "The Program Manager represents a larger staff need to fulfill the mission of the Regional Climate Committee and will obtain funding to support several staff in implementing and tracking the RCAP."
102-32	The comment letter expressed concern regarding funding and the range of grant applications to be submitted by the RCC with the amount of grant applications that get approved on average.	While the RCAP states that the RCC will pursue 3 – 5 grants per year, this is more of a target range and does not limit the amount of grants that can be applied for. This range was included in the language for Action C-1h so as not to overpromise and consider potential future constraints while aspiring for up to one grant application submitted every two to two-and-a-half months. As well, it is anticipated that applications for collaborative grant projects associated to the RCAP will be highly competitive and more likely to get awarded than a non-collaborative project.
102-33	The comment states that community support is essential for approval and implementation of the RCAP, and that lack of a broad base of support could stall climate	The RCAP clearly identifies goals for GHG reduction targets, measures that will be implemented to achieve these goals, and substantial evidence to support this.

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	progress. The comment concludes that the RCAP as drafted does not provide this.	
102-34	The comment letter requests information for the CEQA GHG Emissions Compliance Checklist and the and quantitative thresholds of significance.	The County is working with Rincon to develop the CEQA GHG Emissions Compliance Checklist and is included as Attachment 9. The quantitative thresholds of significance are available in the CEQA GHG Emissions Thresholds and Guidance Report on the County's website at www.Humboldt.gov/climateactionplan and included as Attachment 6.
102-35	The comment letter recommends updating the urban areas of the County and rural areas of the County that are identified in the RCAP to include more urbanized areas as urban such as McKinleyville, Cutten, Myrtle town, etc.	The RCAP has been updated to identify urban areas in line with the 2020 US Census Bureau, and now includes areas of McKinleyville, Cutten, Myrtle town, Humboldt Hill, Ridgwood, King Salmon, Fields Landing, and Fortuna. A map to identify urban areas has been included in the updated RCAP Attachment 5A.
102-36	The comment letter criticizes measure SW-1 of the RCAP and states that including efforts to meet SB 1383 requirements should not be included in the GHG emission reductions, but should rather be included in the adjusted BAU forecast because it is mandated by State law. The comment further states that Humboldt Waste Management Authority (HWMA) is in the process of setting up a local organics processing facility and SB 1383 does not require the County to develop its own facility, and the only emissions reductions that should be included here are the emissions reductions from transporting local waste to landfills.	<p>While it is true that guidance from the LCI states that “reductions measured towards a reduction target should not include the benefits of State programs already in force; rather these reductions should be reflected in the forecast,” the RCAP explains in Section 3.2 GHG Emissions Forecast, page 22, that “only State-mandated legislation that is being implemented independently of local influence or control is included in the legislative adjusted scenario forecast. State-mandated legislation that requires local government action to meet the requirements are excluded from the adjusted forecast and are included under measure quantification to protect against double-counting.” Several justifications for including the GHG emissions from additional efforts to meet SB 1383 are described below.</p> <ol style="list-style-type: none"> 1. There is nothing in Section 15183.5 of CEQA Guidelines that precludes local governments from including GHG emissions reductions from local efforts taken to meet requirements mandated by State law in plans for the reduction of GHG emissions.

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		<p>2. Section 4.2.1 page 50 of Appendix B <i>Greenhouse Gas Inventory, Forecast, and Targets Report</i> states that “although SB 1383 has been signed into law, compliance with this Senate Bill must occur at the jurisdiction-level rather than the state-level. Due to current limitations in local jurisdiction’s ability to comply with organic waste targets set by SB 1383, as well as regional exemptions for some local governments within Humboldt County, anticipated emissions reductions attributable to the bill are conservatively excluded from the forecast. However, estimated impacts associated with SB 1383 will be included in the GHG reduction measures in the CAP.”</p> <p>Lastly, the County has communicated with HWMA regarding the potential for a future local organics processing facility and they have informed us on the current constraints to achieve this. Including the development of a local processing facility in the RCAP actions and the emissions reductions associated with that action will not only assist the local government to go above the requirements of SB 1383, but will also provide a regional approach to obtain funding to complete this action.</p>
102-37	<p>The comment letter states that the RCAP should exclude both GHG emissions and energy uses for the Humboldt Bay Generating Station and the Humboldt Sawmill Company from the back cast 1990 inventory of the RCAP and referenced recommendations from the California Supplement to the US Community Wide GHG Emissions Protocol (Protocol).</p>	<p>The Protocol states that “counting emissions for both consumption of electricity by the community and generation by the power provider would double count the emissions, and emissions from electrical power production are not normally included in the community inventories.” The RCAP does not include industrial point source GHG emissions from energy production or industrial processes in the 2022 inventory and are therefore not included in the 1990 back cast.</p> <p>The Protocol states that “this Supplement is not intended to present every acceptable methodology, but rather to lay out a reasonable approach for considering sectors to include in a communitywide emissions inventory.” The Protocol further states that the “Protocol provides adequate flexibility in calculating indirect GHG emissions associated with electrify consumption.” Section 3.1 page 11 of Appendix</p>

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		<p><i>B Greenhouse Gas Inventory, Forecast, and Target Reports</i> explains that the 2022 Inventory “includes electricity and natural gas consumption from industrial operations as most industrial facilities in the area are not subject to regulations under the State's Cap and Trade program which typically governs industrial emissions. While there are some industrial facilities which are subject to Cap and Trade, disaggregated data was not available to remove State regulated industrial facilities energy use from activity data. Furthermore, local jurisdictions are considered to have some influence over the energy use at industrial land uses through zoning and building codes and therefore are included in the inventory. Emissions from industrial point source discharge have been excluded due to lack of local jurisdictional control over this emissions source.”</p> <p>Section 3.2.1 of Appendix B further provides a detailed explanation of what was included in the 2022 inventory. Page 14 of Appendix B explains that countywide energy usage for Humboldt communities was estimated using California Energy Commission countywide data which is reported based on residential and nonresidential consumption and cannot establish differentiation between commercial, industrial and agriculture utility consumption in the nonresidential sector. Page 12 of Appendix B explains that commercial electricity use is expected to comprise the majority of nonresidential consumption due to the decline in regional industrial operations. Page 52 of Section 5.1 of Appendix B further explains the methodology for calculating the 1990 back cast GHG emissions, which has been calculated using the State’s 2021 GHG emissions inventory compared to the State’s GHG emissions inventory in 1990 to get approximate percent reduction, which assumes that Humboldt’s activities associated to GHG emissions are generally in line with the State’s trends. This calculation was developed using the published Statewide emissions results from the California Air Resources Board (CARB) after removing emissions from sectors not included in the inventory (e.g., non-specified, industrial point sources, agricultural land management practices).</p>

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102-38	<p>The comment letter expresses concern regarding the vehicle miles traveled (VMT) reduction goals of the RCAP, and states that the goals are not consistent with CEQA and recommendations from the Governor’s Office of Planning and Research (now the Office of Land Use and Climate Innovation (LCI)) of 15% below existing VMT per capita. The comment further acknowledges that the RCAP is not a development project subject to VMT thresholds, but states that the VMT reductions of the RCAP are inadequate, unmeasurable and unenforceable.</p>	<p>As acknowledged by the comment, the RCAP itself is not a development project that would need to adhere to Transportation VMT thresholds of significance adopted by the County. As of now, there is no threshold for Transportation VMT adopted by the County. The Planning & Building Department (Department) is currently working on a VMT Threshold Policy for adoption by the Board of Supervisor’s which would set a threshold that is decided on and approved by the decision-making body. The Department is recommending a threshold of 15% below existing VMT for the County.</p> <p>Per CEQA Guidelines 15183.5(a)(1)(D), targets of the RCAP to reduce GHG emissions need to be realistically set and based on substantial evidence. After consultation with HCAOG, and the Humboldt Transit Authority (HTA), the VMT measures and actions of the RCAP and associated GHG emissions reductions have been established based on evidence of what could be reliably achieved. While the standard to VMT reduction related to evaluating transportation impacts is recommended to be a 15% reduction by LCI and the County’s proposed VMT guidelines will follow this recommendation. However, the RCAP is a regional plan to reduce GHG emissions, and the reductions claimed must be based on substantial evidence. The evidence does not support a 15% reduction in VMT for purposes of claiming the corresponding GHG emissions reductions. It is better to identify a certain level reduction with the idea that it can be exceeded than to claim an ambitious goal that cannot be achieved and compromise the whole plan.</p>
102-39	<p>The comment letter states that the RCAP is not consistent with the Regional Transportation Plan (RTP) because the VMT reduction targets are not the same as RTP targets.</p>	<p>The RCAP is not required to have consistency with RTP targets, and it has been relayed to the County that the RTP targets were not limited by a requirement to show substantial evidence that the objectives could be achieved. The more ambitious the RTP is, the greater the funding opportunities. While the targets of the RCAP fall short of the RTP objectives, measures and actions of the RCAP are consistent with several goals and policies in the RTP, and RCAP targets were developed to be supported by substantial evidence and to be feasible.</p>

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102-40	<p>The comment letter criticizes the RCAP measures to increase active transportation and transit mode share, and for the reduction of VMT, stating that they are not sufficient to achieve the GHG emissions reduction targets identified. This is mainly attributed to targeting only 3 grants applied per year, funding and staffing constraints, and lengthy and ineffective public processes. The comment recommends a universal adoption of complete streets policies, development of a regional quick-build program for bike and pedestrian infrastructure, and parking management measures to either limit or price parking supply in urban areas.</p>	<p>While the RCAP states applying for 3 – 5 grants per year, this does not limit the number of grants that may actually be applied for, but sets a reasonable and achievable target considering potential constraints.</p> <p>Many jurisdictions already have transportation policies that require complete streets, which are outlined in the DEIR Chapter 3.8 Transportation. As well, on page 49 of the RCAP, Strategy 5 mentions the importance of complete streets and Action T-1f urban identifies developing policies that require multimodal transportation which could include complete streets.</p> <p>Action T-1c Rural includes “work with the regional jurisdictions, HCAOG, and CalTrans to obtain funding for the construction of bikeway and pedestrian systems to improve interconnection within Humboldt County. Focus areas will be projects that connect rural communities to high employment areas such as City of Eureka, Arcata, and Fortuna as well as nearby counties, State, and federal infrastructure through integration of bicycle facilities as part of other roadway construction projects.”</p> <p>Action T-3c includes “plan prospective mixed-use and infill projects so that they include design considerations with regards to alternative energy access/generation, EV charging infrastructure, and local public transit facilities. Promote development that increases walkability and is bikeable in neighborhoods.”</p> <p>Actions T-2g Urban and T-2f rural have been added to the RCAP to prioritize spending of transit on transit-specific funding for transit needs first.</p> <p>Parking management does not equate to lower VMT in urban areas of Humboldt. Since the County is rural in nature, half of the population lives in rural Humboldt and lack effective alternative transportation, which</p>

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		<p>encourages VMT. Reducing available parking without providing more alternative modes of transportation may increase VMT.</p> <p>While funding is a major constraint to achieving local goals for transportation improvements, much of the work identified in the RCAP related to transportation is already being done by HCAOG and the HTA. A CEQA-qualified RCAP will provide a regional approach to obtaining additional funding for these efforts.</p>
102-41	<p>The comment letter states that Measure TR-3 of the RCAP lacks clear language or actions that promote infill, and only aims to increase mixed-use development in infill areas. It further states that the RCAP comes short of committing jurisdictions to change their zoning, and there is concern about not requiring new residential projects to be in infill areas and increase mixed-use, and the potential to allow streamlining of new residential projects that contribute to sprawl. The comment finishes with stating that the County is required to develop this RCAP to mitigate significant and unavoidable increases in VMT, and to quantify and mitigate GHG emissions from the 2017 General Plan update.</p>	<p>It is correct that Measure T-3 is intended to facilitate the reduction of VMT by increasing mixed-use development in infill priority areas. Implementation of the General Plan update includes changes to the County's designated zoning districts, which includes rezoning of areas for mixed-use where appropriate and this does not need to be redone with the RCAP. It is also true that the RCAP is a mitigation measure of the 2017 General Plan update for GHG Emissions and Land Uses under Implementation Measure AQ-IM3, but it is not a mitigation measure for Transportation or VMT impacts. Mitigation measures for Transportation and VMT impacts from the General Plan update included policies in the Circulation Element, C-P3, C-P10, C- P11, and C-IM17. While the RCAP is a mitigation measure required by the General Plan update for GHG Emissions and Land Uses, there are no specific requirements for this mitigation measure identified in the EIR for the General Plan. The RCAP itself is the mitigation measure. In addition, there are several ways to address standards for locally produced VMT, either in a General Plan amendment, through a GHG emissions reduction plan, or through the adoption of a VMT threshold (per Section 15064.7 of CEQA Guidelines) by ordinance, resolution, rule, or regulation. The County is taking the route to set standards for VMT through the adoption of a VMT threshold policy by resolution. The RCAP will further facilitate the reduction of local VMT, but does not establish standards or a VMT threshold for the County.</p>

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102-42	<p>The comment letter provides a list of additional potential measures to be included in the RCAP to reduce local VMT.</p> <ol style="list-style-type: none"> 1. Establish infill and transit-oriented development (TOD) overlay zones with minimum density requirements for as-of-right ministerial approval, streamlined permitting and reduced fees. CAPCOA indicates that GHG reduction in these zones could be as high as 31%. 2. Pass ordinances prohibiting redesignation and rezoning of land for lower intensity land uses in transit-oriented development areas (areas within walking distance of basic services and transit). 3. Charge a transportation impact fee for projects located more than a half mile from transit that lack bike/pedestrian infrastructure to create a fund used for improving transit and complete streets. 4. Have planning departments audit zoning codes for consistency with compact walkable development and require changes. 5. Further streamline permitting and reduce fees for construction of ADUs and affordable housing in targeted areas. 6. Increasing the cost and limiting the supply of parking decreases urban car ownership and driving mode share while creating the opportunity for construction of additional 	<p>The Department appreciates the list of potential measures for VMT reduction, and we feel that many of these items would be more appropriately addressed through the public process for adoption of a VMT threshold policy. Please see comments of each proposed measure below.</p> <ol style="list-style-type: none"> 1. The Department is considering TODs and establishing streamlining of projects that are within designated low VMT areas with the VMT Threshold Policy. However, due to financial constraints the Department is not in a place to reduce permit fees at this time. 2. The State has already passed SB 330 to prevent local jurisdictions from reducing the intensity of land that was permitted under zoning and general plans as of January 1, 2018. 3. Policy C-P12 of the Circulation Element in the General Plan calls for a countywide Traffic Impact Fee Program. This strategy for VMT reduction will be implemented in the County at a later time. 4. Due to existing and future time and staffing constraints this was not added to the RCAP. 5. ADU's are already allowed by right in zones that allow for single-family residents and 100% affordable housing projects may be approved for streamlining with the VMT Threshold Policy. However, due to financial constraints the Department is not in a place to reduce permit fees at this time and does not have any control over the cost for construction and building materials. 6. Parking management tends to be more effective in areas that have sufficient alternative modes of transportation. Due to the rural nature of the County, parking management strategies may not be as effective in reducing VMT as they are in genuinely urban areas with more alternative options for transportation. However,

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	<p>housing. This can be done on-street with metered parking with dynamic pricing and time limits, which can decrease transportation GHG emissions by 30%, or by reallocating street space from parking to bike lanes. Off-street parking can be limited or made more expensive by eliminating parking minimums, unbundling parking from rent, charging for workplace parking, and decreasing transit headways to less than 15 minutes, triggering a state law that forbids parking minimums within a half mile of transit stops.</p>	<p>this VMT reducing strategy may be considered with the VMT Threshold Policy. Action T-3a of the RCAP currently includes reducing parking requirements.</p>
102-43	<p>The comment letter criticizes measures of the RCAP stating that they must be enforceable or accompanied by significant evidence, be additive and not mandated by existing law, and be feasible. The comment letter specifies points 102-44 through 102-49 below.</p>	<p>See responses to 102-36 above and 102-44 through 102-49 below.</p>
102-44	<p>The comment letter states that Measure T-6 Action T-6b commits the RCC to draft an ordinance to streamline EV infrastructure but does not commit local jurisdictions to adopt an ordinance. The comment further states that the adoption of an ordinance is already required by AB 1236. Action T-6c commits the RCC to “working with local jurisdictions to modify the Municipal code to promote EV charger access in new developments, redevelopment and existing parking spaces. This may include [a list of possible code changes].” Listing a possible menu falls short of committing local jurisdictions to make specific code changes, and the lack of specificity makes it impossible to quantitatively predict or verify the result. A specific list of code changes</p>	<p>The County did adopt an Expedited, Streamlined Permitting Process for Electric Vehicle Charging Stations Ordinance (EVCS) on 9/12/2017. The code can be found at this link humboldt.county.codes/Code/843.</p> <p>While Action T-6c uses the language of “may” instead of “shall” this does not limit actions that will be taken under Action T-6c, and actions could include items that are not specified in the list. Though the County and local jurisdictions are committed to taking action to reduce GHG emissions, there is concern regarding increasing building code requirements beyond the standard CalGreen and Title 24 energy codes and further hindering the development of needed housing to meet Regional Housing Needs Assessment (RHNA) allocations. Each local jurisdiction of the RCAP will be able to take actions that are in alignment with their General Plan goals and community’s needs. As well, the State recently passed Assembly Bill (AB) 306 in early July 2025, which places a</p>

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	<p>that all jurisdictions “shall” adopt would turn this into a qualified CAP measure.</p> <p>The comment finishes with stating that the actions of Measure T-6 conflate the number of charging stations needed to support increased EV procurement and states that no supporting evidence is provided in the RCAP. It also states that the Action T-6b should be supportive and not included in the quantitative actions for reducing GHG emissions for the measure and further states that the 55,000 metric tons (MT) of CO2 emissions reductions should be reduced because of this.</p>	<p>moratorium on the adoption or modification of certain residential building standards 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.</p> <p>Actions T-6b and T-6c are just two out of five actions included in the quantification of the anticipated 55,726 MT of CO2 emissions reductions associated to Measure T-6. Substantial evidence and calculations to support this reduction target for 2030 is included in Appendix C <i>Greenhouse Gas Emissions Measure Reduction Quantification and Substantial Evidence Report</i> starting on page 66 through 71. We do not feel that there is a need to adjust the calculations for GHG emissions associated to the measure as it is supported by substantial evidence in Appendix C.</p>
102-45	<p>The comment letter explains that promoting charging stations in workplaces and multifamily housing would have the greatest impact on EV adoption and recommends including the adoption of reach codes to increase the percentage of workplace and multifamily housing off-street of new and substantially remodeled buildings to be charger ready or have Level-2 chargers installed. The comment also recommends requiring employers with 25 or more employees and with off-street parking to provide charging and preferred parking for zero emissions vehicles.</p>	<p>Action T-6e of Measure T-6 includes “for high employment areas, work with interested parties to develop new public access charging stations. Work with RCEA to develop partnerships with other charging companies as needed to accommodate charging station needs. Apply for Federal Charging and Fueling Infrastructure (CFI) grants to install electric vehicle chargers at community centers and in high employment areas.”</p>
102-46	<p>The comment letter states that the actions of Measure T-8 and the associated GHG emissions reductions calculated are mostly from enforcing Title 13 Section 2449.1(f)(2) of the CA Code of Regulations which requires the use of renewable diesel and was mandated</p>	<p>Measure T-8 contains a goal to “electrify or otherwise decarbonize 12% of applicable SORE (small off-road engine) 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 EO N-79-20.” There are several actions under this measure that are geared towards</p>

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	<p>by State law through Executive Order (EO) N-79-20. The comment then states that Humboldt County is on the list of captive attainment areas which exempts owners of off-road diesel equipment if they operate exclusively within the designated captive attainment areas. The comment concludes that 42,580 MT of CO2 emissions should be removed from the measures and GHG reductions included in the RCAP.</p>	<p>education and obtaining funding to decarbonize SORE equipment. In response to the comment, the language was updated on page 65 of the RCAP to include “while Humboldt County is on the list of captive attainment areas that exempts diesel equipment owners from using renewable diesel if they operate exclusively in Humboldt County, Measure T-8 aims to achieve significant emissions reductions from off-road equipment by encouraging fleets to electrify where feasible and increasing access to renewable diesel, aligning with CARB’s off-road equipment mandates. These efforts target reductions in local fossil fuel use and aim to decarbonize the off-road sector through regulatory measures, incentives, and community outreach.”</p> <p>Title 13 Section 2449.1(f)(2) of the CA Code of Regulations was implemented January 1, 2024, which is after the baseline year for the RCAP, and Humboldt County adjacent counties are on the list of areas exempt from the renewable diesel requirements. According to the Protocol, it is therefore, justified to include these efforts in the GHG emissions reductions associated to Measure T-8.</p>
102-47	<p>The comment letter states that SB 1020 requires 90% renewable electricity by 2035 and 95% by 2040, and this should be reflected in the adjusted forecast for 2045.</p> <p>Then further states that the RCAP cites RCEA’s 2019 RePower Plan and includes a target to provide customers with electricity sourced from 100% net-zero-carbon emission renewable sources by 2030, but the plan is over 5 years old, and this does not reflect the current RCEA target of 50% for the next 2 years. Given the high prices in the wholesale market there is a lot of uncertainty about what can actually be achieved, and the comment says the RCAP should use a conservative assumption that RCEA’s portfolio will conform to the States Renewable Portfolio Standards (RPS).</p>	<p>It is correct that SB 1020 requires utilities to source 90% of electricity from renewable and zero-carbon resources by 2035, and 95% by 2040. This has been reflected in the legislative adjusted scenario forecast. Page 49 of Appendix B states that “California’s Renewable Portfolio Standards was accelerated in 2022 by SB 1020 which established additional requirements that procurement from eligible renewable energy resources and zero-carbon resources increase to 90 percent of total procurement by 2035 and 95 percent of total procurement by 2040. The requirements of SB 1020 do not affect those previously set forth and are to be considered additional to the existing RPS requirements. The RPS program and SB 1020 were incorporated into the GHG forecast by adjusting the electricity emissions factors for future years.” Measure BE-1 accelerates the goals of SB 1020 by setting a target for sourcing 90% of grid-supplied electricity from renewable and carbon-free sources by 2030, 5 years ahead of SB 1020 targets.</p>

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	<p>The comment states that the RCAP mentions that RCEA's electricity is lower carbon than PG&E and uses this as justification for departing from the California average energy consumption in the inventory. Comparison of RCEA and PG&E power content labels from RCEA's inception in 2017 to 2023 reveals that, not counting biogenic carbon, RCEA's default plan was only lower carbon than PG&E for 2 years out of the 7, due to PG&E's high percentage of carbon free nuclear energy. Measures that aim to entice PG&E customers to switch to RCEA or prevent RCEA customers from opting out to PG&E will not reliably decrease carbon emissions from local energy consumption.</p> <p>Lastly, the comment criticizes the example included in the RCAP of the Department requiring cannabis operators to enroll in 100% energy programs as an example of effective methods to increase the percentage of non-residential customers receiving renewable and carbon-free electricity, and states that no substantial evidence was given for the reductions achieved through this program. The comment concludes that there is nothing in Measure BE-1 to support the calculated 15,403 MT of CO2 emissions reductions by 2030.</p>	<p>While it has been relayed to the Department that RCEA's procurement targets have recently changed due to regulatory changes and competitive market rates, it has been also relayed by RCEA that they are still on track to reach 100% renewable energy sourced by 2030, and that the changes to their targets to not affect the measures and quantifications in the RCAP. Therefore, no changes to quantifications are needed.</p> <p>The RCAP Appendix B Section 5.1 1990 Level GHG Emissions Back-cast does state that "because RCEA has a more renewable and carbon-free energy profile than PG&E, GHG emissions associated with building electricity use in the region have declined to a greater extent than Statewide trends reflect." It is further stated in Appendix C page 14, under Measure BE-1, that "RCEA currently offers electricity options with a GHG emission rate lower than the standard electricity options offered in the region. In 2022, RCEA's REPower electricity option sourced 50 percent of its supply from eligible renewable sources, while the REPower+ option supplied 100 percent from solar, wind, and eligible hydroelectric at a GHG emissions rate of zero' and cites the California Energy Commission (CEC) 2022 Power Content Label: Redwood Coast Energy Authority." Since the Inventory is for 2022, it is justified to use the cited data from the CEC to calculate the 1990 back-cast and anticipated GHG emissions reductions achieved from the measure.</p> <p>The example of cannabis operators required to obtain 100% renewable energy for operations is showing that this is something the County has jurisdictional control and influence over. No substantial evidence should be needed to show how much non-residential electricity was sourced due to this requirement since this is not a measure of the RCAP, and only pertains an example of local enforceability. Substantial evidence to support Measure BE-1 is included in Appendix C starting on page 14. We feel that, at this time, there is sufficient substantial evidence to support the GHG emissions reduced from this measure of 15,403 MT of CO2.</p>

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102-48	<p>The comment letter states that due to the area’s relatively low rate of new construction, the largest reductions in energy use from efficiency will come from existing buildings, and recommends the following alternative measures be included in the RCAP.</p> <ul style="list-style-type: none"> • That efficiency upgrades be a higher priority than heat pumps since smaller appliances can replace, and lowering both up front cost and subsequent electric bills, while decreasing demand on the grid. • Efficiency reach codes for new construction, renovation, and time of sale; reduced or waived fees, building performance standards, expedited permitting for energy retrofits, and energy benchmarking. • The Regional Climate Committee could create a Climate Corps program for home visits to do blower door tests and seal air leaks and ducts, and this may also be a way of pinpointing gas water heaters and furnaces nearing the end of life and prioritizing them for pre-emptive replacement. 	<p>While the County appreciates these potential measures for inclusion in the RCAP, there were some constraints to including these in the 2025 RCAP. However, these may be included in a future update to the RCAP, depending on need and feasibility.</p>
102-49	<p>The comment letter states that the RCAP should encourage local jurisdictions to pass ordinances to convert streetlights from incandescent to solar or LED.</p>	<p>In response to the comment, Action BE-7a was added to the RCAP. “Regional Climate Committee to develop a template resolution for each jurisdiction to decarbonize 30 percent of municipal buildings and facilities by 2030 and 100 percent by 2045 by retrofitting natural gas appliances with electric alternatives, conversion of streetlights to solar or LED, and install onsite electricity generation and storage capacity. Include in the resolution an ‘electric first’ purchasing policy for any equipment or appliances in need of replacement.”</p>
102-50	<p>The comment letter states that the 4% increase in existing residential building decarbonization for Measure</p>	<p>While the County appreciates these potential measures for inclusion in the RCAP, there were some constraints to including these in the 2025</p>

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	<p>BE-3 isn't ambitious enough and makes the following suggested additions to the RCAP to increase the target.</p> <ul style="list-style-type: none"> • An ordinance to improve indoor air quality in existing buildings by requiring replacement of gas stoves with electric induction at the end of life would have substantial gains for public health and equity, since indoor air pollutants reach higher concentrations in small homes, which often also don't have range hoods. Ideally this would be paired with an assistance program to help low-income homeowners and owners of affordable multifamily housing access all rebates and incentives. • An ordinance adopting a revised version of the Title 24 Voluntary Measure for Existing Housing. The state version requires heat pumps when replacing air conditioners at end of life. Adding furnaces would make this requirement applicable in coastal Humboldt where people rarely have air conditioners. • Use installation permit records to identify and reach out to building owners with appliances nearing end of life. • Establish a Volunteer Home Energy Coach program in which volunteers are trained to guide other residents through decision making about electrification and clean energy. Rewiring America is currently training cohorts of volunteers and 31 communities in Massachusetts have implemented coaching programs. 	<p>RCAP. However, these may be included in a future update to the RCAP, depending on need and feasibility.</p>
102-51	<p>The comment letter states that the RCAP sets a goal of decarbonizing 30% of municipal buildings and facilities by 2030, and that unlike other measures, there is</p>	<p>The Action BE-7a of the RCAP does include the language "RCC to develop a template resolution for each jurisdiction to decarbonize 30 percent of municipal fleets and facilities by 2030 and 100 percent by 2045."</p>

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	currently no goal for 2045. The comment suggests that Humboldt set the goal of decarbonizing 100% of municipal buildings by 2045.	
102-52	The comment letter criticizes Measure T-10 on renewable fuels and recommends removing the measure from the RCAP on the basis that it is misguided and would not affect the qualified status since it is only supportive. The comment gives several points of reasoning for removing the measure.	The Department has reviewed and considered the comments provided on Measure T-10, and language was significantly updated for this measure to explain that even though biofuels and other alternative fuels involve processes that produce some GHG emissions, these fuels still serve as a critical bridge in the transition away from fossil fuels and towards carbon neutrality, as well as providing incentives to promote healthy forest management and beneficial use of wood waste. While we appreciate the considerations of the points provided, Measure T-10 is appropriate in the RCAP as a supportive measure.
102-53	The comment letter states that refrigerants are missing from the RCAP and recommends using measures to address GHG emissions reductions from refrigerants to make up the gap of improbable, unsubstantiated, inflated, and misclassified GHG emissions reductions are removed, as recommended in the above comments. The primary source of refrigerant leaks in Humboldt County is supermarkets, and leak prevention is an important action to take in the short run. The EPA has a voluntary program of leak reduction called Green Chill that markets can be urged to join. Next to supermarkets, the next major sector of leaks comes from air conditioners. There is currently a push to replace air conditioners with heat pumps, however, most of these now use Hydrofluorocarbons (HFCs) refrigerants, creating a large problem for capture and end-of-life disposal. The RCC could educate and publicize on heat pumps and heat pump water heaters that do not use HFC's and establish fail-safe measures for end-of-life capture. New regulations in the RCAP could also require and	In response to the comment, an entire section was added to the RCAP starting on page 83 to include Refrigerants, Strategy 12: Explore Reduction in Harmful Refrigerant Release, and Measure R-1. This measure, however, is only supportive in the RCAP as information and data on local refrigerant use and leakage is currently unavailable, and refrigerants are currently regulated by the State through CARB. Page 12 of Appendix B states that "though the Community Protocol offers a methodology for assessing refrigerant emissions, it recognizes that obtaining accurate, reliable data for this sector on a community-wide scale poses a significant challenge. Due to lack of publicly available, reliable data regarding refrigerant use in the region, emissions from refrigerant use has also been excluded from the 2022 regional inventory." Measure R-1 aims to prepare a baseline analysis of the volume of HFC's 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.

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	incentivize HFC capture from smaller appliances at end of life, including freezers, refrigerators, and automobile cooling systems.	
102-54	<p>The comment letter states that the RCAP considers setting an end of natural gas flow date and then chooses not to on page 37, and recommends setting a target for an end of natural gas flow date by 2045. The comment further states that the RCAP should be more aggressive in switching from natural gas to electric heating. An example is given from the RCAP where electrification of feasible equipment is required for major renovations of commercial buildings but not for residential buildings.</p>	<p>It is true that the RCAP language under Strategy 3: Decarbonization of existing construction on page 40, mentions “actions that rely on voluntary replacement of natural gas equipment or ordinances requiring decarbonization at end-of-life replacements have been shown to reduce GHG emissions by approximately 10-30 percent, whereas the adoption of an end of natural gas flow date that requires all existing buildings to convert to electric equipment would eliminate all emissions associated with natural gas consumption in buildings.” The targets and goals of Measure BE-3 Urban and BE-4 Urban to reduce natural gas consumption from building electrification were established through interviews with the RCAP partner agencies. While having more aggressive goals and local regulations for transitioning away from natural gas would decarbonize buildings faster, there are economic impacts to local disadvantaged populations to consider.</p> <p>As well, the State recently passed AB 306 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.</p>
102-55	<p>The comment letter states that CAISO (the California Independent System Operator) has already approved a transmission plan that includes a new Humboldt 500 kV substation and long-distance high voltage transmission lines, a 500/115 kV transformer, a 115 kV line to Humboldt’s existing substation, and a 115 kV phase-</p>	<p>Currently, there is uncertainty around offshore wind energy production projects off of Humboldt Bay. The actions of Measure BE-8 on page 38 of the RCAP does still include the language to petition the CEC and offshore wind developers to include electricity transmission and distribution to the Humboldt region, identify pathways to establish equitable regional</p>

Letter 102	Coalition of Environmental Organizations Comment	Response
	<p>shifting transformer at the substation, which would make offshore wind energy available to our local distribution system. This makes it unlikely that wind power will bypass the local distribution system, and the comment recommends that the RCAP should encourage jurisdictions to advocate for an affordable Power Purchase Agreements for RCEA as part of a Community Benefits package.</p>	<p>access to electricity produces, and to lobby offshore wind developers to contribute to the funding of transmission upgrades.</p>
102-56	<p>The comment letter mentions that the RCAP discusses the emissions from combustion of anaerobic digester biogas and lagoons and uses emissions factors from the IPCC, adopted by the EPA. Then further states that studies have shown this is underestimated by the EPA and they emit far more methane than the EPA assumes, and more routine monitoring of methane is necessary in all Humboldt wastewater treatment plants. The comment finishes stating that this is a significant opportunity to reduce emissions because wastewater treatment plants are government owned and operated, land intervention to fix leaks can be directly required by entities covered in the RCAP.</p>	<p>While the County appreciates these comments and potential action for inclusion in the RCAP, there were some constraints to including this in the 2025 RCAP. However, this may be included in a future update to the RCAP, depending on need and feasibility.</p>
102-57	<p>The comment letter concludes with the need for climate action now and for implementation of the RCAP as soon as possible.</p>	<p>The County and partnered jurisdictions are well committed to adopting and implementing the RCAP. The DEIR was published for 45-day public review period on Tuesday, February 18, 2025, and the County is on track to adopt the RCAP this year. Though the completion of the RCAP has taken longer than expected, it was our responsibility to produce an RCAP that is in line with current data and accepted methodology. In order to stay on track for target of the RCAP adoption, it is imperative that we move forwards and not backwards at this time.</p>

Individual's Comments Received:

Letter 201	Annje Dodd & Praj White Comment	Response
201-1	The comment expresses concerns regarding where the funding will come from to implement the RCAP, specifically, the measures which include feasibility studies. Will the funding come from inflationary expenses such as increased agency fees, sales taxes, or property taxes that will burden the local economy?	Funding to implement the RCAP will come from grants and staff time from local jurisdiction employees.
201-3	This comment states that since Humboldt County only represents 0.4% of statewide GHG emissions and 0.02% of nationwide GHG emissions, that we should not be required to meet the same goals for GHG emissions reductions as wealthier jurisdictions that have a higher contribution to the problem and greater economic capabilities.	While it may be true that Humboldt County does not have the same level of GHG emissions as other counties or metropolitan cities, this does not exempt our County from achieving the same GHG emissions reduction goals of other jurisdictions. Furthermore, in order for the RCAP to be enforceable, it needs to be a CEQA-qualified Climate Action Plan that shows how it will achieve reduction goals of 40% below 1990 levels, and an 85% GHG emissions reduction and separately carbon neutrality by 2045 by 2045. It is important to distinguish that 85% of direct emissions reductions must be achieved and up to 15% of emissions reductions can come from carbon removal or carbon sequestration. There must be real reductions in GHG emissions of 85%.
201-4	The comment states that Humboldt County is beyond carbon neutral, but is carbon negative due to naturally occurring carbon sequestration of our natural and working lands (e.g. forestlands, wetlands, and agricultural lands), which should be included in our GHG emissions reductions to achieve carbon neutrality by 2045.	See response to 201-3.
201-6	The comment states that the County should not send its carbon credits elsewhere, and should get credit for its carbon sequestration capacity and be allowed to build and grow a healthy self-sustaining economy.	It is agreed that the County should get credit for the carbon sequestration capacity of its natural and working lands. In order to do this, we need a study that is specific to Humboldt County to determine the naturally occurring carbon sequestration of our natural and working lands. We are currently working to obtain funding for developing this study.

Letter 201	Annje Dodd & Praj White Comment	Response
201-7	The comment states that the RCAP should account for all measures that the State already mandates local governments to comply with without requiring additional non-mandated measures that penalize the residents through taxes, fees, construction costs, electricity costs, etc.	The RCAP does include measures that are currently mandated by the State, many of which are included in the legislative adjusted scenario forecast. However, in order to reach the GHG emissions reduction targets in line with the State goals, additional measures are needed to achieve 40% below 1990 levels by 2030. As well, there are no plans to apply additional fees to the local community to implement the RCAP.
201-8	The comment suggests that the County's emissions do not contribute to the State or global concerns with GHG emissions, and therefore, the CEQA GHG emissions thresholds presented in the DEIR are not applicable to the County.	While Humboldt County may sequester more carbon than is emitted at the local level, there is currently no evidence to substantiate this claim. As well, in order for the RCAP to be in line with AB 1279 targets, the County is only able to apply up to 15% of GHG emissions reductions from carbon removal. It is completely reasonable for the County to adopt CEQA GHG emissions thresholds of significance in line with the RCAP.
201-9	The comment states that the RCAP and DEIR only provide streamlining for projects until 2030, and that there is no streamlining for projects beyond 2030. The comment further states that streamlining would be allowed for projects that can show consistency with the RCAP through a Compliance Checklist or showing consistency with GHG emissions thresholds, or would otherwise require further analysis, but that the Checklist has not been made available to show how it will evaluate project consistency with the RCAP. This comment concludes with asking if all other projects that cannot show consistency with the Checklist or GHG emissions thresholds, will they need to demonstrate carbon neutrality with costly mitigation measures?	It is correct that the RCAP and DEIR only provide streamlining for projects with an opening year between now and 2030, and that updates to the Compliance Checklist and GHG emissions thresholds will be needed to determine consistency with the RCAP 2030 update for projects with a post 2030 opening date. An update to the RCAP will occur by 2030 and any projects with a post-2030 opening date should work with the County to anticipate for and meet any future requirements. To correct the comment, if a project cannot show consistency with the Compliance Checklist, it would then need a detailed GHG emissions analysis to determine if it meets the set thresholds, or if mitigation is needed. If projects cannot show consistency through the checklist, or cannot show that they are below the thresholds through a detailed analysis, then yes, mitigation to the extent feasible will be required to show the level of significance with mitigation.
201-10	The comment states that the RCAP does not appear to allow streamlining for development in rural communities if they don't meet the definition for "infill", but that there is no definition for infill in the RCAP. The comment further states that the definition for infill should be	A definition for infill has been included in the RCAP to address this comment. The definition included was taken from the LCI which defines infill as "building within unused and underutilized lands with existing development patterns, typically but not exclusively in urban areas." RCAP Measure T-3 has been updated to identify infill priority areas as being

Letter 201	Annje Dodd & Praj White Comment	Response
	different for a rural county compared to larger urban counties like Los Angeles, San Francisco, or Sacramento, and that using “urban areas” to define infill is not sufficient and discriminates against the County’s rural communities.	within the urban areas in line with the US Census Bureau definition, shown in RCAP Figure 6 <i>Urban Areas of Humboldt</i> , and has been modified to be an Urban Measure and is only applicable to urban areas. Projects in rural areas would still need to comply with the General Plan and Zoning Code, and other measures that are applicable to rural areas.
201-11	This comment addresses RCAP Measure TR-3, now T-3, which is to “reduce regional VMT by increasing mixed-use in infill priority areas in alignment with HCAOG’s baseline connectivity score in the Regional Transportation Plan (RTP).” This comment asks what are infill priority areas, how will HCAOG’s connectivity score be applied, and how will this get incorporated into the checklist, and how will potential mixed-use and residential projects located within rural communities, urban clusters, and/or low VMT areas be streamlined and avoid costly documentation?	Looking into the baseline connectivity score in HCAOG’s RTP, it appears that this score will be identified through a study that is currently being finalized, and only includes the areas around Humboldt Bay. A change is being made to Measure T-3 to clearly identify that infill priority areas will include Urban Areas as defined by the US Census Bureau, and this measure will be updated as an urban measure. Mixed-use and residential projects within the urban areas that meet other applicable requirements of the RCAP would be able to streamline their GHG emissions analysis through showing compliance with the Compliance Checklist. Projects that are located in the final adopted low VMT areas will also be able to streamline their transportation analysis under CEQA. We anticipate the adoption of the VMT Threshold Policy in 2025.
201-12	This comment states that there is too much emphasis on reducing vehicle miles traveled (VMT), and with the State’s mandating the electrification of vehicles, VMT is becoming a less valid parameter for GHG emissions impacts. The comment further states that rural areas should not be penalized for the lack of transit or perceived VMT, and that it is infeasible for the rural communities to significantly reduce VMT to a level that would make a difference, especially when the County is carbon negative and emissions are insignificant when compared to the State.	While VMT may become less of a valid parameter with the electrification of vehicles, it will take time for this transition to occur to a level that would significantly reduce or eliminate GHG emissions from combustion vehicles, and VMT is currently still a valid parameter to use under CEQA to assess GHG emissions impacts. It is also understood that rural areas are limited in ways of effectively reducing VMT, and therefore the RCAP identifies measures for VMT reduction that are specific to rural areas to ensure that rural areas are not subject to infeasible measures.
201-13	This comment states that there is too much focus on eliminating natural gas in the RCAP and although electricity is cheaper for certain appliances, natural gas	While it may be true that the natural gas may be cheaper than electricity for certain uses and appliances, the measures in the RCAP to reduce natural gas consumption is in line with the State’s goal for electrifying new

Letter 201	Annje Dodd & Praj White Comment	Response
	is generally cheaper than electricity for heating and hot water.	buildings, and the upcoming changes that will be made to the building code on January 1, 2026.
201-14	The comment recommends that the RCAP consider rural communities when designating infill areas, and as the measures are written, new development in rural communities will be difficult and likely lead to increased isolation and further disadvantage the rural areas.	The RCAP is being updated to identify infill priority areas as being within urban areas of the RCAP. As well, Measure T-3 is being updated to T-3 <u>Urban</u> to ensure that rural areas are not held to the same standards as urban areas.
201-15	This comment states that there has been insufficient outreach to business owners, developers, property owners, and County residents, and states that the County should focus on better engagement with the community. The comment further mentions that the hybrid meetings that were conducted on the RCAP and EIR were hard to hear for the virtual attendees, and that in-person attendees could not hear comments from the virtual participants. Lastly, the comment state that the RCAP EIR Public Scoping meeting was not made available to the public as stated during the meeting.	There has been some outreach and discussion with the Redwood Region Economic Development Commission. As well, we have conducted several public meetings and hearings on the RCAP and the EIR. These meetings were advertised through notices in the Times-Standard, press releases and posting flyers on the County's social media accounts, and public meetings that were conducted allowed for question-and-answer sessions to address comments and concerns from the public. While hybrid meetings are prone to technical difficulties and don't always go smoothly, we feel that it is important to allow members to participate virtually. The RCAP EIR Public Scoping meeting recording has been made available, which can be found on the County website at www.humboldt.gov/climateactionplan , or https://www.youtube.com/watch?v=vv_fifzljE .
201-16	This comment is on the organization of the Regional Climate Committee and states that the committee should include representatives from businesses, agriculture, forestry, industry, tribes, and landowners.	As the RCAP is drafted, the Regional Climate Committee (RCC) will consist of elected officials from each jurisdiction, the HTA, the HCAG, HWMA, and RCEA. However, the RCC's decision-making process will include consultation with other advisory committees, local businesses, tribes, etc.
201-17	This comment states that the success of the RCAP depends on intense electrification, which will be challenging due to grid capacity limitations in the County. The comment includes the following questions: <ul style="list-style-type: none"> What happens if RCEA and PG&E do not meet their 100% renewable energy goals? Will new 	The RCAP does focus on moving away from direct fossil fuel use and increasing electrification of cars and buildings, and there is an understanding that grid improvements and expansions along with new microgrids will be required in order to facilitate this transitioning. Through adopting a regional CEQA-qualified CAP, the County and local jurisdictions will be better suited to obtain competitive grants to complete this work. RCEA has expressed that they are on track to meeting their 2030 target for

Letter 201	Annje Dodd & Praj White Comment	Response
	<p>development be on hold until these goals are met?</p> <ul style="list-style-type: none"> • What happens if the grid cannot keep up with the required electrification? If new construction requires all electric or to decarbonize and the infrastructure is not available, will new development be restricted? • Will the costs to upgrade the electrical infrastructure be passed onto users? Especially when prices are already extremely high. • The concerns regarding inadequate infrastructure and electrification are amplified in the rural parts of the County. Will rural areas be penalized for lack of infrastructure? 	<p>100% renewable energy. While the grid may not keep up with electrification, and the RCAP may not achieve the 2030 goals in its entirety, the RCAP will be updated prior to 2030 to show where the County is at with achieving the set targets and will include future implementation measures to reach the 2045 identified target for carbon neutrality. New development will not become restricted, but will require analysis under CEQA. The cost of electrical grid infrastructure is not anticipated to fall on the users, and Measure BE-8 includes advocating offshore wind developers to fund transmission infrastructure and work with PG&E, the California Public Utilities Commission, and other related agencies to build electrical infrastructure.</p>
201-22	<p>This comment concludes with stating that the County is a carbon sink and carbon negative, and that the RCAP and GHG emissions thresholds should focus on taking advantage of our carbon sequestration capacity and credits, and develop measures that allow for economic growth.</p>	<p>The County is currently working to obtain funding for a carbon stock study to identify Humboldt County's carbon sequestration capacity in order to receive credit towards GHG emissions reductions. However, since this information is not currently known through substantial evidence, measures in the RCAP need to show how they will meet reduction targets for 2030 in line with State goals. As well, in order for the RCAP to be in line with AB 1279 targets, the County is only able to apply up to 15% of GHG emissions reductions from carbon removal or carbon sequestration.</p>

Local Agency Comments Received:

Letter 301	Humboldt Bay Harbor District Comment	Response
302-2	The comment requests language changes to Appendix C <i>GHG Emissions Measure Reduction Quantification and Substantial Evidence Report</i> of the RCAP for Measure BE-8, to refine the information provided. The previous language conflated offshore wind generation projects with the Humboldt Bay Harbor District's Heavy Lift Marine Terminal project.	The language in Appendix C <i>GHG Emissions Measure Reduction Quantification and Substantial Evidence Report</i> of the RCAP for Measure BE-8 has been updated to correct these inaccuracies. These minor changes do not change the overall substantial evidence provided in Appendix C, or the measures of the RCAP.
302-3	The comment requests changes to the language included in Appendix B <i>GHG Inventory, Forecast and Targets Report</i> of the RCAP to be more accurate about offshore wind projects and associated transmission projects.	The language in Appendix B <i>GHG Inventory, Forecast and Targets Report</i> of the RCAP has been updated to refine the information provided. These minor changes does not change the overall calculations or methodology of Appendix B, or the RCAP.
302-6	The comment requests modifying and adding language to Measure BE-8 on page 41 of Appendix C <i>GHG Emissions Measure Reduction Quantification and Substantial Evidence Report</i> of the RCAP to accurately describe the planned Humboldt Offshore Wind generation projects and their potential contribution to electrical infrastructure upgrades.	The language changes have been made to page 41 of Appendix C <i>GHG Emissions Measure Reduction Quantification and Substantial Evidence Report</i> of the RCAP to accurately describe the planned Humboldt Offshore Wind generation projects and their potential contribution to electrical infrastructure upgrades. These modifications and additions do not change the overall substantial evidence provided in Appendix C, or the measures of the RCAP.

Late Comments Received:

Letter 401	Advocates for the Environment Comment	Response
401-3	The comment states that several GHG emissions reduction measures lack the specificity and clarity to ensure their effectiveness.	Some measures are written to leave specific action taken to achieve a measures goal up to the local jurisdiction that would be implementing the RCAP. This allows for a slight level of flexibility for each local jurisdiction to identify the appropriate actions to take for their specific jurisdiction. This, however, does not reduce the requirement to achieve the GHG emissions reductions identified in the RCAP. Additionally, the 2030 update to the RCAP will also update the measures to ensure that the ultimate target of carbon neutrality by 2045 is achieved.
401-4	This comment states that Measure BE-2 lacks concrete funding commitments to support its ambitious initiatives to develop micro-grids and energy storage, and to ensure the successful implementation it is critical to identify specific funding sources.	The current environment for funding is everchanging, and it is not possible to identify and obtain funding for implementing the RCAP prior to its adoption. Once the RCAP is adopted, the Regional Climate Committee and local jurisdictions will be able to identify and pursue the available funding to implement this measure.
401-5	This comment mentions that Action BE-6a of the RCAP includes exemptions and feasibility waivers which warrant further clarification.	Action BE-6a calls for each jurisdiction that adopts the RCAP to adopt an energy performance ordinance, energy design rating, reach code, or zero NOx threshold to decarbonize 95 percent of new buildings by 2027. The action states that the legislative process for building decarbonization should include the consideration of several potential exemptions and waivers, as outlined in 1 – 8 of Action BE-6a. Further clarification of the potential exemptions and waivers would not be known until specific actions are taken by each jurisdiction, and would depend on the decision-making body.
401-6	The comment states that Measure BE-6 directs each jurisdiction to adopt measures that curtail natural-gas infrastructure, but that the County has no legal authority to direct the cities to adopt such ordinances and claims that the effectiveness of the measure is in	Measure BE-6 calls on the RCC to develop a template ordinance that can be adopted by each jurisdiction. The measure calls for preparing a feasibility study to identify decarbonization barriers for commercial buildings. Part of the feasibility will be to examine legal pathways to address the court actions on this subject which may pose a challenge to decarbonization. There may be some regulatory schemes that need to be avoided as

Letter 401	Advocates for the Environment Comment	Response
	<p>question, which makes this measure unenforceable and violates CEQA.</p> <p>The comment further discusses the <i>California Restaurant Association v. City of Berkely</i> case and the US Court of Appeals decision to overturn Berkeley's natural gas regulation, and states that this case is not controlling because it regards the legislative authority of a municipal corporation to enact in building codes, rather than the authority under CEQA to mitigate significant environmental impacts of a project. The comment suggests that the County's ability to implement regulatory measures is different than Berkeley's preemption framework and that the County could regulate utility distribution so long as it does not modify building codes to prohibit natural gas.</p>	<p>acknowledged in the comment, but it is not beyond reason to expect that an approach can be crafted that meets the legal tests for adoption.</p> <p>Measure BE-6 is part of the RCAP which is intended to be separately adopted by each participating jurisdiction. This is not a matter of the County directing cities to adopt one or more ordinances. The individual cities are participants and will continue to be participants including having representation on the RCC.</p>
401-7	<p>This comment states that Measure T-11 lacks a clear standard because it includes the phrase "electrify or otherwise decarbonize," which may imply flexibility to meet the requirement through non-zero emission vehicle options, such as hydrogen fuel vehicles.</p>	<p>Measure T-11 clearly states that electrification or decarbonization of municipal fleets would be in alignment with the State's Advanced Clean Fleet Rule. Hydrogen vehicles are considered zero-emission vehicles (ZEV) under the California Air Resources Board's definition for ZEVs, which is "vehicles that produce zero tailpipe exhaust emissions of any criteria pollutant or greenhouse gas under all possible operational modes or conditions". Any other applicable decarbonization methods allowed under this measure would need to be in line with the Advanced Clean Fleet Rule.</p>
401-8	<p>This comment states that Measure CS-2 lacks a clear standard because Action CS-2a says that jurisdictions will "aim to exceed the baseline requirement by establishing a minimum level of compost application per year," but does not specify what the minimum level of procurement would be.</p>	<p>Measure CS-2 identifies the goal of achieving 0.08 tons of recovered organic waste per person by 2030. Page 92 of Appendix C <i>GHG Emissions Measure Reduction Quantification and Substantial Evidence Report</i> of the RCAP states that Measure CS-2 puts the region on a path to meeting the SB 1383 procurement targets (as much of the County is currently under CalRecycle approved waivers). This measure states that these Actions require more research, and further states that the Actions will allow the</p>

Letter 401	Advocates for the Environment Comment	Response
		jurisdictions to establish the supply and procurement to meet their annual procurement targets.
401-9	This comment states that the RCAP GHG inventory lacks evidence-based emissions reduction assumptions because it does not provide data to support the assumption that the County's GHG emissions declined more rapidly than the State.	Section 5.1 of Appendix B <i>GHG Inventory, Forecast and Targets Report</i> of the RCAP clearly states that Humboldt County does not have a 1990 GHG emissions inventory to develop reduction targets, but that emissions can be estimated using a state-level emissions change metric. This section further explains the calculations and accepted methodology used to determine local 1990 levels of GHG emissions.
401-11	The comment claims that the RCAP does not meet CEQA Guidelines Section 15183.5(b)(1)(D) because it does not demonstrate how measures would achieve a specified emissions reduction on a project-level basis. The comment further states that some projects could claim consistency with the Checklist and could evade further GHG review under CEQA.	CEQA Guidelines Section 15183.5(b)(1)(D) says "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." The RCAP demonstrates how it will achieve the specified emissions levels in Appendix C <i>GHG Emissions Measure Reduction Quantification and Substantial Evidence Report</i> and will be implemented on a project-by-project basis, therefore, it complies with CEQA Guidelines Section 15183.5(b)(1)(D). As well, the Checklist is not a separate policy document from the RCAP, but is an internal planning tool used to assess projects consistency with the RCAP, and some projects that show compliance through the checklist may still be required to conduct further GHG emissions analysis.
401-12	This comment states that there should be more focus on diversity within the implementation team in the RCAP and references the County's General Plan Policy G-S1, stating that it requires the county to consider social and economic effects on disadvantaged populations when assessing environmental impacts under CEQA. The comment also identifies the County's General Plan Policy G-P6, stating that it explicitly directs the County decision-making to avoid disproportionately impacting disadvantaged	G-S1 of the General Plan states "the County shall consider social and economic effects, including effects on disadvantaged populations, when assessing the significance of physical changes on the environment under CEQA pursuant to Section 15131(b) of the CEQA Guidelines." The RCAP is not a development project and does not propose any physical changes and is, therefore, not subject to Section 15131(b) of the CEQA Guidelines. As the RCAP is not a development project, it would not disproportionately impact disadvantaged populations. Lastly, the following measures in the RCAP include Actions that involve the engagement with disadvantaged and vulnerable communities: BE-2, T-9, T-10, and WW-2.

Letter 401	Advocates for the Environment Comment	Response
	populations, and concludes that the RCAP should require that efforts to reduce GHG emissions do not have a disproportionate effect on low-income, or minority groups.	