



COUNTY OF HUMBOLDT

For the meeting of: 10/16/2025

File #: 25-1236

To: Planning Commission

From: Planning and Building Department

Agenda Section: Public Hearing

SUBJECT:

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

Approval of the Humboldt Regional Climate Action Plan (RCAP) and California Environmental Quality Act (CEQA) Greenhouse Gas (GHG) Emissions Thresholds. The RCAP includes strategies, measures, and actions addressing Countywide GHG emissions across Unincorporated and Incorporated Humboldt County and establishes a target of a 40 percent reduction in GHG emissions below 1990 levels by 2030 and carbon neutrality by 2045. CEQA GHG Emissions Thresholds will be applicable to new development projects that require CEQA review and with a pre-2030 buildout or operational year.

RECOMMENDATION(S):

That the Planning Commission take the following actions:

1. Recommend that the Humboldt County Board of Supervisors take the following actions:
 - a) Adopt the Resolution [Attachment 1] to certify the EIR [Attachments 2 and 3] for the RCAP and CEQA GHG Emissions Thresholds including adopting findings of fact that the FEIR has been prepared in compliance with CEQA and Statements of Overriding Considerations; and
 - b) Adopt the Mitigation Monitoring and Reporting Program [Attachment 7]; and
 - c) Adopt the Resolution [Attachment 4] to make all required findings that the RCAP [Attachments 5A, 5B, 5C, and 5D] and CEQA GHG Emissions Thresholds [Attachment 6] are consistent with applicable policies, laws and regulations; and

- d) Adopt the RCAP and CEQA GHG Emissions Thresholds.

DISCUSSION:

Executive Summary:

The RCAP is a regional plan to reduce Countywide GHG emissions within the County and Incorporated Cities. The plan and CEQA GHG Emissions Thresholds were produced in partnership with the seven Cities of Arcata, Blue Lake, Eureka, Ferndale, Fortuna, Rio Del and Trinidad, and the Redwood Coast Energy Authority (RCEA), Humboldt Transit Authority (HTA), Humboldt Waste Management Authority (HWMA) and Humboldt County Association of Governments (HCAOG). The County facilitated preparation of the RCAP, CEQA GHG Emissions Thresholds and FEIR and will be the first agency to take action to certify the EIR and adopt the RCAP. Each of the seven cities will then adopt the plan.

In order to develop an appropriate baseline of GHG emissions, a Countywide 2022 GHG emissions inventory was completed, and this information was used in an approved state process to back-cast to identify 1990 GHG emissions. In order to achieve the requirement, set by AB32 to have a 40% reduction by 2030, the RCAP establishes, strategies, measures, and actions aimed at reducing Countywide GHG emissions 40 percent below 1990 levels by 2030. The RCAP also has an eye toward achieving the 2045 goals of an 85% reduction in GHG and to achieve. The 2030 GHG emissions target is consistent with the CEQA Guidelines Section 15183.5(b) for a qualified GHG emissions reduction plan. The RCAP contains 30 measures related to carbon-free energy, building energy use, transportation, waste, water/wastewater, carbon sequestration, and refrigerants. A cornerstone measure of the RCAP is creation of the Regional Climate Committee (RCC) to be composed of representatives from all partners to collectively obtain financing and achieve the objectives of the RCAP. Currently, there is potential for HCAOG to serve as the RCC. For the plan to be effective there should be one solidary plan established and implemented by all local jurisdictions invested in the RCAP.

CEQA GHG Emissions Thresholds are also being presented for adoption, which will be used to assess pre-2030 future development projects and their GHG emissions impacts under CEQA. These thresholds will be important in situations where a project cannot comply with the RCAP and requires preparation of a GHG emissions analysis. This will be used to determine whether the GHG emissions have the potential to cause a significant environmental impact.

A FEIR has been prepared to assess the potential impacts of implementing the RCAP and CEQA GHG Emissions Thresholds (SCH#2024081319) finding potentially significant and unavoidable impacts related to aesthetics, air quality, noise, utilities/service systems, cultural resources and Tribal cultural resources, and biological, agriculture and forestry resources. The Planning Commission is being asked to recommend that the BOS certify the FEIR and adopt the RCAP and CEQA GHG Emissions Thresholds.

Background:

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

The County, RCEA, and the incorporated Cities of Arcata, Blue Lake, Eureka, Fortuna, Ferndale, Rio Dell, and Trinidad began working on a multi-jurisdictional CAP in 2019, which later included collaboration with Humboldt County Association of Governments (HCAOG), Humboldt Transit Authority (HTA), and Humboldt Waste Management Authority (HWMA), referred to herein as the “Working Group.” Preparation of the RCAP included interviews with and review from the Working Group to refine measures and actions aimed at GHG emissions reductions. There was also a brief community survey that looked at community priorities for measures of the RCAP. A Draft RCAP was developed with 29 measures and released for 30-day public review on August 14, 2024, and a public meeting was held on September 10, 2024. Several public comments were received on the Draft RCAP which were discussed and considered at the Board of Supervisor’s (BOS) hearing on October 22, 2024. An update to the Draft RCAP was prepared to include BOS requested changes, which included one additional measure to address emissions from refrigerants. The updated draft of the RCAP with 30 measures served as the project for preparation of the Draft EIR (DEIR).

A Notice of Preparation for the RCAP EIR was filed with the State Clearinghouse on August 30, 2024, and a Notice of Completion was filed (SCH#2024081319) for the DEIR on February 7, 2025, which initiated a 45-day public review period from February 18, 2025, to April 5, 2025. A public scoping meeting was held on September 17, 2024, and a public meeting was held to discuss the DEIR on March 18, 2025. A total of five comment letters were received on the DEIR, which are included in the FEIR, and minor modifications were made to the RCAP through consideration of these comments. A FEIR (Attachment 2) has been prepared to assess the potential impacts of the RCAP and CEQA GHG Emissions Thresholds (SCH#2024081319) and was made available to the public on October 3, 2025.

A public workshop was held at the PC hearing on August 7, 2025, to discuss the RCAP structure, measures, and targets in detail, and the Staff Report for the public workshop is included as Attachment 8. The Planning Commission had requested a continuation of the workshop to allow a presentation of the measures included within the RCAP. We were not able to complete the workshop so staff will present, RCAP Table 32 *Implementation Work Plan* to go over the measures and actions in the RCAP with modified measures T-3 and T-4 for the Sustainable Communities Alternative.

The Humboldt RCAP

RCAP CEQA-Qualified Status for Streamlining

The RCAP has been prepared in accordance with CEQA Guidelines Section 15183.5(b) which allows the streamlining of GHG emissions analysis for projects requiring CEQA that can show consistency with the measures in the RCAP. Projects that are consistent with the RCAP measures (specifically, measures applicable to new development) would be presumed to have a less than significant impact to GHG emissions and would not require further analysis. A CEQA GHG Emissions Streamlining Checklist has been developed for this analysis (Attachment 9), which is an internal planning tool valid until 2030 to assess project consistency with the RCAP. The Checklist itself is not a policy document that requires review or comments. If a project cannot show consistency with the RCAP, further CEQA GHG emissions analysis is required to determine the level of impact.

CEQA GHG Emissions Thresholds

A part of the proposed action is to adopt quantitative CEQA GHG emissions thresholds for use in evaluating whether a future plan or project's GHG emissions would result in a potentially significant environmental impact under CEQA. The proposed thresholds would be applicable to projects with a pre-2030 buildout or operational year that require full CEQA analysis. Thresholds will need to be updated in 2030 along with the RCAP. Rincon Consultants prepared a *CEQA GHG Emissions Thresholds and Guidance Report* (Attachment 6), which calculates urban and rural quantitative GHG emissions thresholds for new-residential, new non-residential and new mixed-use development.

The thresholds were developed using accepted guidance provided by the Association of Environmental Professionals (AEP) for establishing GHG emissions efficiency thresholds using the local GHG inventory and demographic forecasts that were established in the RCAP. Explained in Section 5.1 *Thresholds Calculation Methodology* of the *CEQA GHG Emissions Thresholds and Guidance Report*, efficiency thresholds are expressed as a per-person metric (e.g., per resident, per employee, or per service population), and are calculated by dividing the allowable GHG emissions for 2030 by the number of anticipated residents, full-time employees, or service population in that year. The initial calculated thresholds are shown in Table 1 below.

Table 1. Humboldt Initial Urban and Rural GHG Emissions Thresholds

	2030 New Development		
	New Residential	New Non-Residential	New Mixed-Use ¹
Urban²			
GHG Emissions Forecasted (new MT CO ₂ e) ³	11,393	13,637	25,030
Demographic Metric	3,140 new residents	1,678 new employees	4,818 new service people ⁴
GHG Efficiency Threshold (MT CO ₂ e per demographic metric per year)	3.63 per resident	8.13 per employee	5.19 per service person
Rural⁵			
GHG Emissions Forecasted (new MT CO ₂ e) ³	15,670	16,041	31,711
Demographic Metric	4,284 new residents	1,967 new employees	6,251 new service people
GHG Efficiency Threshold (MT CO ₂ e per demographic metric per year)	3.66 per resident	8.16 per employee	5.07 per service person

Notes: MT CO₂e = metric tons of carbon dioxide equivalent

¹ GHG emissions from new mixed-use development would count against the total remaining GHG emissions budget for both new residential and new non-residential development rather than as a function of the number of new service people expected in 2030. This avoids double counting.

² Based on the RCAP definition, urban areas in Humboldt include Fortuna, Arcata, and Eureka as well as parts of unincorporated Humboldt County. However, due to data limitations related to obtaining exact demographic data for the area, Fortuna, Arcata, and Eureka were used as a proxy for urban areas in Humboldt to calculate the GHG emissions thresholds.

³ GHG Emissions Forecasted represent the new GHG emissions forecasted between 2019 and 2030. This also represents the allowable GHG emissions for each sector.

⁴ The service population is equal to the residential population plus the number of employees.

⁵ Based on the RCAP definition, rural areas in Humboldt include Blue Lake, Ferndale, Rio Dell, Trinidad, and parts of unincorporated Humboldt County. However, due to data limitations related to obtaining exact demographic data for the area, Blue Lake, Ferndale, Rio Dell, Trinidad, and unincorporated Humboldt County were used as a proxy for rural areas in Humboldt to calculate the GHG emissions thresholds.

As stated in the *CEQA GHG Emissions Thresholds and Guidance Report*, “If a plan or project’s emissions do not exceed the applicable threshold, then it is considered consistent with the RCAP and its GHG emissions impacts (both project- and cumulative-level) would not result in a cumulatively considerable impact related to GHG emissions and climate change and would, therefore, be considered less than significant. If a plan or project’s emissions exceed the applicable threshold, then

mitigation measures must be identified, and respective GHG emissions reduction calculations included within the respective CEQA review document in order to reduce plan or project GHG emissions to at or below the applicable threshold level. These thresholds are applicable to, projects requiring discretionary approvals) and that do not qualify for a categorical or statutory exemption.”

The threshold level are a decision point for the Planning Commission. The initial thresholds (100%) would set the County up to meet the 2030 target, but a lower threshold would better suit the County to meet the 2045 target. The 2030 target is a 40% reduction and the 2045 target is 85%. It is likely that further carbon reductions will be needed to achieve the 85% target. The emissions thresholds propose a 50% reduction which would set the projects developed between now and 2030 to be on track to achieve the 2045 reductions without further modification. The concern is that if no reduction is pursued, projects constructed between now and 2030 would need to be retrofitted to achieve the 2045 targets.

The 50% reduction is not based on substantial evidence that the 50% reduction is necessary to meet the 2045 target. It is a conservative proposal. A fair concern is that the 50% reduction may be too conservative. Staff is recommending the adoption of thresholds at 75% of the initial calculations (25% reduction). See Table 2 below and the comment and response #2 in the section on *Public Workshop Comments Received* below.

Table 2. Options for CEQA GHG Emissions Thresholds to be Adopted by RCAP Partners

	2030 New Development		
	New Residential	New Non-Residential	New Mixed-Use ¹
Urban²			
Option 1 (50%)	1.82 MT CO ₂ e per resident	4.07 MT CO ₂ e per employee	2.60 MT CO ₂ e per service person
Option 2 (75%)	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
Option 3 (100%)	3.63 MT CO ₂ e per resident	8.13 MT CO ₂ e per employee	5.19 MT CO ₂ e per service person
Rural³			
Option 1 (50%)	1.83 MT CO ₂ e per resident	4.08 MT CO ₂ e per employee	2.54 MT CO ₂ e per service person
Option 2 (75%)	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
Option 3 (100%)	3.66 MT CO ₂ e per resident	8.16 MT CO ₂ e per employee	5.07 MT CO ₂ e per service person

Notes: MT CO₂e = metric tons of carbon dioxide equivalent

¹ GHG emissions from new mixed-use development would count against the total remaining GHG emissions budget for both new residential and new non-residential development rather than as a function of the number of new service people expected in 2030. This avoids double counting.

² Based on the RCAP definition, urban areas in Humboldt include Fortuna, Arcata, and Eureka as well as parts of unincorporated Humboldt County. However, due to data limitations related to obtaining exact demographic data for the area, Fortuna, Arcata, and Eureka were used as a proxy for urban areas in Humboldt to calculate the GHG emissions thresholds.

³ GHG Emissions Forecasted represent the new GHG emissions forecasted between 2019 and 2030. This also represents the allowable GHG emissions for each sector.

⁴ The service population is equal to the residential population plus the number of employees.

⁵ Based on the RCAP definition, rural areas in Humboldt include Blue Lake, Ferndale, Rio Dell, Trinidad, and parts of unincorporated Humboldt County. However, due to data limitations related to obtaining exact demographic data for the area, Blue Lake, Ferndale, Rio Dell, Trinidad, and unincorporated Humboldt County were used as a proxy for rural areas in Humboldt to calculate the GHG emissions thresholds.

Public Workshop Comments Received

The following comments were received on the RCAP and CEQA GHG Emissions Thresholds at the Public Workshop held on August 7, 2025:

1. Request from RCEA to update language for their specified 2030 target for local and renewable energy.

Response: The requested changes have been made to the RCAP.

2. *Concerns regarding the proposed CEQA GHG Emissions Thresholds and why they were cut in half from the original calculations to be similar to adopted thresholds in urban areas. Request that thresholds be reasonable to rural Humboldt as this will be a precedent for thresholds adopted in other rural counties.*

Response: Concerns regarding the proposed CEQA GHG Emissions Thresholds have been considered. 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. 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.

3. *Concerns that the County's carbon credits are being sold elsewhere in the State and not being used towards GHG emissions reductions in the RCAP.*

Response: Carbon credits are being sold by private landowners to other jurisdictions in the State through the Cap-and-Trade program and are not currently being used in the RCAP to reach emissions reduction targets. There is currently no accepted methodology that calculates the carbon being sequestered by our natural and working lands for purposes of achieving the targets of a Climate Action Plan. The County is actively working towards developing a study for this to incorporate carbon sequestration into the 2030 update for the RCAP. In addition, the County is only allowed to use carbon sequestration for up to 15% of emissions reduction required to reach carbon neutrality by 2045.

4. *Request that the CEQA Streamlining Checklist be clear on project eligibility criteria for streamlining GHG emissions analysis and request to provide examples of different types of projects that would be allowed to streamline.*

Response: There is not an exhaustive list of projects. Projects that have a discretionary action and are thus subject to CEQA. Rather than focusing on the "Checklist" which is only a tool to implement the RCAP, the focus should be on the relevant policies of the RCAP.

5. *Request for an example or guidance on how to conduct a project-specific GHG emissions analysis.*

Response: As stated in Section 6 of the CEQA GHG Emissions Thresholds and Guidance Report, "There are a variety of analytical tools available to estimate project-level GHG emissions, including the California Emissions Estimator Model (CalEEMod), which is a free, publicly available computer model developed for the California Air Pollution Control Officers Association (CAPCOA) in collaboration with various air quality districts

throughout the State. Alternative tools may be used to quantify emissions if they can be substantiated.” If GHG analysis is needed for future projects because the project does not comply with the RCAP, the analysis will look very similar to the methodology currently implemented with the addition of thresholds for determining levels of significance.

6. *Request to consider removing the requirement for projects to be consistent with the General Plan and Zoning Code from the CEQA Streamlining Checklist and only require projects to be consistent with the RCAP in order to allow the streamlining of upzoning.*

Response: This point has been discussed in detail. It must be understood that the checklist is a screening tool used to determine projects which do not require additional GHG impact analysis. In some cases, the proposed change may result in a reduction in GHG emissions, but this may not always be the case. In litigation involving streamlining of GHG emission analysis the cases that have not been supported by the courts were found to not have General Plan and Zoning consistency as a prerequisite.

7. Concerns regarding the modification of Measure T-3 to only apply to urban areas and not rural areas of the County.

Response: This measure was modified to be an urban measure and not applicable to rural areas because the measure calls for increasing mixed-use development in infill priority areas. Infill priority areas have been identified as urban areas of the RCAP, in line with the Census Bureau’s definition of urban, and applying this measure in rural areas that are not applicable to infill priority areas would be unequitable. As well, this measure is strictly supportive and no GHG emissions reductions have been quantified, therefore, the modification of this measure does not affect the RCAP’s ability to reach 2030 targets.

Environmental Review for the RCAP and CEQA GHG Emissions Thresholds

A programmatic EIR has been prepared for the RCAP and CEQA GHG Emissions Thresholds and was circulated for public review pursuant to Sections 15080 through 15097 of the CEQA Guidelines. The programmatic EIR allows the tiering of future RCAP projects requiring full CEQA analysis (projects that specifically implement the RCAP, such as a large-scale organic waste processing facility, renewable energy projects, renewable fuel production projects and improvements to electric grid infrastructure) under CEQA Guidelines Section 15183.5(a). Tiering is defined under CEQA Guidelines Section 15152(a) as “using the analysis of general matters contained in a broader EIR with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating on later EIR or negative declaration solely on the issues specific to the later project.” Future RCAP projects that tier from the RCAP EIR would require subsequent CEQA analysis and may include new site-specific impact identification and potentially new mitigation measures.

The DEIR was filed with the State Clearinghouse (SCH#2024081319) and released for 45-day public

review from February 18, 2025, to April 5, 2025. The Draft EIR contains a description of the proposed project, description of the environmental setting, identification of proposed project impacts, and mitigation measures for impacts found to be significant, as well as an analysis of proposed project alternatives. The DEIR was provided to interested public agencies and the public and was made available for review on the County's website.

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

There are 10 identified significant and unavoidable impacts in the DEIR related to Aesthetics, Air Quality, Biological Resources, Agricultural and Forestry Resources, Cultural Resources, Tribal Cultural Resources, Noise, and Utilities and Service Systems even with mitigation; and there are six identified potentially significant impacts that can be reduced to a level of less than significant with mitigation related to Aesthetics, Air Quality, Biological Resources, Cultural Resources, Tribal Cultural Resources, and Noise.

Public and Agency Comments on DEIR

A total of five comment letters were received on the DEIR from various agencies and individuals. There is also a set of comments that were received at the public meeting at the Wharfinger building on March 18, 2025. Many of the comments received, however, were not on the DEIR but on the RCAP itself and minor modifications have been made to the RCAP through consideration of these comments. A full list of the comments received on the RCAP with Staff responses are included in Attachment 10.

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

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

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

Tribal Consultation

The following Tribes were contacted regarding the project:

- Bear River Band of the Rohnerville Rancheria
- Big Lagoon Rancheria
- Blue Lake Rancheria
- Cher-Ae-Heights Indian Community of the Trinidad Rancheria
- Elk Valley Rancheria
- Estom Yumeka Maidu Tribe of the Enterprise Rancheria
- Grindstone Rancheria of Wintun-Wailaki
- Hoopa Valley Tribe
- Karuk Tribe
- Melochundum Band of Tolowa Indians
- Pulikla Tribe of Yurok People
- Quartz Valley Indian Community
- Round Valley Reservation/Covelo Indian Community
- Scotts Valley Band of Pomo
- Shasta Indian Nation
- Tolowa Dee-ni' Nation
- Tsnungwe Council
- Wiyot Tribe
- Yurok Tribe

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

Alternatives

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

The Enhanced Carbon Sequestration Alternative 3 would revise RCAP Measures CS-1 to expedite the development of a carbon stock study by 2026 and the development and adoption of policies, programs and regulations for maintaining and enhancing carbon sequestration in natural and working lands and implement tracking mechanisms by 2027. Alternative 3 would also modify RCAP Measure CS-3 to expedite the completion of feasibility studies to assess the capacity and suitability of potential sites for industrial carbon sequestration by 2027 and require the County to initiate project planning and development processes based on the findings of the feasibility studies by 2030. Alternative 3 would also result in the inclusion of carbon sequestration from natural and working lands in the GHG inventory update sooner than the RCAP. This would demonstrate the extent to which the County's carbon stock is offsetting GHG emissions generated within Humboldt, thereby contributing to the achievement of the County's overall climate action goals by contributing to up to 15% of GHG emissions reductions required to achieve carbon neutrality by 2045. The remainder of the RCAP would also be implemented as laid out in the RCAP document, and Alternative 3 would meet the Statewide 2030 and 2045 GHG emissions reduction goal.

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

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

Statement of Overriding Considerations

Pursuant to Section 15093 of the CEQA Guidelines, the County may only approve a project with unavoidable significant impacts if specific economic, legal, social, technological, or other benefits,

including regionwide or statewide environmental benefits, of the project outweigh its unavoidable, adverse environmental impacts. The project would provide economic, legal, social, technological, regionwide and statewide environmental benefits as identified below.

1. Economic Benefits

Adoption of the RCAP may provide economic benefits, such as creating jobs, saving residents money on energy costs through efficiency measures, or by fostering new technologies. As well, adoption of the RCAP would increase the County's and other local government agency's ability to obtain funding for future projects to implement the RCAP. Adoption of the RCAP could provide important economic growth Countywide.

2. Legal Requirements and Policy Goals

Adopting the RCAP acts on Policy AQ-P9 and Implementation Measure AQ-IM3 of the Air Quality Element in the General Plan. The RCAP is a mitigation measure for the 2017 General Plan update, and adopting the RCAP is necessary to comply with state or regional mandates for reducing GHG emissions and to achieve broader environmental goals.

3. Social Benefits

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.

4. Technological Benefits

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.

5. Regionwide and Statewide Environmental Benefits

Adopting the RCAP would have significant regionwide benefits by addressing climate change issues such as reducing GHG emissions and increasing air quality, increasing the protection and management of natural and working lands, encouraging future restoration projects and increase biodiversity, and reducing wildfire risk. As well, the plan would allow the County and other local government agencies to work towards achieving state goals in line with SB 32 and therefore assist the state in reaching their overall goals for reducing GHG emissions and addressing Statewide climate change.

6. Infeasibility of Alternatives

The environmentally superior alternative to the RCAP, the Carbon Sequestration Alternative 3, was found to be infeasible due to increased timelines of RCAP implementation measures, and this alternative is not being recommended for adoption. However, the Sustainable Communities Alternative 2 is being recommended as many local jurisdictions are already working to achieve these goals.

Staff Recommendation

Staff is recommending that the Planning Commission recommend that the Board of Supervisors certify the EIR and adopt RCAP Sustainable Communities Alternative 2 and adopt CEQA GHG Emissions Thresholds at 75% of the initial calculations.

Project Location: All unincorporated areas of Humboldt County, including the Coastal Zone.

Present General Plan Land Use Designation: All land use designations.

Present Zoning: All zoning districts.

Environmental Review: An Environmental Impact Report (EIR) was prepared for the project (SCH#2024081319).

State Appeal: This project is not appealable to the California Coastal Commission.

OTHER AGENCY INVOLVEMENT:

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

ALTERNATIVES TO STAFF RECOMMENDATIONS:

1. The Planning Commission could elect not to recommend certification of the EIR and adoption of the RCAP and CEQA GHG Emissions Thresholds. This is however, not recommended as the RCAP would satisfy Policy AQ-P9 and Implementation Measure AQ-IM3 of the Air Quality Element in the General Plan.
2. The Planning Commission could elect to recommend the adoption of CEQA GHG Emissions Thresholds at 50% of the initial calculations, in line with the GHG emissions thresholds as presented.
3. The Planning Commission could elect to recommend the adoption of CEQA GHG Emissions Thresholds at 100% of the initial calculations, which would still be supported by substantial evidence provided by AEP guidance.

ATTACHMENTS:

1. Draft CEQA Resolution
2. Final EIR - <https://humboldt.gov.org/DocumentCenter/View/141773>
3. Draft EIR - <https://humboldt.gov.org/DocumentCenter/View/136011>
4. Draft RCAP & GHG Thresholds Resolution
- 5A. Humboldt Regional Climate Action Plan
- 5B. Appendix A Climate Regulatory Context
- 5C. Appendix B GHG Inventory, Forecast and Targets Report
- 5D. Appendix C Substantial Evidence Report

6. CEQA GHG Emissions Thresholds and Guidance Report
7. Mitigation Monitoring and Reporting Program
8. Public Workshop Staff Report August 7, 2025
9. Draft CEQA GHG Emissions Streamlining Checklist
10. Responses to Public Comments

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