

**CEQA ADDENDUM TO THE  
FINAL ENVIRONMENTAL IMPACT REPORT FOR THE  
2017 GENERAL PLAN UPDATE**

**Humboldt County General Plan Update Final Environmental Impact Report (EIR)  
(State Clearinghouse # 2007012089), September 25, 2017**

**APN 000-000-000 (Countywide)  
County of Humboldt**

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## **Summary of Document**

This addendum assesses the environmental impact(s) of the proposed adoption of a Mixed Residential Density Ordinance to allow up to 25 units per acre within Residential One-Family (R-1) and Residential Two-Family (R-2) zones in the Housing Opportunity Zone as required by the California Environmental Quality Act (CEQA) (California Public Resources Code 21000 et seq.) and in compliance with the State CEQA Guidelines (Title 14 California Code of Regulations 15000 et seq.). The original project was the Humboldt County General Plan Update, which was approved by the Board of Supervisors October 23, 2017.

The County, as the lead agency under CEQA, will consider the potential environmental impacts of the modified Project when it considers whether to approve these changes as part of the original Project. This Addendum is an informational document, intended to be used in the planning and decision-making process as provided under Section 15164 of the CEQA Guidelines. This Addendum recommends neither approval or denial of the proposed modification to the Project, nor will it be the sole basis for the County's action on the modified Project.

The fundamental conclusion of this addendum is that the proposed changes to the original Project will not result in new significant impacts nor substantially increase the severity of previously disclosed impacts beyond those already identified in the original Project. Thus, a subsequent or supplemental Environmental Impact Report need not be prepared.

## **California Environmental Quality Act (CEQA)**

This addendum analyzes the proposed Project modification as required under the CEQA Guidelines, Sections 15162 and 15164. Under CEQA Guidelines Section 15164, an addendum to an adopted EIR shall be prepared if some changes or additions are necessary, but none of the conditions described in Section 15162 calling for the preparation of a subsequent Negative Declaration or Environmental Impact Report (EIR) have occurred. Under Section 15162, the lead agency shall prepare a subsequent EIR if there are any new significant environmental effects associated with the refined Project or substantial changes proposed in the project which would require major revisions of the previous EIR or Negative Declaration.

## **Purpose**

With respect to the proposed Project, the Implementation Measure that this Ordinance fulfills will execute policy that has been incorporated in the Housing Element since at least 2014, Allowances for a Mixture of Housing Sizes and Types, and therefore the intended effects were analyzed as part of the General Plan EIR and the Ordinance will not result in any new significant environmental effects. That Implementation Measure is identified as H-IM61 in the 2019 Housing Element and the Policy is identified as H-P14 in the 2014 Housing Element and as H-P22 in the 2019 Housing Element. H-P14 (2014) and H-P22 (2019) are both titled "Allowances for a Mixture of Housing Sizes and Types" and intend for the County to

allow a variety of housing types and sizes in all residential areas served by public sewer to encourage a mix of housing opportunities for all income categories. The modified Project is consistent with the adopted EIR for the 2017 Humboldt County General Plan Update because it does not present substantial changes that would require major revisions to the previous EIR. No new information of substantial importance that was not known and could not be known at the time was presented, as described by Section 15162(c) of CEQA Guidelines.

## **Background**

### **Modified Project Description and Project History –**

The 2017 Humboldt County General Plan Update (GPU) renewed and modernized the County's Framework Plan. The policies, goals, and implementation measures therein express the county public's development goals. The update was developed in concert with the Final Environmental Impact Report (EIR) that was adopted September 25, 2017. The EIR addressed the broad environmental impacts that could be expected to occur from the adoption and implementation of the General Plan and included a Statement of Overriding Considerations which discussed how the economic, legal, social, and other benefits outweighed the unavoidable adverse environmental impacts identified by the EIR. The proposed project is consistent with the General Plan and all mitigation measures of the EIR. The General Plan included the 2014 Housing Element as Chapter 8, which was later updated to the 2019 Housing Element. As discussed in the Purpose above, the policy (H-P14) being implemented by H-IM61 was included in the 2014 Housing Element, therefore it was analyzed as part of the projections for the GPU EIR.

H-IM61 committed the County to amending the Zoning Regulations to allow higher residential densities and flexible housing configurations within Housing Opportunity Zones to address workforce housing needs for existing and new development. The Mixed Residential Density Ordinance establishes that, if certain standards and conditions are met, properties in the R-1 and R-2 zones can have an increased density of up to 25 units per acre and develop duplexes, triplexes, quadplexes, or apartments with five (5) or fewer dwelling units with only a building permit. Apartments with six (6) or more dwelling units would also require a Conditional Use Permit. The effects of the proposed ordinance update were contemplated by the EIR and compliance with the provisions of the Mixed Residential Density Ordinance will mitigate all environmental impacts of development associated with the ordinance to an equal (or reduced impact) level as analyzed by the GPU EIR.

The modified project is consistent with the adopted EIR for the 2017 General Plan Update because any resulting development shall comply with all mitigations which were intended to mitigate impacts of development and activity consistent with the General Plan and will not increase any of the identified impacts.

## Summary of Significant Project Effects and Mitigation Recommended

A review of Appendix G impacts:

Because the Mixed Residential Density Ordinance would only allow for more residences in zones which are already designed to permit residential development, the following impact categories will certainly not have any change in impact and will not be discussed further below: **Agricultural and Forestry Resources, Biological Resources, Cultural Resources, Geology / Soils, Hazards & Hazardous Materials, Hydrology / Water Quality, Mineral Resources, and Tribal Cultural Resources.**

The proposed ordinance has no means of reducing the overall impacts associated with the entire General Plan Update and is not site-specific, so the best possible result of each impact analysis is 'No Change'. The highest 'Significance After Mitigation' from each environmental impact factor from the GPU EIR is provided for informational purposes in parentheses after the analysis.

Many of the impact-specific analyses below are reliant on the following details; to limit repetition, these will be discussed here and referenced below. Population projections, provided by the Department of Finance, from 2016 and 2017 suggested a declining average annual growth rate but expected the County's population of roughly 135,000 to increase to 140,000 by 2025 and begin declining by 2030, but according to more current estimates by the Department of Finance, the actual populations were around 136,000 in 2020 and around 133,000 in 2024, so the earlier population projections supporting the analysis in the GPU EIR were higher than current metrics would indicate. The Department of Finance's current population projections suggest a population of roughly 123,000 in 2040.

With the following assumptions, roughly 120 parcels could be developed with additional units in accordance with this ordinance, comprising approximately 70 acres. Across that area, around 1,400 additional new units could be built, based on parcel size and subtracting the units that could already be built as primary dwelling units, second primary units, and accessory dwelling units on the existing parcels.

Assumptions:

- Vacant parcels are more likely to be developed and result in impacts than non-vacant parcels, so non-vacant parcels are not counted.
- Parcels in Streamside Management Areas and Wetlands (WR) Combining Zones with significant wetlands will not be developed. Any development that occurs on such sites would already require separate CEQA review.
- Sites within Airport Compatibility Zone 3 will not be developed at higher density than permissible by Table 3-2: Safety Compatibility Criteria, in Chapter 3 of the Humboldt County Airport Land Use Compatibility Plan (ALUC) (0.5 dwelling units per acre).
- Parcels in Greenway/Open Space (GO) Combining Zones will not be developed.

- Small parcels below the minimum lot width will not be developed.
- Sites predominantly featuring high slopes (greater than 15%) will not be developed.

Given that the current average number of persons per household in Humboldt County is 2.37 according to the US Census Bureau, the 1,400 units could support approximately 3,318 people. This would be an overestimation, considering the units developed in accordance with the proposed ordinance would likely be smaller than average and this assessment excludes the current number of units that could result from subdivisions of the existing parcels, but those considerations are balanced by some of the assumptions above. Considering the GPU expected 140,000 people in 2025, and 7,000 fewer people were observed in the 2024 population count, the analysis in the GPU EIR could easily support the impacts associated with 3,318 people if all the easily developable properties were built out. Additionally, the proposed ordinance does not incentivize additional housing, so it is not likely to spur significant additional development, regardless.

**Aesthetics:** Development of higher density housing in single-family neighborhoods could impact the aesthetic quality of such neighborhoods, so the proposed ordinance incorporates development standards intended to limit that impact. These standards include a requirement to incorporate elements that match the neighborhood, requiring landscaping for screening when adjacent to residentially developed properties, and height limitations based on the heights of off-site single-family residences within 20 feet. Humboldt County's mapped scenic vistas are all located within the Coastal Zone, and the proposed ordinance only applies to the Inland areas of Humboldt County. Mitigation Measure 3.16.3.1.a of the GPU EIR required Scenic Resources Standard #6 (SR-S6) of the General Plan, which requires the County to address the potential for significant impacts to scenic resources of Humboldt County Highways listed in Sections 263.1 through 263.8 of the California Streets and Highways Code during ministerial and discretionary permit review. Per Section 263.6(f) of the California Streets and Highways Code, the portion of Route 101 which travels through Humboldt County is included in the State scenic highway system. Although Route 101 travels through or adjacent to several Housing Opportunity Zones, any development in accordance with the proposed ordinance will require the scrutiny associated with SR-S6, in the same manner as any other ministerial or discretionary permit. Any development associated with the proposed ordinance will also be required to comply with the Outdoor Lighting code in Section 314-105.1 of Humboldt County Code, which implemented Mitigation Measure 3.16.3.3.a of the GPU EIR. The proposed change to the code should not result in a substantial change or additional significant impact that had not been considered under the EIR for the GPU. **No change (Significant and Unavoidable Impacts).**

**Air Quality:** Higher density development can result in an increase in localized vehicle-borne pollutants and dust associated with excavation and grading for development. The GPU EIR considered these impacts based on the population projections discussed above, so the measures in the GPU would be applicable to the potential increase in population that this ordinance could support. The vehicle emissions along roadways are still considered

temporary impacts to nearby sensitive receptors and would therefore remain a less than significant impact. Residential development is not associated with the emission of objectionable odors. The proposed change to the code should not result in a substantial change or additional significant impact that had not been considered under the EIR for the GPU. **No change (Significant and Unavoidable Impacts).**

**Energy:** New development resulting from the code changes in the proposed ordinance may result in increased energy usage due to the increased number of dwelling units. This increase in energy usage will not inherently be inefficient or unnecessary during construction or ongoing occupancy. Such development will not conflict with or obstruct State or local plans for renewable energy or energy efficiency. Based on the details above, the projected energy usage for residential uses is unlikely to be increased. The proposed change to the code should not result in a substantial change or additional significant impact that had not been considered under the EIR for the GPU. **No change (Significant and Unavoidable Impacts).**

**Greenhouse Gas Emissions:** Increased energy usage may result from new development permitted by the code changes proposed by this project, which typically bears the risk of increased greenhouse gas emissions. Based on the details above, the projected energy usage for residential uses is unlikely to be increased beyond what had been estimated for the GPU EIR. The proposed change to the code should not result in a substantial change or additional significant impact that had not been considered under the EIR for the GPU. **No change (Significant and Unavoidable Impacts).**

**Land Use and Planning:** Although the proposed ordinance would override the planned densities for the Land Uses described in Chapter 4 of the General Plan Update (Land Use Element), H-P14 from the 2014 Housing Element (Chapter 8 of the General Plan Update) proposed higher density development within the Housing Opportunity Zones, so the density increase would not be inconsistent with the General Plan overall. **No change (Less than Significant Impacts).**

**Noise:** As discussed in the GPU EIR, noise associated with traffic depends primarily on the speed of traffic and the percentage of truck traffic. Any increases in traffic that may result from development associated with the proposed ordinance would have no increase in speed, nor will percentage of trucks be increased. Short-term, construction-related noise may result from the proposed code changes, which, as discussed in the GPU EIR, would typically range at maximum from 70 decibels (dBA) to nearly 100 dBA at a distance of 50 feet. Although construction activities can vary in duration, they are nonetheless temporary in nature and typically occur during normal daytime working hours. **No change (Less than Significant Impacts).**

**Population and Housing:** The proposed ordinance includes terms requiring that, if demolition of existing housing is proposed or had occurred within the past five (5) years on a site utilizing the ordinance to develop higher density housing, those dwelling units are required to be

replaced on a one-for-one basis, so no removal of housing may occur as a result of the ordinance. Considering that the proposed ordinance lacks incentives to develop additional housing and the current and projected County population is less than what was analyzed for the GPU EIR, the proposed ordinance is unlikely to induce substantial population growth, displace housing, or displace people. **No change (Less than Significant Impacts).**

**Public Services:** The use of public services, such as schools, fire protection, and law enforcement, is proportional to population. As discussed above, the potential population the proposed ordinance may accommodate is less than the projected population discussed in the GPU EIR because the County is experiencing slowing or negative population growth, so no impacts from the proposed ordinance would be unaccounted for by the EIR. **No change (Less than significant impacts).**

**Recreation:** The use of parks and recreation facilities is proportional to population. As discussed above, the potential population the proposed ordinance may accommodate is less than the projected population discussed in the GPU EIR because the County is experiencing slowing or negative population growth, so no impacts from the proposed ordinance would be unaccounted for by the EIR. The proposed ordinance does not include or require the construction or expansion of recreational facilities which might have an adverse effect on the environment. **No change (Less than Significant Impacts).**

**Transportation:** Consistent with the GPU EIR, the proposed ordinance permits additional growth specifically within existing communities, which should reduce vehicle trips and trip length. Number of vehicles on the road increases proportionally with population growth. As discussed above, the potential population the proposed ordinance is likely to accommodate is less than the projected population discussed in the GPU EIR, so no impacts from the proposed ordinance would be unaccounted for by the EIR. **No change (Significant and Unavoidable Impacts).**

**Utilities and Service Systems:** Population growth places additional demands on wastewater treatment facilities, water infrastructure, and landfill capacity. As discussed above, the potential population the proposed ordinance is likely to accommodate is less than the projected population discussed in the GPU EIR, so no impacts from the proposed ordinance would be unaccounted for by the EIR. **No change (Significant and Unavoidable Impacts).**

**Wildfire:** The proposed code would not create exceptions overriding any of the codes and standards that have been established to reduce exposure to other safety hazards, such as wildfires. **Less than significant impact.**

No changes are proposed for the original EIR recommended mitigation measures. The proposal to adopt the Mixed Residential Density Ordinance is fully consistent with the impacts identified and adequately mitigated in the original EIR. The project results in no significantly adverse environmental effects beyond those identified in the EIR.

## **Other CEQA Considerations**

Staff suggests no changes for the revised project.

## **EXPLANATION OF DECISION NOT TO PREPARE A SUPPLEMENTAL MITIGATED NEGATIVE DECLARATION OR ENVIRONMENTAL IMPACT REPORT**

See Purpose statement above.

In every impact category analyzed in this review, the projected consequences of the current project proposal are either the same or less than significantly increased than the initial project for which the EIR was adopted.

Based upon this review, the following findings are supported:

### **FINDINGS**

1. The proposed project will allow permitting of multifamily structures at a density of up to 25 units per acre within Residential One-Family (R-1) and Residential Two-Family (R-2) zones in Housing Opportunity Zones while maintaining County and State requirements intended to adequately mitigate environmental impacts.
2. The circumstances under which the project was approved have not changed substantially. There are no new significant environmental effects and no substantial increases in the severity of previously identified effects.
3. For the current proposed project, there has been no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was adopted as complete.

### **CONCLUSION**

Based on these findings it is concluded that an Addendum to the previous Final EIR is appropriate to address the requirements under CEQA for the current project proposal. All the findings, mitigation requirements, and mitigation and monitoring program of the EIR, remain in full force and effect on the original project.

There are no new significant environmental effects and no substantial increases in the severity of previously identified effects. For the current proposed project, there has been no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was adopted as complete.