



Adoption of Robust Regional Climate Action Plan

From Mary Hurley <hurleymch@gmail.com>

Date Sat 12/6/2025 12:50 PM

To COB <COB@co.humboldt.ca.us>; Wilson, Mike <Mike.Wilson@co.humboldt.ca.us>

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Hello,

I am submitting a written comment in advance of the 12-16-25 Board of Supervisors' meeting. I urge the Board to adopt the Regional Climate Action Plan without delay and without weakening it. Please revert the CEQA GHG thresholds of significant to the original level analyzed and recommended by the RCAP consultants. I believe economic development is still possible with the original thresholds kept in place. Our region must do everything we can to mitigate the effects of climate change. Economic development certainly won't be possible with the potentially devastating sea level rises predicted for our area unless we double down on regional efforts working with the State of CA to reduce GHG emissions.

Thank you.

Mary Hurley
hurleymch@gmail.com





Outlook

Humboldt County Board of Supervisors and Climate Plan

From Lesley Stansfield <lesleys460@gmail.com>

Date Sat 12/6/2025 12:02 PM

To COB <COB@co.humboldt.ca.us>

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Although I am not able to attend the meeting on Dec 16, I urge you to Adopt a Robust Regional Climate Action Plan. It has taken way too long and is way overdue. Do it now!

Lesley Stansfield

Healdsburg, Ca



Outlook

RCAP

From Susan Worden <cocoa.charlot@gmail.com>

Date Sat 12/6/2025 3:44 AM

To COB <COB@co.humboldt.ca.us>

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Please adopt the Regional Climate Action Plan without delay and without weakening it.

Please revert the CEQA GHG thresholds of significance to the original level analyzed and recommended by the RCAP consultants. CEQA is enormously important and should not be diminished in any way.

Susan Worden



Outlook

Adopt the Regional Climate Action Plan

From Sue Y. Lee <syl1@humboldt.edu>

Date Sat 12/6/2025 1:51 AM

To COB <COB@co.humboldt.ca.us>


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Dear Supervisor Madrone,

I ask that you approve the Regional Climate Action Plan, after making a few key changes. Here are our specific requests:

- Adopt greenhouse gas thresholds at the original levels recommended by the consultant, and reject the Planning Commission's attempt to weaken this key standard for projects that aren't compliant with the plan. ([Check out EPIC's great explanation of this issue here.](#))
- Please revert the CEQA GHG thresholds of significance to the original level analyzed and recommended by the RCAP consultants.
- Ensure that only low-emission infill development projects will be considered compliant with the plan, so that high-emission rural developments aren't exempted from analyzing and mitigating their climate impacts.
- Adopt and implement the plan without delay and without weakening it

We have waited 8 years for a regional Climate Action Plan that addresses rising global climate pollution and the impacts of severe climate changes.

Thank you for your support,
sue y lee mossman
archie mossman




Outlook

RE: RCAP adoption for Humboldt County

From AJ <amenoartemis@gmail.com>

Date Fri 12/5/2025 10:13 PM

To COB <COB@co.humboldt.ca.us>

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Dear Humboldt County Board of Supervisors:

Please adopt the Regional Climate Action Plan without delay and without weakening it, and revert the CEQA GHG thresholds of significance to the original level analyzed and recommended by the RCAP consultants. Humboldt County deserves a robust climate response plan, not softened regulations that favor for-profit energy and building projects over community resilience.

Regards,

AJ cho

Sent via [Wildhero](#) - email that plants trees.



Outlook

RE: RCAP adoption for Humboldt County

From AJ <amenoartemis@gmail.com>

Date Fri 12/5/2025 10:13 PM

To COB <COB@co.humboldt.ca.us>

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Dear Humboldt County Board of Supervisors:

Please adopt the Regional Climate Action Plan without delay and without weakening it, and revert the CEQA GHG thresholds of significance to the original level analyzed and recommended by the RCAP consultants. Humboldt County deserves a robust climate response plan, not softened regulations that favor for-profit energy and building projects over community resilience.

Regards,

AJ cho

Sent via [Wildhero](#) - email that plants trees.



Outlook

comment on RCAP

From Wendy Ring <wring123@gmail.com>

Date Fri 12/5/2025 4:54 PM

To COB <COB@co.humboldt.ca.us>

 1 attachment (9 KB)

BOS comment on RCAP.docx;

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Please include attached comment for upcoming supes meeting.

Public Comment on RCAP for BOS 12/16 meeting

Please approve the RCAP with two modifications. While it is not everything it could be, we can't afford further delay and I'm anxious to see our county move forward on climate action. There are only two things I believe are essential to correct right away:

- 1) the last minute change in the CEQA GHG threshold of significance, which should be returned to the original level analyzed and recommended by the RCAP consultants
- 2) inclusion of local biofuel and hydrogen production from waste as an RCAP measure

GHG THRESHOLD

A review of California statutes makes it clear that potential effects on economic development are not legally permissible criteria for a threshold of significance.

Cal. Code Regs. Tit. 14, § 15064.7 (b) Thresholds of Significance

(b) Thresholds of significance to be adopted for general use as part of the lead agency's environmental review process **must be ...developed through a public review process and be supported by substantial evidence.**

Cal. Code Regs. Tit. 14, § 15384 - Substantial Evidence

(a) Argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or **evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence.**

A new home in California will last at least 70 years. The lifetime of a new commercial building is 50-80 years. On our current trajectory of emissions and international commitments, global warming will surpass 2 degrees in 25 years. We cannot let developers and other special interests delay and water down climate action for their short term profit.

BIOFUEL

Production of biofuel and hydrogen from waste falls under a CEQA exemption in SB 131, a budget rider primarily intended to prevent CEQA from being used to stop affordable housing. It also included a CEQA exemption for Advanced Manufacturing which includes production of biofuel, bioplastic, biopharmaceuticals, and hydrogen (many co-produced by the same method) by means of fermentation with genetically modified bacteria and by pyrolysis and gasification. Along with waste wood, additional feedstock can include garbage and sewage sludge. While LCFS makes biofuel and biohydrogen lucrative, their production emits air pollution and large amounts of greenhouse gas which contribute to global warming for decades before they can be reabsorbed, decades during which global warming will reach catastrophic levels.

John Ford told me that local jurisdictions have no authority to consider environmental impacts of projects that are exempt from CEQA. He wasn't aware of the advanced manufacturing exemption in SB 131 when he assured the Planning Commission that all industrial projects would undergo local environmental review. With the current CEQA exemption, the county would not be able to stop siting

of such projects on any industrially zoned parcel on environmental grounds. Promises to fix this exemption in the last legislative session were not kept. It may happen in the future but the timber industry has a strong lobby so it is far from guaranteed. Providing any encouragement for dirty CEQA-exempt industries to locate here is extremely ill advised.

I suspect that the biofuel measure was thrown into the RCAP without substantial knowledge or investigation into whether or not this is something that would really be beneficial for the climate or our community. The RCAP contains many proven climate solutions which promote public health and equity. Biofuel production by "advanced" methods is unproven economically and environmentally at commercial scale. It is foolhardy to encourage this industry to come here while the county is powerless to prevent its environmental impacts. This RCAP measure is not quantitative so its elimination is simple. Please just drop it.

Wendy Ring



Outlook

Ensure in-fill development is prioritized

From Jesse <jesseshoghi@proton.me>

Date Fri 12/5/2025 3:37 PM

To COB <COB@co.humboldt.ca.us>

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Hello,

My name is Jesse Shoghi, I live at 1814 A St. in Eureka, and I'm aware that a vote will be held soon on the Regional Climate Action Plan. I think it's fantastic that this plan is finally going to be adopted, however I want to add my voice to the others that are hoping for In-Fill development to be prioritized over rural expansion on the fringes of our city.

There are many fantastic projects already underway on old un-used city owned parking lots, and we should continue to both preserve our natural beauty of Humboldt and prioritize dense development, the kind that has been proven to contribute to safer, cleaner, and more economically stable communities.

Thank you for helping to make Eureka better, and I'm excited for projects like the EARTH center to be complete!

Sent with [Proton Mail](#) secure email.

Adopt the Regional Climate Action Plan

From Joseph <jz93@humboldt.edu>

Date Fri 12/5/2025 1:32 PM

To COB <COB@co.humboldt.ca.us>

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Supervisors,

I'm writing to urge you to adopt a strong Regional Climate Action Plan on December 16th—one that recognizes the scale of our climate obligations and the central role transportation plays in meeting them. Nearly three-quarters of the emissions covered by the plan come from on-road transportation. Achieving our climate goals requires decisive action to expand public transit, improve walkability and bikeability, and support compact infill development that reduces vehicle dependence.

The Regional Climate Action Plan has been many years in the making. While not perfect, it represents a critical step toward reducing emissions, improving public health and safety, and building a more resilient Humboldt County. To ensure the plan is as effective as possible, I respectfully request that the Board:

1. Reinstate the original greenhouse gas thresholds recommended by the consultant and reject the Planning Commission's proposed weakening of this essential standard.
2. Ensure that only low-emission infill development is deemed compliant with the plan, so that high-emission rural development does not bypass meaningful climate analysis and mitigation.
3. Adopt and implement the plan without delay or further weakening.

Meeting our climate goals depends on creating communities where walking, biking, rolling, and riding transit are safe, convenient, and appealing. These shifts not only reduce emissions—they also improve safety, support local economic vitality, address housing needs, and strengthen quality of life. Recent events, including the serious pedestrian injury on 4th Street, underscore the urgency of redesigning our streets for the safety of all users.

With new staff and a regional climate action committee soon to be established, Humboldt County has an opportunity to lead. Please adopt a robust plan and commit to the infrastructure, land-use, and transportation choices that will allow our communities to thrive while reducing climate pollution.

Thank you for your attention and for your work on this important issue.

--

~ Joseph Zazo



Outlook

Climate Change

From Caephren McKenna <caephren@gmail.com>

Date Fri 12/5/2025 12:06 PM

To COB <COB@co.humboldt.ca.us>

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Please Adopt a Robust Regional Climate Action Plan.

Thank you,

Caephren McKenna



Outlook

Adopt a Robust Regional Climate Action Plan

From Doğan Özkan <barisicindogan@gmail.com>

Date Fri 12/5/2025 10:44 AM

To COB <COB@co.humboldt.ca.us>

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

It's finally here! No, not Christmas – the final County-level approval for the Humboldt County Regional Climate Action Plan (RCAP). The document, which the County has been working on since 2018, will guide Humboldt's climate mitigation efforts for the next several years.

Dogan ozkan



Outlook

Please adopt a strong Regional Climate Action Plan without delay

From Brad Marston <bradmarston@icloud.com>

Date Fri 12/5/2025 10:29 AM

To COB <COB@co.humboldt.ca.us>

Cc Brad Marston <bradmarston@icloud.com>

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Dear Humboldt County Board of Supervisors:

I lived in Arcata during the first half of 2025, and plan to move there in the near future. I am a climate physicist at Brown University where I conduct research experiments on enhanced rock weathering to remove atmospheric carbon dioxide. I have plans to startup a business focused on this work in Humboldt County. This is the type of forward-looking businesses that the county should encourage, rather than backwards and frankly primitive continued fossil-fuel intensive uses.

I ask you to please adopt the Regional Climate Action Plan (RCAP) without delay, and without weakening it. Please revert the CEQA GHG thresholds of significance to the original level analyzed and recommended by the RCAP consultants.

Sincerely,

Brad Marston

[REDACTED]

[REDACTED]

Public Comment for December 16 Board of Supervisors meeting

From Ann Dorsey <aedorsey@hotmail.com>

Date Sat 12/6/2025 5:17 PM

To COB <COB@co.humboldt.ca.us>

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Humboldt County Board of Supervisors,

I urge you to adopt a robust Regional Climate Action Plan (RCAP) for Humboldt County. Specifically, make the CEQA GHG thresholds of significance the original level analyzed and recommended by the RCAP consultants, refrain from making it weaker in any other way and adopt it without delay.

After years of work, public engagement, and technical analysis the County hired consultants drafted a RCAP. When deciding what the thresholds of significance for GHG emissions would be they followed CEQA guidelines, that the thresholds must be supported by substantial evidence and adopted through a transparent public process.

At a County Planning Commission meeting on October 16th, the Commission arbitrarily decided to increase the CEQA GHG thresholds by 50% (allowing projects to generate 50% more emissions before it would be considered a significant environmental impact under CEQA) because they were worried that too low a threshold could stymie economic development.

The Commission's action completely subverted the work of the RCAP consultants and is troubling in many ways. By changing the threshold of significance without considering the environmental impacts of doing so and without any substantial evidence, the Planning Commission violated CEQA. When an agency proposes changes that would result in new significant impacts or a substantial increase in the severity of previously identified impacts, which increasing the GHG threshold by 50% thereby allowing more GHG emissions would do, recirculation or a subsequent environmental review is required, which has not been done. Furthermore, the assumption that setting a lower (more strict) threshold of significance would stymie economic development is incorrect, because projects that have a significant impact on the environment can still be approved via a statement of overriding considerations.

Please keep the County compliant with CEQA and protect our communities by approving a strong RCAP that retains the CEQA GHG thresholds of significance recommended by the RCAP consultants without delay.

Thank you,

Ann Dorsey



Outlook

Regional County Action Plan

From Xenia Bixler <xenia.bixler@gmail.com>

Date Mon 12/8/2025 12:32 PM

To COB <COB@co.humboldt.ca.us>

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

I respectfully request the County Supervisors do the following at their next meeting;

- Please adopt the Regional Climate Action Plan without delay and without weakening it
- Please revert the CEQA GHG thresholds of significance to the original level analyzed and recommended by the RCAP consultants

Thank you, Xenia Bixler,



Outlook

Urge Adoption of a Robust Regional Climate Action Plan

From Lee Dedini <dedinilee@gmail.com>

Date Tue 12/9/2025 8:07 PM

To COB <COB@co.humboldt.ca.us>

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To whom it concerns,

I can remember, seven years ago, when the Board of Supervisors said it would be done. I am asking, please adopt the the Regional Climate Action Plan without delay and without weakening it.

And please revert the CEQA Green House Gas thresholds of significance to the original level analyzed and recommended by the RCAP consultants.

Thank you,
Lee Dedini

[REDACTED]

[REDACTED]



Outlook

Adopt the RCAP! But

From Gina Rogers <gina.rogers72@gmail.com>

Date Tue 12/9/2025 10:14 AM

To Wilson, Mike <Mike.Wilson@co.humboldt.ca.us>

Cc COB <COB@co.humboldt.ca.us>

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A strong Climate Action Plan needs to be a HIGH HIGH HIGH priority for Humboldt County. I strongly urge you to adopt the Humboldt County Regional Climate Action Plan (RCAP) without delay. But please ensure that the Planning Council's weakening provisions are not included. Please vote for an RCAP that restores the CEQA GHG thresholds of significance to the original level analyzed and recommended by the RCAP consultants.

Thank you.

Virginia (Gina) Rogers

[REDACTED]

[REDACTED]

Climate Action Plan

From Cathy ChandlerKlein <cathyck@sbcglobal.net>

Date Tue 12/9/2025 8:10 AM

To Bohn, Rex <RBohn@co.humboldt.ca.us>; Bushnell, Michelle <mbushnell@co.humboldt.ca.us>; Wilson, Mike <Mike.Wilson@co.humboldt.ca.us>; Arroyo, Natalie <narroyo@co.humboldt.ca.us>; Madrone, Steve <smadrone@co.humboldt.ca.us>; COB <COB@co.humboldt.ca.us>

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Dear Supervisors:

A local request:

- *Please adopt the Regional Climate Action Plan without delay and without weakening it.*
- *Please restore the CEQA GHG thresholds of significance to the original level analyzed and recommended by the RCAP consultants.*

A state level request:

Please use your influence on Humboldt's state legislators to get AB 1242 passed to the Senate in January:

- *AB 1242, the Make Polluters Pay law, follows the logic of superfund sites: polluters must pay to clean them up. In this case the polluters are the fossil fuel manufacturers who have create 80% the greenhouse gases which are causing sea level rise and more severe wildfires. The bill requires they pay part of the costs of adapting to the impacts of global warming here in California.*

Thank you,

*Cathy Chandler-Klein
Arcata resident*



Outlook

Climate Change agreement

From Patty Gomez-Gillard <dogenz@icloud.com>

Date Tue 12/9/2025 6:32 AM

To COB <COB@co.humboldt.ca.us>

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Dear council members,

I am writing to thank you for your efforts in creation of a county climate change agreement and as a county resident, I support this agreement.

Thank you

Pat Gomez

Sent from my iPhone



Sent via Email to cob@co.humboldt.ca.us,

Date: December 11, 2025

To: Humboldt County Board of Supervisors
Supervisor Mike Wilson, Chair
Tracy Damico, Clerk of the Board
825 5th Street, Eureka CA, 95501

CC: Director Ford, Planner Acevedo

From: Environmental Protection Information Center (EPIC) and Coalition for Responsible Transportation Priorities (CRTP)

Agenda Item: Humboldt Regional Climate Action Plan and CEQA GHG Emissions Thresholds

Re: Please Restore The Originally Recommended CEQA GHG Thresholds of Significance, Clarify Infill Standards, & Approve the RCAP

I. Introduction & Summary

The Environmental Protection Information Center (EPIC) is a 501(c)3 environmental nonprofit based in Arcata, California. EPIC has been defending the North Coast of California's forests, rivers, and wildlife since 1977. EPIC believes that mitigating climate change is absolutely essential to our mission as climate change poses a significant threat to North Coast ecosystems. The Coalition for Responsible Transportation Priorities (CRTP) is a 501(c)3 nonprofit focused on transportation safety, equity, and sustainability, and advocates for a transition to a zero-carbon transportation system.

A Climate Action Plan provides the scientific and policy foundation for: (1) Establishing a clear baseline of county-wide emissions; (2) Identifying feasible greenhouse gas (GHG) reduction strategies; (3) Aligning County policy with state climate laws; and (4) Determining project-level consistency with statewide GHG reduction trajectories. For that reason, it is essential that the RCAP be effectively designed to positively influence future development in Humboldt County.

While EPIC and CRTP support the adoption of the RCAP, two issues must be addressed first: setting an appropriate greenhouse gas threshold of significance, and clarifying infill development standards.



a. The RCAP Should Utilize the CEQA GHG Emissions Thresholds Recommended by Rincon

A significant change was made to the plan at the October 16th Humboldt County Planning Commission meeting that must be undone. The Planning Commission, on a 3-2 vote on this particular subject, recommended that the California Environmental Quality Act (CEQA) greenhouse gas (GHG) thresholds of significance be raised 50% above the level recommended by Rincon Consultants, Inc. (Rincon), the consultants hired by the County to write the RCAP. This change would allow projects to generate 50% more GHG emissions before that would be considered a significant environmental impact under CEQA. The RCAP allows future projects to tier to the CEQA GHG analysis in the RCAP EIR if the project's GHGs are below this threshold of significance.¹ That means the RCAP could inadvertently streamline projects that cause significant climate pollution – contrary to the entire purpose of the RCAP. Importantly, Rincon stated in their analysis that a higher CEQA GHG emission threshold would “allow for higher GHG emissions from development than is necessary with existing development techniques and equipment.”² Rincon based this statement on an analysis of the emission reduction strategies and thresholds adopted in other communities in California.³ So, arguments that the proposed threshold would stifle development are without merit. Furthermore, adopting the recommended, stricter threshold would “better position Humboldt for an efficient pathway to achieve the long-term 2045 target and align with GHG emissions thresholds seen throughout the State.”⁴ Instead of building projects today that emit more GHG emissions than is necessary with existing techniques and then having to retrofit those projects before 2045 to meet our net zero goal, the Humboldt Region should use CEQA GHG thresholds that encourage climate smart development starting now and moving forward.

The Planning Commission's change to the CEQA GHG thresholds was not supported by substantial evidence, conflicts with state climate mandates and net zero goal, undermines the County's planning integrity, and violates CEQA, exposing the County and future projects approvals to significant litigation risk. We ask the Board of Supervisors to undo this change and restore the original CEQA GHG thresholds of significance before approving the RCAP.

b. The Board of Supervisors Should Clarify the Definition of Infill Development Used in The RCAP

¹ *California Environmental Quality Act Greenhouse Gas Emissions Thresholds and Guidance: Final Report*, Humboldt County, October 2025 at 24 available at <https://humboldt.legistar.com/View.ashx?M=F&ID=14853144&GUID=E248B4C9-7C5D-4F7C-B5E6-A4FC238C8204>

² Id at 30

³ Id at 30-31.

⁴ Id at 31.



A new definition of infill development was also added to the RCAP just prior to its consideration by the Planning Commission. The vagueness of this definition and the resulting confusion at the Planning Commission hearing result in a need for clarification by the Board of Supervisors in order to ensure that the RCAP includes a land use measure backed by substantial evidence that will reduce carbon emissions from transportation. Instead, we recommend using a version of the regulatory definition of infill found at CEQA Guidelines Section 15332. We ask the County must be totally clear that rural housing subdivisions and commercial development do not qualify as infill under the RCAP, and therefore will not qualify for CEQA streamlining.

II. The Original CEQA GHG Thresholds Of Significance Were Supported By Substantial Evidence as Required for Thresholds of Significance

Cal. Code Regs. tit. 14, § 15064.7(b) requires that thresholds of significance (1) Be supported by substantial evidence; (2) Be adopted through a public review process; and (3) Reflect the level at which the lead agency finds the environmental effect to be significant. Cal. Code Regs. Tit. 14, § 15064.7(c) further clarifies “[w]hen adopting or using thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence.”

Cal. Code Regs. Tit. 14, § 15384(a) defines substantial evidence as “enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached.” However, “[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence.” Cal. Code Regs. Tit. 14, § 15384(a) Furthermore, substantial evidence must be “credible,” “reasonable,” and based on facts, not mere speculation or unsubstantiated opinion. (Guidelines §15384(a), (b).)

Courts have further clarified that substantial evidence must be found in the administrative record and cannot be supplied after the fact. In *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* 40 Cal.4th 412, 442, (2007) the California Supreme Court explained that CEQA requires “adequacy, completeness, and a good-faith effort at full disclosure,” meaning that agencies must rely on evidence that logically supports their conclusions. Similarly, *North Coast Rivers Alliance v. Kawamura* 243 Cal.App.4th 647, 668 (2015) emphasizes that substantial evidence must consist of actual data and analysis, not assertions or assumptions. California courts treat CEQA GHG thresholds with particular scrutiny



because they must align with state climate mandates including SB 32 (Health & Saf. Code § 38566), Gov. Exec. Order B-55-18, and CEQA Guidelines, Appendix G which requires evaluation of consistency with state climate goals. In *Golden Door Properties, LLC v. Cnty. of San Diego*, 50 Cal. App. 5th 467 (2020) the Court of Appeal struck down a GHG methodology because San Diego County (1) failed to provide technical support for its significance approach; (2) relied on unsupported assumptions; and (3) could not show consistency with statewide climate targets. Together, these authorities establish that CEQA decisions, including the adoption of significance thresholds, must be grounded in a robust evidentiary foundation that demonstrates reasoned, fact-based decision-making.

Rincon calculated the GHG thresholds based on other communities across the State of California and the thresholds these communities are setting in their Climate Action Plans.⁵ Rincon also found that adopting higher GHG thresholds would “allow for higher GHG emissions from development than is necessary with existing development techniques and equipment.”⁶ This means Humboldt can use existing development techniques and equipment to meet the thresholds originally proposed by Rincon. Rincon’s analysis and recommended thresholds are supported by substantial evidence. Arguments that Humboldt cannot accomplish these targets are not supported by the analysis conducted by Rincon.

III. Adopting the recommended CEQA GHG Thresholds of Significance Sets Humboldt Up For Success Meeting the State Mandated 2045 Net Zero Goal

AB 1279 (2022) is now a central pillar of California’s climate policy and directly shapes how local agencies, including Humboldt County, must approach climate action planning under CEQA. Codified at Health & Safety Code §§38561.2 and 38561.3, AB 1279 requires the state to achieve carbon neutrality no later than 2045 and to attain and maintain net-negative emissions thereafter, while also mandating steep interim reductions. Because CEQA significance thresholds and Climate Action Plans must be supported by substantial evidence and aligned with statewide GHG reduction mandates, local agencies cannot adopt thresholds or strategies that are inconsistent with the statutory 2045 carbon-neutrality target. Courts have recognized that state climate laws establish the analytical framework within which local CEQA decisions must operate, particularly for GHG mitigation and consistency determinations. Thus, AB 1279 requires Humboldt County to ensure that its selected CEQA GHG thresholds, reduction measures, and planning assumptions are fully aligned with California’s legally binding decarbonization trajectory.

⁵Id at 30-31.

⁶Id at 30.



County staff indicated at the Planning Commission meeting on October 16th that the 50% higher CEQA GHG thresholds would still allow Humboldt to meet the 2030 goal of 40% below 1990 levels. This is supported by Rincon's analysis.⁷ However, these significantly higher thresholds would make it more difficult for Humboldt to meet the 2045 net zero goal, because they would unnecessarily streamline development that emits more GHG emissions than current technologies and development practices allow us to mitigate. That means that these projects, built between 2026 and 2030, would have to be retrofitted after 2030 to be in line with the State's 2045 goal.⁸ This will come at considerable unnecessary expense to developers or the County. It is more cost effective to build projects that use currently available technologies to meet the 2045 goal today rather than retrofit projects in 4 years in order to utilize what Rincon characterized as "existing development techniques and equipment."

IV. The Planning Commission's Decision Was Not Based on Relevant Consideration & Therefore Violates CEQA

A CEQA significance threshold must reflect the point at which an impact becomes environmentally significant — not the point at which regulations become politically or economically inconvenient. Cal. Code Regs. Tit. 14, § 15384(a) specifically states "evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." Instead courts have repeatedly emphasized that thresholds must be grounded in science and substantial evidence. In *Communities for a Better Environment v. California Resources Agency* 103 Cal.App.4th 98, 111–114, (2002) the court struck down standards that would have allowed agencies to "mask or minimize" significant impacts, holding that CEQA significance criteria must meaningfully disclose when harm occurs. Likewise, *Berkeley Keep Jets Over the Bay v. Board of Port Comm'rs*, 91 Cal.App.4th 1344, 1355–1358, (2001) explains that significance determinations must rest on reasoned, evidence-based methodology, not policy-driven attempts to avoid mitigation. Finally, *Lotus v. Department of Transportation*, 223 Cal.App.4th 645, 656, (2014) confirms that economic or political considerations cannot replace CEQA's evidence-based inquiry into environmental effects. These cases make clear that significance thresholds must reflect environmental reality—not political preference. A CEQA GHG threshold must be a scientific tool for measuring environmental harm, not a mechanism for weakening environmental review to support economic development. CEQA does not permit such an approach when setting thresholds of significance.

Several Planning Commissioner comments during their October 16th meeting indicated that they voted to increase the GHG thresholds because they were worried that too low a

⁷Id at 34.

⁸Id at 30-31.



threshold would stymie economic development, not that they believed that the recommended threshold was not supported by substantial evidence. The following are some selected quotes from the Planning Commission deliberation at the October 16th meeting:

"I think that most contractors are already doing as much as they can, you know, afford to do... unless there is an incentive... because if not, how are they going to do it unless they have a grant." [Peggy O'neil 1:40:09- 1:40:41]⁹

"Wealth here is not a condition of whether or not we approve CEQA [Jerome Qiriaz 1:42:46-1:42:49] "But it's certainly a condition of whether or not we can afford to buy a house and conditioning, our meeting our thresholds on the backs of future development, again, comes back to the cost of housing. So that's my concern." [Iver Skavdal 1:42:49-1:43:21]¹⁰

"I don't want to shut off future development any more than it's, you know, any more constraints than it already has. So that's, I'm just trying to find the right balance there. [Iver Skavdal 1:44:14-1:44:20] "You're already looking at costs for 500 to \$1,000 a square foot if you get into commercial. And so if you say, but we want you to do more, the people aren't going to build anything." [Peggy O'Neil 1:44:20-1:44:33]¹¹

These conversations indicate that the Planning Commission was impermissibly considering the potential economic effects of the CEQA GHG thresholds, not whether they were supported by substantial evidence. Remember, Cal. Code Regs. tit. 14, § 15064.7(b) requires that thresholds of significance (1) Be supported by substantial evidence; (2) Be adopted through a public review process; and (3) Reflect the level at which the lead agency finds the environmental effect to be significant. The Planning Commission failed to satisfy all 3 of these requirements in their decision to raise the thresholds of significance.

The first requirement they violated is that the threshold "reflect the level at which the lead agency finds the environmental effect to be significant." Here, the Planning Commission considered the level at which they believed the threshold would allow additional intensive GHG development. None of the criteria allow a lead agency to raise a threshold out of concern that environmental protection may slow economic development as was the case at the Planning Commission meeting. The California Supreme Court has affirmed that CEQA thresholds must be objectively related to environmental significance not economic concerns or other policy choices. *Cal. Bldg. Indus. Ass'n v. Bay Area Air Quality Mgmt. Dist.*, 62 Cal. 4th 369, 382–83 (2015) ("CBIA v. BAAQMD"). In that case, the California Supreme Court explicitly did not permit

⁹ Recording of the October 16, 2025 Humboldt County Planning Commission Meeting available at https://humboldt.granicus.com/player/clip/2123?view_id=5&meta_id=509300&redirect=true

¹⁰ Id.

¹¹ Id.



agencies to substitute policy preferences for evidentiary support. The Planning Commission rationale—concerns that lower thresholds “shut off future development”—is precisely the type of unsupported, conclusory economic assertion that courts routinely reject.

The second requirement they violated was the need to rely on substantial evidence. Even if the County wanted to rely on economic concerns for increasing the thresholds those would also have to be supported by substantial evidence. California courts consistently hold that economic concerns may only be considered when supported by substantial evidence, and cannot substitute for environmental analysis. “Bare or conclusory economic assertions do not constitute substantial evidence.” *Flanders Foundation v. City of Carmel-by-the-Sea*, 202 Cal. App. 4th 603, 615–16 (2012). In general, CEQA determinations cannot rely on speculation or assumptions. *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova*, 40 Cal. 4th 412, 442 (2007). If an agency wants to make a claim that an action is economically infeasible that claim has to be supported by substantial evidence in order to be lawful. *Preservation Action Council v. City of San José*, 141 Cal. App. 4th 1336, 1356–57 (2006) Here, the Planning Commission’s economic analysis (which they relied on to raise the thresholds) was not based on substantial evidence and therefore violates CEQA.

Finally, the Commission violated the requirement to use an adequate public review process because the CEQA threshold they selected (50% above what was recommended by Rincon) was not analyzed in the RCAP or in the EIR. That meant that the public was not adequately consulted and there was not an adequate public review process of these higher thresholds.

V. The Planning Commission's Decision Will Have A Substantial Environmental Impact That Was Not Considered in the EIR and Therefore Violates CEQA.

At the Board of Supervisors meeting on December 16th, not only will the Board vote to approve the RCAP be, but it will also vote to certify the Environmental Impact Report (EIR) for the RCAP. That EIR considered the environmental impact of a “project” that included the RCAP which relies on the thresholds of significance recommended by the consultants. The RCAP relies on those thresholds of significance because implementation of the RCAP includes streamlining future projects that do not meet the thresholds of significance identified. There were opportunities in the EIR for the RCAP to consider alternatives to the project and one of those alternatives could have been to utilize 50% higher CEQA GHG thresholds. However, the RCAP EIR did not analyze this alternative because it was not proposed until extremely late in the development of the RCAP. That means that Humboldt County has not meaningfully analyzed the GHG impacts of allowing the RCAP to streamline additional GHG intensive



development under the higher thresholds adopted by the Planning Commission. As discussed above, this was done without adequate justification.

Lead agencies cannot select or revise thresholds of significance in a way that reduces environmental protection without justification. Courts have repeatedly held that agencies must demonstrate, with substantial evidence, that a chosen threshold meaningfully informs whether a project may cause a significant impact. *Communities for a Better Environment v. California Resources Agency*, 103 Cal.App.4th 98, 114-118 (2002) invalidated CEQA Guideline amendments that would have allowed agencies to mask significant impacts, emphasizing that significance determinations cannot be weakened without analysis. Likewise, *Berkeley Keep Jets Over the Bay v. Board of Port Comm'rs*, 91 Cal.App.4th 1344, 1355-1358 (2001) underscores that agencies must base significance determinations on reasoned, evidence-based methodology, not policy preferences. And in the GHG context, *Cleveland National Forest Foundation v. SANDAG*, 3 Cal.5th 497, (2017) confirms that agencies must meaningfully evaluate climate-related impacts using evidence-based thresholds.

Here, Humboldt has not meaningfully evaluated the climate related impacts of increasing the thresholds by 50% above the level recommended by Rincon and analyzed in the EIR. The County put forward no analysis that increasing the GHG thresholds by 50% would not have a significant environmental impact. Nor did the County put forward any analysis that meeting the thresholds proposed by Rincon was infeasible. Instead, the County's presentation and discussion at the Planning Commission indicated that this change was proposed primarily to ease GHG intensive development. Adopting these higher thresholds of significance for this reason, without any evidence supporting it, would contravene CEQA caselaw as well as CEQA's core requirement of informed, evidence-based decision-making.

VI. The Planning Commission's Decision Is Counterproductive to the Purpose of the RCAP

The RCAP is intended to serve as Humboldt County's roadmap for achieving meaningful and measurable greenhouse-gas reductions consistent with state law, including AB 32, SB 32, and AB 1279's requirement that California reach carbon neutrality by 2045. Raising the threshold without evidence effectively weakens the County's primary tool for identifying and mitigating significant emissions, allowing larger sources of pollution to escape scrutiny. Not only does this undermine CEQA's requirement that thresholds be scientifically grounded and protective, but it also directly frustrates the RCAP's core objective: to reduce, not expand, the County's GHG footprint. An arbitrary increase in the threshold moves the County further from its climate commitments and jeopardizes the credibility and effectiveness of the entire planning effort.



VII. Adopting the Thresholds Recommended by the Planning Commission Would Create Serious Legal & Practical Risks

Adopting a threshold without substantial evidence would constitute an abuse of discretion under Pub. Res. Code § 21168.5. ("Abuse of discretion is established if the agency has not proceeded in a manner required by law or if the determination or decision is not supported by substantial evidence." See also *CBIA v. BAAQMD*, 62 Cal. 4th at 382–83 & *Golden Door*, 50 Cal. App. 5th at 517–20.)

This could lead to the RCAP itself being challenged in court which would lead to years of litigation that doesn't benefit anyone. In addition, it could lead to individual projects relying on the, now faulty analysis in the RCAP being challenged in court which would create uncertainty for developers and the County. If the County is trying to provide a benefit to developers, adopting a legally defective threshold of significance does not do so.

VIII. The Definition of Infill and the Application of Infill-Related Measures Must Be Clarified

A new definition of infill development was included in the RCAP just prior to its consideration by the Planning Commission. The new definition was a lightly modified quote from an informational webpage maintained by the Governor's Office of Land Use and Climate Innovation (LCI): "building within unused and underutilized lands within existing development patterns, typically but not exclusively in urban areas" (<https://lci.ca.gov/planning/land-use/infill-development/>). While we agree with the need for a specific definition of infill, this definition is too vague to serve the purpose, and would potentially allow high-emission, high-VMT development to qualify as "infill." Instead, we recommend using a version of the regulatory definition of infill found at CEQA Guidelines Section 15332. After replacing "city limits" with "urban area" to harmonize with the rest of the RCAP and make it more applicable to the Humboldt context, the definition would read:

- a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.
- (b) The proposed development occurs within an urban area on a project site of no more than five acres substantially surrounded by urban uses.
- (c) The project site has no value as habitat for endangered, rare or threatened species.
- (d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.
- (e) The site can be adequately served by all required utilities and public services.



Also at the Planning Commission hearing, staff proposed and the Commission recommended a text amendment clarifying that RCAP Measure T-3 (the infill measure) applies countywide, not just in urban areas. This is a crucial change which we strongly support, but it must be interpreted correctly. Applying Measure T-3 countywide means that both urban and rural housing and commercial development must be assessed for consistency with the measure, and—since rural development is by definition not infill development—rural projects will be found inconsistent with the RCAP. That will ensure that rural projects will have to analyze and mitigate their GHG impacts, just as they do today, but under the newly adopted GHG significance thresholds. (If the measure were labeled as applicable only to urban areas, it could ironically allow rural projects to simply claim the measure doesn't apply and thereby avoid analyzing GHG impacts entirely.)

However, at the Planning Commission hearing, there was significant confusion over the application of Measure T-3, with some participants expressing the idea that applying the measure countywide would mean that rural development could be called "infill." That is not true. The County must be totally clear that rural housing and commercial development does not qualify as infill under the RCAP, and therefore will not qualify for CEQA streamlining.

We ask the Board of Supervisors to adopt the more specific and rigorous definition of infill above, following the well-established definition in CEQA Guidelines, and clarify that development that does not qualify as infill under this definition will not be considered consistent with the RCAP or eligible for CEQA streamlining.

Thank you for your consideration of our comments.

Sincerely,

Matt Simmons, Climate Attorney
Environmental Protection Information Center
matt@wildcalifornia.org

Colin Fiske, Executive Director
Coalition for Responsible Transportation Priorities
colin@transportationpriorities.org



Outlook

comment regarding HRCAP

From Martha Walden <mawalden53@yahoo.com>

Date Wed 12/10/2025 8:06 PM

To Madrone, Steve <smadrone@co.humboldt.ca.us>; Bohn, Rex <RBohn@co.humboldt.ca.us>; Bushnell, Michelle <mbushnell@co.humboldt.ca.us>; Wilson, Mike <Mike.Wilson@co.humboldt.ca.us>; Arroyo, Natalie <narroyo@co.humboldt.ca.us>; COB <COB@co.humboldt.ca.us>

 1 attachment (38 KB)

350 RCAP comment to BOS in Word.doc;

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Please see attached comment letter regarding the Humboldt Regional Climate Action Plan.

Thank you.

Martha Walden



12/10/25

Dear Humboldt County Supervisors,

350 Humboldt supports the passage of the Humboldt Regional Climate Action Plan. However, it's imperative to restore the original CEQA Greenhouse Gas Threshold of Significance of 50%. The Planning Commission raised this threshold, ignoring the recommendation of Rincon Consultants, the authors of the RCAP. Considering what a crucial piece of the plan the threshold is, there would need to be solid grounds for ignoring the professional recommendation. Unfortunately, the majority vote, which was only three Commissioners that night, cited concern about potential cost impacts instead of an issue relevant to the relationship between emissions and climate impacts.

The status quo right now is that all development undergoes GHG evaluation. The purpose of a climate action plan isn't to enable developments to avoid that evaluation unless it's very clear that doing so will not impact the climate. Potential costs are an issue to be handled separately as always.

The HRCAP is a work of eight years that struggles to deliver significant emissions reductions in the time frame we have to be compliant with state law. Please do not accept any changes at this point that would weaken the plan's ability to deliver those reductions. It's not just a matter of state law but of curbing the most disastrous effects of the changing climate.

350 Humboldt steering committee

Martha Walden

Nancy Ihara

Dan Chandler

Comment for Board of Supervisors regarding the Climate Action Plan

From Catherine Gurin <cegurin@gmail.com>

Date Thu 12/11/2025 1:18 PM

To COB <COB@co.humboldt.ca.us>

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Hello,

I am writing to request that the Humboldt County Board of Supervisors approve the Regional Climate Action Plan after making a few key changes, including:

- Adopting greenhouse gas thresholds at the original levels recommended by the consultant and rejecting the Planning Commission's attempt to weaken this key standard for projects that aren't compliant with the plan.
- Ensuring that only low-emission infill development projects will be considered compliant with the plan, so that high-emission rural developments aren't exempted from analyzing and mitigating their climate impacts.
- Adopting and implementing the plan without delay and without weakening it.

Thank you,

Katy Gurin



--

Katy Gurin
she/her/hers



Outlook

Comment - Humboldt Regional Climate Action Plan - Biofuelwatch

From Gary Hughes <garyhughes.bfw@gmail.com>

Date Thu 12/11/2025 8:35 AM

To COB <COB@co.humboldt.ca.us>; Planning Clerk <planningclerk@co.humboldt.ca.us>

Cc Wilson, Mike <Mike.Wilson@co.humboldt.ca.us>; Madrone, Steve <smadrone@co.humboldt.ca.us>; Bohn, Rex <RBohn@co.humboldt.ca.us>; Bushnell, Michelle <mbushnell@co.humboldt.ca.us>; Arroyo, Natalie <narroyo@co.humboldt.ca.us>

 1 attachment (465 KB)

HumboldtRCAP_Biofuelwatch_11dec2025.pdf;

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

To responsible officials: Please receive the attached document as a written comment from the organization Biofuelwatch to the Humboldt County Board of Supervisors on the Final Environmental Impact Report for the Humboldt Regional Climate Action Plan, which will be before the Supervisors on Tuesday Dec 16.

Thank you. Cordially, Gary

--

Gary Graham Hughes, M.Sc.

Coordinador del Programa de las Américas / Co-Director

Co-Director / Americas Program Coordinator - [Biofuelwatch](#)

[Bioenergy in California](#)



Email: garyhughes.bfw@gmail.com

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December 11, 2025

Humboldt County Board of Supervisors
Supervisor Mike Wilson, Chair
Tracy Damico, Clerk of the Board
825 5th Street, Eureka CA, 95501

*Submitted electronically via email to cob@co.humboldt.ca.us and
planningclerk@co.humboldt.ca.us*

Re: Humboldt Regional Climate Action Plan

Esteemed Supervisors, Chair Wilson:

Our organization Biofuelwatch appreciates the opportunity to submit this letter to the Humboldt County (County) Board of Supervisors (BoS) as comment on the Final Environmental Impact Report (FEIR) for the Humboldt Regional Climate Action Plan¹ (HRCAP). Biofuelwatch² is an international organization that works to increase public understanding and civic engagement on the land-use implications of climate policy. We have a particular focus on the environmental harms and social inequities of large-scale industrial bioenergy projects, and we work extensively on addressing the negative ecological and social outcomes of policy and actions that are justified as being beneficial to the global climate, yet carry with them risks and threats to public health, economic stability and natural resources.

We have previously provided extensive comment on various iterations of the HRCAP. In particular we have repeatedly highlighted our concerns regarding the proposed mechanism to burn the liquid biofuel 'renewable diesel' product in place of burning petroleum-based diesel as a supposed emissions reduction pathway. This pathway for addressing the climate impacts of petroleum-based transportation fuels by burning a high emissions liquid biofuel product in their place is based on false premises and has clear potential to make the global climate and biodiversity crisis worse, not better. Our organization is adamant that endorsing requirements to consume more deforestation driving liquid biofuels in Humboldt County as a local climate 'solution,' regardless of whether or not those requirements are enforceable, will only further expand the reliance on a fuel product that is demonstrated to result in more overall emissions

¹ <https://humboldt.gov.org/2464/Humboldt-Regional-Climate-Action-Plan>

² <http://www.biofuelwatch.org.uk/>

than does petroleum-based diesel³. As we have said publicly many times, ‘renewable diesel is not renewable’⁴.

The ‘diesel dilemma’ lies at the heart of the addiction of Humboldt County businesses and residents to outside energy inputs that are highly polluting and that are products directly associated with the primary cause of global climate change – fossil fuels. To ignore evidence about known harms and to pivot blindly to the uptake as a supposed local solution of a substitute fuel product that is making the overall situation worse is simply irresponsible. The legacy of global environmental awareness in Humboldt County is far too rich and varied to allow such an error to occur.

We encourage the BoS to remove reliance on ‘renewable diesel’ from the HRCAP.

As reference and as background on our position regarding the climate dead end of so-called ‘renewable diesel’ I have pasted a section from one of our previous comment letters on the HRCAP as an addendum (1. *Biofuel Illusions Bioenergy Delusions*) after the main body of this letter.

The other bioenergy **false solution** that is elevated in the HRCAP that merits a mention, even if it is just in passing, is that of securing hydrogen from woody biomass (i.e. biomass-to-hydrogen).

Our organization Biofuelwatch has extensive experience around the world in monitoring biomass-to-hydrogen schemes, none of which have ever proven to be commercially viable, while all of them have proven to be dirty and polluting.

There is no better way to waste energy than to utilize woody biomass to secure hydrogen⁵.

Beyond avoiding the trap of pursuing the highly polluting gasification technologies required for attempting to acquire hydrogen from woody biomass we strongly recommend against the HRCAP continuing down the wrong road of reliance on hydrogen altogether, as it is still most common to acquire hydrogen from the steam reformation of methane (i.e. fossil gas). Such hydrogen should not be characterized as low carbon, and it is controversial when authorities try to do so.

Considering the governance irregularities in the manner by which the massive federal subsidies for the build out of hydrogen infrastructure in the USA have recently been eliminated, there are good reasons to step back and reassess prioritizing hydrogen as a supposed energy option for climate mitigation strategies. It is already evident that hydrogen will not prove to be a viable energy solution, as reliance on hydrogen perpetuates the fossil fuel industry.

The remainder of our comments are largely focused on discussing a few somewhat niche themes around ‘carbon sequestration’ that exemplify the problems that we identified in the HRCAP. We

³ https://www.transportenvironment.org/articles/scientist_letter_biofuels

⁴ <https://www.biofuelwatch.org.uk/2022/renewable-diesel-is-not-renewable/>

⁵ <https://www.biofuelwatch.org.uk/2018/dead-end-road/>

offer some bullet point highlights that specify scientific, technical and political short comings with a number of the possible pathways included in the HRCAP to increase carbon sequestration in the region.

Recovering and stabilizing carbon stocks is of itself a worthy goal, and an imperative – but the methods for getting there must not cause more harm than good.

- Carbon capture and sequestration (CCS)⁶ is a fossil fuel industry technology. On different occasions in the HRCAP the development of CCS technology is floated as a possibility for the County to explore. Nevertheless, fundamental to this type of technology is the infrastructure required for the transport of carbon dioxide (CO₂), namely CO₂ pipelines. The HRCAP proposes exploring carbon capture and sequestration technologies as an eventual emissions reduction strategy in the region, but the plan does not have the foresight to mention that CO₂ pipeline development, construction, operation and accident preparedness⁷ would be inherent in any such technology. Such an oversight hints that the preparers of the HRCAP are either beholden to the fossil fuel industry, and trying to hide from public view the harmful aspects of these CCS technologies, or they are simply throwing ideas at the wall in hopes that something will stick.
- All of these same concerns are associated with the mention of Direct Air Capture (DAC)⁸ as a possible carbon sequestration option to be explored in the region. Evidence shows that DAC is an energy and materials loser, hence the ongoing underperformance and failures of DAC projects globally, which are also largely directly operated by fossil fuel industry stakeholders. Future development of Direct Air Capture technology was long a leading talking point in fossil fuel industry climate disinformation campaigns. Now the promotion of this energy intensive technology permeates climate planning, even in a local jurisdiction that is addicted to fossil fuels, but in the real world is host to very little fossil fuel infrastructure, and none that could currently support any DAC project development. (See Addendum 2. *Unrealistic Energy and Materials Requirements of Direct Air Capture*).
- Another very problematic speculative technology that is offered as worth future exploration is what the HRCAP refers to as ‘ocean carbon capture.’ This is not a common term, though by inference one assumes that the HRCAP is be making allusion to what is known in policy circles as Marine Carbon Dioxide Removal (mCDR)⁹. **This is essentially marine geoengineering¹⁰.** Geoengineering is actually subject to a current *de-facto* moratorium under the Convention on Biological Diversity, to which California is an official ‘observer’ party. **The elevation by the County of dangerous speculative geoengineering technologies as worth further exploration in regional climate planning is newsworthy.** It is our assessment that it is likely that the County is 1) uninformed about what they are

⁶ <https://www.geoengineeringmonitor.org/technologies/carbon-capture-and-storage>

⁷ https://www.huffpost.com/entry/gassing-satartia-mississippi-co2-pipeline_n_60ddea9fe4b0ddef8b0ddc8f

⁸ <https://www.geoengineeringmonitor.org/technologies/direct-air-capture>

⁹ <https://www.sciencedaily.com/releases/2025/11/251120002832.htm>

¹⁰ <https://www.ciel.org/reports/marine-geoengineering-global-ocean-threats/>

proposing and 2) probably lucky that no one is paying any attention, because geoengineering is an extremely controversial topic¹¹. It is shocking that **marine geoengineering** emerges here in the HRCAP in such a casual manner. (See Addendums 3. *The HRCAP Promotes Exploring Technologies that Represent Threats to Our Oceans* and 4. *Marine Geoengineering is of International Concern*)

- We are very concerned at the lack of frank and transparent discussion of the realities of real world causes of climate change in Humboldt County and associated jurisdictions providing the fossil energy resources on which Humboldt County is totally reliant. We have mentioned a few of our concerns regarding the failure of the HRCAP to provide a factual and real-world assessment of the realities and the role of transportation fuels in the County.
- What is also disturbing is the lack of a factual and reality-based assessment of land sector carbon dynamics, namely the failure to identify the legacy of deforestation in the County as having transformed the forested landscape. (See Addendum 5. *Landscape Amnesia and Ignoring the Legacy of Deforestation*).
- The best available land carbon science is clear that carbon sequestration trends and potential in ecosystems like forests can only be understood in the context of past land use change. Yet, while much is made in the HRCAP of the potential of carbon sequestration in the land sector, the plan makes no mention of the history of land use change in the region, transformative as it has been over the years, ignoring significant resource extraction dynamics that have had a legacy impact. The HRCAP is disinterested in providing a data driven accounting of the economic activity that has depleted many natural resources in the region. In never mentioning the liquidation of the ancient redwood forests in the region, nor acknowledging the climate impacts of this deforestation event, the HRCAP discussion of carbon sequestration remains detached from reality. Nor are the protected areas (parks, etc.) mentioned or acknowledged, despite their obvious value for climate and biodiversity protection. The HRCAP is clearly very deficient when it comes to the discussion of the land sector climate mitigation options available in the County, and is an inadequate road map for exploring whether or not or how carbon sequestration can be pursued as a climate mitigation mechanism.
- Along those lines the HRCAP makes allusions to different types of land owners in the region but fails to do any in depth analysis of land tenure in the region, or how such dynamics can impact climate mitigation. Land tenure can indicate land management trends and other information that would be important for fact-based climate planning. But the HRCAP does not endeavor to address these matters of who owns the land and what it being done with it, or how those decisions impact climate planning in the region.

¹¹ <https://handsoffmotherearth.org/resources/home-alliance-statement-on-marine-geoengineering-experiments/>

Conclusion: The HRCAP Is Insufficient for Future Streamlining of CEQA Permitting

For our organization it is extremely disturbing to think that the purpose of doing an Environmental Impact Report under the California Environmental Quality Act (CEQA) for the HRCAP is intended to streamline further CEQA permitting processes in the future. As it stands right now the HRCAP has numerous exceptionally faulty premises, not to mention having suffered the recent intervention of the Planning Commission to weaken the GHG Thresholds elements of the HRCAP. A weak climate plan was made even weaker, but the County seems intent to just move forward, sailing a damaged ship further into the maelstrom, to hell with the consequences. Despite public pressure to approve a plan, any climate plan, there is clear evidence that the HRCAP remains far from being a viable roadmap for reducing emissions in the region. This plan needs substantial revision before moving forward with the approval of the FEIR.

Thank you for your attention to these comments.



Gary Graham Hughes / Americas Program Coordinator / Biofuelwatch

Email: garyhughes.bfw@gmail.com / [REDACTED]

ADDENDUMS:

1. Biofuel Illusions Bioenergy Delusions

The reliance on 'renewable diesel' as a cornerstone to securing emissions reductions in the transport sector is predictable -- and dangerous for global forests and frontline communities. Despite the mountains of evidence that demonstrate that producing and burning crop-based liquid biofuels results in more greenhouse gas emissions than petroleum-based diesel, California decision makers continue to respond to the demands of Big Ag and Big Oil by elevating 'renewable diesel' as a climate solution.

There are few energy products that are more controversial in California right now than is 'renewable diesel.' Anyone who is watching the current deliberations around proposed amendments for the Low Carbon Fuel Standard knows full well that the science exposing the flawed carbon accounting of 'renewable diesel' continues to accumulate.

The HRCAP tries to take an easy way out, hoping that substituting petroleum-based diesel with a high emissions high deforestation risk liquid biofuel will somehow magically make the diesel fuel climate challenge just go away -- but nothing could be further from the truth. Reliance on 'renewable diesel' will only undermine the integrity of the HRCAP in the long run, because the house of cards justifying soy-based liquid biofuels as a climate solution is teetering and will not for long stand the winds of climate science.

Not only that, there is damning evidence that the growth in the reliance on making fuel from food is inequitable and unjust, increasing food insecurity for some of the most vulnerable populations on the planet.

ON A GLOBAL LEVEL, IN 2022, CROPS USED FOR BIOFUEL PRODUCTION COULD HAVE MET THE BASIC MINIMUM ENERGY REQUIREMENT OF 1.6 BILLION PEOPLE IF THEY HAD BEEN USED FOR HUMAN CONSUMPTION.

A recent report from Oxfam titled Biofuel Blunders¹² provides analysis of energy policy in the European Union that offers numerous insights for the global reality of increased production and use of liquid biofuels like 'renewable diesel' in California.

The biofuel industry has an impact on food security in many ways: increasing food prices and food price volatility, reducing the availability of food and resources for food production; using disproportional power in the food system over the agency of smallholder farmers and communities; and making food systems less sustainable.

Unfortunately, despite the rural agriculture traditions in Humboldt County, the well documented impacts on food systems from production and use of crop-based liquid biofuels (i.e. making fuel from food) have not been taken into account. The reliance on 'renewable diesel' in the HRCAP must be reconsidered with the context of these factors, and therefore abandoned.

2. Unrealistic Energy and Materials Requirements of Direct Air Capture

We also want to flag the dangerous assumptions about the potential for "direct air capture" (DAC) to be an effective tool for responding to climate change at all, much less an effective tool for responding to climate change in an equitable manner. It is somewhat measured that the HRCAP proposes doing feasibility studies of speculative carbon capture technologies, but the reality is that Humboldt County has little idea of what they are talking about, that Humboldt County is not

¹² <https://oxfamlibrary.openrepository.com/bitstream/handle/10546/621622/bp-biofuel-blunders-110924-en.pdf>

a fossil fuel stakeholder, and that these types of technologies are long known as distractions and central to fossil fuel industry disinformation campaigns.

In short, in our organization's study of the public and policy discourse on these matters, we believe it is incumbent upon decision makers to look hard at the real-world energy and materials requirements of any DAC program of a scale to actually have an impact on the global climate. It is our assessment that in floating the idea of 'direct air carbon capture' the enormity of these requirements is not being taken adequately into consideration. To fail to address these requirements is to fail to address the biodiversity, land use, public health and indeed public safety considerations of these as of yet unproven technologies.

This issue of energy and material requirements of DAC cannot be understated. Even those studies that could be considered relatively positive about DAC warn of the risks of assuming that DAC could be implemented at scale, but then to find that such objectives are technically unattainable (Realmondo et al 2019)¹³. In response to that article a more sober analysis of energy and materials requirements resulted in the conclusion that DAC, even if it were conceivable to pursue at some significant scale, would be "a significant distraction with negligible contributions to mitigating climate change" (Chatterjee and Huang 2020)¹⁴. The HRCAP could save everyone a tremendous amount of time and energy by abandoning the carbon capture unicorns considered in the plan.

3. The HRCAP Promotes Exploring Technologies that Represent Threats to Our Oceans

Our organization is extremely concerned by the HRCAP proposing to explore the feasibility of advancing dangerous marine geoengineering technologies.

Increasingly, our oceans are at threat not only from the impacts of over exploitation and the climate crisis, but also from misguided attempts to manipulate earth systems with the aim of countering some of the symptoms of climate change. The oceans' vastness, vulnerability and comparatively pristine nature are still poorly understood, but they sustain life on earth and are our greatest ally in the fight against climate change: to misuse them in this way presents incalculable uncertainty and risk, and the effects of marine geoengineering on them are unpredictable¹⁵.

It is also important to note the potential for extreme social, cultural and economic impacts, especially on coastal communities that depend on healthy oceans for their livelihoods. Coastal and indigenous communities could face unintended consequences from disruptions resulting from marine geoengineering experiments and project implementation. Nevertheless, Indigenous Peoples' territories continue to be targeted by marine geoengineering researchers. The HRCAP elevation of 'ocean carbon capture' as a technology worth further consideration fails to adequately address these issues from these angles.

¹³ <https://www.nature.com/articles/s41467-019-10842-5>

¹⁴ <https://www.nature.com/articles/s41467-020-17203-7>

¹⁵ <https://handsoffmotherearth.org/resources/home-alliance-statement-on-marine-geoengineering-experiments/>

4. Marine Geoengineering is of International Concern

Biofuelwatch works closely with the Center for International Environmental Law¹⁶ (CIEL) as partners in the Hands Off Mother Earth Alliance (HOME). With HOME we have been active at proceedings of the Intergovernmental Panel on Climate Change (IPCC), before the Convention on Biological Diversity (CBD), and during civil society engagement processes under the United Nations Framework Convention on Climate Change (UNFCCC), amongst other spaces.

Here is what our partners at CIEL have to offer as words of caution regarding risky and unproven marine geoengineering technologies¹⁷:

1. **Marine geoengineering will not eliminate the causes of the climate crisis or ocean acidification.** These technologies do nothing to reduce or mitigate greenhouse gas emissions, which are the major drivers behind climate change.
2. **No marine carbon dioxide removal techniques have been proven effective** in removing and storing CO₂ in the long term, and some could undermine the ocean's ability to store carbon.
3. **Geoengineering creates a moral hazard**, which is when companies and people feel safe to continue harmful actions (like burning fossil fuels) because they think someone or something else will clean up the consequences sometime in the future.
4. **Experiments involving ocean alkalinity, iron fertilization, and artificial upwelling can lead to ocean acidification.** A more acidic ocean is harmful because it weakens the shells and skeletons of corals, shellfish, and plankton, which are essential to marine food chains and for overall ocean health.
5. **Geoengineering has been restricted by a de facto moratorium**, or a permanent legal pause, under the Convention on Biological Diversity since 2010.
6. **Marine geoengineering, like all geoengineering, risks violating the rights of people everywhere**, including the right to health, to food, and to clean water.
7. **If deployed, these technologies would need to be carried out at a massive international scale, which has never been done before.** For example, to capture 0.2% of emissions with seaweed would require the equivalent of growing a 100-meter belt around 63% of the world's coastlines.
8. **We won't know the true impacts of marine geoengineering until it is deployed at a planetary scale**, at which point we will be locked into potentially irreversible effects, turning our planet into a lab experiment.
9. **Marine geoengineering will have transboundary effects.** This means that **everyone will feel its impacts** regardless of how close they are to a coast.
10. **We cannot build our climate solutions on speculative and risky technologies.** The only reliable path is a full, fast, fair, funded phase out of fossil fuels.

¹⁶ <https://www.ciel.org/>

¹⁷ http://act.ciel.org/site/MessageViewer?em_id=10025

5. Landscape Amnesia and Ignoring the Legacy of Deforestation

Considering the extensively documented industrial forestry operations that have occurred over the last 150+ years in Humboldt County, offering incontrovertible evidence of ancient forest liquidation, it strikes our organization as rather myopic for the HRCAP to gloss over this factual reality. We found it noteworthy that the HRCAP, despite recognizing deforestation as one of the primary causes of climate change, completely ignores the climate harms associated not only with the past logging of irreplaceable ancient forest, but with ongoing logging that prevents the recovery of one of our best bets for stabilizing the local and global climate: our forest ecosystems.

The redwood temperate rainforest ecosystem is potentially one of the most carbon dense forest ecosystems on the planet. Yet the HRCAP makes no mention what so ever of the importance of the redwoods in these terms, nor even a passing reference to the science that describes the legacy climate impacts of the logging of the ancient redwoods. Logging is mentioned several times as an important economic factor in the history of the county, but never once is logging associated with climate harms. This is an egregious demonstration of climate denialism. Addressing the history of ancient forest liquidation in Humboldt County will also put better context on the ongoing forest degradation associated with the contemporary aggressive industrial management of hundreds of thousands of acres of private land in the county.

We find it astounding, though entirely predictable, that the HRCAP would simply gloss over the climate harms arising from industrial silviculture activities, both legacy and contemporary, and then falls back on the latest 'natural and working lands' narrative that has been promoted by the California Air Resources Board and the California Natural Resources Agency to facilitate the perpetuation of business as usual in the California land sector.

We strongly recommend that the HRCAP expand their baseline emissions inventory of the land sector to include a science-based assessment of the greenhouse gas emissions that are attributable to industrial forestry practices in the County. Without this basic baseline of information, the entire 'natural and working lands' section of the HRCAP becomes nothing more than fantastical thinking. This idea that somehow the land sector is going to magically scrub the atmosphere of carbon dioxide is popular, and it offers solace to people who are genuinely concerned about climate change, but it has little to do with the geophysical reality of the world in which we are living.