

Chapter 5

Other CEQA Considerations

Chapter 5. Other CEQA Considerations

This chapter of the EIR addresses the other content requirements the State CEQA Guidelines not included in the other chapters. It discusses the effects of implementing the proposed General Plan Update on each of the following topic areas:

- Significant irreversible changes;
- Cumulative impacts;
- Growth-inducing impacts;
- Long-term versus short-term costs and benefits;
- Mandatory Findings of Significance:
 - Potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels;
 - Potential to threaten to eliminate a plant or animal community;
 - Potential to reduce the number or restrict the range of a rare or endangered plant or animal; and
 - Potential to eliminate important examples of the major periods of California history or prehistory.

Finally, Chapter 5 finishes by identifying the organizations and persons consulted in preparation of the EIR, and the preparers of the EIR.

5.1 Significant Irreversible Changes

CEQA Guidelines §15126.2-Consideration and Discussion of Significant Environmental Impacts, requires EIRs to describe any significant irreversible environmental changes that would result from the proposed action (implementation of the proposed General Plan Update). The CEQA Guidelines describe the scope of this analysis as follows:

15126.2(c) Significant Irreversible Environmental Changes Which Would be Caused by the Proposed Project Should it be Implemented. Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Implementation of the proposed General Plan Update would result in long-term irretrievable commitments of nonrenewable resources associated with the construction of new housing units, non-residential structures, streets, and other infrastructure. The commitment of natural resources would include lumber and forest products, sand and gravel, asphalt, petrochemicals, and other construction materials. The resulting consumption of fossil fuels would incrementally reduce existing supplies of fuel oil, natural gas, and gasoline.

An incremental increase in energy demand would also take place during construction and post-construction activities, including lighting, plumbing, and heating of commercial, industrial, school, and residential buildings.

The development and further urbanization within the plan area would effectively result in irreversible environmental changes; once an area is developed into a built environment, the likelihood of 'reversing' development back to an undeveloped state is highly improbable because the investment of resources and infrastructure for new development is an asset that tends to be protected over time. Therefore, such changes are considered irreversible.

5.2 Cumulative Impacts

CEQA requires EIRs discuss cumulative impacts attributable to the proposed plan. CEQA Guidelines Section 15130 [excerpts]:

(a) An EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable, as defined in Section 15065(a)(3)[*]. Where a lead agency is examining a project with an incremental effect that is not "cumulatively considerable," a lead agency need not consider that effect significant, but shall briefly describe its basis for concluding that the incremental effect is not cumulatively considerable. (...)

[*§15065(a)(3), Mandatory Findings of Significance, CEQA Guidelines state that a plan may have environmental impacts that are "individually limited but cumulatively considerable." "Cumulatively considerable" means that the incremental effects of an individual plan, such as the proposed General Plan Update, are significant when viewed in connection with the effects of other past, current, and probably future projects.]

(b) The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness and should focus on the cumulative impact to which the identified other projects contribute, rather than the attributes of other projects which do not contribute to the cumulative impact. The following elements are necessary to an adequate discussion of significant cumulative impacts:

(1) Either:

- A. A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or
- B. A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency....

The geographic scope of the area affected by the cumulative effect is the entire Humboldt County. This geographic limitation for the cumulative assessment is reasonable because of the relative isolation of the county and separation from adjacent counties by large tracts of resource lands as shown on the GPU land use maps.

This EIR discusses significant cumulative impacts of the proposed General Plan Update based on projections of the Department of Finance. Table 5-1, Projected Housing Units by Jurisdiction

which shows projections for each city along with the proposed General Plan Update over the next 20 years.

As described in Chapter 2 of this EIR (Project Description) the County is not expected to reach the maximum buildout allowed under the General Plan Update during this time period, the figures in the below table provide a reasonable basis to discuss the cumulative impacts of the Plan. The projections assume growth will occur in each jurisdiction in the future on a proportional basis because all cities and the County are required by state law to ensure sufficient development potential to accommodate their fair share of the region's projected housing needs. These requirements are explained in Chapter 8 of the GPU, the Housing Element.

Table 5-1: Projected Housing Units by Jurisdiction

Jurisdiction	Housing Units		
	2010 ¹	2040 ²	Change
City of Arcata	7,722	8,007	285
City of Blue Lake	572	593	21
City of Eureka	11,891	12,329	438
City of Ferndale	717	743	26
City of Fortuna	4,991	5,175	184
City of Rio Dell	1,442	1,495	53
City of Trinidad	252	261	9
<i>Subtotal Incorporated</i>	27,587	28,604	1,017
Unincorporated Area	33,972	35,693	1,721
Total	61,559	64,297	2,738

Sources: ¹State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State, 2010-2011, with 2010 Benchmark*. Sacramento, California, May 2011; ²State of California, Department of Finance, *Population Projections for California and Its Counties 2000-2050*, Sacramento, California, July 2014; Humboldt County Planning and Building Department, 2017

Considering the projected growth that is expected to occur countywide, the following paragraphs discuss the proposed General Plan Update's cumulative impacts in terms of the standards of significance in Chapter 3 of this EIR.

Impact 3.1.3 Land Use Population and Housing

Impact 3.1.3.1 Divide an Established Community

Growth is expected to occur in each jurisdiction in the county under their general plans, which is expected to expand communities rather than divide them. The General Plan Update seeks to enhance transportation options within existing communities, improving pedestrian and bicycle facilities and connectivity. Therefore, the potential for the General Plan Update to divide communities would be less than significant on a cumulative basis.

Impact 3.1.3.2: Conflict with Other Applicable Land Use Plans, and
Impact 3.1.3.3: Habitat Conservation Plans

Section 3.1, Land Use Housing and Population, did not identify any inconsistencies between the proposed General Plan Update and other relevant city plans, programs, regulations, and habitat conservation plans that would result in adverse environmental effects. It is possible cities may adopt development standards that are inconsistent with standards in the General Plan Update. For example cities may have less protective standards than those in Chapter 10, the Conservation and Open Space Element. However, the County has no jurisdiction over cities, and it is beyond the scope of the General Plan Update to coordinate regional adoption of its policies and standards. Therefore, the General Plan Update would result in less than significant cumulative impacts in terms of this standard of significance.

Impact 3.1.3.4. Induce Population Growth

The General Plan Update and the general plans for the cities in the County do not encourage development beyond what is projected by the state, and required to be planned for in the housing elements of each jurisdiction's general plan. Distribution of the region's fair share housing allocations associated with 5-year updates of each jurisdiction's Housing Element has historically been done on a pro-rata share basis with adjustments to focus future growth into the region's more urbanized areas, and this method will continue to be used. In addition, the Humboldt County growth rate is consistently below that of the State of California, a trend that is not expected to change. The proposed General Plan Update's cumulative impact on population growth is considered less than significant for these reasons.

Impact 3.1.3.5 Displace Existing Housing or People

Development of new housing under the General Plan Update is expected to occur at a rate which will accommodate future population growth, so there is not expected to be significant displacement of existing housing or people. All cities and the County are required by state law to ensure there exists a land inventory with sufficient development potential to accommodate their fair share of the region's housing needs throughout the planning period. The proposed General Plan Update's cumulative impact on displacement of housing and people is considered less than significant for these reasons.

Impact 3.2.3 Agricultural Resources

Impact 3.2.3.1: Convert Farmland or Forest Land

The agricultural resources component of the Land Use Element has been developed to protect the integrity of agricultural and timberlands for continued productivity under the General Plan Update. The agricultural and timber land use designations reflect the County's goal to protect resource lands and allow residences that are incidental to principal use, and emphasize incentive-based programs that provide landowner assistance to minimize conversion of resource lands to other uses.

Although the General Plan Update protects agricultural lands and timberlands, it would allow the conversion of some lands to other uses to accommodate new development allowed. Most agricultural and timber land is located within the unincorporated area; however, there are also some important resource lands within the county's seven (7) cities. They too may allow some conversion of agricultural land or timberland to other uses. Therefore, development within the cities together with the development in the unincorporated area may contribute to cumulative conversion of agricultural lands.

Impact 3.2.3.2 Conflict with Agricultural Zoning, Williamson Act contracts, or Timberland Production Zoning

The policies, programs, and implementation measures of the General Plan Update would be consistent with the Williamson Act Property Tax Incentive Program and the TPZ regulations. These measures protect agriculture and timberlands from conflicts with new land uses on adjacent properties allowed under the General Plan Update. The land use code for the City of Arcata demonstrates compliance with agricultural zoning and Williamson Act requirements¹. No other cities have substantial agricultural lands or timberlands within their jurisdiction, and no other jurisdictions have TPZ zoned property. Therefore, potential cumulative impacts from conflicts with agricultural zoning, the Williamson Act and/or TPZ program are less than significant.

Impact 3.3.3 Utilities and Services

Impact 3.3.3.1. Wastewater Services

Implementation of the General Plan Update and the general plans of the county's seven (7) cities accommodate additional residents, businesses, and other development, which would increase the need for wastewater services. Some wastewater collection, treatment, and disposal facilities serving the unincorporated area and cities will need to be expanded to serve growth projected over the next 20 years.

The Community Infrastructure and Services Element of the General Plan Update was developed to provide policies and programs to ensure service capacity, including wastewater capacity, keeps pace with development. If it is not feasible to increase capacity, several policies in the General Plan Update would ensure that approved development in the County its cities is limited to available permitted capacity.

A mitigation measure in this EIR encourages service providers to design and implement new infrastructure improvements, including but not limited to water and wastewater capacity expansions, park and recreation facilities, and fire stations, in a manner that avoids or minimizes associated environmental impacts.

The requirements of the Basin Plan for the North Coast Region administered by the Regional Water Quality Control Board provides similar measures to protect public health and safety within cities the same as in the County. And new development under the General Plan Update in some unincorporated communities will be served by the same wastewater collection, treatment, and disposal facilities as development within cities. Based on the above information, this impact is considered less than significant on a cumulative level.

Impact 3.3.3.2. Water Supply

Residential, industrial, commercial and agricultural development allowed under the General Plan Update would place additional demands on Humboldt County's water resources. The General Plan Update seeks to focus growth in areas where development can be most easily accommodated with water supplies. Water provided by the Humboldt Bay Municipal Water District serves the entire Humboldt Bay region, including the cities of Eureka and Arcata. General Plan Update policies direct the County to work cooperatively with water service providers to plan and implement infrastructure projects to serve new development. For these reasons, cumulative impacts on water supply would be less than significant.

¹ For example, see the land use code for the City of Arcata at the following website: "<http://www.codepublishing.com/ca/arcata/>".

Policies contained in the Community Infrastructure and Services Element, Water Resources Element and Land Use Element would limit development potential if it is found that it would exceed the available water supply and capacity of water systems and ensure that it is not approved. Proposed mitigations in this EIR would further reduce cumulative water supply impacts that could result from development.

Impacts related to the construction and expansion of water facilities would be reduced to less than significant levels by policies and mitigation referenced in Chapter 3 of this EIR. However, the impacts to water supply and availability of planned development, and the effectiveness of related mitigation cannot be definitively determined or tested at this time. Future development within cities may impact water supply and availability in a similar manner, so this impact is considered cumulatively significant.

Impact 3.3.3.3. New Storm Water Drainage Facilities

The development of future land uses as designated in the proposed General Plan Update could exceed the capacity of storm drainage facilities and result in the need for drainage facilities and detention basins. The proposed General Plan Update policies described in Chapter 3 of this EIR reduce potential impacts from storm drainage facility construction.

Drainage requirements administered by the cities in the County and Regional Water Quality Control Board protect public health and safety from storm water impacts within cities as well as the County. And new development under the General Plan Update in some unincorporated communities will be served by the same stormwater collection facilities as development within cities. For these reasons, this impact is considered less than significant from a cumulative perspective.

Impact 3.3.3.4. Solid Waste Disposal

Development under the General Plan Update and city general plans would increase residential and commercial development which would increase solid waste generation. The General Plan Update includes policies and programs that would encourage a reduction in the amount of solid waste generated by land uses. Disposal capacity for the incorporated and unincorporated area remains above the 15-year capacity siting requirements with an estimated 26 year capacity (as of 2010) at the Anderson Landfill and up to 100 years at the Dry Creek Landfill.

Implementation of the General Plan Update and the city general plans could result in the need for additional transfer stations and recycling facilities, the construction of which could result in potentially significant impacts. The General Plan Update includes policies that reduce construction related environmental impacts as well as reduce the anticipated impacts by reducing waste. Mitigation measures are incorporated that require that the County implement waste reduction programs and participate in joint facility planning with local cities. Solid waste for the County is coordinated with the cities for efficiency. For all these reasons, cumulative impacts of solid waste disposal would be less than significant.

Impact 3.4.3 Public Services

Impact 3.4.3.1. Schools

Based on projected enrollment and population Humboldt County (including the cities and the unincorporated area) by the State of California, it is not expected that additional school facilities will be required to be developed to support projected growth during the planning period. Most school districts in the County experienced either no appreciable enrollment growth, or negative enrollment growth, over the last 15 to 20 years, and this trend is expected to continue for the next ten or more years.

The General Plan Update contains policies intended to ensure that school facilities are provided concurrent with new development consistent with this plan. School facility planning occurs on a regional level, independent of the County Board of Supervisors and city councils. And new development under the General Plan Update in some unincorporated communities will be served by the same public education services and facilities as development within the county's seven (7) cities. Therefore, cumulative impacts would be less than significant.

Impact 3.4.3.2. Fire Protection

Implementation of the General Plan Update and the general plans for the cities in the County would accommodate additional residents, businesses, and other development, which would increase the need for fire protection and emergency services. Fire departments may require additional facilities, equipment, and staff in order to provide adequate levels of service. The General Plan Update contains policies intended to ensure that fire related facilities are provided concurrent with new development consistent with this plan, and to require that new development contribute funds for construction of new or expanded facilities. The General Plans of the incorporated areas provide similar measures to protect residents from fire hazards and other emergencies.

Fire service and emergency service planning occurs on a regional level, independent of the County Board of Supervisors and city councils. And new development under the General Plan Update in some unincorporated communities will be served by the same fire and other emergency services and facilities as development within the county's seven (7) cities. For all these reasons, cumulative impacts would be less than significant.

Impact 3.4.3.3. Law Enforcement

Implementation of the General Plan Update and the city general plans would accommodate additional residents, businesses, and other development, which would increase the need for law enforcement services. The Sheriff's Department and city police departments may require additional facilities, equipment, and staff in order to provide adequate levels of service.

The General Plan Update contains policies intended to ensure that law enforcement facilities are provided concurrent with new development consistent with this plan and to require that new development contribute funds to new or expanded facilities. The General Plans of the incorporated areas provide similar measures to provide law enforcement, and law enforcement agencies operate under a mutual aid agreement, which leverages law enforcement protection across jurisdictional boundaries. New development under the General Plan Update in some unincorporated communities and in all the cities will be served by the same law enforcement services and facilities. Based on the above evidence, cumulative impacts of the General Plan Update on law enforcement services and facilities would be less than significant.

Impact 3.5.3 Transportation

Impact 3.5.3.1 – Vehicle Miles Traveled,

Impact 3.5.3.2 – Unacceptable Level of Service (LOS) on Roadways within the County

Impact 3.5.3.3 - Regional Level of Service Standard

Implementation of the General Plan Update and the city general plans would accommodate additional residents, businesses, and other development, which would increase the use of automobiles in the County and each of its cities. Chapter 3.5 Transportation, of this EIR evaluated the proposed General Plan Update's potential transportation impacts to the plan area, including impacts to facilities that extend into cities. This analysis assessed impacts of future development in unincorporated areas and cities in the County, so it has a cumulative focus.

In general, the General Plan Update seeks to reduce vehicle trips and trip length by planning more dense development within existing communities, improving pedestrian and bicycle facilities and connectivity, and encouraging transit service expansion. The General Plan Update includes policies to reduce the length and frequency of vehicle trips by encouraging mixed use zoning; focusing planned residential uses within neighborhood and town centers, thereby locating residential development in proximity to transportation and work; ensuring neighborhood connectivity; and providing incentives for housing and infrastructure development in housing opportunity zones located within urban development areas.

Mitigation measures are identified which provide for transportation demand management and congestion relief, and make transportation improvements to reduce vehicle trips within the plan area. However, the efficacy of these mitigation measures cannot be assured, so the following road segments are expected to operate at an unacceptable level of service under the General Plan Update and the general plans of the seven incorporated cities:

- U.S. 101 Between S.R. 255 in Arcata and 6th Street in Eureka
- Main St, Between 7th St and 13th Street, Fortuna
- Kenmar Road between U.S. 101 NB Ramps and S. Fortuna Blvd, Fortuna

Based on the above information, the General Plan Update would result in a cumulatively significant impact in terms of vehicle miles traveled, unacceptable LOS on the above listed roadways within the County, and conflict with a regional level of service standard.

Impact 3.5.3.4. Air Traffic

The Safety Element policies and standards along with the established airport land use compatibility plans would protect future operations of the airports under the General Plan Update, and provide for the safety and compatibility of adjacent land uses. Because future land uses and development would continue to be subject to these regulations and policies, this impact is considered less than significant for the County. And because cities are also required to conform to airport land use compatibility plans, this impact would be less than significant on a cumulative level as well.

Impact 3.5.3.5. Road Safety

The proposed Circulation Element has goals, policies and standards to provide safe and efficient circulation system to all communities, neighborhoods, recreational facilities under the General Plan Update. It contains policies to ensure that roadway design reduces roadway safety hazards and accommodate multi-modal users. The general plans for the county's seven (7) cities also contain policies to ensure a safe and efficient circulation system.

The General Plan Update would prioritize improvements that address existing safety problems and design new improvements to meet appropriate standards. The county's seven (7) cities and the County jointly participate in developing and implementing the Regional Transportation Plan which coordinates funding for road safety improvements. Therefore, General Plan Update impacts relating to road safety would be less than significant on a cumulative level.

Impact 3.5.3.6. Inadequate Emergency Access.

Implementation of General Plan Update policies and standards would help ensure that adequate emergency access is in place to serve planned development, and that development density is consistent with available emergency access. These policies and programs, in concert with existing standards, reduce the likelihood that implementation of the General Plan Update

would result in inadequate emergency access. The General Plans of the incorporated areas provide similar measures to protect residents from inadequate emergency access.

Emergency access planning within cities and surrounding unincorporated areas occurs on a regional level, with the joint participation of the fire districts, County Board of Supervisors and city councils. And new development under the General Plan Update in some unincorporated communities will be served by the same emergency access as development within the county's seven (7) cities. For all these reasons, cumulative impacts of the General Plan Update relating to inadequate emergency access would be less than significant.

Impact 3.5.3.7. Conflict with Multi-Modal Policies, Plans, or Programs

The proposed policies contained in the General Plan Update are supportive of the Regional Transportation Plan, and encourage the consideration of transportation impacts in land use decision making in coordination with the county's seven (7) cities. Therefore, the General Plan Update would not conflict with policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities in a cumulative manner.

A significant portion of planned development is outside areas served by transit providers. These areas are distant from cities, and not likely to be affected by policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities approved by cities. Therefore, General Plan Update impacts relating to multi-modal policies, plans, or programs would be less than significant on a cumulative level.

Impact 3.6.3 Noise

Impact 3.6.3.1. Noise Exposure, and

Impact 3.6.3.2: Groundborne Vibration and Construction Noise

Development allowed under the proposed General Plan Update and the general plans for the cities in the County would potentially increase noise levels and groundborne vibrations in the vicinity of the various future construction sites. Commercial and industrial sources of noise and vibrations would be localized and not likely to contribute significantly to cumulative noise related impacts. Buildout of the General Plan Update and the seven city general plans would increase vehicle miles traveled and congestion on numerous streets and highways, which would increase noise levels along these road segments.

The General Plan Update requires the application of noise impact combining zones in areas where noise standards are exceeded, and the use of project-specific noise mitigation measures including completion of acoustical studies, use of buffering, and implementation of other noise abatement measures. Implementation of this program and others in the General Plan Update and in Chapter 3 of this EIR would reduce the potential that noise levels in areas around new noise-sensitive land uses to exceed the Land Use/Noise Compatibility Standards. Implementation of noise standards for industrial development, and the proposed noise control ordinance would further reduce potential impacts, bringing these impacts down to less than significant levels.

It is possible land uses in cities within the county may contribute noise and vibration sources that are inconsistent with standards in the General Plan Update. And increased noise from additional motorized vehicles traveling to and from new development in the cities will likely increase noise traffic in the County. However, the County has no jurisdiction over cities, and it is beyond the scope of the General Plan Update to coordinate regional adoption of its policies and standards.

Therefore, the General Plan Update would result in less than significant cumulative impacts in terms of this standard of significance.

Impact 3.6.3.4: Airport Noise

The General Plan Update requires the application of noise impact combining zones near airports where noise levels exceed adopted standards. It also requires project-specific noise mitigation measures on future discretionary projects as necessary (completion of acoustical studies, use of buffering, and implementation of other noise abatement measures,). Implementation of these programs reduce the potential for new development to be exposed to unacceptable noise levels near airports to less than significant levels.

Policies and standards in the Airport Master Plan also prevent noise conflicts between future operations of the airports and adjacent land uses. Future land uses and development will continue to be subject to these regulations and policies. Since cities are also required to conform to airport land use compatibility plans, this impact is less than significant on a cumulative level as well.

Impact 3.7.4 Hazards and Hazardous Materials

Impact 3.7.4.1: Hazardous Materials

Land use and development consistent with the General Plan Update, and uses and development within the seven incorporated cities would likely result in increased use, storage, and disposal of hazardous materials in the county. In addition, hazardous waste sites or generators could be located near sensitive receptors. This could result in an increased likelihood that sensitive receptors such as schools and residential areas would be exposed to hazardous materials.

Development under the proposed General Plan Update and the general plans for the county's seven (7) cities will be required to adhere to state and federal hazardous materials regulations including regulations for worker and public safety, operation of underground storage tanks, and disposal and clean up of contaminants. Additional mitigation measures are proposed in this EIR to reduce impacts of exposure to hazardous materials. Based on the above information, cumulative impacts from exposure to hazardous materials is considered less than significant.

Impact 3.7.4.2: Airport Safety Hazards

Policies and standards in the Airport Master Plan are designed to protect adjacent land uses from airport operations. Future land uses and development under the General Plan Update will continue to be subject to these regulations and policies. A proposed new mitigation measure in this EIR will implement an Airport Land Use Compatibility Overlay to ensure the new zoning designations under the General Plan Update are consistent with the Airport Land Use Compatibility Plan, which will reduce this impact to less than significant levels. Cities are also required to conform to airport land use compatibility plans, so the impact of airport safety hazards is less than significant on a cumulative level as well.

Impact 3.7.4.3: Emergency Response Plan

Growth is expected to occur in each jurisdiction in the county under their general Plans. The implementation of these General Plan Update policies would help ensure that adequate emergency access, evacuation, and management procedures are in place, and public safety providers and emergency responders are properly prepared to respond to a major emergency. The proposed General Plan Update requires that future development comply with CEQA review of potential impacts on adopted emergency response or evacuation plans, and would implement any required mitigation measures. These policies and programs, in concert with

existing project review procedures, would reduce the risks of land uses interfering or impairing emergency response times and the ability to execute evacuations during emergencies. With these mitigation measures in place, this impact is considered less than significant.

Cities participate in joint emergency preparedness planning and exercises with the County. Humboldt County Ordinance 2203 established the Humboldt Operational Area (OA) and identified the Sheriff as Director of Emergency Services for the County. The Humboldt OA is composed of the County of Humboldt, serving as the lead agency, and all cities and special districts within the County. The County Office of Emergency Services (OES) assists the Sheriff in controlling and directing the effort of the emergency organization of the County and cities.

When a city cannot effectively handle a crisis with their own available resources and organization, they request OA assistance. OAs will provide whatever available resources and assistance which can be mobilized locally from county assets and from other Cities and Special Districts within the county. Based on this information, the impacts of the proposed General Plan on emergency response plans is less than significant on a cumulative level as well.

Impact 3.7.4.4: Flooding and Tsunami Risk

Cumulative impacts relating to flooding and tsunami risk are analyzed in later in Section 3.10.3, Hydrology and Water Quality, Impact 3.10.3.4, Housing within a 100-year Flood Hazard Area or Expose People or Structures to Flooding from Levee or Dam Failure, Tsunami, or Mudflow.

Impact 3.7.4.5: Wildland Fire Risk

Most of Humboldt County is located within high or very high fire hazard severity areas. The proposed General Plan Update and the plans of the seven incorporated cities would allow new dwelling units to be developed within or adjacent to high and very high wildfire hazard areas.

The proposed policies, standards and implementation measures listed in Chapter 3 would reduce the exposure of people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas, or where residences are intermixed with wildlands. Mitigation measures would specify additional fuel treatments and reduce density in rural areas.

Cities in the County may allow some development in areas with high fire hazards, which could spread into adjacent unincorporated areas. Adding additional development within areas of high and very high hazard would expose people or structures to a significant risk of loss, injury or death involving wildland fires. Therefore, this impact is considered a significant cumulative impact.

Impact 3.8.3 Geology, Soils, Tsunami Risk

Impact 3.8.3.1: Exposure to Seismic-Related Hazards

Humboldt County, including each of the county's seven cities, is underlain by geologic features that have, and can contribute to seismic events. As population within unincorporated areas together with the seven (7) cities increases, so would the impacts associated with geologic hazards. As more land is exposed to new development, the possibility of increased geologic hazard impacts would grow.

The General Plan Update contains policies requiring the identification of structural hazards and detailing natural hazard areas so that development projects can be sited outside of hazard areas. Mitigation measures proposed in this EIR would require that new development may be approved only if it can be demonstrated that the site is suitable for the proposed development.

State laws and policies and programs in the general plans of cities also help reduce risks from geologic hazards. These measures will reduce or avoid exposure to many potentially significant risks due to rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, and tsunamis.

However, virtually all of Humboldt County has the potential for loss of life and property due to fault rupture and strong seismic ground shaking, and there are many areas subject to liquefaction and landslide hazards, and tsunami hazards, including areas within the cities. Increasing population within the area can be viewed as increasing the exposure of people to geologic hazards. Therefore, this would be a cumulatively significant impact.

Impact 3.8.3.2 Soil Erosion or the Loss of Topsoil

The General Plan Update requires that site-specific reports addressing geologic hazards be prepared and that grading standards and best management practices be employed to reduce sedimentation and avoid erosion. However, the General Plan Update will allow additional development in areas of soil instability, which will likely increase soil erosion and the loss of topsoil which may degrade water quality. Development within cities may contribute to cumulative impacts from soil erosion or the loss of topsoil. Accordingly this is considered a significant cumulative impact.

Impact 3.8.3.3. Soil Stability

Development under the General Plan Update and the general plans of the cities in the County may result in the placement of new structures within geologic units or on soil that is unstable or that would become unstable, potentially resulting in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. The County's Building Regulations address potential soil stability hazards by requiring soils reports and site specific engineering where necessary.

It is possible cities within the county may allow development on unstable soils that are inconsistent with standards in the General Plan Update, which may expose people in surrounding unincorporated areas to hazards from unstable slopes. However, the County has no jurisdiction over cities, and it is beyond the scope of the General Plan Update to coordinate regional adoption of its policies and standards. The California Building Code provides soil classification guidelines for expansive soils. If a structure would be located on expansive soils, then special design considerations would be required. These requirements apply to the County as well as its seven (7) cities. Based on the above information the General Plan Update will result in less than significant cumulative impacts in terms of this standard of significance.

Impact 3.8.3.4. Septic Suitability

Some areas in Humboldt County, including each of the county's seven cities, are underlain by soils incapable of supporting septic systems in areas without public wastewater systems. As population within these unincorporated areas together with the seven (7) cities increases under their general plans, so would the impacts associated with failing septic systems.

The General Plan Update contains policies and standards that address the siting of proposed new systems and existing failed septic systems. It would require new on-site wastewater disposal systems to meet the current requirements of the Basin Plan and state law, and that programs be implemented to abate failing systems to eliminate health hazards. Cities within the county are subject to the same Basin Plan requirements and state laws. Also, the County's Health Department provides contract personnel to assist cities to comply with Basin Plan and other state requirements.

It is possible cities within the county may allow development on unsuitable soils that are inconsistent with standards in the General Plan Update, which may expose people in surrounding unincorporated areas to hazards from failing septic systems. However, the County has no jurisdiction over cities, and it is beyond the scope of the General Plan Update to coordinate regional adoption of its policies and standards. Based on the above information the General Plan Update will result in less than significant cumulative impacts in terms of this standard of significance.

Impact 3.9.3 Mineral & Energy Resources

Impact 3.9.3.1: Loss of Known Mineral Resources, and

Impact 3.9.3.3: Loss of Known Energy Production Site

Mineral and energy resource extraction sites are primarily located within the unincorporated portions of the county; there are no known resource extraction sites within the seven (7) cities in the County that provide materials not available from other sites in the County. Proposed General Plan Update polices, standards and implementation measures addressing mineral and energy resources would reduce potential impacts to the availability of known mineral or energy production sites to a less than significant level. The EIR identifies additional mitigation with the same intent. Based on the above information, there are not cumulative impacts that go beyond those mineral and energy extraction activities assessed within the county jurisdictional area. The proposed General Plan Update's cumulative impact with respect to mineral resource and energy extraction is considered less than significant.

Impact 3.9.3.2: Mining and mineral recovery operations may impact adjacent uses. As mentioned above, mineral and energy resource extraction sites are primarily located within the unincorporated portions of the county. Some of these sites occur near cities in the County, and may impact adjacent uses within cities. Proposed General Plan Update polices, standards and implementation measures, and new policies proposed in this EIR would reduce potential impacts to adjacent uses to a less than significant level. These include compliance with applicable laws that govern surface mining and reclamation, and by implementing policies to assist in the proper placement of mining and quarry activities, and notification to surrounding uses. Public hearings would be open to city residents, and notification of homes along haul routes will include affected County and city residents.

Based on the above information, there are not cumulative impacts that go beyond those mineral recovery and mining activities assessed within the county jurisdictional area. The proposed General Plan Update's cumulative impact on adjacent uses with respect to mineral recovery and mining activities is considered less than significant.

Impact 3.9.3.4: Increased Energy Consumption

Impacts relating to increased energy consumption are analyzed in the discussion of Impact 3.12.3, Air Quality and Greenhouse Gas Emissions and Impact 3.12.5.4, Greenhouse Gas Emissions below.

Impact 3.10.3 Hydrology, Drainage, and Water Quality

Impact 3.10.3.1: Degrade Water Quality or Exceed Waste Discharge Requirements, and
Impact 3.10.3.3: Alter the Existing Drainage Patterns or Exceed the Capacity of
Stormwater Drainage Systems

Construction projects in the unincorporated area under the General Plan Update plus construction in the seven (7) cities under their general plans could cumulatively impact water

quality, alter existing drainage patterns, or exceed the capacity of stormwater drainage systems. If multiple construction projects occurred in the same watershed, the projects could cumulatively impair water quality if a storm event carried sediment and other construction site pollutants from the projects into receiving waters. The result would be excessive sediment loading that would reduce flood flow capacity locally and downstream in flood channels and impair water quality.

Such impacts would be reduced by compliance with existing County requirements, including the Humboldt County Grading, Excavation, Erosion, and Sedimentation Control Regulations and the National Pollution Discharge Elimination System (NPDES) permitting process. Under the Phase II NPDES program, construction sites larger than one acre are required, among other activities, to implement construction-related Best Management Practices (BMPs).

The proposed General Plan Update focuses regulatory attention and protections in watersheds where future development would result in cumulative water quality impacts that could affect threatened and endangered species. The General Plan Update lessens potential impacts by conducting planning on a watershed basis, requiring sediment and erosions controls, controlling the discharge of other pollutants, encouraging low-impact development design, and implementing a drainage ordinance.

The General Plan Update also includes policies to reduce the potential for the substantial alteration of existing drainage patterns through development, which could result in flooding on or off site. In addition, this EIR requires mitigation measures to specify peak stormwater discharge levels from new development, and control sediment discharge. This would minimize water quality and storm discharge impacts of future land uses and development.

Cities may adopt development standards that are inconsistent with standards in the General Plan Update or this EIR. For example cities may have less protective standards to minimize soil erosion from construction sites. However, the County has no jurisdiction over cities, and it is beyond the scope of the General Plan Update to coordinate regional hydrology, drainage, and water quality planning. Based on the above information, implementation of the General Plan Update policies and EIR mitigation measures would reduce impacts to water quality, alterations of existing drainage patterns, and impacts to capacity of stormwater drainage systems and this impact will be a less than significant cumulative impact.

Impact 3.10.3.2: Deplete Groundwater Supplies or Interfere With Groundwater Recharge
Implementation of the General Plan Update will likely result in the construction of additional impervious surfaces that decrease the land area available for the infiltration of rainwater by the soil, thereby reducing groundwater recharge. The development of streets and drainage systems, as well as construction on hillsides that typically require the construction of retaining walls and subsurface drainage features, can also divert groundwater to surface drainage systems and reduce groundwater recharge. In addition, the development of new groundwater wells serving new development under the General Plan Update has the potential to deplete groundwater supplies.

To address these impacts, the General Plan Update and this EIR provides protections for groundwater basins and assesses potential cumulative impacts to groundwater as part rural subdivisions and zone reclassifications. These mitigation measures reduce this impact to less than significant levels. Cities may adopt development standards that are less protective than those in this EIR. However, the County has no jurisdiction over cities, and it is beyond the scope of the General Plan Update to coordinate regional groundwater planning. Therefore, the General Plan Update would result in less than significant cumulative impacts in terms of this standard of significance.

Impact 3.10.3.4: Housing within a 100-year Flood Hazard Area or Expose People or Structures to Flooding from Levee or Dam Failure, Tsunami, or Mudflow
Development allowed under the General Plan Update may place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map; place within a 100-year flood hazard area structures which would impede or redirect flood flows; expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam, or inundation by seiche, tsunami, or mudflow.

The Water Resources Element comprehensively deals with water management and conservation issues, and incorporates various policies and implementation measures that would serve to avoid placing housing in the 100-year flood hazard area. The policies, standards and implementation measures would also serve to avoid exposing people or structures to a significant risk of loss, injury or death involving flooding, including flooding because of the failure of a levee or dam, or from inundation by seiche or mudflow. Chapter 3 of this EIR describes mitigation to pursue funding to carryout probabilistic mapping to show likely areas subject to tsunami hazards. These measures reduce the flood hazard impacts to less than significant levels.

Future development within cities under their general plans is required to conform to the same federal standards for preventing flood hazards as referenced in the General Plan Update. Cities may adopt development standards relating to tsunami hazards that are less protective than those in this EIR. However, the County has no jurisdiction over cities, and it is beyond the scope of the General Plan Update to coordinate regional tsunami hazard planning. Therefore, the General Plan Update would result in less than significant cumulative impacts in terms of this standard of significance.

Impact 3.11.3 Biological Resources

Impact 3.11.3.1 Sensitive Species and Sensitive Habitat Areas,

Impact 3.11.3.2. Wetlands

Impact 3.11.3.3. Wildlife Corridors and Nursery Sites

Buildout of the General Plan Update in conjunction with the general plans of the seven (7) incorporated cities would contribute to the cumulative reduction in undeveloped land and could result in significant adverse effects on the County's biological resources, including sensitive species and sensitive habitat areas and wetlands. Policies in the Land Use and Housing Elements would encourage unincorporated area development within urbanized areas and substantial development within cities would be within existing urbanized areas. Urbanized areas are less likely to have important biological resources because habitat has largely been displaced by buildings, roads, parking and other development.

State and federal laws, as well as the General Plan Update, contain comprehensive measures to avoid and minimize adverse impacts on special status species to the maximum extent

practicable. Additional mitigation is proposed in this EIR to reduce this potential impact to a level of less than significant.

State and federal laws protecting biological resources would apply in cities as well as the County. Cities may adopt development standards that are less protective of biological resources than the General Plan Update and this EIR. However, the County has no jurisdiction over cities, and it is beyond the scope of the General Plan Update to coordinate adoption of its policies and standards. Therefore, the General Plan Update would result in less than significant cumulative impacts in terms of this standard of significance.

Impact 3.11.3.4. Local Policies and Ordinances, and
Impact 4.4.2.6. Habitat Conservation Plans

This EIR did not identify any inconsistencies between the proposed General Plan Update and local habitat conservation plans or other relevant local policies and ordinances protecting biological resources. It is possible cities may adopt development standards that are inconsistent with standards in the General Plan Update. For example cities may have less protective standards than those in this EIR. However, the County has no jurisdiction over cities, and it is beyond the scope of the General Plan Update to coordinate regional adoption of its policies and standards. Therefore, the General Plan Update would result in less than significant cumulative impacts in terms of this standard of significance.

Impact 3.12.4 Air Quality

Impact 3.12.4.1. Conflict with Air Quality Plan or Violate an Air Quality Standard
Ongoing development resulting from the proposed General Plan Update and general plans of the cities in the County will result in emissions from vehicles and construction equipment, power and gas consumption, and dust from excavation and grading that typically accompanies new construction of residential, commercial, industrial and resource uses. As the population increases in the region, vehicle emissions are also expected to increase as well because more people will be making more vehicle trips. These impacts will reduce air quality in localized areas.

Humboldt County is in attainment of all federal and state criteria air pollutant standards, except for State Particulate Matter (PM₁₀) levels, for which the entire North Coast Air Basin is currently designated as a non-attainment area. (Particulate matter is the term used for a mixture of solid particles and liquid droplets found in the air.)

The General Plan Update and this EIR contain measures to avoid and minimize adverse impacts air quality impacts. Because the air basin is currently in non-attainment for PM₁₀, cumulative development allowed under the General Plan Update and the general plans for the cities within the county will likely continue to contribute PM₁₀ emissions, thereby violating air quality standards for PM₁₀ emissions. Therefore, in terms of this standard of significance, the General Plan Update will have significant cumulative impacts.

Impact 3.12.4.2. Sensitive Receptors

The EIR considers residentially designated land uses, hospitals and nursing/convalescent homes, hotels and lodging, schools and day care centers, and neighborhood parks as sensitive receptors. The General Plan Update and the general plans of the cities within the county allow new residential, commercial and industrial construction, which will likely result in temporary air quality impacts when it occurs near sensitive receptors. Similarly, diesel-fueled vehicle emissions along roadways may involve temporary air quality impacts to nearby sensitive receptors. Mining and agricultural operations allowed under the General Plan Update, and placement of new commercial and industrial establishments with significant air emissions would have more permanent air quality impacts to nearby sensitive receptors.

Because of their short duration, impacts to sensitive receptors from emissions of diesel particulate along roadways and from construction activities are considered less than significant. Policies in the General Plan Update such as Policy AQ-P6 promote improving air quality through land use planning decisions, and implementation measure AQ-IM2 requires coordination with the North Coast Air Quality Management District on development proposals for new sources of toxic air pollutants. With these mitigation measures, the permanent air quality impacts of the General Plan Update to sensitive receptors are reduced to less than significant levels.

Since there are such limited mining and agricultural operations within cities in the county, the potential cumulative air quality impacts from these sources are insignificant on a cumulative level. And because of their short duration, cumulative impacts to sensitive receptors from emissions of diesel particulate along roadways and from construction activities are also considered less than significant.

It is possible cities in the county may adopt development standards for new commercial and industrial establishments that are less protective of sensitive receptors than those in the General Plan Update. However, the County has no jurisdiction over cities, and it is beyond the scope of the General Plan Update to coordinate regional adoption of its policies and standards. Therefore, the General Plan Update would result in less than significant cumulative impacts in terms of this standard of significance.

Impact 3.12.4.3. Objectionable Odors

Agricultural operations and placement of new commercial and industrial establishments under the General Plan Update and the general plans of the cities within the county which have significant odor emissions could create significant objectionable odors. General Plan Update policies, programs, and standards described in Impact 3.12.5.2 above would lessen the effects of objectionable odors on people in the County. In particular, Policy AQ-P6, Buffering Land Uses, and Standard AQ-S3, requires that the CARB *Air Quality and Land Use Handbook* be utilized when considering buffers between new commercial and industrial sources of emissions and sensitive receptors. The *Air Quality and Land Use Handbook* contains specific guidance relating to potential sources of odor complaints. With implementation of the General Plan Update policies, the potential for creation of objectionable odors would be less than significant.

It is possible cities in the county may adopt development standards for new commercial and industrial establishments that are less effective at controlling odors than those in the General Plan Update. However, the County has no jurisdiction over cities, and it is beyond the scope of the General Plan Update to coordinate regional adoption of its policies and standards. Therefore, the General Plan Update would result in less than significant cumulative impacts in terms of this standard of significance.

Impact 3.13.4 Climate Change and Greenhouse Gas Emissions**Impact 3.13.4.1. Greenhouse Gas Emissions**

Given the scope of global climate change, it is not anticipated that a single development proposed pursuant to the General Plan Update or the general plans of the cities within the county, would have an individually discernable effect on global climate change (i.e., that any increase in global temperature or sea level could be attributed to the emissions resulting from the proposed development). Also, review of the state goals for reducing GHG emissions indicate that the proposed General Plan Update would not conflict with the goals identified in AB 32, which sets out the local requirements for reducing overall state's GHG emissions.

However, the Chapter 3 of the EIR concludes substantial GHG emissions indirectly related to the General Plan Update and the general plans of the cities within the county will combine with emissions across California, the U.S., and the globe to cumulatively contribute to global climate change. Thus there is a potential for a cumulative significant impact.

To mitigate for that potential cumulative impact, the General Plan Update includes policies, standards, implementation measures and land use strategies for energy, traffic, land use, community design, water conservation, and air quality which incorporate all applicable identified measures to reduce GHG emissions. Additionally, the County has joined ICLEI and committed to the Cities for Climate Protection Campaign's five milestones which will serve to mitigate for potential increases in GHG for the proposed General Plan Update. This mitigation would reduce the contribution by the unincorporated area toward global greenhouse gas emissions; however, implementation of the proposed General Plan Update would result in a significant unavoidable cumulative greenhouse gas emissions impact considering the other emissions from the cities in the county, and from other parts of California and the globe.

Impact 3.14.3 Cultural Resources**Impact 3.14.3.1. Historical Resources**

New agricultural, residential, commercial and industrial development contemplated by the General Plan Update and the general plans of the cities within the county has the potential to impact historic resources either through direct impacts to resources themselves or impacts to their immediate surroundings. Because of the widespread distribution of historic resources in Humboldt County, the potential for significant impacts on resources and/or their immediate surroundings exists in community centers, rural centers, rural lands, agricultural lands and public lands.

The proposed General Plan Update includes policies, standards, and implementation measures to reduce potential impacts to historic resources. Additional mitigation contained in this EIR will serve to reduce potential impacts to historic resources but not to a less-than-significant level. The proposed project could indirectly result in the demolition of historic structures when building sites are prepared for new construction. Since new development within cities may also impact historic resources, the cumulative impacts of the General Plan Update on historic resources are considered significant as well.

Impact 3.14.3.2. Archaeological and Paleontological Resources

Future development in accordance with the General Plan Update and the general plans of the cities within the county may impact historic and pre-historic resources if the construction sites of the individual projects are located near or within sensitive archaeological and paleontological sites. Development in currently undeveloped areas may have an impact on undiscovered archeological and paleontological resources. The cumulative effect of these projects would

contribute to the loss of subsurface cultural resources if these resources were not protected upon discovery.

Situations could occur in which significant archaeological deposits could be damaged or destroyed as result of development that is consistent with the General Plan Update. Policies and implementation programs contained in the General Plan Update address these situations and provide for the identification, evaluation, and mitigation of impacts on archaeological and paleontological resources. The programs contained in the General Plan Update would reduce potential impacts on archaeological and paleontological resources to less-than-significant levels.

Impact 3.15.3 Parks and Recreation

Impact 3.15.3.1. Deterioration of Parks and Recreational Facilities.

Population growth expected to occur over the planning period under the General Plan Update, is expected to utilize park and recreation facilities at a similar rate as the current population. In general, significant deterioration of existing parks and recreation facilities would occur if population growth and park use outpace the maintenance and improvements to parks and recreation facilities resulting in the deterioration of existing facilities.

Goals, policies, standards and implementation measures contained in the Community Infrastructure and Services Element, as well as of the Conservation and Open Space Elements are intended to address potential impacts to parks and recreation. Implementation Measure IS-IM29, Parks and Recreation, in particular would create a program that specifies standards for establishing impact fees for capital improvements and Mello Roos Community Facilities Districts or special assessment to ensure adequate funding for park and recreation facility operation and maintenance as well as the replacement of park and recreation facilities that deteriorate as a result of growth allowable under the General Plan Update. With these measures in place, the General Plan Update is expected to have a less than significant impact on the deterioration of park and recreation facilities.

While the cities within the County have developed impressive park and recreation facilities within their jurisdictions, it is possible cities within the county may place less importance on park and recreation facilities in the future, resulting in a significant shift toward more use of parks and recreation facilities in the unincorporated areas and possible degradation of County facilities. However, the County has no jurisdiction over cities, and it is beyond the scope of the General Plan Update to coordinate regional adoption of its policies and standards. And new development under the General Plan Update in some unincorporated communities will be served by the same park and recreation facilities as development within the county's seven (7) cities. Therefore, the General Plan Update would result in less than significant cumulative impacts in terms of this standard of significance.

Impact 3.15.3.2. Construction of New Recreational Facilities

The General Plan Update and the general plans for the cities within the county would accommodate population growth, which would lead to increased demand for recreational facilities within the area. Policies, programs, and implementation measures contained in the General Plan Update would impose requirements on discretionary development to provide adequate parkland and recreation facilities to offset additional demands. And construction of those new facilities may involve potentially significant environmental impacts.

The General Plan Update contains policies that are intended to reduce impacts from new development relating to: air quality; multi-modal levels of service; and aesthetics. And new

mitigation proposed in the EIR encourages service providers to minimize or avoid future adverse impacts and to mitigate them where feasible. However, the construction or expansion of local park and recreation facilities may be carried out by other local agencies, and park construction may occur within cities. Therefore, the County cannot eliminate the potentially significant effects associated with the construction or expansion of local park and recreation.

However, the County has no jurisdiction over cities or other local agencies, and it is beyond the scope of the General Plan Update to coordinate regional adoption of its policies and standards. Therefore, the General Plan Update would result in less than significant cumulative impacts in terms of the construction of new park and recreation facilities.

Impact 3.16.3 Scenic Resources

Impact 3.16.3.1 Scenic Vistas and Impact 3.16.3.2: Visual Character

Adverse changes to scenic resources resulting from the implementation of the proposed General Plan Update and the general plans of the cities within the county could result from a number of mechanisms. These include dramatic large and small-scale shifts from one land use to another, such as the change from open space to urban use, or project-specific impacts such as construction of large homes on hillsides or ridgelines. Such changes may also be caused by an incremental change over time, such as the trend towards residential use in areas where the existing principal land use is timber or grazing. In addition, the proposed General Plan Update would allow growth between communities that could diminish the value that these open spaces provide to community character and could result in potentially significant impacts to visual character.

The proposed General Plan Update includes policies and implementation measures intended to protect aesthetic and visual resources. However, even with the proposed mitigation measures the General Plan Update is expected to have significant impacts on scenic vistas and visual character. There are some important visual resources and community characteristics within the county's seven (7) cities. Their general plans too may allow some impacts to visual resources and community character. Therefore, development within the cities together with the development in the unincorporated area may contribute to significant cumulative impacts to visual resources and community character.

Impact 3.16.3.3: Sources of Light and Glare

Cumulative development within the county and the cities in the county would contribute to cumulative light pollution and nighttime sky impacts. Policies and programs in the General Plan Update would require all existing and new outdoor lighting shall be compatible with the existing setting. However, additional sources of outdoor lighting such as streetlights, housing, and commercial structures, etc., whether in the cities or in the unincorporated area would make a cumulatively considerable contribution to light pollution and nighttime sky impacts. This impact is considered significant on a cumulative level.

Impact 3.17.4 Energy Consumption and Conservation

Impact 3.17.4.1. Land uses or development patterns cause wasteful, inefficient, or unnecessary consumption of energy

Cumulative residential and commercial development generated by population growth during the General Plan Update planning period could cause wasteful, inefficient, or unnecessary consumption of energy that have an adverse physical effect on the environment. Policies and programs in the General Plan Update would increase energy efficiency and conservation. However, because the County and the cities have not yet adopted GHG or energy conservation thresholds that would prevent wasteful and inefficient energy use, the degree to which land uses and the development within the County and cities cause wasteful, inefficient, or unnecessary consumption of energy cannot be determined. This impact is considered significant on a cumulative level.

5.3 Growth Inducing Impacts

CEQA requires an EIR to describe any growth-inducing impacts that would result from the proposed action. This section first describes the types of actions that tend to induce growth, and then discusses those impacts as they generally relate to the proposed action. The section then addresses four specific actions that potentially lead, directly or indirectly, to more growth, namely: (1) fostering economic or population growth; (2) removing existing obstacles to growth; (3) other precedent-setting actions; and (4) developing or encroaching upon existing open space.

§15126.2(d) The Growth-Inducing Impact of the Proposed Action. Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may further tax existing community service facilities so consideration must be given to this impact. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

Based on Section 15126.2(d), a plan is considered growth-inducing if it would: directly or indirectly foster economic growth, population growth, or the construction of additional housing; if it would remove obstacles to population growth; if it would draw down the capacity of community service facilities to the extent that construction of new facilities would be necessary; or if it would encourage or facilitate other activities that cause significant environmental effects. For example, expanding road capacity or sewer and water facilities is typically considered "growth-inducing" because such projects generally alleviate existing problems and/or inefficiencies, as well as provide capacity for some additional growth.

State law requires the General Plan to serve as a comprehensive, long-term plan for the physical development of Humboldt County. The General Plan Update does not propose any specific development projects, so it will not directly involve any growth inducing impacts. However, indirect growth-inducing impacts would occur because the proposed land use designations

and their locations, along with goals, policies, and implementation measures of the General Plan Update will provide a framework for future growth and development within the unincorporated area of Humboldt County. The environmental effects related to potential growth are analyzed in more detail in Chapter 3 of this EIR.

5.3.1 Foster Economic or Population Growth

Table 5-1 presented earlier in this chapter projects approximately 2,738 new housing units will be constructed in the unincorporated area between 2010 and 2040. The proposed General Plan Update would allow a maximum of 38,970 units at buildout. In addition, the proposed General Plan Update designates substantial amounts of vacant land to accommodate future industrial, commercial, agricultural, timber, natural resource, public facility and coastal dependent uses.

Land uses and future development consistent with the General Plan Update would result in additional housing; development of agriculture, commercial, and industrial-related land uses; and the development of public services and infrastructure within the unincorporated area. The proposed General Plan Update would accommodate growth within the unincorporated area and seek to encourage growth in Community Planning Areas (CPAs). Within CPAs, the proposed General Plan Update would accommodate growth in Urban Development (UDAs) and Water Service Areas (WSAs) within developed communities that have additional land and service capacity.

The proposed General Plan Update would directly or indirectly facilitate construction-related employment. Construction workers would likely come from throughout the county to work within the plan area. In the long term, new employees would likely be hired, and businesses would indirectly create additional demand for goods and services. In the long term, the proposed General Plan Update would directly or indirectly facilitate business growth. This could increase incomes of new residents, and people already inside the planning area, which would also increase demand for goods and services, leading to additional growth.

The potential increase in population and economic activity resulting from the proposed General Plan Update could be considered growth inducing. However, the State of California Department of Finance projects population growth for Humboldt County and the County is required to plan for such growth. The State of California released population projections for California counties in July, 2014 (State of California, Department of Finance, *Population Projections for California and Its Counties 2000-2050*, Sacramento, California, December 2014). These new projections indicate that the population of Humboldt County in the year 2040 will be 138,307, an increase of 3,684 people.

The guiding principles of the General Plan Update are to preserve and enhance the character of Humboldt County, ensure the long-term protection of timber agricultural land uses and natural resources, to provide sufficient developable land for housing for all income levels, and to retain and create living-wage job opportunities. It also identifies new urban development areas adjacent to existing urban communities.

5.3.2 Remove Obstacles to Growth

Growth may result from the removal of physical and regulatory obstacles that have in the past limited growth. Obstacles or impediments to growth can include the lack of infrastructure, lack of public services, or land use planning constraints such as restrictive General Plan policies.

New residential and commercial development under the proposed General Plan Update would result in construction of new streets to provide adequate access. Infrastructure improvements will also be necessary to support the new development. Typically these improvements are sized to also accommodate additional growth in the surrounding area.

While some unincorporated communities are already largely urbanized and contain site-serving infrastructure, some infrastructure would have to be upgraded or expanded to accommodate new growth. In this sense, the proposed General Plan Update would induce growth by encouraging development of new infrastructure to support an orderly development pattern.

The proposed General Plan Update also includes an expansion of Urban Development Areas and Water Service Areas to include additional land. Urban Development Areas and Water Service areas as depicted on land use maps represent the maximum extent to which development at urban intensities is planned. Implementation of the proposed General Plan Update would remove regulatory obstacles in these areas to allow future expansion of communities to accommodate anticipated growth.

5.3.3 Precedent-Setting Actions

Actions that are associated with the proposed General Plan Update that could be considered precedent-setting are changes in General Plan land use and zoning designations, expansion of Urban Development Areas and Water Service Areas, and planning for infrastructure improvements.

By changing land use and zoning designations of properties from agricultural to rural residential uses, for instance, the General Plan Update may be setting a precedent for future conversion of resource lands to non-resource uses. Expanding urban areas and improving infrastructure in resource areas raises those same resource land conversion issues. These actions could facilitate the development of future projects, such as subdivisions and residential housing developments. The General Plan Update and this EIR contain policies, standards and implementation programs to reduce the environmental impacts of future growth. Similar policies, standards and implementation programs and environmental documents will be needed to offset impacts of future plans and projects that follow.

5.3.4 Development of or Encroachment upon Open Space

The Land Use Diagram and new proposed General Plan Update policies were developed to avoid areas containing natural resources such as wetlands and dune habitat. Rather than encroach upon open space, the proposed General Plan Update largely preserves lands designated Natural Resources (NR), Agriculture Exclusive (AE), Timberland (T) and Public Facilities (PF), which might otherwise be developed under the existing 1984 Framework Plan.

However, as noted above, the General Plan Update would allow the conversion of some agricultural lands. And there is no absolute prohibition of development in natural resource areas. As such, the General Plan Update development may convert Prime Farmland to nonagricultural use, and may encroach into natural resource areas.

5.4 Long Term Benefits Versus Short Term Gains

As described in CEQA Guidelines §15065(a)(2), a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the project has the potential to achieve short-term environmental goals to the disadvantage of long-term

environmental goals. The proposed General Plan Update is a policy document that is intended to guide new development through the year 2030. As such, it is considered to take a long-term view of the County's future.

The General Plan Update avoids making changes to land use designations that involve short term gains with long term costs. For example, the General Plan Update includes policies, standards and implementation programs to support commercial development. Commercial development is expected to generate funds for the County as it gets developed with commercial establishments because the County will receive a share of the sales tax revenue from the sales and services offered. If these establishments are developed quickly, that could be considered a short term gain.

The General Plan Update also includes policies, standards and implementation programs to support resource uses, such as agriculture, timber production and mining. Natural resource development is also expected to generate funds for the County as resources are produced because the County will receive a share of the tax revenue from these sources of income. These resource uses are long term; they have been providing revenue to the County for many years, and are expected to continue for many years to come, particularly with the supportive policies, standards and programs in the General Plan Update.

By avoiding the placement of commercial land use designations on resource lands, the General Plan Update land use diagram avoids impacting the long-term benefits derived from resource lands. The policies, standards and implementation programs in the General Plan Update are also designed to avoid long term impacts for short term gains.

5.5 Mandatory Findings of Significance

CEQA requires that an EIR must be prepared when certain specified impacts may result from construction or implementation of a project. Under Section 15065(a) of the CEQA Guidelines, a finding of significance is required if a project "has the potential to substantially degrade the quality of the environment." In practice, this is the same standard as a significant effect on the environment, which is defined in Section 15382 of the CEQA Guidelines as "a substantial or potentially substantial adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance." An EIR has been prepared for the proposed General Plan Update, which fully addresses all of the Mandatory Findings of Significance, as described below.

This EIR, in its entirety, addresses and discloses all potential environmental effects associated with implementation of the proposed General Plan Update, including direct, indirect, and cumulative impacts in the following resource areas:

- Land Use, Population and Housing
- Agricultural and Timber Resources
- Utilities and Services
- Public Services
- Transportation
- Noise
- Hazards and Hazardous Materials
- Geology and Soils
- Mineral and Energy Resources
- Hydrology and Water Quality
- Biological Resources

- Air Quality and Greenhouse Gas Emissions
- Cultural Resources
- Parks and Recreation
- Scenic Resources

The analysis discusses all of the following potential impacts:

- Potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels;
- Potential to threaten to eliminate a plant or animal community;
- Potential to reduce the number or restrict the range of a rare or endangered plant or animal; and
- Potential to eliminate important examples of the major periods of California history or prehistory.

As summarized in Section 1.5.5 (Summary of Impact and Mitigation Measures), this EIR discloses all potential environmental impacts, the level of significance prior to mitigation, requirements that are otherwise specified by law or are incorporated as part of the project description, feasible mitigation measures, and the level of significance after the incorporation of mitigation measures.

5.6 List of Organizations and Persons Consulted in Preparation of the EIR, and the Preparers of the EIR

List of Organizations and Persons Consulted in Preparation of the EIR

Cities:

Eureka – Lisa Shikany (former staff)
Fortuna - Stephen Avis (former staff), Liz Shorey

Community Service Districts:

Humboldt CSD - Steve Davidson (former staff)
Willow Creek CSD - Steve Paine (former staff)
Garberville SD - Mark Bryant (former staff), Jennie Short
McKinleyville CSD - Norman Shopay (former staff),
Humboldt Bay Municipal Water District – Carol Rische (former staff)
Redway CSD - Troy Harrington (former staff)
Loleta CSD - Markus Drumm (former staff)

Fire Districts:

Garberville FPD - Kent Skown
Redway FPD – Brian Anderson
Acrata FPD – John McFarland
Blue Lake FPD – Ray Stonebarger

Tribes:

Karuk Tribe - Hélène Rouvier (former staff)
Wiyot Tribe - Brie Fraley (former staff)
Bear River Rancheria - Janet Eidness

Blue Lake Rancheria - Erica Collins

Humboldt County Departments:

Humboldt County Planning and Building Department:

Planning Division - Steve Werner and Steven Santos

Building Division - Todd Sobolik and Delilah Moxon

Economic Development Division - Dawn Elsbree and Jacqueline Debets (former staff)

Natural Resources Division -

Humboldt County Health Department:

Environmental Health Division – Dave Spinosa (former staff), Maje Hoyos, Harriet Hill

Public Health Division – Dr. Ann Lindsay (former staff)

Humboldt County Public Works Department:

Roads Division – Bob Bronkall

Airport Division – Bob Bronkall

Natural Resources Division – Hank Seeman, Cybelle Immitt

Humboldt County Assessor – Mari Wilson, Linda Hill, Joan Watanabe

Humboldt County Department of Emergency Services – Dan Larkin

Humboldt County Agricultural Commissioner – Jeff Dolf

Humboldt County Sheriff's Department – Mike Downey

Humboldt Waste Management Authority – Karen Sherman, Patrick Owen

Humboldt County Farm Bureau – Katherine Ziemer

Humboldt County Historical Society – Don Tuttle

North Coast Growers Association – John LaBoyteaux

State of California:

Department of Fish and Game – Jane Arnold, Michael VanHatten

California Coastal Commission – Bob Merrill

North Coast Air Quality Control Board – Rick Martin

University of California Extension Services, Yana Valachovic, Deborah Giraud

California Department of Public Health – Ronnean Lund

Federal Agencies:

Soil Conservation Service – Sue Aszman

Consultation Firms:

ESA
TJKM
Winzler and Kelly
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Michael Wheeler, Senior Planner
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Lisa Shikany, Senior Planner
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