



# Humboldt Regional Climate Action Plan and CEQA GHG Emissions Thresholds

## Final Environmental Impact Report Errata

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## Purpose

This erratum is to address:

1. Confusion related to the relationship between the Regional Climate Action Plan (RCAP) and the California Environmental Quality Act (CEQA) Greenhouse Gas (GHG) Emissions Thresholds and Guidance Report and
2. To amend Mitigation Measure NOI-2 to accommodate for existing CEQA exemptions for certain public transportation projects that are in effect until 2040 per California Senate Bill 71.

## Clarification of the relationship between the RCAP and the California Environmental Quality Act GHG Emissions Thresholds and Guidance Report

Concern has been expressed that the per capita emissions shown in the project description (Table 2-7) of the EIR are the figures used to evaluate impacts in the EIR and are the basis of the RCAP. The per capita emissions figures used in Table 2-7 of the EIR were recommended as part of the Thresholds and Guidelines document but do not reflect the RCAP or the analysis of the RCAP in the DEIR. The figures used reflect a 50% reduction in per capita emissions below what would be achieved with the RCAP targets. These emissions figures were proposed to allow the County to meet the 2045 targets with less severe requirements post 2030. The per capita emissions should reflect the RCAP per capita emissions if the 2030 goals are met. The following discussion will demonstrate this. Each jurisdiction can set lower Thresholds and still be consistent with the RCAP and the EIR.

The RCAP was prepared to reduce GHG by 40 percent from the 1990 baseline by 2030 and to set the stage for achieving an 85 percent reduction by 2045. The thresholds in the Thresholds and Guidelines document were developed by calculating the per capita emissions level that would result in achieving the 2030 GHG emissions reduction target identified in the RCAP.

In the Greenhouse Gas Emissions Thresholds and Guidance Document on page 29, states the following: *The urban and rural GHG efficiency thresholds are calculated by dividing the remaining 2030 GHG emissions from new development (i.e., residential and nonresidential) by the net increase in demographics in 2030. Table 7 shows the initial results of this calculation.*

**Table 1 Humboldt Initial Urban and Rural GHG Emissions Thresholds**

|                                                                                 | 2030 New Development |                     |                                       |
|---------------------------------------------------------------------------------|----------------------|---------------------|---------------------------------------|
|                                                                                 | New Residential      | New Non-Residential | New Mixed-Use <sup>1</sup>            |
| <b>Urban<sup>2</sup></b>                                                        |                      |                     |                                       |
| GHG Emissions Forecasted (new MT CO <sub>2</sub> e) <sup>3</sup>                | 11,393               | 13,637              | 25,030                                |
| Demographic Metric                                                              | 3,140 new residents  | 1,678 new employees | 4,818 new service people <sup>4</sup> |
| GHG Efficiency Threshold (MT CO <sub>2</sub> e per demographic metric per year) | 3.63 per resident    | 8.13 per employee   | 5.19 per service person               |
| <b>Rural<sup>5</sup></b>                                                        |                      |                     |                                       |
| GHG Emissions Forecasted (new MT CO <sub>2</sub> e) <sup>3</sup>                | 15,670               | 16,041              | 31,711                                |
| Demographic Metric                                                              | 4,284 new residents  | 1,967 new employees | 6,251 new service people              |
| GHG Efficiency Threshold (MT CO <sub>2</sub> e per demographic metric per year) | 3.66 per resident    | 8.16 per employee   | 5.07 per service person               |

These Thresholds represent the per capita emissions in 2030 if the targets of the RCAP are achieved. For determining a level of significance under CEQA, using thresholds consistent with the RCAP is consistent and appropriate. In this scenario, if a project generated GHG below this level it would be consistent with the RCAP and thus would constitute a less than significant impact.

The California Environmental Quality Act Greenhouse Gas Emissions Thresholds and Guidance document finds that the thresholds in Table 7 meet the 2030 target but allow for higher GHG emissions from development than is necessary with existing development techniques. The Thresholds further explain: *To better position Humboldt for an efficient pathway to achieve the long-term 2045 target and align with GHG emissions thresholds seen throughout the State, the Humboldt initial urban and rural thresholds (shown in Table 9) were reduced by 50 percent.* Table 9 presents the adjusted urban and rural GHG emissions thresholds for Humboldt.

**Table 2 Humboldt Adjusted Urban and Rural GHG Emissions Thresholds**

|                                                                                       | 2030 New Development |                     |                                  |
|---------------------------------------------------------------------------------------|----------------------|---------------------|----------------------------------|
|                                                                                       | New Residential      | New Non-Residential | New Mixed-Use <sup>1</sup>       |
| <b>Urban</b>                                                                          |                      |                     |                                  |
| GHG Efficiency Threshold<br>(MT CO <sub>2</sub> e per demographic<br>metric per year) | 1.81 per resident    | 4.06 per employee   | 2.60 service person <sup>2</sup> |
| <b>Rural</b>                                                                          |                      |                     |                                  |
| GHG Efficiency Threshold<br>(MT CO <sub>2</sub> e per demographic<br>metric per year) | 1.83 per resident    | 4.08 per employee   | 2.54 service person              |

Thresholds in this table were then incorporated into the project description for the Draft Environmental Impact Report (DEIR) as Table 2-7. Table 2-7 of the DEIR is as follows:

**Table 2-3 Humboldt Locally Applicable Plan/Project CEQA Urban and Rural GHG Emissions Thresholds**

|                                                                                       | 2030 New Development |                     |                                  |
|---------------------------------------------------------------------------------------|----------------------|---------------------|----------------------------------|
|                                                                                       | New Residential      | New Non-Residential | New Mixed-Use <sup>1</sup>       |
| <b>Urban<sup>2</sup></b>                                                              |                      |                     |                                  |
| GHG Efficiency Threshold<br>(MT CO <sub>2</sub> e per demographic<br>metric per year) | 1.81 per resident    | 4.06 per employee   | 2.60 service person <sup>3</sup> |
| <b>Rural<sup>4</sup></b>                                                              |                      |                     |                                  |
| GHG Efficiency Threshold<br>(MT CO <sub>2</sub> e per demographic<br>metric per year) | 1.83 per resident    | 4.08 per employee   | 2.54 service person              |

Notes: MT CO<sub>2</sub>e = metric tons of carbon dioxide equivalent

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

<sup>2</sup> Urban areas in Humboldt include Fortuna, Arcata, and Eureka.

<sup>3</sup> The service population is equal to the residential population plus the number of employees.

<sup>4</sup> Rural areas in Humboldt include Blue Lake, Ferndale, Rio Dell, Trinidad, and unincorporated Humboldt County.

Source: Humboldt County. 2024. Draft California Environmental Quality Act Greenhouse Gas Emissions Thresholds and Guidance.

This can give the impression that the Thresholds calculated at 50% of the emissions thresholds generated by the RCAP were evaluated in the DEIR. These 50% thresholds should not have been included in the Project Description of the DEIR because they are not consistent with the 2030 goals of the RCAP and were not used for analysis in the DEIR. Table 2-7 of the Project Description should reflect the threshold generated from the RCAP identified in the Thresholds and Guidance document which is Table 7.

The following change is being made to page 2-50 of the DEIR, a component of the FEIR:

## Errata EIR Project Description

To align with the RCAP, separate GHG emissions thresholds for urban and rural areas have been developed. The RCAP disaggregates some measures between urban and rural regions to set goals that align with each region’s specific characteristics and capacity constraints. Urban areas in Humboldt are more densely developed areas in the region with greater access to energy and transportation infrastructure. Urban areas in Humboldt include Fortuna, Arcata, Eureka, and McKinleyville. Rural areas in Humboldt represent the dispersed communities in the region with limited access to energy and transportation infrastructure. These areas include the unincorporated County as well as Blue Lake, Ferndale, Rio Dell, Trinidad which have similar constraints. The GHG emissions thresholds follow this disaggregation between urban and rural areas to align with the RCAP and each areas’ capacity constraints. The efficiency thresholds, shown in Table 2-3, are expressed in terms of MT of CO<sub>2</sub>e per service person<sup>1</sup> are consistent with the GHG reduction goals of the RCAP and are applicable to plans or projects proposed within Humboldt with pre-2030 buildout or initial operational years:

**Table 2-4 Humboldt Locally Applicable Plan/Project CEQA Urban and Rural GHG Emissions Thresholds**

|                                                                                       | 2030 New Development                               |                                                    |                                                                   |
|---------------------------------------------------------------------------------------|----------------------------------------------------|----------------------------------------------------|-------------------------------------------------------------------|
|                                                                                       | New Residential                                    | New Non-Residential                                | New Mixed-Use <sup>1</sup>                                        |
| <b>Urban<sup>2</sup></b>                                                              |                                                    |                                                    |                                                                   |
| GHG Efficiency Threshold<br>(MT CO <sub>2</sub> e per demographic<br>metric per year) | <del>1.81</del> per resident<br><b><u>3.63</u></b> | <del>4.06</del> per employee<br><b><u>8.13</u></b> | <del>2.60</del> service person <sup>3</sup><br><b><u>5.19</u></b> |
| <b>Rural<sup>4</sup></b>                                                              |                                                    |                                                    |                                                                   |
| GHG Efficiency Threshold<br>(MT CO <sub>2</sub> e per demographic<br>metric per year) | <del>1.83</del> per resident<br><b><u>3.66</u></b> | <del>4.08</del> per employee<br><b><u>8.16</u></b> | <del>2.54</del> service person<br><b><u>5.07</u></b>              |

Notes: MT CO<sub>2</sub>e = metric tons of carbon dioxide equivalent

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

<sup>2</sup> Urban areas in Humboldt include Fortuna, Arcata, and Eureka.

<sup>3</sup> The service population is equal to the residential population plus the number of employees.

<sup>4</sup> Rural areas in Humboldt include Blue Lake, Ferndale, Rio Dell, Trinidad, and unincorporated Humboldt County.

Source: Humboldt County. 2024. Draft California Environmental Quality Act Greenhouse Gas Emissions Thresholds and Guidance.

<sup>1</sup> The service population is equal to the residential population plus half the number of jobs.

GHG emissions efficiency thresholds for beyond 2030 would need to be established later in conjunction with subsequent RCAP updates.

## **Amendment to Mitigation Measure NOI-2**

### **Purpose.**

At the Planning Commission hearing concern was expressed about Mitigation Measure NOI-2 which was written to address ground borne vibration during construction of new infrastructure which could affect nearby land uses. Recently California Senate Bill 71 was signed into law that extended exemptions for sustainable Transportation projects. Mitigation Measure NOI-2 is being modified to reflect this change in law.

California's Senate Bill 71 was signed into law in October of 2025 extending the existing CEQA exemptions for sustainable transportation projects initially established under SB 288. The exemptions apply to public projects for the protection, improvement, institution, or increase of microtransit, paratransit, shuttle, bus, ferry, bus rapid transit, or light rail service, including the protection, maintenance, construction, operation, or rehabilitation of stops, stations, terminals, or existing operations facilities, if used primarily by near-zero-emission, low oxide of nitrogen engine, compressed natural gas fuel, or hybrid powertrain vehicles.

Mitigation Measure NOI-2 is amended to ensure consistency with state law.

### **Page 3.7-24 Mitigation Measure NOI-2**

#### **NOI-2 PREPARE OPERATIONAL NOISE STUDY AND IMPLEMENT IDENTIFIED MEASURES**

Unless precluded by CEQA exemptions for the certain public transportation projects that are in effect until 2040 per California Senate Bill 71, this mitigation measure is applicable. For projects under the RCAP that install mechanical equipment and/or wind turbines, or that add new or increased transit service within the bus transit project screening distances listed in the FTA's Transit Noise and Vibration Impact Assessment, the reviewing agency (County or specific City) shall implement measures identified in a noise study, where applicable, for projects that result in operational noise impacts, and where feasible and necessary based on project and site-specific considerations. Project specific environmental documents may adjust these mitigation measures as necessary to respond to site-specific conditions.

The reviewing agency of a RCAP project that would install mechanical equipment, wind turbines, and/or new or increased transit service shall complete a detailed noise study based on project-specific details and location. Such a noise study shall identify the ambient noise levels in the project area, characterize the nearest sensitive receptors, estimate the noise levels proximate receptors will experience during operation of the individual project, compare estimated noise levels to the County or specific city noise level standards, outline any measures that are necessary to reduce operational noise levels, and determine the amount of noise reduction that would occur with implementation of these measures. Noise reduction measures may include, but would not be limited to, alternative site design, alternative orientation of noise sources, and construction of permanent berms and/or barriers. Noise reduction measures shall be implemented to reduce noise levels to the noise level standards or below, as feasible.