

## Acevedo, Megan

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**From:** Colin Fiske <colin.fiske@gmail.com>  
**Sent:** Monday, April 14, 2025 11:58 AM  
**To:** Planning Clerk  
**Cc:** Acevedo, Megan; COB  
**Subject:** Crucial Correction Needed to VMT Policy

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Planning Commissioners,

On Thursday, you will consider adopting a vehicle miles traveled (VMT) policy to establish thresholds and screening criteria for CEQA transportation impacts. The proposed policy establishes 15% below existing per capita VMT as the CEQA significance threshold for new residential and office projects, following guidance from the state.

**We support the -15% threshold. However, in order for the calculation of -15% to be defensible, an appropriate baseline for existing VMT must be established. Here, the proposed policy fails completely.**

The policy proposes to use the average per capita VMT of residents and employees in unincorporated Humboldt County as the baseline for calculation. That might sound reasonable at first, but it is not. Here's why:

1. The street and road network is completely integrated, and driving behavior is not influenced by jurisdictional boundaries, nor do such boundaries exert much influence on people's choice of where to live.
2. CEQA requires the consideration of foreseeable impacts regardless of jurisdictional boundaries.
3. VMT varies widely across the county, and averaging together the VMT of residents of denser urban and suburban areas (who generally drive much less) with the VMT of rural residents (who generally drive much more) results in a meaningless number.

To put it plainly: it makes no sense to treat residents and employees in Myrtle town or Cutten as if their driving habits have more in common with people in Petrolia than with the Eureka across the street. Residents of Eureka (and presumably adjacent neighborhoods) drive less than 14 miles per day on average, while residents of many rural parts of the county likely drive significantly more than 25 miles per day (see Table 1 [here](#)).

The misguided baseline produces calculations which are indefensible and frankly absurd. This is clearly illustrated in Figures 2 and 3 of the proposed [VMT Threshold Policy Guidelines](#), which show "low VMT" areas where new development would be assumed to have a less than significant CEQA impact (and screened out of additional analysis) because of lower-than-average amounts of driving. The maps claim that some of the most remote, rural, car-dependent parts of the county - places like Petrolia, Dinsmore, and Kettenpom - are "low VMT" for residents and/or employees, a result which should be enough on its face to debunk the calculation. No one can claim with a straight face that residents or employees in such places drive significantly less than average.

**The solution is simple: Divide the county into logical regions based on driving patterns, calculate the average VMT in each of these regions - including incorporated areas - and use that as the baseline for future projects in those regions.** A hypothetical example of a logical division of the county might be: Eureka Region, Arcata Region, McKinleyville Region, Fortuna Region, Rural Southern Humboldt Region, Rural Eastern Humboldt Region, and Rural Northern Humboldt Region.

Please note that including the VMT of residents and employees in incorporated cities in the baseline is required for a defensible result. While the county does not have land use jurisdiction in those areas, this is a proposed CEQA policy, and CEQA requires the analysis of impacts regardless of jurisdictional boundaries. The VMT of a new development adjacent to an incorporated city must be compared to a relevant baseline - i.e., one that includes people who live and work in that city.

We strongly urge you to change the baseline VMT figures in order to make the proposed thresholds and screening criteria logical and legally defensible.

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In addition to the overarching issue of baseline setting, there are also two significant problems with the county's list of proposed measures for VMT mitigation:

1. Research has consistently found that parking management is one of the most effective VMT reduction tools, but the staff report dismisses it entirely. It offers several justifications, none of which hold up to scrutiny. For example, it says there are "limited alternative transportation modes available," a statement that applies to some parts of the unincorporated county but not others, and also declares that reduced parking would "only increase vehicle miles traveled when searching for parking," an assertion that betrays a lack of knowledge about the tools of parking management (so-called "[cruising for parking](#)" can be addressed by measures including charging the market rate for parking to ensure a desired number of spots stay open). **Parking management must be included as a potential mitigation measure for VMT impacts in appropriate projects.**
2. "Use cleaner fueled vehicles" is proposed as a mitigation measure. While lower-emission vehicles are crucial for addressing issues like air quality and greenhouse gas emissions, they have no effect on VMT. Air quality and greenhouse gas emissions are analyzed separately from VMT under CEQA. **Thus, cleaner fuels are not a potential mitigation measure for VMT impacts.**

Thank you for your consideration of our comments.

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# Comments on Agenda Item F.4 VMT Threshold Policy Guidelines

by Jerome Qiriaz

## General Notes

1. Choice of 15% is from 2018 OPR guidelines and is not consistent with the latest guidance from CARB 2022 Scoping Plan which recommends 25% below 2019 levels.
  1. The County VMT Report by Fehr & Peers states, on page 17, that “OPR has not released updated guidance with respect to the reduction in VMT corresponding to the 2022 scoping plan. Therefore, lead agencies should be prepared to justify their reasoning when making threshold decisions and be able to explain it to project applicants, decision makers, and the public.” The County VMT Report reiterates this on page 21, and again on page 33.
  2. Staff have simply referred to the OPR Guidelines as justification for choosing 15%. This does not appear sufficient for justifying a lower recommendation than the 2022 Scoping Plan Update.
  3. The RTP targets a 25% reduction by 2030. As stated in the EIR Addendum<sup>1</sup> for the current RTP, the target was developed by a Greenhouse Gas Targets Committee established by the HCAOG Board for the creation of the Safe and Sustainable Targets (SST) found in the current RTP. I attended and contributed (as member of the public) to the discussions of this Committee. The reason the 25% target was selected was for consistency with the latest draft version of the 2022 CARB Scoping Plan Update that was available at the time of the Committee meetings. It is unfortunate that the EIR Addendum does not appear to capture this.
2. Why are census block groups used for the baseline data set instead of TAZs from the County’s TDM? TAZs have a higher resolution, and were also intentionally designed to capture variation in the existing land use of the County.
3. Streetlight methodology notes (no specific comments)
  1. Pg. 7 of the SB 743 Methodology and Validation White Paper says Streetlight excludes trips under 500 meters (0.3 miles), resulting in significantly lower estimate of trips under 2 miles. This would increase the VMT/capita estimate, and therefore increase the target threshold.
  2. The SB 743 Overview Readme from Streetlight says on page 3; “StreetLight’s sample does not capture 100% of trips every device makes. Thus, we expect the VMT Index/Device to be lower than the actual VMT/Capita.” This would reduce the VMT/capita estimate, and therefore lower the target threshold.
  3. For reference, I analyzed BTS Data<sup>2</sup> for HumCo back in Dec., 2021. Trips <1 mile accounted for about 28% of all trips in the County, and trips between 1-3 miles accounted for roughly 28% of all trips in the County.
4. The Cutten Development Project test case in Section 6 of the County VMT Report by Fehr & Peers represents an example of how the higher HBX value for Unincorporated County (22.1) compared to the adjacent City (13.68 for the City of Eureka in this case) allows for a project to avoid potentially useful VMT mitigation measures that may be appropriate for the project’s surrounding context. Consider using a City-based VMT baseline for Unincorporated Areas within the Sphere of Influence of the applicable City if the baseline for that City is less than that of Unincorporated County. This may also help to

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1 <https://ceqanet.opr.ca.gov/2013102063>

2 <https://data.bts.gov/Research-and-Statistics/Daily-Mobility-Statistics/w96p-f2qv>

support the adjacent City's VMT reduction goals. This comment also aligns with the second Major Limitation discussed in the Project Scale Strategies Section.

1. Consider treating McKinleyville as a City and also applying this approach to McKinleyville itself (and its Sphere of Influence if one is defined). This would require assessing baseline HBX and HBW values for McKinleyville.
5. The Nordic Aquafarms test case in Section 6 of the County VMT Report by Fehr & Peers represents an example of applying this policy to an industrial project. There is lack of clarity on whether this policy can defensibly apply to industrial projects. Please clarify. See also comment 7.1 below.

## Comments on Specific Sections of the VMT Threshold Policy Guidelines

### 6. Baseline VMT Section

1. In justifying the use of 2022 VMT data through to 2030, the last paragraph states "it is not anticipated that local trends in travel patterns will significantly change over the next five years." This conflicts with the RTP which targets a 25% reduction in VMT/capita by 2030, and the Draft Regional Climate Action Plan which targets significant increases in the % mode share of walking, biking, and transit.
  1. Please identify a better justification for not needing to update the baseline VMT.
  2. Please clarify when the next baseline VMT will be targeted for completion. Is the intent to release an update in the year 2030?

### 7. Thresholds of Significance Section

1. Thresholds are offered for residential, office, retail, and redevelopment projects. However, the VMT Metrics Section indicates that "industrial" and "commercial" projects are included. There is no reference to "industrial" or "commercial" in the Thresholds of Significance Section, nor in Table 1.
  1. Is it implied that a "commercial" project that isn't office or retail could only be considered under this policy if it (referring to Table 1)
    1. Is mixed use,
    2. Includes "100% affordable housing", or
    3. Is located near a major transit stop?
  2. Is it implied that an "industrial" project could only be considered under this policy if it (referring to Table 1)
    1. Is located near a major transit stop?
  3. There does not appear to be much if any discussion of industrial projects, or commercial projects outside of office or retail, in the Technical Advisory or the County VMT Report. It is not clear that this threshold policy can be defensibly applied to projects outside of residential, mixed-use, office, or retail. Please clarify and justify if the intent is to apply to projects outside residential, mixed-use, office, or retail.
2. Please align the four bullets under this Thresholds of Significance Section with Table 1 and the Project VMT Analysis Methodology Section. There is inconsistency in language, and there are items in Table 1 that are not addressed in the Thresholds of Significance Section or the Project VMT Analysis Methodology Section (see comment 8.1 below).

3. The third bullet states that a retail project will only cause significant VMT impact if it "... increases the average VMT for the County, HBX and HBW." This statement says the VMT threshold for retail projects is 0% below the baseline.
  1. Please justify why a retail project is allowed to generate more VMT than other projects.
  2. Clarify exactly what "average VMT for the County, HBX and HBW" means. Provide the equation. Bring into alignment / consistency with the guidance in the Project VMT Analysis Methodology Section.
4. The fourth bullet treats redevelopment projects the same as retail.
  1. Please justify why a redevelopment project is allowed to generate more VMT than other projects.
  2. Please clarify what a redevelopment project is and what it is not. Would this include abandoned land uses that are no longer active, such as the Samoa pulp mill?
8. Project Screening Section
  1. Map-based screening
    1. Clarify the language on this to align with OPR and Table 1 by stating that this only applies to residential and office projects.
    2. It is challenging to see how projects in the very rural low-VMT census block groups (i.e. the census block including Dinsmore, the large census block surrounding Blue Lake, or that including Petrolia) would achieve the intent of reducing VMT. Please further justify screening projects in these census blocks.
  2. Small Projects
    1. The County VMT Report by Fehr & Peers offers, on page 29, conversions of the 110 trip threshold to VMT per day and size of residential project. However, these conversions use 2012 CHTS data. Does the County intend to use these conversions to apply the screening for small projects? If so, please state this explicitly, and justify the use of 2012 CHTS data vs StreetLight data (which includes trip length information) for establishing these thresholds.
  3. The policy states that a project can be screened out if it can be "... demonstrated to primarily attract trips that would have otherwise been traveled at a longer distance."
    1. This language is very open ended. What does a developer need to do to demonstrate this? The concept is understandable on the surface but should not be presumed to result in 15% or 25% lower VMT without detailed analysis. For example, Schukei and Rowangould, 2024<sup>3</sup> observe that "... local access [defined as jobs and households in the same census block group] matters less in terms of travel behavior in rural contexts."
      1. I assume this also applies to "Local-Serving" as used in Table 1.
  4. Table 1
    1. "Residential and Office Projects" should be "Residential **or** Office Projects"
    2. "Near transit station" should be "Near Major Transit Stop"
      1. Does "minimum parking spaces required" include allowances in code for further reducing parking minimums?
    3. For "Local-Serving Retail", please clarify that "local-serving" means less than 50,000 per the Technical Advisory.

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3 <https://doi.org/10.7922/G2BG2M9G>

1. Please assess the estimated percentage of all existing retail that is below 50,000 square feet. In other words, does this screen out a majority of likely future retail projects?
5. Please add to Figure 3 the exceptions listed after the Figure, such as discretionary projects, qualifiers on projects within ½ mile of a major transit stop, etc. For example, the additional detail shown in the figure in Section 5.4 of the County VMT Report by Fehr & Peers.
9. Project VMT Analysis Methodology Section
  1. See comment 6.2 above.
  2. Is it possible to provide improved guidance to developers on best practices for estimating home-based VMT for determining compliance with the proposed thresholds? This will help ensure consistency in the approach used by project developers. For example, should the County TDM be used?
10. Mitigation – VMT Reduction Strategies Section
  1. Ensure alignment of the recommended strategies with the draft Regional Climate Action Plan (RCAP)
    1. Or perhaps simply use the measures in the RCAP if there is significant discrepancy between the RCAP measures and those in the Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (Handbook).
    2. If there is alignment between the RCAP and the measures selected from the Handbook, then state explicitly and justify.
    3. If measures from the Handbook are to be used, reference their ID in the Handbook. For example, “Increase Residential Density” is measure T-1 in the Handbook.
  2. Table 2 in the County VMT Report **should not** be used. For example the value of 31% for transit-oriented development is completely inappropriate for use anywhere in Humboldt County.
  3. I recommend referring to the Handbook instead of using Table 4 of the County VMT Report. Table 4 is a useful summary but should not be a substitute for using the Handbook.
  4. Much of the language in this section is pulled directly from the County VMT Report by Fehr & Peers. However, this language is a high level summary of the detailed guidance provided in the Handbook. If the Handbook measures are to be used (instead of those from the RCAP) do not copy the language from the County VMT Report into the Policy Guidelines. I recommend simply referring to the Handbook and requiring the use of the Handbook when applying the Project-Scale and Community-Scale measures. I recommend this for the following reasons:
    1. The County VMT Report cites the 2021 version of the Handbook. The latest version of the Handbook is dated October, 2024. It will presumably continue to be updated.
    2. There is significantly more detail and clarity provided in the Handbook that is important to understand when applying the recommended measures.
    3. There are numerous non-quantified measures listed in the Handbook that can help to significantly improve the likelihood of success of the recommended measures. It would be useful to allow these to be added to the mitigation strategies as well.
  5. If the Handbook measures are to be used (instead of those from the RCAP) consider adding language that requires consideration of including applicable non-quantified measures identified in the Handbook.
  6. “Use cleaner-fuel vehicles” strategy

1. This strategy does not reduce VMT. While it will reduce the GHG's associated with VMT, it will not reduce the health and safety impacts associated with VMT and single occupancy vehicles. This strategy requires significant further justification if it is to be used.

April 17, 2025

**To:** Humboldt County Planning Commission

**Subject:** Comments on VMT Threshold Policy Guidelines File # 25-538. Public Hearing April 17, 2025

**Dear Commissioners:**

Humboldt County has been moving forward with strategies for Climate Action and reductions in Greenhouse Gas Emissions (GHGs) to assist the State in achieving overall State goals. As shown in our comments submitted to the County (attached) on the Regional Climate Action Plan (RCAP), the County is actually carbon negative and is already contributing a net reduction in carbon.

**Threshold**

The proposed VMT Policy establishes a 15% reduction in VMT, but this reduction is based on the State meeting its goals, for which the County should not be held liable for. However, it appears that the boat has already sailed, and the County is committed to a 15% reduction, even though the County has the ability to select a lesser percent if it is supported by substantial evidence. **We strongly suggest the County limit the threshold to a 15% reduction and provide broader flexibility to the project screening criteria.**

The concept of establishing a threshold and standard methodology to address VMT under CEQA makes sense for the County, especially since so much effort has been put into it. However, this needs to be carefully thought out so that we are not painting our County in a corner and making development and economic stability more difficult.

**Baseline**

The argument for using StreetLight to estimate VMT rather than the County's Travel Demand Model (TDM) seems flawed. If there has been zero growth between 2010 and 2022 (Policy Guidelines page 3) the TDM from 2013 should be fairly reflective of current conditions. At a minimum, the results based on the StreetLight data should be compared to results from the TDM to see how they compare.

There is no discussion on how StreetLight data applies to rural areas. The data is very likely more representative of urban areas and does not reflect the majority of the County. This is not discussed in the VMT Study and it should be addressed.

VMT data is separated by US Census Block Groups, which may not be appropriate. Further review and adjustment should be considered. Larger regions of similar characteristics may be more appropriate. After a quick review of the data on the Humboldt County GIS we found multiple areas that are not very logical. For example, the intersection of Murray Road and Central Avenue. A project located just north of Murray Road would be subject to "Higher than County Average" while a project just south of Murray Road is in an area mapped as "Low VMT" and would be screened out. This doesn't make sense. There are multiple areas with similar inconsistencies. This is likely due to the fact that the Block Group boundaries are not boundaries associated with travel behavior. Logical boundaries could be better defined based on neighborhoods/communities with similar travel/population characteristics.



## Thresholds of Significance

Multiple project types are left out of the threshold discussion.

- How will visitor serving projects be addressed? Hotels, restaurants, tourism, ecotourism, etc. Will projects that encourage tourism/destination based development to our beautiful rural areas need full VMT analysis? Specific examples include redwood canopy tours, glamping, farm-to-table restaurants and experiences, special events, etc.
- How will industrial and commercial projects be evaluated?

The 15% reduction threshold may not be appropriate for rural areas. The total VMT should be evaluated. For example, the Block Group area around Petrolia has a VMT per resident of 30.20 miles (above the County & above 15%) and the VMT per employee is 9.94 miles (below the County & below 15%), however, the number of residents should be considered as the **overall** contribution may be insignificant due to population levels when compared to the County total or denser areas that have a larger contribution and higher rate of vehicle/pedestrian interaction. This data says if you live in the Petrolia Block Group you drive too far but if you work there you do not; This just doesn't make sense. The Policy will encourage more office projects, but would limit new housing, which is in deficit in our rural areas and is counterintuitive.

## Project Screening

There are no major transit stops in the unincorporated areas of Humboldt. Identifying transit stops that should apply or be accounted for, in the unincorporated areas, should be a priority. Urban based (e.g. major metropolitan/traffic areas) methodology for identifying major transit stops should be avoided and focus on rural characteristics should be encouraged.

Highway 101 should be considered a rural, high-quality transit corridor from at least Trinidad to Rio Dell and potentially beyond. Land use projects within a certain distance of this corridor should be presumed to have less than significant impact on VMT to allow more flexibility for project screening. This should also include unincorporated communities like Garberville, Petrolia, Shelter Cove, Redway, Alder Point, Willow Creek, etc. so that they are not disadvantaged.

Small project screening ó will this be handled similarly to how small projects are currently screened? For all projects consistent with zoning and land use?

The map-based screening, Low-VMT areas do not make sense. For example, rural areas outside of Garberville and Blue Lake would not require VMT analysis for residential projects? But Fortuna and parts of McKinleyville would be required? The Low-VMT areas for office projects appear to be in a lot of areas where the land use is likely not compatible with office projects, which is counterintuitive.

Near transit station ó What if the County changes the parking requirements so that the minimum is zero parking spaces? There should be flexibility for businesses to allow some parking, especially in areas with limited parking.

Affordable housing ó This should be for **all housing projects** in infill areas to encourage new housing, not just affordable housing. The Policy encourages subsidized housing only, not allowing for locally built, market rate housing, which is greatly needed and helps build wealth for young

residents and provides jobs for local builders. It is our experience that subsidized housing benefits very few local contractors and workers, often the work goes to firms located outside of Humboldt County.

Local Serving Retail & Redevelopment ó Agree with screening criteria.

### **Analysis of Land Use Projects**

The Policy states, *“Land Use projects that are inconsistent with the General Plan and Zoning Code are automatically considered inconsistent with VMT Policy and shall conduct a detailed VMT analysis.”*

- Does this include residential projects in infill areas?
- The Cutten Development test case in Section 6 of the VMT Study required an EIR and General Plan Amendment, but was screened out of further VMT analysis. This test case is inconsistent with the statement above.

Projects within 1-mile of a major transit stop

- Does this apply to infill projects?
- Replacing affordable housing units with lesser non-affordable housingÜ wouldn't this result in lesser VMT?

### **VMT Analysis Methodology**

The methodology relies on an “apples-to-apples” comparison. The County developed baselines using 2022 StreetLight data and the Policy suggests that analyses should use this data. How will this data be provided to applicants? This appears to be proprietary and limited to one “traffic consultant” that all applicants would be required to use? Also, this “traffic consultant” is the consultant the County hired to do the VMT Study & is the same consultant that recommended NOT using the County's TDM model. This doesn't seem right.

As discussed above, we question the applicability of StreetLight data in rural counties.

Thank you for the opportunity to comment.

Sincerely,  
Annje Dodd, PhD, PE and Praj White, PE

### **Attachment:**

Comments on Regional Climate Action Plan and Draft EIR

## Attachment - Comments on RCAP and DEIR

March 21, 2025

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*Sent via email to these addresses*

**Subject:** Comments on Humboldt Regional Climate Action Plan (RCAP) and CEQA GHG Emissions Thresholds Draft Environmental Impact Report (DEIR) dated February 14, 2025

### **Introduction**

The purpose of this letter is to provide comments on Humboldt Regional Climate Action Plan (RCAP) and CEQA GHG Emissions Thresholds Draft Environmental Impact Report (DEIR) dated February 14, 2025. Many of our clients, friends, and colleagues have asked us to address the RCAP and provide comments. This letter is the culmination of our review of the documents and many discussions we have had with clients, friends, colleagues, and the public.

The RCAP purpose and objectives are to adopt a qualified GHG reduction RCAP that may be utilized for streamlining CEQA GHG analyses for future projects. To qualify for CEQA streamlining, the RCAP must quantify GHG emissions and establish a level (threshold) below which the contribution of GHG emissions from activities covered by the RCAP would not be cumulatively considerable.

The County has experienced large economic downturns, first in logging and fishing, and now the cannabis industry. The County is struggling financially, is experiencing reduced economic capacity and difficulties enticing qualified professionals to relocate to the region. The RCAP assumes GHG emission reduction in the county through the RCAP would promote economic growth, funding opportunities, and expansion of renewable energy infrastructure, all of which are dependent on financial backing through general funds, grants, or financing opportunities. Of the thirty measures proposed in the RCAP, about twenty-eight include “feasibility studies”, all of which will require funding. Where will the funding actually come from? Will funding come from inflationary expenses such as increased agency fees, sales taxes, or property taxes? The cost of the plan will likely burden residents and small businesses already impacted by economic hardships in the County.

The RCAP and DEIR do not address the impact on the quality of life and sensitive economic conditions that exist in the County, or the fact that the County, although it may be impacted by climate change, is not the cause of climate change and does not contribute to climate change.

### The RCAP's Premise is Misleading Regarding County Impacts on Climate Change

The premise behind the need of the RCAP is that to avoid the “catastrophic” effects of climate change, GHG emissions in the County must be reduced significantly over the next two decades (RCAP Section 1.1 – Vision). While this may be true on a State and national level, the impact of emissions from the County are miniscule (Table 1). The County represents 0.4% of statewide emissions and 0.02% of national emissions.

The County’s impact on GHG emissions (or lack thereof) will not correct the “catastrophe” or forestall the effects of climate change. Although the County may be impacted by climate change, the county is a net sink (e.g., carbon negative - see discussion below) and is not the cause of the problem and should not be penalized for problems caused by the big contributors to GHG emissions.

*Table 1. Comparison of GHG Emissions (MMTCO<sub>2</sub>e = million metric tons of carbon dioxide equivalent)*

	<b>2022 GHG Emissions (MMTCO<sub>2</sub>e)</b>	<b>Source</b>
Humboldt County	1.5	RCAP
California	371.1	CARB Website
United States	6,343	EPA Website

It is fairly understood by the climate change community that countries with higher historical contributions to GHG emissions, typically wealthier nations, should bear the greater responsibility for reducing greenhouse gas emissions, ensuring a fair and equitable approach to climate change mitigation. This should also be applied to rural areas across the State which have much lesser contributions as well as depressed economic capacity. Those jurisdictions across the State that have greater economic capabilities as well as far more contribution should take the lead while not stymieing places like Humboldt County.

Using the statewide emissions (Table 1) as an estimate of the per capita emission rate and applying that to a county level, 97% of the GHG emissions are attributed to 33 of 58 counties in the state with populations over 150,000 (Table 2). Humboldt County’s population is about 136,000.

*Table 2. GHG Emission Contribution by County Population*

<b>Population</b>	<b>Total GHG Emissions (MMTCO<sub>2</sub>e)</b>	<b>Percent</b>	<b>Number of Counties</b>
Counties with Less than 150K	11.7	3%	25
Counties with Greater than 150K	359.4	97%	33

### The County is Beyond Carbon Neutral, it is Carbon Negative and Climate Positive

The RCAP is a planning document developed to help the **State as a whole** meet its GHG reduction goals, which are to reduce GHG emissions in accordance with the **State's goal** of 40% below 1990 levels by 2030 and carbon neutrality by 2045. The **State's** plan to achieve carbon neutrality is to create a reduction of **statewide** anthropogenic GHG emissions of 85% below 1990 levels by 2045, with the remaining 15% reduction anticipated to be achieved through removal of carbon dioxide from the atmosphere, including sequestration in forests, soils, agriculture lands, and other natural landscapes, which the County has in abundance.

Eighty percent of the County's 2.3 million acres are forested; 55% is private commercial timberland and 35% is State or federal public land (DEIR Section 2.1). Forests act as a huge carbon sink. According to research at Penn State<sup>1</sup>, preventing forest loss in California on 1-acre of forestland avoids the release of 109.4 MTCO<sub>2</sub>e. Delaying harvests for 1-year on 1-acre of forestland helps avoid the release of 2.2 MTCO<sub>2</sub>e per year. This is likely a conservative estimate as coastal redwoods and Douglas fir can sequester 4.2 MTCO<sub>2</sub>e per acre per year<sup>2</sup>. According to the RCAP and DEIR, the existing per-capita emission rate in the County is 11.2 MTCO<sub>2</sub>e and the projected forecasted 2030 rate (with the State's mandated measures incorporated) is 10.2 MTCO<sub>2</sub>e. Between 18% and 40% of the forested land in the County would be required to offset existing and adjusted forecasted emissions at 2.2 to 4.2 MTCO<sub>2</sub>e per acre per year through 2045 (Table 3). This does not account for the additional reductions/sinks achieved from the County's natural and working lands that are not included in the forest inventory (e.g., 690,000 acres of agricultural land within the County, wetlands, and coastal habitats). Thus, the County is already beyond carbon neutral. The County is carbon negative and climate positive because it goes beyond carbon neutral by actively removing more carbon than is emitted, contributing a net reduction.

*Table 3. County Carbon Emissions Offset by Carbon Sequestration of Existing Forest Land (Adjusted Forecast is GHG emissions with state requirements implemented and no RCAP in place).*

Year	Adjusted Forecast from RCAP (MTCO <sub>2</sub> e)	Population (DEIR Table 3-1)	Emissions per Capita (MTCO <sub>2</sub> e/Person)	Acres of Forest to Offset per Capita Emissions (Acres/Person)	Total Forest Area Needed to Offset Emissions (Acres)	Percent of Total Available Forest Area to Maintain Carbon Neutrality
2022	1,531,167	136,132	11.2	2.7-5.1	364,564-695,985	20%-38%
2030	1,459,598	143,566	10.2	2.4-4.6	347,523-663,454	19%-36%
2045	1,387,943	151,406	9.2	2.2-4.2	330,463-630,883	18%-34%

<sup>1</sup> [The Economic Value of Private Forests and Climate Change Mitigation](#), Melissa Kreye, February 2023

<sup>2</sup> [Forest Carbon Projects – Mendocino and Humboldt Counties](#)

None of this is included or discussed in the RCAP or the DEIR because it would mean that the County is carbon negative (beyond climate neutral) and further reduction in emissions is not necessary to assist the State in meeting its goals. Thus, economic and development constraints are not necessary within the RCAP, the County is climate positive without the RCAP in place. The RCAP should focus on achieving State mandated reductions and actions that allow the County to grow while achieving carbon neutrality.

The RCAP states under Strategy 11 – Increase Carbon Sequestration (CS), *“The State goal of reaching carbon neutrality by 2045 relies on up to 15 percent of total emissions being removed via carbon sequestration. At this time, the technology is not available to achieve this level of carbon removal and further analysis would need to be conducted to determine the possibility of achieving this through improved natural land management in Humboldt’s forests and wetlands”*. Under Measure CS-3, the RCAP acknowledges that the County may be a sink, but states that this cannot be verified without a comprehensive inventory of carbon stocks in the region. *“Measure CS-3 directs the County to build off of North Coast Resource Partnership’s 2017 Northern California regional natural working lands study to establish an updated County-wide Natural and Working Lands GHG Inventory baseline by 2027”*. This disregards the OBVIOUS lands within the County that are already acting as sinks and making the County carbon negative. The premise behind these strategies appear to be based on strategies from larger, more densely populated counties that are high contributors to GHG emissions and NEED to capitalize on natural and working land and mechanical methods to meet the State’s carbon neutrality goals by 2045.

### **The DEIR Provides an Incorrect Determination of CEQA GHG Emission Thresholds**

GHG Thresholds are introduced in the DEIR and are set at the level of GHG emissions that new development would need to achieve to be consistent with the RCAP communitywide emissions target of 1,241,589 MT of CO<sub>2</sub>e by 2030.

First, the DEIR does not detail how the thresholds are calculated. Second, the thresholds only apply to plans or projects with pre-2030 buildout or initial operation years. Thresholds beyond 2030 would need to be established later in conjunction with subsequent RCAP updates. This makes it difficult for new projects beyond 2030, especially when the land use entitlement process for new projects can take many years. Third, the thresholds don’t take into account that the County is carbon negative. The thresholds should be based on allowing the county to grow and prosper with the goal of maintaining carbon negativity or carbon neutrality.

The majority of GHG emissions can be attributed to the State’s most densely populated cities and counties, which have grown and prospered while Humboldt County has declined and struggled. CEQA GHG emission thresholds provided in the DEIR imply that the County should have limited growth and penalize new development. Humboldt County should be allowed to thrive, prosper, and develop by utilizing its existing natural resources and carbon sinks. Thresholds should be determined based on a buildout scenario that the County is able

to achieve while maintaining carbon neutrality with a focus on sequestering and optimizing natural and working lands and utilizing credits from future offshore wind projects.

The County should not send its carbon credits elsewhere in California, nationally, or the world. The County should get credit for and be allowed to build and grow to become a healthy, local, economic self-sustaining region. The County and its residents should not be penalized for being sustainable.

The RCAP should account for all measures that the State already mandates communities to comply with, which helps the County maintain climate positivity without additional, non-mandated, penalties (e.g., taxes, fees, construction costs, electricity costs, etc) to the County's residents.

### **Streamlining CEQA GHG Analyses – Does it Really?**

*“The overall purpose of the RCAP and CEQA GHG Emissions Thresholds is to prepare, adopt, and implement a qualified GHG reduction plan that may be utilized for mitigating and tracking Countywide GHG emissions as well as for streamlining CEQA GHG analyses for future projects within the County that are required to undergo CEQA review”.* Not only does this include reducing emissions (as discussed above, the County is beyond carbon neutral) it includes, demonstration of *“a level of GHG emissions below which the County would have less-than-cumulatively-considerable GHG impacts for future environmental planning reviews and provide CEQA streamlining for projects via the Humboldt Regional CEQA GHG Checklist”.* It was shown above that the County's emissions do not contribute to the State or global concerns, thus, the CEQA GHG Emissions Threshold presented in the DEIR is not applicable to the County.

The RCAP and DEIR state that the County's goal is to adopt GHG Thresholds and a GHG Analysis Compliance Checklist. If projects are not consistent with either of these, the project would be required to conduct full CEQA GHG emissions analysis and comparison to the GHG Thresholds. However, the GHG Thresholds are only for projects / operations through 2030. There is no streamlining for projects beyond 2030 that are not consistent with the checklist or thresholds. In addition, the County has yet to provide a “Compliance Checklist” and how it will evaluate project's consistency with the RCAP.

Thus, for all other projects, will the projects need to demonstrate carbon neutrality along with costly mitigation measures? Especially when development costs and regulations in the County are already out of control.

For example, the RCAP does not appear to afford streamlining for development projects in rural communities (if they do not meet the “infill” definition). The RCAP does not provide a definition of “infill”, which would be different for a rural County compared to Los Angeles, San Francisco, or Sacramento. Streamlining infill projects within the “Urban” areas is not sufficient and discriminates against the County's rural communities.



Tourism is a major economic driver in the County. The County needs to protect ecotourism and destination-based tourism and rural attractions. How will GHG thresholds and Compliance Checklist impact the ability to develop camping, glamping, and tourism in our rural areas and urban/rural interface?

Another example is the goal of RCAP Measure TR-3, which is to reduce regional VMT by increasing mixed-use development in infill priority areas in alignment with HCAOG's baseline connectivity score included in the Regional Transportation Plan. What are infill priority areas? How will HCOAG's connectivity score be applied? This is only a "supportive" action with no reduction in GHG emissions provided. How will this be incorporated into the checklist? How will potential mixed use and residential projects located within rural communities, urban clusters, and /or lower VMT areas (refer to Humboldt County Average VMT on Humboldt County Web GIS) be streamlined and avoid costly environmental documentation and delays.

Also, it should be noted that the "streamlining" only applies to GHG Emissions. There are many other elements in CEQA that this does not apply to and would not streamline the entire CEQA process.

### **There is too Much Focus on VMT Reduction**

The State is mandating electrification of vehicles. With vehicle electrification, VMT is becoming less of an important, valid parameter for GHG emission impacts.

Projects in rural communities should not be penalized due to the lack of transit or perceived larger VMT, considering these are small, disadvantaged populations in an area that is already carbon negative. Rural areas are penalized by the VMT measurement, for example, in a rural area, the average VMT per resident may be 27, for 100 residents this would equate to 2,700 miles traveled. In an urban area, the average VMT per resident may be 5, for 20,000 residents this would equate to 100,000 miles traveled. The County needs to recognize that it is infeasible for rural communities to significantly reduce VMT (without impacting their way of life) or reduce VMT to a level that would make a difference, especially when the County is already carbon negative.

The Humboldt County 2017 General Plan has a mitigation measure that the County develop and implement a Climate Action Plan that effectively mitigates the carbon emissions attributable to this Plan, consistent with the requirements of the state Global Warming Solutions Act and subsequent implementing legislation and regulations. The General Plan shows a daily VMT estimate at project buildout (2040) of only a 6% increase from 2010 daily VMT. The RCAP includes emission estimates through 2045, and as shown above, the County is carbon negative. The County emissions reported in the RCAP are insignificant when compared to the State and do not contribute to the problem.

### **There is too Much Focus on Eliminating Natural Gas**

During power outages and in rural communities, natural gas compliments other energy and heating sources and allows for redundancy and opportunities for more cost effective and redundant power sources.

A simple internet search shows that, although electricity is cheaper for certain appliances, natural gas is generally cheaper than electricity for heating and hot water. Natural gas is an important component to living rurally and forcing electrification could make it more costly for County residents who are already struggling with increasing electricity costs.

According to the US Energy Information Administration (EIA)<sup>3</sup>, natural gas is 25% to 100% cheaper than electricity and the States electricity prices are 56% to 147% higher than the nationwide average.

### **The RCAP Needs to Consider Rural Communities When Designating Infill Areas**

Measures are focused on increasing mixed-use and multifamily development in designated infill areas to alleviate traffic congestion, lower transportation emissions, discourage urban sprawl, and reduce VMT by single passenger vehicles. However, the focus of infill is on urban areas and excludes the County's rural communities. As the RCAP measures are written, new development in rural communities will be difficult and likely lead to increased isolation and further disadvantage the rural areas in the County.

A suggestion - Spot zoning (e.g., multifamily housing and services) for rural communities would likely help provide services that would be obtained with lower transportation requirements.

### **There Has Been Insufficient Outreach to Business Owners, Developers, Property Owners, and County Residents**

The communication to the public has been limited and focused on the procedure for approving an RCAP as well as the potential "catastrophe" to the world if the County doesn't act.

A summary of "how" the RCAP will be implemented and impact the community has not been provided. For example, during the DEIR Public Meeting (March 18, 2025) the entire 728-page DEIR and 308-page RCAP was summarized in 30 minutes, without any details or examples of how implementation will be achieved and how it may affect Business Owners, Developers, Property Owners, and County Residents. In addition, this meeting was advertised as a hybrid, in-person and virtual meeting with directions on how to attend the meeting virtually using Microsoft Teams. However, those that attended virtually could not hear the presentation and those who attended in person could not hear the virtual attendees' comments. County staff provided a recording of the meeting to the public.

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<sup>3</sup> [U.S. Energy Information Administration - EIA - Independent Statistics and Analysis](#)

The same thing happened to the virtual attendees during the Draft RCAP Public Scoping Meeting (September 17, 2024). Virtual attendance was offered via Microsoft Teams and the audio was so bad that the virtual attendees could not really participate. County staff stated that a recording of the meeting would be provided to the public, but a recording has yet to be provided.

The County should focus on better engagement with the community.

### **Regional Climate Committee**

The Regional Climate Committee is a big part of the RCAP. The leadership, organization, funding, and equitable representation is necessary for success of the RCAP.

In order to be fully representative of the County, the committee should include representatives from business, agriculture, forestry, industry, tribes, and landowners. Ranchers, timberland representatives, and gas suppliers to rural areas should not be excluded. Also, the Program Manager should be knowledgeable and experienced in the construction and implementation of power production and distribution facilities.

### **Inadequate Energy Infrastructure**

The DEIR, under Impact UTL-1, states that an *“extensive amount of operational electric power generation and distribution need is not anticipated to be covered by the existing electric power system, and the ongoing improvement and expansion of electrical infrastructure would be required as energy demands increase in Humboldt due to increased electrification of buildings and vehicles under the RCAP”*. The success of the RCAP depends on intense electrification, which will be challenging due to grid capacity limitations in the County. Measures in the RCAP include new ordinances that impose requirements to decarbonize residential and commercial construction.

- What happens if RCEA and PG&E do not meet their 100% renewable energy goals? Will new development be on hold until these goals are met?
- What happens if the grid cannot keep up with the required electrification? If new construction requires all electric or to decarbonize and the infrastructure is not available, will new development be restricted?
- Will the costs to upgrade the electrical infrastructure be passed onto users? Especially when prices are already extremely high?
- The concerns regarding inadequate infrastructure and electrification are amplified in the rural parts of the County. Will rural areas be penalized for lack of infrastructure?

## **Comments on DEIR Impact Summary and Mitigation Measures**

While we have demonstrated that the County is beyond carbon neutral and is climate negative, these comments are solely on the DEIR Mitigation Measures as presented in the DEIR related to implementation of the current draft of the RCAP.

### **Impact AQ-2**

Impact AQ-2 states, *“Implementation of the RCAP would result in the generation of air pollutants during construction of individual projects, which could affect local air quality even with mitigation. Implementation of the proposed plan would not result in a cumulatively considerable net increase of operational criteria pollutants”*.

Operational emissions are not quantified, each new, individual project should quantify their emissions to identify the individual contribution, using software like CalEEMod® or similar, and provide appropriate mitigation measures to reduce the potential impact.

### **Impact AQ-3 – Air Quality**

Impact AQ-3 states, *“Operation of projects facilitated by the RCAP is not expected to expose sensitive receptors to significant operational sources of TACs. During construction of future RCAP projects, emissions of TACs would be reduced through Mitigation Measure AQ-3, and impacts would be less than significant with mitigation”*.

This states that operation is not expected to expose significant operational sources of toxic air contaminants (TACs), however, this should be quantified on a project by project basis for both construction and operation utilizing CalEEMod® or other accepted model. The mitigation measure should include an evaluation/quantification of project operational impacts along with construction impacts .

### **Impact AQ-4 - Odor**

Impact AQ-4 states, *“Projects under the RCAP would not create objectionable odors that could adversely affect a substantial number of people. Impacts related to odors would be less than significant”*.

A mitigation measure should be included that evaluates the operational impacts related to odor. For example, biomass, composting, solid waste measures could have odor impacts and impacts could be significant without mitigation and need to be addressed.

### **Impact AG-1 – Loss of Farmland**

Impact AG-1 states, *“Infrastructure facilitated by the RCAP has the potential to convert Farmland to non-agricultural use and conflict with existing zoning for agricultural use or a Williamson Act contract. Mitigation Measures AG-1 through AG-4 would be implemented to avoid conversion of actively farmed lands and reduce the potential for permanent loss of Farmland to the extent feasible. However, impacts would remain significant and unavoidable”*.

A mitigation measure should be included that requires individual projects to quantify and demonstrate that the project facilitated by the RCAP would result in lesser GHG emissions than natural or working land options.

### **Conclusion**

The County's impact on GHG emissions (or lack thereof) will not correct the "catastrophe" or forestall the effects of climate change as outlined in the RCAP. Although the County may be impacted by climate change, the county is a net sink and is beyond carbon neutral, it is carbon negative. The RCAP should focus on this in order to ensure a fair and equitable approach to climate change mitigation and allow the counties with higher historical contributions to bear the greater responsibility for reducing GHG emissions. The RCAP and GHG thresholds should take advantage of the County's climate positivity and develop measures that allow the County to grow and thrive, while maintaining some level of carbon negativity OR climate neutrality.

The County is not the cause of the problem and should not be penalized for problems caused by the big contributors to GHG emissions. The County should be taking advantage of the credits of being carbon negative and benefit the population of Humboldt County, not punishing it.

The RCAP, CEQA GHG Emissions Thresholds, and Compliance Checklist need to take into account the fact that the County is carbon negative and economically disadvantaged and should have the ability to grow. The economic and development constraints are not necessary within the RCAP, the County is carbon negative without the RCAP in place and is already contributing to the statewide goals. The RCAP should focus on achieving State mandated reductions and actions that allow the County to.

Thank you for the opportunity to comment on the RCAP and DEIR on behalf of our clients, friends, colleagues, and the public.

Sincerely,  
Annje Dodd, PhD, PE and Praj White, PE