

Humboldt County Association of Governments

**Addendum #3 to the Final Environmental Impact Report
prepared for the
Humboldt Regional Transportation Plan
(SCH# 2013102063)**

***Regional Transportation Plan Update 2026
Variety in Rural Options of Mobility
VROOM ☀️2026-2046***



January 2026

Table of Contents

Introduction	1
Purpose of an Addendum to a Certified EIR.....	1
When EIR Addenda Apply.....	1
Purpose of the RTP EIR Addendum	2
Final EIR & RTP Background	3
Program FEIR Background.....	3
Program EIR: Tiered Environmental Assessments.....	4
Project Description: <i>Regional Transportation Plan 2026 Update</i>	5
Impacts Assessment.....	12
Air Quality.....	13
Biological Resources.....	14
Energy	15
Greenhouse Gas Emissions/Climate Change.....	15
Transportation & Circulation.....	18
Tribal Cultural Resources.....	19
Wildfire.....	20
Long-term Effects	21
Conclusion.....	22
References.....	23

INTRODUCTION

All counties in California have a transportation planning agency, officially designated as either a metropolitan planning organization (MPO) or a Regional Transportation Planning Agency (RTPA), based on the county's population. Humboldt County Association of Governments (HCAOG) is Humboldt County's designated RTPA; it is governed, per a joint powers agreement, by the seven incorporated cities and the County of Humboldt.

An RTPA has five core functions (California Transportation Commission, 2024):

1. Maintain a setting for regional decision-making;
2. Prepare an Overall Work Program (OWP);
3. Involve the public in this decision-making;
4. Prepare an Regional Transportation Plan (RTP); and,
5. Develop a Regional Transportation Improvement Program (RTIP) and a list of federally funded or regionally significant projects for inclusion in the FSTIP

HCAOG's RTP, *Variety in Rural Options of Mobility* ("VROOM"), provides a vision and goals for regional transportation investments, integrated with land use strategies, for a 20-year planning horizon. *VROOM 2026-2046* (also called RTP 2026 in this document) updates the previous HCAOG adopted RTPs including in 2013-2014, 2017, and 2021-2022. *VROOM 2026-2046* continues the vision of *VROOM 2022-2042* in addressing the interconnected issues of climate change, land use, safety, and equity in a way that is both tailored to Humboldt County and consistent with the targets set at the state and federal levels. The transportation vision in *VROOM 2026-2046* was crafted in partnership with the community and includes plans to reduce vehicle pollution, promote the development of housing and jobs in walkable neighborhoods near transit, build out a complete network of bike and pedestrian paths, all while maintaining and maximizing the potential of existing transportation investments.

In conjunction with the 2014 RTP update, HCAOG certified the Final Environmental Impact Report (EIR) in July 2014 (State Clearinghouse #2013102063). Two subsequent Addendums were prepared and adopted per the California Environmental Quality Act (CEQA). The 2017 RTP Update and Addendum #1 was prepared and adopted in November 2017 (HCAOG Resolution 17-17) and the 2021 RTP Update and Addendum #2 was prepared and adopted in January 2022 (HCAOG Resolution 22-03). HCAOG has assessed the potential environmental impacts of the 2026 update and has documented the assessment and findings in this Addendum #3 to the Final EIR, per CEQA Guidelines.

PURPOSE OF AN ADDENDUM TO A CERTIFIED EIR

WHEN EIR ADDENDA APPLY

HCAOG is the Lead Agency for adopting the Humboldt County RTP. When a Lead Agency has certified an EIR for a project (or plan) and subsequently the circumstances of the proposed project change, CEQA Guidelines specify when the Lead Agency shall prepare a "subsequent" EIR or an "addendum" to the EIR. Briefly stated, an addendum is appropriate where the changes to the project or plan do not pose a

Section 15162: Subsequent EIRs and Negative Declarations

The CEQA Guidelines Section 15162 states that when an EIR has been certified for a project, no subsequent EIR shall be prepared for that project unless the Lead Agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous EIR or Negative Declaration;
 - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

substantial change to the environmental impacts as analyzed in the previously certified EIR. (Or, more technically, an addendum may be prepared “when a certified EIR has been prepared and some changes or revisions to the project are proposed, or the circumstances surrounding the project have changed, but none of the changes or revisions would result in significant new or substantially more severe environmental impacts” (AEP 2021).)

A subsequent EIR is required, per CEQA Guidelines Section 15162, if changes to the proposed project or project setting would potentially cause “significant environmental effects or a substantial increase in the severity of previously identified significant effects” that were not addressed in the EIR that the Lead Agency certified. (See sidebar for full text of Section 15162.)

If project (or plan) changes will not result in any new or substantially more severe significant effects than were identified in the certified EIR, then, per CEQA Guidelines Section 15164, the Lead Agency or responsible agency shall prepare an addendum to a previously certified EIR. Section 15164 also allows that: “(c) An addendum need not be circulated for public review but can be included in or attached to the Final EIR,” and “(d) The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project” (or plan).

PURPOSE OF THE RTP EIR ADDENDUM

The purpose of this Addendum #3 is to update the *Humboldt Regional Transportation Plan 2013/14 Update – Final Environmental Impact Report* (FEIR; State Clearinghouse #2013102063), *2017 Addendum*, and *2022 Addendum*, based on changes proposed in the 2026 RTP update. This Addendum to the FEIR evaluates the environmental impacts that could result from minor changes in the RTP update’s proposed policies and action plans (or project lists).

The FEIR’s sections were reviewed and updated as appropriate to confirm that no new impacts would occur as a result of implementation of the Regional Transportation Plan, as described in this Addendum.

Conditions of the regional transportation system have not changed substantially since the FEIR was adopted; likewise, the RTP 2026 update proposes policies and actions within the scope and intent as that envisioned in the FEIR. This update increases emphasis on transportation's role in addressing issues of climate change, housing, safety, and equity and establishes greenhouse gas emissions-reduction targets and performance measures into the elements. The proposed RTP update will not result in more significant impacts; neither changes to nor new mitigation measures are required.

The proposed plan, as updated, (1) is not anticipated to result in new significant impacts or a substantial increase in the severity of previously identified significant effects; and (2) would not require major revisions to the previously certified FEIR; therefore, impacts are deemed consistent with those in the FEIR. None of the conditions of Section 15162 have occurred (see sidebar), which would have compelled preparing a subsequent EIR; therefore, this 2026 Addendum to the certified FEIR is consistent with CEQA Guidelines Sections 15162 and 15164.

FINAL EIR & RTP BACKGROUND

PROGRAM FEIR BACKGROUND

HCAOG is updating the 20-year Regional Transportation Plan, *VROOM*, to comply with its four-year update cycle. HCAOG's last RTP update was prepared in 2021-2022. Before adopting the 2021 Update in January 2022, the HCAOG Board adopted an Addendum to the Final Program EIR (State Clearinghouse #2013102063) in January 2022 (HCAOG Resolution 22-03).

For the initial environmental review in 2013-14, HCAOG staff prepared an Initial Study to determine which environmental factors required further analysis in an EIR. The Initial Study (Appendix A of the FEIR), determined that the RTP 2014 would have a less-than-significant adverse impact (or less-than-significant when the identified mitigation measures were incorporated with implementation) on these environmental topics, which therefore did not warrant further analysis in an EIR:

- Aesthetics
- Agricultural Resources
- Cultural Resources
- Hazards and Hazardous Materials
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Utilities and Service Systems

After conducting the Initial Study, HCAOG analyzed these environmental topics in an EIR:

- Air Quality
- Biological Resources
- Environmental Justice
- Geology and Soils
- Greenhouse Gas Emissions
- Hydrology and Water Quality

- Noise
- Transportation/Circulation
- Growth-Inducing Impacts and Irreversible Effects

Similar to the FEIR, the 2017 Addendum (#1) provided additional information on and assessed potential impacts to the following environmental topics:

- Air Quality
- Biological Resources
- Greenhouse Gas Emissions/Climate Change
- Transportation & Circulation
- Long-Term Effects

The 2017 Addendum does not assess Environmental Justice, Geology and Soils, Hydrology and Water Quality, and Noise as there was neither additional information nor substantial changes to project details affecting those topic areas. The 2017 Addendum found that the policies and projects included in the 2017 RTP update were consistent with the original intent of the FEIR and did not induce impacts that were more significant or required additional mitigation measures than what was included in the original FEIR.

The 2022 Addendum (#2) further provided additional information on and assessed potential impacts to the following environmental topics:

- Biological Resources
- Energy
- Greenhouse Gas Emission/Climate Change
- Transportation & Circulation
- Tribal Cultural Resources
- Wildfire
- Long-Term Effects

The 2022 Addendum does not assess Air quality, Environmental Justice, Geology and Soils, Hydrology and Water Quality, Noise, or Irreversible Effects as there was neither additional information nor substantial changes to project details affecting those topic areas. The 2022 Addendum found that the policies and projects included in the 2022 RTP update were consistent with the original intent of the FEIR and did not induce impacts that were more significant or required additional mitigation measures than what was included in the original FEIR.

Program EIR: Tiered Environmental Assessments

Program EIRs serve as part of the “tiering” approach for CEQA analysis. Program EIRs readily apply to RTPs because RTPs are largely policy documents, and the proposed projects listed within are mostly conceptual and will almost always go through additional project-level environmental review. The 2014 FEIR explains its function and potential use as a Program EIR; we reproduce part of that explanation below, revised for the proposed RTP update:

Analysis of site-specific impacts of individual projects is not the intended use of a program EIR. Many specific projects in the RTP 2026 update are not currently defined to the level that would allow for such an analysis. Individual, specific environmental analysis of each project will be undertaken as necessary by the appropriate implementing agency prior to each project being considered for approval at the local level. This program EIR serves as a first-tier environmental

document under CEQA supporting second-tier environmental documents for transportation projects developed during the engineering design process.

Project sponsors implementing transportation projects would undertake future environmental review for projects in the proposed RTP 2026 update. These sponsor (or implementing) agencies would include the cities within Humboldt County as well as Humboldt County, Tribes, Caltrans, and public transit agencies. In sponsoring individual projects, implementing agencies may choose to take advantage of the streamlining benefits of the Program EIR, or to engage in their own environmental review without use or reference to the Program EIR. If they so choose, these agencies would be able to prepare subsequent environmental documents that incorporate by reference the appropriate information from the Program EIR regarding secondary effects, cumulative impacts, broad alternatives, and other relevant factors. If the lead agency finds that implementation of a later activity would have no new effects and that no new mitigation measures would be required, that activity would require no additional CEQA review. Where subsequent environmental review is required, such review would focus on project-specific significant effects (and if necessary project-specific mitigation measures) specific to the project, or its site, that have not been considered in this program EIR (FEIR page 1-7).

The FEIR, 2017 Addendum, 2022 Addendum, and 2026 Addendum include a programmatic review of the Action Plans of each RTP Element, assessing—at the programmatic level—the environmental impacts of projects listed in the RTP. This Addendum reviews only those projects that are newly proposed in the 2026 update; it does not duplicate the FEIR’s, 2017 Addendum’s, or 2021 Addendum’s review. As discussed earlier, the Program FEIR’s and Addendum’s level of analysis is consistent with the conceptual level of the projects in the RTP.

The FEIR programmatically reviewed all projects and policies, some of which could have significant impacts, and identified relevant mitigation measures that could be used by local agencies to mitigate impacts to a less-than-significant level. When the respective implementing agencies move forward on their individual projects (e.g., through actual project design), they will undertake analyzing the potential environmental impacts of each project individually and specifically, as applicable, in order for their own agency’s decision-making body to consider approving the project.

PROJECT DESCRIPTION: *REGIONAL TRANSPORTATION PLAN 2026 UPDATE*

The proposed project is the update of the Regional Transportation Plan (RTP) for Humboldt County, referred to as “VROOM 2026-2046” (for *Variety in Rural Options of Mobility*). The RTP 2026 update serves the same purpose as the previous RTPs for Humboldt County¹ in that (1) it is a long-range planning and programming document aimed at achieving a coordinated and balanced regional transportation system, and (2) HCAOG developed the RTP 2026 consistent with current RTP guidelines (CTC 2024) and pursuant to applicable State and federal laws (Government Code §65080 et seq. of Chapter 2.5, federal legislation; U.S. Code, Title 23, §134 and §135 et seq.). HCAOG adopted the last RTP in January 2022 (also called VROOM).

The Humboldt regional transportation system includes, but is not limited to, transportation network components of the highways, streets, and roadways; public transportation; active transportation including bicycle and pedestrian modes; commuter trails (i.e. as used for transportation); goods movement (ground, air, and marine); aviation facilities, and tribal transportation facilities. VROOM covers

¹ 1998-00, 2000-02, 2002-04 and 2004-06, 2008, 2014, 2017, and 2021.

these modes in distinct elements (chapters) that identify goals, objectives, and policies; assesses needs, and proposes an action plan (short-term and long-term projects). VROOM also covers provisions for land use and transportation connections, emergency transportation coordination, greenhouse gas emissions and related climate-change and sea-level rise impacts, and includes a Tribal Transportation Element, which was prepared in collaboration with the Tribal representatives who are members of the Technical Advisory Committee (TAC). VROOM includes the required Financial Element, which identifies revenue sources (local, state, and federal funding), and projected costs and revenues, noting any projected funding deficits under both constrained and unconstrained project scenarios. In 2021, the Renewing Our Communities chapter was added to describe how transportation investment and policy choices affect community health, safety, equity, land use patterns and climate outcomes. This element grounds the RTP's transportation strategies in community values and lives experience by providing demographic information, regional context, policy framework, and performance targets that guide how the transportation system should evolve to better support resilient, inclusive, and livable communities.

The overall goal and main objectives as described in the 2014 FEIR follows:

The plan's overall goal is for Humboldt County to have a comprehensive, coordinated and balanced multi-modal transportation system, so that people in the region can travel and move goods safely and efficiently by the modes that best suit the individual and society at large. HCAOG's overall objective is to program all funds based on multi-modal transportation goals and objectives, and needs and priorities as established in the Regional Transportation Plan. HCAOG decides how to program transportation funds based on multi-modal goals and objectives, and needs and priorities as established in the RTP. The RTP's policies and proposed projects pursue six main objectives/planning priorities (in alphabetical order), which the RTP applies to each mode:

- Balanced Mode Share/Complete Streets
- Economic Vitality
- Efficient & Viable Transportation System
- Environmental Stewardship
- Equitable & Sustainable Use of Resources
- Safety

The *VROOM 2026-2046* overall goal and objectives remain the same from the 2021 Update (HCAOG 2026):

Overall Goal: HCAOG's goal is for Humboldt County to have a carbon-neutral, multi-modal transportation system that is comprehensive, safe, sustainable, and equitable so that people in the region can travel and move goods by the modes that best suit the individual or business/industry, and society at large.

Overall Objective: Program all transportation funds based on multi-modal transportation goals and objectives, and needs and priorities as established in the Regional Transportation Plan. HCAOG will pursue six main objectives/planning priorities. The objectives support one another and will apply to each transportation mode, framing each mode's policies. In alphabetical order, the objectives are:

- Active Transportation Mode Share/ Complete Streets – Increase multi-modal mobility, balance mode shares, and/or access. Mobility means having travel choices (for people and goods) with predictable trip times. A balanced mode share means all transportation modes are available in proportion to their efficiency and short-term and long-term costs and benefits. Increased access means more options for people to reach the goods, services, and activities they need.

- Economic Vitality – Support the local or regional economy by improving goods movement and transportation access, efficiency, and cost-effectiveness; by enhancing economic attractors (e.g. via walkable streets, multiuse trails, transit service, freight access, shared mobility services); and by indirectly cutting health care costs due to more active transportation or less transportation-related pollution, and by reducing consumption of foreign oil.
- Efficient & Viable Transportation System – Make the transportation system operate more efficiently, such as by increasing multimodal connectivity, increasing opportunities for short trips made via walking or biking, reducing traffic congestion, and using Intelligent Transportation System (ITS) management (e.g. Greater Eureka Area Travel Demand Model, Street Saver, GPS tracking on transit buses, other management programs). Make the system more financially and operationally viable such as by prioritizing cost-effective investments, including climate-change and sea-level-rise adaptation and resiliency in planning and design, pursuing stable funding, and preserving transportation assets to maximize resources and future use.
- Environmental Stewardship & Climate Protection – Enhance the performance of the transportation system while protecting and enhancing the natural environment. Strive to achieve goals of California Global Warming Solutions Act of 2006 (AB 32) and Sustainable Communities and Climate Protection Act of 2008 (SB 375), protect and improve air, water, and land quality, help reduce transportation-related fuel and energy use, help reduce single-occupancy-vehicle (SOV) trips and motorized vehicle miles traveled (VMT), etc.
- Equitable & Sustainable Use of Resources – Advocate for costs and benefits (financial, environmental, health, and social) to be shared fairly. Prioritize projects based on cost effectiveness as well as need and equity for underserved populations. Coordinate transportation systems with land use for efficient, sustainable use of resources and minimize the consumption and use of finite resources such as fossil fuels.
- Safety and Health – Increase safety especially for the most vulnerable users (elderly, youth, pedestrians, bicyclists, people with disabilities). Advocate the health benefits of active transportation. Advocate for Vision Zero resolutions to reduce traffic-related fatalities and serious injuries to zero.

2026 Updates

The *VROOM 2026-2046* update focuses on refreshing information that is out of date and does not introduce new elements. The major changes to the 2026 Update consist of additional details pointing to changes to policies or projects, particularly updated demographics data and community feedback in the “Renewing Our Communities” element. Many revisions were from staff recommendations or from guidance from the TAC and Social Services Technical Advisory Council (SSTAC). *VROOM 2026-2046* new/updated policies and projects are summarized/listed below.

1. Introduction

- Emphasized continuity with *VROOM 2022*; highlighting traffic safety and maintenance of existing infrastructure.
- Updated section on HCAOG accomplishments since the last RTP and completed local and regional projects.
- Minor updates to consistency with other plans, including reference to Humboldt County Climate Action Plan.

2. Renewing Our Communities

- Updated demographic data tables and discussion.

- Summary of results from public outreach/engagement program.
- Safe and Sustainable Targets (SST) are refined in this RTP to be more efficient in tracking and aligned with other key objectives.

Summary of Updates to Table Renew-3 Safe and Sustainable Transportation Targets²

Performance Measure	Regional Target(s)
Percent Mode Shift	<p>Addition of recommended metrics to quantify mode shift.</p> <p>~ # of transit boardings and trips</p> <p>~ non-motorized user counts on critical commuter pathways (i.e. Humboldt Bay trail)</p>
Zero-Emission Vehicle Infrastructure	<ul style="list-style-type: none"> • Removal of targets that have been completed: ZEV (i) and (ii). • Extension of timelines for ZEV infrastructure charging goal ZEV (iii) Fueling Infrastructure: <ul style="list-style-type: none"> • By 202530, install a total of 1,394 <u>2,941</u> public chargers, including 42 <u>124</u> DC Fast Chargers (DCFC). • By 203035, install a total of 3,560 <u>7,399</u> EVCS of which 127 <u>349</u> are DCFC... <p>(Updated)</p>
Percentage of Zero-Emission School Buses & Public Fleet Vehicles	<ul style="list-style-type: none"> • Removal of school buses from ZEV transition. • Revision of fleet transition goals to reflect consistency with 1) HTA current fleet transition plans and 2) the California Clean Fleets Rule.
Efficiency & Practicality in Locating New Housing	<ul style="list-style-type: none"> • Removal of completed target: Efficiency in New Housing (ii). iv) Starting by 2022, new housing <u>development patterns</u> contribute to a countywide reduction in per capita VMT from cars. (Updated) v) By 2023/24<u>27/28</u>, all jurisdictions have adopted GP/zoning incentives for building in “highly connected” areas and for other climate-friendly housing-development. (Updated)
Active Transportation Education	<ul style="list-style-type: none"> • Removed per TAC recommendation.
Invest in Complete Streets	<ul style="list-style-type: none"> • Extended deadline and added complete streets to discretionary funding goal. i) Increase by 10% by 202328, and by 25% by 202832, regional discretionary funding set aside for permanent infrastructure, pop-ups, pilots, or other projects for <u>complete streets</u> or active transportation projects. (Updated)

3. Global Climate Change

- Updated synopsis of global climate change impacts.
- Updates to IPCC findings; state reports such as Statewide Climate Adaptation 2024; and countywide greenhouse gas emissions.

² RTP 2026 Update, Chapter 2 – Renewing Our Communities: Table Renew-3 Safe and Sustainable Transportation Targets.

4. Tribal Transportation

- Removed Policy Tribal-2 because state legislation (Ramos 2023) addressed the issue of waiving sovereign immunity in transportation contracts.

5. Emergency Transportation

- Revised narrative to recommend caution pursuing voluntary disaster registries based on state OES guidance.
- Revised proposed project to be more actionable with regard to planning output. Concept is to partner with emergency planners to lead emergency evacuation planning for access and functional need (AFN) population, primarily through the SSTAC.

6. Land Use - Transportation

- Updated with new regional housing need determination and allocation methodology.
- Removed background on California housing legislation, as housing laws are too numerous and frequent to be tracked within the RTP.

7. Complete Streets and Connected Communities

- Table *Streets-4* Complete Streets Projects – added 30% costs for projects being carried over. See Table 1 below for new complete streets projects
- Completed projects were highlighted.
- Referenced the 2024 Complete Streets Bill which added transparency and accountability to how Caltrans implements its own Complete Street policy, including an increased focus on transit.

POLICY STREETS-2

- ~~**Humboldt Bay Trail Regional trail maintenance:** HCAOG recognizes the Humboldt Bay Trail, and planned and envisioned extensions, as a regional priority multi-use trail, and supports multi-jurisdictional, public, and private efforts to develop and maintain it the regional trail network.~~ Humboldt Bay Trail Regional trail maintenance: HCAOG recognizes the Humboldt Bay Trail, and planned and envisioned extensions, as a regional priority multi-use trail, and supports multi-jurisdictional, public, and private efforts to develop and maintain it the regional trail network. *(Update)*

8. Commuter Trails

- Updates to trail work including completion of Humboldt Bay Trail.
- Added Samoa to Arcata trail along Great Redwood Trail Agency to Table Trails-1

9. Public Transportation

- Added major transit stops (in addition to those previously added by resolution to the RTP in 2024).
- Removed out of date information and historic background information.
- Added information on new transit systems (RCX, microtransit).
- Updated planning references, needs, and TDP recommended projects.
- Small addition to policy Transit-4 to acknowledge the role of the SSTAC in administration of Measure O transit funds.

POLICY TRANSIT-4 Local funding for expansion

- HCAOG will help develop local funding sources to afford expanding service to meet demand and through its committees provide a forum to advise on the use of local funds for transit. *(Update)*

POLICY TRANSIT-9 Zero-emission fleets

- HCAOG supports transitioning transit fleets to alternative fuels that will meet zero-emission bus (ZEB) standards. HCAOG will assist agencies in planning for ZEB rollout and in identifying funding for capital improvements necessary to support infrastructure for alternative fuels as well as operational funding for increased fueling costs. (Update)

10. Aviation System

- Updated projects that have been completed.

11. Goods Movement

- Minor updates.

12. Financial

- Incorporated Infrastructure Investment and Jobs Act (IIJA) legislation into federal highway section.
- Added Measure O revenue to tables.
- Adjusted assumption of inflation costs from 2% to 2.5%.
- Edits to Complete Streets finances to reflect current program funding.
- Pending final updates to Complete Streets funding tallies.
- Addition of new transit funding like TIRCP and SB125.
- Minor adjustments to Goods Movement and Aviation financing.
- Proposed change in policy: removed project to complete a funding consistency analysis, and instead added policy for “Grant Leveraging with Discretionary Funds” (page 12-16)

POLICY FINANCE- 1 Grant Leveraging with Discretionary Funds

- HCAOG recognizes the importance of grant funding to deliver the transportation goals of the RTP. HCAOG will seek to set aside funds in future discretionary funding cycles (i.e. the STIP) to be used for leveraging grant funds for each agency’s priority project, as designated by the agency in the most recent version of the RTP. HCAOG staff will create a process recommended by the TAC and approved by the HCAOG Board to enact said policy. (Update)

Projects

The RTP 2026 Update’s proposed regional projects that are new from the RTP 2013/14 Update, 2017 Update, and 2022 Update are listed below in the following table:

Table *Projects-1* lists new regional projects for highways, streets, and roads (for driving, bicycling, and walking modes) that are proposed in the Complete Streets Element.

Table *Projects-2* lists updated regional projects for regional emergency transportation that are proposed in the Emergency Transportation Element.

There are no new projects proposed for the Action Plans of the Global Climate Change Element, Tribal Transportation Element, Commuter Trails Element, Public Transportation Element, Aviation System Element, or Goods Movement Element. Further, as noted previously and in the 2014 FEIR (Section 2.0), the Program EIR analysis does not apply to projects for which funding is not programmed through HCAOG, including Caltrans or Harbor District related projects.

Table *Projects-1* New Complete Streets Projects Proposed in the 2026 RTP Update

Jurisdiction	Location	Project Description
Arcata	US 101, US 255 and US 299	Reconnect Arcata Project - this is divided by three major highways US 101, US 255 and US 299.

Jurisdiction	Location	Project Description
Arcata	Alliance Road from 12th Street to Foster Avenue	Rehabilitation, pedestrian-bicycle, traffic calming improvement
Blue Lake	G Street, from First Avenue to Second Avenue	Rehab and reconstruct with pedestrian improvements and traffic calming elements
Blue Lake	2nd Avenue Pedestrian Bridge Replacement (G street – H Street)	Replacement of existing pedestrian bridge
County	Hiller Road / Hwy 101	On and off ramp
Eureka	Washington/8th Street from Broadway to P Street	Bike Boulevard, traffic circles, pedestrian improvements, road rehabilitation
Eureka	Russ Street, Dolbeer, T Street	Shared-use path bicycle/pedestrian suspended bridge
Eureka	M Street Bike Boulevard	Bike Boulevard, traffic circles, pedestrian improvements and road rehab and pedestrian improvements
Eureka	Hawthorn/Humboldt	Bike Boulevard, traffic circles, pedestrian improvements and road rehab
Eureka	3rd Street	Bike Boulevard, traffic circles, pedestrian improvements and road rehab
Eureka	Henderson Street and Harris Street	Road rehabilitation, ADA, bicycle facility, bike lane enhancements
Eureka	Russ Street, P Street, Hodgson Street, Glatt Street	Bike Boulevard, pedestrian improvements, traffic circle and road rehab
Eureka	1st Street – C Street to J Street	Class I trail
Eureka	Myrtle and West	Pedestrian and bicycle infrastructure improvement, traffic circle
Ferndale	Francis Street - Ocean Avenue to Ferndale Public Works Building	Roadway rehabilitation
Ferndale	Berding Street - Herbert Street to Eugene	Roadway rehabilitation
Ferndale	Shaw Ave., Main Street to Berding Street	Roadway rehabilitation and reconstruction, sidewalk improvements, including ADA
Ferndale	Francis Street, Between Francis Creek & Eugene Street	Roadway rehabilitation, sidewalk improvements, including ADA
Ferndale	Ocean Ave., from Main St. to just beyond Portuguese Hall	Roadway rehabilitation and ADA improvements
Ferndale	Intersection 5th Street at Ocean Ave.	Roadway rehabilitation
Ferndale	Rose Ave., McKinley Ave. to City Boundary	Roadway rehabilitation
Ferndale	Van Ness Ave at Main Street	Roadway rehabilitation
Rio Dell	Bellevue Avenue, Davis Street	Improve sidewalk, ADA crossings and curb ramps, and crosswalks.
Trinidad	Scenic Drive	Rehabilitation
Trinidad	Edwards Street – Galindo Street to Hector Street	Sidewalks, driveways and curb ramps
Trinidad	US 101 – Main Street Interchange	Intersection improvements

Table *Projects-2* Updated Regional Projects for Regional Emergency Transportation Proposed in the 2026 RTP Update

Agency	Location	Project Description
HCAOG, SSTAC, in coordination	Countywide	Take a lead coordinating role to develop and adopt a regional evacuation coordination framework consistent with existing regional and state emergency operations plans and practices. The framework would clarify roles and

Agency	Location	Project Description
with Humboldt OES, HTA, Caltrans D1, and local/tribal partners		formalize agreements between transit/paratransit providers, emergency management, and human-services agencies. It will establish standard operating procedures for information-sharing between EOCs and transit dispatch centers, set policies for meeting evacuation transportation needs for the Access and Functional Needs population, and implement training exercises. The Plan should aim to be adopted as an AFN Annex to the County EOP.

IMPACTS ASSESSMENT

As summarized above, the 2026 RTP Update focused on improving technical accuracy, policy clarity, implementation feasibility, and consistency with current state guidance, funding programs, and local and regional planning efforts. New data included updated demographics, public outreach results, revised financial assumptions, and Humboldt RCAP information. Other changes include refined Safe and Sustainable Targets in the Renewing Our Communities chapter, updated climate change language and data, revised policies (for tribal, emergency, land use, transit, and complete streets elements), incorporation of new legislation, funding programs, and completed projects. The RTP 2026 Update builds on the 2021 Update’s emphasis on transportation’s role in addressing issues of climate change, housing, safety, and equity and establishes greenhouse gas emissions-reduction targets and performance measures into the elements. The Action Plans consist of project lists provided by each HCAOG member entity and Technical Advisory Committee members and the Humboldt Bay Harbor, Recreation & Conservation District. The project lists are similar to those in the 2017 and 2021 RTP and, project lists for some jurisdictions did not change at all. The proposed projects and funding cover the same transportation modes as in the previous RTP.

This Addendum to the FEIR assesses potential impacts based on the incremental change due to the new policies and projects proposed in the 2026 Update compared to the policies and projects proposed in the 2014 RTP that were already analyzed in the FEIR, the 2017 Update that were analyzed in the 2017 Addendum, as well as to the 2021 Update that were analyzed in the 2022 Addendum.

For the proposed project, the RTP 2026 Update, the existing analysis contained in the FEIR environmental checklist (Appendix A of the FEIR) continues to adequately address the environmental factors for these ten environmental factors: **aesthetics, agricultural resources, cultural resources, hazards and hazardous materials, land use and planning, mineral resources, population and housing, public services, recreation, and utilities and service systems**. As discussed in the FEIR, the HCAOG Board determined that the RTP posed either no adverse impact, a less-than-significant adverse environmental impact, or a potentially significant environmental impact that was reduced to less-than-significant when the identified mitigation measures were incorporated with implementation.

Because the minor changes in the proposed RTP 2026 Update:

- 1) have not changed the nature or scale of the Regional Transportation Plan;
- 2) will not result in new or substantially more severe significant environmental effects; and
- 3) are not proposed under environmental conditions or circumstances substantially changed from those analyzed and addressed in the FEIR;

no additional analysis or discussion of these topics is required. The determinations for these environmental factors is the same as concluded in the FEIR: With the FEIR mitigation and monitoring

program incorporated, the proposed RTP 2026 Update will have a less-than-significant adverse environmental impact in these ten environmental factors.

The FEIR analyzes the environmental factors for air quality, biological resources, environmental justice, geology and soils, greenhouse gas emissions, hydrology and water quality, noise, and transportation/circulation, plus growth-inducing impacts and irreversible effects. Since the FEIR was certified in 2014, and the RTP subsequently adopted, there has been no substantial evidence that substantial changes have occurred to these baseline environmental conditions either on or near the proposed project sites. Some changes, of course, have occurred; for example, the State legislature has passed new related laws, and HCAOG members have adopted new plans. However, because these changes do not directly affect either the program-level environmental analysis and/or do not apply to the local or regional level, the changes are deemed “minor” as they relate to comparing conditions now to conditions discussed in the 2014 FEIR, 2017 Addendum, and 2021 Addendum. Additionally, changes and additions identified in the 2026 RTP Update would not result in new or substantially increased impacts and fall within the range, severity, magnitude, duration, geographic scope, and programmatic nature of impacts already identified in the previously certified FEIR. No substantial physical impacts to the environment beyond those already anticipated and documented in the FEIR are anticipated to result from the changes and additions identified the 2026 Update.

Because the nature and scope of the projects proposed in the RTP 2026 update has not significantly changed from the 2014 Update, and because the conditions discussed in the 2014 FEIR have not substantially changed for **environmental justice, geology and soils, hydrology and water quality, noise, or irreversible effects**, no further environmental assessment is required. Likewise, there is no substantial evidence of substantial changes to **air quality, biological resources, energy, greenhouse gas emission and climate change, tribal cultural resources, transportation/circulation, wildfire, or long-term effects**, but below we summarize pertinent updates that have occurred in the past four years in order to reflect current conditions including changes to local, state, and federal regulations, and changes to environmental data.

AIR QUALITY

The proposed changes to the RTP 2026 Update are not expected to result in any new or substantial increases in the severity of impacts to air quality beyond those already identified in the previously certified FEIR. Humboldt County is within the North Coast Air Basin and falls under the management of the North Coast Unified Air Quality Management District (NCUAQMD). NCUAQMD is listed as ‘attainment’ or ‘unclassified’ for all the federal and State ambient air quality standards except for the State 24-hour standard for PM10. There is one revision to the Current Federal and State Ambient Air Quality Standards FEIR table since the 2017 Addendum, as shown below.

Table Air-1 Current Federal and State Ambient Air Quality Standards*

Pollutant	Federal Standard*	California Standard*
Ozone	0.070 ppm (8-hr avg)	0.09 ppm (1-hr avg) 0.07 ppm (8-hr avg)
Carbon Monoxide	35.0 ppm (1-hr avg) 9.0 ppm (8-hr avg)	20.0 ppm (1-hr avg) 9.0 ppm (8-hr avg)
Nitrogen Dioxide	0.10 ppm (1-hr avg) 0.053 ppm (annual avg)	0.18 ppm (1-hr avg) 0.030 ppm (annual avg)
Sulfur Dioxide	0.075 ppm (1-hr avg)	0.25 ppm (1-hr avg)

	0.14 ppm (24-hr avg)	0.04 ppm (24-hr avg)
Lead	0.15 µg/m ³ (rolling 3-month avg)	<u>1.5 µg/m³ (30-day avg)</u>
Particulate Matter (PM10)	150 µg/m ³ (24-hr avg)	50 µg/m ³ (24-hr avg) 20 µg/m ³ (annual avg)
Particulate Matter (PM2.5)	35 µg/m ³ (24-hr avg) 12 µg/m³ (annual avg)	12 µg/m ³ (annual avg) <u>9 µg/m³ (annual avg)</u>

*Strike-outs and underlined text show updates to the original table (2014 FEIR) and Addendums.

ppm= parts per million, µg/m³ = micrograms per cubic meter

Source: California Air Resources Board (7/16/24), https://ww2.arb.ca.gov/sites/default/files/2024-08/AAQS%20Table_ADA_FINAL_07222024.pdf, Jan. 7, 2025.

The FEIR includes mitigation measures, including project-level mitigation measures that can and should be considered and implemented by lead agencies for subsequent, site-specific environmental review, as appropriate and feasible. The analysis in the previously certified FEIR “Air Quality” section adequately addresses the range of air quality impacts that could result from the RTP 2026 Update at the program level. Thus, incorporation of the proposed changes would not result in any new significant air quality impacts or substantially increase the severity of air quality impacts beyond those programmatically addressed in the FEIR.

The minor changes in the proposed RTP 2026 update:

- 1) have not changed the nature or scale of the Regional Transportation Plan;
- 2) will not result in new or substantially more severe significant environmental effects; and
- 3) are not proposed under environmental conditions or circumstances substantially changed from those analyzed and addressed in the FEIR;

therefore, no additional analysis or discussion of these topics is required. **The determinations for air quality environmental factors are the same as stated in the FEIR.**

BIOLOGICAL RESOURCES

The proposed 2026 RTP updates are not expected to result in any new or a substantial increase in the severity of significant impacts on biological resources beyond those already identified in the previously certified FEIR. The FEIR includes mitigation measures, including project-level mitigation measures that can and should be considered and implemented by lead agencies for subsequent, site-specific environmental review, as appropriate and feasible. The analysis in the previously certified FEIR “Biological Resources” section adequately addresses the range of biological impacts that could result from the RTP 2026 Update at the program level. Thus, incorporation of the proposed changes would not result in any new significant biological resource impacts or substantially increase the severity of biological resource impacts beyond those programmatically addressed in the FEIR.

The minor changes in the proposed RTP 2026 update:

- 1) have not changed the nature or scale of the Regional Transportation Plan;
- 2) will not result in new or substantially more severe significant environmental effects; and
- 3) are not proposed under environmental conditions or circumstances substantially changed from those analyzed and addressed in the FEIR;

therefore, no additional analysis or discussion of these topics is required. **The determinations for environmental factors for biological resources are the same as stated in the FEIR.**

ENERGY

The use of energy, particularly as it relates to greenhouse gas emissions, was discussed in portions of the 2013/14 FEIR and energy was directly discussed as a separate resource in the 2022 Addendum. Potential impacts related to energy resources were determined to be less than significant and not require any additional mitigation. The proposed 2026 RTP updates are not expected to result in any new or substantial increases in the severity of impacts to energy beyond those already described in the previously certified FEIR and Addendums.

One of the primary goals of the 2026 RTP Update is to incorporate the most current and relevant data while continuing to reduce greenhouse gas emissions from the transportation sector and support a mode shift to walking, bicycling, and public transit. To support these objectives, the 2026 Update refined the Safe and Sustainable Transportation Targets (SSTs) to improve tracking efficiency and alignment with other key regional and state goals.

One regional performance target achieved since the 2021 RTP is completion of a Zero-Emission Vehicle Charging Sites Evaluation Plan. The plan identifies priority locations for public charging infrastructure using a phased approach at the community, neighborhood, and station levels, with an emphasis on equity. In addition, the region has met the established policy target for 100% of local jurisdictions adopting electric vehicle supportive building codes and electrical upgrade requirements. As of 2025, Humboldt County had a total of 311 public charging stations (231 Level 2 and 80 DC fast charging stations) along with 17 Level 2 shared private ports. This represents an increase of 177 public charging ports since RTP 2021. Local transit agencies, including Humboldt Transit Authority (HTA) and A&MRTS, have deployed battery electric buses in their fleet. HTA is also primarily pursuing a hydrogen fuel-cell strategy, with one hydrogen fuel-cell bus already in operation, additional vehicles on order, and a hydrogen fueling station being permitted and constructed at the transit yard to support fleet transition.

Based on the above analysis the changes in the proposed RTP 2026 update:

- 1) have not changed the nature or scale of the Regional Transportation Plan;
- 2) will not result in new or substantially more severe significant environmental effects; and
- 3) are not proposed under environmental conditions or circumstances substantially changed from those analyzed and addressed in the FEIR;

therefore, no additional analysis or discussion of these topics is required. **The determinations related to energy resources are the same as stated in the FEIR and 2022 Addendum.**

GREENHOUSE GAS EMISSIONS/CLIMATE CHANGE

Governor Jerry Brown, in 2015, established a California target to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030 (Executive Order B-30-15, April 29, 2015). Then, in September 2016, Governor Brown signed Senate Bill 32 (Pavley) and Assembly Bill 197 (Garcia), which codified the 2030 target. The target is a mid-target for the State reaching the ultimate goal of the California Global Warming Solutions Act of 2006 (AB 32), which is to reduce emissions to 80 percent below 1990 levels by 2050. Subsequent state policy has updated the long-term framework from a 2050 emissions reduction benchmark to a goal of achieving carbon neutrality no later than 2045. The state was able to reach its target of returning to 1990 emission levels four years earlier than mandated and is implementing strategies identified in the 2022 Climate Change Scoping Plan Update to further reduce greenhouse gas emissions (CARB, 2022).

Two different pieces of legislation were adopted in 2018 that furthered California’s commitment to reducing GHGs. Senate Bill 100 (De León) established a state goal of 100% clean electricity goal by 2045 and advanced the Renewables Portfolio Standard to 50% by 2025 and 60% by 2030. Then Executive Order B-55-18 directed the state to achieve carbon neutrality no later than 2045 and achieve and maintain net negative emissions thereafter.

To comply with California’s climate bills and executive orders, State agencies must take climate change into account for planning and investment decisions. Foremost among State agencies, the California Air Resources Board (CARB) must develop strategies to reduce GHG emissions, which are most recently detailed in the 2022 Climate Change Scoping Plan, outlining a comprehensive pathway to meet the 2030 emissions reduction target and achieve carbon neutrality by 2045.

The California Transportation Commission (CTC) adopted a new set of RTP Guidelines in January 2024, which included separate guidance for both Metropolitan Planning Organizations (MPOs) and RTPAs. Consistent with evolving state climate policy, *the 2024 RTP Guidelines for RTPAs* reiterate that transportation planning should integrate climate mitigation and adaptation considerations and build on policy framework established in previous guidelines.

In the *2017 RTP Guidelines for RTPAs*, and highlighted in Addendum #2, State agencies were given the following principals as guidance:

- Give priority to actions that both build climate preparedness and reduce GHG emissions;
- Where possible, take flexible and adaptive approaches to prepare for uncertain climate impacts;
- Actions should protect the state’s most vulnerable populations; and,
- Prioritize natural infrastructure solutions (e.g., flood plain and wetlands restoration or preservation, combining levees with restored natural systems to reduce flood risk, and urban tree planning to reduce high heat days) (as defined in Public resources code 71154(c)(3)).

State agencies were also directed employ full life-cycle cost accounting to evaluate and compare infrastructure investments and alternatives. The *2024 RTP Guidelines for RTPAs* retain these core concepts while expanding and updating guidance to reflect more recent state climate, equity, and resilience policies.

The “*California Greenhouse Gas Inventory 2000-2022: Trends of Emissions and Other Indicators*” 2024 edition, offers updated data from what was available in 2014, 2017, and 2021 (CARB, 2024). In it, CARB reports:

- The transportation sector remained the largest source of statewide GHG emissions in 2022 at approximately 37.7% of total emissions and transportation emissions declined by 5.2 MMTCO₂e (3.6%) from 2021 to 2022. When upstream emissions from fuel production and refining are included, transportation-related activities accounted for approximately 48% of statewide emissions in 2022.
- Emissions from the electric power sector accounted for approximately 16.1% of statewide GHG emissions in 2022 and declined by 2.6 MMTCO₂e (4.1%) compared to 2021.
- The industrial sector contributed approximately 19.6% of statewide GHG emissions in 2022 and experienced a 2.0% decrease from 2021, reaching the lowest emissions level observed across the inventory time series. This was primarily due to declines in oil and gas production and processing activities

- Emissions from the commercial and residential sector accounted for approximately 10.6% of statewide emissions and increased slightly between 2021 and 2022.
- Agricultural activities accounted for approximately 8.0% of statewide emissions in 2022, a decrease of approximately 0.5 million metric tons of CO₂e (1.7%) compared to 2021.
- Emissions from high global warming potential gases as well as the recycling and waste sector have remained relatively constant in recent years.

The Intergovernmental Panel on Climate Change's (IPCC's) *Sixth Assessment Report*, which consists of several related reports and studies published from 2021-2023, provides updated projected changes in the global climate system according to varying levels of future GHG emission scenarios. The *2023 Synthesis Report* shows that while the overall range of projected temperature increases it is generally consistent with earlier assessments referenced in the 2014 FEIR (which was based on a 2007 IPCC report).

Other summary points from the *2023 IPCC Sixth Assessment Synthesis Report* are:

- It is unequivocal that human influence has warmed the atmosphere, ocean and land. Widespread and rapid changes in the atmosphere, ocean, cryosphere and biosphere have occurred.
- Global mean surface temperature reached approximately 1.1°C above 1850–1900 levels during 2011–2020, with warming occurring faster since 1970 than during any other 50-year period over at least the last 2,000 years (high confidence).
- Widespread and increasingly irreversible impacts have been observed in terrestrial, freshwater, coastal, and marine ecosystems, including species range shifts, mass mortality events, glacier retreat, and permafrost thaw (high to very high confidence).
- Global mean sea level rose by approximately 0.20 meters between 1901 and 2018, with the rate of rise accelerating in recent decades, primarily driven by human-induced climate change (high confidence).
- The frequency and intensity of hot extremes have increased across most land regions since the 1950s, while cold extremes have become less frequent and less severe, with human influence identified as the primary driver (high confidence).
- Climate change is already contributing to adverse impacts on human health, food security, water availability, infrastructure, and livelihoods, with disproportionate effects on vulnerable populations and communities that have contributed the least to global emissions (high confidence).
- Without deep, rapid, and sustained greenhouse gas emissions reductions this decade, global warming is projected to exceed 1.5°C during the 21st century, increasing the likelihood of severe, widespread, and irreversible impacts (high confidence).

The 2014 FEIR, 2017 Addendum, and 2022 Addendum summarize regional planning efforts related to climate change. Other recent local planning include, but are not limited to:

- The Humboldt Regional Climate Action Plan (RCAP) was adopted in December 2025. This countywide climate framework that sets 2030 and 2045 emissions reduction goals aligned with California law, defines 29–30 detailed measures across key sectors to reduce emissions, establishes a collaborative regional implementation structure, and includes adopted CEQA GHG emissions thresholds for evaluating future projects.
- In April 2022 the California Natural Resources Agency released the Natural and Working Lands Climate Smart Strategy which includes a North Coast regional profile covering Humboldt County. This strategy identified region-specific climate risks, including rising temperatures, increased

precipitation variability, declining snowpack, accelerated sea-level rise due to land subsidence in Humboldt Bay, increased wildfire risk, and shifting habitats.

- Since CAPTI’s adoption in 2021 their annual implementation reports indicate that all 34 original CAPTI actions were fully implemented as of July 2024. In February 2025, CalSTA released CAPTI 2.0, an updated plan that builds on the original framework by adding four new strategies and 14 new actions. These are intended to accelerate and deepen the state’s alignment of transportation investment with climate, equity, mode shift, and vehicle miles traveled (VMT) reduction goals.

The FEIR discusses that the 2014 RTP would reduce per capita GHG emissions from 2013 by 14 percent, and that the full set of projects and policies are designed to align transportation planning to reduce VMT and transportation-related GHG emissions. The 2017 Update included a new element titled “Global Climate Crisis” which had separate goals and policies related to reducing transportation related climate impacts. In this 2026 Update, the terminology was changed to “Global Climate Change” to use more conventional language.

As touched on in the Energy section of this addendum, the 2026 Update refined the SST Targets to improve measurability, reflect completed actions, and align regional goals with current implementation realities and state policy. Updates include the addition of recommended metrics to better quantify mode shift outcomes, and the removal of targets that have already been achieved, including selected zero-emission vehicle (ZEV) infrastructure and residential energy efficiency targets. Several target timelines were extended, including those related to ZEV charging infrastructure, housing access, and general plan zoning, to acknowledge implementation challenges and align expectations with current progress. Additional refinements were made to better reflect agency operations and state requirements.

As noted above, some changes with respect to circumstances have occurred since the FEIR including County adoption of the Regional Climate Action Plan that includes detailed measures to reduce emissions, establishes a collaborative regional implementation structure, and includes adopted CEQA GHG emissions thresholds for evaluating future projects. The 2026 RTP Update also proposes minor updates to target timelines. However, these changes in circumstances would be expected to fall within the range, severity, magnitude, duration, geographic scope, and programmatic nature of regional impacts on greenhouse gas emissions and analysis of GHG emissions as previously identified in the FEIR. Furthermore, the 2026 RTP update would result in the same GHG reduction trajectory as the prior updates and would not conflict with the region’s or state’s long term GHG emission reduction goals.

The changes in the proposed RTP 2026 Update:

- 1) have not changed the nature or scale of the Regional Transportation Plan;
- 2) will not result in new or substantially more severe significant environmental effects; and
- 3) are not proposed under environmental conditions or circumstances substantially changed from those analyzed and addressed in the FEIR;

therefore, no additional analysis or discussion of these topics is required. **The determinations for GHG emissions/climate change environmental factors are the same as stated in the FEIR.**

TRANSPORTATION & CIRCULATION

The proposed 2026 RTP updates are not expected to result in any new or a substantial increase in the severity of significant impacts to transportation and circulation beyond those already identified in the previously certified FEIR. As noted in the 2017 and 2022 Addendums, the criteria for analyzing

transportation impacts, as it relates to complying with CEQA, has gone through major shifts on account of the passage, in September 2013, of Senate Bill 743 (Steinberg). This legislation mandates that a proposed project's impact on auto delay, level of service (LOS), or similar measures of vehicular capacity or traffic congestion, cannot be a basis for determining a significant adverse impact (nor can parking capacity be a basis for adverse impacts within infill areas where frequent transit service is provided nearby). As such, CEQA analysis can no longer be based on LOS but instead must consider vehicle miles traveled (VMT).

In anticipation of updated legislation regarding transportation impacts, in the 2014 FEIR, HCAOG veered away from LOS and used VMT, per capita VMT, and vehicle hours travelled (VHT) as the performance indicators to determine potential impacts to the overall regional transportation system. This was consistent with the performance indicators established by the RTP 2013/14 Update, which have remained the same in the RTP 2026 Update. Additionally, the FEIR used the criteria for determining transportation and circulation impacts based in part on the CEQA Guidelines environmental checklist. It also used performance measures established by HCAOG.

The RTP 2026 Update includes new proposed projects, as well as removes some projects because they have been completed. The 2026 Update also revises the Regional Emergency Transportation proposed project to be more actionable with regard to planning output. The concept is to partner with emergency planners to lead emergency evacuation planning for access and functional need population, primarily through the SSTAC. Transportation impacts from the new proposed projects would be expected to fall within the range, severity, magnitude, duration, geographic scope, and programmatic nature of regional impacts on transportation and analysis on transportation previously identified in the FEIR. Thus, incorporation of the proposed changes would not result in any new significant transportation impacts or substantially increase the severity of transportation impacts beyond those programmatically addressed in the FEIR.

The changes in the proposed RTP 2026 update:

- 1) have not changed the nature or scale of the Regional Transportation Plan;
- 2) will not result in new or substantially more severe significant environmental effects; and
- 3) are not proposed under environmental conditions or circumstances substantially changed from those analyzed and addressed in the FEIR;

therefore, no additional analysis or discussion of these topics is required. **The determinations for environmental factors for transportation and circulation are the same as stated in the FEIR.**

TRIBAL CULTURAL RESOURCES

The proposed RTP 2026 update is not expected to result in any new or substantial increases in the severity of impacts to tribal resources beyond those already identified FEIR and Addendums. The 2013/14 FEIR assessed cultural resources as part of the Initial Study conducted for the project. It was determined that since RTP policies encourage the rehabilitation of existing infrastructure over construction of new infrastructure, and as the majority of proposed projects would take place in already disturbed areas, that impacts to cultural resources would be less than significant with mitigation incorporated and no further analysis was warranted. Tribal cultural resources (as defined above) are differentiated from other cultural resources in that they are typically unknown unless tribes are consulted on a site by site basis. This consultation would take place during project level CEQA analysis, not at the programmatic level.

Though not a required element under RTP guidelines, HCAOG has included a Tribal Transportation chapter in the RTP since 2008. In the 2021 Update, a new tribal transportation goal and three related policies were introduced. One of those policies is Policy Tribal-2 which is as follows:

POLICY TRIBAL-2 Support removing sovereign waiver: HCAOG supports legislation that would remove the limited waiver of sovereign immunity from Streets and Highways Code (SHC-94), and also expand the eligible projects to allow Caltrans to enter into direct contracts with tribes for projects in the Active Transportation Program.

Subsequent to adoption of this policy, Assembly Bill (AB) 1284 (Ramos) was enacted on September 27, 2024, adding Section 11019.82 to the Government Code to establish what is now known as the Tribal Cogovernance and Comanagement of Ancestral Lands and Waters Act. This statute encourages state agencies, including the Natural Resources Agency and its departments, to enter into cogovernance and comanagement agreements with federally recognized tribes for shared decision-making and resource management on ancestral lands and waters that are owned or controlled by the state. The law formalizes a government-to-government framework for shared decision-making and stewardship of ancestral lands and waters that are owned or controlled by the state. With enactment of AB 1284, the objectives of Policy Tribal-2 were codified in state law, making the policy redundant. As a result, this 2026 Update removes the policy to reflect the current statutory framework governing tribal engagement, consultation, and shared stewardship. This change aligns the 2026 RTP with existing state law and does not alter CEQA impact analysis or conclusions, as tribal coordination requirements are now implemented through statewide statutory authority rather than a separate regional policy.

The policies and projects included as part of the RTP 2026 Update are consistent with those originally proposed and analyzed as part of the 2013/14 FEIR and further strengthen and acknowledge Tribal partnerships. As such, it is not anticipated that plan updates will result in new or substantially more severe significant environmental effects to tribal cultural resources than what was analyzed in the FEIR.

The changes in the proposed RTP 2026 update:

- 1) have not changed the nature or scale of the Regional Transportation Plan;
- 2) will not result in new or substantially more severe significant environmental effects; and
- 3) are not proposed under environmental conditions or circumstances substantially changed from those analyzed and addressed in the FEIR;

therefore, no additional analysis or discussion of these topics is required. **The determinations for environmental factors for tribal cultural resources are the same as stated in the FEIR under cultural resources.**

WILDFIRE

The RTP 2026 Update does not introduce new policies or capital projects specifically focused on wildfire risk. However, wildfire-related considerations are indirectly addressed through updated climate change impact discussions, incorporation of statewide climate adaptation guidance, and expanded emergency transportation and evacuation planning provisions. Notably, the Update includes a new, more actionable project focused on regional emergency evacuation planning. This effort emphasizes coordinated planning for access and functional needs populations, integration of transit and paratransit services into evacuation operations, consideration of trail-based evacuation routes, and coordination with Humboldt County OES, HTA, Caltrans, and local/tribal partners.

Under this project, HCAOG would assume a lead coordinating role to develop and adopt a regional evacuation coordination framework that is consistent with existing local, regional, and state emergency operations plans and practices. The framework would clarify agency roles and formalize agreements among transit and paratransit providers, emergency management agencies, and human services organizations. It would also establish standard operating procedures for information sharing between emergency operations centers and transit dispatch centers, set policies for meeting evacuation transportation needs for access and functional needs populations, and include training and exercise components. The framework is intended to be adopted as an Access and Functional Needs (AFN) Annex to the County Emergency Operations Plan. By clarifying agency roles, formalizing interagency agreements, and establishing standard operating procedures for information sharing between emergency operations centers and transit dispatch centers, the framework enhances evacuation readiness and operational coordination during wildfire events.

Incorporation of the proposed changes would not result in new or substantially more severe significant environmental effects to wildfire than what was analyzed in the FEIR and Addendums. Based on the above analysis the changes in the proposed RTP 2026 update:

- 1) have not changed the nature or scale of the Regional Transportation Plan;
- 2) will not result in new or substantially more severe significant environmental effects; and
- 3) are not proposed under environmental conditions or circumstances substantially changed from those analyzed and addressed in the FEIR;

therefore, no additional analysis or discussion of these topics is required. **Impacts related to wildfire hazards will not require any additional mitigation and will be less than significant.**

LONG-TERM EFFECTS

An EIR must address a proposed project/plan's potential irreversible effects and growth-inducing impacts. Irreversible effects (*CEQA Guidelines* Section 15126(e)) mean irreversible environmental changes such as consuming expend or demolishing significant resources, particularly nonrenewable natural resources and irreplaceable cultural or historical resources. Significantly altering a natural resource through development, urbanization, and the like is also considered an irreversible impact under CEQA. Growth-inducing impacts (*CEQA Guidelines* Section 15126(g)) mean a proposed project's potential to foster economic or population growth, including by removing an existing obstacle(s) to growth.

The RTP 2026 Update proposes the same type of transportation projects that were proposed previously. To implement projects, jurisdictions/agencies would draw upon the same type of environmental and economic resources for construction, operations, and transportation services. The projects would be implemented within the same geographic areas, and in the same and similar settings within the built environment (e.g., developed areas, existing transportation corridors, and existing service areas). The RTP 2026 Update would not result in new significant environmental impacts not previously evaluated in the FEIR.

The changes in the proposed RTP 2026 update:

- 1) have not changed the nature or scale of the Regional Transportation Plan;
- 2) will not result in new or substantially more severe significant environmental effects; and
- 3) are not proposed under environmental conditions or circumstances substantially changed from those analyzed and addressed in the FEIR;

therefore, no additional analysis or discussion of these topics is required. **The determinations for potential irreversible effects and growth-inducing impacts are the same as stated in the FEIR.**

CONCLUSION

After completing a programmatic environmental assessment, the data updates and revisions to policies and programs in the 2026 RTP Update do not impose any new significant environmental effects or increase the severity of identified effects. If anything, they reduce potential impacts by supporting zero emissions fuels and promoting multi-modal connectivity to reduce greenhouse gas emissions. In addition, individual projects identified within the RTP will be covered by a project-level CEQA document at the time of project funding or implementation. Therefore, no new impacts will result from the changes listed above in the RTP that were not already analyzed in the Final EIR.

Changes and additions identified in the 2026 RTP Update would not result in new or substantially increased impacts and fall within the range, severity, magnitude, duration, geographic scope, and programmatic nature of impacts already identified in the previously certified FEIR. No substantial physical impacts to the environment beyond those already anticipated and documented in the FEIR are anticipated to result from the changes and additions identified the 2026 Update. Therefore, no new or more effective mitigation measures or alternatives are necessary or proposed beyond those already identified in the FEIR. Furthermore, each project identified in the RTP Update will be assessed at the project-level by the implementing agency in accordance with CEQA, National Environmental Policy Act, and all applicable regulations.

Based on the above, no new significant adverse environmental impact nor a substantial increase in previously identified significant impacts would occur as a result of the proposed 2026 RTP Update. Therefore, a subsequent or supplemental EIR is not required, and this Addendum to the previously certified FEIR fulfills the requirements of CEQA.

REFERENCES

- AEP. (2021, July). *CEQA Portal Topic Paper "Subsequent and Supplemental EIRs and Streamlining"*.
- California Transportation Commission. (2024, January 26). *2024 Regional Transportation Plan Guidelines for Regional Transportation Planning Agencies*. Retrieved from DOT: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/division-transportation-planning/regional-and-community-planning/sustainable-transportation-planning-grants/adopted-2024-rtp-guidelines-for-rtpas-2-a11y.pdf>
- CARB. (2022, December). *2022 Scoping Plan for Achieving Carbon Neutrality*. Retrieved from CARB: <https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf>
- CARB. (2024, December 20). *California Greenhouse Gas Emissions from 2000 to 2022: Trends of Emissions and Other Indicators*. Retrieved from CARB: https://ww2.arb.ca.gov/sites/default/files/2024-09/nc-2000_2022_ghg_inventory_trends.pdf
- CARB. (2024, July 16). *Table of Ambient Air Quality Standards*. Retrieved from CARB: https://ww2.arb.ca.gov/sites/default/files/2024-08/AAQS%20Table_ADA_FINAL_07222024.pdf
- County of Humboldt. (2017). *Humboldt County General Plan Update, Revised Draft EIR (SCH#2007012089)*.
- IPCC. (2023, March 20). *Sixth Assessment Report*. Retrieved from IPCC: <https://www.ipcc.ch/assessment-report/ar6/>
- NCUAQMD. (2025). *Planning & CEQA*. Retrieved from <https://www.ncuaqmd.org/planning-ceqa>
- OPR. (2016). *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA: Implementing Senate Bill 743 (Steinberg, 2013)*.
- State of California Natural Resources Agency. (2025, October). *Special Animals List*. Retrieved from California Department of Fish and Wildlife's (CDFW) Data Portal: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109406&inline>
- State of California Natural Resources Agency. (2025, October). *Special Vascular Plants, Bryophytes, and Lichens List*. Retrieved from California Department of Fish and Wildlife's (CDFW) Data Portal: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109383&inline>
- U.S. DOT. (2010). *National Highway Traffic Safety Administration, Analysis of Published Hydrogen Vehicle Safety Research*.