

APPENDIX C

Addendum #2 to the Final Environmental Impact Report prepared for the Humboldt Regional Transportation Plan 2013-14 Update

Addendum #2 has been prepared for HCAOG's RTP 2021 update:
Variety in Rural Options of Mobility (VROOM) 2022-2042

Regional Transportation Plan Update 2021 - VROOM ☀ 2022-2042 Humboldt County Association of Governments

ADDENDUM #2

to the Final Environmental Impact Report

prepared for the Humboldt Regional Transportation Plan 2013-14 Update

SCH# 2013102063

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. 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.

The RTPAs core functions are to "maintain a setting for regional decision-making" and "involve the public in this decision-making" (CTC 2017). In tandem with that function, RTPAs must prepare three documents:

- an annual Overall Work Program;
- a Regional Transportation Improvement Program (RTIP), a five-year program proposal of projects that regions prepare, in coordination with Caltrans, for inclusion in the State Transportation Improvement Program; and
- a long-range plan, the Regional Transportation Plan (RTP), which HCAOG must update every four years.

HCAOG's RTP, *Variety in Rural Options of Mobility* ("VROOM"), covers a 20-year planning horizon. *VROOM 2022-2042* (also called RTP 2021 in this document) updates the version that HCAOG updated and adopted in 2013-2014 and in 2017. In conjunction with the 2014 update, HCAOG certified the Final Environmental Impact Report (EIR) in July 2014 (State Clearinghouse #2013102063) and a subsequent addendum for the 2017 Update was prepared and adopted in November 2017 (HCAOG Resolution 17-17). HCAOG has assessed the potential environmental impacts of the 2021 update and has documented the assessment and findings in this Addendum #2 to the Final EIR. An EIR addendum, as a specific document defined by CEQA statute, is discussed below.

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 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 is to update the *Humboldt Regional Transportation Plan Update 2013/14 Update–Final Environmental Impact Report* (FEIR; State Clearinghouse #2013102063) and *2017 Addendum* based on changes proposed in the 2021 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 2021 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 2021 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 2017. Before adopting the 2017 Update in December 2017, the HCAOG Board adopted an Addendum to the Final Program EIR (State Clearinghouse #2013102063) in November 2017 (Resolution 17-17).

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 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.

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 2021 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 2021 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, and 2021 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 2021 update; it does

not duplicate the FEIR's or 2017 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.

Further, as noted in the 2014 FEIR (Section 2.0), the Program EIR analysis does not apply to projects for which funding is not programmed through HCAOG, generally including Caltrans or Harbor District related projects.

PROJECT DESCRIPTION: *REGIONAL TRANSPORTATION PLAN 2021 UPDATE*

The proposed project is the update of the Regional Transportation Plan (RTP) for Humboldt County, uniquely referred to as "VROOM 2022-2042" (for *Variety in Rural Options of Mobility*). The RTP 2021 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 2021 consistent with current RTP guidelines (CTC 2017) 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 December 2017 (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 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.

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

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

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 2022-2042* overall goal and objectives remain the same but have been slightly refined as noted below (HCAOG 2021):

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.

2021 Updates

The *VROOM 2022-2042* 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 major changes to the 2021 update consist of a new *Renewing Our Communities* chapter with *Safe and Sustainable Transportation Targets* and a new *Land Use–Transportation* element. The update also rearranges and streamlines policies for clarity and to reduce redundancy. *VROOM 2022-2042* new/updated policies are below.

2. Renewing Our Communities (New Chapter)

Summary of Table *Renew-3 Safe and Sustainable Transportation Targets*²

Performance Measure	Regional Target(s)
Reduce GHG Emissions in Air District (NCUAQMD)	Reduce on-road transportation related fossil fuel consumption.
Percent Mode Shift	Increase alternative transportation trips, increase transit trips, and complete low-traffic-tress and connectivity analysis of Greater Humboldt Bay.
Reduce Vehicle Miles Travelled by Car	Reduce VMT per capita.
Zero-Emission Vehicle Infrastructure	Evaluate priority of feasible public-charging spaces, EVCS and Electrical upgrade policies adopted by jurisdictions, increase availability of public and private electric charging infrastructure, and increase hydrogen fueling infrastructure.
Percentage of Zero-Emission School Buses & Public Fleet Vehicles	All public and school buses become zero-emission, and governmental and public fleet conversions to zero-emission vehicles.
Efficiency & Practicality in Locating New Housing	Identify locations to survey for access to essential destinations, develop connectivity scores, encourage infill, jurisdictions adopt zoning incentives for highly connected areas.

² RTP 2021 Update, Chapter 2 – *Renewing Our Communities*: Table *Renew-3 Safe and Sustainable Transportation Targets*; pages 2-12 to 2-17.

Convenient Access to Destinations	Develop communities where population can safely, comfortably, and conveniently travel to everyday destinations using alternative modes of transportation.
Vision Zero	Maintain zero pedestrian and bicyclist fatalities per year or reduce fatalities every year until zero occur and decrease number of people seriously injured in bicycle and pedestrian collisions.
Active Transportation Education	Increase multi-modal education in classrooms, increase programs that incentivize multi-modal travel, increase active-transportation marketing.
Invest in Complete Streets	Increase regional discretionary funding for active transportation projects and secure new funding sources to benefit active transportation and transit.

Policy Equity-1 Land Acknowledgement.

- HCAOG benefits from using office space and Board meeting space in Eureka, which is unceded ancestral land of the Wiyot. HCAOG will work to secure a stable funding source with which to contribute to the voluntary Wiyot Honor Tax in order to monetarily compensate the Wiyot Tribe for this benefit. If HCAOG cannot access any governmental fund that allows this type of expenditure, HCAOG will advocate for policy that creates funds that allow this as an eligible use.
- Begin HCAOG Board meetings and workshops with a verbal indigenous-land acknowledgement.

Policy Equity -2 Establish Goals, Actions (Planning)

- Adopt diversity, equity and inclusion goals and implementing actions. Integrate the implementing actions in the annual Overall Work Plan so that staff efforts are not peripheral but embedded in the everyday work development of the regional agency. Budgets for engaging the community and building partnerships must be real.
- Develop a multi-pronged plan with actions/approaches and policies to use our position to help uproot an unjust system and support the creation of equitable transportation and human landscapes.

Policy Equity -3 Training

- HCAOG staff will continue internal bias and equity development and restructure our organization so that our efforts are not peripheral but embedded in our everyday work and decisions. The HCAOG board of directors commits to doing additional learning and development as governors of our regional foundation.
- Allocate time and resources to educate the HCAOG staff. Provide each staff member paid time to be used for social justice training or social justice work related to transportation, including participating for education, engagement, and encouragement events for underrepresented or disadvantaged communities.

Policy Equity -4 Procurement, Hiring, Committee Representation

- Take an anti-racist, equitable approach to procurement: Purchase supplies equitably such that disadvantaged businesses get the same benefits as historically advantaged businesses.
- Fully implement best practices for hiring processes, including for contract work, that improve outcomes for finding, hiring and promoting people of color and of varying backgrounds who fully

reflect the fabric of our region and nation. Support internships to increase black, indigenous, and people of color (BIPOC) professional experience in transportation planning.

- Review diversity and representation criteria for HCAOG committee and staff recruiting processes. Continue monitoring and adapting how that leads to greater outcomes of diversity and governance.

Policy Equity -5 Equity Funding, Prioritization

- Take an anti-racist, equitable approach to transportation funding and project prioritization. Position funding investments and multi-modal-transportation advocacy efforts within the framework of equity and social justice.
- Follow the direction of BIPOC urbanist and mobility experts to operationalize the steps required to transform systems and to promote the actions most likely to create anti-racist walkable environments. Only support projects and initiatives that address structural racism and implement anti-racist efforts.
- HCAOG shall prioritize projects that have been planned and designed to bring economic benefits to communities that have had disproportionately low transportation investments and/or disproportionately high transportation harms.

Policy Equity -6 Partnerships, Advocate, Educate

- Commit staff time and resources to build mutually-enriching relationships with partners who are supporting social justice efforts on the local level, to work to address systemic racism in transportation and land use structures.
- Support our partners working to create equitable transportation projects and programs in communities throughout Humboldt.
- Advocate at the federal, state and local levels of government for policies that improve communities by fostering inclusion and supporting equitable and complete mobility networks.
- Educate and inform by telling the history of racial bias and injustice in transportation and land policies and laws at the national, state, and local level.
- The imagery and graphics in promotional materials, PSAs, and social media shall reflect the diverse communities in the whole county.

Policy Equity -7 Data Collection

- Identify and begin implementing actions to strengthen mobility justice and anti-racism in data collection and analysis projects.

4. Tribal Transportation

TRIBAL TRANSPORTATION GOAL: Tribal communities have safe and efficient mobility options, benefit from equitable access to transportation resources, and have strong interjurisdictional partnerships for advocating and solving transportation issues of tribal communities. *(New)*

Policy Tribal-1. HCAOG supports the mission of the NCTTC and actively engages with the NCTTC. This includes support for the formation of a tribal joint powers authority for the purpose of applying for a seat on the HCAOG Board. *(New)*

Policy Tribal-2. 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. *(New)*

Policy Tribal-3. HCAOG supports Caltrans' initiative to review all named assets located on the state transportation system and propose assets to be renamed. HCAOG will participate in dialogue around re-naming places and transportation infrastructure in an effort to redress discriminatory names. *(New)*

5. Emergency Transportation

Policy Emergency-3. HCAOG will facilitate and encourage involving people with disabilities and disability organizations, and other transportation-vulnerable stakeholders, in emergency planning, including assessments, exercises, training, debriefing, and post-action reports. *(Updated)*

6. Land Use - Transportation (New Chapter)

GOAL: Throughout Humboldt County, we grow communities equitably and efficiently to create safe, sustainable access to places and opportunities, while conserving or utilizing land respectfully so that future generations can also enjoy optimal land uses and value. All our communities benefit from having quality transportation choices for getting to jobs, services, and home.

Policy Land-1. Reduce driving: HCAOG encourages and supports land use planning and projects that accommodate reducing driving, such as through infill development, pedestrian-friendly streets, bicycle infrastructure, and transit-oriented development. HCAOG staff will provide information on transit-oriented development, as requested. HCAOG encourages member and committee agencies to engage transit operators when planning or reviewing new developments.

Policy Land-2 Expand transit ridership: HCAOG advocates for and supports land use policies and programs that will enable enriched intra- and inter-regional transit service and multi-modal connections in urbanized areas throughout the county. HCAOG shall advocate for and support expanded and stable funding for transit.

Policy Land-3 Sustainable tax base: HCAOG advocates for local governments to develop codes and ordinances that result in land use development patterns that will be affordable to maintain, for the life of the infrastructure, with the communities' tax base and fee revenues, and that will foster healthy municipal cash flows and affordable housing supply.

Policy Land -4 Nearby access to essential services: HCAOG supports mixed-use land uses for fostering successful commercial and work opportunities near where people live, and advocates for mixed-use development patterns to include affordable housing and essential services for people with low and very low incomes.

Policy Land -5 Transportation for compact, mixed-use development: HCAOG shall work towards increasing coordination with land use decision-making agencies to identify and prioritize specific transportation investments needed to support compact, mixed-use development. HCAOG recognizes transit-oriented development transit service as valuable investments for achieving efficient land use. *(CTP 2050 recommended action)*

Policy Land -6 Repurpose for compact, mixed-use development: HCAOG will encourage and support local agencies to pursue opportunities to repurpose antiquated land uses, such as gas stations, parking lots, and large shopping centers, to support compact, mixed-use development and sustainable mobility options. *(CTP 2050 recommended action)*

Policy Land -7 Reduce subsidized parking costs: HCAOG advocates for land use policies and projects that curtail the amount and/or cost of tax-subsidized parking in commercial and mixed-use areas. HCAOG will support local agencies in reducing parking minimum and/or enacting parking maximums, and will provide support in identifying funding for and implementing mobility solutions that reduce parking demand. *(CTP 2050 recommended action)*

Policy Land-8: Support local communities in developing integrated transportation and land use strategies for responding resiliently to climate change, and codifying such strategies in General Plans, Regional Transportation Plans, Local Coastal Programs, and Climate Action Plans. HCAOG will review proposed development projects in member jurisdictions and provide feedback on the projects' impacts on regional efforts to meet adopted targets for greenhouse gas emission reductions, vehicle miles travelled (VMT), mode shift, traffic safety, and zero emission vehicles.

Policy Land -9 Prioritize community needs: HCAOG shall prioritize investments in under-resourced (disadvantaged) communities to improve mobility and access to jobs, education, health care, services, and recreation. HCAOG shall focus on investments that are aligned with community-identified transportation needs. *(CTP 2050 recommended action)*

Policy Land -10 Anti-displacement: HCAOG supports policies to protect marginalized and disadvantaged communities from displacement and community fragmentation that may result from transportation investments (e.g., tenant protections, affordable housing production, and affordable housing preservation). *(CTP 2050 recommended action)*

7. Complete Streets and Connected Communities

Complete Streets policies were rearranged and consolidated for clarity.

8. Commuter Trails

Policy Trails-6. HCAOG supports collaborative, multi-jurisdictional projects that consider adaptation to sea-level rise in trail planning and development. *(New)*

9. Public Transportation

Public transportation policies were rearranged and consolidated for clarity.

10. Aviation System

Policy AS-1.³ HCAOG shall support efforts to integrate aviation with other modes of transportation for the conveyance of people and goods. HCAOG shall encourage programs and projects that improve multimodal surface transportation to airports (e.g. transit/microtransit, secure bicycle storage, rideshare, mobility on-demand). HCAOG shall apply Complete Streets strategies to commercial airport access road improvements for regional projects included in the Regional Transportation Plan and/or the accompanying Airport Ground Access Improvement Program (AGAIP) for the Redwood Coast Airport (per California Government Code §65081.1(a)). *(Updated)*

Policy AS-3. HCAOG shall support regional, long-term airport planning to maintain the utility of Humboldt County airports and maximize connections to the national aviation network, including intermodal connections. HCAOG encourages airport operators to review airport needs and regularly update airports plans, and implement capital improvement programs. *(Updated)*

Policy AS-4. HCAOG shall support fix-it-first facility improvements for airports and efforts to maintain and expand air freight and scheduled passenger airline service for Humboldt County. *(Updated)*

³ 2017 Policies AS-2, AS-3 and AS-5 were incorporated into Policy AS-1

11. Goods Movement (ground, air, maritime)

Policy GM-2 (Intermodal). HCAOG shall encourage and support safe, multimodal accessibility at Humboldt’s public use airports and seaports. *(Updated)*

Policy GM-5 (Aviation). HCAOG shall help promote fully and efficiently utilizing air freight capabilities in Humboldt County, and shall support increasing regional aviation resources for intermodal goods movement, as compatible with multimodal and GHG emission-reduction goals. *(Updated)*

Policy GM-6 (Rail Right-of-Way). HCAOG encourages the highest and best use of rail facilities and right-of-way in Humboldt County, and supports banking and preserving the rail right-of-way in Humboldt County until it is economically viable and environmentally compatible to restore freight or passenger rail service. *(Updated)*

Policy GM-10 (ZEV). HCAOG will work with the freight industry to encourage and help accelerate the widespread transition to zero-emission technologies and infrastructure (CAPTI 2021). *(New)*

Policy GM-12 (Maritime). HCAOG will assist local, regional, or state lead agencies in preserving coastal-dependent land uses as necessary for successfully operating the regional maritime transport system to meet demands for its highest and best use. *(Updated)*

Projects

The RTP 2021 update’s proposed regional projects that are new from the RTP 2013/14 Update and 2017 Update are listed below in the following five tables:

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 new regional trails projects proposed in the Commuter Trails Element update (serving transportation needs not just recreational).

Table *Projects-3* lists new proposed regional public transportation projects proposed in the Public Transportation Element.

Table *Projects-4* lists new regional transportation projects in the Tribal Transportation Element.

Table *Projects-5* lists new regional transportation projects in the Global Climate Change Element.

There are no new projects proposed for the Action Plans of the Aviation System Element, Emergency Transportation 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 2021 RTP Update

Jurisdiction	Location	Project Description
Arcata	South G street Beautification Project (South of Samoa 255 to Arcata wastewater treatment plant)	Rehabilitation, pedestrian-bicycle and traffic calming improvements
Arcata	Samoa Gateway Improvements Project (From L street to V street)	Rehabilitation, pedestrian-bicycle, traffic calming improvements and gateway to Arcata
Arcata	West End Road Improvements (Giuntoli Lane to City Limits)	Rehabilitation, pedestrian-bicycle, traffic calming improvements and gateway to Arcata
Arcata	8th and 9th Street Improvements	Bicycle and Pedestrian Enhancements and Street Beautification
Blue Lake	Acacia Dr from Blue Lake Blvd to Railroad Ave	Rehabilitation and reconstruction with pedestrian improvements

Jurisdiction	Location	Project Description
Blue Lake	Rymar Ave from Blue Lake Blvd to Railroad Ave	Rehabilitation and reconstruction with pedestrian improvements
Blue Lake	Railroad Ave from H St to Blue Lake Blvd	Rehabilitation and reconstruction with pedestrian improvements
Eureka	Broadway Multimodal Corridor – Northern Section (Hawthorn to 4 th)	Street reconfiguration, Class IV bike facil, pedestrian crossings, transit improvements
Eureka	Broadway Multimodal Corridor – Middle Section (Truesdale to Hawthorn)	Street reconfiguration, Class IV bike facil, pedestrian crossings, transit improvements
Eureka	North Gateway of Eureka	Beautification, bike/ped facilities, traffic calming
Eureka	C Street Bike Boulevard	Bike Boulevard and pedestrian improvements
Eureka	M Street Bike Boulevard	Bike Boulevard and pedestrian improvements
Eureka	Eureka East/West Bike Boulevard	Bike Boulevard and pedestrian improvements
Eureka	Bay to Zoo Trail	Class I & III trail, pedestrian crossing improvements
Eureka	Cooper Gulch Trail (first slough)	Class I & III trail, pedestrian crossing improvements
Eureka	Eureka Loop Trail	Class I & III trail, pedestrian crossing improvements
Eureka	Wabash Ave Improvements	Road rehabilitation, ADA, pedestrian improvements, bicycle facility
Rio Dell	Ogle Avenue, Spring St to Creek St	Road reconstruction and drainage improvements
Rio Dell	Northwestern Ave, north to south entrance of Business Park	Centerline and edge striping, centerline monument, drainage, road elevation repair
Rio Dell	Blue Slide Road, City limits to Creek St	Drainage work and chip seal
Rio Dell	Wildwood Avenue, Center to Eagle Prairie Bridge	Slurry seal and striping
Rio Dell	Sequoia Avenue at Dean Creek Bridge	Bridge inspection and engineering report
Rio Dell	Belleview Ave., Painter St., Ireland St., Center St., and Davis St.	Improve sidewalk, ADA crossings and curb ramps, and crosswalks
Trinidad	Edwards St, Main St	Crossing enhancements
Trinidad	Stagecoach Rd, Frontage Rd, Westhaven Dr	Edgeline and centerline striping
Trinidad	Scenic Dr, Patrick's Point Dr	Guardrail upgrades
Trinidad	Main Street (south side)	Sidewalks, driveways & curb ramps
Humboldt County	Scenic Drive	Road reconstruction
Humboldt County	Patrick's Point Drive	Road reconstruction

Table *Projects-2* New Regional Commuter Trail Projects Proposed in the 2021 RTP Update

Jurisdiction	Trail Project	Project Description
Eureka	Bay-to-Zoo Trail	Paved 2-mile trail that will provide connection between Waterfront Trail and Sequoia Park and Zoo
Eureka	Elk River Trail	Extend Hikshari' Trail South to Tooby Road/ Humboldt Hill. Park of the Elk River Interpretive Center and restoration project

Table *Projects-3* New Regional Projects for Public Transportation Proposed in the 2021 RTP Update

Operator/Agency	Location	Project Description
HTA	HTA Maintenance Yard, Eureka	Hydrogen Fueling Station
Arcata	Arcata Transit Center	Rooftop Solar PV System

Table Projects-4 New Regional Projects for Tribal Transportation Proposed in the 2021 RTP Update

Jurisdiction	Location	Project Description
Hoop Valley Tribe	Mashall Lane	Road Improvements
Hoop Valley Tribe	Hoop	Transportation and Road Maintenance Facility
Trinidad Rancheria	N/A	Long Range Transportation Plan Update
Trinidad Rancheria	Scenic Drive	Slope Stabilization Mitigation Planning Study
Yurok Tribe	Klamath River	Klamath Tsunami Trail
Yurok Tribe	Klamath Boulevard	Crosswalk
Yurok Tribe	Klamath Beach Road	Resurfacing Project
Yurok Tribe	Klamath River	Expansion of River Ferry
Yurok Tribe	Tulley Creek Road	Resurfacing Project
Yurok Tribe	Weitchpec School Road	Intersection Improvements
Yurok Tribe	New Village Road	Intersection Improvements
Yurok Tribe	N/A	Car Seat and Seat Belt Educational Program
Yurok Tribe	SR169 & McKinnon Hill Road	Road Safety Audit
Yurok Tribe	Bald Hills Road	Road Improvements
Yurok Tribe	New Village Road	Resurfacing Project
Yurok Tribe	Morekwon Road	Resurfacing Project
Yurok Tribe	McKinnon Hill Road	Resurfacing Project
Yurok Tribe	Jack Norton School Road	Resurfacing Project

Table Projects-5 New Regional Projects for Global Climate Change Proposed in the 2021 RTP Update

Agency	Location	Project Description
HCAOG	Countywide	ZEV Infrastructure: Work with agencies on infrastructure planning to optimize development and use of the electric grid and clean-fuel supply infrastructure, and to make more public right-of-way available for ZEV charging infrastructure.
HCAOG	Countywide	Promote Electric Bikes: Explore partnerships and incentive programs to support expanded use of e-bikes, such as programs that reduce the total cost of EV ownership. Support educating agencies, businesses, schools, and residents about the benefits of electric vehicles.

IMPACTS ASSESSMENT

As summarized above, the RTP update consists of a new Renewing Our Communities chapter with Safe and Sustainable Transportation Targets table, a new Land Use–Transportation element, some new policies, and updated Action Plans. The RTP 2021 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 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 RTP and, in fact, 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. No new major projects are proposed in the revised Action Plans in the RTP 2021 update.

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

For the proposed project, the RTP 2021 update, the existing analysis contained in the environmental checklist of the Initial Study (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 Initial Study, 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 2021 update:

- 1) have not changed the nature or scale of the Regional Transportation Plan; and
- 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 these environmental factors is the same as concluded in the Initial Study Checklist: With the FEIR mitigation and monitoring program incorporated, the proposed RTP 2021 update will have a less-than-significant adverse environmental impact in these ten environmental factors.

The Program EIR 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 and 2017 Addendum.

Because the nature and scope of the projects proposed in the RTP 2021 update has not significantly changed from the 2014 Update, and because the conditions discussed in the 2014 FEIR have not substantially changed for **air quality, 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 **biological resources, greenhouse gas emission and climate change, transportation/circulation, 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. Also, in response to recent legislation and updates to CEQA guidelines, a brief analysis of potential impacts to **energy, tribal cultural resources, and wildfire** is included below.

BIOLOGICAL RESOURCES

The FEIR includes lists of federal- and State-listed special status animal and plant species known to occur, or with potential to occur, within Humboldt County (FEIR Table 4.2-2 and 4.2-3). The lists are based on the California Department of Fish and Wildlife’s (then Fish and Game) 2003 California Natural Diversity Database (CNDDDB) and the U.S. Fish and Wildlife Service’s Information Planning and Conservation System (IPaC) in 2014 (from the Environmental Conservation Online System). Below we have noted revisions to information in the FEIR tables, which are minor yet pertinent.

Table *Bio-1*: **Special Status Animal Species Known to Occur or with Potential to Occur within Humboldt County**

Scientific Name	Common Name	Federal Status	State Status	CDFW Status
Amphibians				
<i>Plethodon elongatus</i>	Del Norte salamander	None	None	SSC WL
<i>Rana boylei</i>	foothill yellow-legged frog	None	None Endangered	SSC
Birds				
<i>Agelaius tricolor</i>	tricolored blackbird	None	None Threatened	SSC
<i>Aquila chrysaetos</i>	golden eagle	None	None	FP; WL
<i>Charadrius alexandrinus</i> <i>nivosus</i> - <i>Charadrius nivosus</i> <i>nivosus</i>	western snowy plover	Threatened	None	SSC
<i>Coccyzus americanus occidentalis</i>	western yellow-billed cuckoo	Proposed Threatened	Endangered	-
<i>Oceanodroma furcata</i> <i>Hydrobates furcatus</i>	fork-tailed storm-petrel	None	None	SSC
<i>Rallus longirostris</i> <i>obsoletus</i> <i>Rallus obsoletus obsoletus</i>	California clapper rail California Ridgway’s rail	Endangered	Endangered	FP
<i>Strix occidentalis caurina</i>	Northern spotted owl	Threatened	Candidate Threatened	SSC -
Fish				
<i>Eucyclogobius newberryi</i>	tidewater goby	Endangered	None	SSC -
<i>Oncorhynchus mykiss irideus</i>	summer-run steelhead trout	None	None Candidate Endangered	SSC
<i>Oncorhynchus tshawytscha</i>	chinook salmon – California coastal ESU	Threatened	None	SSC -
<i>Oncorhynchus tshawytscha</i>	chinook salmon – spring-run Klamath-Trinity Rivers pop.	None Candidate	None Candidate Endangered	SSC
<i>Spirinchus thaleichthys</i>	longfin smelt	Candidate	Threatened	SSC -
<i>Thaleichthys pacificus</i>	eulachon	Threatened	None	SSC -

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

Table Bio-2: Special Status Plant Species Known to Occur or with Potential to Occur within Humboldt County**

Scientific Name	Common Name	Federal Status	State Status	CA Rare Plant Rank
<i>Anomobryum julaceum</i>	slender silver moss	None	None	2B.2 <u>4.2</u>
<i>Arctostaphylos canescens</i> <i>ssp. sonomensis</i>	Sonoma canescent manzanita	None	None	1B.2 <u>CBR</u>
<i>Astragalus umbraticus</i>	Bald Mountain milk-vetch	None	None	2B.3 <u>2B.2</u>
<i>Coptis laciniata</i>	Oregon goldthread	None	None	2B.2 <u>4.2</u>
<i>Didymodon norrisii</i>	Norris' beard moss	None	None	2B.2 <u>CBR</u>
<i>Eucephalus vialis</i>	wayside aster	None	None	1B.2 <u>CBR</u>
<i>Hemieva ranunculifolia</i>	buttercup-leaf suksdorfia <u>hemieva</u>	None	None	2B.2
<i>Horkelia sericata</i>	Howell's horkelia <u>silky horkelia</u>	None	None	4.3
<i>Lupinus constancei</i>	The Lassics lupine	None	None <u>Endangered</u>	1B.2 <u>1B.1</u>
<i>Mielichhoferia elongate</i>	elongate copper moss	None	None	2B.2 <u>4.3</u>
<i>Minuartia decumbens</i> <u><i>Sabulina decumbens</i></u>	The Lassics sandwort	None	None	1B.2
<i>Sedum laxum</i> ssp. <i>flavidum</i> <u><i>Sedum flavidum</i></u>	pale yellow stonecrop	None	None	4.3
<i>Sidalcea oregana</i> ssp. <i>eximia</i>	coast sidalcea <u>coast checkerbloom</u>	None	None	1B.2
<i>Thermopsis gracilis</i>	slender false lupine	None	None	4.3 <u>CBR</u>
<i>Usnea longissimi</i>	Long-beard lichen <u>Methuselah's beard lichen</u>	None	None	- <u>4.2</u>

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

**Only those plants with changes since the 2014 FEIR are listed.

CBR: Considered but rejected. Plants are not removed from the Rare Plant list if they are no longer deemed threatened or watch list. They are instead listed as CBR with a cited reason.

California Rare Plant Rank:

- 1A=Presumed Extinct in California
- 1B=Rare, Threatened, or Endangered in California and elsewhere
- 2=Rare, Threatened, or Endangered in California, but more common elsewhere
- 3=Need more information (a Review List)
- 4=Plants of Limited Distribution (a Watch List)

The minor changes in the proposed RTP 2021 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.**

Section 15126.2(b): Energy Impacts.

If analysis of the project's energy use reveals that the project may result in significant environmental effects due to wasteful, inefficient, or unnecessary consumption use of energy, or wasteful use of energy resources, the EIR shall mitigate that energy use. This analysis should include the project's energy use for all project phases and components, including transportation-related energy, during construction and operation. In addition to building code compliance, other relevant considerations may include, among others, the project's size, location, orientation, equipment use and any renewable energy features that could be incorporated into the project. (Guidance on information that may be included in such an analysis is presented in Appendix F.) This analysis is subject to the rule of reason and shall focus on energy use that is caused by the project. This analysis may be included in related analyses of air quality, greenhouse gas emissions, transportation, or utilities in the discretion of the lead agency.

ENERGY

In 2019, the Governor's Office of Planning and Research (OPR) and the California Natural Resources Agency made several updates to the CEQA Guidelines. In an effort to clarify the required analysis for energy resources, they added subdivision (b) (see sidebar) to Section 15126.2. As well, they added a new resource section to Appendix G. Section VI. Energy, which now asks:

Would the project:

- a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?
- b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The use of energy, particularly as it relates to greenhouse gas emissions, was discussed in portions of the 2013/14 FEIR. However, energy was not directly discussed or analyzed as a separate resource. As such, a brief discussion of the RTP 2021 update's use of energy is provided below.

Would the project result in potentially significant environment impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

One of the primary goals of the RTP 2021 update is to reduce the transportation sector's levels of greenhouse gas emissions and create a mode shift to walking, biking, and transit. The plan also encourages development of zero-emission vehicle infrastructure such as additional electric charging stations and hydrogen fueling stations as well as encourages planning for and building communities that reduce the need to drive, such as through infill development and other programs. This mode shift away from driving will inherently reduce the amount of energy utilized for transportation.

Additionally, the majority of projects listed are to rehabilitate existing infrastructure rather than create new infrastructure. While some new roadways or travel paths may be created as a result of the RTP, by focusing on revitalizing existing roads and pathways, the plan decreases the high energy cost of establishing a substantial amount of new roadways and other travel pathways. As such, impacts related to the wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation, will be **less than significant**.

Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The RTP 2021 update refers to several related plans including the Caltrans District 1 “Climate Change Vulnerability Assessment and Pilot Study,” the “California Transportation Plan 2050,” and the California “Climate Action Plan for Transportation Infrastructure.” These plans, along with many others, were taken into consideration when developing the goals and policies included in the RTP 2021 update. As the RTP 2021 update considered several plans related to renewable energy and energy efficiency, and since the RTP 2021 update encourages more active transportation and use of public transportation rather than passenger vehicles, there will be **no impacts** related to conflicts with state or local plans for renewable energy or energy efficiency.

Based on the above analysis the changes in the proposed RTP 2021 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 energy resources will not require any additional mitigation and will be less than significant.**

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. The state was able to reach its target of returning to 1990 levels four years earlier than mandated and is currently implementing strategies from the 2017 Scoping Plan to further reduce GHG emissions (CARB 2021a).

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 they did in the *2017 Climate Change Scoping Plan Update—The Proposed Strategy for Achieving California’s 2030 Greenhouse Gas Target* (CARB 2017). As reiterated in the *2017 RTP Guidelines for RTPAs*, State agencies should use 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 must also employ full life-cycle cost accounting to evaluate and compare infrastructure investments and alternatives.

The “California Greenhouse Gas Inventory 2000-2019,” 2021 edition, offers updated data from what was available in 2014 and 2017. In it, CARB reports:

- In 2019, statewide emissions of CO₂ from routine emitting activities declined 7.2 million metric tons of CO₂ equivalent (MMTCO₂e) from 2018 levels; statewide emissions have decreased since peak levels in 2004 and dropped below the 2020 GHG limit in 2016.
- Per capita GHG emissions in California have dropped from a 2001 peak of 14.0 tonnes per person to 10.5 tonnes per person in 2019, a 25% decrease.
- The transportation sector remains the largest source of GHG emissions in the state, accounting for 40% of the inventory in 2019 and saw a reduction of 3.5 MMTCO₂e from 2018.
- Emissions from the electric power sector comprise 14% of 2019 statewide GHG emissions and continue to decline due to growing zero-GHG energy generation sources.
- Emissions from the industrial sector in 2019 decreased about 1 MMTCO₂e from 2018 and the residential sector increased about 2.4 MMTCO₂e from 2018 to 2019 due to an increase in natural gas usage.
- Emissions from the remaining sectors have remained relatively constant. (CARB 2021b)

The Intergovernmental Panel on Climate Change’s (IPCC’s) *Sixth Assessment Report* (currently being drafted) includes projected changes in the global climate system according to different levels of future GHG emissions. Although the range of temperature changes have not substantially changed from what is reported in the 2014 FEIR (based on a 2007 IPCC report), the minimum increases under most scenarios appears to have increased substantially:

The increase of global mean surface temperature by the end of the 21st century (2081–2100) relative to 1986–2005 is likely to be 1.0°C to 1.8°C under a stringent mitigation scenario (SSP1-1.9); 1.3°C to 2.4°C or 2.1°C to 3.5°C under two respective intermediate scenarios (SSP1-2.6 and SSP2-4.5); and 2.8°C to 4.6°C or 3.3°C to 5.7°C under two very high GHG emission scenarios (SSP3-7.0 and SSP5-8.5) (“Climate Change 2021: The Physical Science Basis IPCC 2021).

Other summary points from the *IPCC Sixth Assessment 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.
- Human influence is *very likely* the main driver of the global retreat of glaciers since the 1990s and the decrease in Arctic sea ice area between 1979–1988 and 2010–2019 (about 40% in September and about 10% in March).
- Over the period 1901 to 2018, global mean sea level rose by 0.20 [0.15 to 0.25] m. The average rate of sea level rise was 1.3 [0.6 to 2.1] mm yr⁻¹ between 1901 and 1971,

increasing to 1.9 [0.8 to 2.9] mm yr⁻¹ between 1971 and 2006, and further increasing to 3.7 [3.2 to 4.2] mm yr⁻¹ between 2006 and 2018 (*high confidence*).

- It is *virtually certain* that hot extremes (including heatwaves) have become more frequent and more intense across most land regions since the 1950s, while cold extremes (including cold waves) have become less frequent and less severe, with high confidence that human-induced climate change is the main driver of these changes.
- In 2019, atmospheric carbon dioxide concentrations were higher than at any time in at least 2 million years (*high confidence*), and concentrations of methane and nitrous oxide were higher than at any time in at least 800,000 years (*very high confidence*) (IPCC 2021)

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

- The County has been working with local jurisdictions to create a Regional Qualified Climate Action Plan that includes target reduction levels for each city within Humboldt County. The plan will also include multiple implementation programs to help reach target levels. Adoption is anticipated in 2022.
- Redwood Coast Energy Authority (RCEA) updated their comprehensive action plan in 2019. Now known as “RePower Humboldt,” the plan seeks to reach 100% zero-carbon electricity for Humboldt County by 2030.
- Humboldt County adopted a resolution in 2018 declaring support for the Paris Agreement and establishing a goal of 100% renewable energy for the County of Humboldt’s operations.

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 late 2020, community members urged HCAOG to identify more meaningful and proactive actions to address climate change. The HCAOG Board responded by forming an ad-hoc Regional Transportation Plan (RTP) Greenhouse Gas Targets Committee to draft emissions-reduction targets to incorporate into VROOM. The Committee, along with public stakeholders who participated actively, drafted targets and performance measures. The Board approved the Committee’s recommendations, which are now VROOM’s Safe and Sustainable Transportation (SST) Targets. (The full table of targets is in Chapter 2, Renewing Our Communities.) HCAOG will apply the SST Targets to measure the progress that VROOM 2022-2042’s projects and programs make towards regional goals to:

- reduce regional VMT
- increase transit ridership
- transition to zero-emission fleets
- improve accessibility through better land use
- achieve zero pedestrian and bicyclist fatalities, and
- increase active transportation education

The changes in the proposed RTP 2021 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

As noted in the 2017 Addendum, 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).

As of January 2020, lead agencies must adhere to Section 15064.3: Determining the Significance of Transportation Impacts, which states in part:

Generally, vehicle miles traveled is the most appropriate measure of transportation impacts. For the purposes of this section, "vehicle miles traveled" refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel. Except as provided in subdivision (b)(2) . . . (regarding roadway capacity), a project's effect on automobile delay shall not constitute a significant environmental impact.

A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled, and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project.

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 proposed RTP 2021 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, which added the following thresholds for significant impacts:

- A change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks;
- Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or
- Result in inadequate emergency access.

The RTP 2021 update includes new proposed projects, as well as deletes some projects because they have been accomplished (mostly in the Complete Streets Element). It also includes policies related to decreasing overall VMTs by encouraging infill and multi-modal transportation as noted in Table *Renew-3* – Safe and Sustainable Transportation Targets. These targets include a mode shift to 40% alternative transportation by 2050, reducing VMT per capita 25% by 2030, and encouraging development in areas that are highly connected so that residents may reach everyday destinations safely, comfortably, and conveniently without the use of a personal vehicle. All of these strategies would help reduce overall VMTs in the County and result in limited transportation resource impacts.

The new proposed projects do not change the overall scope or nature of projects as adopted in the 2013/14 RTP (See herein the Tables *Projects-1* through 4 for all new proposed projects). None conflict with applicable adopted transportation plans; none are related to air traffic patterns; projects listed in the Complete Streets Element aim to design and deliver projects that will decrease hazards; none propose design concepts that would hinder existing emergency access; and transit projects consist of capital projects (e.g. purchasing new fleet inventory) and new transit service.

The changes in the proposed RTP 2021 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

On September 25, 2014, Assembly Bill No. 52 was signed into law which requires lead agencies to consult with affected tribal entities during the environmental review process and that tribal cultural resources be separated from paleontological resources during environmental analysis. However, this consultation process only applies to new CEQA processes and as such is not required for this Addendum. In September 2016, changes to the CEQA guidelines went into effect that added tribal cultural resources to Appendix G. Section XVIII of Appendix G asks the following:

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or;
- b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

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. Updates to the Tribal Transportation element include three new policies: 1) Support formation of a tribal joint powers authority to apply for a seat on the HCAOG Board, 2) Support for Caltrans' initiative to re-name discriminatory transportation assets, and 3) Support for legislation to amend the Streets and Highways Code (SHC-94) to remove the limited waiver of sovereign immunity, which has proven to be a barrier to execute contracts on tribal lands.

Additionally, the new Renewing Our Communities chapter includes the following equity policy and actions:

POLICY EQUITY-1 Land Acknowledgement:

- HCAOG benefits from using office space and Board meeting space in Eureka, which is unceded ancestral land of the Wiyot. HCAOG will work to secure a stable funding source with which to contribute to the voluntary Wiyot Honor Tax in order to monetarily compensate the Wiyot Tribe for this benefit. If HCAOG cannot access any governmental fund that allows this type of expenditure, HCAOG will advocate for policy that creates funds that allow this as an eligible use.
- Begin HCAOG Board meetings and workshops with a verbal indigenous-land acknowledgement.

The policies and projects included as part of the RTP 2021 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 2021 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

Senate Bill No. 1241, filed with the Secretary of State on September 13, 2012, covered a range of topics related to fire hazards. Part of the bill required updates to CEQA in order to address fire hazard impacts for projects in state responsibility areas and very high fire hazard severity zones. In response to this, CEQA Guidelines Appendix G was updated in December 2018 to include Section XX: Wildfire which as of 2021 asks:

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

- a) Substantially impair an adopted emergency response plan or emergency evacuation plan?
- b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
- c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?
- d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Potential project effects regarding wildfires were not assessed as part of the 2013/14 FEIR or the 2017 Addendum. As such, a brief analysis is provided below.

Humboldt County Wildfire Fire Hazards Overview

Humboldt County exhibits extreme diversity in its potential for destructive wildland fire, ranging in severity classification from nil to very high based on the wildfire hazard severity zone map prepared by CALFIRE. The map generally reflects a moderate to high rating on the western portions of the County where the fuel potential is high but the climate is damp. The very high ratings are generally in the drier, eastern portions of the County or in very steep terrain. The areas not prone to fire risk are concentrated in coastal and estuary lands (County of Humboldt, 2017a). The “2013 Humboldt County Community Wildfire Protection Plan” updated the “2006 Master Fire Protection Plan,” and provides a risk assessment of fire related hazards within the County.

The State Responsibility Area (SRA) is defined in California Public Resources Code §4125 – 4127 as lands in which the financial responsibility for preventing and suppressing wildland fire resides with the state. In general, SRA lands contain trees producing, or capable of producing, forest products; timber, brush, undergrowth, grass, whether of commercial value or not, which provide watershed protection for irrigation or for domestic or industrial use; or lands in areas which are principally used, or are useful for, range or forage purposes. Preventing and suppressing fires is the responsibility of the state within SRA. Approximately 71 percent of Humboldt County is classified as SRA, 26 percent is federal responsibility area (land managed by the federal government, such as Six Rivers National Forest, or tribal land), and 3 percent is local responsibility area. Local responsibility areas include all incorporated cities as well as the Eel River bottoms and bottom lands within the greater Humboldt Bay area (County of Humboldt, 2017a).

Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

As proposed, the projects and polices included in the RTP 2021 update are geared towards increasing mobility throughout the County by improving transportation corridors and providing additional transportation options for area residents. This includes improving transportation options for all individuals in the event of emergency evacuations. The RTP 2021 Emergency Transportation Element includes goals and polices to improve emergency preparedness such as:

Policy Emergency-1: HACOg will support and collaborate in reviewing and updating emergency plans to address transportation resources available in all phases of disasters; prevention, preparedness, response, recovery, and mitigation.

Policy Emergency-4: HCAOG supports region-wide, multi-agency planning, training, and equipment acquisition for emergency preparedness and resiliency. HCAOG and the public transit operators should work with the County Office of Emergency Services to develop a collaborative, effective role in disaster preparedness and response.

Based on the inclusion of these policies and the proposed improvements to regional transportation networks that would aid in area preparedness and resiliency in the event of emergency situations, there would be **no impact** to any emergency response plan or emergency evacuation plan.

Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

The proposed projects and policies are focused on area transportation networks in previously developed areas and do not include housing or other development projects that may be subject to wildfire risks. As such, there will be **no impact** that would exacerbate wildfire risks due to slope, prevailing winds, or other factors.

Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

The RTP 2021 update includes projects and policies aimed at revitalizing current infrastructure and improving transportation networks throughout the County. While the majority of these projects will not involve installation of infrastructure that may exacerbate wildfire, a proposed new hydrogen fueling station located in Eureka may have associated fire risks. The Humboldt Transit Authority (HTA), in an effort to promote alternative sources of fuel, is proposing to use hydrogen-powered buses for some of its regular transit routes. This would require installing a hydrogen fueling station at the main maintenance yard located at 2137 2nd Street in Eureka. HTA stores other fuels at this site, including gasoline and propane which are equally as dangerous as hydrogen fuel. Research has shown that even “large hydrogen releases in refueling areas... did not generate hydrogen flames that are likely to spread to flammable materials” (USDOT 2010). Additionally, as the yard is located in a developed area of downtown Eureka in proximity to Humboldt Bay, it is unlikely that a fire originating at this location would lead to wildfire. As such, impacts to wildfire from the use of hydrogen fueling and hydrogen fueled busses are expected to be less than significant.

Due to the nature of the policies and projects included as part of the RTP 2021 update, impacts related to installation and maintenance of infrastructure that may exacerbate fire risks or that may result in temporary or ongoing impacts to the environment will be **less than significant**.

Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

The projects and policies included in the RTP 2021 update primarily relate to rehabilitating existing transportation infrastructure or acquiring zero emission vehicles for public transportation and government use. Any construction projects that take place as a result of the RTP 2021 update must adhere to current construction practices related to stormwater and slope stability. While each project will undergo separate permitting and likely additional environmental review, based on current best management practices and already developed nature of project areas, impacts that may expose people or structures to significant risks from downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes will be **less than significant**.

Based on the above analysis the changes in the proposed RTP 2021 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 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 2021 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 2021 Update would not result in new significant environmental impacts not previously evaluated in the FEIR.

The changes in the proposed RTP 2021 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

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 2021 RTP Update. Therefore, the impacts introduced as a result of the RTP do not meet the standards for a subsequent or supplemental EIR pursuant to CEQA Guidelines Section 15162.

The significance determinations reported in the CEQA Checklist section of the Initial Study have not changed for the applicable topics. Likewise, the significance determinations and the Mitigation and Monitoring Program identified in the Final EIR have not changed.

REFERENCES

CITATIONS

AEP 2021 (Association of Environmental Professionals) CEQA Portal Topic Paper “*Subsequent and Supplemental EIRs and Streamlining*” July 2021.

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CARB 2017 (California Air Resources Board) *California’s 2017 Climate Change Scoping Plan: The strategy for achieving California’s 2030 greenhouse gas target*. November 2017.

CDFW 2021 California Natural Diversity Database (CNDDDB) “State and Federally Listed Endangered, Threatened, and Rare Plants of California—Last updated October 2021.”

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IPCC 2021 (Intergovernmental Panel on Climate Change) *Climate Change 2021: The Physical Science Basis*. August 7, 2021.

NCAQMD 2021 “Air Quality Planning & CEQA” webpage. <https://ncaqmd.org/index.php?page=aqplanning.ceqa>, accessed September 30, 2021.

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