

APPENDIX B

Addendum to the Final Environmental Impact Report

Prepared for the Humboldt Regional Transportation Plan 2013-14 Update

VROOM...Regional Transportation Plan 2017 Update
Humboldt County Association of Governments

ADDENDUM
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 of 1968, 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...2017* updates the version that HCAOG updated in 2013-2014 (and adopted in August 2014). In conjunction with the 2014 update, HCAOG certified the Final Environmental Impact Report (EIR) in July 2014 (State Clearinghouse #2013102063). HCAOG has assessed the potential environmental impacts of the 2017 update of the RTP *VROOM...*, and has documented the assessment and findings in an addendum 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 substantial change to the environmental impacts as analyzed in the

Section 15162: When a Subsequent EIR is Required

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 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.

previously certified EIR. (Or, more technically, an addendum “can be used where there is no substantial evidence that the modification would result in a new or substantially more severe impact” (AEP 2017).)

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 are minor with no change in scope and they 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) based on changes proposed to the RTP “VROOM...” as part of the 2017 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 2017 update proposes policies and actions essentially identical in scope and intent as that envisioned in the FEIR. The proposed RTP update will not result in more significant impacts; no changes to and no new mitigation measures are required.

The proposed plan, as updated, (1) is not anticipated to result in new significant impacts; 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 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 during 2013-2014. Before adopting VROOM in August 2014, the HCAOG Board certified the Final Program EIR in July 2014 (State Clearinghouse #2013102063).

For the 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

as well as Growth-Inducing Impacts and Irreversible Effects.

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 their proposed project 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 2017 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 2017 update. These sponsor (or implementing) agencies would include the cities within Humboldt County as well as Humboldt County, Caltrans, and public transit agencies. In sponsoring individual projects, local 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 this 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 and the 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 (the Addendum reviews only those projects that are newly proposed in the 2017 update; it does not duplicate the FEIR’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, 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, including any Caltrans or Harbor District related projects.

PROJECT DESCRIPTION: REGIONAL TRANSPORTATION PLAN 2017 UPDATE

The proposed project is the update of the Regional Transportation Plan (RTP) for Humboldt County, uniquely referred to as “VROOM...” (for *Variety in Rural Options of Mobility*). The RTP 2017 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 2017 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 August 2014 (also called VROOM...).

The Humboldt regional transportation system includes, but is not be 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 (rail, truck, 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). As well, “VROOM...” covers provisions for land use and transportation connections, emergency transportation coordination, air quality, 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 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.

As described in the 2014 FEIR:

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 (FEIR pages ES-1, ES-2.)

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

New policies that the 2017 update proposes to add to the RTP are:

2. Complete Streets Element

Policy CS-8 HCAOG will accelerate programming for regional projects that retrofit existing roads to provide safe and convenient travel by all users.

Policy CS-9 HCAOG supports a “fix it first” priority of protecting and preserving what we have first when allocating resources to roadways and other transportation assets.

Policy CS-13 HCAOG shall pursue efforts to increase shared mobility options in the region such as car share and bike share programs. HCAOG shall work to make shared mobility programs equitably available to people with low-incomes and other transportation disadvantages.

Policy CS-15 HCAOG supports roadway design standards that increase bicyclist and pedestrian safety and will work with local jurisdictions to help implement innovative designs and engineering projects that have been shown to improve bicyclist and pedestrian safety.

3. Commuter Trails Element

Policy Trails-3 HCAOG shall pursue and support using existing public right-of-way for trails to the maximum extent feasible in order to preserve land, assets, and financial resources.

Policy Trails-7 The regional trails network shall provide travel options for residents and visitors, with equitable access for transportation-disadvantaged populations.

4. Tribal Transportation Element

No new policies proposed.

5. Public Transportation Element

Policy PT-6 HCAOG encourages transit providers to promote and accommodate bicycles on transit vehicles, and to provide secure bicycle parking facilities at transit stops and transportation centers. {formerly Policy 1.4 in the adopted *Regional Bike Plan 2012*}

6. Aviation Element

Policy AS-6 HCAOG supports improving ground access to airports in order to enhance passenger, air cargo, and general aviation airport opportunities. (Consistent with California State Aviation Plan–Policy MB-3.)

7. Goods Movement

Policy GM-11 (Goods Movement) HCAOG shall support projects that improve intermodal freight access and reduce congestion, especially along freight corridors. {*California Transportation Plan 2040*}

8. Emergency Transportation

No new policies proposed.

9. Financial Element

Not applicable.

10. Global Climate Crisis Element *(New element)*

Policy C-1: Put forth strategies that shift travel to be more transit-focused and rideshare-oriented, to achieve more road safety benefits. *(CTP 2040 recommended policy)*

Policy C-2 Promote active transportation, ridesharing, rail, and public/mass transit promoting policies for the co-benefit of reducing air pollution when they replace motor vehicle trips. *(CTP 2040 recommended policy)*

Policy C-3 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, and Local Coastal Programs. *(CTP 2040 recommended policy)*

Policy C-4 HCAOG will support and plan transportation and projects that provide safe and convenient travel modes for people who cannot or choose not to drive.

Policy C-5 HCAOG will promote and support land use policies that accommodate or reinforce planning, designing, and building a truly multimodal transportation network.

Policy C-6 HCAOG shall encourage partnerships to develop adaptation strategies that address sea-level rise in Humboldt County.

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

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 aviation projects proposed in the Aviation Element.

There are no new projects proposed for the Action Plans of the Emergency Transportation Element, Tribal Transportation Element, or Goods Movement Element.

Table *Projects-1* **New Complete Streets Projects Proposed in the HCAOG RTP 2017 Update**

Jurisdiction	Location	Project Description
Blue Lake	Railroad Ave from Greenwood Ave to Hatchery Road	Overlay and pedestrian improvements, rehab and reconstruction

Jurisdiction	Location	Project Description
Blue Lake	First Ave from Greenwood Ave to I Street	Rehabilitation and reconstruction with pedestrian improvements
Eureka	Henderson St from I St to Fairfield St	Road rehabilitation, ADA, bike lanes, bus pullouts, storm drains
Eureka	Fairway Dr from City limits to Ridgecrest Drive; Campton Road from City limits to Oak St	Road rehabilitation, ADA, bicycle facility
Eureka	H & I Street Corridors	Road rehab, ADA, bicycle facility and bus pullouts
Fortuna	U.S. 101/12th Street Northern Interchange Improvements, Onramps, Dinsmore Drive	Reconfigure interchange to include roundabout and bike/pedestrian facilities
Fortuna	U.S. 101/Riverwalk Drive Southern Interchange Improvements	Reconfigure interchange to include roundabout and bike/pedestrian facilities mand.
Fortuna	U.S. 101/Kenmar Road Interchange Improvements	Reconfigure interchange to add two roundabouts and bike/pedestrian facilities
Fortuna	South Fortuna Boulevard/Ross Hill Road/Kenmar Road	Pedestrian improvements including adding sidewalk, bike lane and retaining wall
Fortuna	Thelma and Ross Hill Road	Install roundabout
Fortuna	Newburg Road, Lawndale Drive, Summer Street, 2 nd Ave, Orchard Lane	New sidewalk, bike lanes and school entry improvements
Fortuna	Various Locations – Riverwalk Drive, Fortuna Boulevard, Rohnerville Road	Strongs Creek Trail Phase 1 – Class I bike lane through Fortuna and Class II bike lanes on City streets
Caltrans	101 – In Eureka from Elk River Bridge to Pierson/Tetrault signal	Eureka South Entry Gateway Project

Table *Projects-2* **New Regional Commuter Trail Projects Proposed in the HCAOG RTP 2017 Update**

Jurisdiction	Trail Project	Project Description
Eureka	Eureka Loop Trail	Multipurpose trail connecting the north and south ends of the Eureka Waterfront Trail to key destinations in Greater Eureka Area.

Table *Projects-3* **New Regional Projects for Public Transportation Proposed in the HCAOG RTP 2017 Update**

Operator/Agency	Location	Project Description
HTA	HTA Maintenance Yard, Eureka	Bus parking restructuring
HTA	HTA Maintenance Yard, Eureka	Additional maintenance bays
HTA	HTA Maintenance Yard, Eureka	Solar photovoltaic system
K-T Net	Increased frequency	

Table *Projects-4* **New Regional Aviation Projects Proposed in the HCAOG RTP 2017 Update**

Lead Agency	Airport	Project Description
County of Humboldt	Redwood Coast Airport	Air Freight Needs Assessment (to study Redwood Coast, Murray Field, and Rohnerville Airports)
County of Humboldt	Redwood Coast Airport	Obstruction Mitigation Plan
County of Humboldt	Redwood Coast Airport	Obstruction Removal
County of Humboldt	Redwood Coast Airport	Pavement Maintenance Management Plan
County of Humboldt	Redwood Coast Airport	Phase 4 ARFF – Construct ARFF Building

Lead Agency	Airport	Project Description
County of Humboldt	Redwood Coast Airport	Taxiways B&G Drainage Improvements
Hoopla Valley Tribe	Hoopla Airport	Taxiway extension to runway
County of Humboldt	Murray Field Airport	Air Freight Needs Assessment— <i>see under Redwood Coast Airport</i>
County of Humboldt	Rohnerville Airport	Air Freight Needs Assessment— <i>see under Redwood Coast Airport</i>
SCRID No. 1	Shelter Cove Airport	Airport Land Use Plan Update
SCRID No. 1	Shelter Cove Airport	Improve drainage – southeast tiedown area
SCRID No. 1	Shelter Cove Airport	Pilots’ lounge
SCRID No. 1	Shelter Cove Airport	Slurry seal taxiway/miscellaneous pavement
SCRID No. 1	Shelter Cove Airport	Taxiway realignment
SCRID No. 1	Shelter Cove Airport	Taxiway realignment planning
SCRID No. 1	Shelter Cove Airport	Tiedown area paving, southeast and northwest tiedown
City of Eureka	Samoa Field (formerly Eureka Municipal)	Remove/prune willow stand
City of Eureka	Samoa Field (formerly Eureka Municipal)	Construct security fencing

IMPACTS ASSESSMENT

As summarized above, the update to the RTP consists of some new policies, updated Action Plans, and a new Global Climate Crisis element. The Action Plans consist of project lists provided by each HCAOG member entity and Technical Advisory Committee members. The project lists are similar to those in the 2014 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 2017 update.

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

For the proposed project, the RTP 2017 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 2017 update:

- 1) have not changed the nature or scale of the Regional Transportation Plan; and
- 2) 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 Initial Study Checklist: With the FEIR mitigation and monitoring program incorporated, the proposed RTP 2017 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.

Because the nature and scope of the projects proposed in the RTP 2017 update has not 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, greenhouse gas emission and climate change, or transportation/circulation**, but below we summarize pertinent updates that have occurred in the past four years in order to reflect current developments including changes to local, state, and federal regulations, and changes to environmental data.

AIR QUALITY

Humboldt County is within the North Coast Air Basin and falls under the management of the North Coast Unified Air Quality Management District (NCUAQMD). As stated in the 2014 FEIR, as well as currently on the NCUAQMD website, “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” in Humboldt County only, and “(t)he District has not exceeded (i.e., violated) the federal annual standard for particulate matter during the last five year period” (NCUAQMD 2017) (PM10 is particulate matter with a diameter of 10 micrometers or less.)

Below are current revisions and corrections to the FEIR table.

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

Pollutant	Federal Standard*	California Standard*
Ozone	0.075 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) 0.04 ppm (24-hr avg)

	0.14 ppm (24-hr avg)	
Lead	4.5 µg/m³ (calendar quarter)	0.15 µg/m³ (3-month avg)
	<u>0.15 µg/m³ (rolling 3-month avg)</u>	<u>1.5 µg/m³ (30-day avg)</u>
Particulate Matter (PM ₁₀)	150 µg/m ³ (24-hr avg)	50 µg/m ³ (24-hr avg)
		20 µg/m ³ (annual avg)
Particulate Matter (PM _{2.5})	35 µg/m ³ (24-hr avg)	
	12 µg/m ³ (annual avg)	12 µg/m ³ (annual avg)

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

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

Source: California Air Resources Board (5/4/16), www.arb.ca.gov/research/aaqs/aaqs2.pdf, Sept. 12, 2017.

The minor changes in the proposed RTP 2017 update:

- 1) have not changed the nature or scale of the Regional Transportation Plan; and
- 2) 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 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 (CNDDB) 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 summarize updates to listed special status species since 2014, and discuss how new species that were not listed in the FEIR might be impacted, if at all, by the implementation of the proposed RT 2017 update. We have also noted revisions to information in the FEIR tables, which are minor yet pertinent.

□ Birds

- White-tailed kites (*Elanus leucurus*) are fully protected under California Fish and Game Code. They are a nesting raptor species, known to nest within Humboldt County, including recent records of nests near Eureka (CDFW 2017a). Suitable habitat is: Cismontane woodland, marsh and swamp, riparian woodland, valley and foothill grassland, and wetlands. Rolling foothills and valley margins with scattered oaks and river bottomlands or marshes next to deciduous woodland. Open grasslands, meadows, or marshes for foraging close to isolated, dense-topped trees for nesting and perching (County of Humboldt 2017).

Most (recorded) observations in Humboldt County have been near the coast, concentrated near Humboldt Bay and the Eel and Mad Rivers (ibid).

The new proposed projects in the RTP 2017 update are not located in riparian woodlands, river bottomlands, wetlands, marshes or other areas of suitable habitat, nor areas where the white-tailed kites’ nest have been observed in Humboldt County. Therefore, impacts would be less than significant and no new mitigation is required.

□ **Reptiles & Amphibians**

- The western pond turtle was listed as the scientific name *Emys marmorata*, whereas the CNDDDB 2017 lists it under the scientific name *Actinemys marmorata* (CDFW 2017a).
- The Del Norte salamander (*Plethodon elongatus*) was listed as a CDFW Species of Special Concern (no formal protection other than CEQA consideration) and is not currently listed (State or federal) (ibid).

□ **Mammals**

- The fisher–West Coast DPS was listed as the scientific name *Martes pennant*, whereas the CNDDDB 2017 lists *Pekania pennant*.
- Although not a special-status species, Roosevelt elk (*Cervus canadensis roosevelti*) are identified as a sensitive resource in the Humboldt County General Plan and under County Code (Section 313-20.1). Suitable habitat for Roosevelt elk includes deciduous and conifer forests, riparian areas, and meadows; within Humboldt County they primarily limit their habitat and range to within Redwood National and State Park (from Freshwater Lagoon to the Klamath River) (County of Humboldt, 2017). Because most of the Roosevelt elk’s range is outside of project areas proposed in the RTP 2017 update, impacts would be less than significant and mitigation is not required.

□ **Plants**

- Two plant species that the FEIR did not list but the *Humboldt County General Plan Update’s Revised Draft EIR* identified as likely to occur in Humboldt County are: the McDonald’s rockcress (*Arabis mcdonaldiana*) which has federal and state protection as an endangered species; and water howellia (*Howellia aquatilis*), which has federal protected status as a threatened species (CDFW 2017b).
- Table *Bio-1* shows plant species of special concern. They are not formally listed at the State or federal level (i.e. not legally protected under the national Endangered Species Act (ESA) or California ESA), but are legally protected to be considered under CEQA.

Table *Bio-1*. **California Rare Plant Species Known or with Potential to Occur in Humboldt County**

Scientific Name	Common Name	Rare Plant Rank ¹
<i>Anisocarpus scabridus</i>	scabrid alpine tarplant	3
<i>Arctostaphylos manzanita</i> ssp. <i>elegans</i>	Konocti manzanita	3
<i>Buxbaumia viridis</i>	buxbaumia moss	2
<i>Calycadenia micrantha</i>	small-flowered calycadenia	2
<i>Castilleja ambigua</i> var. <i>humboldtiensis</i>	Humboldt Bay owl’s-clover (Note: in the FEIR listed as johnny-nip)	2
<i>Lasthenia californica</i> ssp. <i>macrantha</i>	perennial goldfields	2
<i>Ramalina thrausta</i>	angel’s hair lichen	1
<i>Sidalcea oregana</i> spp. <i>eximia</i>	coast checkerbloom	1b
<i>Vaccinium scoparium</i>	little-leaved huckleberry	2

¹0.1–Seriously threatened in California (over 80% of occurrences threatened; high degree and immediacy of threat)

0.2–Moderately threatened in California (20-80% occurrences threatened; moderate degree and immediacy of threat)

0.3–Not very threatened in California (less than 20% of occurrences threatened; low degree and immediacy of threat or no current threats known)

Sources: County of Humboldt, 2017 (citing CNDDB 2017, CNPS 2017, Calflora 2017).

The FEIR identified the coast sidalcea (*sidalcea oregana* spp. *eximia*) as a Special Status Plant (1b.2 plant). Its common name is coast checkerbloom and it is rare, threatened, or endangered in California and elsewhere. It is worth noting here that it grows at the Redwood Coast Airport (Arcata-Eureka Airport), being relatively common in the airport’s grassy areas that are regularly mowed. Survey maps, from 2009 and 2010 surveys at the airport, are provided from the California Department of Fish and Wildlife (Eureka office) (see Figures *Bio-1* and *Bio-2* below). The RTP 2017 update proposes projects that could potentially affect this habitat area, such as constructing runway lighting improvements. The County’s Public Works Department, which includes the Aviation Division, is aware of the plant’s status and presence, and has in the past coordinated with CDFW and USFWS. The biological resources mitigation measures outlined in the FEIR shall serve to further reduce potential environmental impacts to less than significant.



Photo credits: CDFW-Eureka Office

Coast Checkerbloom (*sidalcea oregana* spp. *eximia*) at the Arcata-Eureka Airport

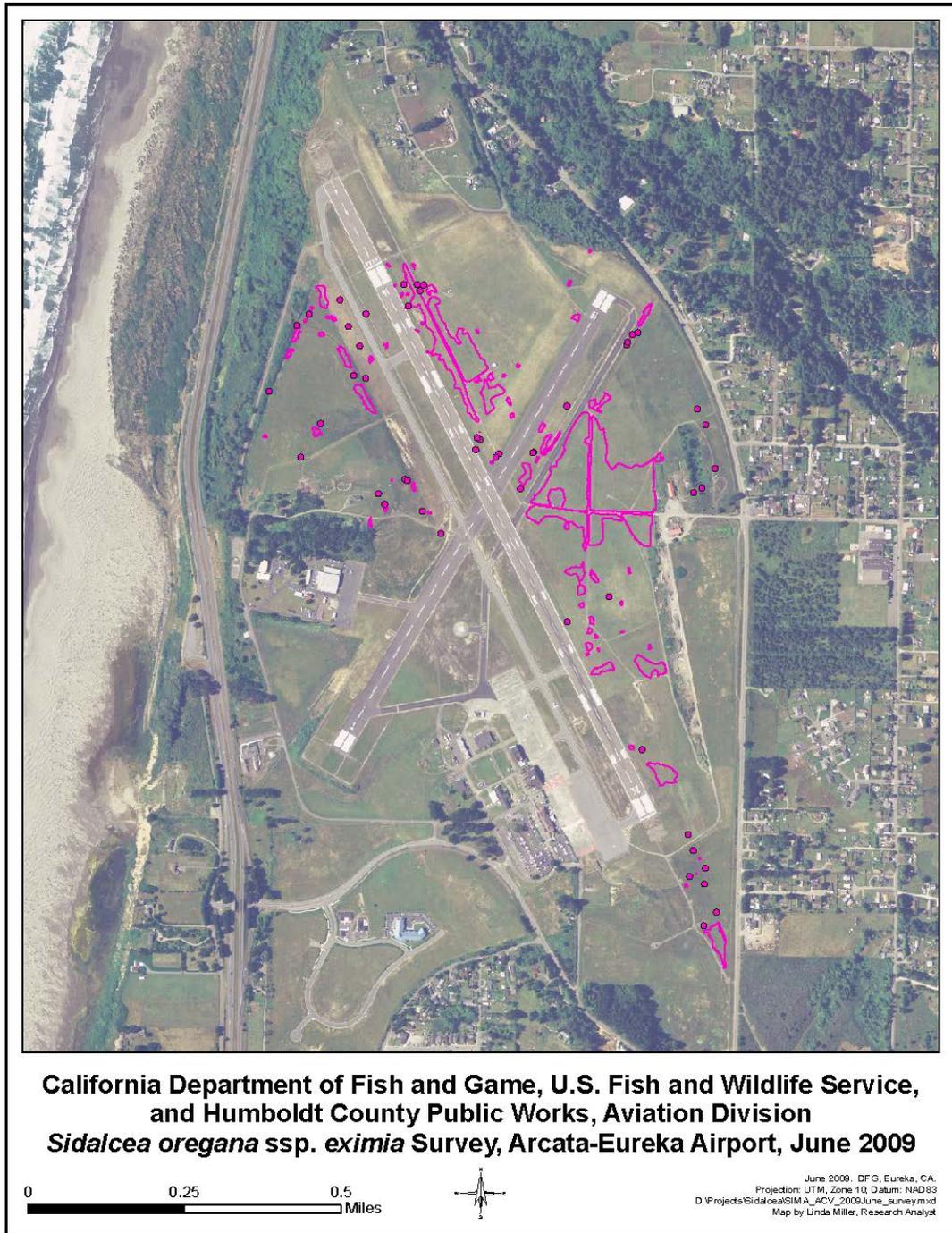


Figure Bio-1. Survey of Coast Checkerbloom (*sidalcea oregana* spp. *eximia*) at the Arcata-Eureka Airport, 2009



Figure Bio-2. Survey of Coast Checkerbloom (*Sidalcea oregana* spp. *eximia*) at the Arcata-Eureka Airport, 2010

The minor changes in the proposed RTP 2017 update:

- 1) have not changed the nature or scale of the Regional Transportation Plan; and
- 2) 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.**

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.

To comply with California's climate bills, State agencies must take climate change into account for planning and investment decisions. Foremost among State agencies, the Air Resources Board (CARB) must develop strategies to reduce GHG emissions, which they did most recently in the draft *2017 Climate Change Scoping Plan Update—The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target* (CARB January 20, 2017; not yet finalized/adopted). 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 2000-2015," 2017 edition, offers updated data from what was available in 2014. In it, the California Air Resources Board (CARB) reports:

- In 2015, statewide emissions of CO₂ from routine emitting activities declined 1.5 million metric tons of CO₂ equivalent (MMTCO₂e) from 2014 levels; statewide emissions have decreased overall by 10% since peak levels in 2004.
- The transportation sector remains the largest source of GHG emissions in the state, accounting for 37% of the inventory, and had an increase in emissions in 2015.
- Emissions from transportation sources were relatively constant through 2007, declined through 2013, then increased by 4.6 MMTCO₂e (or 3%) from 2014 to 2015.
- Emissions from the electric power sector comprise 19% of 2015 statewide GHG emissions (5.2% decline in 2015 compared to 2014). Emissions from the electricity sector continue to decline due to growing zero-GHG energy generation sources.
- Emissions from the remaining sectors have remained relatively constant. (CARB 2017)

The Intergovernmental Panel on Climate Change's (IPCC's) *Fifth Assessment Report* 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:

The increase of global mean surface temperature by the end of the 21st century (2081–2100) relative to 1986–2005 is likely to be 0.3°C to 1.7°C under a stringent mitigation scenario; 1.1°C to 2.6°C or 1.4°C to 3.1°C under two respective intermediate scenarios; and 2.6°C to 4.8°C under very high GHG emissions. The Arctic region will continue to warm more rapidly than the global mean (“Climate Change 2014 Synthesis Report Summary for Policymakers,” IPCC 2014).

Other summary points from the *IPCC Fifth Assessment Report* are:

- The evidence for human influence on the climate system has grown since the IPCC Fourth Assessment Report.
- Over the period 1901 to 2010, global mean sea level rose by 0.19 [0.17 to 0.21] m. The rate of sea level rise since the mid-19th century has been larger than the mean rate during the previous two millennia (high confidence).
- Total anthropogenic GHG emissions have continued to increase over 1970 to 2010 with larger absolute increases between 2000 and 2010, despite a growing number of climate change mitigation policies.
- Emissions of CO₂ from fossil fuel combustion and industrial processes contributed about 78% of the total GHG emissions increase from 1970 to 2010, with a similar percentage contribution for the increase during the period 2000 to 2010 (high confidence) (ibid).

As noted in the 2014 FEIR, the City of Arcata has an adopted “Community Greenhouse Gas Reduction Plan” (August 2006), and the County of Humboldt has a “Climate Action Plan,” (January 2012). Other recent local planning includes:

- The Blue Lake Rancheria has set the goal to reach full energy self-sufficiency and reduce greenhouse gas emissions to zero. Since 2002, the Tribe has cut energy consumption by 35 percent, with associated drops in emissions. The Tribe has set a target to reduce GHG emissions by another 40 percent by 2018.
- The City of Blue Lake adopted a “Climate Action Plan” in August, 2014.
- The City of Eureka has developed a “Sea Level Rise Adaptation Planning Report” (December 2016)
- The City of Trinidad, in addition to its Climate Action Plan (2010), developed the “2016 Climate Change Vulnerability Report and Adaptation Response” (April 2016) as part of its Local Coastal Program Update Project (in process).
- Humboldt State University (Office of Sustainability) developed a *Climate Action Plan*, issued on December 12, 2016.

And in HCAOG’s RTP, the 2017 update included a new “Global Climate Crisis Element,” which adds new focused policies to promote and support strategies to reduce transportation-related GHG emissions. The policies are:

Policy C-1. Put forth strategies that shift travel to be more transit-focused and rideshare-oriented, to achieve more road safety benefits. (*CTP 2040 recommended policy*)

Policy C-2. Promote active transportation, ridesharing, rail, and public/mass transit promoting policies for the co-benefit of reducing air pollution when they replace motor vehicle trips. *(CTP 2040 recommended policy)*

Policy C-3. 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, and Local Coastal Programs. *(CTP 2040 recommended policy)*

Policy C-4. HCAOG will support and plan transportation and projects that provide safe and convenient travel modes for people who cannot or choose not to drive.

Policy C-5. HCAOG will promote and support land use policies that accommodate or reinforce planning, designing, and building a truly multimodal transportation network.

Policy C-6. HCAOG shall encourage partnerships to develop adaptation strategies that address sea-level rise in Humboldt County.

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 changes in the proposed RTP 2017 update:

- 1) have not changed the nature or scale of the Regional Transportation Plan; and
- 2) 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 criteria for analyzing transportation impacts, as it relates to complying with CEQA, is going through major shifts on account of the passage, in September 2013, of Senate Bill 743 (Steinberg). Senate Bill 743 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). In 2016, the Governor's Office of Planning and Research released a proposal of revised CEQA Guidelines, in which they state,

Legislative findings in that bill plainly state that California's foundational environmental law can no longer treat vibrant communities, transit and active transportation options as adverse environmental outcomes. On the contrary, aspects of project location and design that influence travel choices, and thereby improve or degrade our air quality, safety, and health, must be considered (OPR 2016).

OPR recommends that vehicle miles traveled (VMT) per capita and VMT per employee be used as the new metrics for analyzing transportation impacts under CEQA. OPR also acknowledges that:

- some variation in *thresholds* may be appropriate in different parts of regions and the state; for example, (i) outside of central urban locations it may be appropriate to refer to a city's

average, or (ii) within unincorporated county areas it may be appropriate to reference the average of the cities in the county. (CEQA Guidelines § 15064(b))

- VMT data is not available at the same level in all areas of the State, but that statewide data on VMT are available statewide. “For example, the California Statewide Travel Demand Model provides data on vehicle miles traveled throughout the state which can be used both for setting thresholds and for estimating VMT resulting from a proposed project” (ibid). The adequacy of any analysis “is to be reviewed in the light of what is reasonably feasible” (CEQA Guidelines § 15151).

The proposed changes must be finalized by the Natural Resources Agency, through the “rulemaking” process, before they go into effect—which is generally expected to occur in 2018. OPR has recommended that the new procedures remain optional for two years after formal rulemaking, to give agencies who want it “more time to become acquainted with the new procedures” (ibid).

Because the proscribed CEQA criteria per SB 743 is not yet in effect, for the time being agencies can use LOS as a threshold to determine transportation impacts and still be in compliance with CEQA. Nonetheless, 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 2017 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 2017 update includes new proposed projects, as well as deletes some projects because they have been accomplished (mostly in the Complete Streets Element). The new proposed projects do not change the overall scope or nature of projects as adopted in the 2013/14 RTP (See 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 2017 update:

- 1) have not changed the nature or scale of the Regional Transportation Plan; and
- 2) 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.**

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, expending 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 2017 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). No new projects are proposed that would expand transportation access into undeveloped areas. The RTP 2017 Update would not result in new significant environmental impacts not previously evaluated in the FEIR.

The changes in the proposed RTP 2017 update:

- 1) have not changed the nature or scale of the Regional Transportation Plan; and
- 2) 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 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 2017** (Association of Environmental Professionals) “AEP 2017 Advanced CEQA Workshop” booklet.
- CARB 2017** (California Air Resources Board) “California Greenhouse Gas Inventory 2000-2015,” 2017 edition. (Version June 6, 2017). (www.arb.ca.gov/cc/inventory/pubs/reports/2000_2015/ghg_inventory_trends_00-15.pdf, accessed September 12, 2017).
- CDFW 2017a** (California Department of Fish and Wildlife) California Natural Diversity Database (CNDDDB), “Special Animals List” (July 2017).
- CDFW 2017b** California Natural Diversity Database (CNDDDB) “State and Federally Listed Endangered, Threatened, and Rare Plants of California—Last updated July 2017.”
- CTC 2017** (California Transportation Commission) *Regional Transportation Plan Guidelines for Regional Transportation Planning Agencies*. (Adopted January 18, 2017)
- County of Humboldt 2017** *Amendments to Humboldt County Code Regulating Commercial Cannabis Activities Project Draft EIR* (State Clearinghouse Number 2017042022). Prepared for the County of Humboldt by Ascent Environmental (September 2017).
- NCUAQMD 2017** “Air Quality Planning & CEQA” webpage. www.ncuaqmd.org/index.php?page=aqplanning.ceqa#T1, accessed September 12, 2017.
- OPR 2016** (Governor’s Office of Planning and Research) *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA: Implementing Senate Bill 743* (Steinberg, 2013). (January 20, 2016)
- U.S. FWS 2017** (Fish and Wildlife Service) ECOS Environmental Conservation Online System, Listed Animals. <https://ecos.fws.gov/ecp/>, accessed September 15, 2017.

RESOURCES

Coyote Campus Project Addendum to FEIR: Gavilan Joint Community College District 1. January 2015