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5 EIR Alternatives

5.1 Introduction

Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15126.6, this chapter contains a comparative impact assessment of alternatives to the proposed plan. The primary purpose of an alternatives analysis under CEQA is to provide decision-makers and the public with a reasonable range of feasible alternatives to the proposed plan that could attain most of the basic plan's objectives, while avoiding or reducing any of the plan's significant adverse environmental effects.

Analysis of three alternatives to the proposed plan is provided for informational purposes and to allow decision-makers to consider the proposed plan in light of hypothetical alternative planning scenarios, thereby promoting CEQA's purpose as an information disclosure statute. This analysis is guided by the following considerations set forth under CEQA Guidelines Section 15126.6:

- An EIR need not consider every conceivable alternative to a plan or project;
- An EIR should identify alternatives that were considered by the lead agency, but rejected as infeasible during the scoping process;
- Reasons for rejecting an alternative include:
 - Failure to meet most of the basic plan or project objectives;
 - Infeasibility; or
 - Inability to avoid significant environmental effects.

In addition to these considerations, the County considered public EIR scoping comments received as part of the alternatives development process. Appendix A includes all comments received during the scoping period. Several commenters suggested that the RCAP should consider more aggressive options to decrease vehicle miles traveled (VMT), such as by requiring individual cities to adopt ordinances related to complete streets, parking, and zoning and by including actions to increase transit funding availability. In consideration of these comments, the Sustainable Communities Alternative (Alternative 2) is assessed herein. Commenters also pointed out that Humboldt's vast forested areas present important opportunities for carbon sequestration and that a greater accounting for and emphasis on the carbon sequestration potential of Humboldt should be included as part of the RCAP. In consideration of these comments, the Carbon Sequestration Alternative (Alternative 3) is assessed herein.

The implementation of the proposed plan was analyzed for potentially significant impacts related to each of the environmental issues discussed in Sections 3.1 through 3.10. The results of the analysis indicate that the proposed plan would result in the following significant and unavoidable impacts:

- **Aesthetics**: operation-related impacts to scenic vistas, scenic resources within State scenic highways, and visual character or quality of public views
- **Air Quality**: construction-related criteria air pollutant generation
- **Biological, Agriculture, and Forestry Resources**: construction- and operation-related impacts to special-status species, construction-related impacts to wildlife movement corridors and nursery sites, and construction- and operation-related impacts to Farmland

- **Cultural and Tribal Cultural Resources:** construction-related impacts to historical resources
- **Noise:** construction-related noise and operation-related stationary and mobile (infrastructure and public transit) noise
- **Utilities and Service Systems:** construction- and operational-related impacts due to new and expanded electric power, water, and wastewater facilities/infrastructure

Mitigation measures were identified for construction-related air quality, biological resources, historic resources, noise, and new and expanded utilities facilities/infrastructure impacts and for operational-related aesthetic, mobile (transportation) noise, stationary (infrastructure) noise, and new and expanded utilities facilities impacts; however, the identified mitigation would not reduce the impacts to less than significant. Thus, even though the proposed plan attempts to mitigate its impacts to the greatest extent feasible as required by CEQA, the mitigation is not technically feasible or sufficient to reduce impacts from significant and unavoidable.

5.2 Alternatives to the Proposed Plan

Pursuant to CEQA Guidelines Section 15126.6, this EIR presents a range of reasonable alternatives to the proposed plan for analysis and evaluation of their comparative merits. These alternatives are considered to cover the range of plan alternatives that would meet the basic objectives of the RCAP and CEQA GHG Emissions Thresholds while lessening one or more of its significant impacts. CEQA Guidelines Section 15126.6(a) states that an EIR need not evaluate every conceivable alternative. Information has been provided for each alternative that would allow meaningful comparison with the proposed plan.

The three alternatives to the proposed plan analyzed in this chapter are as follows:

- **Alternative 1:** “No Project” (i.e., no RCAP or CEQA GHG Thresholds adopted)
- **Alternative 2:** Sustainable Communities Alternative
- **Alternative 3:** Enhanced Carbon Sequestration Alternative

This EIR Alternatives analysis examines the net change from the proposed plan in terms of potential physical environmental impacts. Detailed descriptions of the alternatives are included in the impact analyses for each Alternative in Section 5.5, *Alternative 1: No Project*, through Section 5.7, *Alternative 3: Enhanced Carbon Sequestration Alternative*.

5.3 Plan Objectives

As described in Chapter 2, *Project Description*, the objectives for the RCAP and CEQA GHG Emissions Thresholds are as follows:

- Establish a coalition between jurisdictions and key organizations to guide a regional approach to climate-related challenges
- Identify strategies, measures, actions, and tracking mechanisms to serve as a qualified GHG reduction plan and provide a foundation for sustainable development efforts in the region
- Reduce communitywide GHG emissions by 40 percent below 1990 levels by 2030 (a maximum total annual emissions of 1,241,589 MT of CO₂e) in line with County and State targets
- Reduce communitywide GHG emissions to net neutral by 2045, with at least 85 percent being via GHG emissions reductions, in line with County and State targets

- Demonstrate a level of GHG emissions below which the County would have less-than-cumulatively-considerable GHG impacts for future environmental planning reviews and provide CEQA streamlining for projects via the Humboldt Regional CEQA GHG Checklist
- Strengthen the growing regional green economy
- Improve Humboldt air quality and, thus, public health

5.4 Alternative 1: No Project

The CEQA Guidelines (Section 15126.6[e]) require that the alternatives discussion include an analysis of a “No Project” Alternative. Pursuant to CEQA, the “No Project” Alternative refers to the analysis of existing conditions and what would reasonably be expected to occur in the foreseeable future if the proposed plan was not approved. This is based on current plans and consistent with available infrastructure information. In this case, the No Project Alternative examines a scenario in which the County would not approve the proposed RCAP and CEQA GHG Emissions Thresholds. Under such a scenario, the County, cities and partners within Humboldt would continue with business as usual. Each entity in Humboldt is taking steps to reduce GHG emissions. These efforts would continue, but not with the objective of achieving all the reduction goals contained within the RCAP. A number of measures outlined in the RCAP would not be achieved, new commitments and partnerships would not be facilitated, and County and City agencies would not be held accountable for reaching RCAP targets through monitoring. Therefore, Humboldt would not achieve the State’s goal of a 40 percent reduction in emissions from 1990 levels by 2030, demonstrate progress toward achieving the State’s 2045 carbon neutrality goal, or provide a mechanism for streamlining future CEQA GHG emissions impacts analyses.

The anticipated GHG emissions that would occur in accordance with the No Project Alternative are generally described in the RCAP’s legislative adjusted business as usual (ABAU) forecast, which accounts for future growth in accordance with business-as-usual conditions with adjusting for implementation of existing State laws and programs that affect emissions of GHGs. The ABAU forecast is detailed in Table 2-3 in Section 2, *Project Description*. This Alternative 1 would not provide a clear pathway for Humboldt to meet the State’s emissions reduction goals for 2030 or 2045.

5.4.1 Impact Analysis

Aesthetics

Under Alternative 1, no new utility scale renewable energy, electrical distribution, renewable fuel production, or any other infrastructure projects would be facilitated. As such, Alternative 1 would result in no impacts related to scenic vistas, scenic resources within State scenic highways, visual character or quality of public views, or light and glare.

As discussed in Section 3.1, *Aesthetics*, the proposed plan would result in significant and unavoidable impacts related to scenic vistas, scenic resources within State scenic highways, and visual character or quality of public views. The RCAP would result in less than significant impacts related to light and glare with implementation of mitigation measures. Overall, Alternative 1 would result in lesser impacts related to aesthetics compared to the proposed plan.

Air Quality

Under Alternative 1, no infrastructure projects would be facilitated that could conflict with or obstruct implementation of the applicable air quality plan and impacts would be less than significant. Likewise, no construction-related emissions of criteria air pollutants or toxic air contaminants (TACs) would occur, and Alternative 1 would result in no construction impacts related to criteria pollutants and the exposure of sensitive receptors to pollutants. Alternative 1 also would not result in the generation of additional criteria air pollutants or TAC emissions during operation, but would also not reduce these emissions, and impacts related to operational emissions would be less than significant. Alternative 1 would also result in no construction or operational impacts related to construction odors.

As discussed in Section 3.2, *Air Quality*, the proposed plan would advance the applicable air quality plans through implementation of measures that would have co-benefits to air quality and would result in less than significant impacts related to conflicts with the applicable air quality plans. Construction of future projects facilitated by the RCAP would result in significant and unavoidable construction impacts related to criteria air pollutant emissions and less than significant construction impacts related to TAC emissions and sensitive receptors with implementation of mitigation. The RCAP would also result in reduced vehicle miles traveled (VMT). As a result, long-term, operational regional criteria pollutant and TAC emissions would be reduced and the RCAP would have beneficial operational impacts related to criteria air pollutant and TAC emissions. The RCAP would result in less than significant construction and operational impacts related to odors.

In summary, while Alternative 1 would not conflict with the applicable air quality plans, it would not result in any VMT reductions or other benefits related to air quality in the region and would, therefore, result in greater air quality impacts compared to the RCAP. Alternative 1 would not involve construction activities and would result in lesser construction impacts related to criteria air pollutant emissions and TACs but would result in greater operational impacts related to these issues. Alternative 1 would also result in lesser impacts related to odors compared to the RCAP. Overall, Alternative 1 would result in greater operational impacts related to air quality compared to the proposed plan.

Biological, Agriculture, and Forestry Resources

Under Alternative 1, no new utility scale renewable energy, electrical distribution, renewable fuel production, transportation, or any other infrastructure projects would be facilitated. As such, Alternative 1 would result in no impacts related to biological, agriculture, and forestry resources.

As discussed in Section 3.3, *Biological, Agriculture, and Forestry Resources*, the proposed plan would result in significant and unavoidable impacts related to special status species, wildlife corridors and nursery sites, and Farmland. The RCAP would result in less than significant impacts related to conflicts with local biological resources policies (such as tree ordinances) and adopted habitat conservation plans. Additionally, the RCAP would result in less than significant impacts to forest land. Overall, Alternative 1 would result in lesser impacts related to biological, agriculture, and forestry resources compared to the proposed plan.

Cultural and Tribal Cultural Resources

Under Alternative 1, no new utility scale renewable energy, electrical distribution, renewable fuel production, transportation, or any other infrastructure projects would be facilitated. As such, Alternative 1 would result in no impacts related to cultural or tribal cultural resources.

As discussed in Section 3.4, *Cultural and Tribal Cultural Resources*, the RCAP would result in significant and unavoidable construction impacts related to historic resources. RCAP impacts related to archaeological resources and tribal cultural resources would be less than significant with mitigation. RCAP impacts with regard to human remains would be less than significant. For the reasons discussed above, Alternative 1 would result in lesser impacts related to cultural and tribal cultural resources compared to the proposed plan.

Greenhouse Gas Emissions and Energy

Under Alternative 1, Humboldt would not implement a comprehensive plan of measures and actions to reduce GHG emissions, and the region would not meet the State goals to reduce emissions to 40 percent below the 1990 levels by 2030 or achieve carbon neutrality by 2045. In addition, measures to increase the generation and procurement of renewably sourced electricity and renewable fuels, improve energy efficiency in buildings, decarbonize buildings, and decarbonize the transportation system would not be facilitated by the plan. Therefore, Alternative 1 impacts related to GHG emissions and energy would be significant and unavoidable.

As discussed in Section 3.5, *Greenhouse Gas Emissions and Energy*, the RCAP would result in reduced operational GHG emissions and energy use from non-renewable sources and, thus, less than significant impacts. Overall, Alternative 1 would result in greater impacts related to GHG emissions and energy compared to the proposed plan.

Land Use Planning, Population, and Housing

Under Alternative 1, no new utility scale renewable energy, electrical distribution, renewable fuel production, transportation, or any other infrastructure projects would be facilitated. Therefore, Alternative 1 would result in no impacts related to the division of an established community, displacement of people or housing, and substantial unplanned population growth. However, the Humboldt County General Plan and city general plans contain goals and policies related to the adoption of a climate action plan and minimization of the impacts of climate change. As such, Alternative 1 would result in significant and unavoidable operational impacts related to conflicts with plans and policies adopted for the purpose of avoiding environmental impacts.

As discussed in Section 3.6, *Land Use Planning, Population, and Housing*, the RCAP would result in no impacts related to the division of an established community and the displacement of people and housing. Additionally, though implementing the RCAP would require developing and implementing new programs and ordinances and/or modifying existing ones, the RCAP would not conflict with the regional, County, and city policies adopted for the purpose of avoiding environmental impacts. Impacts related to conflicts with land use policies would be less than significant. The RCAP would not facilitate additional housing but would result in new jobs throughout Humboldt related to renewable fuel production and the green jobs industry. New jobs facilitated by the RCAP would not be anticipated to result in substantial unplanned population growth, and there would be no impact.

Overall, Alternative 1 would result in similar impacts related to displacement of people and housing, the division of an established community, and population growth and greater impacts related to conflicts with land use policies compared to the proposed plan.

Noise

Under Alternative 1, no new utility scale renewable energy, electrical distribution, renewable fuel production, transportation, or any other infrastructure projects would be facilitated. Therefore, Alternative 1 would result in no impacts related to noise and vibration.

As discussed in Section 3.7, *Noise*, construction and operational activities associated with infrastructure improvements promoted by the RCAP would result in significant and unavoidable noise impacts. The RCAP would result in less than significant construction vibration impacts with mitigation, and less than significant operational vibration impacts. RCAP impacts related to airport noise would also be less than significant. In comparison to the proposed plan, Alternative 1 would result in lesser construction and operational impacts related to noise and vibration.

Transportation

Under Alternative 1, no projects would be facilitated that could conflict with a program, plan, ordinance, or policy addressing the circulation system and impacts would be less than significant. In addition, no development would be facilitated under Alternative 1, and no impacts related to VMT and conflicts with CEQA Guidelines Section 15064.3 would occur. As Alternative 1 would not result in any new infrastructure or development, there also would be no impacts related to roadway hazards and emergency access.

As discussed in Section 3.8, *Transportation*, the RCAP would promote active transportation and public transit improvements and a reduction in VMT. As such, the RCAP would be consistent with plans goals, and policies addressing the circulation system and CEQA Guidelines Section 15064.3, and there would be no impact related to these issues. No new active transportation, public transit, or mobility hubs would be created under Alternative 1, and this Alternative would not advance adopted local and regional goals and policies related to the circulation system and VMT. Therefore, Alternative 1 would result in greater operational impacts related to conflicts with circulation system goals, plans, and policies and VMT compared to the proposed plan. The RCAP would not substantially increase roadway hazards or result in inadequate emergency access, and impacts related to these issues would be less than significant. Alternative 1 would result in no alterations to existing roadway conditions or emergency access and would therefore, result in lesser impacts compared to the proposed plan. Overall, Alternative 1 would result in greater operational impacts related to VMT compared to the proposed plan.

Utilities and Service Systems

Under Alternative 1, no new utility scale renewable energy, electrical distribution, renewable fuel production, organic waste processing, recycled water, transportation, or any other infrastructure projects would be facilitated. No facilitated development would occur under Alternative 1, and, therefore, there would be no impacts related to the relocation or construction of new or expanded utilities infrastructure, water supplies, wastewater treatment capacity, and solid waste generation.

As described in Section 3.9, *Utilities and Service Systems*, the RCAP would result in significant and unavoidable impacts related to the expansion of electric power (construction and operational impacts), recycled water (construction impacts), and wastewater treatment facilities (construction impacts). The RCAP includes measures to reduce water use (and resulting wastewater treatment demand) and solid waste generation. As such, construction and operational impacts related to water supply, wastewater treatment capacity, and solid waste generation would be less than

significant. Alternative 1 would result in lesser impacts related to utilities and service systems in comparison to the proposed plan.

5.4.2 Conclusion

In summary, Alternative 1 would avoid the significant and unavoidable impacts related to aesthetics, construction air quality, biological resources, historic resources, agricultural resources, noise, and utilities and service systems related to the construction of renewable energy, electric power distribution, renewable fuel production, organic waste processing, and recycled water facilities. However, this alternative would result in significant and unavoidable impacts related to GHG emissions, energy, and land use, and there would also be increased impacts related to operational air quality, and transportation. In addition, the alternative would not meet any of the plan objectives described under Section 5.3, *Plan Objectives*.

5.5 Alternative 2: Sustainable Communities Alternative

5.5.1 Description

Strategy 7 of the RCAP includes Measure T-3, which commits the Regional Climate Committee (RCC) and jurisdictions to work with partners to enable and encourage mixed-use development in infill priority areas. Additionally, Strategy 6 in the RCAP includes Measure T-4, which focuses on developing regional mobility hubs and expanding transportation options across the region to decrease the level of travel via single occupancy vehicles. While the potential GHG emission reductions associated with these measures are not quantified in the RCAP, they are the foundational step for improving connectivity in the region.

Increasing connectivity between residents and essential needs (i.e., work, shopping, and social) and increasing access to alternative transportation options that are convenient, safe, and reliable can have a notable effect with respect to reducing GHG emissions. The Sustainable Communities Alternative would revise transportation measures within the RCAP to incorporate smart growth planning concepts into a regional growth pattern focused around “Mobility Hubs.” Mobility Hubs are envisioned as places of activity where capital transportation investment would support future housing and jobs and encompass areas that are located within both incorporated cities boundaries and unincorporated County. Under this alternative, RCAP Measure T-3 would be revised to accelerate smart growth development by requiring local jurisdictions to adopt modified or new land use and zoning designations to limit urban sprawl and promote high-density development. This will further support mixed-use development and reduce reliance on single-occupancy vehicles. Furthermore, under this alternative, RCAP Measure T-4 would be revised to commit the local jurisdictions to initiate the planning and development of Mobility Hub projects by 2027. This includes securing funding for transit accessibility improvements, network efficiency enhancements, and alternative transportation options. Additionally, the revised RCAP Measure T-4 would commit RCC to implementing a tracking mechanism to monitor the effectiveness of land use changes in achieving mode shift and reducing VMT.

The RCC would work with the cities, County, Humboldt County Association of Governments, and Humboldt Transit Authority to 1) identify appropriate locations for Mobility Hubs, 2) fund improvements to transit accessibility, 3) make network investments to improve efficiency of all transportation types, 4) implement alternative transportation options that provide last-mile connections to transit centers, and 5) make improvements to technology and communication

systems. The Sustainable Communities Alternative would then result in modifications to each jurisdiction's land use patterns. Qualifying development would be allowed through ministerial approvals. This alternative shifts the focus of the RCAP to integrating land use and transportation planning to achieve reduced regional VMT and GHG emission reductions. The remainder of the RCAP sector strategies would also be implemented as laid out in the RCAP document, and this Alternative 2 would meet the Statewide 2030 and 2045 GHG emissions reduction goals.

5.5.2 Impact Analysis

Aesthetics

Implementation of Alternative 2 would involve the same measures and actions as the RCAP, but with modifications to RCAP Measures T-3 and T-4 to accelerate smart growth development and VMT reductions. Under Alternative 2, RCAP measures related to renewable energy, electrical distribution, renewable fuel production, organic waste processing, and recycled water infrastructure would remain unchanged and would continue to result in significant and unavoidable impacts to scenic vistas, scenic resources within state scenic highways, and visual character or quality of public views. Alternative 2 would also result in less than significant impacts related to light and glare with implementation of mitigation measures. The same mitigation measures presented in Section 3.1, *Aesthetics*, would be required under Alternative 2.

As discussed in Section 3.1, *Aesthetics*, the proposed plan would result in significant and unavoidable impacts related to scenic vistas, scenic resources within State scenic highways, and visual character or quality of public views. The RCAP would result in less than significant impacts related to light and glare with implementation of mitigation measures. Alternative 2 would result in similar impacts related to aesthetics compared to the proposed plan.

Air Quality

Implementation of Alternative 2 would involve the same measures and actions as the RCAP, but with modifications to Measures T-3 and T-4 to accelerate smart growth development and VMT reductions. Alternative 2 would advance the applicable air quality plans through implementation of measures that would have co-benefits to air quality and would result in less than significant impacts related to conflicts with the applicable air quality plans. Construction of future projects facilitated by Alternative 2 would result in significant and unavoidable construction impacts related to criteria air pollutant emissions and less than significant construction impacts related to TAC emissions and sensitive receptors with implementation of mitigation. Alternative 2 would result in reduced VMT. As a result, long-term, operational regional criteria pollutant and TAC emissions would be reduced, and Alternative 2 would have beneficial operational impacts related to criteria air pollutant and TAC emissions. Alternative 2 would result in less than significant construction and operational impacts related to odors. The same mitigation measures presented in Section 3.2, *Air Quality*, would be required under Alternative 2.

As discussed in Section 3.2, *Air Quality*, the proposed plan would result in less than significant impacts related to conflicts with an air quality plan and odors. The proposed plan would result in significant and unavoidable construction impacts related to construction criteria air pollutant emissions. The proposed plan would result in less than significant construction TAC emissions with implementation of mitigation. Operational criteria air pollutant and TAC emissions under the proposed plan would be less than significant.

Overall, construction-related air quality impacts and impacts related to odors under Alternative 2 would be similar to the proposed plan. However, Alternative 2 would result in greater VMT reductions and associated operational criteria air pollutant and TAC emissions reductions. As a result, Alternative 2 would result in overall lesser air quality impacts compared to the proposed plan.

Biological, Agriculture, and Forestry Resources

Implementation of Alternative 2 would involve the same measures and actions as the RCAP, but with modifications to Measures T-3 and T-4 to accelerate smart growth development and VMT reductions. Under Alternative 2, RCAP measures related to renewable energy, electrical distribution, renewable fuel production, organic waste processing, and recycled water infrastructure would remain unchanged and would continue to result in significant and unavoidable impacts to special status species, wildlife corridors and nursery sites, and Farmland. Alternative 2 would also result in less than significant impacts related to conflicts with local biological resources policies (such as tree ordinances) and adopted habitat conservation plans. Additionally, Alternative 2 would result in less than significant impacts to forest land. The same mitigation measures presented in Section 3.3, *Biological, Agriculture, and Forestry Resources*, would be required under Alternative 2.

As discussed in Section 3.3, *Biological, Agriculture, and Forestry Resources*, the proposed plan would result in significant and unavoidable impacts related to biological and agricultural resources and less than significant impacts related to forestry resources. Construction- and operation-related biological and agricultural resources impacts under Alternative 2 would be similar to the proposed plan. Alternative 2 would result in similar impacts related to biological, agriculture, and forestry resources compared to the proposed plan.

Cultural and Tribal Cultural Resources

Implementation of Alternative 2 would involve the same measures and actions as the RCAP, but with modifications to Measures T-3 and T-4 to accelerate smart growth development and VMT reductions. Under Alternative 2, RCAP measures related to renewable energy, electrical distribution, renewable fuel production, organic waste processing, and recycled water infrastructure would remain unchanged and would continue to result in significant and unavoidable impacts to historic resources. Impacts to archaeological resources and tribal cultural resources under Alternative 2 would also be less than significant with mitigation. Impacts to human remains under Alternative 2 would be less than significant. The same mitigation measures presented in Section 3.4, *Cultural and Tribal Cultural Resources*, would be required under Alternative 2.

As discussed in Section 3.4, *Cultural and Tribal Cultural Resources*, the RCAP would result in significant and unavoidable construction impacts related to historic resources. RCAP impacts related to archaeological resources and tribal cultural resources would be less than significant with mitigation. RCAP impacts with regard to human remains would be less than significant. Alternative 2 would result in similar impacts related to cultural and tribal cultural resources compared to the proposed plan.

Greenhouse Gas Emissions and Energy

Implementation of Alternative 2 would involve the same measures and actions as the RCAP, but with modifications to Measures T-3 and T-4 to accelerate smart growth development and VMT reductions. Alternative 2 would result in reduced long-term GHG emissions and energy use from

non-renewable sources. Impacts related to GHG emissions and energy under Alternative 2 would be less than significant.

As discussed in Section 3.5, *Greenhouse Gas Emissions and Energy*, the RCAP would result in reduced operational GHG emissions and energy use from non-renewable sources and, thus, less than significant impacts. Alternative 2 would result in greater VMT reductions and associated GHG emissions and transportation fuel use reductions in comparison to the proposed plan. As a result, Alternative 2 would result in overall lesser GHG emissions and energy impacts compared to the RCAP.

Land Use Planning, Population, and Housing

Implementation of Alternative 2 would involve the same measures and actions as the RCAP, but with modifications to Measures T-3 and T-4 to accelerate smart growth development and VMT reductions. Under Alternative 2, there would be no impacts related to the division of an established community and the displacement of people and housing. Additionally, though implementing Alternative 2 would require some modification of existing policies, including developing and implementing new smart growth ordinances and requiring zoning code and general plan land use updates, Alternative 2 would not conflict with the regional, County, and City policies adopted for the purpose of avoiding environmental impacts. Impacts related to conflicts with land use policies would be less than significant. Alternative 2 would not facilitate additional housing but would result in new jobs throughout Humboldt related to renewable fuel production and the green jobs industry. New jobs facilitated by Alternative 2 would not be anticipated to result in substantial unplanned population growth, and impacts would be less than significant.

As discussed in Section 3.6, *Land Use Planning, Population, and Housing*, the RCAP would result in no impacts related to the division of an established community, the displacement of people and housing, and substantial unplanned population growth. The RCAP would result in less than significant impacts related to conflicts with land use policies. Alternative 2 would result in similar impacts related to land use planning and population and housing compared to the proposed plan.

Noise

Implementation of Alternative 2 would involve the same measures and actions as the RCAP, but with modifications to Measures T-3 and T-4 to accelerate smart growth development and VMT reductions. Under Alternative 2, RCAP measures related to renewable energy, electrical distribution, renewable fuel production, organic waste processing, and recycled water infrastructure would remain unchanged and would continue to result in significant and unavoidable construction and operational noise impacts. Alternative 2 would result in less than significant construction vibration impacts with mitigation, and less than significant operational vibration impacts. Impacts under Alternative 2 related to airport noise would also be less than significant. The same mitigation measures presented in Section 3.7, *Noise*, would be required under Alternative 2.

As discussed in Section 3.7, *Noise*, construction and operational activities associated with infrastructure improvements promoted by the RCAP would result in significant and unavoidable noise impacts. The RCAP would result in less than significant construction vibration impacts with mitigation, and less than significant operational vibration impacts. RCAP impacts related to airport noise would also be less than significant. Alternative 2 would result in similar impacts related to noise and vibration compared to the proposed plan.

Transportation

Implementation of Alternative 2 would involve the same measures and actions as the RCAP, but with modifications to Measures T-3 and T-4 to accelerate smart growth development and VMT reductions. Though implementing Alternative 2 would require some modification of existing policies, including developing and implementing new smart growth ordinances, Alternative 2 would promote active transportation and public transit improvements and a reduction in VMT. As such, Alternative 2 would be consistent with programs, plans, goals, and policies addressing the circulation system and CEQA Guidelines Section 15064.3, and there would be no impact related to these issues. Alternative 2 would not substantially increase roadway hazards or result in inadequate emergency access, and impacts related to these issues would be less than significant.

As discussed in Section 3.8, *Transportation*, the RCAP would promote active transportation and public transit improvements and a reduction in VMT. As such, the RCAP would be consistent with programs, plans, goals, and policies addressing the circulation system and CEQA Guidelines Section 15064.3, and there would be no impact related to these issues. The RCAP would not substantially increase roadway hazards or result in inadequate emergency access, and impacts related to these issues would be less than significant. Impacts related to roadway hazards and emergency access under Alternative 2 would be similar to the proposed plan. However, Alternative 2 would result in greater VMT reductions and improvements to the circulation system. As a result, Alternative 2 would result in lesser impacts related to consistency with circulation system plans and policies and VMT compared to the proposed plan.

Utilities and Service Systems

Implementation of Alternative 2 would involve the same measures and actions as the RCAP, but with modifications to Measures T-3 and T-4 to accelerate smart growth development and VMT reductions. Under Alternative 2, RCAP measures related to renewable energy, electrical distribution, renewable fuel production, organic waste processing, and recycled water infrastructure would remain unchanged and would continue to result in significant and unavoidable impacts related to the expansion of electric power, recycled water, and wastewater treatment facilities. Alternative 2 includes measures to reduce water use (and resulting wastewater treatment demand) and solid waste generation. As such, impacts related to water supply, wastewater treatment capacity, and solid waste generation would be less than significant.

As described in Section 3.9, *Utilities and Service Systems*, the RCAP would result in significant and unavoidable impacts related to the expansion of electric power (construction and operational impacts), recycled water (construction impacts), and wastewater treatment facilities (construction impacts). The RCAP includes measures to reduce water use (and resulting wastewater treatment demand) and solid waste generation. As such, construction and operational impacts related to water supply, wastewater treatment capacity, and solid waste generation would be less than significant. Alternative 2 would result in similar impacts related to utilities and service systems compared to the proposed plan.

5.5.3 Conclusion

In summary, Alternative 2 would involve implementation of the same measures and actions as the RCAP but with modifications to Measures T-3 and T-4 to accelerate smart growth development and VMT reductions. Therefore, Alternative 2 would generally result in the same level of impacts as the proposed plan, including significant and unavoidable impacts to aesthetics, construction air quality,

biological resources, historic resources, agricultural resources, noise, and utilities and service systems. However, this Alternative would result in lesser GHG emissions, operational criteria air pollutant and TAC emissions, and greater VMT reductions compared to the proposed plan, and impacts related to these issue areas would be lesser than under the RCAP. This alternative would also meet all of the plan objectives described under Section 5.3, *Plan Objectives*, above.

5.6 Alternative 3: Enhanced Carbon Sequestration Alternative

5.6.1 Description

Strategy 10 of the RCAP includes Measure CS-1, which focuses on conducting the initial feasibility analysis and funding identification for industrial carbon sequestration projects in the County, and Measure CS-3, which commits the County to conducting a natural and working lands GHG inventory. Implementation of these measures will not result in GHG emission reductions; however, they lay the necessary groundwork for pursuing industrial based carbon sequestration projects and for developing land use management practice policies to enhance and track natural working land carbon sequestration in the County.

The Enhanced Carbon Sequestration Alternative would revise Measures CS-1 and CS-3 to expedite the initial analysis necessary and require the County to develop and adopt policies to manage Humboldt's carbon stock such that carbon sequestration occurring in the region would be tracked and incorporated into the RCAP's GHG emissions inventory. Specifically, Measure CS-3 would be revised to:

- 1) Require the County to conduct a detailed carbon stock inventory of existing natural working lands to determine current levels of carbon sequestration and potential future sequestration under various climate scenarios by 2026.
- 2) Require the County to develop and adopt a series of policies, programs, and regulations aimed at maintaining and enhancing carbon sequestration in natural and working lands by 2027. These policies would focus on sustainable land management practices to maximize carbon sequestration potential.
- 3) Require the County to implement verifiable tracking mechanisms to monitor carbon stock change and ensure the effectiveness of the policies in maintaining or increasing carbon sequestration potential by 2027.

While achieving carbon sequestration through industrial processes by 2030 through Measure CS-1 may be challenging due to the need for extensive studies and project development, this alternative would revise Measure CS-1 to accelerate the timeline for initiating such projects. Specifically, under this alternative, Measure CS-1 would be revised to:

- 1) Require the County to complete feasibility studies to assess the capacity and suitability of potential sites for industrial carbon sequestration by 2027.
- 2) Require the County to initiate project planning and development processes based on the findings of the feasibility studies by 2030.

Under the Enhanced Carbon Sequestration Alternative, the above revised measures would result in the inclusion of carbon sequestration from natural working lands in the GHG inventory. This would

demonstrate the extent to which the County's carbon stock is offsetting GHG emissions generated within Humboldt, thereby contributing to the achievement of the County's overall climate action goals. The remainder of the RCAP would also be implemented as laid out in the RCAP document, and this Alternative 3 would meet the Statewide 2030 and 2045 GHG emissions reduction goal.

5.6.2 Impact Analysis

Aesthetics

Implementation of Alternative 3 would involve the same measures and actions as the RCAP, but with modifications to Measures CS-1 and CS-3 to expedite the initial analysis necessary and require the County to develop and adopt policies to manage Humboldt's carbon stock such that carbon sequestration would be tracked and incorporated into the County's inventory. Under Alternative 3, RCAP measures related to renewable energy, electrical distribution, renewable fuel production, organic waste processing, and recycled water infrastructure would remain unchanged and would continue to result in significant and unavoidable impacts to scenic vistas, scenic resources within state scenic highways, and visual character or quality of public views. Alternative 3 would also result in less than significant impacts related to light and glare with implementation of mitigation measures. The same mitigation measures presented in Section 3.1, *Aesthetics*, would be required under Alternative 3.

As discussed in Section 3.1, *Aesthetics*, the proposed plan would result in significant and unavoidable impacts related to scenic vistas, scenic resources within State scenic highways, and visual character or quality of public views. The RCAP would result in less than significant impacts related to light and glare with implementation of mitigation measures. Aesthetic impacts under Alternative 3 would be similar to the proposed plan.

Air Quality

Implementation of Alternative 3 would involve the same measures and actions as the RCAP, but with modifications to Measures CS-1 and CS-3 to expedite the initial analysis necessary and require the County to develop and adopt policies to manage Humboldt's carbon stock such that carbon sequestration would be tracked and incorporated into the County's inventory. Alternative 3 would advance the applicable air quality plans through implementation of measures that would have co-benefits to air quality and would result in less than significant impacts related to conflicts with the applicable air quality plans. Construction of future projects facilitated by Alternative 3 would result in significant and unavoidable construction impacts related to criteria air pollutant emissions and less than significant construction impacts related to TAC emissions and sensitive receptors with implementation of mitigation. Alternative 3 would result in reduced VMT. As a result, long-term, operational regional criteria pollutant and TAC emissions would be reduced and Alternative 3 would have beneficial operational impacts related to criteria air pollutant and TAC emissions. Alternative 3 would result in less than significant construction and operational impacts related to odors. The same mitigation measures presented in Section 3.2, *Air Quality*, would be required under Alternative 3.

As discussed in Section 3.2, *Air Quality*, the proposed plan would result in less than significant impacts related to conflicts with an air quality plan and odors. The proposed plan would result in significant and unavoidable construction impacts related to construction criteria air pollutant emissions. The proposed plan would result in less than significant construction TAC emissions with implementation of mitigation. Operational criteria air pollutant and TAC emissions under the

proposed plan would be less than significant. Therefore, air quality impacts under Alternative 3 would be similar to the proposed plan.

Biological, Agriculture, and Forestry Resources

Implementation of Alternative 3 would involve the same measures and actions as the RCAP, but with modifications to Measures CS-1 and CS-3 to expedite the initial analysis necessary and require the County to develop and adopt policies to manage Humboldt's carbon stock such that carbon sequestration would be tracked and incorporated into the County's inventory. This may include additional application of compost on agricultural, parks, and open space areas and expanded wetland conservation and restoration, among other potential strategies. Under Alternative 3, RCAP measures related to renewable energy, electrical distribution, renewable fuel production, organic waste processing, and recycled water infrastructure would remain unchanged and would continue to result in significant and unavoidable impacts to special status species, wildlife corridors and nursery sites, and Farmland. Alternative 3 would also result in less than significant impacts related to conflicts with local biological resources policies (such as tree ordinances) and adopted habitat conservation plans. Additionally, Alternative 3 would result in less than significant impacts to forest land. The same mitigation measures presented in Section 3.3, *Biological, Agriculture, and Forestry Resources*, would be required under Alternative 3.

As discussed in Section 3.3, *Biological, Agriculture, and Forestry Resources*, the proposed plan would result in significant and unavoidable impacts related to biological and agricultural resources and less than significant impacts related to forestry resources. Alternative 3 would emphasize restoration, enhancement, and preservation of natural and working lands to a greater extent than the RCAP, and, therefore, would result in lesser impacts related to biological, agriculture, and forestry resources compared to the proposed plan.

Cultural and Tribal Cultural Resources

Implementation of Alternative 3 would involve the same measures and actions as the RCAP, but with modifications to Measures CS-1 and CS-3 to expedite the initial analysis necessary and require the County to develop and adopt policies to manage Humboldt's carbon stock such that carbon sequestration would be tracked and incorporated into the County's inventory. Under Alternative 3, RCAP measures related to renewable energy, electrical distribution, renewable fuel production, organic waste processing, and recycled water infrastructure would remain unchanged and would continue to result in significant and unavoidable impacts to historic resources. Impacts to archaeological resources and tribal cultural resources under Alternative 3 would also be less than significant with mitigation. Impacts to human remains under Alternative 3 would be less than significant. The same mitigation measures presented in Section 3.4, *Cultural and Tribal Cultural Resources*, would be required under Alternative 3.

As discussed in Section 3.4, *Cultural and Tribal Cultural Resources*, the RCAP would result in significant and unavoidable construction impacts related to historic resources. RCAP impacts related to archaeological resources and tribal cultural resources would be less than significant with mitigation. RCAP impacts with regard to human remains would be less than significant. Alternative 3 would result in similar impacts related to cultural and tribal cultural resources compared to the proposed plan.

Greenhouse Gas Emissions and Energy

Implementation of Alternative 3 would involve the same measures and actions as the RCAP, but with modifications to Measures CS-1 and CS-3 to expedite the initial analysis necessary and require the County to develop and adopt policies to manage Humboldt's carbon stock such that carbon sequestration would be tracked and incorporated into the County's inventory. Alternative 3 would result in reduced long-term GHG emissions and energy use from non-renewable sources. Impacts related to GHG emissions and energy under Alternative 3 would be less than significant.

As discussed in Section 3.5, *Greenhouse Gas Emissions and Energy*, the RCAP would result in reduced operational GHG emissions and energy use from non-renewable sources and, thus, less than significant impacts. While Alternative 3 would not result in increased GHG emissions reductions in comparison to the RCAP, it would lay the necessary groundwork for pursuing industrial based carbon sequestration projects and for developing land use management practice polices to enhance and track natural working land carbon sequestration in Humboldt. Alternative 3 would result in the inclusion of carbon sequestration from natural working lands in the GHG inventory. This would demonstrate the extent to which the County's carbon stock is offsetting GHG emissions generated within Humboldt, thereby contributing to the achievement of the County's overall climate action goals. As a result, Alternative 3 would result in overall lesser GHG emissions impacts compared to the proposed plan. Energy impacts would be similar to the proposed plan.

Land Use Planning, Population, and Housing

Implementation of Alternative 3 would involve the same measures and actions as the RCAP, but with modifications to Measures CS-1 and CS-3 to expedite the initial analysis necessary and require the County to develop and adopt policies to manage Humboldt's carbon stock such that carbon sequestration would be tracked and incorporated into the County's inventory. Under Alternative 3, there would be no impacts related to the division of an established community and the displacement of people and housing. Additionally, though implementing Alternative 3 would require some modification of existing policies, including developing and implementing new programs and ordinances or modifying existing ones, Alternative 3 would not conflict with the regional, County, and City policies adopted for the purpose of avoiding environmental impacts. Impacts related to conflicts with land use policies would be less than significant. Alternative 3 would not facilitate additional housing but would result in new jobs throughout Humboldt related to renewable fuel production and the green jobs industry. New jobs facilitated by Alternative 3 would not be anticipated to result in substantial unplanned population growth, and impacts would be less than significant.

As discussed in Section 3.6, *Land Use Planning, Population, and Housing*, the RCAP would result in no impacts related to the division of an established community, the displacement of people and housing, and substantial unplanned population growth. The RCAP would result in less than significant impacts related to conflicts with land use policies. Alternative 3 would result in similar impacts related to land use and population and housing compared to the proposed plan.

Noise

Implementation of Alternative 3 would involve the same measures and actions as the RCAP, but with modifications to Measures CS-1 and CS-3 to expedite the initial analysis necessary and require the County to develop and adopt policies to manage Humboldt's carbon stock such that carbon sequestration would be tracked and incorporated into the County's inventory. Under Alternative 3,

RCAP measures related to renewable energy, electrical distribution, renewable fuel production, organic waste processing, and recycled water infrastructure would remain unchanged and would continue to result in significant and unavoidable construction and operational noise impacts. Alternative 3 would result in less than significant construction vibration impacts with mitigation, and less than significant operational vibration impacts. Impacts under Alternative 3 related to airport noise would also be less than significant. The same mitigation measures presented in Section 3.7, *Noise*, would be required under Alternative 3.

As discussed in Section 3.7, *Noise*, construction and operational activities associated with infrastructure improvements promoted by the RCAP would result in significant and unavoidable noise impacts. The RCAP would result in less than significant construction vibration impacts with mitigation, and less than significant operational vibration impacts. RCAP impacts related to airport noise would also be less than significant. Alternative 3 would result in similar impacts related to noise and vibration compared to the proposed plan.

Transportation

Implementation of Alternative 3 would involve the same measures and actions as the RCAP, but with modifications to Measures CS-1 and CS-3 to expedite the initial analysis necessary and require the County to develop and adopt policies to manage Humboldt's carbon stock such that carbon sequestration would be tracked and incorporated into the County's inventory. Alternative 3 would require some modification of existing policies to promote active transportation and public transit improvements and a reduction in VMT. These changes would be consistent with programs, plans, goals, and policies addressing the circulation system and CEQA Guidelines Section 15064.3, and there would be no impact related to these issues. Alternative 3 would not substantially increase roadway hazards or result in inadequate emergency access, and impacts related to these issues would be less than significant.

As discussed in Section 3.8, *Transportation*, the RCAP would promote active transportation and public transit improvements and a reduction in VMT. As such, the RCAP would be consistent with programs, plans, and policies addressing the circulation system and CEQA Guidelines Section 15064.3, and there would be no impact related to these issues. The RCAP would not substantially increase roadway hazards or result in inadequate emergency access, and impacts related to these issues would be less than significant. Alternative 3 would implement the same transportation-related measures as the RCAP. As such, impacts related to consistency with circulation system plans and policies, VMT, roadway hazards, and emergency access would be similar to the proposed plan.

Utilities and Service Systems

Implementation of Alternative 3 would involve the same measures and actions as the RCAP, but with modifications to Measures CS-1 and CS-3 to expedite the initial analysis necessary and require the County to develop and adopt policies to manage Humboldt's carbon stock such that carbon sequestration would be tracked and incorporated into the County's inventory. Under Alternative 3, RCAP measures related to renewable energy, electrical distribution, renewable fuel production, organic waste processing, and recycled water infrastructure would remain unchanged and would continue to result in significant and unavoidable impacts related to the expansion of electric power, recycled water, and wastewater treatment facilities. Alternative 3 includes measures to reduce water use (and resulting wastewater treatment demand) and solid waste generation. As such, impacts related to water supply, wastewater treatment capacity, and solid waste generation would be less than significant.

As described in Section 3.9, *Utilities and Service Systems*, the RCAP would result in significant and unavoidable impacts related to the expansion of electric power (construction and operational impacts), recycled water (construction impacts), and wastewater treatment facilities (construction impacts). The RCAP includes measures to reduce water use (and resulting wastewater treatment demand) and solid waste generation. As such, construction and operational impacts related to water supply, wastewater treatment capacity, and solid waste generation would be less than significant. Alternative 3 would result in similar impacts related to utilities and service systems compared to the proposed plan.

5.6.3 Conclusion

In summary, Alternative 3 would involve implementation of the same measures and actions as the RCAP but with modifications to Measures CS-1 and CS-3 to manage Humboldt's carbon stock such that carbon sequestration would be tracked and incorporated into the County's inventory. Therefore, Alternative 3 would generally result in the same level of impacts as the proposed plan, including significant and unavoidable impacts to aesthetics, construction air quality, biological resources, historic resources, agricultural resources, noise, and utilities and service systems. While Alternative 3 would not result in increased GHG emissions reductions in comparison to the RCAP, it would lay the necessary groundwork for pursuing industrial based carbon sequestration projects and for developing land use management practice policies to enhance and track natural working land carbon sequestration in Humboldt. Alternative 3 would result in the inclusion of carbon sequestration from natural working lands in the GHG inventory. This would demonstrate the extent to which the County's carbon stock is offsetting GHG emissions generated within Humboldt, thereby contributing to the achievement of the County's overall climate action goals. Alternative 3 would also emphasize the preservation, enhancement, and restoration of natural and working lands to a greater extent than the RCAP. As a result, Alternative 3 would result in overall lesser GHG emissions and biological, agricultural, and forestry resources impacts compared to the proposed plan. This alternative would also meet all of the plan objectives described under Section 5.3, *Plan Objectives*, above.

5.7 Alternatives Considered but Rejected

The following summarizes alternatives considered, but ultimately rejected for inclusion in the analysis, because they would not meet most of the proposed plan objectives, would not substantially reduce environmental impacts compared to the proposed plan, or were determined to be infeasible.

1. The County considered a potential "Preparation of Individual Climate Action Plans (CAPs)" alternative that would involve the County and seven incorporated cities each adopting separate CAPs. However, the preparation of individual CAPs was found to be infeasible for some of the smaller cities in Humboldt due to cost limitations. In addition, the preparation of separate CAPs would reduce the ability of Humboldt to accomplish its GHG emissions reductions on a regional scale, would not take advantage of existing joint power authorities serving the region, and would not meet the basic objective to establish a coalition between jurisdictions and key organizations to guide a regional approach to climate-related challenges. Therefore, this alternative is rejected, because it would not meet most of the basic project objectives and is not feasible.

2. The County considered a potential “No Growth Policy” alternative that would involve the County reducing GHG emissions by enacting a moratorium on new development, thereby avoiding additional carbon emissions that would occur from new development. A No Growth alternative would not meet most of the basic objectives, including meeting Statewide GHG emissions reductions goals or providing the County with a qualified GHG emissions reduction plan to streamline the CEQA GHG emissions analyses of future development projects. The County cannot reasonably, feasibly, or legally restrict growth across all sectors of development, including residential, commercial, and industrial. A No Growth Policy alternative would result in negative economic effects as new employment opportunities from new development would halt, opportunities for new residents to live in the County would be limited, and contributions to the local economy would cease. A No Growth Policy would also conflict with State law requiring that the region meet its Regional Housing Needs Allocation developed by the California Department of Housing and Community Development. Therefore, this alternative is rejected, because it would not meet most of the basic project objectives and is not feasible.
3. The County considered a potential “Carbon Credit” alternative under which, in lieu of adopting the RCAP and CEQA GHG Emissions Thresholds, the County would purchase carbon offsets to reduce GHG emissions. Carbon offset projects could increase or protect carbon sequestration, invest in solar or wind projects, improve water or energy efficiency, capture methane at animal farms or landfills, replace high-global warming-potential gas use with a gas that has a lower global warming potential, or implement other types of measures. To achieve the greatest environmental benefits to Humboldt, priority would be given, from highest to lowest, to offsets purchased locally (within the County), regionally (within the North Coast of California), within California, outside of California but within the Pacific Northwest (and elsewhere in the United States). However, this alternative would not meet most of the basic objectives, including meeting Statewide GHG emissions reductions goals or providing the County with a qualified GHG emissions reduction plan to streamline CEQA GHG emissions analyses of future development projects. Therefore, this alternative was rejected.

5.8 Environmentally Superior Alternative

CEQA Guidelines Section 15126(e)(2) requires identification of an environmentally superior alternative. If the “No Project” Alternative is environmentally superior, CEQA requires selection of the “environmentally superior alternative other than the No Project Alternative” from among the proposed plan and the alternatives evaluated.

5.8.1 Alternative Impacts and Objectives Comparison

To identify the environmentally superior alternative in accordance with the CEQA Guidelines, Table 5-1 presents a comparison of the impacts related to the alternatives and indicates whether each alternative’s environmental impact is greater than, lesser than, or similar to that of the proposed plan for each of the topic areas that were analyzed.

Table 5-1 Summary of Alternatives' Impacts

Impact Area	Proposed Project	Alternative 1: No Project	Alternative 2: Sustainable Communities	Alternative 3: Carbon Sequestration
Aesthetics				
Scenic Vistas	Significant and Unavoidable	Lesser (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
Scenic Highways	Significant and Unavoidable	Lesser (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
Visual Character and Quality	Significant and Unavoidable	Lesser (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
Light and Glare	LTS with Mitigation	Lesser (No Impact)	Similar (LTS with Mitigation)	Similar (LTS with Mitigation)
Air Quality				
Conflict with Air Quality Plan	LTS	Greater (LTS)	Lesser (LTS)	Similar (LTS)
Criteria Pollutant Emissions				
Construction	Significant and Unavoidable	Lesser (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
Operation	LTS	Greater (LTS)	Lesser (LTS)	Similar (LTS)
Toxic Air Contaminants				
Construction	LTS with Mitigation	Lesser (No Impact)	Similar (LTS with Mitigation)	Similar (LTS with Mitigation)
Operation	LTS	Greater (LTS)	Lesser (LTS)	Similar (LTS)
Odors				
Construction	LTS	Lesser (No Impact)	Similar (LTS)	Similar (LTS)
Operation	LTS	Lesser (No Impact)	Similar (LTS)	Similar (LTS)
Biological, Agriculture, and Forestry Resources				
Special Status Species				
Construction	Significant and Unavoidable	Lesser (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
Operation	Significant and Unavoidable	Lesser (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
Sensitive Natural Communities and Wetlands				
Construction	LTS with Mitigation	Lesser (No Impact)	Similar (LTS with Mitigation)	Similar (LTS with Mitigation)
Operation	No Impact	Similar (No Impact)	Similar (No Impact)	Lesser (No Impact)

Humboldt County
Regional Climate Action Plan and CEQA GHG Emissions Thresholds

Impact Area	Proposed Project	Alternative 1: No Project	Alternative 2: Sustainable Communities	Alternative 3: Carbon Sequestration
Wildlife Movement and Nursery Sites				
Construction	Significant and Unavoidable	Lesser (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
Operation	No impact	Similar (No Impact)	Similar (No Impact)	Lesser (No Impact)
Conflicts with Local Biological Resources Policies				
Construction	LTS	Lesser (No Impact)	Similar (LTS)	Similar (LTS)
Operation	No Impact	Similar (No Impact)	Similar (No Impact)	Lesser (No Impact)
Conflicts with Adopted Habitat Conservation Plans	LTS	Lesser (No Impacts)	Similar (LTS)	Similar (LTS)
Conversion of Farmland to Non-Agricultural Use	Significant and Unavoidable	Lesser (No Impact)	Similar (Significant and Unavoidable)	Lesser (Significant and Unavoidable)
Conversion of Forest Land to Non-Forest Use	LTS	Lesser (No Impact)	Similar (LTS)	Lesser (LTS)
Cultural and Tribal Cultural Resources				
Historical Resources				
Construction	Significant and Unavoidable	Lesser (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
Operation	No impact	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)
Archaeological Resources				
Construction	LTS with Mitigation	Lesser (No Impact)	Similar (LTS with Mitigation)	Similar (LTS with Mitigation)
Operation	No impact	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)
Human Remains				
Construction	LTS	Lesser (No Impact)	Similar (LTS)	Similar (LTS)
Operation	No impact	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)
Tribal Cultural Resources				
Construction	LTS with Mitigation	Lesser (No Impact)	Similar (LTS with Mitigation)	Similar (LTS with Mitigation)
Operation	No impact	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)

Impact Area	Proposed Project	Alternative 1: No Project	Alternative 2: Sustainable Communities	Alternative 3: Carbon Sequestration
Greenhouse Gas Emissions and Energy				
Greenhouse Gas Emissions				
Construction	LTS	Lesser (No Impact)	Similar (LTS)	Similar (LTS)
Operation	LTS	Greater (Significant and Unavoidable)	Lesser (LTS)	Lesser (LTS)
Energy				
Construction	LTS	Lesser (No Impact)	Similar (LTS)	Similar (LTS)
Operation	LTS	Greater (Significant and Unavoidable)	Lesser (LTS)	Similar (LTS)
Land Use, Planning, Population, and Housing				
Division of an Established Community	No Impact	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)
Conflict with Land Use Plans and Policies	LTS	Greater (Significant and Unavoidable)	Similar (LTS)	Similar (LTS)
Substantial Unplanned Population Growth	LTS	Lesser (No Impact)	Similar (LTS)	Similar (LTS)
Displacement of People and Housing	No Impact	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)
Noise and Vibration				
Noise				
Construction	Significant and Unavoidable	Lesser (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
Operation	Significant and Unavoidable	Lesser (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
Vibration				
Construction	LTS with Mitigation	Lesser (No Impact)	Similar (LTS with Mitigation)	Similar (LTS with Mitigation)
Operation	LTS	Lesser (No Impact)	Similar (LTS)	Similar (LTS)
Transportation				
Conflict with Plans, Policies, and Programs				
Construction	LTS	Lesser (No Impact)	Similar (LTS)	Similar (LTS)
Operation	No Impact	Greater (No Impact)	Lesser (No Impact)	Similar (No Impact)

Humboldt County
Regional Climate Action Plan and CEQA GHG Emissions Thresholds

Impact Area	Proposed Project	Alternative 1: No Project	Alternative 2: Sustainable Communities	Alternative 3: Carbon Sequestration
Vehicle Miles Traveled				
Construction	No Impact	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)
Operation	No Impact	Greater (No Impact)	Lesser (No Impact)	Similar (No Impact)
Design Hazards				
Construction	LTS	Lesser (No Impact)	Similar (LTS)	Similar (LTS)
Operation	LTS	Lesser (No Impact)	Similar (LTS)	Similar (LTS)
Emergency Access				
Construction	LTS	Lesser (No Impact)	Similar (LTS)	Similar (LTS)
Operation	LTS	Lesser (No Impact)	Similar (LTS)	Similar (LTS)
Utilities and Service Systems				
Water Infrastructure				
Construction	Significant and Unavoidable	Lesser (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
Operation	LTS	Lesser (No Impact)	Similar (LTS)	Similar (LTS)
Wastewater Infrastructure				
Construction	Significant and Unavoidable	Lesser (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
Operation	LTS	Lesser (No Impact)	Similar (LTS)	Similar (LTS)
Electric Power Infrastructure				
Construction	Significant and Unavoidable	Lesser (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
Operation	Significant and Unavoidable	Lesser (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
Natural Gas and Telecommunications Infrastructure				
Construction	LTS	Lesser (No Impact)	Similar (LTS)	Similar (LTS)
Operation	LTS	Lesser (No Impact)	Similar (LTS)	Similar (LTS)

Impact Area	Proposed Project	Alternative 1: No Project	Alternative 2: Sustainable Communities	Alternative 3: Carbon Sequestration
Water Supply	LTS	Lesser (No Impact)	Similar (LTS)	Similar (LTS)
Wastewater Treatment Capacity	LTS	Lesser (No Impact)	Similar (LTS)	Similar (LTS)
Solid Waste Generation	LTS	Lesser (No Impact)	Similar (LTS)	Similar (LTS)

LTS = Less than Significant

5.8.2 Identification of Environmentally Superior Alternative

Based on the alternatives analysis provided in this EIR chapter, Alternative 1 (No Project) is the environmentally superior alternative, as it would lessen the severity of most impacts of the proposed plan. However, it would not meet any of the proposed plan objectives. If the “No Project” Alternative is determined to avoid or reduce more impacts than any other alternative, CEQA requires that the EIR identify an environmentally superior alternative among the other alternatives (CEQA Guidelines Section 15126.6[e]).

Alternative 2 (Sustainable Communities) would further reduce VMT and associated GHG emissions, air pollutant emissions, and transportation energy use in Humboldt in comparison to the proposed plan. While most Alternative 2 impacts are similar in significance to the proposed plan, greater benefits related to air quality, energy use, GHG emissions, and transportation would occur. Alternative 2 would also meet all of the plan objectives. Alternative 3 (Enhanced Carbon Sequestration) would result in the same significant and unavoidable impacts as the proposed plan, but impacts to biological, agricultural, and forestry resources would be slightly reduced in comparison to the proposed plan. Additionally, though Alternative 3 would not result in greater GHG emissions reductions compared to the RCAP and Alternative 2, it would advance Humboldt’s climate action goals to a greater extent than the proposed plan.

Overall, of the alternatives evaluated in this EIR chapter, Alternative 3 (Carbon Sequestration) would be the environmentally superior alternative.