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**Tables**

None.

**Figures**

None.

## 4 Other CEQA Sections

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This chapter discusses growth-inducing impacts and irreversible environmental impacts that would be caused by the RCAP and CEQA GHG Emissions Thresholds.

### 4.1 Growth Inducing Impacts

There are two types of growth-inducing impacts that a plan or project may have: direct and indirect. To assess the potential for growth-inducing impacts, the proposed plan's characteristics that may encourage and facilitate activities that individually or cumulatively may affect the environment must be evaluated. CEQA Guidelines Section 15126.2(d) requires a discussion of a proposed plan or project's potential to foster economic or population growth, including ways in which a plan could remove an obstacle to growth. Growth does not necessarily create significant physical changes to the environment. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental effects. The CEQA Guidelines, as interpreted by the County, state that a significant growth-inducing impact may result if the proposed plan would:

- Induce substantial population growth in an area (for example, by proposing or facilitating new residences or employment-generating uses beyond the land use density/intensity envisioned in the general plan);
- Substantially alter the planned location, distribution, density, or growth rate of the population of an area; or
- Include extensions of roads or other infrastructure not assumed in the general plan or adopted capital improvements project list, when such infrastructure exceeds the needs of a project and could accommodate unplanned future development.

Direct growth-inducing impacts occur when the implementation of a plan or project imposes new burdens on a community by directly inducing population growth, or by leading to the construction of additional developments in the same area. Also included in this category are plans or projects that remove physical obstacles to population growth (such as a new road into an undeveloped area or a wastewater treatment plant with excess capacity that could allow additional development in the service area). Construction of these types of infrastructure cannot be considered isolated from the development they facilitate and serve. Plans or projects that physically remove obstacles to growth, or projects that indirectly induce growth, may provide a catalyst for future unrelated development in an area such as a new residential community that requires additional commercial uses to support residents.

#### 4.1.1 Population and Employment Growth

As discussed in Section 3.6, *Land Use Planning, Population and Housing*, the RCAP and CEQA GHG Emissions Thresholds would not result in construction or operational impacts related to significant unplanned population or employment growth. The RCAP and CEQA GHG Emissions Thresholds would not directly increase the population nor indirectly induce additional unplanned population growth.

It is the specific purpose of the proposed plan to reduce Humboldt's contribution to climate change impacts. Therefore, by its nature, the proposed plan is intended to reduce the potential for

uncontrolled growth and associated environmental impacts. For the reasons discussed above, implementation of the proposed plan would not lead to direct or indirect growth impacts beyond what is anticipated and planned for within the region.

#### 4.1.2 Removal of Obstacles to Growth

As discussed under Impact LU-1 and LU-2 in Section 3.6, *Land Use Planning, Population and Housing*, the RCAP and CEQA GHG Emissions Thresholds are policy documents intended to mitigate and track regional GHG emissions and streamline CEQA GHG analyses for future projects. As such, they would not result in construction or operational impacts that would remove obstacles to growth. It is the intention of the RCAP and CEQA GHG Emissions Thresholds to reduce GHG emissions associated with construction and operation of future projects and plans within Humboldt. Therefore, the proposed plan would not remove obstacles to unplanned growth.

### 4.2 Irreversible Environmental Effects

CEQA Guidelines Section 15126(c) requires that EIRs evaluating plans and projects involving amendments to public plans, ordinances, or policies contain a discussion of significant irreversible environmental changes. CEQA also requires decision-makers to balance the benefits of a proposed plan or project against its unavoidable environmental risks in determining whether to approve a plan or project. This section addresses the use of non-renewable resources, the commitment of future generations to any proposed development and land use changes, and irreversible impacts associated with the implementation of the RCAP and CEQA GHG Emissions Thresholds.

The RCAP and CEQA GHG Emissions Thresholds are policy documents that do not propose specific new developments that would result in construction or operational impacts related to the use of non-renewable resources. Rather, the documents would serve to reduce GHG emissions and energy required for the construction and operation of new development. Implementation of strategies and measures within the RCAP are expected to offset the demand for non-renewable energy during construction and/or operation of future development. The RCAP and CEQA GHG Emissions Thresholds would not result in additional growth within Humboldt and are not expected to diminish local or regional non-renewable energy supplies. Plan impacts related to energy consumption are further evaluated in Section 3.5, *Greenhouse Gas Emissions and Energy*, and Section 3.9, *Utilities and Service Systems*

Infrastructure facilitated by the RCAP would result in new electric power, recycled water, and wastewater infrastructure. As discussed in Section 3.9, *Utilities and Service Systems*, impacts to utilities would remain significant and unavoidable as they relate to construction of new electric power, wastewater, and water infrastructure facilities, as well as operation of new electric power infrastructure and facilities.

The RCAP would facilitate decreased regional vehicle miles traveled (VMT), and operational air pollution and GHG emissions. As discussed in Section 3.2, *Air Quality*, and Section 3.5, *Greenhouse Gas Emissions and Energy*, implementation of the RCAP measures would reduce the air pollution and GHG emissions associated with general operations across Humboldt; however, noise impacts would not be reduced to below significant thresholds. In addition, temporary air quality impacts during future RCAP project construction would not be reduced to below the applicable significance thresholds. As discussed in Section 3.4, *Cultural and Tribal Cultural Resources*, RCAP impacts to historical resources would also not be reduced to below significant thresholds. The RCAP would result in irreversible impacts related to these issues.

## 4.3 Mandatory Findings of Significance

Pursuant to CEQA Guidelines Appendix G Section XVIII, the following mandatory findings of significance analysis is provided.

- a. Does the proposed plan have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?**

The intent of the RCAP and CEQA GHG Emissions Thresholds is to reduce GHG emissions from Humboldt regional operations through implementation of strategies and measures related to energy, water consumption, transportation, solid waste, carbon sequestration, and community education and outreach. The RCAP strategies and measures are consistent with the Humboldt County General Plan and incorporated city general plans and encourage residents, businesses, and the municipal facilities to reduce energy and water use, fuel use, VMT, and solid waste generation, with a resulting decrease in GHG emissions. As discussed in more detail in Section 3.3, *Biological, Agriculture, and Forestry Resources*, the RCAP would result in indirect impacts to special-status species due to the loss of common, non-sensitive habitat. Implementation of Mitigation Measures BIO-1 through BIO-4 would reduce some impacts to loss of habitat. However, there remains the potential for implementation of the RCAP to eliminate or threaten wildlife habitats. Likewise, as discussed in Section 3.4, *Cultural and Tribal Cultural Resources*, the RCAP could result in substantial adverse changes to the significance of a historic resource. Implementation of Mitigation Measure CR-1 would reduce impacts to historic resources to the extent feasible. However, there remains the potential for implementation of the RCAP to eliminate or threaten historic resources.

- b. Does the proposed plan have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?**

As a guidance document, the CEQA GHG Emissions Thresholds would not result in cumulative impacts. Implementation of the RCAP would result in a cumulatively beneficial reduction of GHG and air pollutant emissions across the region. Nonetheless, as addressed throughout Section 3.1, *Aesthetics*, through Section 3.9, *Utilities and Service Systems*, the RCAP has the potential to result in significant and unavoidable cumulative impacts related to aesthetics, construction air pollutant emissions, biological resources, agricultural and forestry resources, historic resources, noise, and utilities and service systems.

- c. Does the proposed plan have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?**

In general, impacts to human beings are associated with air quality, GHG emissions and climate change, hazards and hazardous materials, noise, transportation, and wildfire. As detailed in the preceding sections, the RCAP and CEQA GHG Emissions Thresholds would not result, either directly or indirectly, in substantial adverse effects related to GHG emissions, hazards, transportation, or wildfire. As discussed throughout this document, the RCAP would serve as a pathway to reduce

operational GHG emissions and would result in other positive environmental and sustainability effects. These benefits include reduction in building energy and water consumption, VMT, and solid waste generation, as well as improved long-term air quality and resiliency to the effects of climate change and wildfire.

However, as discussed in more detail in Section 3.2, *Air Quality*, and Section 3.7, *Noise*, the RCAP would result in significant and unavoidable temporary construction impacts related to air quality and noise that could, in turn, affect human beings. As discussed in Section 3.7, *Noise*, operational noise associated with implementation of the RCAP could result in exceedances of County or specific cities noise thresholds that may result in a substantial adverse effect to human beings. Therefore, the RCAP would result in a significant and unavoidable impact related to potential for adverse effects on human beings.