

CHAPTER 1

INTRODUCTION

This Program Environmental Impact Report (PEIR) describes possible environmental effects that could result through the implementation of the proposed Fortuna General Plan 2030 (proposed General Plan or proposed plan), an update of the City's existing 1993 General Plan (existing General Plan).

The proposed General Plan includes goals, policies and implementation programs for development and growth within Fortuna's Planning Area through the year 2030. The Planning Area includes the existing incorporated City, four proposed Annexation Areas (Riverwalk, Strongs Creek, Carson Woods Road, and Rohnerville Airport), and the City's existing sphere of influence (less the annexation areas). The proposed General Plan includes - two documents:

- (1) The General Plan 2030 Policy Document, including a Land Use Diagram, goals, policies and implementation programs to guide development of the City over the next 20 years (available for review on the City's website); and
- (2) The General Plan 2030 Background Report, which describes existing conditions and trends in the City (appendix G of this PEIR).

The City of Fortuna, as the General Plan lead agency, is charged with the responsibility of, where possible, avoiding or minimizing environmental damage that could occur resulting from the General Plan's implementation. As part of this responsibility, the City is required to balance the General Plan's economic, environmental, and social objectives. This PEIR is integral to that process, functioning to both help formulate the proposed General Plan and inform the decision-makers and public as to the significant effects that might result from General Plan implementation.

In addition, the PEIR identifies possible means for minimizing potentially significant effects, and presents a range of alternatives to the proposed General Plan. The City of Fortuna must consider the information in this PEIR, along with any other available information, before making its decision about the proposed General Plan.

1.1 THE PURPOSE OF CONDUCTING ENVIRONMENTAL REVIEW

The purpose of the State of California Environmental Quality Act (CEQA) is summarized in the CEQA Guidelines Article One §15002, as follows:

The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities;
- Identify ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and

- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

PEIR as an Informational Document §15121

The Program Environmental Impact Report (PEIR) is an informational document to inform public agency decision-makers and the public about the significant environmental effects of a project, identify ways to minimize those effects, and describe an array of reasonable alternatives to the project. An EIR is prepared whenever the public agency finds substantial evidence that a project may have a significant effect on the environment (CEQA Guidelines §15064(a)(1)). A PEIR is an EIR prepared on a series of actions, characterized as one large project that are related geographically, as logical parts in a chain of contemplated actions, and/or in connection with the issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program (CEQA Guidelines §15168(a)). The public agency shall consider the information in the PEIR along with other information which may be presented to the agency.

While the information in the PEIR does not control the agency's ultimate discretionary review or decision on the project, the agency must respond to each significant effect identified in the PEIR by making findings under §15091 and, if necessary, by making a statement of overriding considerations under §15093. The information in the PEIR may constitute substantial evidence in the record to support the agency's action on the project if its decision is later challenged in court.

This PEIR serves three basic purposes. First, it identifies mitigation measures, included as policies and programs in the General Plan to avoid or reduce significant environmental effects associated with implementing the proposed plan. Second, it establishes the environmental framework for adoption of the proposed plan, providing information to the public, Planning Commission, and City Council concerning the potential consequences of adopting the plan. Third, it serves to streamline environmental review for subsequent projects that implement the proposed plan (e.g., specific plans, individual projects).

Significant Effect on the Environment

A significant effect on the environment is defined as a substantial adverse change in the physical conditions which exist in the area affected by the proposed project (CEQA Guidelines §15382). Further, when an EIR identifies a significant effect, the government agency approving the project must make findings on whether the adverse environmental effects have been substantially reduced -- or if not, why not (CEQA Guidelines §15091).

Use of Existing Information

This PEIR utilizes information from a variety of sources, including new and existing information. Where existing information is used, every effort has been made to use the most recent information. This is especially true with respect to demographic and economic information. Where such information is five to ten years old, it is not anticipated that the lack of more recent information would have substantive implications to the analysis because demographic and economic conditions have not changed appreciably over time in the City and are still applicable.

1.2 RELATIONSHIP OF THE GENERAL PLAN AND PEIR

The CEQA Guidelines provide the following directions concerning the coordination of planning and environmental impact assessment:

General

To the extent possible, the PEIR process should be combined with the existing planning, review, and project approval process used by each public agency (CEQA Guidelines §15080).

PEIR as Part of a General Plan

The requirements for preparing a PEIR on a local general plan, element, or amendment thereof, will be satisfied by using the General Plan as the PEIR, and no separate PEIR will be required, if:

- The general plan addresses all the points required to be in an PEIR by Article nine of these Guidelines; and
- The document contains a special section or a cover sheet identifying where the General Plan document addresses each of the points required (CEQA Guidelines §15166).

Although §15166 allows for streamlining of the General Plan preparation and environmental review processes by allowing for the a single joint General Plan and PEIR document, the City decided that, in this case, separate General Plan policy and PEIR documents would be prepared (e.g., the PEIR would be a separate appendix of the General Plan). The City made this decision in order to simplify the contents of the General Plan thus make it both more user friendly and more understandable to the general public.

While the General Plan policy document and this PEIR are separate documents, the PEIR provides input to General Plan policy and program development through an iterative process. This iterative process includes: (1) conducting an initial environmental evaluation of the proposed draft Land Use Diagram and draft policies/programs; (2) formulating mitigation measures to avoid or reduce potentially significant environmental effects associated with the implementation of the Land Use Diagram and policies/programs; (3) writing these mitigation measures into the General Plan as additional policies/programs; and (4) re-evaluating the General Plan with the added policies/programs.

In a sense the proposed General Plan is self-mitigating in that it includes policies and programs to avoid or reduce many of the significant environmental effects that would otherwise occur without the added policies/programs. Still, some significant impacts and mitigation measures are identified in the PEIR, but substantially fewer than would have otherwise been identified had this iterative process not occurred.

1.3 USE OF THIS EIR AS A PROGRAM EIR

Use of the PEIR

As a PIER under CEQA Guidelines §15168, this document evaluates the proposed General Plan's environmental impacts on a general level, rather than a project-specific level. The PEIR analysis is considered the first tier of environmental review, creating the basis on which future project-specific CEQA documents can build. A PEIR can be incorporated by reference into environmental documents prepared subsequently to address issues such as cumulative impacts and growth inducing impacts while allowing the subsequent documents to focus on new or site-specific impacts.

Use of a PEIR can provide the following advantages:

- Provide an occasion for a more exhaustive consideration of effects and alternatives than would be practical in a PEIR on an individual action;
- Ensure consideration of cumulative impacts that might be slighted in a case-by-case analysis;
- Avoid duplicative reconsideration of basic policy considerations;
- Allow the Lead Agency to consider broad policy alternatives and program-wide mitigation measures at an early point, when the agency has greater flexibility to deal with basic problems or cumulative impacts; and
- Allow reduction in paperwork.

A General Plan includes policies and programs intended to guide development and avoid or mitigate environmental impacts associated with such development. This PEIR analyzes the environmental impacts of implementing the proposed Land Use Diagram, policies and programs, as well as the effectiveness of these policies and programs in avoiding or mitigating significant impacts.

This Draft PEIR was prepared under the direction of the City of Fortuna, and provides for review by the public and by public agencies, as required. The Final EIR must be certified by the Fortuna City Council prior to adoption of the proposed General Plan.

As a PEIR, this document focuses on the General Plan's overall effect. The PIER analysis does not examine the effects of site specific projects that may occur within the overall 20-year time-frame of the General Plan. The nature of General Plans is such that many proposed policies are intended to be non-specific, with details to be worked out during implementation. Thus, many of the impacts and mitigation measures can only be described in general or qualitative terms.

Use of the PEIR with Later Activities (Tiering)

“Tiering” refers to using the analysis of general matters contained in a broader PEIR (such as one prepared for a general plan) with later EIRs and negative declarations on later projects, incorporating by reference the general discussion from the broader EIR and concentrating the later EIR or negative declaration solely on the issues specific to the later project (CEQA Guidelines §15152(a)).

Where a PEIR has been prepared and certified for a plan, a lead agency for a later project pursuant to or consistent with the General Plan, should limit an EIR or negative declaration on the later project to those effects that were not examined as ‘significant effects on the environment’ in the prior EIR (§15152(b)). Other guidance provided by the Guidelines with respect to tiering includes the following:

- If a later activity will have effects that were not examined in the PEIR, a new Initial Study will be prepared, leading to either an EIR or a Negative Declaration.
- If the agency finds that pursuant to CEQA Guidelines §15162 that no new effects could occur or that no new mitigation measures are required, the agency can approve the activity as being within the scope of the project covered by the PEIR, and no new environmental document will be required.
- An agency shall incorporate feasible mitigation measures and alternatives developed in the PEIR into subsequent actions in the program or project.
- Where the subsequent activities involve site-specific operations, the agency should use a written checklist (or equivalent method) to document the evaluation of the site, and the activity, to determine whether the environmental effects of the operation were covered in the PEIR.
- The PEIR will be most helpful in dealing with subsequent activities if it deals with the effects of the program as specifically and comprehensively as possible. With a good and detailed analysis of the program, many subsequent activities could be found to be within the scope of the project described in the PEIR, and no further environmental documents would be required.

Use of the PEIR also enables the Lead Agency to characterize the overall program as the project being approved at that time. Following this approach, when individual activities within the program are proposed, the agency would be required to examine the individual activities to determine whether the Draft EIR effects were fully analyzed in the PEIR. If the activities would have no effects beyond those analyzed in the PEIR, the agency could assert that the activities are part of the program which had been approved earlier, and no further CEQA compliance would be required. This approach offers many possibilities for agencies to reduce the Draft EIR costs of CEQA compliance and still achieve high levels of environmental protection.

1.4 FORECASTING, DEGREE OF SPECIFICITY AND SPECULATION

The CEQA Guidelines include the following discussions regarding forecasting, speculation, and the degree of specificity required in the PEIR:

Forecasting, Speculation, and Degree of Specificity

Drafting an EIR or preparing a Negative Declaration necessarily involves some degree of forecasting. An agency must use its best efforts to discover and disclose all that it reasonably can about the future (CEQA Guidelines §15144). If, after thorough investigation, a Lead Agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact (CEQA Guidelines §15145).

The degree of an EIR's specificity corresponds to the degree of specificity involved in the underlying activity (CEQA Guidelines §15146). For example, the degree of specificity for this PEIR is less than that which is required of a project EIR.

- An EIR on a construction project will necessarily be more detailed in the specific effects of the project than will be an EIR on the adoption of a local General Plan or comprehensive zoning ordinance, because the effects of the construction can be predicted with greater accuracy (CEQA Guidelines §15146(a)).
- An EIR on a project such as the adoption or amendment of a comprehensive zoning ordinance, or a local General Plan, should focus on the secondary effects that can be expected to follow from the adoption or amendment; however the EIR need not be as detailed as an EIR on the specific construction projects that might follow (CEQA Guidelines §15146(b)).

The PEIR analyzes the anticipated impacts of General Plan implementation. This analysis uses the current level of development that exists, as described in the General Plan Background Report, as a baseline. The impacts of additional development, whether from new uses or retrofitting of existing uses are considered, and thresholds are applied to determine the level of significance of the impact.

In this PEIR, the terms “buildout” and “2030” are both used. “Buildout” refers to the condition where the City is fully developed under the proposed General Plan, whereas 2030 refers to the time horizon of the proposed General Plan. While “buildout” and year 2030 conditions are not the same (for example residential buildout is estimated to occur around 2030 based on existing growth trends, while industrial buildout is estimated to occur around 2060 or 2070), this PEIR assumes that “buildout” occurs in 2030.

This PEIR makes this assumption for three reasons: (1) projections of future traffic, air and noise become increasingly speculative with time; (2) having to deal with two different future conditions in the PEIR would be confusing; and (3) evaluating buildout rather than some arbitrary interim condition (e.g., 2030) provides a conservative or worst-case analysis of the environmental effects of the proposed General Plan.

1.5 PEIR ORGANIZATION

The main body of this PEIR is divided into ten chapters:

Chapter 1 - Introduction. This chapter describes the purpose of the PEIR, the relationship between the General Plan and PEIR, the uses of the PEIR, the Degree of Specificity of the PEIR, and the organization of the PEIR.

Chapter 2 - Project Description and Impact Summary. This chapter describes the proposed General Plan and summarizes the potential impacts. A brief description of alternatives to the plan, plan objectives, and the General Plan's relationship to other plans and regulations is provided.

Chapter 3 - Land Use. This chapter provides an overview of existing land uses and land use regulations in the planning area, while also evaluating the proposed land use and housing impacts of implementing the proposed General Plan.

Chapter 4 - Transportation and Circulation. This chapter assesses transportation impacts, circulation, and alternative transportation modes.

Chapter 5 - Natural and Cultural Resources. This chapter examines the proposed General Plan's impacts on natural (water, biological, agricultural, mineral and soil) and cultural resources. It also analyzes energy use.

Chapter 6 - Parks, Recreation, and Open Space. This chapter assesses the impacts on Fortuna's parks, recreational facilities, and open space.

Chapter 7 - Public Facilities and Services. This chapter reviews potential impacts on public facilities and services, including water supply and distribution; wastewater collection, treatment, and disposal; stormwater drainage; law enforcement and fire protection services; schools; and public utilities (i.e., gas, electricity, and communications).

Chapter 8 - Public Health and Safety. This chapter reviews public health and safety impacts of the proposed General Plan, including seismic and geologic hazards, wildland and urban fire potential, flooding, hazardous materials, air quality (including climate change per AB 375 and greenhouse gas emissions per AB 32), and noise. The potential for public safety risk relating to aircraft is also analyzed.

Chapter 9 - Alternatives. This chapter evaluates the potential environmental effects of each of the project alternatives, compares these to those of the proposed General Plan, and identifies the environmentally superior alternative.

Chapter 10 - Cumulative Impacts and Other CEQA Topics. This chapter addresses several mandatory Draft EIR sections, including cumulative impacts, short-term versus long-term uses, significant irreversible effects, and growth-inducing impacts. It also contains the analysis of the proposed annexation areas.

For each environmental issue addressed in Chapters 3 through 8, the discussion is broken generally into the following five parts:

Environmental Setting. This section briefly summarizes pertinent information concerning existing conditions. Since the General Plan Background Report constitutes the comprehensive setting for the PEIR, this section focuses on the highlights, while referring the reader to appropriate sections of the Background Report.

Applicable Plans, Policies, Codes, and Regulations. This section references plans, policies, codes and regulations applicable to the impact topic, while also addressing specific policies contained in the existing and proposed General Plans.

Methodology. This section describes the policy background and analysis methodology used in the analysis.

Significance Thresholds. This section identifies the significance thresholds upon which the determination of significance of impacts is based. These thresholds are the Environmental Checklist questions contained in Appendix G of the State CEQA Guidelines.

Impacts and Mitigation. This section identifies any significant impacts due to the proposed General Plan, the significance of these impacts before mitigation, mitigation measures required to reduce or avoid these impacts, and the of significance of these impacts after mitigation. Any mitigation measures identified in this PEIR will be incorporated into the proposed General Plan as additional policies or programs.

1.6 PEIR PROCESS

Initiating the PEIR Process, the Notice of Preparation, and the Scoping Process

To initiate the PEIR process, a Notice of Preparation (NOP) was prepared and distributed on June 25, 2007. The NOP and responses received are included as Appendix A of this PEIR. The NOP was distributed to the State Clearinghouse, government agencies, special districts, organizations, and individuals with an interest in the General Plan Update. The distribution list is included as an NOP attachment. The release of the NOP also started the public scoping process. This was done to solicit early consultation on the PEIR scope. The 30 day comment period concluded on July 25, 2007. While not required, a public scoping meeting was held on July 9, 2007, during that 30 day comment period.

2008 Draft PEIR

In the first half of 2007, a Public Hearing Draft Background Report was prepared for the proposed General Plan. The Background Report, available from the City under separate cover, defined the existing environmental setting and was used as an input in preparing the proposed General Plan.

In the second half of 2007 and the first quarter of 2008, the City of Fortuna hosted a Citizens' Advisory Group (CAG) as another an input to preparing the proposed General Plan. In addition to the CAG, a series of Community Workshops were held. Public input workshop summaries are on the General Plan Update website <http://www.mintierharnish.com/projects/fortuna/index.html>. Several City Council hearings were also during this period to obtain input on the proposed plan.

In early 2008, the City prepared a proposed General Plan. On May 19, 2008, the City circulated a Draft PEIR ("2008 Draft PEIR") on the proposed plan. The 2008 Draft PEIR received substantial comments from responsible agencies and members of the public.

As a result of the public comments received on the 2008 Draft PEIR, comments by an attorney hired by the City to review the PEIR, requests by the City's Planning Commission (P.C.) to have a greater role in the formulation of the plan, the feeling among the City Council (C.C.) and planning staff that the General Plan process should have included more opportunities for P.C., C.C., and public input, and changes to the plan desired by the City (e.g., annexation of the Rohnerville Airport area, changes to the Land Use Diagram, etc.), the City decided to revise the proposed General Plan and prepare and circulate a new PEIR (e.g., the "2009 Draft PEIR" or "current PEIR").

2009 Draft PEIR

The 2009 Draft PEIR is a new EIR, however, it addresses the agency and public comments received on the 2008 Draft PEIR to the extent that the comments address substantive environmental issues.

This PEIR has been prepared in accordance with the California Environmental Quality Act, including the CEQA Statutes (Public Resources Code §21000-21178.1), CEQA Guidelines, and relevant court decisions. In accordance with CEQA, this PEIR:

- Assesses the expected environmental impacts resulting from the planned population, housing, and employment growth and implementation of the policies in the proposed General Plan;
- Identifies mitigation measures that could avoid or minimize potentially significant environmental impacts; and
- Evaluates alternatives to the proposed plan.

Because this PEIR identifies multiple impacts, CEQA requires that the City make one of the following findings concerning each of these impacts, to be included in the City Council staff report for certification of the PEIR:

- Changes have been required in the plan that will avoid or substantially reduce significant impacts;
- Such changes are the responsibility of another public agency; or
- Specific economic, social, or other considerations make the mitigation measures of the PEIR or plan alternative(s) infeasible.

The City of Fortuna will not approve the proposed General Plan unless all significant effects have been eliminated or reduced where feasible. Where significant impacts cannot be reduced to less than significant levels, the City will adopt a statement of overriding considerations, finding that the economic, legal, social, technological, or other benefits of the proposed General Plan outweigh its unavoidable adverse environmental effects.

The PEIR is a factual, objective, public-disclosure document that takes no position on the merits of the plan, but rather provides information on which decisions about the proposed General Plan and its effects can be based. The PEIR has been prepared according to professional standards and practices and in conformance with the legal requirements and informational expectations of CEQA and the State and local guidelines in place to implement it. PEIR preparers are listed in Chapter 11.

Public Review and Comment

Copies of the proposed General Plan and this Draft PEIR are available for review at the Fortuna City Hall, and online at <http://friendlyfortuna.com/index.aspx?nid=375>. The City will also circulate the document to public agencies, relevant organizations, and interested individuals. Comments may be submitted in writing, or orally, at a public hearing to be held by the City.

Comments should: (1) focus on the adequacy and completeness of the PEIR; and/or (2) address questions about the environmental consequences of the plan's implementation. In this case, "adequacy" is defined as the thoroughness of the PEIR in addressing significant environmental effects; identifying mitigation policies and programs for those impacts; and supplying enough information for public officials to make decisions about the merits of the General Plan. In order to keep the documents succinct and useful as decision-making tools, the CEQA Guidelines instruct EIRs to focus on significant impacts, and not address every imaginable effect. Comments on the Draft PEIR must be made before the close of the public review period and sent, delivered, or emailed to:

Stephen Avis AICP, Associate Planner
City of Fortuna
621 11th Street
Fortuna CA 95540
Email savis@ci.fortuna.ca.us

Final PEIR

Following the close of the public review period, a Final PEIR will be prepared that contains all the comments received during the public review period together with responses. The Final PEIR will be made available to agencies and the general public for review before the City certifies it as complete. No action can be taken on the proposed General Plan until the Final PEIR is certified; however, certification of the PEIR does not also signal or mandate approval of the General Plan.

1.7 PEIR SCOPE

CEQA Guidelines §15063(a) states that, following preliminary review, the lead agency shall conduct an initial study to determine whether a proposed project [or plan] may have a significant effect on the environment, and if it is determination is in the affirmative, the lead agency shall prepare an EIR. However, as permitted by §15063(a), the City did not prepare an initial study presuming that the proposed plan may have a significant effect on the environment, and initiated preparation of this PEIR.

One purpose of an initial study is to focus an EIR on the environmental issues for which a proposed project [or plan] may have significant effects on the environment. Environmental issues for which the project [or plan] would not have significant effects do not require further analysis in an EIR (CEQA Guidelines §15063(c)(3)). Because the City did not prepare an initial study, this PEIR is a fully scoped EIR (e.g., addresses all the environmental issues identified in the Environmental Checklist, Appendix G of the CEQA Guidelines), with the following exceptions:

1. Will the proposed plan substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings, within a state scenic highway.

Response is No – the Fortuna General Plan Planning Area is not visible from a state scenic highway (e.g., HWY 101 and SR 36 are not designated as state scenic highways within the vicinity of the Planning Area; Humboldt County 1984).

2. Will the proposed plan result in a safety hazard for people residing or working within the vicinity of a private airstrip?

Response is No – the Fortuna General Plan Planning Area does not contain, and is not located within the vicinity of, any private airstrips.

3. Will the proposed plan expose people or structures to a significant risk of loss, injury or death involving failure of a dam or inundation by a seiche¹ or tsunami?

Response is No – The Fortuna General Plan Planning Area: (1) is not located immediately downstream of a dam, the failure of which could result in significant flooding; (2) is not located adjacent to or directly downstream from lakes which could cause a seiche; and (3) is located well inland and not within a County-designated Tsunami Run-Up Zone (Humboldt County 2002).

4. Will the proposed plan physically divide an established community?

Response is No – the proposed plan does not include proposals for new development that could potentially physically divide the City of Fortuna (e.g., is a proposed program rather

¹ Seiche is defined as a free or standing wave oscillation of the surface of water in an enclosed or semi-enclosed basin (as in a lake, bay or harbor). It is generally caused by local changes in atmospheric pressure, aided by winds, tidal currents and small earthquakes (University of California, 2001).

than a proposed development project) - the proposed plan merely defines the future land uses permitted within the Planning Area through the proposed Land Use Diagram. Furthermore, the proposed Land Use Diagram does not propose or designate new highways, major industrial plants, aqueducts, or other facilities often associated with the division of established communities. Finally, the proposed plan designates new General Plan roadways, bicycle paths, and pedestrian paths, and includes policies and programs to foster new mass transit lines in un-served areas, and would thus increase rather than decrease connectivity within the City (a beneficial impact).

5. Will the proposed plan conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Response is No – the Fortuna General Plan Planning Area is not subject to an adopted HCP, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

6. Will the proposed plan expose people residing or working in the Planning Area to excessive noise levels from a private airstrip?

Response is No – the Fortuna General Plan Planning Area does not contain, and is not located within the vicinity of, any private airstrips.

7. Will the proposed plan displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

Response is No – the proposed plan is a plan to guide future development in the Planning Area rather than a development project, and will not displace people or housing. Furthermore, goals, policies and programs are proposed in the proposed plan that will require the preservation and protection of existing housing, and where the Land Use Diagram re-designates areas containing existing housing to non-residential uses, the existing housing in these areas will be permitted to continue (e.g., “grandfathered” in).

8. Will the proposed plan result in a change in air traffic patterns, including either an increase in air traffic levels or a change in location, that results in substantial safety risks?

Response is No – The proposed plan will increase the overall development potential of the Planning Area by up-designating certain parcels. This, in turn, will increase the resident and employee populations within the Planning Area compared to what would otherwise occur under the existing (1993) General Plan, potentially increasing passenger air travel out of Arcata-Eureka Airport and fire-fighting flights out of Rhonerville Airport. However, in neither case will any increases result in substantial safety risks because: (1) federal and state law requires the updating of airport master plans at regular intervals to accommodate increases in air traffic demand in a safe manner; (2) any increase in flights out of these airports associated with the proposed plan would be minor in comparison to the total increase in flights on a County-wide basis; and (3) the proposed plan includes proposals to comply with Humboldt County Airport Land Use

Compatibility Plan as it relates to the area around Rhonerville Airport so that changes will not be required in the location or operation of Rhonerville airport.

Note that the consistency of the proposed General Plan with the Humboldt County Airport Land Use Compatibility Plan as it relates to Rhonerville Airport is still evaluated in the PEIR, but this analysis occurs in the context of consistency with existing plans in Section 3.1 (Land Use) rather than in the context of traffic and safety risks in Section 4.1 (Transportation).

REFERENCES

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