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1.0 INTRODUCTION
This Final Environmental Impact Report (Final EIR or FEIR) was prepared in accordance with the California Environmental Quality Act (CEQA), the CEQA Guidelines (Section 15132). The City of Chico is the lead agency for the environmental review of the proposed City of Chico General Plan Update. This FEIR summarizes the expected environmental impacts resulting from adoption and implementation of the updated General Plan, as well as responds to comments received on the Draft EIR.

1.0 INTRODUCTION

1.1 BACKGROUND AND PURPOSE OF THE EIR

OVERVIEW OF CEQA REQUIREMENTS FOR PREPARATION OF AN EIR

The City of Chico, serving as the lead agency, has prepared this EIR to provide the public and responsible and trustee agencies with information about the potential environmental effects of the proposed General Plan Update. As set forth in the provisions of CEQA (Public Resources Code Sections 21000 through 21177) and implementing regulations (California Code of Regulations, Title 14 Sections 15000 et seq., the CEQA Guidelines), public agencies are charged with the duty to consider the environmental impacts of proposed development and to minimize these impacts where feasible while carrying out an obligation to balance a variety of public objectives, including economic, environmental, and social factors.

CEQA Guidelines Section 15121(a) states that an EIR is an informational document for decision-makers and the general public that analyzes the significant environmental effects of a project, identifies possible ways to minimize significant effects, and describes reasonable alternatives to the project that could reduce or avoid its adverse environmental impacts.

CEQA requires the preparation of an environmental impact report prior to approving any project which may have a significant effect on the environment. For the purposes of CEQA, the term “project” refers to the whole of an action which has the potential to result in a direct physical change or a reasonably foreseeable indirect physical change in the environment (CEQA Guidelines Section 15378(a)). With respect to the proposed Chico General Plan Update, the City has determined that adoption and implementation of the updated General Plan is a project under this definition.

BACKGROUND OF ENVIRONMENTAL REVIEW PROCESS OF THE PROJECT

The following is an overview of the environmental review process for the Chico General Plan Update that has led to the preparation of this FEIR.

Notice of Preparation and Initial Study

In accordance with Section 15062 of the CEQA Guidelines, the City prepared a Notice of Preparation (NOP) of an EIR for the proposed project on December 10, 2008. The City was identified as the lead agency for the proposed project. This notice was circulated to the State Clearinghouse and to the public, local, state, and federal agencies, and other interested parties to solicit comments on the proposed project. The NOP was posted on the City's website. Two scoping meetings were held on January 13, 2009, to receive comments. Concerns raised in response to the NOP were considered during preparation of the Draft EIR. The NOP and responses by interested parties are presented in Appendix A of the Draft EIR. An Initial Study for the project was prepared and released for public review along with the NOP. Its conclusions supported preparation of an EIR for the project. The Initial Study is also included in Appendix A of the Draft EIR.
1.0 INTRODUCTION

Draft EIR

The Draft EIR (DEIR) was released for public and agency review on September 30, 2010. The public comment period was from September 30, 2010, to November 30, 2010. A public comment meeting on the DEIR was held on November 9, 2010.

The DEIR contains a description of the project, description of the environmental setting, identification of project impacts, and mitigation measures for impacts found to be significant, as well as an analysis of project alternatives. The Draft EIR was provided to interested public agencies and the public and was made available for review at the following locations: City of Chico Planning Services Department, 411 Main Street, Chico; Butte County Library, Chico Branch, 1106 Sherman Avenue, Chico; and Meriam Library, Special Collections, 3rd floor, CSU, Chico. The Draft EIR was also available on the City’s website at http://www.ci.chico.ca.us/.

Final EIR

The City received nine comment letters from agencies, interest groups, and the public regarding the Draft EIR, as well as verbal comments heard at the public comment meeting. This document responds to the written and verbal comments received as required by CEQA. This document also contains minor edits to the Draft EIR, which are included in Section 4.0, Minor Revisions to the Draft EIR, and details changes made to the General Plan Update since public release of the DEIR in Section 5.0, Minor Revisions to the Proposed General Plan. This document constitutes the FEIR.

Certification of the Final EIR/Project Consideration

The City will review and consider the FEIR. If the City finds that the FEIR is “adequate and complete,” the City may certify the FEIR. The rule of adequacy generally holds that the EIR can be certified if: (1) it shows a good faith effort at full disclosure of environmental information; and (2) it provides sufficient analysis to allow decisions to be made regarding the project in contemplation of its environmental consequences.

Upon review and consideration of the Final EIR, the City may take action to adopt, revise, or reject the proposed Chico General Plan Update. A decision to adopt the Chico General Plan Update would be accompanied by written findings and a Statement of Overriding Considerations for significant and unavoidable impacts in accordance with CEQA Guidelines Section 15091 and Section 15093. Public Resources Code Section 21081.6 also requires lead agencies to adopt a mitigation monitoring and reporting program to describe measures that have been adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment.

1.2 TYPE OF DOCUMENT

The CEQA Guidelines identify several types of EIRs, each applicable to different project circumstances. This EIR has been prepared as a Program EIR pursuant to CEQA Guidelines Section 15168 which states:

A program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either:

(1) Geographically,
(2) As logical parts in the chain of contemplated actions,

(3) In connection with issuance of rules, regulations, plans or other general criteria
to govern the conduct of a continuing program, or

(4) As individual activities carried out under the same authorizing statutory or
regulatory authority and having generally similar environmental effects which
can be mitigated in similar ways.

The program-level analysis considers the broad environmental effects of the overall proposed
General Plan Update. This EIR will be used to evaluate subsequent projects and activities under
the proposed General Plan. Additional environmental review under CEQA for various actions
taken to implement the proposed General Plan may be required based on the subsequent
project’s consistency with the General Plan and the analysis in this EIR. As individual projects or
activities under the General Plan Update are proposed, the City will be required to examine the
projects or activities to determine whether their effects were adequately analyzed in the
program EIR (CEQA Guidelines Section 15168). If the projects or activities would have no effects
beyond those analyzed in this EIR, no further CEQA review would be required.

1.3 INTENDED USES OF THE EIR

This EIR is intended to evaluate the environmental impacts of the project to the greatest extent
possible. This EIR should be used as the primary environmental document to evaluate all
subsequent planning and permitting actions associated with projects in the city that are
consistent with the General Plan. Subsequent actions that may be associated with the proposed
General Plan Update are identified in Section 3.0, Project Description, of the Draft EIR.

1.4 ORGANIZATION AND SCOPE OF THE FINAL EIR

This document is organized in the following manner:

SECTION 1.0 – INTRODUCTION

Section 1.0 provides an overview of the EIR process to date and what the FEIR is required to
contain.

SECTION 2.0 – EXECUTIVE SUMMARY

Section 2.0 includes an updated Executive Summary that provides a brief project description
and presents a summary table of probable environmental effects.

SECTION 3.0 – COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

Section 3.0 provides a list of commenters, copies of written comments (coded for reference),
and the responses to those written comments made on the Draft EIR.

SECTION 4.0 – MINOR REVISIONS TO THE DRAFT EIR

This section consists of revisions to the Draft EIR that are a result of responses to comments, as
well as minor staff edits that do not change the intent or content of the analysis or mitigation
measures. Revisions appear in strikethrough and underline.
SECTION 5.0 – MINOR REVISIONS TO THE PROPOSED GENERAL PLAN

This section consists of revisions to the proposed General Plan Update since public release of the DEIR.
2.0 EXECUTIVE SUMMARY
This section provides an overview of the proposed City of Chico General Plan Update and its environmental analysis. For additional detail regarding specific issues, please consult the appropriate chapter of Sections 4.1 through 4.14 (Environmental Setting, Impacts, and Mitigation Measures) of the Draft Environmental Impact Report (Draft EIR).

2.1 PURPOSE AND SCOPE OF THE ENVIRONMENTAL IMPACT REPORT

The Environmental Impact Report (EIR) will provide, to the greatest extent possible, an analysis of the potential environmental effects associated with the implementation of the General Plan, pursuant to the California Environmental Quality Act (CEQA).

This EIR analysis focuses upon potential environmental impacts that could arise from implementation of the General Plan Update through development of the land uses within the Planning Area, as regulated and guided by General Plan policies and action items. The EIR adopts this approach in order to provide a credible worst-case scenario of the impacts resulting from project implementation.

2.2 PROJECT CHARACTERISTICS

The proposed project is the adoption and implementation of an updated General Plan for the City of Chico. The updated City of Chico General Plan would replace the existing General Plan, which was originally adopted in 1994 and last comprehensively updated in 1999. The proposed General Plan Update builds off the goals and vision developed through public outreach and the visioning process conducted by the City to ensure that the public and project stakeholders were given the opportunity to provide meaningful input and guidance for the General Plan Update effort.

The proposed City of Chico General Plan Update is comprised of a Land Use Diagram and policy document that contains 12 elements. Each of the elements identifies goals and associated policies and action items. State law requires that general plans address seven topics: land use, circulation, housing, conservation, open space, noise, and safety. The proposed General Plan Update covers all of these topics plus several additional issues, for a total of 12 elements. In keeping with the state-mandated schedule, the City’s Housing Element was updated separately in 2009, with separate environmental review. Thus, while the Housing Element will be incorporated into the proposed General Plan Update upon its adoption, this environmental document does not cover that component of the project. For a brief description of each element, please refer to Section 3.0, Project Description of the Draft EIR.

2.3 PROJECT ALTERNATIVES SUMMARY

CEQA Guidelines Section 15126.6 requires that an EIR describe a range of reasonable alternatives to the project that could feasibly attain the basic objectives of the project and avoid and/or lessen the environmental effects of the project. Further, CEQA Guidelines Section 15126.6(e) requires that a “no project” alternative be evaluated in an EIR. This alternatives analysis provides a comparative analysis between the project and the selected alternatives. The Draft EIR qualitatively evaluated the following land use alternatives:

- **Alternative 1 - Existing General Plan Alternative (No Project Alternative).** Alternative 1 represents a continuation of the existing 1994 General Plan and associated development in the Planning Area. This alternative includes the existing General Plan Land Use Diagram that was established for the community in 1994 (and updated in 1999), including subsequent General Plan amendments.
• **Alternative 2 - Expanded Urban Development Alternative.** Alternative 2 has the largest development footprint area of the alternatives. In this alternative, development is distributed more widely throughout the Planning Area, with less emphasis on increasing densities and intensities. Expansion is focused on the north/south corridor, southeast area, and beyond the Greenline to the west. This land use alternative represents a continuation of existing development patterns and uses, but with the inclusion of more mixed-use development.

• **Alternative 3 - Increased Density Alternative.** Alternative 3 directs development toward existing urban areas. Higher-density development would occur through infill and redevelopment of the 15 Opportunity Sites, and limited expansion would occur north and south in three Special Planning Areas (North Chico, Diamond Match, and South Entler) with no expansion to the east or west beyond the Greenline. This alternative assumes significant redevelopment of mixed uses and medium and higher densities in new development.

### 2.4 Areas of Controversy

The City of Chico was identified as the lead agency for the proposed project. In accordance with Section 15082 of the CEQA Guidelines, the City of Chico prepared and distributed a Notice of Preparation (NOP) and Initial Study (IS) for the City of Chico General Plan Update that was circulated for public review on December 10, 2008. The NOP and IS included a summary of probable effects on the environment from the implementation of the project. Written comments received in response to the NOP were considered in the preparation of the Draft EIR. The issues raised in the NOP response letters included transportation and traffic, scenic resources, planning and land use, public services, climate change, hazards, air quality, cultural resources, and noise. Section 1.0, Introduction, of the Draft EIR provides a summary of issues and areas of concern related to the proposed General Plan Update and the Draft EIR, as presented to the City by agencies and the public during the NOP review period. The complete text of the NOP and NOP comments were included as Appendix A to the Draft EIR.

### 2.5 Summary of Environmental Impacts

**Table 2.0-1** displays a summary of impacts for the proposed General Plan Update and proposed mitigation measures that would avoid or minimize potential impacts. In the table, the level of significance is indicated both before and after the implementation of each mitigation measure.

For detailed discussions of all mitigation measures and of proposed General Plan policies and action items that would provide mitigation for each type of environmental impact addressed in the EIR, refer to the appropriate environmental topic section in the Draft EIR (i.e., Sections 4.1 through 4.14).
### Table 2.0-1
**SUMMARY OF IMPACTS AND MITIGATION MEASURES**

<table>
<thead>
<tr>
<th>Impact</th>
<th>Level of Significance Without Mitigation</th>
<th>Mitigation Measure</th>
<th>Resulting Level of Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Land Use</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Impact 4.1.1</td>
<td>Implementation of the proposed General Plan Update would not result in the division of an existing community nor would it result in substantial land use compatibility issues.</td>
<td>NI</td>
<td>None required.</td>
</tr>
<tr>
<td>Impact 4.1.2</td>
<td>Implementation of the proposed General Plan Update could lead to inconsistency with other land use plans and ordinances, including the City’s land use plans and regulations that address physical effects to the environment.</td>
<td>LS</td>
<td>None required.</td>
</tr>
<tr>
<td>Impact 4.1.3</td>
<td>The Butte Regional Habitat Conservation Plan (HCP) and Natural Community Conservation Plan (NCCP) has not yet been adopted. However, the proposed General Plan Update would support the HCP effort.</td>
<td>LS</td>
<td>None required.</td>
</tr>
<tr>
<td>Impact 4.1.4</td>
<td>Implementation of the proposed General Plan Update, in addition to existing, proposed, approved, and reasonably foreseeable development in the City of Chico and Butte County, would contribute to cumulative land use impacts associated with the division of an established community or conflicts with land use plans and regulations that provide environmental</td>
<td>LCC</td>
<td>None required.</td>
</tr>
</tbody>
</table>
### Impact 4.2.1
Implementation of the proposed General Plan Update would result in the conversion of important farmlands (Prime Farmland, Unique Farmland, Farmland of Statewide Importance) as designated by the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use.

- **Level of Significance Without Mitigation**: SU
- **Mitigation Measure**: None available.
- **Resulting Level of Significance**: SU

### Impact 4.2.2
Implementation of the proposed General Plan Update would not involve any land use changes for parcels currently under a Williamson Act Contract. However, proposed land uses would result in the re-designation of some land areas in the proposed Sphere of Influence, yet currently zoned for agriculture in the Butte County General Plan. Although these lands are under Butte County jurisdiction, City re-designation to non-agricultural uses would result upon annexation into the City.

- **Level of Significance Without Mitigation**: LS
- **Mitigation Measure**: None required.
- **Resulting Level of Significance**: LS

### Impact 4.2.3
Implementation of the proposed General Plan Update could result in changes in the existing environment which, due to their location or nature, could result in conversion of farmland to nonagricultural use. However, policy provisions in the proposed General Plan Update and continued protection.

- **Level of Significance Without Mitigation**: LS
- **Mitigation Measure**: None required.
- **Resulting Level of Significance**: LS
### Impact 4.2.4
Implementation of the proposed General Plan Update, along with regional and statewide growth, would result in a contribution to the conversion of important farmland.

<table>
<thead>
<tr>
<th>Impact</th>
<th>Implementation of the City of Chico Agricultural Preservation Standards under the Municipal Code would ensure that agricultural operations are not adversely impacted.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Level of Significance Without Mitigation</td>
<td>CC/SU</td>
</tr>
</tbody>
</table>

### Population/Housing/Employment

#### Impact 4.3.1
Subsequent land use activities associated with implementation of the proposed General Plan Update would accommodate anticipated residential and employment anticipated by the year 2030 as well as additional growth capacity beyond the year 2030.

<table>
<thead>
<tr>
<th>Impact</th>
<th>Subsequent land use activities associated with implementation of the proposed General Plan Update would accommodate anticipated residential and employment anticipated by the year 2030 as well as additional growth capacity beyond the year 2030.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Level of Significance Without Mitigation</td>
<td>LS</td>
</tr>
</tbody>
</table>

#### Impact 4.3.2
Subsequent land use activities associated with implementation of the proposed General Plan Update would not result in the displacement of substantial numbers of housing or persons.

<table>
<thead>
<tr>
<th>Impact</th>
<th>Subsequent land use activities associated with implementation of the proposed General Plan Update would not result in the displacement of substantial numbers of housing or persons.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Level of Significance Without Mitigation</td>
<td>LS</td>
</tr>
</tbody>
</table>

#### Impact 4.3.3
Subsequent land use activities associated with implementation of the proposed General Plan Update, in addition to existing, approved, proposed, and reasonably foreseeable development, could result in a cumulative increase in population and housing growth in the City of Chico as well as in the surrounding Butte County.

<table>
<thead>
<tr>
<th>Impact</th>
<th>Subsequent land use activities associated with implementation of the proposed General Plan Update, in addition to existing, approved, proposed, and reasonably foreseeable development, could result in a cumulative increase in population and housing growth in the City of Chico as well as in the surrounding Butte County.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Level of Significance Without Mitigation</td>
<td>LCC</td>
</tr>
</tbody>
</table>
## 2.0 Executive Summary

<table>
<thead>
<tr>
<th>Impact</th>
<th>Level of Significance Without Mitigation</th>
<th>Mitigation Measure</th>
<th>Resulting Level of Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td>County region, along with associated environmental impacts. However, implementation of the proposed General Plan Update would accommodate anticipated residential and employment growth in an efficient and compact manner.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Human Health/Risk of Upset

| Impact 4.4.1 | Implementation of the proposed General Plan Update would not expose people or structures to significant hazards involving wildland fires including in areas where wildlands are adjacent to urbanized areas. | LS | None required. | LS |
| Impact 4.4.2 | Implementation of the proposed General Plan Update would not result in a safety hazard for people residing or working in the vicinity of a public or private airport in the Planning Area. | LS | None required. | LS |
| Impact 4.4.3 | Implementation of the proposed General Plan Update would allow for land uses that would involve the routine transportation, use, or disposal of hazardous materials in the Planning Area. Such activities would continue to be regulated in order to protect public health and will not create a significant hazard to the public or the environment. | LS | None required. | LS |
| Impact 4.4.4 | Implementation of the proposed General Plan Update could create a significant hazard to the public or the environment through reasonably | LS | None required. | LS |
### Impact

<table>
<thead>
<tr>
<th>Impact</th>
<th>Level of Significance Without Mitigation</th>
<th>Mitigation Measure</th>
<th>Resulting Level of Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td>foreseeable upset and accident conditions involving the release of hazardous materials into the environment or by locating development on a site included on a list of hazardous materials sites compiled by Government Code Section 65962.5. Such activities and circumstances would continue to be regulated in order to protect public health and will not create a significant hazard to the public or the environment.</td>
<td>LS</td>
<td>None required.</td>
<td>LS</td>
</tr>
</tbody>
</table>

Impact 4.4.5

Implementation of the proposed General Plan Update would not result in significant emission of hazardous emissions or significant handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

LS

None required.

LS

Impact 4.4.6

Implementation of the proposed General Plan Update would not impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan.

LS

None required.

LS

Impact 4.4.7

Potential development under the proposed General Plan Update, along with increased urban development in Butte County, would not result in cumulative wildland fire hazard impacts.

LCC

None required.

LCC

---


City of Chico
January 2011

General Plan Update
Final Environmental Impact Report

2.0-7
## Traffic and Circulation

| Impact 4.5.1 | Implementation of the proposed General Plan Update would result in acceptable traffic operations on City roadway facilities. | LS | None required. | LS |
| Impact 4.5.2 | Implementation of the proposed General Plan Update would result in an increase in traffic volumes on state facilities that would operate below Caltrans LOS thresholds under year 2030 conditions. | S | None available. | SU |
| Impact 4.5.3 | Implementation of the proposed General Plan Update would result in an increase in demand for public transit services in the Planning Area. However, implementation of proposed General Plan Update policy provisions would not conflict with policies, plans, or programs supporting alternative transportation or increase demand for transit facilities greater than planned capacity. | LS | None required. | LS |
| Impact 4.5.4 | Implementation of the proposed General Plan Update would result in an increase in the demand for pedestrian and bicycle infrastructure. However, implementation of proposed General Plan would not result in adverse affects to existing bikeways or pedestrian facilities that would discourage their use or result in safety issues. | LS | None required. | LS |
### 2.0 EXECUTIVE SUMMARY

<table>
<thead>
<tr>
<th>Impact</th>
<th>Level of Significance Without Mitigation</th>
<th>Mitigation Measure</th>
<th>Resulting Level of Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Impact 4.5.5</td>
<td>LS</td>
<td>None required.</td>
<td>LS</td>
</tr>
<tr>
<td>Implementation of the proposed General Plan Update would result in an increase in traffic volumes that could result in the greater potential for roadway or traffic hazards.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Impact 4.5.6</td>
<td>LS</td>
<td>None required.</td>
<td>LS</td>
</tr>
<tr>
<td>Implementation of the proposed General Plan Update would result in an increase in traffic volumes, which could increase the potential opportunities for safety conflicts as well as potential conflicts with emergency access. However, implementation of the proposed General Plan Update would not result in inadequate emergency access.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Impact 4.5.7</td>
<td>CC</td>
<td>None required.</td>
<td>CC/SU</td>
</tr>
<tr>
<td>When considered with existing, proposed, planned, and approved development in the region, implementation of the proposed General Plan Update would contribute to cumulative traffic volumes in the region that result in significant impacts to level of service and operations.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Air Quality

| Impact 4.6.1 | LS | None required. | LS |
| Subsequent land use activities associated with implementation of the proposed General Plan Update would not conflict with or obstruct implementation of the Northern Sacramento Valley Planning Area 2006 Air Quality Attainment Plan. The proposed General Plan Update also includes several policy provisions that... |
### 2.0 EXECUTIVE SUMMARY

<table>
<thead>
<tr>
<th>Impact</th>
<th>Level of Significance Without Mitigation</th>
<th>Mitigation Measure</th>
<th>Resulting Level of Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>would further assist in air quality attainment efforts.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Impact 4.6.2</td>
<td>Subsequent land use activities associated with implementation of the proposed General Plan Update could result in short-term construction emissions that could violate or substantially contribute to a violation of federal and state standards for ozone and coarse and fine particulate matter.</td>
<td>PS</td>
<td>None available.</td>
</tr>
<tr>
<td>Impact 4.6.3</td>
<td>Subsequent land use activities associated with implementation of the proposed General Plan Update could result in long-term, operational emissions that could violate or substantially contribute to a violation of federal and state standards for ozone and coarse and fine particulate matter.</td>
<td>S</td>
<td>None available.</td>
</tr>
<tr>
<td>Impact 4.6.4</td>
<td>Implementation of the proposed General Plan Update would result in increased population and employment that would increase traffic volumes on area roadways. This could result in elevated carbon monoxide emissions from motor vehicle congestion that could expose sensitive receptors to elevated carbon monoxide concentrations. However, traffic volumes would not be large enough to generate excessive carbon monoxide emission levels.</td>
<td>LS</td>
<td>None required.</td>
</tr>
<tr>
<td>Impact 4.6.5</td>
<td>Subsequent land use activities associated with implementation of the</td>
<td>LS</td>
<td>None required.</td>
</tr>
</tbody>
</table>


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*Final Environmental Impact Report*  
*January 2011*
<table>
<thead>
<tr>
<th>Impact</th>
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</tr>
</thead>
<tbody>
<tr>
<td>proposed General Plan Update could result in projects that would include sources of toxic air contaminants which could affect surrounding land uses. Subsequent land use activities could also place sensitive land uses near existing sources of toxic air contaminants. These factors could result in the exposure of sensitive receptors to substantial pollutant concentrations such as toxic air contaminants. However, Butte County Air Quality Management District and state regulations would address exposure to toxic air contaminants.</td>
<td>LS</td>
<td>None required.</td>
<td>LS</td>
</tr>
<tr>
<td>Subsequent land use activities associated with implementation of the proposed General Plan Update could include sources that could create objectionable odors affecting a substantial number of people or expose new residents to existing sources of odor. However, continued implementation of BCAQMD rules and regulations and proposed General Plan Update policy provisions would address this issue.</td>
<td>LS</td>
<td>None required.</td>
<td>LS</td>
</tr>
<tr>
<td>Implementation of the proposed General Plan Update, in combination with cumulative development in the Sacramento Valley Air Basin, would result in a cumulatively considerable net increase of ozone and coarse and fine particulate matter.</td>
<td>CC</td>
<td>None available.</td>
<td>CC/SU</td>
</tr>
</tbody>
</table>

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</tr>
</thead>
<tbody>
<tr>
<td>Noise</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Impact 4.7.1 The proposed General Plan Update could result in exposure of persons to or generation of noise levels in excess of City standards as well as a substantial permanent increase in ambient noise levels in the City. However, the proposed Chico General Plan Update policy provisions would adequately address noise issues.</td>
<td>LS</td>
<td>None required.</td>
<td>LS</td>
</tr>
<tr>
<td>Impact 4.7.2 Traffic conditions under the proposed General Plan Update could result in a substantial permanent increase in ambient noise levels that could adversely affect noise-sensitive land uses. In addition, future development of noise-sensitive land uses could be exposed to roadway and/or railroad noise levels in excess of the City’s noise standards.</td>
<td>S</td>
<td>None available.</td>
<td>SU</td>
</tr>
<tr>
<td>Impact 4.7.3 Subsequent development associated with the proposed General Plan Update could result in new noise-sensitive land uses encroaching upon existing or proposed stationary noise sources or new stationary noise sources encroaching upon existing or proposed noise-sensitive land uses.</td>
<td>S</td>
<td>None available.</td>
<td>SU</td>
</tr>
<tr>
<td>Impact 4.7.4 Subsequent development under the proposed General Plan Update could result in exposure of persons to or generation of excessive groundborne vibration levels. However, substantial</td>
<td>LS</td>
<td>None required.</td>
<td>LS</td>
</tr>
</tbody>
</table>


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### Impact 4.7.5
Construction activities associated with subsequent activities under the proposed General Plan Update could result in a substantial temporary or periodic increase in ambient noise levels. However, the proposed Chico General Plan Update policy provisions and continued implementation of the City Municipal Code would adequately address construction noise issues.

<table>
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</thead>
<tbody>
<tr>
<td>LS</td>
<td>None required.</td>
<td>LS</td>
</tr>
</tbody>
</table>

### Impact 4.7.6
Sensitive land uses constructed near Chico Municipal Airport, Ranchaero Airport, and the Enloe Medical Center could be exposed to aircraft noise in excess of applicable noise standards for land use compatibility.

<table>
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</thead>
<tbody>
<tr>
<td>LS</td>
<td>None required.</td>
<td>LS</td>
</tr>
</tbody>
</table>

### Impact 4.7.7
Implementation of the proposed General Plan Update, in combination with other development in nearby unincorporated areas of the county, would increase transportation noise along area roadways.

<table>
<thead>
<tr>
<th>Level of Significance Without Mitigation</th>
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<th>Resulting Level of Significance</th>
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</thead>
<tbody>
<tr>
<td>CC</td>
<td>None available.</td>
<td>CC/SU</td>
</tr>
</tbody>
</table>

### Geology and Soils

#### Impact 4.8.1
Subsequent land use activities associated with implementation of the proposed General Plan Update could result in the exposure of more people, structures, and infrastructure to seismic hazards. However, policy provisions in

<table>
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<tr>
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<th>Resulting Level of Significance</th>
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<tbody>
<tr>
<td>LS</td>
<td>None required.</td>
<td>LS</td>
</tr>
<tr>
<td>Impact</td>
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<td>Mitigation Measure</td>
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<tr>
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<td>-------------------</td>
</tr>
<tr>
<td>the proposed General Plan Update and continued implementation of the City’s Municipal Code would ensure that people, structures, and infrastructure are not adversely impacted by seismic hazards.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Impact 4.8.2</td>
<td>LS</td>
<td>None required.</td>
</tr>
<tr>
<td>Implementation of the proposed General Plan Update could result in construction and grading activities that could expose topsoil and increase soil erosion. However, policy provisions in the proposed General Plan Update and continued implementation of the City’s Municipal Code would ensure that there are no adverse impacts from erosion and loss of topsoil.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Impact 4.8.3</td>
<td>LS</td>
<td>None required.</td>
</tr>
<tr>
<td>Implementation of the proposed General Plan Update could allow for development on a geologic unit or soil that is unstable, thus creating substantial risks to life and property. However, policy provisions in the proposed General Plan Update and continued implementation of the City’s Municipal Code would ensure that potential development is not adversely impacted by unstable soils.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Impact 4.8.4</td>
<td>LS</td>
<td>None required.</td>
</tr>
<tr>
<td>Subsequent land use activities associated with implementation of the proposed General Plan Update may allow for development in areas where sewers are not available for the disposal of wastewater and where soils are incapable of adequately supporting</td>
<td></td>
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<tr>
<td>Impact</td>
<td>Level of Significance Without Mitigation</td>
<td>Mitigation Measure</td>
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<td>--------------------</td>
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<tr>
<td>the use of septic tanks or alternative wastewater disposal systems. However, policy provisions in the proposed General Plan Update would ensure no adverse impacts from soils incapable of supporting septic tanks.</td>
<td>LCC</td>
<td>None required.</td>
</tr>
<tr>
<td>Impact 4.8.5 Subsequent land use activities associated with implementation of the proposed General Plan Update, in combination with other existing, planned, proposed, and reasonably foreseeable development in the region, may result in cumulative geologic and soil hazards. However, policy provisions in the proposed General Plan Update and continued implementation of the City’s Municipal Code would ensure that potential development is not adversely impacted by cumulative geologic and soil hazards.</td>
<td>LS</td>
<td>None required.</td>
</tr>
</tbody>
</table>

**Hydrology and Water Quality**

| Impact 4.9.1 Implementation of the proposed General Plan Update could result in a violation of water quality standards; substantial alteration of the existing drainage pattern, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion, siltation, and/or environmental harm; polluted stormwater runoff; or otherwise degrade water quality. However, implementation of proposed General | LS | None required. | LS |
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<thead>
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</thead>
<tbody>
<tr>
<td>Plan Update policy provisions and continued implementation of City standards would ensure that water quality impacts are addressed.</td>
<td>LS</td>
<td>None required.</td>
<td>LS</td>
</tr>
<tr>
<td><strong>Impact 4.9.2</strong> Implementation of the proposed General Plan Update could result in the degradation of groundwater quality and may violate water quality standards and/or degrade water quality resulting from future land uses. However, implementation of proposed General Plan Update policy provisions and continued implementation of City standards would ensure that groundwater quality is protected.</td>
<td>LS</td>
<td>None required.</td>
<td>LS</td>
</tr>
<tr>
<td><strong>Impact 4.9.3</strong> Implementation of the proposed General Plan Update could result in a substantial alteration of an existing drainage pattern, including through the alteration of the course of a stream or river, which may substantially increase the rate of amount of surface runoff in a manner which would result in flooding on- or off-site or could result in the creation or contribution of runoff water which would exceed the capacity of existing or planned stormwater drainage system. However, implementation of proposed General Plan Update policy provisions and continued implementation of City standards would ensure that drainage is adequately addressed.</td>
<td>LS</td>
<td>None required.</td>
<td>LS</td>
</tr>
<tr>
<td>Impact</td>
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<td>Mitigation Measure</td>
<td>Resulting Level of Significance</td>
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</tr>
<tr>
<td>Impact 4.9.4</td>
<td>LS</td>
<td>None required.</td>
<td>LS</td>
</tr>
<tr>
<td>Impact 4.9.5</td>
<td>LCC</td>
<td>None required.</td>
<td>LCC</td>
</tr>
<tr>
<td>Impact 4.9.6</td>
<td>LCC</td>
<td>None required.</td>
<td>LCC</td>
</tr>
</tbody>
</table>

Implementation of the proposed General Plan Update may result in the placement of housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map, or other flood hazard delineation map; and as a result impede or redirect flood flows exposing people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of a failure of a levee or dam. However, implementation of proposed General Plan Update policy provisions and continued implementation of City standards would ensure that flooding is adequately addressed.

Land uses and growth under the proposed General Plan Update, in combination with current land uses in the surrounding region, could introduce substantial grading, site preparation, and an increase in urbanized development.

Implementation of the proposed General Plan Update could increase impervious surfaces and alter drainage conditions and rates in the Planning Area, which could contribute to cumulative flood conditions downstream.
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</thead>
<tbody>
<tr>
<td><strong>Biological Resources</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Impact 4.10.1</td>
<td>LS</td>
<td>None required.</td>
<td>LS</td>
</tr>
<tr>
<td>Land uses and development consistent with the proposed General Plan Update could result in adverse effects, either directly or indirectly on special-status plant and animal species and sensitive and critical habitats in the Planning Area. However, implementation of General Plan Update policy provision would address this impact.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Impact 4.10.2</td>
<td>LS</td>
<td>None required.</td>
<td>LS</td>
</tr>
<tr>
<td>Land uses and development consistent with the proposed General Plan Update could interfere with the movement of native resident or migratory fish or wildlife species as well as use of native wildlife nursery sites. These land uses could also restrict the range of special-status species in the Planning Area.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Impact 4.10.3</td>
<td>NI</td>
<td>None required.</td>
<td>NI</td>
</tr>
<tr>
<td>No Habitat Conservation Plan (HCP), recovery plan, or natural community conservation plan has been adopted encompassing all or portions of the City of Chico. The General Plan Update would not conflict with Chico Municipal Code Chapter 16.66 (Tree Preservation Regulations) that regulates the removal and preservation of trees on undeveloped parcels within the city.</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Impact 4.10.4</td>
<td>The proposed General Plan Update, in combination with other reasonably foreseeable projects, would result in direct and indirect mortality and loss of habitat for special-status species, sensitive and/or critical habitat.</td>
<td>CC</td>
<td>None available.</td>
</tr>
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</tr>
<tr>
<td>Impact 4.11.1</td>
<td>Subsequent activities under the proposed General Plan Update could potentially cause a direct substantial adverse change in the significance of a historical resource or structure. However, policy provisions in the proposed General Plan Update, existing Best Management Practices (BMPs), and continued implementation of the city’s Municipal Code would ensure that historic resources are not adversely impacted.</td>
<td>LS</td>
<td>None required.</td>
</tr>
<tr>
<td>Impact 4.11.2</td>
<td>Subsequent activities under the proposed General Plan Update could result in the potential disturbance of cultural resources (i.e., prehistoric archaeological sites, historical archaeological sites, and isolated artifacts and features) and human remains. However, policy provisions in the proposed General Plan Update would ensure that archaeological resources are not adversely impacted.</td>
<td>LS</td>
<td>None required.</td>
</tr>
<tr>
<td>Impact 4.11.3</td>
<td>Adoption of the proposed General Plan Update could result in the potential disturbance of paleontological</td>
<td>LS</td>
<td>None required.</td>
</tr>
</tbody>
</table>
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<thead>
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</thead>
<tbody>
<tr>
<td>Impact 4.11.4</td>
<td>Implementation of the proposed General Plan Update, in addition to existing, approved, proposed, and reasonably foreseeable development in the region, could result in cumulative impacts to cultural resources in the region. However, policy provisions in the proposed General Plan Update and continued implementation of the city’s Municipal Code would ensure that historic and prehistoric resources are not adversely impacted.</td>
<td>LCC</td>
<td>None required.</td>
</tr>
<tr>
<td>Impact 4.11.5</td>
<td>Implementation of the proposed General Plan Update, in addition to existing, approved, proposed, and reasonably foreseeable development in the region, could result in cumulative impacts to paleontological resources in the region.</td>
<td>LCC</td>
<td>None required.</td>
</tr>
</tbody>
</table>

#### Public Services and Utilities

| Impact 4.12.1.1 | Implementation of the proposed General Plan Update could result in the need for additional fire protection and emergency medical services facilities in order to maintain acceptable service ratios and response times. The provision of these facilities | LS | None required. | LS |

**Legend:**

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<tr>
<td>could cause environmental impacts. However, future fire protection/EMS facilities would be subject to project-level CEQA review at such time as an application for a project was submitted to the appropriate agency. Implementation of the proposed General Plan Update policy provisions and continued implementation of City goals would ensure emergency services and associated facilities are provided.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Impact 4.12.1.2</td>
<td>LS</td>
<td>None required.</td>
<td>LS</td>
</tr>
<tr>
<td>Implementation of the proposed General Plan Update would result in additional need for water supply and infrastructure to provide adequate fire flows for fire protection. The provision of these facilities could cause environmental impacts. However, future improvements would be subject to project-level CEQA review at such time as an application for a project was submitted to the appropriate agency.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Impact 4.12.1.3</td>
<td>LCC</td>
<td>None required.</td>
<td>LCC</td>
</tr>
<tr>
<td>Implementation of the proposed General Plan Update, in combination with other existing, planned, proposed, approved, and reasonably foreseeable development in Butte County, would increase the demand for fire protection and emergency medical services and thus require additional staffing, equipment, and related facilities under cumulative conditions. The provision of these facilities could result in environmental impacts.</td>
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<tr>
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<td>Mitigation Measure</td>
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<tr>
<td><strong>Impact 4.12.2.1</strong></td>
<td>LS</td>
<td>None required.</td>
<td>LS</td>
</tr>
<tr>
<td>Implementation of the proposed General Plan Update would result in increased demand for law enforcement services and could result in the need for new or physically altered law enforcement facilities, the construction of which could cause significant environmental impacts. However, future improvements would be subject to project-level CEQA review at such time as an application for a project was submitted to the appropriate agency.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Impact 4.12.2.2</strong></td>
<td>LCC</td>
<td>None required.</td>
<td>LCC</td>
</tr>
<tr>
<td>Implementation of the proposed General Plan Update, in combination with other existing, planned, proposed, approved, and reasonably foreseeable development in the CPD service area, would increase the demand for law enforcement services and thus require additional staffing, equipment, and facilities, the construction of which could cause significant environmental impacts.</td>
<td></td>
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</tr>
<tr>
<td><strong>Impact 4.12.3.1</strong></td>
<td>LS</td>
<td>None required.</td>
<td>LS</td>
</tr>
<tr>
<td>Implementation of the proposed General Plan Update would increase population in the CUSD service area, which would subsequently increase student enrollment in CUSD schools. New or expanded school facilities may be necessary to serve the increased demand. Subsequent development under the proposed General Plan Update would be subject to school facility fees to pay for additional school</td>
<td></td>
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<tbody>
<tr>
<td>Impact 4.12.3.2</td>
<td>LS</td>
<td>None required.</td>
<td>LS</td>
</tr>
<tr>
<td>Implementation of the proposed General Plan Update would increase population in the city, which could also increase the number of students attending local post-secondary education facilities. The provision of new or expanded facilities would not result in substantial adverse physical impacts.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Impact 4.12.3.3</td>
<td>LCC</td>
<td>None required.</td>
<td>LCC</td>
</tr>
<tr>
<td>Population growth associated with implementation of the proposed General Plan Update, in combination with other existing, planned, proposed, approved, and reasonably foreseeable development in the cumulative setting, would result in a cumulative increase in student enrollment and require additional schools and related facilities to accommodate the growth.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Impact 4.12.4.1</td>
<td>LS</td>
<td>None required.</td>
<td>LS</td>
</tr>
<tr>
<td>Implementation of the proposed General Plan Update would increase demand for water supply and thus require increased groundwater production, which could result in significant effects on the physical environment. However, adequate groundwater supply sources exist, and proposed General Plan Update policy provisions and Cal Water’s water conservation provisions would ensure adequate water service.</td>
<td></td>
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</tbody>
</table>
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#### Impact 4.12.4.2
Implementation of the proposed General Plan Update would increase demand for water supply and thus require additional water supply infrastructure that could result in a physical impact to the environment.

<table>
<thead>
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<tbody>
<tr>
<td>LS</td>
<td>None required.</td>
<td>LS</td>
</tr>
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</table>

#### Impact 4.12.4.3
Implementation of the proposed General Plan Update, in combination with other existing, planned, proposed, approved, and reasonably foreseeable development within the cumulative setting, would increase the cumulative demand for water supplies and related infrastructure.

<table>
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</thead>
<tbody>
<tr>
<td>LCC</td>
<td>None required.</td>
<td>LCC</td>
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</table>

#### Impact 4.12.5.1
Implementation of the proposed General Plan Update could result in wastewater discharge that would exceed wastewater treatment requirements of the Central Valley Regional Water Quality Control Board.

<table>
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<tbody>
<tr>
<td>LS</td>
<td>None required.</td>
<td>LS</td>
</tr>
</tbody>
</table>

#### Impact 4.12.5.2
Subsequent development under the proposed General Plan Update would increase wastewater flows and require additional infrastructure and treatment capacity to accommodate anticipated demands. However, implementation of proposed General Plan Update policy provisions and continued implementation of City standards would ensure adequate wastewater facilities are provided.

<table>
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<tbody>
<tr>
<td>LS</td>
<td>None required.</td>
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#### Impact 4.12.5.3
Implementation of the proposed General Plan Update, along with other

<table>
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<tbody>
<tr>
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<td>None required.</td>
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<tr>
<td>existing, planned, proposed, approved, and reasonably foreseeable development within the cumulative setting, would contribute to the cumulative demand for wastewater service. However, implementation of proposed General Plan Update policy provisions and continued implementation of City standards would ensure adequate wastewater facilities are provided.</td>
<td>LS</td>
<td>None required.</td>
<td>LS</td>
</tr>
<tr>
<td><strong>Impact 4.12.6.1</strong> Implementation of the proposed General Plan Update would generate increased amounts of solid waste that would need to be disposed of in landfills or recycled.</td>
<td>LS</td>
<td>None required.</td>
<td>LS</td>
</tr>
<tr>
<td><strong>Impact 4.12.6.2</strong> Implementation of the proposed General Plan Update would not be expected to result in conflicts with any federal, state, or local solid waste regulations.</td>
<td>LCC</td>
<td>None required.</td>
<td>LCC</td>
</tr>
<tr>
<td><strong>Impact 4.12.6.3</strong> Implementation of the proposed General Plan Update, along with other existing, planned, proposed, approved, and reasonably foreseeable development in the region, would result in increased demand for solid waste services.</td>
<td>LS</td>
<td>None required.</td>
<td>LS</td>
</tr>
<tr>
<td><strong>Impact 4.12.7.1</strong> Implementation of the proposed General Plan Update would result in increased demand for electrical, natural gas, and telecommunications services, including associated infrastructure that</td>
<td></td>
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</tr>
</tbody>
</table>

## 2.0 Executive Summary

<table>
<thead>
<tr>
<th>Impact</th>
<th>Level of Significance Without Mitigation</th>
<th>Mitigation Measure</th>
<th>Resulting Level of Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Impact 4.12.7.2</td>
<td>Implementation of the proposed General Plan Update, along with other existing, planned, proposed, approved, and reasonably foreseeable development, would contribute to the cumulative demand for electrical, natural gas, and telecommunications services and associated infrastructure that could result in a physical impact on the environment.</td>
<td>LCC</td>
<td>None required.</td>
</tr>
<tr>
<td>Impact 4.12.8.1</td>
<td>Implementation of the proposed General Plan Update would accommodate population growth, which could subsequently increase the use of existing parks and recreation facilities and/or require the construction or expansion of park and recreational facilities to meet increased demand.</td>
<td>LS</td>
<td>None required.</td>
</tr>
<tr>
<td>Impact 4.12.8.2</td>
<td>Implementation of the proposed General Plan Update, along with other existing, planned, proposed, approved, and reasonably foreseeable development, would increase the use of existing parks and would require additional park and recreation facilities within the cumulative setting, the provision of which could have an adverse physical effect on the environment.</td>
<td>LCC</td>
<td>None required.</td>
</tr>
</tbody>
</table>

| Impact 4.13.1 | Implementation of the proposed General Plan Update could have a substantial effect on a scenic vista. However, implementation of proposed General Plan Update policy provisions and continued implementation of the city’s Municipal Code would ensure that no adverse impact to a scenic vista would occur. | LS | None required. | LS |
| Impact 4.13.2 | Implementation of the proposed General Plan Update would not damage any scenic resources within a state scenic highway. | NI | None required. | NI |
| Impact 4.13.3 | Implementation of the proposed General Plan Update would result in increased development which would alter the existing visual character of the Planning Area. | S | None available. | SU |
| Impact 4.13.4 | Implementation of the proposed General Plan Update could result in an increase of daytime glare and/or nighttime lighting. This increase in daytime glare sources and nighttime lighting levels could have an adverse effect on adjacent areas and land uses. | LS | None required. | LS |
| Impact 4.13.5 | Implementation of the proposed General Plan Update, in combination with other reasonably foreseeable development projects within Butte County, would contribute to the alteration of the visual character of the | CC | None available. | CC/SU |
### Energy and Climate Change

<table>
<thead>
<tr>
<th>Impact</th>
<th>Impact Description</th>
<th>Level of Significance Without Mitigation</th>
<th>Mitigation Measure</th>
<th>Resulting Level of Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Impact 4.14.1</strong></td>
<td>Development under the proposed General Plan Update would increase the consumption of energy associated with electrical, natural gas, and vehicle fuel. However, implementation of proposed General Plan Update policies and state programs and requirements would ensure that energy usage is not inefficient, wasteful, or unnecessary.</td>
<td>LS</td>
<td>None required.</td>
<td>LS</td>
</tr>
<tr>
<td><strong>Impact 4.14.2</strong></td>
<td>Implementation of the proposed General Plan Update would be consistent with the goals of AB 32 (Health and Safety Code Sections 38500, 38501, 28510, 38530, etc.). However, it could still result in greenhouse gas emissions that may further contribute to significant impacts on the environment.</td>
<td>CC</td>
<td>None available.</td>
<td>CC/SU</td>
</tr>
</tbody>
</table>
3.0 **RESPONSES TO COMMENTS**
3.0 RESPONSES TO COMMENTS

3.1 COMMENTS AND RESPONSES

REQUIREMENTS FOR RESPONDING TO COMMENTS ON A DEIR

CEQA Guidelines Section 15088 requires that lead agencies evaluate all comments on environmental issues received on a DEIR and prepare a written response. The written response must address each significant environmental issue raised and must be detailed, especially when specific comments or suggestions (e.g., additional mitigation measures) are not accepted. In addition, there must be a good faith and reasoned analysis in the written response. However, lead agencies need only respond to significant environmental issues associated with the project and do not need to provide all the information requested by commenters, as long as a good faith effort at full disclosure is made in the EIR (CEQA Guidelines 15204).

CEQA Guidelines Section 15204 recommends that commenters provide detailed comments that focus on the sufficiency of the DEIR in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. CEQA Guidelines Section 15204 also notes that commenters should provide an explanation and evidence supporting their comments. Pursuant to CEQA Guidelines Section 15064, an effect shall not be considered significant in the absence of substantial evidence supporting such a conclusion.

CEQA Guidelines Section 15088 also recommends that where a response to comments results in revisions to the DEIR, those revisions should be incorporated as a revision to the DEIR or as a separate section of the FEIR. Revisions to the Chico General Plan Update DEIR are listed in Section 4.0, Minor Revisions to the Draft EIR, of this Final EIR.

RESPONSES TO COMMENT LETTERS

Written comments on the DEIR are reproduced on the following pages, along with responses to those comments. To assist in referencing comments and responses, the following coding system is used:

Public agency comment letters are coded by letters and each issue raised in the comment letter is assigned a number (e.g., Comment Letter A, comment 1 is referred to as A-1).

Individual and interest group comment letters are coded by numbers and each issue raised in the comment letter is assigned a number (e.g., Comment Letter 1, comment 1 is referred to as 1-1).

In addition to written responses to the DEIR provided in the form of letters or e-mails, verbal comments on the DEIR were submitted at the public comment meeting held on November 9, 2010. These verbal comments have been transcribed and are coded in the same manner as described above, except when a commenter submitted both a written and verbal comment. In those cases, both comments are assigned the same letter or number, followed by a lowercase letter (e.g., Comment 1a, Comment 1b).

Where separate comments are substantially similar to each other or address the same issue, the reader may be referred to a previous response.

Where changes to the DEIR text result from responding to comments, the commenter is referred to Section 4.0, Minor Revisions to the Draft EIR.
### 3.2 List of Commenters

The following individuals and representatives of organizations and agencies submitted written and/or verbal comments on the DEIR.

<table>
<thead>
<tr>
<th>Letter/Verbal Comment</th>
<th>Individual or Signatory</th>
<th>Affiliation</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Mike Bartlett</td>
<td>California Department of Transportation (Caltrans)</td>
<td>November 22, 2010</td>
</tr>
<tr>
<td>B</td>
<td>Moses Stites</td>
<td>California Public Utilities Commission</td>
<td>November 29, 2010</td>
</tr>
<tr>
<td>C</td>
<td>Amy Huberland</td>
<td>Northeast Information Center, California State University, Chico</td>
<td>November 29, 2010</td>
</tr>
<tr>
<td>D</td>
<td>Gail Williams</td>
<td>Butte County Air Quality Management District</td>
<td>November 30, 2010</td>
</tr>
<tr>
<td>E</td>
<td>Steve Betts</td>
<td>Butte Local Agency Formation Commission</td>
<td>November 30, 2010</td>
</tr>
<tr>
<td>F</td>
<td>Vance Severin</td>
<td>Butte County Public Health Department</td>
<td>December 1, 2010</td>
</tr>
<tr>
<td>1a</td>
<td>Grace Marvin</td>
<td>Sierra Club, Yahi Group</td>
<td>November 29, 2010</td>
</tr>
<tr>
<td>1b*</td>
<td>Grace Marvin</td>
<td>Sierra Club, Yahi Group</td>
<td>November 9, 2010</td>
</tr>
<tr>
<td>2a</td>
<td>Luke Anderson</td>
<td>Chico Healthy Air Alliance</td>
<td>December 1, 2010</td>
</tr>
<tr>
<td>2b*</td>
<td>Luke Anderson</td>
<td>Chico Healthy Air Alliance</td>
<td>November 9, 2010</td>
</tr>
<tr>
<td>3a</td>
<td>Mark Stemen</td>
<td>California State University, Chico</td>
<td>December 1, 2010</td>
</tr>
<tr>
<td>3b*</td>
<td>Mark Stemen</td>
<td>California State University, Chico</td>
<td>November 9, 2010</td>
</tr>
<tr>
<td>4*</td>
<td>Robin Huffman</td>
<td>Butte Environmental Council</td>
<td>November 9, 2010</td>
</tr>
</tbody>
</table>

*Verbal comments received at the November 9, 2010 public comment meeting on the Draft EIR.
November 22, 2010

032010BUT0029
City of Chico General Plan Update
Draft Environmental Impact Report
SCII#2008122038

Mr. Brendan Vieg
City of Chico
411 Main Street
P.O. Box 3420
Chico, CA 95927

Dear Mr. Vieg,

Thank you for the opportunity to review and comment on the City of Chico’s General Plan 2030 Draft Environmental Impact Report (DEIR). Caltrans has the following comments:

Traffic and Circulation

- Pg. 4.5-1 State Highways – the freeway classification should be corrected to state freeways serve regional and interregional travel and should not become the optimum route for inter-city trips. A-1

- Figure 4.5-2 Existing Traffic Volumes Inset “A” – Traffic volumes on the couplet are high, it appears the volumes for both directions are added together and posted twice (both eastbound and westbound). This should be revised accordingly. A-2

- Pg. 4.5-31 Regulatory Framework – Corridor System Management Plans (CSMPs) are prepared for highly congested State Highway facilities; the State Route (SR) 99 CSMP should be referenced in addition to the TCR, as the TCR does not describe the entire study area. A-3

- Pg. 4.5-47 Table 4.5-9 Freeway Level of Service – Proposed General Plan Update Year 2030 Conditions – The listed PM Peak Volume for Freeway segment SR 99 South of Skyway is too low, it is approximately 4,600 vph, this should be corrected. A-4

“Caltrans improves mobility across California”
3.0 RESPONSES TO COMMENTS

Letter A Continued

Mr. Brendan Vieg
November 22, 2010
Page 2 of 2

- Pg. 4.5-53 State Highway Facilities (Standards of Significance 1) – This portion of the DEIR discusses the segment of SR 99 between East 1st Avenue and SR 32 operating at LOS F in Year 2030. It states that “Widening SR 99 to three lanes without or with auxiliary lanes (northbound and southbound) …would result in acceptable LOS E or better operations.” This section references the auxiliary lanes as a Butte County Association of Governments project anticipated to proceed in the upcoming several years. However, the document further states that, “…given state funding shortfalls, and the fact that the City is not in control of the timing or implementation of this improvement, there is uncertainty regarding the ultimate timing of the improvement.”

- The DEIR should reflect the current status of the auxiliary lane improvements for this segment and the related level of service. Phase 1 is complete and Phase 2 is programmed with an estimated completion date of November 2013.

- As part of the circulation network, the operation and improvements of the State Highway System are a shared responsibility between the City of Chico and Caltrans. This should be reflected in a policy statement.

If you have questions or need additional information, please contact Rupinder Jawanda at (530) 740-4989 or e-mail at rupinder_jawanda@dot.ca.gov.

Sincerely,

MIKE BARTLETT
Chief, Office of Transportation Planning – North

“Caltrans improves mobility across California”
3.0 RESPONSES TO COMMENTS

COMMENT A – MIKE BARTLETT, CALIFORNIA DEPARTMENT OF TRANSPORTATION (CALTRANS)

Response A-1:  The commenter states that the DEIR should be corrected to indicate that state highways should not become the optimum route for intercity trips. It is anticipated that the commenter wants to clarify that state highways should not be used for “intra” city trips, because clearly state highways are intended for “inter” city trips (e.g., trips between different cities). The DEIR has been revised to address the comment. See Section 4.0, Minor Revisions to the Draft EIR, of this FEIR on pg. 4.0-5.

Response A-2:  The commenter states that Inset A of Figure 4.5-2 appears to show incorrect traffic volumes for the couplet. The DEIR has been revised to address the comment. See Section 4.0, Minor Revisions to the Draft EIR, of this FEIR on pg. 4.0-19.

Response A-3:  The commenter states that page 4.5-31 of the DEIR should reference the State Route 99 Corridor System Management Plan (CSMP) in addition to the Transportation Concept Report (TCR) as the TCR does not describe the entire study area. The DEIR has been revised to address the comment. See Section 4.0, Minor Revisions to the Draft EIR, of this FEIR on pg. 4.0-5.

Response A-4:  The commenter states that the pm peak volume for freeway segment SR 99 – South of Skyway as shown in Table 4.5-9 of the DEIR is too low. The commenter states that it should be corrected to 4,600 vph. The peak hour volume shown for the referenced segment of SR 99 – South of Skyway is correct relative to the tools used and input assumptions. The following list outlines several items that would contribute to lower traffic volumes on this segment of SR 99 relative to the volume anticipated by the commenter:

• Different Traffic Model - The DEIR used the City of Chico Travel Demand Forecasting Model to develop the traffic volume forecasts for the proposed General Plan Update.

• Land Use Inputs – The traffic volume forecasts for Section 4.5 of the DEIR were developed using the proposed General Plan Update that differs from current land use assumptions for the Chico area.

• Roadway Network Inputs – The traffic volume forecasts for Chapter 4.5 of the DEIR assumed the new SR 99/Southgate Avenue interchange and roadway connection between SR 99 and Midway and between SR 99 and Skyway were completed. Due to these new connections, the traffic volume forecasts south of Southgate would likely be lower than the referenced segment.
In general, it is difficult to compare the proposed General Plan Update forecasts to the forecast referenced by the commenter, as the commenter did not explain how the forecast referenced was derived.

Response A-5: The commenter states that page 4.5-53 of the DEIR should be revised to reflect the current status of the auxiliary lane improvements for SR 99 between East 1st Avenue and SR 32 and the associated level of service. The commenter notes that Phase 1 of the improvements is complete and Phase 2 is scheduled to be complete in November 2013.

The DEIR has been revised to address the comment. See Section 4.0, Minor Revisions to the Draft EIR, of this FEIR on pg. 4.0-5.

Response A-6: The commenter states that a policy statement should reflect that the operation and improvements of the State Highway System are a shared responsibility between the City of Chico and Caltrans.

The proposed General Plan Update includes policies requiring collaboration with Caltrans and addressing the City’s responsibility to pay fair share costs of mitigating local developments’ impact to state facilities. For example, Policy CIRC-1.8 and associated actions require the City to continue to consult with the Butte County Association of Governments (BCAG) and Caltrans regarding the prioritization and timely construction of programmed freeway and interchange improvements on the state highway system. Policy CIRC-1.3 requires the City to collect the fair share cost of circulation improvements necessary to address cumulative transportation impacts, including those to state highways. These policies and actions clearly acknowledge that the City has a shared responsibility in regard to the operation and improvements of the State Highway System and emphasize the City’s commitment to working collaboratively with federal, state, and regional agencies and jurisdictions to provide an efficient circulation system for all modes of transportation.
Letter B

November 29, 2010

Brendan Vieg
City of Chico
411 Main Street, 2nd Floor
Chico, CA 95927

Re: Notice of Preparation, Draft Environmental Impact Report (DEIR)
City of Chico 2030 General Plan Update
SCH# 2003122038

Dear Mr. Vieg:

As the state agency responsible for rail safety within California, the California Public Utilities Commission (CPUC or Commission) recommends that development projects proposed near rail corridors be planned with the safety of these corridors in mind. New developments and improvements to existing facilities may increase vehicular traffic volumes, not only on streets and at intersections, but also at at-grade highway-rail crossings. In addition, projects may increase pedestrian traffic at crossings, and elsewhere along rail corridor rights-of-way. Working with CPUC staff early in project planning will help project proponents, agency staff, and other reviewers to identify potential project impacts and appropriate mitigation measures, and thereby improve the safety of motorists, pedestrians, railroad personnel, and railroad passengers.

The traffic impact study within the Transportation/Traffic section of the DEIR needs to specifically consider safety issues at at-grade railroad crossings and rail corridor. In addition to the potential impacts of the proposed project itself, the DEIR needs to consider cumulative rail safety-related impacts created by other projects.

In general, the major types of impacts to consider are collisions between trains and vehicles, and between trains and pedestrians. The proposed project has the potential to increase vehicular and pedestrian traffic in the vicinity.

Measures to reduce adverse impacts to rail safety need to be considered in the DEIR. General categories of such measures include:

- Installation of grade separations at crossings, i.e., physically separating roads and railroad tracks by constructing overpasses or underpasses
- Improvements to warning devices at existing highway-rail crossings
- Installation of additional warning signage
- Improvements to traffic signalling at intersections adjacent to crossings, e.g., traffic preemption

B-1

B-2

B-3

B-4
Letter B Continued

Brendan Vieg
SCH # 2008122038
November 29, 2010
Page 2 of 2

- Installation of median separation to prevent vehicles from driving around railroad crossing gates
- Prohibition of parking within 100 feet of crossings to improve the visibility of warning devices and approaching trains
- Installation of pedestrian-specific warning devices and channelization and sidewalks
- Construction of pull out lanes for buses and vehicles transporting hazardous materials
- Installation of vandal-resistant fencing or walls to limit the access of pedestrians onto the railroad right-of-way
- Elimination of driveways near crossings
- Increased enforcement of traffic laws at crossings
- Rail safety awareness programs to educate the public about the hazards of highway-rail grade crossings

Commission approval is required to modify an existing highway-rail crossing or to construct a new crossing.

Please forward the traffic impact study scope of services for our review before the study is initiated to ensure that the rail corridor and all at-grade railroad crossings are included within the project area.

Thank you for your consideration of these comments. We look forward to working with the City on this project. If you have any questions in this matter, please contact me at (415) 713-0092 or email at ms2@gepec.ca.gov.

Sincerely,

Moses Stites
Rail Corridor Safety Specialist
Consumer Protection and Safety Division
Rail Transit and Crossings Branch
180 Promenade Circle, Suite 115
Sacramento, CA 95834-2939
COMMENT B – MOSES STITES, CALIFORNIA PUBLIC UTILITIES COMMISSION

Response B-1: The commenter notes that the California Public Utilities Commission (CPUC) is the state agency responsible for rail safety in California and then summarizes general concerns regarding projects proposed in the vicinity of rail corridors, including increased vehicular and pedestrian traffic at at-grade rail crossings. The commenter also recommends early consultation with the CPUC to identify potential impacts and mitigation measures.

Rail safety is addressed by Impacts 4.4.3, 4.4.6, and 4.5.5 of the DEIR. These impacts acknowledge that implementation of the proposed General Plan Update would increase the amount of vehicle and pedestrian traffic in the city and could thus result in rail-safety-related impacts. As discussed in the DEIR, the proposed General Plan Update incorporates policies directing that rail safety concerns, including at-grade crossings, illegal pedestrian crossing of the tracks, and emergency vehicle access, be investigated and addressed. Specifically, Actions CIRC-7.1.2 and CIRC-7.1.3 address improving the condition and safety of railroad crossings by upgrading surface conditions and providing adequate signs and signals as well as exploring the feasibility of constructing new grade-separated crossings. Policy S-7 and associated actions require the City to enhance the safety of railroad crossings in Chico. As such, the DEIR finds that, at a programmatic level, impacts associated with rail safety would be less than significant.

Furthermore, no specific development projects are proposed as part of the General Plan Update. However, future discretionary approvals that could result in development projects in the vicinity of rail corridors will be subject to consultation with the CPUC and individual review of potential rail safety impacts.

Response B-2: The commenter states that the traffic impact study in the DEIR needs to specifically consider rail safety issues, including cumulative impacts created by other projects.

The commenter is referred to Response B-1. In addition, the traffic analysis did include a cumulative traffic analysis which can be found on pages 4.5-57 through 4.5-58 of the Draft EIR.

Response B-3: The commenter states that the project has the potential to increase vehicular and pedestrian traffic and that the major impacts to consider are collisions between trains and vehicles and trains and pedestrians.

The commenter is referred to Response B-1.

Response B-4: The commenter states that measures to reduce adverse impacts to rail safety need to be addressed in the DEIR and lists general categories of such measures.

As discussed in Response B-1, the DEIR addresses programmatic impacts associated with rail safety. The proposed General Plan Update incorporates policies directing that rail safety concerns be investigated...
and addressed, including measures listed by the commenter. For example, Actions CIRC-7.1.2 and CIRC-7.1.3 address the provision of adequate signs and signals as well as exploring the feasibility of constructing new grade-separated crossings, and Action S-7.1.2 addresses rail safety awareness and education programs. In addition, the proposed General Plan Update does not preclude, but rather supports, the consideration and implementation of rail safety measures such as those listed by the commenter. Therefore, it is anticipated that all feasible rail safety measures would be considered during future City investigations as directed by the General Plan Update, or at such time as specific development projects were proposed in the vicinity of rail corridors.

Response B-5: The commenter notes that CPUC approval is required to modify an existing highway-rail crossing or to construct a new crossing.

The proposed General Plan Update does not specifically propose to modify or construct a railroad crossing. The commenter is referred to Response B-1.

Response B-6: The commenter requests that the traffic impact study scope of services be forwarded to the CPUC before the study is initiated to ensure all rail corridors and at-grade crossings are included in the project area.

The traffic study referenced by the commenter is already complete, and was provided as part of the Draft EIR. The project area, as well as the railroad alignment through the project area, is shown in Figure 4.5-4, Existing Goods Movement and Aviation Facilities, of the DEIR.
Letter C

Hello Bob,

I reviewed the Cultural Resources section of the City of Chico 2030 General Plan Update Draft EIR. Overall, it looked very thorough. I did notice, however, that there is no reference to Native American Consultation. Since the City has already conducted extensive NA consultation for the General Plan and I assume plans to continue to consult with the tribe regarding Traditional Cultural Properties, I would suggest a few sentences in the EIR referring to this consultation. For example, under Policy CRIP 1.1 (Page 4.11-16) many specific actions are listed. The following action items should be added:

1. Consultation with Native American Tribes regarding archaeological and traditional cultural properties.
2. Coordination with the Northeast Information Center regarding cultural resources project review for discretionary projects.

Also, the first paragraph on page 4.11-10 states that the "...Thomas-Wright Old Patrick Ranch House...is proposed to be relocated within the city..." is incorrect? I believe if it is moved it will be moved down to Patrick Ranch, also outside the city limits.

And lastly, the typo on page 4.11-9 states that there are "3 State landmarks within Chico" but then lists and describes 4.

Please let me know if you need any additional information or clarification regarding my comments, and thank you for bringing this to my attention.

Sincerely,

Amy Haberland, M.A.
Assistant Coordinator
Northeast Information Center
California State University, Chico
Building 25, Room 204
Chico, California 95929-0377
(530) 898-5438
ahberland@csuchico.edu

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3.0 RESPONSES TO COMMENTS

COMMENT C – AMY HUBERLAND, NORTHEAST INFORMATION CENTER, CALIFORNIA STATE UNIVERSITY, CHICO

Response C-1: The commenter suggests that the EIR include a few sentences regarding Native American consultation. The commenter also suggests two actions regarding consultation with the Northeast Information Center and Native American tribes be added to proposed General Plan Update Policy CRHP-1.1.

The DEIR discusses Native American coordination on page 4.11-10. In addition, the proposed General Plan Update includes Actions CRHP-1.1.7 and CRHP-1.1.8 that require consultation with the Northeast Information Center and Native American Heritage Commission, respectively. These policies will be added to the list of policies pertaining to cultural and paleontological resources found on pages 4.11-16 through -17 of the DEIR. See Section 4.0, Minor Revisions to the Draft EIR, of this FEIR on pg. 4.0-7.

Response C-2: The commenter asks if the DEIR is correct in stating that the Thomas-Wright Old Patrick Ranch House will be relocated inside the city.

According to the President of the Chico Heritage Association, a more accurate name for the House would be the Wright-Patrick House because Thomas Wright was a major player in the area in the 1850’s and the most likely scenario is that it will be moved to the Patrick Ranch. The house is included in the Patrick Ranch Master Plan as the “T.S. Wright Roadhouse.” The DEIR has been revised to address the comment. See Section 4.0, Minor Revisions to the Draft EIR, of this FEIR on pg. 4.0-7.

Response C-3: The commenter points out a typo on page 4.11-9 of the DEIR.

The DEIR has been revised to address the comment. See Section 4.0, Minor Revisions to the Draft EIR, of this FEIR on pg. 4.0-7.
November 30, 2010

Brendan Vieg
City of Chico
P.O. Box 3420
Chico, CA 95927-3420

Re: Draft Environmental Impact Report (DEIR) for the City of Chico General Plan Update 2030
(Plan 2030)

Dear Mr. Vieg:

Thank you for providing the Butte County Air Quality Management District (District) the opportunity to review the DEIR for the City of Chico Plan 2030. Our comments address the Air Quality and Energy and Climate Change Sections in the DEIR.

Based on the information reviewed, the District considers the DEIR analysis to be comprehensive and consistent with the District’s air quality goals. Although the Plan 2030 will by its nature result in significant and unavoidable impacts to city environmental resources, the District supports the smart growth principles within the Plan which promote more livable communities and reduce the emission impacts of future development.

Pending a mandatory air quality impact fee, all projects are able to voluntarily reduce air quality impacts to less than significant. The District recommends that all projects utilize the District’s CEQA Air Quality Handbook (Handbook) to reduce air quality impacts to a “less than significance level”. The Handbook provides voluntary on-site and off-site mitigations by which a project proponent may offer to contribute mitigation funds or sponsor an air pollution emission reduction project approved by the District.

Please note a few modifications to the DEIR as follows:

1. Table 4.6-2 contains fine particulate matter (PM2.5) data which includes the 2008 wildfire impacts. Please note this data has been flagged and submitted to U.S. EPA for exclusion as an exceptional event.
2. Table 4.6-3 Federal and State Ambient Air Quality Attainment Status for Sacramento Valley Air Basin should state for Butte County only.

The District appreciates the opportunity to comment on the proposed project. If you have any questions, please contact the District at 891-2882 extension 103.

Sincerely,

Gail Williams
Senior Air Quality Planner

File No 3457
Comment D – Gail Williams, Butte County Air Quality Management District

Response D-1: The commenter thanks the City for the opportunity to review the DEIR and notes that all her comments pertain to the Air Quality and Energy and Climate Change sections of the DEIR.

This comment is noted and responses are provided below.

Response D-2: The commenter states that the DEIR analysis is comprehensive and consistent with the District’s goals. The commenter expresses support for the smart growth principles in the proposed General Plan Update.

This commenter’s support for the analysis in the DEIR and the smart growth principles of the proposed General Plan Update are acknowledged.

Response D-3: The commenter states that, pending a mandatory air quality impact fee, projects are voluntarily able to reduce air quality impacts to less than significant by including on- and off-site mitigation provided by the District’s CEQA Air Quality Handbook.

The DEIR provides a programmatic review of environmental impacts resulting from implementation of the proposed General Plan Update. Subsequent development proposed under the General Plan Update would require site-specific environmental review that would address potential air quality impacts and feasible mitigation. Under Impacts 4.6.2 and 4.6.3, the DEIR points out that the District’s CEQA Air Quality Handbook identifies a list of best available mitigation strategies tailored to the type of project being proposed. In addition, Action OS-4.1.1 was revised during Council’s review of the draft General Plan, and it now directs that either the BCAQMD or the City of Chico (emphasis added) will develop an air quality impact fee as one method to further mitigate air quality impacts. In other words, the City is committing itself to developing an air quality impact fee even if the BCAQMD does not.

It is important to note that while future individual development projects (in conjunction with a mandatory air quality impact fee) would be able to reduce air quality impacts to a less than significant level in almost all foreseeable cases, air quality pollutants would still be emitted from these individual development projects. For instance, although future, individual development projects may not generate significant short-term emissions due to the District’s list of best available mitigation strategies located in the District’s CEQA Air Quality Handbook, it is highly likely that several of future development projects would be under construction simultaneously in the city and would therefore generate a collective of construction emissions that could impact air quality.

Similarly, in terms of long-term operational air quality impacts, the DEIR determined that District-recommended mitigations would substantially reduce potential long-term operational air quality pollutants by regulating individual projects. However, impacts would still be significant and unavoidable because the greater region encompassing Chico is designated nonattainment for several federal and state standards and
feasible mitigations would not fully offset air pollutant emissions consequential to build-out of the proposed General Plan Update in this nonattainment region.

**Response D-4:** The commenter states that fine particulate matter (PM$_{2.5}$) data contained in Table 4.6-2 of the DEIR includes the 2008 wildfire impacts. The commenter requests that it be noted that this data has been flagged and submitted to the USEPA for exclusion as an exceptional event.

The DEIR has been revised to address the comment. See Section 4.0, Minor Revisions to the Draft EIR, of this FEIR on pg. 4.0-9.

**Response D-5:** The commenter states that the air quality attainment status shown in Table 4.6-3 of the DEIR should state for Butte County only.

The DEIR has been revised to address the comment. See Section 4.0, Minor Revisions to the Draft EIR, of this FEIR on pg. 4.0-6.
November 30, 2010

City of Chico, Planning Services Department
Attention: Brendan Vieg, Principal Planner
P.O. Box 3420
Chico, CA 95927-3420

RE: Review of the Draft EIR for the City of Chico 2030 General Plan Update

Dear Mr. Vieg:

Thank you for presenting the Butte Local Agency Formation Commission (LAFCo) with the opportunity to comment on the Draft Environmental Impact Report for the City of Chico's 2030 Draft General Plan Update. LAFCo intends to use, where applicable, the Final EIR and the City's 2030 General Plan in fulfilling its regulatory and planning responsibilities under the authority of the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000. These duties include, but are not limited to, approving annexations, sphere of influence updates, and special district formations, consolidations, or dissolutions.

LAFCo’s primary consideration pertains to the Land Use, Agricultural Resources, and Public Services and Utilities sections of the Draft EIR. With this in mind, LAFCo offers the following comments.

Section 1.4
This section should very clearly state the City's and Butte LAFCo's intention to utilize the EIR for the City's future sphere of influence update. At the time of review of the City's SOI update, LAFCo will make the determination that the EIR certified by the City is adequate for that purpose. If LAFCo cannot make that determination, the EIR would either need to be supplemented or a new EIR prepared.

Figure 3.0-2
The boundary of the City's Sphere of Influence as shown on this figure is what is proposed by the City and does not show the existing SOI boundaries as approved by LAFCo. This figure, and any other figures in the Draft EIR that show SOI boundaries, should be revised to show the existing SOI boundary and the proposed SOI boundary.

Page 3.0-28 - “Relationship to LAFCo Policy”
The last sentence of the first paragraph should also note that Butte LAFCo reviews and evaluates sphere of influence updates and amendments for cities and special districts.
Letter E Continued

Brendan Vieg
November 30, 2010
Page 2 of 5

3.0 RESPONSES TO COMMENTS

The last paragraph of this section states “This EIR is designed to programmatically and comprehensively analyze impacts associated with implementation of the proposed General Plan Update, including expansion of the City’s SOI and future annexations consistent with the Land Use Diagram.” It is LAFCo’s intent to utilize the EIR for the City’s future sphere of influence update if LAFCo makes the determination that the EIR certified by the City is adequate for that purpose. However, the EIR may not be adequate for the required CEQA review for future annexations to the City because the EIR lacks the project-level analysis required for annexation proposals. The City should not expect to solely rely on the 2030 General Plan Final Environmental Impact Report to support or mitigate all project specific impacts identified during the annexation process.

Section 4.0 Assumptions
When is the buildout of the existing Chico SOI expected to occur?

Page 4.0-5 – “Local Adopted General Plans”
This section should be modified to reflect the recent adoption of the County’s new General Plan.

Tables 4.0-2 and 4.0-3
Why do these tables exclude growth assumptions for Chico? The DEIR does not appear to contain a table that shows five-year population and housing growth projections to 2030 for the City of Chico.

Page 4.1-3 – “Butte County General Plan/Proposed Butte County General Plan 2030”
This section should be revised to reflect the recent adoption of the County’s new GP.

Figure 4.1-1
This figure should be revised to reflect the new land use designations created in the County’s recently-adopted General Plan.

Page 4.1-7 – “Chapman-Mulberry Neighborhood Plan”
It should be noted in this section that the Chapman-Mulberry neighborhood is also lacking adequate wastewater disposal infrastructure. The primary method of wastewater disposal in the area is by individual, on-site septic systems, which has the potential for polluting groundwater and surface runoff. The City of Chico is currently extending sewer lines into the area, which will allow for connection to the City’s sanitary sewer system and the abandonment of the existing septic systems.

Page 4.1-9 – “Butte Local Agency Formation Commission (Butte LAFCo)”
To provide additional information to the reader, this section could be modified to state the composition of Butte LAFCo, which is composed of two members from the Butte County Board of Supervisors; two members from the city councils; two members who represent special districts; and one public member.

Page 4.2-1 – “Existing Land Use and Agricultural Operations”
How large is the Vanella Orchard agricultural operation? Additionally, figures from the 2009 Butte County Agricultural Commissioner’s crop report should be used to ensure an up-to-date EIR.
Letter E Continued

Brendan Vieg
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3.0 RESPONSES TO COMMENTS

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**Page 4.2-1 – “Existing Butte County Agricultural Operations”**
This section should be revised to include figures from the 2009 Butte County Agricultural Crop Report to ensure an up-to-date EIR.

**Page 4.2-2 – “Farmland Classifications and Rating System”**
This section describes various farmland classifications but does not describe "prime agricultural land" as defined by Section 56064 of the California Government Code, which LAFCo will utilize when reviewing sphere of influence updates/amendments and annexation proposals. Environmental documents associated with projects that require LAFCO approval that identify potential impacts to agricultural resources should disclose the degree of impact according to the definition of prime agricultural land as defined by Government Code Section 56064. Section 56064 defines “Prime Agricultural Land” as follows:

56064. "Prime agricultural land" means an area of land, whether a single parcel or contiguous parcels, that has not been developed for a use other than an agricultural use and that meets any of the following qualifications:

(a) Land that qualifies, if irrigated, for rating as class I or class II in the USDA Natural Resources Conservation Service land use capability classification, whether or not land is actually irrigated, provided that irrigation is feasible.

(b) Land that qualifies for rating 80 through 100 Storie Index Rating.

(c) Land that supports livestock used for the production of food and fiber and that has an annual carrying capacity equivalent to at least one animal unit per acre as defined by the United States Department of Agriculture in the National Range and Pasture Handbook, Revision 1, December 2003.

(d) Land planted with fruit or nut-bearing trees, vines, bushes, or crops that have a nonbearing period of less than five years and that will return during the commercial bearing period on an annual basis from the production of unprocessed agricultural plant production not less than four hundred dollars ($400) per acre.

(e) Land that has returned from the production of unprocessed agricultural plant products an annual gross value of not less than four hundred dollars ($400) per acre for three of the previous five calendar years.

**Page 4.2-10 – “Williamson Act Contract Lands”**
This section should be revised to state that there are no parcels subject to Williamson Act contracts in the existing SOI or the proposed SOI.

**Figure 4.2-2**
The “Prime Agricultural Land” legend in the legend box appears to be mislabeled and should be labeled as “Williamson Act Contracts.” Additionally, the “Non-Prime Agricultural Land” legend shows Williamson Act contracts, not non-prime agricultural lands. The area in yellow on the figure should be green in color.
3.0 RESPONSES TO COMMENTS

Letter E Continued

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3.0-19

Page 4.2-15. - “Local”
The various LAFCo policies regarding conversion and protection of agricultural lands should be noted here. The applicable LAFCo policies include:

2.13 Agricultural and Open Space Land Conservation.
2.13.1 Conditions for Approval of Prime Agricultural/Open Space Land Conversion.
2.13.2 Approved Sphere of Influence Plan Required
2.13.3 Finding with Respect to Alternative Sites
2.13.4 Determining Impact on Adjacent Agricultural/Open Space Lands
2.13.5 Comment on Prime Agricultural/Open Space Projects and Chico Urban Area “Green Line” Policy

Section 4.23 – “Impacts and Mitigation Measures”
The City is to be commended for including numerous policies in the draft General Plan regarding protection of agricultural resources, including preserving the Chico Green Line. However, the policies in the General Plan would not reduce impacts to agricultural resources to a less than significant level, and, as noted in the Draft EIR, implementation of the General Plan would result in significant impacts to agricultural resources for which there is no feasible mitigation available and the impacts would be unavoidable.

The City of Gridley’s recently-adopted (December 2009) General Plan contains numerous policies regarding impacts to agricultural resources. One of the policies in Gridley’s General Plan requires all new development to mitigate for conversion of agricultural land to urban uses, which could include the payment of in-lieu fees to acquire agricultural conservation easements. Gridley’s General Plan Conservation Policy 1.3 states:

New development within the Planned Growth Area shall mitigate for the conversion of agricultural land to urban use. Mitigation shall include in-lieu fees to acquire agricultural conservation easements or direct placement of agricultural conservation easements on a similar quality and amount of land.

The City of Chico should consider including a similar policy in the proposed General Plan to provide for mitigation of the conversion of agricultural lands to urban uses.

Page 4.3-1 (Section 4.3.1 - Existing Setting)
The City should consider including 2009 and 2010 Department of Finance population data in the EIR to ensure that the document is as accurate and up-to-date as possible.

Page 4.12 16 “Funding”
What are the current police protection building and equipment fees for new development?

Page 4.12-36
First paragraph, last sentence – “immediate” should be “immediately”.
Section 4.12.5 – Wastewater Service
More information on wet weather flows should be provided in this section. A table listing the average flows for each month of the year would show the difference between dry weather and wet weather flows, which would also indicate how much inflow and infiltration is occurring in the City’s sewer system.

Page 4.12-62 (City Fees)
What are the current monthly sewer service charges and the various connection fees for new development?

Page 4.12-65 (Sanitary Sewer Overflow Program)
How many reportable sanitary sewer overflows have occurred in the City’s sewer system since mandatory SSO reporting began?

Page 4.12-66 (Waste Discharge Requirements)
When will the City be required to obtain new waste discharge requirements from RWQCB? Are major upgrades to the City’s WPCP being anticipated as a part of possible future waste discharge requirements? How will any required upgrades be funded?

Section 7.3 – Significant and Unavoidable Environmental Effects
This section identifies impacts that are significant and unavoidable for which no feasible mitigation is possible. The EIR clearly indicates that the City understands and accepts that many identified impacts are significant and unavoidable and therefore are not addressed by any mitigation measures contained within the documents. While the City has the option to assume this approach for evaluating and mitigating impacts, LAFCo has the responsibility to address issues relevant to the provision of services, impacts to other agencies and logical growth management practices based on the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 and its own adopted policies. It should be recognized that LAFCo may arrive at alternative views of these issues and make determinations contrary to City perspectives unless the City provides a more thorough analysis at such time individual projects are proposed for LAFCO consideration.

Thank you again for providing us the opportunity to review the Draft EIR for the City’s 2030 General Plan.

Sincerely,

Steve Betts
Deputy Executive Officer
COMMENT E – STEVE BETTS, BUTTE LOCAL AGENCY FORMATION COMMISSION

Response E-1: The commenter thanks the City for the opportunity to comment on the DEIR and notes that LAFCo intends to use the FEIR and the General Plan in fulfilling its regulatory and planning responsibilities. The commenter also notes that his comments pertain to the Land Use, Agricultural Resources, and Public Service and Utilities sections of the DEIR.

This comment is noted and responses to LAFCo’s comments are provided below.

Response E-2: The commenter states that subsection 1.4 of the DEIR should clearly state the intention of the City and Butte County LAFCo to use the General Plan Update EIR for the City’s Sphere of Influence (SOI) update. The commenter notes that when reviewing the City’s SOI update, LAFCo will make the determination that the EIR certified by the City is adequate for the SOI update. If LAFCo cannot make that determination, the commenter notes that a supplemental or new EIR would need to be prepared.

Section 3.0, Project Description, of the DEIR includes a thorough narrative regarding the role of LAFCo and the General Plan Update and DEIR in updating the City’s SOI. Specifically, subsection 3.4 of the DEIR states “Implementation of the proposed General Plan Update, specifically approval of development outside of the City’s current SOI, would require LAFCo approval of an SOI expansion and annexation of those areas into the city.” In addition, page 3.0-28 of the DEIR includes a discussion of the DEIR’s relationship to LAFCo policy. The discussion explains that while the proposed General Plan Update itself is not a Sphere of Influence amendment request or application, the EIR is designed to programmatically and comprehensively analyze impacts associated with implementation of the proposed General Plan Update, including expansion of the City’s SOI and future annexations consistent with the Land Use Diagram.

Response E-3: The commenter states that Figure 3.0-2 and other figures showing the SOI need to show both the existing and proposed SOI boundaries.

Figure 3.0-2 has been revised to reflect both the existing and proposed SOIs. See Section 4.0, Minor Revisions to the Draft EIR, of this FEIR on pg. 4.0-13.

In regard to the commenter’s request to show the existing SOI on all figures, the DEIR analyzes the environmental impacts of build-out of the proposed General Plan Update Land Use Diagram, which is represented by the proposed SOI. That is the primary purpose of the environmental document. As such, it is appropriate to show the proposed SOI (rather than the existing SOI) on figures throughout the environmental analysis sections of the DEIR.

Response E-4: The commenter requests that language be added to page 3.0-28 of the DEIR to indicate that LAFCo reviews and evaluates SOI updates and
amendments for cities and special districts. The commenter also notes that while it may be utilized for the SOI update, the City should not expect to rely solely on the General Plan Update EIR to support or mitigate project-specific impacts associated with future annexations to the city.

The DEIR has been revised to address the commenter’s request for additional language to be added to page 3.0-28. See Section 4.0, Minor Revisions to the Draft EIR, of this FEIR on pg. 4.0-1.

The City agrees with the commenter’s statement that site- and project-specific impacts of annexations may not be supported/mitigated solely by the General Plan Update EIR. On page 1.0-3, the DEIR confirms, “The program-level analysis [in this DEIR] considers the broad environmental effects of the overall proposed General Plan Update.” In addition, subsection 1.3 of the DEIR notes, “When individual projects or activities under the General Plan are proposed, the City would be required to examine the projects or activities to determine whether their effects were adequately analyzed in this EIR as provided under CEQA Guidelines Sections 15168 and 15183.”

Response E-5: The commenter asks when build-out of the existing Chico SOI is expected to occur.

Given the multitude of unknown factors beyond the City’s control that will affect the timing of development, anticipating a buildout year for the existing SOI is considered to be speculative. For example, there is currently a large supply of entitled, vacant land in the City that can accommodate thousands of new residents. In addition, it is not possible to predict land owners’ willingness to develop or the outcome of future environmental reviews. The proposed General Plan Land Use Diagram is designed to accommodate more than the population estimated for the year 2030. Growth projections, including projected job and housing needs in 2030 and projected buildout conditions associated with the General Plan Update, are discussed in Section 4.0, Introduction to the Environmental Analysis and Assumptions Used, of the DEIR.

Response E-6: The commenter notes that the Local Adopted General Plans subsection on page 4.0-5 of the DEIR should be revised to reflect the recent adoption of the County’s updated General Plan.

According to Section 15125 of the CEQA Guidelines, “An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published...from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.” A lead agency therefore is not necessarily required to update an EIR based on changes that have occurred since the Notice of Preparation (NOP) was released.

The City prepared and publicly circulated a Notice of Preparation of an EIR for the proposed General Plan Update on December 10, 2008.
Consistent with Section 15125 of the CEQA Guidelines, the environmental conditions that existed on December 10, 2008 are considered the baseline physical conditions for the DEIR. At that time, the County’s updated General Plan had not yet been adopted. In fact, the County adopted its updated General Plan on October 26, 2010, which was almost one month after the Chico General Plan Update DEIR was released for public review in September 2010. Furthermore, the DEIR acknowledges the County’s General Plan update process in its cumulative setting and impact analysis. The County’s adoption of its updated General Plan does not change the overall environmental context under which the significant effects of the proposed project were considered. Therefore, the City is not required to update this or other discussions in the DEIR regarding the County’s General Plan.

However, the City shares the commenter’s attention to accuracy and up-to-date information in the DEIR and, as such, has added a note to the text of the DEIR to inform the reader of adoption of the Butte County General Plan 2030. See Section 4.0, Minor Revisions to the Draft EIR, of this FEIR on pg. 4.0-1.

Response E-7: The commenter asks why Tables 4.0-2 and 4.0-3 exclude growth projections for Chico. The commenter also states that the DEIR does not contain a table that shows five-year population and housing projections to 2030 for the city.

Tables 4.0-2 and 4.0-3 show housing and population projections that the Butte County Association of Governments (BCAG) anticipates in Butte County by the year 2030. As discussed on page 4.0-5 of the DEIR, these tables represent regional growth projections considered in the cumulative setting conditions of the DEIR. As defined in Section 15355 of the CEQA Guidelines, a cumulative impact consists of an impact that is created as a result of the combination of the project (which in this case is the proposed Chico General Plan Update) together with other projects causing related impacts. As Tables 4.0-2 and 4.0-3 show projected housing units and population in the region outside of Chico, they illustrate “other projects” that, in combination with the City of Chico’s growth, represent the cumulative setting. Table 4.0-1 of the DEIR shows projected population and housing needs in the city to 2030 and build-out projections for Chico.

The commenter is correct in stating that the DEIR does not show five-year growth projections to 2030 for the city. However, as stated on page 4.0-3 of the DEIR, future development that occurs in accordance with the proposed General Plan Update will be incremental and timed in response to market conditions. Therefore, interim phases or development scenarios are not evaluated in the DEIR as they would be speculative. The DEIR’s analysis of the environmental effects of the proposed General Plan Update is based on the build-out condition, which is identified in Table 4.0-1, and on average estimated development assumptions established in keeping with the land use designations and policies in the proposed General Plan Update (page 4.0-2 of the DEIR).
Response E-8: The commenter notes that the Butte County General Plan/Proposed Butte County General Plan 2030 subsection on page 4.1-3 of the DEIR should be revised to reflect the recent adoption of the County’s updated General Plan.

The commenter is referred to Response E-6. Furthermore, on page 4.1-4 and immediately following the subsection referenced by the commenter, the DEIR includes a discussion of the Butte County 2030 General Plan and its land use designations in the areas around Chico.

A note has been added to the text of the DEIR to inform the reader of adoption of the Butte County General Plan 2030. See Section 4.0, Minor Revisions to the Draft EIR, of this FEIR on pg. 4.0-1.

Response E-9: The commenter notes that Figure 4.1-1 of the DEIR should be revised to reflect the new land use designations created in the County’s recently adopted General Plan.

The figure has been revised to reflect the adopted Butte County General Plan 2030 land use designations. See Section 4.0, Minor Revisions to the Draft EIR, of this FEIR on pg. 4.0-15.

Response E-10: The commenter states that page 4.1-7 of the DEIR should be revised to include a discussion of wastewater disposal in the Chapman-Mulberry Neighborhood Plan area. According to the commenter, the City is currently expanding sewer lines to the area, which will allow for connection to the City’s sanitary sewer system and the abandonment of existing septic systems in the area.

The DEIR has been revised to address the comment. See Section 4.0, Minor Revisions to the Draft EIR, of this FEIR on pg. 4.0-1.

Response E-11: The commenter states that, in order to provide additional information to the reader, the Butte Local Agency Formation Commission (Butte LAFCo) subsection on page 4.1-9 of the DEIR could be revised to describe the composition of Butte LAFCo.

The DEIR has been revised to address the comment. See Section 4.0, Minor Revisions to the Draft EIR, of this FEIR on pg. 4.0-2.

Response E-12: The commenter references page 4.2-1 of the DEIR and asks how large the Vanella Orchard agricultural operation is. The commenter also states that data from the 2009 Butte County Agricultural Commissioner's Crop Report should be used to ensure an up-to-date EIR.

The Vanella Orchard agricultural operation is approximately 32 acres.

In regards to the 2009 Butte County Agricultural Commissioner's Crop Report, the commenter is referred to the discussion of the environmental setting/baseline in Response E-6. The 2008 data from the Butte County Agricultural Commissioner's Crop Report cited on page 4.2-1 of the DEIR is used to illustrate the point that "agricultural operations are a significant
3.0 RESPONSES TO COMMENTS

feature in the economy of Butte County.” The 2009 data was not available at the time the NOP for the DEIR was released, nor would the inclusion of the 2009 data in the DEIR change the overall environmental context under which the significant effects of the proposed project were considered. Therefore, it is not necessary to update this data for the reasons discussed under Response E-6.

Response E-13: The commenter states that the Existing Butte County Agricultural Operations subsection on page 4.2-1 of the DEIR should be revised with data from the 2009 Butte County Agricultural Commissioner's Crop Report to ensure an up-to-date EIR.

The commenter is referred to Response E-12.

Response E-14: The commenter points out that the Farmland Classifications and Rating System subsection on page 4.2-2 of the DEIR does not describe prime agricultural land as defined by Section 56064 of the California Government Code. The commenter explains that any environmental documents associated with projects requiring LAFCo approval should disclose the degree of impact to prime agricultural land as defined by the California Government Code.

According to 2002 Natural Resources Conservation Service Soil Survey Geographic (NRCS SSURGO) soils metadata, there are no lands in the Chico Planning Area that meet the 80 through 100 Storie Index Rating criteria for LAFCo prime agricultural land. However, two of the most prominent soils in the Planning Area — Bosquejo clay and Almendra loam — are considered prime agricultural land if irrigated. Several of the other, less prominent, soils in the Planning Area are also considered prime agricultural land. The DEIR has been revised to reflect this information, as well as the description of prime agricultural land as defined by Section 56064 of the California Government Code. See Section 4.0, Minor Revisions to the Draft EIR, of this FEIR on pg. 4.0-2.

However, it should be noted that CEQA uses the Farmland Mapping and Monitoring Program’s definition of Important Farmland. Therefore, the environmental impacts in the DEIR are evaluated based on Appendix G of the CEQA Guidelines, which state that an agricultural resource impact would be considered significant if the project would convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use.

Response E-15: The commenter states that the Williamson Act Contracts subsection on page 4.2-10 of the DEIR should be revised to state that there are no parcels subject to Williamson Act contracts in the existing or proposed SOI.

The DEIR has been revised to address the comment. See Section 4.0, Minor Revisions to the Draft EIR, of this FEIR on pg. 4.0-3.
Response E-16: The commenter notes errors in the legend for Figure 4.2-2, stating that the Prime Agricultural Land legend should be labeled Williamson Act Contracts and that the Non-Prime Agricultural Land legend shows Williamson Act contracts.

The commenter is correct in noting that both the prime and non-prime agricultural lands shown in Figure 4.2-2 represent Williamson Act lands. The map in Figure 4.2-2 is based on the Department of Conservation (DOC) map entitled Butte County Williamson Act Lands 2006, Land Enrolled in Williamson Act and Farmland Security Zone Contracts as of 01-01-2006, which identifies both prime and non-prime Williamson Act lands in Butte County. According to this DOC map, Williamson Act prime agricultural land is “land which is enrolled under California Land Conservation Act contract and meets any of the criteria set forth under California Government Code Section 51201.” Williamson Act non-prime agricultural land is “land which is enrolled under California Land Conservation Act contract and does not meet any of the criteria for classification as Prime Agricultural Land.” Therefore, the prime and non-prime Williamson Act lands identified in Figure 4.2-2 are correctly labeled and depicted. However, for clarity, the legend will be revised to state “Williamson Act – ” in front of each agricultural classification. See Section 4.0, Minor Revisions to the Draft EIR, of this FEIR on pg. 4.0-3.

Response E-17: The commenter states that the various LAFCo policies regarding conversion and protection of agricultural lands should be noted under the Local subsection on page 4.2-15 of the DEIR.

The DEIR has been revised to address the comment. See Section 4.0, Minor Revisions to the Draft EIR, of this FEIR on pg. 4.0-4.

Response E-18: The commenter commends the City for including policies in the General Plan that protect agricultural resources. However, the commenter goes on to recommend that the City include a policy requiring development to mitigate the conversion of agricultural lands, similar to a policy in the Gridley General Plan that calls for in-lieu fees or direct placement of agricultural conservation easements.

As discussed under Impact 4.2.1 of the DEIR, the intent of the proposed General Plan Update is to accommodate anticipated growth through compact, infill, and mixed-use development, as well as focusing intensified redevelopment along transit corridors and at other key locations, to confine growth to the immediate Chico area. These development patterns are proposed expressly to avoid the effects of sprawling development on agricultural areas.

The commenter’s example of Gridley’s EIR agriculture land conversion mitigation, requiring the payment of in-lieu fees to acquire agriculture conservation easements, does not recognize the different circumstances between Chico and Gridley. As part of its General Plan update, the City of Gridley redesignated for future urban uses 1,200 acres of land previously designated agriculture and currently in agriculture production. In contrast, the City of Chico is not proposing to redesignate any land that
is currently designated for agriculture, and all land currently in agricultural use within the General Plan Update proposed SOI has been designated for urban uses for at least 16 years.

The majority of important farmlands in the Planning Area are outside of the proposed SOI and are designated for resource conservation or agricultural use by the County, thereby not threatened by urban development. In addition, the proposed General Plan Update supports the existing Greenline, which has been in place for over 30 years, by not proposing any urban development beyond it. Preserving the Greenline is the single most effective way to protect prime agricultural farmland.

Although the proposed General Plan Update does designate a small amount of important farmlands for urban development, these areas were already identified for urban development in the 1994 General Plan, and/or the farmlands have been compromised by parcelization and previous development. For example, the North Chico Special Planning Area has been slated for urban development by both the City and Butte County for over 15 years, and the County has an adopted Specific Plan with associated environmental review for the area. Also, the 30-acre Vanella Orchard site, which is completely surrounded by single-family residences in the core of the city, has been considered for urban development for over two decades. The Bell-Muir SPA, while outside of the City’s existing SOI, is highly parcelized and has seen significant single-family development under the County’s jurisdiction, compromising the area’s agricultural viability. Regardless, the General Plan Update commits the City to integrate agricultural uses into future planning of the Bell-Muir area, if or when development ultimately occurs.

Furthermore, project-specific impacts to the loss of important farmlands have been considered for many similar areas. For example, the Final EIR for the Northwest Chico Specific Plan (State Clearinghouse No. 2004082087) concluded that development under the Specific Plan would result in a significant and unavoidable loss of important farmlands, but that the loss was appropriate given the need to accommodate future housing and jobs for a growing city population. A similar conclusion was reached for much of the agricultural land in question during the 1994 General Plan environmental review process.

For the limited amount of unentitled agricultural land within the proposed SOI that could be converted as part of General Plan buildout, the benefits of an agriculture conversion mitigation similar to the Gridley example in Chico are minimal. Based on the limited acreage to be converted and cost of easements, such an in-lieu fee program in Chico would likely not generate sufficient funds to support a coordinated easement program to significantly protect agricultural resources. Those programs are generally developed and applied when large tracts of land designated agriculture and in agriculture production are being incorporated into a City for urban development. Instead, the General Plan Update’s greenline policy and its commitment to infill, redevelopment, mixed-use and intensified new growth are more appropriate tools for protecting and preserving

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agricultural resources given the type of growth anticipated in Chico’s General Plan Update.

Response E-19: The commenter suggests that subsection 4.3.1 of the DEIR include 2009 and 2010 Department of Finance population data in the EIR to ensure that the data is as accurate and up to date as possible.

The commenter is referred to Response E-6. Furthermore, the existing setting population and housing data used in the DEIR is consistent with population and housing data contained in the City’s 2009–2014 Housing Element, which was adopted by the City in August 2009. As described on page 4.3-7 of the DEIR, the Housing Element identifies and analyzes existing and projected housing needs of Chico and states goals, policies, and actions for the preservation, improvement, and development of housing. As such, it is appropriate that the proposed General Plan Update is consistent with the Housing Element in terms of existing setting data.

Response E-20: In reference to the Funding subsection on page 4.12-16 of the DEIR, the commenter inquires about the current police protection building and equipment fees for new development.

This comment does not pertain to the adequacy of the environmental analysis contained in the DEIR. However, the following is provided to the commenter and added to the DEIR for informational purposes. See Section 4.0, Minor Revisions to the Draft EIR, of this FEIR on pg. 4.0-7.

The current police protection building and equipment fees for new development are $834 for single-family residences and $940 for multi-family residences.

Response E-21: The commenter points out a typo on page 4.12-36 of the DEIR.

The DEIR has been revised to address the comment. See Section 4.0, Minor Revisions to the Draft EIR, of this FEIR on pg. 4.0-8.

Response E-22: The commenter states that more information on wet weather flows should be provided in subsection 4.12.5, Wastewater Service, of the DEIR. The commenter suggests that a table showing average flows for each month of the year would show the difference between dry and wet weather flows and would indicate how much inflow and infiltration is occurring in the City’s sewer system.

This comment does not pertain to the adequacy of the environmental analysis contained in the DEIR. However, the following is provided to the commenter and added to the DEIR for informational purposes. See Section 4.0, Minor Revisions to the Draft EIR, of this FEIR on pg. 4.0-10.
3.0 RESPONSES TO COMMENTS

CHICO WPCP AVERAGE MONTHLY INFLUENT FLOW 2008 AND 2009

<table>
<thead>
<tr>
<th>Month</th>
<th>Influent Flow (MGD)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2008</td>
</tr>
<tr>
<td>January</td>
<td>8.4</td>
</tr>
<tr>
<td>February</td>
<td>8.8</td>
</tr>
<tr>
<td>March</td>
<td>7.4</td>
</tr>
<tr>
<td>April</td>
<td>7.3</td>
</tr>
<tr>
<td>May</td>
<td>7.0</td>
</tr>
<tr>
<td>June</td>
<td>6.3</td>
</tr>
<tr>
<td>July</td>
<td>6.7</td>
</tr>
<tr>
<td>August</td>
<td>7.0</td>
</tr>
<tr>
<td>September</td>
<td>7.3</td>
</tr>
<tr>
<td>October</td>
<td>7.1</td>
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<tr>
<td>November</td>
<td>7.4</td>
</tr>
<tr>
<td>December</td>
<td>7.2</td>
</tr>
<tr>
<td>Yearly Average</td>
<td>7.3</td>
</tr>
</tbody>
</table>


Response E-23: In reference to page 4.12-62 of the DEIR, the commenter inquires about the current monthly sewer service charge, as well as the various connection fees for new development.

This comment does not pertain to the adequacy of the environmental analysis contained in the DEIR. However, the following is provided to the commenter and added to the DEIR for informational purposes. See Section 4.0, Minor Revisions to the Draft EIR, of this FEIR on pg. 4.0-11.

The current monthly sewer service charge is $16.75 per unit in the City of Chico and $17.44 per unit in unincorporated County areas. The City’s sewer connection fees are shown in the table below. The table does not include Lift Station Fees, which are specific to certain areas served by lift stations and can only be determined on a case by case basis.

SEWER CONNECTION FEES

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Trunk</th>
<th>Plant</th>
<th>Main Front Ft.</th>
<th>Lateral Linear Ft.</th>
<th>Unit Of Measure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Single Family Residential</td>
<td>$1,693.00</td>
<td>$2,251.00</td>
<td>$46.09</td>
<td>$28.63</td>
<td>unit/ff/lf</td>
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<tr>
<td>Multiple Family Residential</td>
<td>$1,693.00</td>
<td>$2,251.00</td>
<td>$46.09</td>
<td>$28.63</td>
<td>unit/ff/lf</td>
</tr>
<tr>
<td>Motel/Hotel with restaurant facilities</td>
<td>$1,693.00</td>
<td>$2,251.00</td>
<td>$46.09</td>
<td>$28.63</td>
<td>room</td>
</tr>
<tr>
<td>Motel/Hotel without restaurant facilities</td>
<td>$847.00</td>
<td>$1,125.00</td>
<td>$46.09</td>
<td>$28.63</td>
<td>room</td>
</tr>
<tr>
<td>Convalescent Hospitals</td>
<td>$847.00</td>
<td>$1,125.00</td>
<td>$46.09</td>
<td>$28.63</td>
<td>bed</td>
</tr>
</tbody>
</table>
### Land Use

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Trunk</th>
<th>Plant</th>
<th>Main Front Ft.</th>
<th>Lateral Linear Ft.</th>
<th>Unit Of Measure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hospitals</td>
<td>$1,270.00</td>
<td>$1,688.00</td>
<td>$46.09</td>
<td>$28.63</td>
<td>bed</td>
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<tr>
<td>Dormitory, Group Dwelling w/ Food Services, or, Boarding House</td>
<td>$564.00</td>
<td>$750.00</td>
<td>$46.09</td>
<td>$28.63</td>
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<tr>
<td>Dormitory without Food Services, or Rooming House</td>
<td>$282.00</td>
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<tr>
<td>Schools</td>
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<td>$245.00</td>
<td>$46.09</td>
<td>$28.63</td>
<td>fte</td>
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<tr>
<td>Park or Recreational Facility</td>
<td>$85.00</td>
<td>$113.00</td>
<td>$46.09</td>
<td>$28.63</td>
<td>fu</td>
</tr>
<tr>
<td>All other</td>
<td>$6,773.00</td>
<td>$9,003.00</td>
<td>$46.09</td>
<td>$28.63</td>
<td>acre</td>
</tr>
</tbody>
</table>

**Response E-24:**

In reference to page 4.12-65 of the DEIR, the commenter asks how many reportable sanitary sewer overflows have occurred in the City’s sewer system since mandatory reporting began.

This comment does not pertain to the adequacy of the environmental analysis contained in the DEIR. However, the following is provided to the commenter and added to the DEIR for informational purposes.

According to the California Integrated Water Quality System, which details sanitary sewer overflows reported to the State Water Resource Control Board, the Chico sewer system had five sanitary sewer overflows during the 10-year time period between January 2000 and December 2010. Of the 2,080 gallons discharged during those five overflows, 2,010 gallons were recovered ([http://www.waterboards.ca.gov/ciwqs/](http://www.waterboards.ca.gov/ciwqs/), accessed December 19, 2010).

**Response E-25:**

The commenter asks when the City will be required to obtain new waste discharge requirements from the Regional Water Quality Control Board (RWQCB) and if major upgrades to the City’s Water Pollution Control Plant (WPCP) are anticipated as a result of those requirements. The commenter also asks how upgrades would be funded.

As discussed on page 4.12-70 of the DEIR, the Chico WPCP is currently operating under Order No. R5-2004-0073, which allows the discharge of up to 9 million gallons per day (mgd) of average dry weather (July-September) flow and includes effluent limitations for copper, lead, zinc, bromodichloromethane, dibromochloromethane, biochemical oxygen demand, total suspended solids, coliform organisms, and chlorine residual. The City is currently constructing a treatment capacity expansion for the WPCP, which will increase capacity to 12 mgd, and an additional upgrade to 15 mgd by 2017 is proposed. The City plans to renew the National Pollutant Discharge Elimination System (NPDES) permit as part of the current WPCP expansion project or before the planned effluent flow exceeds 9 mgd during dry weather, whichever occurs first. Any future expansion of the WPCP would require submission of a Report of Waste Discharge (RWD) to the RWQCB. The RWD would request an increase in the permitted flow capacity and would be submitted and approved by
the RWQCB prior to operation of the expanded plant. The City is not currently exceeding any limits established in its current Waste Discharge Requirements and will be required by the RWQCB to remain in compliance after any future expansion of flow capacity.

As discussed on pages 4.12-62 through -63 of the DEIR, the City typically funds infrastructure and services through the General Fund and the City’s Capital Improvement Program, which identifies the revenue source through which specific projects are funded. The City also collects impact fees from development projects. In addition, the WPCP expansion is eligible for the State Revolving Fund (SRF), which is a revolving loan program that provides low interest loans to address water quality problems associated with discharges from wastewater and water reclamation facilities. Funds for the program are administered by the State Water Resources Control Board and provided in part by the United States Environmental Protection Agency.

Response E-26: Referencing subsection 7.3, Significant and Unavoidable Impacts, of the DEIR, the commenter explains that LAFCo has the responsibility to address issues relevant to the provision of services and impacts to other agencies and logical growth management practices based on the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000. As such, the commenter states that LAFCo may arrive at alternate views of impacts identified as significant and unavoidable in the DEIR unless the City provides a more thorough analysis at such time as individual projects are proposed for LAFCo consideration.

As discussed under Response E-4, the City understands that site- and project-specific impacts of projects requiring for LAFCo consideration may need additional environmental analysis beyond the General Plan Update EIR.
3.0 RESPONSES TO COMMENTS

Letter F

PHYLIS L. MURDOCK, DIRECTOR
MARK A. LUNDBERG, M.D., M.P.H., HEALTH OFFICER
WWW.BUTTECOUNTY.NET/PUBLICHEALTH

ENVIRONMENTAL HEALTH DIVISION

DATE: December 1, 2010
TO: Brendan Vieg, Planning Services Department, City of Chico
FROM: Vance Severin, Deputy Director, Environmental Health
RE: Draft Environmental Impact Report, City of Chico 2030 General Plan Update

Thank you for the opportunity to comment on the Draft EIR for the City of Chico 2030 General Plan Update. I have the following comments:

Section 4.4, page 24,

The first sentence should read “The Environmental Health Division of the Butte County Public Health Department is the CUJA for Butte County.” Environmental Health is not a separate County department.

Section 4.4, page 40, fourth paragraph:

The paragraph is basically correct in that the five gallon hazardous waste transportation limit applies in most circumstances. It is noted, however, that Conditionally Exempt Small Quantity Generators may transport up to 100 kilograms or approximately 27 gallons of hazardous waste to a Household Hazardous Waste Facility, with facility approval. A Household Hazardous Waste Facility operated by a public agency or its contractor may authorize transportation of up to 15 gallons of hazardous waste, if the public agency finds that adequate public education has been performed to provide for safe handling and transportation.

It is also noted that the applicable license is for hazardous waste transportation, not hazardous materials.

4.4, page 41, first paragraph;

The first section should refer to the of Butte County Environmental Health Division, not Department. The Environmental Health Division is not authorized to enforce the Code of Federal Regulations.

4.6, page 42:

I suggest the last two lines on the page be changed to read:
Letter F Continued

Brendan Vieg, City of Chico
December 1, 2010
Page 2 of 2

No feasible mitigation measures have been identified that can further offset air pollution emissions from the subsequent development and growth under the proposed General Plan Update.

4.12.5.2, page 68, first paragraph:

The Butte County On-Site Wastewater Ordinance was adopted March 16, 2010 and became effective in June 2010. I recommend that this paragraph be updated to reflect the adoption of this ordinance. Additionally, I recommend that the word “unincorporated” be deleted from the second sentence in the paragraph.
3.0 RESPONSES TO COMMENTS

COMMENT F – VANCE SEVERIN, BUTTE COUNTY PUBLIC HEALTH DEPARTMENT

Response F-1: In reference to page 4.4-24 of the DEIR, the commenter notes that Environmental Health is not a separate County department.

The DEIR has been revised to address the comment. See Section 4.0, Minor Revisions to the Draft EIR, of this FEIR on pg. 4.0-4.

Response F-2: The commenter references the fourth paragraph on page 4.4-40 of the DEIR and notes several instances in which hazardous waste can be transported in quantities greater than five gallons. The commenter also notes that the applicable license is for hazardous waste transportation rather than hazardous material transportation.

The DEIR has been revised to address the comment. See Section 4.0, Minor Revisions to the Draft EIR, of this FEIR on pg. 4.0-4.

Response F-3: The commenter states that page 4.4-41 of the DEIR should reference the Butte County Environmental Health Division rather than Department. The commenter also notes that the Environmental Health Division is not authorized to enforce the Code of Federal Regulations.

The DEIR has been revised to address the comment. See Section 4.0, Minor Revisions to the Draft EIR, of this FEIR on pg. 4.0-5.

Response F-4: The commenter suggests revisions to the last two lines on page 4.6-42 of the DEIR.

The commenter is referred to Response 2a-1, as well as to Section 4.0, Minor Revisions to the Draft EIR, of this FEIR on pg. 4.0-6.

Response F-5: The commenter notes that the Butte County On-Site Wastewater Ordinance was adopted in March of 2010 and became effective in June 2010 and recommends that subsection 4.12.5.2 of the DEIR be revised to reflect this information. The commenter also recommends that “unincorporated” be deleted from the second sentence in the paragraph.

The commenter is referred to Response E-6. In addition, the DEIR has been revised to address the comment. See Section 4.0, Minor Revisions to the Draft EIR, of this FEIR on pg. 4.0-8.
3.0 RESPONSES TO COMMENTS

Letter 1a

November 29, 2010

Chico City Council, Chico Planning Commission, Chico Planning Staff
411 Main Street
Chico, CA 95928

Dear Chico City Councilors, Planning Commissioners and Planning Staff:

As Conservation Chair of the Yahi Group of the Sierra Club, I would like you to please address a major concern about Chico’s Draft Environmental Impact Report:

Although I strongly applaud the fact that the General Plan and DEIR include specific mention of the importance of sustainability and discussion of numerous related aspects, what is absent (unless I missed it) is a provision stating that PRIORITIZING Sustainability will be a guiding principle for new projects, now and in coming decades. Such a statement should be accompanied by an explanation that the city will do such prioritizing in order to prevent the “significant and unavoidable” environmental impacts on our community’s natural resources (that you have listed in the current DEIR) and to preserve our natural resources. Such a statement will, therefore, make the huge amount of work you have done more “internally consistent,” i.e., future project decisions will reflect the amount of importance that the General Plan places on sustainability.

The General Plan states the following:

SUSTAINABILITY IN DECISION-MAKING
Creating and maintaining a sustainable community will require incorporating sustainable principles into the City’s everyday actions and decisions, monitoring progress, and adapting to changing conditions and new information. The General Plan has incorporated sustainable principles into every element; therefore, decisions that are consistent with the goals and policies of the Plan will advance the overarching goal of sustainability.

Councilman Andy Holcombe had recommended prioritizing city projects at a public meeting (which I addressed in my August 4, 2010, letter to the city). Holcombe’s priorities were infill, urban transit corridors (for bikes, buses, cars, and presumably, pedestrians), and mixed residential and business uses in our urban core. Now, what makes even more sense in terms of how to prioritize is incorporation of the sustainability goals listed in General Plan 2030. We, therefore, ask that you revise the Environmental Impact Report to state that decision-makers will evaluate every project that could have impacts on the environment, according to the Goals listed in the Sustainability element. Moreover, the reason for doing so should be directly stated: to prevent, as much as possible, the significant and unavoidable impacts listed in the current DEIR, and to preserve our natural resources.

The Goals listed in Sustainability Element are:

Goal SUS-1: Balance the environment, economy and social equity, as defined in the General Plan, to create a sustainable Chico.
Goal SUS-2: Increase effective citizen participation in local government.
Goal SUS-3: Lead the way to a sustainable Chico by reducing the environmental impact of City operations.
Letter 1a Continued

Goal SUS-4: Encourage green development.
Goal SUS-5: Increase energy efficiency and reduce non-renewable resource consumption Citywide.
Goal SUS-6: Reduce the level of carbon emissions Citywide.
Goal SUS-7: Support local food systems in Chico.

Without first considering these goals before deciding on any project, how can the city’s General Plan and EIR show true consistency with its stated mission to promote sustainability? We acknowledge that prioritizing sustainability in our decision-making requires ongoing education of the public, city leaders, and staff— with constant updating as changes occur to our natural resources. Making these priorities explicit for every project will help make sustainability an increasingly significant component of Chico’s culture. Please let us know how you plan to address this concern.

Thank you.

Sincerely,
Grace M. Marvin,
Conservation Chair
Sierra Club, Yahi Group
Comment 1A – Grace M. Marvin, Sierra Club, Yahi Group

Response 1a-1: The commenter applauds that the proposed General Plan Update and DEIR discuss the importance of sustainability, but goes on to say that a provision stating that prioritizing sustainability will be a guiding principle for new development is missing. The commenter suggests that such a provision should state that the City will prioritize sustainability in order to avoid the significant and unavoidable impacts to natural resources that are identified in the DEIR.

As stated on page 3.0-8 of the DEIR, a general plan serves as a blueprint for future development and identifies the overall vision for the planning area. In the case of the proposed Chico General Plan Update, the goals and associated policies and actions are intended to work together toward achieving sustainability. To establish a sustainable development trend for the community, the General Plan identifies and promotes certain development patterns, including compact urban development, infill development and redevelopment, mixed-use development, complete neighborhoods, and a variety of housing types. The General Plan Update further seeks to preserve and enhance the city’s older neighborhoods, promote economic development, protect sensitive environmental resources, and provide open space and parks. In fact, the proposed General Plan Update is based on a new vision for the community in which sustainability is considered an organizing principle (page 3.0-8 of the DEIR). As the General Plan will serve as blueprint, or guide, for all future development in the city and given that sustainability is an organizing principle of the General Plan, sustainability will inherently be a guiding principle of future development under the General Plan. Furthermore, all new development proposed in the city will be required to demonstrate consistency with General Plan policies and actions. As such, future projects that could have environmental impacts will be considered in the context of the goals, policies, and actions in the Sustainability Element of the General Plan Update, and a policy provision requiring such consideration would be considered redundant.

The commenter is particularly concerned with sustainability in terms of the prevention of significant and unavoidable environmental impacts and the preservation of natural resources. However, the City must consider the interdependent interests of protecting the environment, promoting social equity, and achieving a healthy economy. These goals are often competing and, as such, the City must attempt to balance them in all of its actions and programs. The proposed General Plan Update includes ample policy provisions for protecting the environment including promoting compact, walkable, infill and mixed-use development; focusing redevelopment along transit corridors and at other key locations; protecting sensitive habitat, open space, and agricultural lands; promoting the efficient use of energy and resources; improving local air and water quality; directing waste diversion and reduction; and establishing energy and water conservation measures in building, landscaping, and municipal operations. The General Plan Update attempts to balance these provisions with those that provide for a sustainable economy and equity. Therefore, the significant and
unavoidable environmental impacts identified in the DEIR are considered acceptable in light of the economic, social, and other benefits that the General Plan will produce. According to Section 15093(a) of the CEQA Guidelines, CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve a project. If the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered “acceptable.” It is also worth noting that the Alternatives analysis in the Draft EIR (Section 6.0) concluded that even without adoption and implementation of the General Plan Update, that growth and development under the existing 1994 General Plan would result in the same significant and unavoidable impacts.

Finally, it should be noted that since the public release of the DEIR, changes have been made to the proposed General Plan Update; these changes are discussed in Section 5.0 of this FEIR. Changes to the Sustainability Element serve to strengthen the City’s focus on sustainability. For example, added Action SUS-1.5.3 requires the City to develop a Chico Green Business certification program to recognize local businesses that implement measures to conserve energy and water, minimize waste, and prevent pollution. Added Action SUS-3.3.3 requires monitoring of each City department’s progress toward reducing the environmental impact of City operations. Other goal, policy, and action changes throughout the General Plan Update have served to strengthen the policy documents commitment to sustainable growth.

**Response 1a-2:**

The commenter cites sustainability priorities discussed by Councilman Andy Holcombe at a public meeting (infill, urban transit corridors, and mixed residential and business uses in the city’s urban core) and requests that the DEIR be revised to state that decision-makers will evaluate every project that could have environmental impacts according to the goals in the Sustainability Element of the General Plan Update. The commenter states that the DEIR should state that the reason for doing so is to prevent significant and unavoidable impacts and preserve resources.

The commenter is referred to Response 1a-1.

**Response 1a-3:**

The commenter lists the goals in the Sustainability Element of the General Plan Update and asks how the DEIR and General Plan Update show consistency in the stated mission to promote sustainability without first considering the goals. The commenter acknowledges that prioritizing sustainability in decision-making requires ongoing education of the public and City leaders and staff but states that making priorities explicit for every project will help make sustainability an increasingly significant component of Chico’s culture. The commenter asks how the City plans to address this concern.

The commenter is referred to Response 1a-1. Also, each of the Sustainability policies in the General Plan Update is supported by a series
of actions that direct City resources and energy towards achieving the policy.
Verbal Comment 1b

Grace Marvin: Hi, I'm Grace Marvin. I just have a couple questions. I haven't reviewed everything thoroughly, but I do have questions regarding the Draft EIR. There is mention of, for example, the Otterson Drive area, and I thought – I was gone in October – but I thought that that had been taken off the table, and that it no longer was going to be considered part of the General Plan.

Vieg: I can answer that question, but if you have questions like that, we don't need to do that at this meeting. You can contact me any time in my office...

Grace Marvin: Oh, okay, okay...

Vieg: ...but the project description for the Draft EIR obviously is the General Plan itself, and Council’s direction as it relates to the West Park Avenue extension was to retain it as a future area or future roadway to study. So the line on the circulation plan retains that, a connection, in that area.

Grace Marvin: Okay, and with regard to the Butte Creek Canyon project and the Doe Mill projects, has it been, have you done a truly sustainable analysis to see whether infill might not be a far better move than to try to develop a outlying community that would, it result in more sprawl?

Vieg: So, in this case, you would have a comment that would be you think there needs to be more of an emphasis placed on doing an analysis of a more infill-type development scenario, and let me just add that the Alternatives section of the EIR, that's a required aspect of an Environmental Impact Report, does have a more infill alternative. It's, it mirrors the Alternative C early on in the planning process, so that is looked at as an alternative and compared and juxtaposed against the proposed project.

Grace Marvin: Okay, so in other words, this General Plan and this EIR, they're not saying that necessarily one alternative will be chosen over the others?

Vieg: It looks at the proposed project in a higher level of detail than it does the alternatives, but it does contain an analysis of the alternatives and compares those in a section called Alternatives.

Grace Marvin: Okay, okay, thank you. I think I'd better ask you more questions, in your office.
3.0 RESPONSES TO COMMENTS

COMMENT 1B – GRACE M. MARVIN, SIERRA CLUB, Yahi Group (Verbal)

Response 1b-1: The commenter states that she thought the Otterson Drive area was no longer being considered part of the General Plan.

The comment does not pertain to the adequacy of the environmental analysis contained in the DEIR. However, it should be noted that the Chico City Council direction regarding the West Park Avenue extension was to retain it as a future roadway to study. Therefore, the proposed circulation plan retains a connection in that area.

Response 1b-2: The commenter questions if a truly sustainable analysis has been done in regard to the Butte Creek Canyon and Doe Mill projects to see if infill would be better than developing an outlying area that would result in more sprawl. After a response by Mr. Vieg, the commenter goes on to ask if the EIR is saying that one alternative won’t necessarily be chosen over another.

The commenter is referred to Response 1a-1. In addition, the commenter is referred to Section 6.0, Alternatives, of the DEIR, which analyzes an Increased Density Alternative (Alternative 3). The Increased Density Alternative assumes significant redevelopment of mixed use at medium and higher densities within the 17 Opportunity Sites and limited expansion north and south in three SPAs (North Chico, Diamond Match, and South Entler) with no expansion to the east or west beyond the Greenline.
3.0 RESPONSES TO COMMENTS

Letter 2a

Hi Brendan

apologies for the late comments: Here they are:

From: Luke Anderson, Chico Healthy Air Alliance
Re: Comments to Chico General Plan Draft EIR
(My brief comments are limited to section 4.6 on Air Quality)

I am in agreement with the assessment on page 42 of 4.6 that the actions outlined in the general plan so far will not fully offset air pollutant emissions resulting from construction and operational activities and could violate or substantially contribute to a violation in nonattainment for O3, PM10, and PM2.5 under federal and state standards.

The conclusion, however, (written prominently as the final sentence of this air quality section) that there are 'no feasible mitigation measures that can further offset air pollutant emissions from subsequent development and growth under the proposed General Plan Update' is clearly a political opinion rather than scientific analysis, and is contrary to California and District recommendations on mitigation of air quality related impacts.

The CEQA handbook outlines on and off-site methods by which projects could choose to mitigate air pollution emissions to less than significant.

There is no intrinsic reason to fail to offset development and growth related air impacts; the choice is a political one. Surely it is undesirable to present this decision as having already been made (by who?) in an EIR.

In my opinion this choice is straightforward: will developers pay for air related impacts or will the public as a whole bear the costs through the considerable health burdens that will result from failure to reduce Chico's air pollution to healthy levels.

Please feel free to contact me if you have any further questions

Luke Anderson
1180 Palmetto Ave, Chico, CA 95926
530 891 6524
COMMENT RESPONSE 2A – LUKE ANDERSON, CHICO HEALTHY AIR ALLIANCE

Response 2a-1: The commenter agrees with the DEIR assessment on page 4.6-42 that actions outlined in the proposed General Plan Update will not fully offset air pollutant emissions resulting from construction and operation activities and could contribute to a violation of state and federal standards. The commenter feels, however, that the conclusion of no feasible mitigation is a political opinion rather than a scientific analysis and that it is contrary to California and BCAQMD recommendations on mitigation of air quality impacts.

Page 4.6-42 of the DEIR states that the criteria pollutants, reactive organic gas (ROG), nitrogen oxide (NOx), and carbon monoxide (CO) emissions are anticipated to decrease with General Plan build-out conditions versus existing conditions (2008) by 1,718, 6,747, and 38,941.77 pounds per day, respectively. This reduction in emissions is due to improvements in vehicle emission technology. However, as described under Impacts 4.6.2 and 4.6.3 in the DEIR, subsequent construction and development activity under the proposed General Plan Update would result in emissions in excess of Butte County Air Quality Management District (BCAQMD) thresholds for criteria air pollutants and precursors for which BCAQMD is in nonattainment. As further stated on page 4.6-42 of the DEIR, while implementation of proposed General Plan Update policies and actions would assist in preventing, reducing, and minimizing the proposed General Plan Update’s contribution to cumulative air quality impacts, this contribution is still considered cumulatively considerable and thus a significant and unavoidable impact as these actions might not fully offset air pollutant emissions resulting from future construction and operational activities in every circumstance, and violations or substantial contribution to a violation in an area already in nonattainment of federal and state standards could occur.

As stated in Section 21002.1(c) of the Public Resources Code, “If economic, social, or other conditions make it infeasible to mitigate one or more significant effects on the environment of a project, the project may nonetheless be carried out or approved at the discretion of a public agency if the project is otherwise permissible under applicable laws and regulations.” The setting for this cumulative analysis contained in the DEIR consists of the Sacramento Valley Air Basin (SVAB) and associated growth and development anticipated in the SVAB. While the policies and actions in the proposed General Plan Update would provide direction for growth within the Chico city limits only, throughout the air basin, various city and county municipalities address criteria pollutants within the SVAB under their own set of established regulatory provisions, outside of the regulatory influence of the proposed Chico General Plan Update. In addition, a considerable amount of criteria pollutants monitored in the SVAB results from pollutants that have been transported from the San Francisco Bay Area. Therefore, the only mitigation available to adequately reduce cumulative impacts resulting from criteria pollutants within the SVAB to a less than cumulatively considerable level would require inter-jurisdictional coordination between every municipality in the SVAB and likely even the Bay Area (due to the air pollutant transport from the Bay Area). The
magnitude of such an effort would likely be infeasible due to the reliance on other jurisdictions, beyond the control of the proposed General Plan Update or the City of Chico, to cooperate in a meaningful way.

Language has been added to the DEIR to clarify the infeasibility of further mitigating cumulative air quality impacts. See Section 4.0, Minor Revisions to the Draft EIR, of this FEIR on pg. 4.0-6.

Response 2a-2: The commenter notes that the CEQA handbook outlines on- and off-site mitigation by which projects could choose to mitigate air pollution emissions to less than significant.

It has been assumed that the commenter, in referring to “the CEQA handbook,” means the Butte County Air Quality Management District’s CEQA Air Quality Handbook (2008). The commenter is correct in stating that this document provides best available mitigation measures. BCAQMD acts as a responsible or commenting agency under CEQA and has prepared the CEQA Air Quality Handbook as an advisory document to assist lead agencies with procedures for addressing potential air quality impacts from development. Table 4.6-9 of the DEIR, located on pages 4.6-33 through -35, summarizes the level of compliance of the proposed General Plan Update with the BCAQMD-recommended emission reduction strategies and standard mitigation measures contained in the CEQA Air Quality Handbook. As shown in Table 4.6-9 of the DEIR, proposed General Plan Update policies intended to reduce air quality impacts are compliant with 25 separate BCAQMD-recommended emission reduction strategies and standard mitigation measures. Further, the General Plan Update directs through Action OS-4.1.2 that during project and environmental review, that air quality impacts will be evaluated and applicable mitigations to reduce impacts consistent with BCAQMD requirements will be incorporated.

It is important to note that while future, individual development projects, in conjunction with a mandatory air quality impact fee will be able to reduce air quality impacts to a less than significant level in almost all foreseeable cases, air quality pollutants would still be emitted from these individual development projects. For instance, although future individual development projects may not generate significant short-term emissions due to the District’s list of best available mitigation strategies located in the District’s CEQA Air Quality Handbook, it is highly likely that several of these future development projects would be under construction simultaneously in the city and would therefore generate a collective of construction emissions that could impact air quality.

Similarly, in terms of long-term operational air quality impacts, the DEIR determined that District-recommended mitigations would substantially reduce potential long-term operational air quality pollutants by regulating individual projects. However, impacts would still be significant and unavoidable because the greater region encompassing Chico is designated nonattainment for several federal and state standards and feasible mitigations would not fully offset air pollutant emissions.
3.0 RESPONSES TO COMMENTS

consequential to build-out of the proposed General Plan Update in this nonattainment region.

Response 2a-3:
The commenter states that there is no reason to fail to offset development- and growth-related air quality impacts and that it is undesirable to present the decision [not to offset impacts] as already being made in an EIR.

The commenter is referred to Response 2a-1. In addition, the proposed General Plan Update seeks to reduce the environmental impact of land use development by limiting the amount of land consumed and increasing the viability of walking, biking, and transit by balancing growth and conservation through the reinforcement of the city’s compact urban form, establishing urban growth limits, and managing where and how growth and conservation will occur. The proposed General Plan Update and its Land Use Diagram would provide for growth while minimizing outward expansion of the city’s boundaries, reduce increases in vehicle miles traveled within the city, and thus reduce air quality impacts. As shown in Table 4.6-9 of the DEIR, proposed General Plan Update policies intended to reduce air quality impacts are compliant with 25 separate BCAQMD-recommended emission reduction strategies and standard mitigation measures. In addition, the General Plan Update directs through Action OS-4.1.2 that during project and environmental review, that air quality impacts will be evaluated and applicable mitigations to reduce impacts consistent with BCAQMD requirements will be incorporated. However, even with implementation of all these proposed BCAQMD-conforming policies, the complete offset of air pollutant emissions resulting from future construction and operational activities may not be feasible in the case of every future potential development project. Therefore, the DEIR conservatively concludes that the General Plan Update’s proposed policies and actions intended to offset air pollutant emissions resulting from future construction and operational activities could not guarantee the complete offset of resultant air pollutant emissions in every potential future development scenario for the next twenty years.

Response 2a-4:
The commenter asserts that the decision is a straightforward one of whether or not developers will pay for air impacts or if the public will bear the costs via health burdens.

Section 4.6 of the DEIR cites six separate proposed policy provisions that mandate requirements of new development to financially contribute to air quality impact reduction mechanisms (pages 4.6-20 through 4.6-25). For example, Action CIRC-2.2.1 states that new development shall include internal circulation features such as a grid- or modified grid-based street system, traffic-calming measures, where appropriate, roundabouts as an alternative intersection control, where appropriate, bicycle and pedestrian connections to adjacent streets, trails, public spaces, and bicycle paths, and short block lengths consistent with City design standards. Policy CIRC-3.3 ensures that new residential and nonresidential development projects provide connections to the nearest bikeways, and Action CIRC-3.3.1 requires pedestrian and bicycle access to the citywide bikeway system every 500 feet, where feasible, as part of development.
project approval. Action CIRC-4.2.1 proposes to amend the Municipal Code to require new subdivisions and large-scale developments to include safe pedestrian walkways that provide direct links between streets and major destinations such as transit stops, schools, parks, shopping centers, and jobs, while Policy CIRC-5.3 mandates that new development support public transit. Action DT-3.2.1 proposes to amend the Municipal Code in order to establish a Downtown Retail Zone in North Downtown that requires development to incorporate retail or other uses that contribute to increased pedestrian activity on the ground floor and requires use permit approval for other ground-floor uses. In addition, Action OS-4.1.1 was revised during Council's review of the draft General Plan, and it now directs that either the BCAQMD or the City of Chico (emphasis added) will develop an air quality impact fee as one method to further mitigate air quality impacts. In other words, the City is committing itself to developing an air quality impact fee even if the BCAQMD does not. Finally, Action OS-4.1.2 states that during project and environmental review that air quality impacts will be evaluated and applicable mitigations to reduce impacts consistent with BCAQMD requirements will be incorporated. The incorporation of BCAQMD mitigations is the responsibility of the project applicant (i.e., "developer").

The commenter is also referred to Response 2a-3 above.
3.0 RESPONSES TO COMMENTS

Verbal Comment 2b

Luke Anderson: So, my comments are mostly about the Air Quality section. I appreciated the, how thorough, really, the analysis was of, you know, of really getting down to the pounds increase, and so thank you for that. So, surprise, surprise — the analysis would suggest that there’s a considerable impact associated with ozone and particulate pollution, which we are already out of compliance with at a state and federal level. So, that, that’s clear, and it’s clear that you know that there’s some difficulties with that, uh, if the goals and intentions of the sustainability part of the General Plan are actually going to be met. What I’m curious about is this final sentence, and after, I don’t know, 60 pages, I can’t remember how many pages there were in the Air Quality element, you have a final sentence here that says, after you’ve said that the contribution is considered cumulatively considerable, and thus a significant and unavoidable impact, the final sentence of this whole Air Quality thing says, “There are no feasible mitigation measures that can further offset air pollutant emissions from subsequent development and growth under the proposed General Plan Update”. I was kind of stunned to see that sentence as the summation, or you know, the final statement in this document, because that’s clearly an opinion that’s, you know, there’s been a lot of different perspectives going around about that. And to have that, what seems to be a political statement, or a statement of someone’s perspective of what’s feasible or not, I’m not sure if… Was that a technical thing that I’m missing here about how Environmental Impact Assessments are done, or was that just someone’s opinion, fed up with, with how impossible it is to do development and improve air quality. I don’t....

Vice: That’s the conclusion of the Draft EIR. Your comment, then, is perhaps, or now you’re trying to suggest that I believe that that statement is incorrect and I offer...

Luke Anderson: I mean, what even CEQA says that’s incorrect. It says if you can’t do onsite, adequate onsite mitigation, then there’s all these different offsite mitigations, and, and according to CEQA, there’s actually never a need for unavoidable impacts. You can always take as a project through to below the significance threshold using the various mitigation measures available.

Wolfe: I believe that perhaps, look, the point here is the term ‘feasible’, and, perhaps it is upon that that there would be disagreement, as to your point of view and the point of view of the EIR ultimately, so, so I would suggest that, so far as your comment is concerned, place it in that context.

Luke Anderson: So, in terms of...

Wolfe: So you would say, you would say for example, that you are not in agreement with the EIR’s conclusion; that you believe there are feasible alternatives; they include the following; could you please respond?

Luke Anderson: Well, but, I mean, that, that’s part of my comment. My comment is also, I’m just curious how, what’s the process whereby the final statement comes — it’s so loaded — that there are no feasible, I mean is there, I mean after pages and pages of, you know, detailed analysis of .325 increased pounds, you have a statement that isn’t backed up by any facts; it, it isn’t even backed up by an economic analysis.
Verbal Comment 2b Continued

*Vieg:* Okay, so I don’t know if you missed the beginning of the meeting, but we’re not here to discuss...

*Luke Anderson:* No, no, I’m talking about the Air...

*Vieg:* ...but we’re here to take comments, not engage in a dialogue...

*Luke Anderson:* Oh, well it seems you’ve been engaging all the way along, so...

*Vieg:* Well, we’re trying to be helpful; trying to help you frame that....

*Luke Anderson:* Okay, well, I’ll. I’ll be very clear, then. I think this is clearly a political end to the Air Quality Element of the Environmental Impact Report. It is contradictory to CEQA, which is, as I’m sure you’re very familiar with, and it would suggest that what is ‘feasible’ is some idea of economic analysis that hasn’t been articulated in this document; that may be based on the assumption that developers should not pay for full mitigation for new development, with respect to air quality; that instead, maybe the people who suffer from the consequences of air pollution should pay at Enloe, you know? But, otherwise, I appreciated the thoroughness. It’s just a shame that it was such a, such a changing end statement.

*Vieg:* Thank you.
3.0 RESPONSES TO COMMENTS

COMMENT 2B – LUKE ANDERSON, CHICO HEALTHY AIR ALLIANCE

Response 2b-1: The commenter repeats concerns he submitted in writing regarding no feasible air quality mitigation being a political opinion rather than scientific analysis (Response 2a-1). The commenter also notes that, according to CEQA, there is never a need for an unavoidable impact and states that impacts can always be taken to a level below the significance threshold through mitigation.

The commenter is referred to Responses 2a-1 through 2a-3.

Response 2b-2: The commenter repeats concerns he submitted in writing regarding developers paying for air impacts or whether the public will bear the costs via health burdens (Response 2a-4).

The commenter is referred to Responses 2a-1 through 2a-4.
3.0 RESPONSES TO COMMENTS

Letter 3a

From: "Stemen, Mark" <MStemen@csuchico.edu>

Hi Brendon,

I figured since it was a public meeting, that I could voice my comments to you.

Here are my written comments:

According to a fuel consumption analysis conducted for the proposed General Plan Update (Appendix F), the City of Chico consumed approximately 165,309 gallons of automotive fuel (diesel and gasoline) per day in 2008. As a consequence of the proposed General Plan Update policy provisions and the Land Use Diagram that result in the reduction of vehicle miles traveled per household (as compared to build-out under the 1994 General Plan), as well as the fuel efficiency requirements of AB 1493, automobile use in the City of Chico is projected to result in the consumption of 139,932 gallons of automotive fuel per day at build-out under the proposed General Plan Update. This is a reduction of 5,577 gallons of automotive fuel used per day over existing conditions (refer to Appendix F for detailed assumptions and modeling output files).

In addition, transportation fuel use would be reduced under build-out of the proposed General Plan Update as a result of implementation of AB 1493. Due to the fuel efficiency requirements of AB 1493, automobile use in the City of Chico is projected to result in a reduction of 5,577 gallons of automotive fuel used per day over existing conditions (refer to Appendix F for detailed assumptions and modeling output files).

Comment: The reduction in fuel use is being attributed to increased fuel efficiency. Is the City going to require everyone to buy a new car, or will this be voluntary? I ask, because there is no way to calculate the effect of increased fuel efficiency on the generation of climate gases, a point conceded in the footnote to table 4.14-1 which shows a 27% increase in the amount of fuel used.

Table 4.14-1

<table>
<thead>
<tr>
<th>Year</th>
<th>Fuel Use (gallons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2008</td>
<td>165,309</td>
</tr>
<tr>
<td>2030</td>
<td>139,932</td>
</tr>
</tbody>
</table>

In the footnote of a footnote I find this:

1 Year 2030 mobile source emissions estimates do not include mandated future passenger vehicle fuel economy improvements due to limitations in emissions modeling software (see AB 1493 discussion under the Regulatory Framework subsection above).

As noted in Section 3.0, Project Description, the City is developing a Climate Action Plan (CAP). The CAP will provide a strategy to ensure the City fulfills its commitment to the U.S. Conference of Mayors Climate Protection Agreement to reduce greenhouse gas emissions by 25 percent from 2005 levels by the year 2020. As of the preparation of this EIR, the CAP had not been completed, so no GHG reductions from implementation of the CAP are factored in this analysis.
Letter 3a Continued

Re: 2030 GP Draft EIR Comments

4.14/29

After 22 pages of measures:

Implementation of relevant policies and actions from the proposed General Plan Update and associated adoption and Implementation of the upcoming CAP could potentially mitigate GHG emissions projected for build-out conditions consistent with the City’s GHG reduction goal of 25 percent of 1990 levels by 2020 as well as state efforts to reduce GHG emissions. However, the CAP has not been fully developed at this time and its reduction measures are not currently known. Furthermore, while the proposed General Plan Update would improve GHG emission per service population, GHG calculations predict emissions in excess of the BAAQMD threshold and would still result in a net increase in GHG emissions. Thus, this impact is considered *cumulatively considerable* and *significant and unavoidable*. 4.14/92

Comment: Despite all “sustainability measures” in the plan, the EIR concedes the plan will not reduce GHGs, and in fact will increase them. How does this mesh with the goal of reducing GHGs?

Those are my main two comments. I will offer one more, as soon as I can get time to draft the comment. I will also be bringing the comment up at the next business from the floor.

Thanks and take care,

Mark
3.0 RESPONSES TO COMMENTS

COMMENT 3A – MARK STEMEN, CALIFORNIA STATE UNIVERSITY, CHICO

Response 3a-1: The commenter references pages 4.14-26 and -27 of the DEIR and notes that the reduction in fuel use discussed on these pages is being attributed to increased fuel efficiency. The commenter goes on to ask if the City is going to require everyone to buy a new car, noting that there is no way to calculate the effect of increased fuel efficiency on generation of climate change gases. The commenter points to the footnote for Table 4.14-1 of the DEIR, which shows a 27 percent increase in fuel consumption.

There are no proposed policy provisions contained within the General Plan Update that require everyone to buy a new car.

As stated on page 4.14-26 of the DEIR, while an increase in population as anticipated under the proposed General Plan Update would result in an increase in vehicle trips, these trips would be reduced in length due to the increased density proposed under the proposed General Plan Update, thus reducing the amount of automobile fuel consumed. In other words, placing homes, jobs, goods, and services in close proximity to each other would reduce the distance people would need to drive to go to work or to make purchases. According to a fuel consumption analysis conducted for the proposed General Plan Update, the City of Chico consumed approximately 165,509 gallons of automotive fuel (diesel and gasoline) per day in 2008. As a consequence of the proposed General Plan Update policy provisions and the Land Use Diagram that result in the reduction of vehicle miles traveled per household (as compared to build-out under the 1994 General Plan), as well as the fuel efficiency requirements of Assembly Bill (AB) 1493, automobile use in the City of Chico is projected to result in the consumption of 159,932 gallons of automotive fuel per day at build-out under the proposed General Plan Update. This amount equates to a reduction of 5,577 gallons of automotive fuel used per day over existing conditions.

Gallons of automotive fuel consumption were quantified using EMFAC2007, which provides fuel consumption projections according to the unique vehicle and speed composition of each county in California. The number of vehicles in each class is based on an analysis of Department of Motor Vehicles (DMV) registration data. These vary by calendar year and geographic area, so the makeup of the vehicle fleet is dependent on the calendar year and geographic area. The fuel consumption analysis provided under Impact 4.14.1 in the DEIR is based on detailed assumptions and modeling output files found in Appendix F of the DEIR.

While Impact 4.14.1 in the DEIR analyzes projected energy consumption, which encompasses automotive fuel use, Table 4.14-1, cited by the commenter, is actually located in the discussion analyzing Impact 4.14.2 of the DEIR. Impact 4.14.2 analyzes projected greenhouse gas (GHG) emissions under the proposed General Plan Update. Direct area source and mobile source GHG emissions were quantified using the URBEMIS model. Indirect emissions from electricity and natural gas demand and water conveyance were quantified in accordance with the methodology outlined in the California Air Pollution Control Officers Association’s CEQA...
3.0 RESPONSES TO COMMENTS

and Climate Change White Paper (2008). At the time of preparation of the DEIR and as stated under Table 4.14-1 on page 4.14-28, mandated future passenger vehicle fuel economy improvements instigated by AB 1493 could not be included due to limitations in mobile source emissions modeling software, unlike the modeling software used to quantify fuel consumption estimates under Impact 4.14.1 of the DEIR, which as discussed above, was able to be quantified accounting for the fuel efficiency requirements of AB 1493.

Therefore, while the fuel consumption analysis contained under Impact 4.14.1 in the DEIR identifies a reduction of 5,577 gallons of automotive fuel used per day in the year 2030 over existing conditions, Table 4.14-1 under Impact 4.14.2 of the DEIR identifies GHG emissions from automotive sources as increasing. Despite the limitations of mobile source emissions software at the time of DEIR preparation, the quantified greenhouse gas emissions are considered appropriate, as they demonstrate the most conservative estimates. As stated on page 4.14-28 of the DEIR, the actual GHG emissions resulting in 2030 will likely be much less than shown in Table 4.14-1.

Response 3a-2: The commenter references pages 4.14-29 and -52 of the DEIR and states that, despite 22 pages of sustainability measures, the DEIR concludes that the General Plan will not reduce GHGs but increase them. The commenter asks how this meshes with the goal of reducing GHGs.

The discussion under Impact 4.14.2 of the DEIR demonstrates a substantial effort to describe the lengths the City of Chico is undertaking to address impacts resulting from GHG emissions. As stated in Section 4.14 of the DEIR, the proposed General Plan Update seeks to reduce the environmental impact of land use development by limiting the amount of land consumed and increasing the viability of walking, biking, and transit by balancing growth and conservation through the reinforcement of the city’s compact urban form, establishing urban growth limits, and managing where and how growth and conservation will occur. These smart growth strategies have well-documented benefits in terms of lower GHG emissions due to fewer and shorter vehicle trips, since residents and employees of these areas have more home, work, and shopping opportunities within walking or biking distance.

Furthermore, Table 4.14-2 on pages 4.14-31 through -52 of the DEIR, in compliance with BCAQMD recommendations, summarizes the level of consistency of the General Plan Update policies and actions with the California Air Pollution Control Officers Association’s Model Policies for Greenhouse Gases in General Plans that were developed to assist local agencies in addressing climate change and greenhouse gas reduction measures in a manner consistent with state efforts. Overall consistency of the proposed General Plan Update policies and actions with the model policies is intended to be indicative of the proposed General Plan Update’s self-mitigating capabilities with respect to GHG emissions.

In addition, as noted on page 4.14-29 of the DEIR, the City is developing a Climate Action Plan (CAP). The CAP will provide a strategy to ensure the
City fulfills its commitment to the U.S. Conference of Mayors Climate Protection Agreement to reduce greenhouse gas emissions by 25 percent from 2005 levels by the year 2020. The CAP will include a summary of the recently conducted Community Greenhouse Gas Emissions Inventory as well as programs and actions to reduce greenhouse gas emissions in the energy, transportation, solid waste, water, and land use and development sectors that will help achieve Chico’s emissions reduction target. Completion of the CAP implements the policy direction of the proposed General Plan Update to reduce greenhouse gases (Policy SUS-6.1).

The proposed General Plan Update includes a number of policies and actions designed to reduce GHG emissions that are consistent with AB 32 and completion and implementation of the CAP by the City will provide for additional City activities designed to reduce GHG emissions. As of the preparation of this DEIR, a draft of the CAP had not been completed, so no GHG reductions from implementation of the CAP are yet factored.

Implementation of specific policies and actions from the upcoming CAP could potentially mitigate GHG emissions consistent with the City’s GHG reduction goal of 25 percent of 1990 levels by 2020 as well as state efforts to reduce GHG emissions. However, as the CAP has not been fully developed at this time and its reduction measures are not currently known, the DEIR cannot ensure its GHG mitigating qualities and therefore conservatively concludes that the impact is cumulatively considerable and significant and unavoidable.
3.0 RESPONSES TO COMMENTS

Verbal Comment 3b

Mark Stemen: Hi, guys. Mark Stemen, 1504 Salem. Okay, on just greenhouse gases, and the same type of thing. And, I mean, this is really kind of where the rubber hits the road when we get to the EIR. I poured through – it’s a lot of; that’s a lot of work, good job to you. The big thing in this is that we’re going to increase population by about 50,000, right? Is that what I’m understanding it to say? How many, what’s the population now to them, as I’m trying to read it?

Vieg: Again, it’s a buildout population. It’s not in a given year, but yeah, I think it’s 47 or something.

Mark Stemen: Okay, I’m looking, somewhere, I guess I got it, 51,000 people...

Vieg: Okay...

Mark Stemen: Anyway, but you get the gist – but at the same time, a decrease in greenhouse gases by 25 percent. So an increase in population of somewhere around 30 percent, 40 percent, decrease in greenhouse gases by 25 percent. It says it does it, but when you look in the EIR, it doesn’t appear that it’s true. I look at, and I just took notes here, so 4.14 on page 26, it says at the bottom, it says, you know there’s going to be an increase of kilowatt hours, there is going to be in efficiency, but at the very end, the last sentence is, “New development would be more energy efficient, but likelihood that more energy will be consumed over existing conditions”. But it says that it will be more energy to be consumed, but it will be much likely less than it, it would have been under ’94. If we could quantify that, I mean, because it basically, I’m getting the sense that it’s, there’s supposed to be a 750,000 kilowatt increase; it says it’s going to be less of an increase, but it’s still an increase. So, I don’t understand how we can increase energy and still decrease greenhouse gases.

The second one is on Transportation, and this one’s a little, I guess, more problematic. First of all, it says in 4.14-26 that we’re going to increase all of this population, we are actually going to increase the number of cars and the vehicle miles traveled, but we’re going to decrease the amount of gas we burn. And in 4.14-26, we were going to go from 165,000 gallons of fuel a day in 2008, to somehow, at the end of buildout, 160,000 gallons. And the way that we’re going to do this is then supposedly by existing getting better fuel economy and by changing the scope of the density of the town. And it refers to Appendix 4, Appendix E. But, again, somehow we’re going to actually increase the number of cars, increase the amount of distance they travel, but decrease the amount of gas burned in town.

Okay, so let’s go ahead, and so what they’re talking about, then, is Obama, and another point 4.14-13, they talk, or page 13, they talk about that we’re going to go, when an increase in California by 2010 or 2017 to 35 miles to the gallon over what it, whatever it is now. So 10, 20 percent increase in fuel efficiency, but a decrease in the amount of gas we burn, even though we’re going to burn more cars. So, we find that it prob... I don’t understand how they’re going to do this, right? You’re kind of shaking your head, too.

So now we go to Table 4 point, and this is the one you’re going to want to write down, Table 4.14-1. And when you look at it, it does say, then, “The amount of miles in gas traveled in 2008 mobile sources will be 484,358”. Twenty-thirty mobile sources will now constitute 618,000 – I mean, now all of a sudden we get the big, real number – but, there’s a footnote. So, in a footnote to a footnote in the Appendix, I find this: “Year 23 mobile source emissions estimates do not include a mandated future passenger vehicle economy improvements, due to limitations in emissions modeling software.” So, in other words, the software can’t lie, but somebody else is inserting it by hand. I
Verbal Comment 3b Continued

mean, how, if the modeling software is not giving you a number, where is the number coming from? So, that's something we can do. But, anyway, even when we get to the very end, it's -- that's problematic -- I don't know how this is going to do it. Maybe there's a -- I've read both reports. It's also interesting if you read the other report that's written by the guy who in Appendix B, they talk about how we're going to reduce vehicle miles traveled by living denser. Actually, the software, when they model it, came up with an answer they didn't expect. It's not actually true, because as we get denser, we actually then restrict the number of opportunities for people to be able to get what they need from where they are. It doesn't appear that the research for the EIR, and the EIR, is supporting the claim that everyone keeps making -- that we are going to reduce greenhouse gases in this Plan.

And I don't even have to make it up myself. The very last thing, after 22 pages of measures on all of this stuff, we get to the very end, and it talks about the implementation of umbrella policies of the proposed General Plan, and at the end, will still result in a net increase in greenhouse gas emissions. So, it appears to me, on page 4.14-52, that this Plan does admit that there was going to actually be an increase, not anywhere close to a decrease, in greenhouse gases.

So, if you can all figure all that stuff out and bring it back to the Council, because then, I think, if that's true, we'll have a whole different discussion going on. So, thanks, and I hope I didn't put too much work on you. So, alright, take care, thank you.
3.0 RESPONSES TO COMMENTS

**COMMENT 3B – MARK STEMEN, CALIFORNIA STATE UNIVERSITY, CHICO (VERBAL)**

Response 3b-1: The commenter references page 4.14-26 of the DEIR and expresses concerns that the DEIR does not quantify how much more energy would be consumed under the proposed General Plan Update versus the 1994 General Plan. The commenter questions how energy use can be increased and GHGs decreased at the same time.

The DEIR quantifies how much more energy would be consumed under the proposed General Plan Update in the year 2030 as compared to baseline year 2008 conditions. Regarding the projected decrease of energy use and increase of GHG emissions, the commenter is referred to Response 3a-1 for a comparison of energy consumption modeling software and mobile source GHG emissions utilized at the time of DEIR preparation.

Response 3b-2: The commenter repeats concerns he submitted in writing regarding increased fuel efficiency and the generation of GHGs (Response 3a-1). The commenter also questions how the City will increase the number of cars and the distance those cars travel and yet reduce the overall amount of fuel burned.

The commenter is referred to Response 3a-1. In addition, as a point of clarification, as stated on page 4.14-26 of the DEIR, while an increase in population as anticipated under the proposed General Plan Update would result in an increase in vehicle trips, these trips would be reduced in length [italicized for emphasis] due to the increased density proposed under the General Plan Update.

Response 3b-3: The commenter repeats concerns he submitted in writing regarding the footnote for Table 4.14-1 of the DEIR. The commenter asks if the modeling software is not providing the number [for increased fuel efficiency] and asks where it is coming from. The commenter also references Appendix B and notes that as people live denser they reduce opportunities to be able to get what they need from where they are. The commenter concludes that the research in the DEIR does not seem to support the claim that everyone is making that the General Plan Update will reduce GHGs.

The commenter is referred to Response 3a-1 for clarification of the footnote of Table 4.14-1 under Impact 4.14-2 of the DEIR and that it does not apply to the fuel consumption analysis discussed under Impact 4.14-1. The commenter’s opinion, unsupported by any provided evidence, that higher-density growth patterns will “actually then restrict the number of opportunities for people to be able to get what they need from where they are” is not true. According to the Technical Memorandum prepared by Fehr & Peers for the DEIR (see Appendix B of the DEIR), vehicle travel is influenced by the relation of four factors to each other: population density, jobs to housing balance, alternative transportation network quality, and accessibility by all modes of transport to regional activity (e.g., jobs and retail) centers, not simply one factor as the commenter suggests.
For example, if a future Chico neighborhood is 20 percent denser, 15 percent more diverse, has a 10 percent better pedestrian design index, but has access to 20 percent fewer regional destinations than an average existing Chico neighborhood, the study neighborhood could be expected to generate 1.5 percent fewer vehicle trips due to all of these factors: $(20\% \cdot -0.043 + 15\% \cdot -0.051 + 10\% \cdot 0.031 + (-20\%) \cdot -0.036 = -1.5\%)$.

The intent of the proposed General Plan Update is to accommodate anticipated growth through compact, infill, and mixed-use development, as well as focusing intensified redevelopment along transit corridors and at other key locations, to confine growth to the immediate Chico area. These development patterns will result in reductions in vehicle miles travelled in Chico and are consistent with the results of similar efforts conducted in other parts of California, specifically the Sacramento Regional Blueprint planning process and the blueprint planning in the San Joaquin Valley and San Luis Obispo area.

**Response 3b-4:** The commenter repeats a comment he submitted in writing that page 4.14-52 of the DEIR admits that the General Plan Update will not reduce GHGs but increase them (Response 3a-2). The commenter states that the City should figure the “stuff” out and bring it back to Council.

The commenter is referred to Response 3a-2.
Verbal Comment 4

Robin Huffman: Good evening, I’m Robin Huffman, and I’m with Butte Environmental Council, as I believe you know. I’m primarily looking this evening, and commenting on, the Water portion of this environmental document. And I’ve, we will, of course, be submitting comments, but I just wanted to come here tonight to maybe ask you about certain things. The Section 4.9 Hydrology and Water Quality points out the groundwater basins, and groundwater bearing zones, and groundwater supply, and yet I’m not seeing anything in here that is saying where the water for the future developments are going to come from. Because, there is planning already, a request from Cal Water, to pipeline the Table A allocation, so it would seem like that might be mentioned. It’s not mentioned, is it? Did I miss it?

Vigg: I don’t recall, offhand, so...

Robin Huffman: So, I mean, that would be part of the quantity that would be required for this buildout of 40,000 new Chico residents by 2030. So, significant and unavoidable impacts for an estimated 40,000 new Chico residents by 2030 does include Air Quality, Noise, Traffic and Circulation, Visual Resources and Aesthetics, but doesn’t include Water in significant and unavoidable impacts, certainly there’s going to be an impact on the groundwater, and I would think it would be significant, with 40,000 new residents.

So, there are also ways to avoid that impact, but the analysis is just absolutely missing. You know I’ve been, I’m really surprised about this, I’ve been really focused on Butte County’s General Plan EIR recently, and I would’ve thought I would have found a better analysis, but both failed to adequately analyze the impact on water resources. So, it’s a very important consideration, required under CEQA, to do the cumulative impact analysis in the General Plan Update, even though it’s
Verbal Comment 4 Continued

programmatic, even though you'll be doing project-level EIRs for the Special Planning Areas, this General Plan needs to have a cumulative analysis of water resources for these, for the potential buildout, as well as the probable buildout.

Some studies are somewhat vaguely referred to in this Section 4.9. When you're using some report for data for an analysis where you've drawn a conclusion, such as the groundwater's fine, it's not in a state of decline, you need to back that up with what report you've been reading to draw that conclusion. So, give us a reference, those water studies must be easily accessible to the general public for evaluating the EIR. Could be there's a problem that Cal Water's a private water company, I don't know, and they don't have to tell us everything that's going on, but you do have three sources besides Cal Water. You've got Butte County Department of Water and Resource Conservation, you've also got DWR, and there are other agencies that have information on groundwater and surface water and such. So, please reference them in the Final EIR. And I would like to have access to them, in the meantime.

What I've heard from Cal Water when I went through their water tour recently, is that the water table is, in fact, taxed, and it's in a state of decline. So, that, which I heard directly from the director, is contrary to, you know, the scenario in your report that everything's fine. So, it really makes me wonder.

So, there's good reason to cross check reports with your, with other sources, and do a scientific analysis. Also, consider when those reports were written; you know, how much growth has occurred since 2001 report or 2005 report. In 2005, Tocay Dudley of Cal... Butte County Department of Water and Resource Conservation, the head of the department at the time, was stating that wells in the Chico Urban Area show decline of something like one to three feet annually.

Additional maps could be helpful. You've referenced, regarding water quality, the toxic plumes. It would be nice to see a map of the plumes, as well as the information you did reference.

The recharge zones, you know, every place is a recharge zone, but certain areas are more valuable as recharge zones, and so it'd be nice to see that there, too. And there may be other, others that are appropriate.

The Foothills Inventory Unit and the Mountain Inventory Unit are referred to, for example, but there's not a map of those inventory units, so it'd be nice to see where they are. For example, do they flow through Special Planning Areas?

I don't understand the sentence in the fourth bullet on page 4.9-10. If you'd please look at that sentence. It starts, "Under drought conditions..." It just doesn't make sense. Do you want me to read it? I don't know if we can figure it out here tonight.

[inaudible]

And, let's see – not too many more things. I'm glad I have a little bit more than three minutes, because that's never enough.

On page 4.9-39, it does talk about land uses and growth, and it contributed to cumulative water

4-3
4-4
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4-10
Verbal Comment 4 Continued

quality changes, and yet there’s nothing throughout the rest of this section that talks about quantity.

The other thing is connecting with geologies and soils, page, Figure 4.8-2 Chico Urban Area Nitrate Compliance Program. This shows proposed areas to convert to sewer, and it shows large, large sections of residential areas that will need to be incorporated into the, or that are proposed to be converted to sewer and currently are on groundwater. So, this too would impact the water quantity.

I mean, the way that the sewer works is that the used water, contaminated water, then is piped to the sewer treatment plant, treated, and then sent down the Sacramento, right? So, now you’re going to have a lot more water that will then be exported out that currently is actually more or less recharging, even though it’s not treated. So, that, what’s the impact of that? I think that’s significant enough that these, these huge housing developments are on East Lassen – if, when that happens – during this General Plan, I think it should be part of the water analysis.

And, fire flows. The cumulative effect of providing water for adequate fire flow in the expansive SPAs, Special Planning Areas, should be considered in the overall water analysis as well, and gauged in the cumulative effects.

So, that’s all I have on water this evening.

Viag: Thank you. And, did you want to read bullet 4?

Robin Huffman: Sure.

Viag: I have it here.

Robin Huffman: Okay, it’s kind of the last sentence, last line there, but I’ll read the whole thing. “Under drought conditions evaluated in the Butte County Water Inventory and Analysis, current demand can generally be met through increased groundwater extraction, provided groundwater extractions are increased to offset reduced surface supplies.” It just doesn’t make sense at all.

Viag: Okay, thanks.

Angell: Just to mention, Section 4.12 contains a discussion of water supply. It actually starts on page 4.12-34. There’s cross reference between Sections 4.9 and 4.12.

Robin Huffman: Oh, okay. Okay, 4.12-34, is that, is that what you said?

Angell: Yes.

Robin Huffman: Oh, good. Okay, I will further study this.

Viag: Thanks.
3.0 RESPONSES TO COMMENTS

COMMENT 4 – ROBIN HUFFMAN, BUTTE ENVIRONMENTAL COUNCIL (VERBAL)

Response 4-1: The commenter states that Section 4.9, Hydrology and Water Quality, of the DEIR discusses groundwater basins, groundwater bearing zones, and groundwater supply but does not say anything about where water for future development will come from. The commenter also states that there is a request from Cal Water to pipeline the Table A allocation and that information should be mentioned.

Regarding the commenter’s inquiry on the status of the Butte County’s Table A allocation, Cal Water has stated that they are committed to working with Butte County and conducting a study on the feasibility of transporting the County’s Table A allocation to serve Cal Water’s Chico area. It is anticipated that this feasibility study will be initiated within the next year. (Personnel communication, Mike Pembroke, District Manager, California Water Services Company, December 17, 2010). It should be noted that if the Table A allocation can be transported to the Chico area and used by Cal Water to meet the community’s water needs, that it would significantly reduce Cal Water’s reliance on groundwater resources to meet the service area’s needs.

Water supply and the associated environmental effects are discussed in Section 4.12.4, Water Supply and Service, of the DEIR. As stated on pages 4.12-34 and -35, water service in the Planning Area is provided by Cal Water’s Chico-Hamilton City District (Chico District), which serves the City of Chico, Hamilton City, and the surrounding areas in unincorporated Butte County. The sole source of water supply for the customers of the Chico District is groundwater extracted from subbasins of the Sacramento Valley Groundwater Basin, including the Vina Subbasin, the West Butte Subbasin, and the East Butte Subbasin. Although the Sacramento Valley Groundwater Basin is currently unadjudicated and no safe yield has been determined, historical data indicates that water level decreases in the groundwater basin are seasonal and that the groundwater basin typically recharges during the winter months. Therefore, although long-term historical data shows that well levels seasonally and annually fluctuate, there is no significant difference in the well levels over the long term (page 4.12-35 of the DEIR).

As discussed under Impact 4.12.4.1 of the DEIR, while it is estimated that an additional 16,376 dwelling units will be needed in the City of Chico by the year 2030 based primarily on the city’s historic 2 percent growth rate, which has been relatively stable over the last 40 years. This assumption is consistent with the Butte County Association of Government (BCAG) projections and Regional Housing Need Plan (RNHA) allocation, as well as the California Department of Finance (DOF) estimates. This growth would increase demand for water supply and thus require increased groundwater production. The growth rates that CalWater used for its water projections in its California Water Service Company 2007 Urban Water Management Plan, Chico-Hamilton District (2007 UWMP) are consistent with Chico’s anticipated 2 percent growth rate. The projected water service connections identified in the 2007 UWMP are based on an overall short-term (five-year) annual average growth rate of 2.49 percent.
and an overall long-term (ten-year) annual average growth rate of 2.32 percent. The Chico District’s five-year average growth pattern was combined with the ten-year average demand per service for each customer class to project the most probable demand values through the year 2030. Because the growth rates that CalWater used for its water projections in its UWMP are consistent with the General Plan’s expected 2 percent annual growth through 2030, it is anticipated that water supplies would be adequate to serve the city.

The DEIR also notes, on page 4.12-50, full buildout of the 2030 General Plan Land Use Diagram would result in an increase of 21,495 housing units and 51,588 persons in the SOI, for a total of 62,933 housing units and a population of 151,039. At build-out of the proposed General Plan Update, water supply would continue to be provided by Cal Water. The 2007 UWMP identifies per capita water demand for residential uses in the Chico District as 186.5 gallons per day (gpd) per person. Applying those factors to the growth anticipated as a result of the proposed General Plan Update would equate to an increase in water demand of 9,621,162 gallons per day (gpd) over baseline conditions (51,588 additional persons x 186.5 gpd per person). Additional water supply would be necessary to serve nonresidential customers as well; however, the exact number and specific type of nonresidential connections cannot be determined until specific development projects are proposed. Water projections beyond 2030 are not currently available; however, it is possible that buildout of the General Plan Update would require additional groundwater beyond that discussed in the 2007 UWMP given that proposed General Plan Update growth capacity exceeds the city’s anticipated needs for year 2030.

After discussing the environmental effects associated with increased groundwater production, secondary water supply opportunities, and Cal Water’s conservation policies and programs, the DEIR goes on to explain that both well level records and the historical climatic record show that water supply demand for Chico can be met by the existing supply and that policies in the proposed General Plan Update provide for continued regular evaluation of groundwater levels and availability in coordination with Cal Water and build-out of the proposed General Plan Update would preserve significant groundwater recharge areas and would result in increased water use efficiency. The DEIR concludes that this impact is considered less than significant.

As stated throughout Section 4.12.4 of the DEIR, the Sacramento Valley Groundwater Basin is currently unadjudicated and no safe yield has been determined, extensive research and data strongly suggests that the subbasins underlying Chico are healthy and subject to seasonal declines that eventually rebound.

For example, the Butte County Groundwater Inventory Analysis, conducted in 2005 as a cooperative study between the Butte County Water Resources and Conservation Department, the consultant to Butte County - Camp Dresser & McKee, Inc., and the Department of Water and Resources, Northern District, provides a detailed discussion of the groundwater resources and the distribution, depth, and yield of the
existing County wells at the subregional and local levels. The Inventory Analysis includes the California Water Service Sub-inventory Unit, which covers an area of about 15,400 acres in the greater Chico urban area and is split between the Vina and West Butte inventory units. Long-term changes in groundwater levels in the California Water Service Sub-inventory Unit were determined through evaluation of 45 wells, for which groundwater level measurements date back to 1978. Using the 1978 to 2000 data, hydrographs were developed and a trend line through the groundwater measurements was calculated. The slope of the trend line illustrates the average changes in groundwater levels per well over the 20-year period. The results of the groundwater level trend line analysis varied significantly from well to well. However, overall analysis indicates that groundwater levels in the California Water Service Sub-inventory Unit have declined an average of 12 feet between 1978 and 2000 with most of the decline occurring during the 1987-1994 drought. An analysis of the hydrograph data also indicates that groundwater levels in the wells have stabilized since recovery from the early 1990s drought (DWR, 2005, p. 3-37).

According to the Inventory Analysis, although the long-term trend of groundwater levels shows a decline in the California Water Service Sub-inventory Unit, it does not necessarily mean that groundwater levels will continue to decline into the future. In municipal service areas, it is typical for groundwater levels to experience an initial drop as the demand increases or drought conditions occur. After the initial decline, groundwater levels will commonly reach a new equilibrium with the existing production demand, thereby limiting further declines in groundwater levels. This is evidenced by the fact that while the basin declined an average of only 12 feet between 1978 and 2000, the City of Chico almost tripled in size during that same time period from a population of 26,000 persons in 1978 to 60,516 persons in 2000 (DOF, Report 84 E-4). The Inventory Analysis recommends continued monitoring and evaluation of the municipal production wells, along with increased monitoring of dedicated monitoring wells in the California Water Service Sub-inventory Unit, to help properly evaluate and manage future groundwater resources in the area. The proposed General Plan Update requires the City to comply with this recommendation via policies that require the City to support Cal Water's periodic evaluation of groundwater availability using the Butte Basin Groundwater Model and their work to establish a water supply budget with specific measures to assure sustainable levels of groundwater (PPFS-5.1.1). This policy provides for continued regular evaluation of groundwater levels and availability.

Therefore, while it is true that the overall groundwater level in the aquifer may be in decline at any one given point in time, or even over the course of several drought years, taking these “snapshots” in time does not necessarily provide an accurate picture of the overall health of the aquifer. On December 17, 2010, Cal Water confirmed to the City of Chico that water levels have declined but clarified that the aquifer “seems to rebound and recover” and that the declines are “reasonable” in light of rainfall in the area. According to Cal Water, the groundwater basin underlying Chico is “currently healthy” and is not in overdraft or a critically declining state. (Personnel communication, Mike Pembroke, District Manager, California Water Services Company, December 17, 2010).
It should also be noted that Cal Water is currently developing a conservation program intended to achieve a 20 percent reduction in per capita water use by year 2020 consistent with the Governor's 20X2020 Program as discussed on page 4.12-44 of the DEIR. Cal Water expects to double its annual conservation program expenditures in order to meet 20 percent reduction in per capita use. Recently adopted state policies requiring future reductions in per capita urban water use are providing much of the impetus for this effort. This primarily includes the passage of Senate Bill X7-7 in November 2009, which mandated a statewide 20 percent reduction in per capita urban water use by 2020, but also recent decisions by the California Public Utilities Commission (CPUC) directing Class A and B water utilities to adopt conservation programs and rate structures designed to achieve reductions on per capita water use.

For the Chico District, the 2015 and 2020 gallons per capita per day (gpcd) targets are set at 90 percent and 80 percent of baseline water use, respectively. Baseline water use is the average water use for any continuous 10-year period ending between 2004 and 2010. For the Chico District the 10-year base period of 1999-2008 was selected which yielded a baseline water use of 286 gpcd. This baseline water use yields a 2015 target of 257 gpcd and a 2020 target of 228 gpcd. Based on population projections, achieving the 2020 target gpcd of 228 would project to a 2020 demand that is roughly flat when compared to current demand (Ken Jenkins, Conservation Director, California Water Service Company. December 29, 2010). In other words, despite growth in population, Cal Water is expecting water demand to remain the same for the Chico area through the year 2020.

Response 4-2: The commenter lists the significant and unavoidable environmental issues identified in the DEIR and notes that water is not included. The commenter states that there will be an impact on groundwater and that it could be significant with 40,000 new residents.

The commenter is referred to Response 4-1.

Response 4-3: The commenter states that the analysis of impacts to water resources is completely missing. The commenter states that CEQA requires a cumulative impact analysis for the General Plan Update even though it's programmatic and even though project-level analysis will be completed for the Special Planning Areas. The commenter states that the DEIR needs to have a cumulative analysis of water resources for the potential and probable build-out.

The discussion regarding Water Supply and Service is located in Section 4.12.4 of the DEIR, on pages 4.12-34 through 4.12-56. Cumulative water supply impacts are analyzed under Impact 4.12.4.3 on pages 4.12-55 and 4.12-56 of the DEIR.

Response 4-4: The commenter states that citations to the data relied on are needed to back up conclusions in the DEIR, such as the conclusion that the groundwater is fine. The commenter requests that all information be referenced in the FEIR and easily accessible to the public.
The commenter is referred to Response 4-1. In addition to the references discussed in Response 4-1, the references cited in the DEIR water supply discussion are listed on pages 4.12-102 through 4.12-105 of the DEIR. These include the Butte County Department of Water and Resource Conservation website, the Butte County Department of Water and Resource Conservation’s Basin Management Objective, Butte County, Sub-Inventory Unit – Chico Urban Area, the California Department of Water Resources’ website and Integrated Water Management Plan, the California Urban Water Conservation Council’s website, the Cal Water Urban Water Management Plan, the Butte County Groundwater Management Plan, the Integrated Water Resources Plan, Butte County Department of Water and Resource Conservation, and personal communications with Cal Water staff.

Response 4-5: The commenter states that she has heard from Cal Water that the water table istaxed and in a state of decline. As such, the commenter believes that everything she has heard from the director of Cal Water is contrary to what is in the DEIR.

The commenter is referred to Response 4-1.

Response 4-6: The commenter states that there is good reason to cross-check reports with other sources and do a scientific analysis. The commenter also notes that the DEIR should consider when the reports were written. The commenter states that in 2005 the head of the Butte County Department of Water and Resource Conservation said wells in the Chico Urban Area showed decline of approximately 1 to 3 feet per year.

The commenter is referred to Response 4-1.

Response 4-7: The commenter states that additional maps would be helpful, including maps of the toxic plumes. The commenter also requests references for the toxic flume information.

Table 4.9-1 of the DEIR includes descriptions of the general locations of toxic plumes in the city. As shown at the bottom of the table and in the References section on page 4.9-42, the source of the information is the California Department of Toxic Substances Control website.

Response 4-8: The commenter states that recharge areas should be discussed; for example, the commenter states that the Foothill Inventory Unit and Mountain Inventory Unit are discussed but not shown on a map. The commenter asks if the units flow through the Special Planning Areas.

Page 4.9-11 of the DEIR states that the low foothill area east of the city is the primary aquifer recharge area for Chico’s domestic groundwater. Further, since the General Plan Update was initially circulated in the March 2010, a new action has been added to the policy document that directs the City to work with local, state, and regional agencies to identify and map groundwater recharge areas within the Sphere of Influence.
As stated on page 4.9-10 of the DEIR, the Foothill and Mountain Inventory Units are water units created for the analysis of water supplies and groundwater conditions contained in the Butte County Water Inventory and Analysis, March 2001.

Response 4-9: The commenter states that she does not understand the sentence in the fourth bullet on page 4.9-10.

The fourth bullet on page 4.9-10 indicates that during drought conditions, Butte County's water supply demand can be met by increased groundwater pumping. The increased groundwater pumping would need to offset drought-related reductions in surface water supply.

Response 4-10: The commenter states that page 4.9-39 talks about land use and growth contributing to cumulative water quality changes but that nothing regarding quantity is discussed.

The commenter is referred to Response 4-3.

Response 4-11: The commenter states that the Chico Urban Area Nitrate Compliance Program should be part of the water analysis. The commenter states that large residential areas that are currently recharging groundwater via untreated wastewater will be exporting that water to the wastewater treatment plant. The commenter asks what the impact of that is.

As stated on page 4.8-9 of the DEIR, the discharge from individual septic systems has been cited by the Regional Water Quality Control Board (RWQCB) as a source of soil and groundwater nitrate contamination in the Planning Area. Methemoglobinemia (blue-baby syndrome), possible carcinogenic effects, and other health concerns are among the effects of excessive nitrate exposure, particularly in drinking water. Technical analysis conducted for the County’s Nitrate Compliance found that average residential densities of approximately four or more dwelling units per acre in certain parts of the Planning Area exceed the capacity of the soil and receiving waters to assimilate nitrogen. Given these health risks and the contamination of groundwater, it is considered undesirable for untreated septic system discharge to recharge groundwater.

The shared City/County responsibility to transfer specific areas of the Chico community from septic systems to the City’s sewer system is directed by a State decree to address groundwater quality considerations. The septic systems that will be decommissioned are not considered recharge areas for the aquifer that Cal Water relies upon to provide water for the Chico community. The key recharge areas for the aquifer that Cal Water relies upon to meet its water demands are located in the foothills east of Chico.

Response 4-12: The commenter states that the cumulative effect of providing adequate fire flows to the Special Planning Areas should be considered in the overall water analysis.
Impacts associated with adequate fire flow are analyzed under Impact 4.12.1.2 on page 4.12-13 of the DEIR. As discussed in the DEIR, project level CEQA review of future improvements necessary for fire flows would identify and mitigate any significant environmental impacts, including cumulative impacts.

Response 4-13: The commenter reads the earlier referenced fourth bullet on page 4.9-10 and states that it does not make sense at all.

The commenter is referred to Response 4-9.

Response 4-14: After being informed that water supply is discussed in Section 4.12 of the DEIR, the commenter states that she will study it further.

This comment is noted.
4.0 ERRATA
4.1 INTRODUCTION

This section includes minor edits to the DEIR. Changes to the DEIR text are shown in Table 4.0-1 below. Edits to DEIR tables and figures are listed in Section 4.3 below. These modifications resulted from responses to comments received during the Draft EIR public review period. Changes to the proposed General Plan since public release of the DEIR, and thus associated changes to those policies listed in the DEIR, appear in Section 5.0, Minor Revisions to the Proposal General Plan.

Revisions herein do not result in new significant environmental impacts and do not constitute significant new information, nor do they alter the conclusions of the environmental analysis. Changes are provided in revision marks (underline for new text and strikeout for deleted text).

4.2 MINOR CHANGES AND EDITS TO THE DEIR TEXT

<table>
<thead>
<tr>
<th>Comment Response</th>
<th>DEIR Page #</th>
<th>DEIR Page Location</th>
<th>Edits</th>
</tr>
</thead>
<tbody>
<tr>
<td>E-4</td>
<td>3.0-28</td>
<td>First paragraph under Relationship to LAFCo Policy heading</td>
<td>There is an additional agency that has influence on the City’s ability to implement the proposed General Plan Update, in particular the proposed Land Use Diagram. The Butte Local Agency Formation Commission (LAFCo) reviews and evaluates all proposals for the formation of special districts, incorporation of cities, annexation to special districts or cities, sphere of influence updates and amendments for special districts or cities, and consolidation or merger of districts with cities.</td>
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<tr>
<td>E-6</td>
<td>4.0-5</td>
<td>Local Adopted General Plans bullet</td>
<td>Local Adopted General Plans. These are the existing land use plans in the region, consisting of the cities of Biggs, Gridley, and Oroville, the Town of Paradise, and Butte County. It should be noted that Butte County is currently in the process of updating its general plan (public draft released in 2009), which includes land use planning for some areas that are also addressed in the City of Chico’s proposed General Plan Update. This Draft EIR cumulative setting and impact analysis acknowledges the Butte County general plan update process. [It should be noted that, since the release of the NOP and the commencement of the environmental analysis for this DEIR, Butte County adopted the Butte County General Plan 2030 on October 26, 2010.]</td>
</tr>
<tr>
<td>E-8</td>
<td>4.1-4</td>
<td>Last paragraph</td>
<td>While the two General Plan Updates (Butte County and City of Chico) have overlapping Planning Area boundaries, Butte County will have formal authority and jurisdiction over the land outside of the city boundaries unless a formal agreement is otherwise established. [It should be noted that, since the release of the NOP and the commencement of the environmental analysis for this DEIR, Butte County adopted the Butte County General Plan 2030 on October 26, 2010.]</td>
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<tr>
<td>E-10</td>
<td>4.1-7</td>
<td>Fourth paragraph</td>
<td>At the time of the preparation of the Chapman-Mulberry Neighborhood Plan, the area contained approximately 800 dwelling units and had a population of approximately 2,100. The Chapman-Mulberry area is nearly fully developed with the large majority (73 percent) of the housing stock within the plan area being constructed prior to 1950. The plan area is lacking in infrastructure including...</td>
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<td>Comment Response</td>
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<tr>
<td>E-11</td>
<td>4.1-9</td>
<td>Under Butte Local Agency Formation Commission (Butte LAFCo) subsection</td>
<td>Butte LAFCo promotes efficient governmental organization and service delivery while protecting agricultural and open space lands, approves changes to local governmental boundaries (incorporations, annexations, etc.), and prepares spheres of influence designating the logical physical boundary and service areas for each city and special district. Butte LAFCo is composed of two members from the Butte County Board of Supervisors, two members from city councils of cities within the County, two members representing special districts in the County, and one public member. Under the Cortese-Knox Hertzberg Local Government Reorganization Act of 2000 (Government Code Section 56000, et seq.), Butte LAFCo is the agency responsible for coordinating, directing, and overseeing logical and timely changes to local governmental boundaries, incorporation of cities, reorganizations, and the formation of special districts.</td>
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<td>Additional text at top of page before Agricultural Land Conservation subsection</td>
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<tr>
<td>E-14</td>
<td>4.2-10</td>
<td>Butte County Local Agency Formation Commission (LAFCo) Definition of Prime Agricultural Land</td>
<td>The Butte County Local Agency Formation Commission (LAFCo) defines prime agricultural land differently from the FMMP definitions. LAFCo defines prime agricultural land according to Section 56064 of the California Government Code, which defines prime agricultural land as an area of land, whether a single parcel or contiguous parcels, which has not been developed for a use other than agricultural use and which meets any of the following qualifications:</td>
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<tr>
<td></td>
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<td>1. Land which qualifies for rating as class I or class II in the USDA NRSC land use capability classification, whether or not land is actually irrigated, provided that irrigation is feasible.</td>
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<td>2. Land which qualifies for rating 80 through 100 Storie Index Rating.</td>
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<td>3. Land which supports livestock used for the production of food and fiber and which has an annual carrying capacity equivalent to at least one animal unit per acre as defined by the USDA in the National Handbook on Range and Related Grazing Lands, July 1967, developed pursuant to Public Law 46, December 1935.</td>
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<td>4. Land planted with fruit or nonbearing trees, vines, bushes, or crops which have a nonbearing period of less than five years and which will return during the commercial bearing period on an annual basis from the production of unprocessed agricultural plant production not less than four hundred dollars ($400) per acre.</td>
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<td>5. Land which has returned from the production of unprocessed agricultural plant products an annual gross value of not less than four hundred dollars ($400) per acre for three of the previous five calendar years.</td>
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<td></td>
<td>According to 2002 NRCS SSURGO soils metadata, there are no lands</td>
<td></td>
</tr>
</tbody>
</table>
in the Chico Planning Area that meet the 80 through 100 Storie Index Rating criteria (#2 above) for LAFCo prime agricultural land. However, two of the most prominent soils in the Planning Area — Bosquejo clay and Almendra loam — are considered prime agricultural land if irrigated under criteria #1 above. Several of the other, less prominent, soils in the Planning Area are also considered prime agricultural land (NRCS, 2006).

Butte County participates in the Williamson Act program (described further below). As of 2007, there were 215,882 acres of land in Butte County under Williamson Act contracts (DOC, 2009). An extension of the Williamson Act, called the Farmland Security Zone (FSZ) Program, permits farmers and ranchers to garner an additional 35 percent property tax reduction by keeping their land in agriculture for a minimal initial term of 20 years; however, the FSZ program has not been adopted by Butte County. There are no Williamson Act contracts within the existing city limits, the existing SOI, or the proposed SOI of Chico. **Figure 4.2-2** shows lands in the Planning Area under Williamson Act contracts. Approximately 25,651 acres of land in the Planning Area are under agricultural preservation contracts. Most of this land is located around the western edge of the Planning Area.

**Butte County Local Agency Formation Commission (LAFCo)**

Butte County LAFCo is a regulatory agency with countywide jurisdiction, established by state law to encourage and provide for a planned, well-ordered, efficient urban development pattern which discourages urban sprawl, preserves open space and prime agricultural lands, provides housing for persons and families of all incomes, and addresses the efficient extension of government services. Butte County LAFCo must consider the effect that any proposal will produce on existing agricultural lands. By guiding development toward vacant urban land and away from agricultural preserves, LAFCo assists with the preservation of valuable agricultural resources in Butte County. Butte County LAFCo has adopted the following policies regarding the protection and conversion of agricultural resources:

- **2.13 Agricultural and Open Space Land Conservation**
- **2.13.1 Conditions for Approval of Prime Agricultural/Open Space Land Conversion**
- **2.13.2 Approved Sphere of Influence Plan Required**
- **2.13.3 Finding with Respect to Alternative Sites**
- **2.13.4 Determining Impact to Adjacent Agricultural/Open Space Lands**
- **2.13.5 Comment on Prime Agricultural/Open Space Projects and Chico Urban Area “Green Line” Policy**

The Butte County Environmental Health Division of the Butte County Public Health Department is the CUPA for Butte County. CalEPA periodically evaluates the ability of each CUPA to carry out the requirements of the Unified Program. A program evaluation of Butte County is currently underway.

<table>
<thead>
<tr>
<th>Comment</th>
<th>DEIR Page #</th>
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<th>Edits</th>
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</thead>
<tbody>
<tr>
<td>E-15</td>
<td>4.2-10</td>
<td>Second to last paragraph</td>
<td>Butte County participates in the Williamson Act program (described further below). As of 2007, there were 215,882 acres of land in Butte County under Williamson Act contracts (DOC, 2009). An extension of the Williamson Act, called the Farmland Security Zone (FSZ) Program, permits farmers and ranchers to garner an additional 35 percent property tax reduction by keeping their land in agriculture for a minimal initial term of 20 years; however, the FSZ program has not been adopted by Butte County. There are no Williamson Act contracts within the existing city limits, the existing SOI, or the proposed SOI of Chico. <strong>Figure 4.2-2</strong> shows lands in the Planning Area under Williamson Act contracts. Approximately 25,651 acres of land in the Planning Area are under agricultural preservation contracts. Most of this land is located around the western edge of the Planning Area.</td>
</tr>
<tr>
<td>E-16</td>
<td>4.2-11</td>
<td>Legend in Figure 4.2-2</td>
<td>Williamson Act – Prime Agricultural Land</td>
</tr>
<tr>
<td>E-17</td>
<td>4.2-15</td>
<td>Additional text under the Local heading</td>
<td><strong>Butte County Local Agency Formation Commission (LAFCo)</strong> Butte County LAFCo is a regulatory agency with countywide jurisdiction, established by state law to encourage and provide for a planned, well-ordered, efficient urban development pattern which discourages urban sprawl, preserves open space and prime agricultural lands, provides housing for persons and families of all incomes, and addresses the efficient extension of government services. Butte County LAFCo must consider the effect that any proposal will produce on existing agricultural lands. By guiding development toward vacant urban land and away from agricultural preserves, LAFCo assists with the preservation of valuable agricultural resources in Butte County. Butte County LAFCo has adopted the following policies regarding the protection and conversion of agricultural resources:</td>
</tr>
<tr>
<td>F-1</td>
<td>4.4-24</td>
<td>Third paragraph</td>
<td>The Butte County Environmental Health Division of the Butte County Public Health Department is the CUPA for Butte County. CalEPA periodically evaluates the ability of each CUPA to carry out the requirements of the Unified Program. A program evaluation of Butte County is currently underway.</td>
</tr>
</tbody>
</table>
## 4.0 Minor Revisions to the Draft EIR

<table>
<thead>
<tr>
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<th>DEIR Page Location</th>
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</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>County Environmental Health CUPA was conducted on November 14 and 15, 2007. The evaluation found that the Butte County Environmental Health CUPA's program performance is satisfactory with some improvement needed (CalEPA, 2007).</td>
<td></td>
</tr>
<tr>
<td>F-2</td>
<td>4.4-40</td>
<td>Second paragraph under Impact 4.4.3</td>
<td>Furthermore, increased population in these areas could increase the amount of household hazardous waste being transported to the Butte Regional Household Hazardous Waste Collection Facility (BRHHWCF). In most situations, state law prohibits the transportation of more than 5 gallons or 50 pounds of hazardous waste without a hazardous materials waste transportation license. Conditionally Exempt Small Quantity Generators may transport up to 27 gallons of hazardous waste to a Household Hazardous Waste Collection Facility with the facility's approval. In addition, the BRHHWCF could authorize transportation of up to 15 gallons of hazardous waste if adequate public education has been performed to provide for safe handling and transportation. Therefore, it is anticipated that the transport of additional household waste to the BRHHWCF would be in relatively small amounts and would not result in significant hazards to the public or environment.</td>
</tr>
<tr>
<td>F-3</td>
<td>4.4-41</td>
<td>First paragraph</td>
<td>The Butte County Environmental Health Department Division is the CUPA for Butte County and is responsible for consolidating, coordinating, and making consistent the administrative requirements, permits, inspections, and enforcement activities of six state programs regarding the transportation, use, and disposal of hazardous materials in Butte County and the Planning Area, as discussed under the Regulatory Framework subsection above. As CUPA, the Environmental Health Department inspects businesses or facilities that handle or store hazardous materials; generate and/or treat hazardous waste; own or operate underground storage tanks; store petroleum in above-ground tanks over state thresholds; and store Federal regulated hazardous materials over state thresholds. These inspections determine compliance with the California Health and Safety Code (HSC), and the California Code of Regulations (CCR), and the Code of Federal Regulations (CFR) and focus on site inspections, review of Hazardous Material Business Plans, documentation of employee training programs, disposal documentation for hazardous waste generated onsite, and UST monitoring records. All development or redevelopment under the General Plan Update that handle or store hazardous materials would be subject to these inspections, which would ensure compliance with state and federal law intended to prevent potential hazards to the public and the environment.</td>
</tr>
<tr>
<td>A-1</td>
<td>4.5-1</td>
<td>Fourth paragraph</td>
<td>Freeways serve regional and intercity travel but are typically not and should not become the optimum route for intracity trips. Access is controlled, grade crossings are separated, and medians separate lanes moving in opposite directions. Typical free-flow speeds exceed 55 miles per hour.</td>
</tr>
</tbody>
</table>
| A-3              | 4.5-32      | Additional text before Regional heading | **State Route 99 North Corridor System Management Plan**<p>The SR 99 North Corridor System Management Plan (CSMP) was developed by Caltrans to plan and manage transportation across modes and jurisdictional boundaries by bringing together facility operations and transportation service provisions with capital projects into a coordinated system management strategy. The CSMP outlines a foundation to support the partnership-based, integrated corridor management of all travel modes (transit, cars, trucks, bicycles) and...
<table>
<thead>
<tr>
<th>Comment Response</th>
<th>DEIR Page #</th>
<th>DEIR Page Location</th>
<th>Edits</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>infrastructure (rail tracks, roads, highways, information systems, bike routes) to provide mobility in the most efficient and effective manner possible. The SR 99 CSMP Transportation Network includes SR 99 from the intersection of Southgate Avenue south of the City of Chico to the intersection of Esplanade north of the city, as well as select parallel roads, transit services, and bike routes. Together, these facilities comprise the CSMP managed network. The CSMP identifies corridor management strategies to be applied on a network-wide basis, along with key capital projects to implement some of these strategies. In addition, the CSMP incorporates by reference all projects contained in the Butte County Association of Governments (BCAG) Regional Transportation Plan (RTP) (Caltrans, 2009).</td>
</tr>
<tr>
<td></td>
<td>A-5 4.5-53 through 4.5-54</td>
<td>First and fourth paragraphs</td>
<td>Widening SR 99 to three lanes without or with auxiliary lanes (northbound and southbound) between East 1st Avenue and SR 32 would result in acceptable LOS E or better operations on this segment of SR 99. The auxiliary lane improvements for this segment of SR 99 are an identified BCAG project, anticipated to proceed in the upcoming several years. However, given state funding shortfalls, and the fact that the City is not in control of the timing or implementation of this improvement, there is uncertainty regarding the ultimate timing of the improvement. According to Caltrans, Phase 1 of these improvements is complete and Phase 2 is programmed with estimated completion in 2013 (Bartlett, 2010). Given the uncertainty of the type and/or timing of improvements to these two segments of state facilities, the Nord Avenue Corridor, this impact is considered significant and unavoidable.</td>
</tr>
<tr>
<td></td>
<td>D-5 4.6-4</td>
<td>First and third paragraphs</td>
<td>Table 4.6-3 shows the federal and state attainment status for Butte County the SVAB. The County region is nonattainment for federal ozone and PM2.5 standards, and nonattainment for state ozone and PM10 and PM2.5 standards. As detailed in the Regulatory Framework discussion below, both the California Air Resources Board (CARB) and the U.S. Environmental Protection Agency (EPA) have established air pollution standards in an effort to protect human health and welfare. Geographic areas are designated attainment if these standards are met and nonattainment if they are not met. In addition, each agency has several levels of classifications based on severity of the problem. For example, the SVABButte County is classified moderate nonattainment area for 1-hour ozone, as summarized in Table 4.6-3.</td>
</tr>
<tr>
<td></td>
<td>2a-1 4.6-42</td>
<td>Last paragraph</td>
<td>The proposed General Plan Update seeks to reduce the environmental impact of land use development by limiting the amount of land consumed and increasing the viability of walking, biking, and transit by balancing growth and conservation through the reinforcement of the city’s compact urban form, establishing urban growth limits, and managing where and how growth and conservation will occur. The proposed General Plan Update and its Land Use Diagram would provide for growth while minimizing outward expansion of the City’s boundaries, would reduce increases in vehicle miles traveled within the city and thus reduce air quality impacts.</td>
</tr>
</tbody>
</table>
However, while implementation of proposed General Plan Update policies and actions would assist in preventing, reducing, and minimizing the proposed General Plan Update’s contribution to cumulative air quality impacts, this contribution is still considered **cumulatively considerable** and thus a **significant and unavoidable** impact as these actions might not fully offset air pollutant emissions resulting from construction and operational activities and could violate or substantially contribute to a violation in already nonattainment O₃, PM₁₀, and PM₂.₅ federal and state standards. Even with implementation of all the proposed BCAQMD-conforming policies identified in Table 4.6-9, the complete offset of air pollutant emissions resulting from future construction and operational activities may not be feasible in the case of every future potential development project. Therefore, this analysis conservatively concludes that the General Plan Update’s proposed policies and actions intended to offset air pollutant emissions resulting from future construction and operational activities can not guarantee the complete offset of resultant air pollutant emissions in every potential future development scenario for the next twenty years.

There are no feasible mitigation measures that can further offset air pollutant emissions from subsequent development and growth under the proposed General Plan Update. As stated in Section 21002.1(c) of the Public Resources Code, “if economic, social, or other conditions make it infeasible to mitigate one or more significant effects on the environment of a project, the project may nonetheless be carried out or approved at the discretion of a public agency if the project is otherwise permissible under applicable laws and regulations.” As stated above, the setting for this cumulative analysis consists of the Sacramento Valley Air Basin (SVAB) and associated growth and development anticipated in the SVAB. While the policies and actions in the proposed General Plan Update would provide direction for growth within the Chico city limits only, throughout the air basin, various city and county municipalities address criteria pollutants within the SVAB under their own set of established regulatory provisions, outside of the regulatory influence of the proposed Chico General Plan Update. In addition, a considerable amount of criteria pollutants monitored in the SVAB results from pollutants that have been transported from the San Francisco Bay Area. Therefore, the only mitigation available to adequately reduce cumulative impacts resulting from criteria pollutants within the SVAB to a less than cumulatively considerable level would require inter-jurisdictional coordination between every municipality in the SVAB and likely even the Bay Area (due to the air pollutant transport from the Bay Area). The magnitude of such an effort has been deemed infeasible due to the reliance on other jurisdictions, beyond the control of the proposed General Plan Update, to cooperate in a meaningful way.

<table>
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<th>Edits</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>4.11-9</td>
<td>Last sentence of first paragraph</td>
<td>The historically significant Wright-Patrick House Thomas Wright-Old Patrick Ranch House (1852) is currently located beyond city limits and is proposed to be relocated within the city (PMC, 2008).</td>
</tr>
<tr>
<td>C-3</td>
<td>4.11-9</td>
<td>First sentence</td>
<td>The city includes <strong>three four</strong> California Historical Landmarks:</td>
</tr>
<tr>
<td>C-1</td>
<td>4.11-16</td>
<td>Additional text under the list of policies and actions</td>
<td><strong>Action CRHP-1.1.7</strong> (Records Search) – Continue to consult and require record searches for discretionary projects with the Northeast Center of the California Historical</td>
</tr>
</tbody>
</table>
### 4.0 Minor Revisions to the Draft EIR

<table>
<thead>
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<th>Comment Response</th>
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</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Action CRHP-1.1.8</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Information System located at CSU Chico.</td>
</tr>
<tr>
<td>E-20</td>
<td>4.12-16</td>
<td>Last paragraph</td>
<td>The CPD is funded via the city’s General Fund and various fees (administrative fees, police officer services fees, alarm fees, etc.). In addition, the city collects a police protection building and equipment fee from all new development. These fees are used to fund site acquisition, construction, improvement and equipping of police protection buildings and facilities, and acquisition and improvement of police protection equipment. The current police protection building and equipment fees for new development are $834 for single-family residences and $940 for multi-family residences.</td>
</tr>
<tr>
<td>E-21</td>
<td>4.12-36</td>
<td>First paragraph, last sentence</td>
<td>Although no recycled water use is immediately planned, Cal Water is examining the potential for recycled water to meet 2030 water supply demands in the Chico District (Pembroke, 2009).</td>
</tr>
<tr>
<td>E-24</td>
<td>4.12-65</td>
<td>Additional text after second paragraph</td>
<td>According to the California Integrated Water Quality System, which details sanitary sewer overflows reported to the State Water Resource Control Board, the Chico sewer system had five sanitary sewer overflows during the 10-year time period between January 2000 and December 2010. Of the 2,080 gallons discharged during those five overflows, 2,010 gallons were recovered.</td>
</tr>
<tr>
<td>F-5</td>
<td>4.12-68</td>
<td>First paragraph</td>
<td>Butte County Environmental Health Division</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>In Butte County, septic systems are regulated by the Environmental Health Division. The County is currently preparing an environmental impact report (EIR) for the Butte County Individual On-Site Wastewater Ordinance. The ordinance would apply to unincorporated portions of Butte County not served by municipal wastewater treatment and disposal facilities. The ordinance would update and replace existing County regulations in order to be consistent with applicable requirements of the Central Valley RWQCB Basin Plan and to incorporate other changes based on the current state of knowledge and advances in practices and technologies for on-site wastewater treatment and disposal. Notably, the ordinance would (a) implement more standardized procedures for soil and site evaluations; (b) incorporate new requirements pertaining to the vertical separation between the bottom of dispersal systems and groundwater or restrictive layers; (c) provide a broader range of treatment and dispersal designs; and (d) institute a program to assure ongoing maintenance of certain types of systems (Butte County, 2009). [It should be noted that, since the release of the NOP and the commencement of the environmental analysis for this DEIR, Butte County adopted the On-Site Wastewater Ordinance on March 16, 2010.]</td>
</tr>
</tbody>
</table>
| E-6              | 5.0-2       | Local Adopted General Plans bullet | Local Adopted General Plans. These are the existing land use plans in the region, consisting of the cities of Biggs, Gridley, and Oroville, the Town of Paradise, and Butte County. It should be noted that Butte County is currently in the process of updating its general plan (public draft released in 2009), which includes land use planning for some
4.0 Minor Revisions to the Draft EIR

<table>
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<th>Edits</th>
</tr>
</thead>
</table>
|                  |             |                    | areas that are also addressed in the City of Chico’s proposed General Plan Update. This Draft EIR cumulative setting and impact analysis acknowledges the Butte County general plan update process. [It should be noted that, since the release of the NOP and the commencement of the environmental analysis for this DEIR, Butte County adopted the Butte County General Plan 2030 on October 26, 2010.]

4.3 Minor Changes and Edits to DEIR Tables and Figures

4.3.1 Revision to Tables

Table 4.6-2 of the DEIR is revised as follows:

**Table 4.6-2
Ambient Air Quality Monitoring Data for Chico (Manzanita Avenue)**

<table>
<thead>
<tr>
<th>Pollutant Standards</th>
<th>2006</th>
<th>2007</th>
<th>2008</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ozone</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Max 1-hour concentration (ppm)</td>
<td>0.090</td>
<td>0.094</td>
<td>0.111</td>
</tr>
<tr>
<td>Max 8-hour concentration (ppm)</td>
<td>0.080/0.080</td>
<td>0.084/0.084</td>
<td>0.096/0.097</td>
</tr>
<tr>
<td>Number of days standard exceeded</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>State 1-hour standard</td>
<td>0</td>
<td>0</td>
<td>2</td>
</tr>
<tr>
<td>Federal 8-hour standard</td>
<td>4</td>
<td>3</td>
<td>6</td>
</tr>
<tr>
<td>State 8-hour standard</td>
<td>19</td>
<td>10</td>
<td>14</td>
</tr>
<tr>
<td>Coarse Particulate Matter (PM₁₀)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Max 24-hour concentration (µg/m³)</td>
<td>76.0/81.0</td>
<td>61.9/66.1</td>
<td>143.5/140.8</td>
</tr>
<tr>
<td>Annual average concentration (µg/m³)</td>
<td>26.8</td>
<td>21.7</td>
<td>27.6</td>
</tr>
<tr>
<td>Number of days standard exceeded</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Federal 24-hour standard</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>State 24-hour standard</td>
<td>41.0</td>
<td>12.1</td>
<td>37.0</td>
</tr>
<tr>
<td>Fine Particulate Matter (PM₂.₅)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Max 24-hour concentration (µg/m³)</td>
<td>67.0/76.1</td>
<td>53.9/83.7</td>
<td>107.6/190.9</td>
</tr>
<tr>
<td>Annual average concentration (µg/m³)</td>
<td>13.1/14.6</td>
<td>10.6/14.3</td>
<td>16.4/18.1</td>
</tr>
<tr>
<td>Number of days standard exceeded</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Federal 24-hour standard</td>
<td>28.8</td>
<td>24.3</td>
<td>36.5</td>
</tr>
<tr>
<td>Carbon Monoxide (CO)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Max 8-hour concentration (ppm)</td>
<td>2.70</td>
<td>2.16</td>
<td>2.74</td>
</tr>
<tr>
<td>Number of days standard exceeded</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Federal 8-hour standard</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>
### Table 4.6-3
**Federal and State Ambient Air Quality Attainment Status**
*For Sacramento Valley Air Basin, Butte County*

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Federal</th>
<th>State</th>
</tr>
</thead>
<tbody>
<tr>
<td>1-hour Ozone (O₃)</td>
<td>–</td>
<td>Moderate Nonattainment</td>
</tr>
<tr>
<td>8-hour Ozone (O₃)</td>
<td>Nonattainment</td>
<td>Nonattainment</td>
</tr>
<tr>
<td>Coarse Particulate Matter (PM₁₀)</td>
<td>Unclassified</td>
<td>Nonattainment</td>
</tr>
<tr>
<td>Fine Particulate Matter (PM₂.₅)</td>
<td>Nonattainment</td>
<td>Nonattainment</td>
</tr>
<tr>
<td>Carbon Monoxide (CO)</td>
<td>Attainment</td>
<td>Attainment</td>
</tr>
<tr>
<td>Nitrogen Dioxide (NO₂)</td>
<td>Attainment</td>
<td>Attainment</td>
</tr>
<tr>
<td>Sulfur Dioxide (SO₂)</td>
<td>Attainment</td>
<td>Attainment</td>
</tr>
</tbody>
</table>

Source: BCAQMD, 2009; CARB, 2010

The following text and table is added to page 4.12-61 of the DEIR, after Table 4.12.5-2:

The average monthly influent flow received by the WPCP in 2008 and 2009 is shown in **Table 4.12.5-3**.

### Table 4.12.5-3
**Chico WPCP Average Monthly Influent Flow 2008 and 2009**

<table>
<thead>
<tr>
<th>Month</th>
<th>Influent Flow (MGD)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2008</td>
</tr>
<tr>
<td>January</td>
<td>8.4</td>
</tr>
<tr>
<td>February</td>
<td>8.8</td>
</tr>
<tr>
<td>March</td>
<td>7.4</td>
</tr>
<tr>
<td>April</td>
<td>7.3</td>
</tr>
<tr>
<td>May</td>
<td>7.0</td>
</tr>
</tbody>
</table>
4.0 MINOR REVISIONS TO THE DRAFT EIR

<table>
<thead>
<tr>
<th>Month</th>
<th>Influent Flow (MGD)</th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
</table>


The following text and table is added to page 4.12-63 of the DEIR, before the “State Revolving Fund” heading:

The current monthly sewer service charge is $16.75 per unit in the City of Chico and $17.44 per unit in unincorporated County areas. The City’s sewer connection fees are shown in Table 4.12.5-4 below. The table does not include Lift Station Fees, which are specific to certain areas served by lift stations and can only be determined on a case by case basis.

**Table 4.12.5-6**

**SEWER CONNECTION FEES**

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Trunk</th>
<th>Plant</th>
<th>Main Front Ft.</th>
<th>Lateral Linear Ft.</th>
<th>Unit Of Measure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Single Family Residential</td>
<td>$1,693.00</td>
<td>$2,251.00</td>
<td>$46.09</td>
<td>$28.63</td>
<td>unit/ff/lf</td>
</tr>
<tr>
<td>Multiple Family Residential</td>
<td>$1,693.00</td>
<td>$2,251.00</td>
<td>$46.09</td>
<td>$28.63</td>
<td>unit/ff/lf</td>
</tr>
<tr>
<td>Motel/Hotel with restaurant facilities</td>
<td>$1,693.00</td>
<td>$2,251.00</td>
<td>$46.09</td>
<td>$28.63</td>
<td>room</td>
</tr>
<tr>
<td>Motel/Hotel without restaurant facilities</td>
<td>$847.00</td>
<td>$1,125.00</td>
<td>$46.09</td>
<td>$28.63</td>
<td>room</td>
</tr>
<tr>
<td>Convalescent Hospitals</td>
<td>$847.00</td>
<td>$1,125.00</td>
<td>$46.09</td>
<td>$28.63</td>
<td>bed</td>
</tr>
<tr>
<td>Hospitals</td>
<td>$1,270.00</td>
<td>$1,688.00</td>
<td>$46.09</td>
<td>$28.63</td>
<td>bed</td>
</tr>
<tr>
<td>Dormitory, Group Dwelling w/ Food Services, or, Boarding House</td>
<td>$564.00</td>
<td>$750.00</td>
<td>$46.09</td>
<td>$28.63</td>
<td>occ</td>
</tr>
<tr>
<td>Dormitory without Food Services, or Rooming House</td>
<td>$282.00</td>
<td>$375.00</td>
<td>$46.09</td>
<td>$28.63</td>
<td>occ</td>
</tr>
<tr>
<td>Schools</td>
<td>$184.00</td>
<td>$245.00</td>
<td>$46.09</td>
<td>$28.63</td>
<td>fte</td>
</tr>
<tr>
<td>Park or Recreational Facility</td>
<td>$85.00</td>
<td>$113.00</td>
<td>$46.09</td>
<td>$28.63</td>
<td>fu</td>
</tr>
<tr>
<td>All other</td>
<td>$6,773.00</td>
<td>$9,003.00</td>
<td>$46.09</td>
<td>$28.63</td>
<td>acre</td>
</tr>
</tbody>
</table>

Source: City of Chico, 2010.
The titles of Tables 4.12.5-3, 4.12.5-4, and 4.12.5-5 on pages 4.12-62, 4.12-71 and 4.12-72, respectively, of the DEIR are revised as follows:

<table>
<thead>
<tr>
<th>Table 4.12.5-34</th>
</tr>
</thead>
<tbody>
<tr>
<td>PROJECTED WASTEWATER FLOWS</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Table 4.12.5-46</th>
</tr>
</thead>
<tbody>
<tr>
<td>PROJECTED WASTEWATER FLOW AT BUILD-OUT OF THE PROPOSED GENERAL PLAN UPDATE</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Table 4.12.5-57</th>
</tr>
</thead>
<tbody>
<tr>
<td>TYPES OF POTENTIAL ENVIRONMENTAL IMPACTS ASSOCIATED WITH NEW WASTEWATER TREATMENT AND SUPPLY INFRASTRUCTURE</td>
</tr>
</tbody>
</table>

4.3.2 Revision to Figures

Figure 3.0-2 has been revised to reflect both the existing and proposed SOIs (Response E-3).

The word “Proposed” has been deleted from the title of Figure 4.1-1 and the land use designations have been updated to reflect the County’s adopted General Plan (Response E-9).

The legend of Figure 4.2-2 has been revised to state “Williamson Act –” in front of each agricultural classification (Response E-16).

Figure 4.5-2 has been revised to reflect the correct traffic volumes in Inset A.

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Figure 3.0-2

2030 General Plan Planning Area

Source: City of Chico GIS, 2007
Figure 4.1-1
Proposed Butte County General Plan Update
Land Uses in Chico Area

Source: Butte County Geographic Information Systems
Figure 4.2-2

Williamson Act/Preserved Agricultural Lands

Legend
- Proposed Sphere of Influence
- Special Planning Area Boundary
- Planning Area
- Williamson Act –Prime Agricultural Land
- Williamson Act –Non-Prime Agricultural Land

Source: CA Dept. of Conservation Williamson Act Lands 2006, City of Chico GIS, 2007
Figure 4.5-2
PM Peak Hour Traffic Volumes - Existing Conditions
5.0 MINOR REVISIONS TO THE PROPOSED GENERAL PLAN
5.0 MINOR REVISIONS TO THE PROPOSED GENERAL PLAN

5.1 INTRODUCTION

The following section describes minor modifications made to the proposed City of Chico General Plan Update since release of the DEIR. Also included is a discussion of any changes to the environmental analysis in the DEIR as a result of these minor modifications.

5.2 MINOR CHANGES AND EDITS TO THE GENERAL PLAN UPDATE

SECTION 1 – INTRODUCTION

Modifications to the introduction section were limited to minor textual changes that do not change the intent or requirements of the section in any appreciable manner. Also included in the modifications were minor clarifications to the process followed during preparation of the proposed General Plan Update. However, none of the modifications to Section 1.0 would affect the physical environment, nor would they change any requirement, plan, or program presented in the proposed General Plan Update. Therefore, these changes have no effect on the environmental effect of implementation of the proposed General Plan Update.

SECTION 2 – SUSTAINABILITY

Modifications to the Introduction, Sustainability Components, Issues and Considerations, Citizen Participation, and Fostering Partnerships subsections were limited to minor textual changes that do not alter the intent or requirements of the section. Included in these changes was expansion of the definition of the term social equity. However, according to the CEQA Guidelines, social and economic effects of a given project are not considered environmental impacts. Therefore, this change does not affect the environmental impacts discussed in the Draft EIR.

Modifications to Section 2 also included minor textual changes to several goals and policies, including modification of the following:

- Action SUS-1.2.1
- Action SUS-1.3.1
- Action SUS-1.3.2
- Policy SUS-1.4
- Action SUS-1.5.1
- Policy SUS-2.1
- Policy SUS-2.2
- Action SUS-3.1.1
- Action SUS-3.3.1
- Policy SUS-3.4
- Action SUS-3.4.1
- Goal SUS-4
- Policy SUS-4.1
- Action SUS-4.1.1
- Action SUS-4.1.2
- Action SUS-4.2.1
- Policy SUS-4.3
- Action SUS-4.3.1
- Action SUS-4.3.2
- Action SUS-4.3.3
- Policy SUS-5.1
- Action SUS-5.1.1
- Action SUS-5.2.1
- Policy SUS-5.2.3
- Action SUS-5.2.4
- Goal SUS-6
- Policy SUS-6.1
- Policy SUS-6.2
- Action SUS-6.2.1
- Action SUS-6.2.2
- Policy SUS-6.3
- Action SUS-7.1.2
- Action SUS-7.2.1
- Action SUS-7.2.2
- Action SUS-5.1.2
- Action SUS-5.2.1
- Action SUS-5.2.3
- Goal SUS-4

Changes to the goals, policies, and actions listed above constituted minor textual edits and clarifications that had little functional change to those goals, policies, and actions and would...
therefore not result in any appreciable modification of the environmental impacts of the proposed General Plan Update as discussed in the DEIR.

Several additional changes were made to goals, policies, and actions that could, by their nature, cause a modification in the scope or effect of that given feature, resulting in some modification of the expected environmental impact(s) of the proposed General Plan Update. Those specific goals, policies, and actions that fall into this category are discussed below as well as the expected change in environmental impact that would occur as a result of these modifications.

**Table 5.0-1**  
**Substantive Changes to Sustainability Goals, Policies, and Actions and Their Expected Environmental Effects**

<table>
<thead>
<tr>
<th>Goal/Policy/Action</th>
<th>Changed or New</th>
<th>Modification Made</th>
<th>Environmental Effect</th>
</tr>
</thead>
<tbody>
<tr>
<td>Action SUS-1.3.3</td>
<td>New</td>
<td>Require assignment of a Sustainability Coordinator.</td>
<td><strong>Negligible</strong> – No functional change in the requirements of the General Plan Update.</td>
</tr>
<tr>
<td>Action SUS-1.4.2</td>
<td>New</td>
<td>Requires periodic update to the City’s Diversity Action Plan.</td>
<td><strong>None</strong> – Social/economic impacts are not a part of CEQA, pursuant to the CEQA Guidelines.</td>
</tr>
<tr>
<td>Action SUS-1.5.3</td>
<td>New</td>
<td>Develop a Chico Green Business Certification program.</td>
<td><strong>Negligible to Positive</strong> – Such a program could result in a more coordinated response to sustainability issues as well as increased incentives for local businesses to incorporate sustainable design and practices into their operations, likely having a positive effect on the environment.</td>
</tr>
<tr>
<td>Policy SUS-1.6</td>
<td>New</td>
<td>Emphasize public health in planning and City policies and programs.</td>
<td><strong>Positive</strong> – Emphasizing public health in City programs and policies, as well as during the planning process, would likely have a net benefit in regard to human health and hazards impacts (see Section 4.4 of the Draft EIR).</td>
</tr>
<tr>
<td>Action SUS-2.2.1</td>
<td>New</td>
<td>Enhanced web links between City sites and other agencies.</td>
<td><strong>Negligible to Positive</strong> – Enhanced inter-agency Web connections would likely increase the effectiveness of the City website in educating residents and developers as to the inter-agency concerns of any projects, resulting in a possible environmental benefit.</td>
</tr>
<tr>
<td>Policy SUS-3.2</td>
<td>Changed</td>
<td>Add water usage to the existing requirement to reduce energy usage in municipal operations.</td>
<td><strong>Positive</strong> – A mandate to reduce water usage will have a net benefit to water supply and water infrastructure impacts identified in the Draft EIR by reducing the quantity of water needed by City operations and buildings.</td>
</tr>
<tr>
<td>Goal/Policy/Action</td>
<td>Changed or New</td>
<td>Modification Made</td>
<td>Environmental Effect</td>
</tr>
<tr>
<td>-------------------</td>
<td>---------------</td>
<td>-------------------</td>
<td>----------------------</td>
</tr>
<tr>
<td>Action SUS-3.3.2</td>
<td>New</td>
<td>Explore reductions in consumption and increase reuse of City materials, vehicles, and equipment.</td>
<td>Negligible to Positive – Reuse of materials and equipment, as well as reductions in consumption, would likely have a positive effect on the environment, namely in the areas of solid waste capacity and hazardous materials (disposal versus reuse). However, maintaining City vehicles for longer periods may preclude the City’s ability to purchase vehicles with higher gas mileage and lower emissions than those currently in the inventory. This would likely result in a minor increase in air quality emissions over time. Given the relatively slow rate of innovation in gas mileage and emissions controls for vehicles, especially for heavy vehicles typically utilized by cities, this impact is expected to be negligible.</td>
</tr>
<tr>
<td>Action SUS-3.3.3</td>
<td>New</td>
<td>Monitor progress toward reducing the environmental impact of City operations.</td>
<td>Negligible – Monitoring City efforts toward reducing impacts is already a required feature of CEQA (see Mitigation Monitoring and Reporting Program). As such, this new action simply codifies a CEQA requirement in the General Plan, resulting in a negligible environmental effect.</td>
</tr>
<tr>
<td>Goal SUS-5</td>
<td>Changed</td>
<td>Change required reduction in “non-renewable resource” consumption to state “non-renewable energy.”</td>
<td>Negligible – While this change may appear to exclude non-energy resources from the implementation of this goal, the policies and action items under this goal were and remain focused entirely on energy resources alone. As such, changes to this goal would produce no functional change in the General Plan and would result in negligible modification of any environmental impacts (see Section 4.14 of the Draft EIR).</td>
</tr>
<tr>
<td>Action SUS-5.1.3</td>
<td>New</td>
<td>Monitor and improve public awareness of required energy conservation upgrades upon resale of homes.</td>
<td>Positive – See discussion under Action SUS-3.3.3 above. The same concept applies here.</td>
</tr>
<tr>
<td>Action SUS-6.2.3</td>
<td>Changed</td>
<td>Addition of requirement to revisit GHG reduction goals beyond 2020.</td>
<td>Positive – This change effectively extends the positive effects of Action SUS-6.2.3 beyond the threshold of the 2020 emission reduction goal. Extending the action beyond 2020 will have a net beneficial effect over time.</td>
</tr>
<tr>
<td>Action SUS-7.1.3</td>
<td>New</td>
<td>Reduce barriers to small animal keeping in residential districts.</td>
<td>Negligible – The effects of small animal keeping in residential areas is commonly considered to be analogous to the keeping of outdoor pets such as dogs. Furthermore, the modification of the Municipal Code called for in this action would not preclude the noise and odor restrictions...</td>
</tr>
</tbody>
</table>
SECTION 3 – LAND USE

Modifications to the Introduction, Planning for Future Needs, Issues and Considerations, Major Land Use Components, Land Use Designations and Diagram, and Development Potential subsections were limited to minor textual changes that do not alter the intent or requirements of the section. Therefore, this change does not affect the environmental impacts discussed in the Draft EIR.

Also modified was language regarding the proposed General Plan Update’s compatibility with the requirements of the Butte County Airport Land Use Commission (ALUC). Originally, inconsistencies were identified between the proposed General Plan Update and the Airport Land Use Compatibility Plan (ALUCP). However, changes to the Land Use Diagram have been made that call for the designation of appropriate airport overlay zones which conform to the requirements of the ALUC and the ALUCP. Therefore, this change represents a reduction in impact to local air traffic patterns and safety concerns for aircraft as well as persons and structures on the ground.

Modifications to Section 3 also included minor textual changes to several goals and policies, including modification of the following:

- Goal LU-1
- Policy LU-1.1
- Action LU-1.1.1
- Action LU-1.3.1
- Action LU-1.3.2
- Action LU-1.3.3
- Policy LU-2.1
- Action LU-2.2.2
- Action LU-2.3.1
- Action LU-2.3.3
- Policy LU-3.1
- Action LU-3.4.4
- Policy LU-4.1
- Action LU-4.1.1
- Action LU-4.2.3
- Action LU-5.1.2
- Action LU-5.1.4
- Action LU-6.1.2
- Action LU-7.1.3

Changes to the goals, policies, and actions listed above constituted minor textual edits and clarifications that had little functional change to those goals, policies, and actions and would therefore not result in any appreciable modification of the environmental impacts of the General Plan Update.

Several additional changes were made to goals, policies, and actions that could, by their nature, cause a modification in the scope or effect of that given feature, resulting in some modification of the expected environmental impact(s) of the General Plan Update. Those specific goals, policies, and actions that fall into this category are discussed below as well as the expected change in environmental impact that would occur as a result of these modifications.


### Table 5.0-2

**Substantive Changes to Land Use Goals, Policies, and Actions and Their Expected Environmental Effects**

<table>
<thead>
<tr>
<th>Goal/Policy/Action</th>
<th>Changed or New</th>
<th>Modification Made</th>
<th>Environmental Effect</th>
</tr>
</thead>
<tbody>
<tr>
<td>Action LU-2.3.6</td>
<td>New</td>
<td>Consider increasing City discretion regarding new or expanded large-format retail.</td>
<td><strong>Negligible</strong> – Action only allows for consideration of large-format retail. No function change in zoning or land use would result.</td>
</tr>
<tr>
<td>Policy LU-2.4</td>
<td>Changed</td>
<td>Environmental review was added to methods to promote land use compatibility.</td>
<td><strong>Positive</strong> – The addition of environmental review will ensure that impacts related to land use compatibility would be addressed throughout the entitlement process.</td>
</tr>
<tr>
<td>Policy LU-2.5</td>
<td>Changed</td>
<td>Now requires protection of all areas with known sensitive resources, not just open space.</td>
<td><strong>Positive</strong> – This change increases the scope of protection for sensitive resources offered previously, resulting in reduced potential for impacts to these resources in the future.</td>
</tr>
<tr>
<td>Action LU-2.5.1</td>
<td>Changed</td>
<td>Property owners must conduct environmental studies on properties in the Resources Constraint Overlay and must conform to CEQA requirements.</td>
<td><strong>Positive</strong> – This change strengthens the protection for resources within the Resource Constraint Overlay and ensures compliance with CEQA, resulting in reduced potential impacts from future development.</td>
</tr>
<tr>
<td>Policy LU-2.6</td>
<td>Changed</td>
<td>Pedestrian/bicycle routes are acceptable uses within 100-foot agricultural buffers.</td>
<td><strong>Negligible</strong> – The use of pedestrian/bicycle paths in agricultural buffers will likely have no effect on agricultural resources and will have no greater environmental effect during installation than other features allowed under this policy (i.e., roadways).</td>
</tr>
<tr>
<td>Action LU-2.7.2</td>
<td>Changed</td>
<td>Reclassified as Policy LU-2.8. No other changes.</td>
<td><strong>None</strong> – Reclassifying this action to a policy does not change the physical requirements of the action/policy, nor would it change any expected environmental effect.</td>
</tr>
<tr>
<td>Policy LU-3.2</td>
<td>Changed</td>
<td>Neighborhood serving centers are no longer required to include housing opportunities, nor are they required to be served by transit. However, they can include cultural uses.</td>
<td><strong>Negligible</strong> – The exclusion of a requirement for housing opportunities in neighborhood serving centers could potentially reduce the number of homes available in the city. Therefore, no change in significance is expected in any impacts identified in the DEIR. The exclusion of a requirement for transit service at neighborhood serving centers would not preclude those centers from being served by transit; it would only allow neighborhood serving centers to exist without transit service. Therefore, this change would not affect any environmental impacts identified in the DEIR and no change in significance is anticipated (see Section 4.5 of the DEIR).</td>
</tr>
<tr>
<td>Action LU-4.1.2</td>
<td>Changed</td>
<td>Development fees also vary by</td>
<td><strong>Negligible</strong> – Fees are a function of the</td>
</tr>
</tbody>
</table>
### 5.0 Minor Revisions to the Proposed General Plan

<table>
<thead>
<tr>
<th>Goal/Policy/Action</th>
<th>Changed or New</th>
<th>Modification Made</th>
<th>Environmental Effect</th>
</tr>
</thead>
<tbody>
<tr>
<td>Action LU-4.2.2</td>
<td>Changed</td>
<td>Reclassified as Policy LU-4.3.</td>
<td>None – Reclassifying this action to a policy does not change the physical requirements of the action/policy, nor would it change any expected environmental effect.</td>
</tr>
<tr>
<td>Policy LU-4.3</td>
<td>Changed</td>
<td>Renumbered to Policy LU-4.4 due to reclassification of Action LU-4.2.2 to Policy LU-4.3.</td>
<td>None – Changing the number of this policy does not change the physical requirements of the policy, nor would it change any expected environmental effect.</td>
</tr>
<tr>
<td>Action LU-5.1.4</td>
<td>Changed</td>
<td>Addition of on-street parking and public art to options for streetscape enhancement.</td>
<td>Negligible – The inclusion of on-street parking could increase parking capacity in the Corridor Opportunity Sites. This change would be consistent with the goal of revitalizing these sites and no change in significance is expected in any impacts identified in the DEIR.</td>
</tr>
<tr>
<td>Policy LU-6.1</td>
<td>Change</td>
<td>Name change from Diamond Match SPA to Barber Yard SPA.</td>
<td>None – Only the name of the Special Planning Area has changed. As such, no change in environmental effect would result.</td>
</tr>
<tr>
<td>Action LU-6.2.1</td>
<td>Change</td>
<td>Detailed land use planning must be completed before development.</td>
<td>Positive – The prior version of this action could potentially allow development to progress without concentrated land use planning in an SPA. This change would ensure that such planning is conducted prior to development, helping to ensure that land use conflicts and thus environmental effects are minimized prior to site disturbance. Other textual changes were made to this action; however, they represent minor clarifications and different verbiage choices and would thus have no effect on potential environmental impacts.</td>
</tr>
<tr>
<td>Action LU-6.2.3</td>
<td>Change</td>
<td>Name change from Diamond Match SPA to Barber Yard SPA.</td>
<td>None – Only the name of the Special Planning Area has changed. As such, no change in environmental effect would result.</td>
</tr>
<tr>
<td>Action LU-6.2.4</td>
<td>Change</td>
<td>Action now concerns integrated open space of any size, not just &quot;significant&quot; amounts. Also, wildfire hazards must be addressed.</td>
<td>Positive – Planning in the Doe Mill/Honey Run SPA would a greater amount of open space, resulting in potential preservation of more open space than was directed under the previous version of this action. Likewise, wildland fire risk would be considered, reducing the chance for wildland fire hazards (see Section 4.4, Impact 4.4.1).</td>
</tr>
</tbody>
</table>
### 5.0 Minor Revisions to the Proposed General Plan

<table>
<thead>
<tr>
<th>Goal/Policy/Action</th>
<th>Changed or New</th>
<th>Modification Made</th>
<th>Environmental Effect</th>
</tr>
</thead>
<tbody>
<tr>
<td>Action LU-6.2.6</td>
<td>Change</td>
<td>Planning in the South Entler SPA must avoid designated FEMA flood zones.</td>
<td>Positive – Avoidance of FEMA flood zones ensures that structures would not be placed in these zones, reducing potential flooding impacts (see Section 4.9, Impact 4.9.4).</td>
</tr>
<tr>
<td>Goal LU-7</td>
<td>Changed</td>
<td>Ranchaero Airport added to list of airports to protect.</td>
<td>Positive – Including consideration of Ranchaero Airport would reduce potential land use conflicts, noise impacts, and safety impacts of land uses adjacent to or in the vicinity of Ranchaero Airport.</td>
</tr>
<tr>
<td>Policy LU-7.1</td>
<td>Changed</td>
<td>Ranchaero Airport added to list of airports to protect.</td>
<td>Positive – Including consideration of Ranchaero Airport would reduce potential land use conflicts, noise impacts, and safety impacts of land uses adjacent to or in the vicinity of Ranchaero Airport.</td>
</tr>
<tr>
<td>Action LU-7.1.4</td>
<td>Deleted</td>
<td>Request for revision of the ALUCP deleted.</td>
<td>Negligible – This action was made moot by coordination between the City and the ALUC as well as inclusion of airport overlay zones in the General Plan Update. As such, this action is superfluous and was deleted.</td>
</tr>
</tbody>
</table>

### SECTION 4 – CIRCULATION

Modifications to the Introduction, Issues and Considerations, Transportation and Planning Context, and Multimodal Circulation System subsections were limited to minor textual changes that do not alter the intent or requirements of the section, that is, except for a portion of the Issues and Considerations subsection titled Sustainable Circulation Plan. A discussion of the results of the City’s greenhouse gas (GHG) emissions inventory and transportation’s impact on GHG emissions was added. However, this change and the changes to the subsections listed above have no functional change on the environmental impacts of the General Plan Update.

One substantive change was made to Table CIRC-2, in which the Hicks Lane Realignment was omitted from the list of roadway connections for future study. The omission of this potential improvement would have little change on existing circulation conditions, and the fact that construction would not be expected on this portion of roadway would mean that environmental impacts from such construction would not occur. As such, the deletion of this particular improvement from Table CIRC-2 of the General Plan Update would have little or no effect on the environment.

Modifications to Section 4 also included minor textual changes to several goals and policies, including modification of the following:

- Action CIRC-1.1.1
- Policy CIRC-1.3
- Policy CIRC-1.4
- Action CIRC-1.6.1
- Action CIRC-1.6.2
- Policy CIRC-2.2
- Action CIRC-3.6.1
- Policy CIRC-4.2
- Action CIRC-4.3.2
- Action CIRC-5.3.1
- Goal CIRC-6
- Policy CIRC-6.2
- Action CIRC-7.1.1
- Action CIRC-8.2.1
- Goal CIRC-9
5.0 MINOR REVISIONS TO THE PROPOSED GENERAL PLAN

- Policy CIRC-9.3

Changes to the goals, policies, and actions listed above constituted minor textual edits and clarifications that had little functional change to those goals, policies, and actions and would therefore not result in any appreciable modification of the environmental impacts of the General Plan Update.

Several additional changes were made to goals, policies, and actions that could, by their nature, cause a modification in the scope or effect of that given feature, resulting in some modification of the expected environmental impact(s) of the General Plan Update. Those specific goals, policies, and actions that fall into this category are discussed below as well as the expected change in environmental impact that would occur as a result of these modifications.

**Table 5.0-3**
**SUBSTANTIVE CHANGES TO CIRCULATION GOALS, POLICIES, AND ACTIONS AND THEIR EXPECTED ENVIRONMENTAL EFFECTS**

<table>
<thead>
<tr>
<th>Goal/Policy/Action</th>
<th>Changed or New</th>
<th>Modification Made</th>
<th>Environmental Effect</th>
</tr>
</thead>
<tbody>
<tr>
<td>Action CIRC-2.2.4</td>
<td>New</td>
<td>Work with the Chico Unified School District to improve safe routes to schools.</td>
<td>Positive – Coordination with the Chico Unified School District regarding safe school routes will increase student safety to and from school, reducing potential transportation safety impacts (see Section 4.5, Impacts 4.5.5 and 4.5.6, of the DEIR).</td>
</tr>
<tr>
<td>Action CIRC-3.1.2</td>
<td>New</td>
<td>Enhance connectivity of bike facilities.</td>
<td>Positive – Improvements to bike facilities can result in more incentives for residents and visitors to use bike facilities and thus use their motor vehicles less, resulting in incremental decreases in vehicle emissions and a lessening of traffic loads.</td>
</tr>
<tr>
<td>Policy CIRC-4.3</td>
<td>Changed</td>
<td>Streets near schools added to roadways that should include safe pedestrian elements. On-street parking added to list of potential enhancements.</td>
<td>Negligible to Positive – Adding roadways near schools to those considered by this policy will increase the opportunities for this policy to be enacted, resulting in an environmental benefit to pedestrian safety.</td>
</tr>
<tr>
<td>Policy CIRC-5.2</td>
<td>Changed</td>
<td>Employment centers added to areas to be served by a central city transit route.</td>
<td>Positive – Enhanced service areas for a transit route would increase the number of properties served by such a route and thus increase the number of potential riders, resulting in a beneficial effect on transit use and traffic loading.</td>
</tr>
<tr>
<td>Action CIRC-8.1.1</td>
<td>Changed</td>
<td>Included shared parking as a possible method for reducing trips.</td>
<td>Positive – Including more options for reducing vehicle trips would have a beneficial effect on the number of spaces required and thus the amount of impervious surfaces (paving) required for parking spaces. Likewise, reduced trips would result in less expansion of roadways/transportation modes, resulting in incrementally fewer environmental impacts that result from such expansions.</td>
</tr>
</tbody>
</table>
## 5.0 Minor Revisions to the Proposed General Plan

<table>
<thead>
<tr>
<th>Goal/Policy/Action</th>
<th>Changed or New</th>
<th>Modification Made</th>
<th>Environmental Effect</th>
</tr>
</thead>
<tbody>
<tr>
<td>Action CIRC-8.1.2</td>
<td>Changed</td>
<td>Availability of nearby on-street parking and parking facilities also to be considered in required changes to the Municipal Code parking requirements.</td>
<td>Positive – See CIRC-8.1.1 above.</td>
</tr>
<tr>
<td>Action CIRC-8.2.2</td>
<td>New</td>
<td>Preferred parking for renewable energy vehicles and electric vehicle charging stations to be included in new public parking facilities.</td>
<td>Positive – These types of features help to promote alternative-fueled vehicle use and thus a reduction in vehicle emissions in the city, incrementally reducing air quality impacts from such emissions (see Section 4.6 of the DEIR).</td>
</tr>
<tr>
<td>Action CIRC-9.1.2</td>
<td>Changed</td>
<td>Action now only considers existing employer trip reduction programs.</td>
<td>Negligible – New programs are addressed in a new Action, discussed below. Therefore, no functional change is made by omitting new programs from this action.</td>
</tr>
<tr>
<td>Action CIRC-9.1.3</td>
<td>New</td>
<td>New employers of 100 or more persons must implement a Travel Demand Management Plan.</td>
<td>Positive – The implementation of such programs will have the net result of reducing single-occupancy vehicle trips, resulting in benefits to air quality from reduced vehicle emissions.</td>
</tr>
</tbody>
</table>

### SECTION 5 – COMMUNITY DESIGN

Modifications to the Introduction, Issues and Considerations, and Community Design Concepts subsections were limited to minor textual changes that do not alter the intent or requirements of the section. As such, these changes do not affect the environmental impacts discussed in the Draft EIR.
5.0 Minor Revisions to the Proposed General Plan

Modifications to Section 5 also included minor textual changes to several goals and policies, including modification of the following:

- Action CD-1.2.1
- Action CD-2.1.3
- Action CD-2.1.4
- Action CD-2.2.1
- Action CD-2.3.3
- Action CD-2.4.1
- Action CD-3.4.1
- Action CD-4.1.1
- Action CD-4.1.2
- Action CD-5.1.1
- Goal CD-6
- Policy CD-6.2

Changes to the goals, policies, and actions listed above constituted minor textual edits and clarifications that had little functional change to those goals, policies, and actions and would therefore not result in any appreciable modification of the environmental impacts of the General Plan Update.

Several additional changes were made to goals, policies, and actions that could, by their nature, cause a modification in the scope or effect of that given feature, resulting in some modification of the expected environmental impact(s) of the General Plan Update. Those specific goals, policies, and actions that fall into this category are discussed below as well as the expected change in environmental impact that would occur as a result of these modifications.

**Table 5.0-4**

<table>
<thead>
<tr>
<th>Goal/Policy/Action</th>
<th>Changed or New</th>
<th>Modification Made</th>
<th>Environmental Effect</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy CD-2.1</td>
<td>Changed</td>
<td>Other open spaces now to be linked to walkable grid street layout.</td>
<td>Negligible to Positive – This change increases the scope of the policy, allowing for additional linkages between pedestrian features and open spaces. This change would have a net benefit on public awareness for open spaces but could also bring more persons into contact with sensitive biological and hydrological resources. However, the true effect of this change is limited and any such effects would be minor.</td>
</tr>
<tr>
<td>Action CD-2.1.1</td>
<td>Changed</td>
<td>Creek access removed from required circulation and access features.</td>
<td>Negligible – Omitting creek access would have little functional change on the pedestrian nature of grid-based street patterns. Therefore, little change in environmental effect would occur.</td>
</tr>
<tr>
<td>Policy CD-2.4</td>
<td>Changed</td>
<td>Policy now includes design of roads, lighting, and landscaping as appropriate methods for protecting viewsheds.</td>
<td>Positive – This change would add to the potential methods that can be utilized to protect viewsheds, resulting in increased effectiveness of the policy and increased protection of viewsheds.</td>
</tr>
<tr>
<td>Action CD-2.4.2</td>
<td>New</td>
<td>Requires low light levels in foothill settings.</td>
<td>Positive – Requiring low lighting in foothill areas will reduce any lighting or glare impacts from development in these areas (see DEIR Section 4.13).</td>
</tr>
<tr>
<td>Goal/Policy/Action</td>
<td>Changed or New</td>
<td>Modification Made</td>
<td>Environmental Effect</td>
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</tr>
<tr>
<td>Action CD-2.4.4</td>
<td>New</td>
<td>Minimize block length in foothill developments.</td>
<td>Positive — Reducing block length would likely result in increased walkability and greater pedestrian safety, as pedestrians are less likely to cross mid-block.</td>
</tr>
<tr>
<td>Action CD-2.4.4</td>
<td>Deleted</td>
<td>Requirement to minimize highly visible or intrusive structures deleted (replaced by new action above).</td>
<td>Negative — Deleting this action removes barriers to such development in foothill areas. However, the new Action CD-2.4.4 as well as the effects of changes to Policy 2.4 and the actions associated with it will offset this negative effect, ensuring that aesthetic impacts would not be worsened.</td>
</tr>
<tr>
<td>Action CD-6.1.1</td>
<td>Changed</td>
<td>The location of two artistic gateway features was changed slightly.</td>
<td>Negligible — Changing the location of such features, but not the total number of features, would not functionally change the effectiveness of such features in improving aesthetics.</td>
</tr>
</tbody>
</table>

**SECTION 6 – DOWNTOWN**

Modifications to the Vision as well as the Introduction, Downtown Vision Illustration and Concepts, and Downtown Land Use Diagram subsections were limited to minor textual changes that do not alter the intent or requirements of the section. As such, these changes do not affect the environmental impacts discussed in the Draft EIR.

The Downtown Vision Illustration and Concepts subsection does include a new subsection describing the illustration and its purpose, but this new subsection provides a clarification and has no functional bearing on the physical requirements of the General Plan Update. Therefore, no change in the environmental impacts of the General Plan Update would occur.

Modifications to Section 6 also included minor textual changes to several goals and policies, including modification of the following:

- Action DT-1.1.1
- Policy DT-1.5
- Action DT-1.5.1
- Action DT-1.5.2
- Policy DT-2.1
- Action DT-2.3.1
- Action DT-2.3.2
- Action DT-3.2.1
- Action DT-3.3.2
- Action DT-3.5.1
- Action DT-3.5.2
- Action DT-5
- Action DT-5.1.2
- Action DT-6.2.2
- Action DT-6.2.4
- Policy DT-3.6
- Policy DT-3.7
- Action DT-3.7.2
- Policy DT-4.1
- Action DT-4.2.2
- Action DT-4.3.1
- Goal DT-5
- Action DT-5.1.2
- Action DT-6.2.2
- Action DT-6.2.4
- Action DT-6.3.1
- Policy DT-7.1
- Action DT-7.1.1
- Action DT-7.1.2
- Policy DT-7.3
- Action DT-8.1.1
- Action DT-8.1.2

Changes to the goals, policies, and actions listed above constituted minor textual edits and clarifications that had little functional change to those goals, policies, and actions and would
therefore not result in any appreciable modification of the environmental impacts of the General Plan Update.

Several additional changes were made to goals, policies, and actions that could, by their nature, cause a modification in the scope or effect of that given feature, resulting in some modification of the expected environmental impact(s) of the General Plan Update. Those specific goals, policies, and actions that fall into this category are discussed below as well as the expected change in environmental impact that would occur as a result of these modifications.

**Table 5.0-5**

Substantive Changes to Downtown Goals, Policies, and Actions and Their Expected Environmental Effects

<table>
<thead>
<tr>
<th>Goal/Policy/Action</th>
<th>Changed or New</th>
<th>Modification Made</th>
<th>Environmental Effect</th>
</tr>
</thead>
<tbody>
<tr>
<td>Action DT-1.3.2</td>
<td>New</td>
<td>City to meet with downtown property owners, businesses, residents, etc., to discuss solutions to Downtown policy issues.</td>
<td>None – The purpose of this group meeting is to support implementation of the Downtown Element. As such, it would have no functional change in the requirements of the General Plan Update and the environmental effects of the element will not likely change.</td>
</tr>
<tr>
<td>Action DT-1.3.3</td>
<td>Changed</td>
<td>Chico Unified School District added to school entities with which the City must consult.</td>
<td>Positive – Providing an additional method for the Chico Unified School District to coordinate with the City would likely result in reduced environmental impacts related to schools and student load (see Section 4.12 of the DEIR).</td>
</tr>
<tr>
<td>Action DT-2.4.1</td>
<td>New</td>
<td>Promote intensified use and reuse of existing above-ground suites.</td>
<td>Positive – Reuse of existing structures typically results in fewer environmental impacts than demolition of an existing building and construction of new spaces.</td>
</tr>
<tr>
<td>Policy DT-3.1</td>
<td>Changed</td>
<td>Sidewalks, open spaces, and other pedestrian amenities added to possible enhancements to the pedestrian environment.</td>
<td>Positive – Increasing the methods through which the pedestrian environment will be enhanced allows for greater flexibility and a greater potential for these enhancements to be implemented, resulting in greater safety for pedestrians as well as enhanced walkability.</td>
</tr>
<tr>
<td>Action DT-3.1.1</td>
<td>Changed</td>
<td>Pedestrian pathways added to features to which the Design Guidelines Manual is applied.</td>
<td>Negligible – Design typically does not affect the environmental impact of such features. However, some benefit may be seen to walkability from application of standards.</td>
</tr>
<tr>
<td>Action DT-5.1.4</td>
<td>Changed</td>
<td>Subsidies for downtown transit uses expanded to residents of downtown.</td>
<td>Positive – By extending transit subsidies for residents, transit ridership will likely be increased and vehicle trips reduced, resulting in reductions in vehicle emissions and traffic loading overall.</td>
</tr>
</tbody>
</table>
SECTION 7 – ECONOMIC DEVELOPMENT

Modifications to the Vision as well as the Introduction and Issues and Considerations subsections were limited to minor textual changes that do not alter the intent or requirements of the section. As such, these changes do not affect the environmental impacts discussed in the Draft EIR.

Modifications to Section 7 also included minor textual changes to several goals and policies, including modification of the following:

- Goal ED-1
- Policy ED-1.2
- Policy ED-1.3
- Action ED-1.4.1
- Action ED-1.4.2
- Action ED-1.4.3
- Action ED-1.4.4
- Action ED-1.4.5
- Action ED-1.4.6
- Goal ED-2
- Policy ED-2.1
- Action ED-2.1.1
- Action ED-2.1.2

Changes to the goals, policies, and actions listed above constituted minor textual edits and clarifications that had little functional change to those goals, policies, and actions and would therefore not result in any appreciable modification of the environmental impacts of the General Plan Update.

Several additional changes were made to goals, policies, and actions that could, by their nature, cause a modification in the scope or effect of that given feature, resulting in some modification of the expected environmental impact(s) of the General Plan Update. Those specific goals, policies, and actions that fall into this category are discussed below as well as the expected change in environmental impact that would occur as a result of these modifications.

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</tr>
</thead>
<tbody>
<tr>
<td>Action ED-1.2.3</td>
<td>Changed</td>
<td>Environmental review added to types of assistance to be granted to shovel-ready sites.</td>
<td>Negligible – Environmental review is a required step regardless of the assistance given to a particular property/project. As such, this change will have little functional effect on environmental impacts.</td>
</tr>
<tr>
<td>Action ED-1.2.5</td>
<td>Changed</td>
<td>Non-profit organizations and CARD are added to potential strategic partnerships.</td>
<td>Negligible – While such partnerships can foster greater economic conditions in the city, the effect on the environment is limited to reduced vehicle miles due to shorter commutes for residents who would work more locally. However, given the geographically isolated location of the city, this benefit would likely be limited.</td>
</tr>
<tr>
<td>Goal/Policy/Action</td>
<td>Changed or New</td>
<td>Modification Made</td>
<td>Environmental Effect</td>
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</tr>
<tr>
<td>Action ED-1.2.6</td>
<td>Deleted</td>
<td>Proposed research park deleted from the General Plan.</td>
<td>Negligible – While a research park would no longer be a planned development in the city following this change, it would not preclude another use from being constructed in that location. Therefore, the environmental effects remain approximately the same.</td>
</tr>
<tr>
<td>Action ED-1.2.8</td>
<td>Deleted</td>
<td>Mandated support for the Chico Municipal Airport deleted.</td>
<td>Negligible – This action was re-codified as Policy ED-1.7. No functional change was made by reclassifying this action as a policy.</td>
</tr>
<tr>
<td>Action ED-1.2.8</td>
<td>New</td>
<td>Promote local agricultural production and distribution.</td>
<td>Positive – Increased local agricultural production and distribution would reduce the number of vehicle miles required to deliver goods and services to local residents, thus incrementally reducing emissions.</td>
</tr>
<tr>
<td>Action ED-1.3.3</td>
<td>New</td>
<td>Update Economic Development Strategy to highlight renewable, recyclable, and local resources.</td>
<td>Positive – The reuse of existing local resources as well as recycling would reduce the number of vehicle miles required to deliver goods and services to local residents, thus incrementally reducing emissions.</td>
</tr>
<tr>
<td>Action ED-1.3.4</td>
<td>New</td>
<td>Conduct outreach to local businesses and development for greater regulatory efficiency.</td>
<td>Negligible – While such actions may make the administration of the City run more efficiently, this would have little functional effect on the environment.</td>
</tr>
<tr>
<td>Policy ED-1.4</td>
<td>Changed</td>
<td>Base-level employment goals and long-term sustainability added to considerations for allocating public funds.</td>
<td>Negligible – Sustainability in this case refers to longevity and not the concepts of sustainable development. As such, this policy would have limited effect on the environment other than some minor reductions in impacts that would occur if businesses left the city and vacant properties were either demolished or renovated for new uses.</td>
</tr>
<tr>
<td>Action ED-1.4.5</td>
<td>New</td>
<td>Invest local resources to retain, expand, and add new base-level employers in Chico.</td>
<td>Negligible to Positive – More employers in the city would reduce the potential for residents to travel outside the city for work, resulting in fewer vehicle miles traveled over all and thus reduced vehicle emissions. However, given the city’s isolated geographic location, this benefit would be limited.</td>
</tr>
<tr>
<td>Action ED-1.4.6</td>
<td>New</td>
<td>Use technology to support City economic goals.</td>
<td>Negligible – Some very limited benefits may be seen in the realm of reduced paper and other physical resource use which would reduce the amount of solid waste handled in the city. However, this would be severely limited and would thus not have a significant environmental impact.</td>
</tr>
</tbody>
</table>
### 5.0 Minor Revisions to the Proposed General Plan

<table>
<thead>
<tr>
<th>Goal/Policy/Action</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Action ED-1.4.7</td>
<td>New</td>
<td>Attract and promote regional and other major sporting events.</td>
<td>Negligible – While sports events can have an economic benefit, economic impacts are not considered environmental impacts.</td>
</tr>
<tr>
<td>Policy ED-1.7</td>
<td>New</td>
<td>Support operation of Chico Municipal Airport.</td>
<td>See Action ED-1.2.8 above.</td>
</tr>
<tr>
<td>Action ED-1.8.1</td>
<td>New</td>
<td>Conduct a regional economic development summit.</td>
<td>None – While such events can have an economic benefit, economic impacts are not considered environmental impacts.</td>
</tr>
<tr>
<td>Action ED-1.8.2</td>
<td>New</td>
<td>Encourage increased State/Silver Dollar Fair Board use of the fairgrounds.</td>
<td>None – While such events can have an economic benefit, economic impacts are not considered environmental impacts.</td>
</tr>
<tr>
<td>Policy ED-1.9</td>
<td>New</td>
<td>Encourage residents and visitors to support local businesses.</td>
<td>Negligible – While such actions can have an economic benefit, economic impacts are not considered environmental impacts.</td>
</tr>
<tr>
<td>Action ED-1.9.1</td>
<td>New</td>
<td>Implement a “buy local” campaign.</td>
<td>See Policy ED-1.9 above.</td>
</tr>
<tr>
<td>Policy ED-2.1</td>
<td>Deleted</td>
<td>Maintenance of Chico’s prominence as the regional retail center deleted.</td>
<td>Negligible – While this policy might have had an economic benefit, and while its removal may have a similar negative impact, economic impacts are not considered environmental impacts.</td>
</tr>
<tr>
<td>Action ED-2.1.1</td>
<td>Deleted</td>
<td>Mandate to ensure an adequate supply of retail land deleted.</td>
<td>See Policy ED-2.1 above.</td>
</tr>
<tr>
<td>Policy ED-3.1</td>
<td>Changed</td>
<td>Projects that support infill, mixed-use, and redevelopment added to consideration for Opportunity Sites.</td>
<td>Negligible to Positive – This change would result in a greater potential for Opportunity Sites to include these types of features, reducing the construction of new structures, increasing the reuse of old structures, and limiting sprawl.</td>
</tr>
</tbody>
</table>

**Note:**

1. Since Policy ED-2.1 was deleted, remaining policies and actions under Goal ED-2 were renumbered accordingly.

### Section 9 – Parks, Public Facilities, and Services

Modifications to the Vision as well as the Issues and Considerations and Parks, Public Facilities, and Services Context subsections were limited to minor textual changes that do not alter the intent or requirements of the section. As such, these changes do not affect the environmental impacts discussed in the Draft EIR. Table PPFS-2 was modified to include calculations for the acreage and number of parks needed to meet the build-out population. However, these calculations do not change the requirements of the element and thus have no environmental effect.

Modifications to Section 9 also included minor textual changes to several goals and policies, including modification of the following:

- Action PPFS-1.1.9
- Action PPFS-2.1.2
- Action PPFS-2.1.3
- Action PPFS-4.2.1
- Action PPFS-4.2.3
- Action PPFS-5.1.1
- Action PPFS-5.1.2
- Action PPFS-5.3.1
- Action PPFS-5.3.2
5.0 MINOR REVISIONS TO THE PROPOSED GENERAL PLAN

- Policy PPFS-5.4
- Policy PPFS-6.2
- Action PPFS-6.3.1
- Goal PPFS-7
- Policy PPFS-7.1
- Action PPFS-7.1.2
- Action PPFS-8.1.1
- Action PPFS-8.1.4
- Action PPFS-8.1.6

Changes to the goals, policies, and actions listed above constituted minor textual edits and clarifications that had little functional change to those goals, policies, and actions and would therefore not result in any appreciable modification of the environmental impacts of the General Plan Update.

Several additional changes were made to goals, policies, and actions that could, by their nature, cause a modification in the scope or effect of that given feature, resulting in some modification of the expected environmental impact(s) of the General Plan Update. Those specific goals, policies, and actions that fall into this category are discussed below as well as the expected change in environmental impact that would occur as a result of these modifications.

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<thead>
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</tr>
</thead>
<tbody>
<tr>
<td>Policy PPFS-2.1</td>
<td>Changed</td>
<td>Habitat protection added to potential uses for greenways and other open spaces for public use.</td>
<td>Positive – Adding habitat protection to the use of greenways and open space for public use will ensure that this use will likely reduce any impacts to habitats within those areas.</td>
</tr>
<tr>
<td>Action PPFS-2.1.4</td>
<td>Changed</td>
<td>Non-profit organizations also to be consulted during the environmental review process.</td>
<td>Negligible – Consultation with all interested parties and responsible agencies is a required part of CEQA review. This change merely restates this requirement, resulting in little actual change to environmental impacts.</td>
</tr>
<tr>
<td>Action PPFS-3.1.1</td>
<td>Changed</td>
<td>Promotion of walking, biking, transit, or carpooling to schools added.</td>
<td>Positive – Greater uses of these modes of transportation would reduce the number of vehicles taking children to school, resulting in fewer vehicle emissions.</td>
</tr>
<tr>
<td>Policy PPFS-5.1</td>
<td>Changed</td>
<td>Tehama aquifer also to be protected under the Chico Planning Area.</td>
<td>Positive – By clarifying that there are two main aquifers under the city, not just one, the potential for greater protection of these aquifers is created.</td>
</tr>
<tr>
<td>Action PPFS-5.1.4</td>
<td>New</td>
<td>Include development standards that protect groundwater recharge areas.</td>
<td>Positive – Protection of recharge areas would help reduce drawdown of the aquifer and the resultant need for new and deeper wells.</td>
</tr>
<tr>
<td>Goal/Policy/Action</td>
<td>Changed or New</td>
<td>Modification Made</td>
<td>Environmental Effect</td>
</tr>
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</tr>
<tr>
<td><strong>Action PPFS-5.4.2</strong></td>
<td>New</td>
<td>Replace water-intensive City landscaping and irrigation systems with drought-tolerant and water-efficient systems.</td>
<td>Positive – Increasing the use of drought-tolerant landscaping and efficient irrigation can reduce the water demand of City properties, resulting in less water use overall, reduced groundwater use, and other similar benefits.</td>
</tr>
<tr>
<td><strong>Goal PPFS-6</strong></td>
<td>Changed</td>
<td>Natural aquifers added to systems to be protected by a comprehensive stormwater management system.</td>
<td>Positive – Consideration of the effect of stormwater on aquifers would decrease potential negative impacts on the aquifer.</td>
</tr>
<tr>
<td><strong>Action PPFS-7.1.4</strong></td>
<td>Deleted</td>
<td>Exploration of a Cultural and Performing Arts Center deleted.</td>
<td>Negligible – Social impacts are not considered environmental impacts.</td>
</tr>
<tr>
<td><strong>Policy PPFS-7.2</strong></td>
<td>New</td>
<td>Support improved health and social services.</td>
<td>Negligible to Positive – Implementation of this policy could result in greater public health, though its effect is mostly administrative rather than physical.</td>
</tr>
<tr>
<td><strong>Action PPFS-8.1.5</strong></td>
<td>New</td>
<td>Provide recycling bins and collection on City property.</td>
<td>Positive – Making recycling bins available on City property would incrementally reduce the amount of solid waste sent to landfills.</td>
</tr>
<tr>
<td><strong>Action PPFS-8.1.7</strong></td>
<td>New</td>
<td>Amend the Municipal Code to apply solid waste and recycling standards to commercial and industrial customers.</td>
<td>Positive – This new action would expand the scope of the City’s current recycling/solid waste requirements, resulting in less solid waste sent to landfills.</td>
</tr>
</tbody>
</table>

**SECTION 10 – OPEN SPACE AND ENVIRONMENT**

Modifications to the Vision as well as the Introduction and Issues and Considerations subsections were limited to minor textual changes that do not alter the intent or requirements of the section. As such, these changes do not affect the environmental impacts discussed in the Draft EIR.

Modifications to Section 10 also included minor textual changes to several goals and policies, including modification of the following:

- Policy OS-1.1  
- Action OS-1.1.2  
- Action OS-1.1.3  
- Action OS-1.1.4  
- Action OS-1.2.1  
- Goal OS-2  
- Policy OS-2.1  
- Action OS-2.1.1  
- Action OS-2.1.2  
- Policy OS-2.3  
- Action OS-2.3.2  
- Action OS-2.3.3  
- Action OS-2.3.4  
- Action OS-3.1.1  
- Action OS-3.1.2  
- Action OS-3.1.3  
- Action OS-3.2.1  
- Action OS-3.2.2  
- Action OS-3.2.3  
- Action OS-3.2.4  
- Action OS-3.3.1  
- Action OS-3.3.2  
- Action OS-3.3.3  
- Action OS-3.3.4  
- Policy OS-4.1  
- Action OS-4.1.1  
- Action OS-4.1.2  
- Action OS-4.1.3  
- Policy OS-5.1  
- Action OS-5.2  
- Action OS-5.3  
- Action OS-5.4  
- Policy OS-6.1  
- Action OS-6.1.1
Changes to the goals, policies, and actions listed above constituted minor textual edits and clarifications that had little functional change to those goals, policies, and actions and would therefore not result in any appreciable modification of the environmental impacts of the General Plan Update.

Several additional changes were made to goals, policies, and actions that could, by their nature, cause a modification in the scope or effect of that given feature, resulting in some modification of the expected environmental impact(s) of the General Plan Update. Those specific goals, policies, and actions that fall into this category are discussed below as well as the expected change in environmental impact that would occur as a result of these modifications.

**TABLE 5.0-8**

**SUBSTANTIVE CHANGES TO OPEN SPACE AND ENVIRONMENT GOALS, POLICIES, AND ACTIONS AND THEIR EXPECTED ENVIRONMENTAL EFFECTS**

<table>
<thead>
<tr>
<th>Goal/Policy/Action</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Action OS-1.1.1</td>
<td>Changed</td>
<td>Areas that contain sensitive habitat and species also to be protected from development.</td>
<td>Positive – By expanding the scope of this action beyond just open space, the potential for protection of sensitive species or habitats is increased.</td>
</tr>
<tr>
<td>Action OS-1.1.5</td>
<td>New</td>
<td>Remove non-native species in Bidwell Park and City greenways.</td>
<td>Positive – The removal of non-native invasive species will not only add potential habitat for native species, but will also prevent the spread of these non-native species to sensitive habitats.</td>
</tr>
<tr>
<td>Policy OS-1.3</td>
<td>New</td>
<td>Reduce excessive nighttime light and glare.</td>
<td>Positive – Implementation of this goal as well as its two actions would reduce impacts due to light and glare (see Section 4.13, Impact 4.13.4, of the DEIR).</td>
</tr>
<tr>
<td>Action OS-1.3.1</td>
<td>New</td>
<td>Consider adoption of a dark sky ordinance.</td>
<td>See Policy OS-1.3 above.</td>
</tr>
<tr>
<td>Action OS-1.3.22</td>
<td>New</td>
<td>Seek community cooperation to reduce existing light pollution.</td>
<td>See Policy OS-1.3 above.</td>
</tr>
<tr>
<td>Action OS-2.2.2</td>
<td>New</td>
<td>Expand the greenway system.</td>
<td>Positive – Expansion of greenways and open space can have beneficial impacts to habitats and species as well as provide recreational opportunities and other potential benefits to public health.</td>
</tr>
<tr>
<td>Action OS-2.4.2</td>
<td>New</td>
<td>Update the Design Guidelines to address viewshed issues in the foothills.</td>
<td>Positive – Updating design guidelines in this manner would potentially reduce impacts to viewsheds from development (see Section 4.13 of the DEIR).</td>
</tr>
<tr>
<td>Action OS-3.1.3</td>
<td>New</td>
<td>Continue enforcement of illegal discharges to Chico’s creeks.</td>
<td>Negligible – As this policy mandates continuation of a program already in place, no further environmental benefit beyond that already seen as a result of the program would occur.</td>
</tr>
<tr>
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</tr>
<tr>
<td><strong>Action OS-3.1.7</strong></td>
<td>New</td>
<td>Improve operation and maintenance of the Five-Mile flood control system.</td>
<td>Positive – Such an action would not only reduce potential flooding impacts in the event of a severe storm, but improved maintenance would result in improvements in water quality, management of sediment, and improvements to fish habitats.</td>
</tr>
<tr>
<td><strong>Action OS-3.2.1</strong></td>
<td>Changed</td>
<td>Impacts to groundwater recharge areas can also be avoided through open space preservation and runoff management.</td>
<td>Positive – This change increases the available methods allowed to protect groundwater recharge areas, resulting in a greater likelihood of success for such efforts.</td>
</tr>
<tr>
<td><strong>Action OS-3.2.2</strong></td>
<td>New</td>
<td>Identify and map groundwater recharge areas.</td>
<td>Negligible – While detailed mapping will enhance the efforts to protect groundwater recharge areas, it would not change the actual physical requirements of the General Plan for these areas.</td>
</tr>
<tr>
<td><strong>Action OS-3.2.5</strong></td>
<td>New</td>
<td>Oppose regional sales and transfers of local groundwater.</td>
<td>Negligible – This new action concerns local groundwater entitlements. However, hydrological connection between groundwater used in a given location and its final destination once used is tenuous and no direct connection is proven.</td>
</tr>
<tr>
<td><strong>Action OS-3.3.5</strong></td>
<td>New</td>
<td>Enforce state water conservation requirements.</td>
<td>Negligible – While this action may enhance local enforcement of state requirements, it would not affect the actual physical requirements of those regulations.</td>
</tr>
<tr>
<td><strong>Action OS-4.1.5</strong></td>
<td>Changed</td>
<td>Enforce no-burn regulations as well as the residential leaf pick-up program.</td>
<td>Negligible – While this action may enhance local enforcement of no-burn regulations, it does not establish any new physical restrictions on burning.</td>
</tr>
<tr>
<td><strong>Action OS-4.1.6</strong></td>
<td>New</td>
<td>Provide a well-connected circulation system with complete streets features.</td>
<td>Positive – Complete streets concepts, such as enhanced transit and pedestrian facilities and traffic calming techniques, have benefits for both traffic congestion and air quality emissions.</td>
</tr>
<tr>
<td><strong>Policy OS-4.3</strong></td>
<td>Changed</td>
<td>Not only provide a Climate Action Plan, but also update it periodically.</td>
<td>Positive – As greenhouse gas planning is an ever-developing field, updating the Climate Action Plan periodically will ensure that best available science is applied to the City’s Climate Action Plan.</td>
</tr>
<tr>
<td><strong>Action OS-5.2.1</strong></td>
<td>Changed</td>
<td>Explore public uses in agricultural buffers.</td>
<td>Negligible – Public uses in agricultural buffers will likely have no effect on agricultural resources and will have no greater environmental effect during installation than other features allowed in such buffers (such as roadways).</td>
</tr>
</tbody>
</table>
5.0 MINOR REVISIONS TO THE PROPOSED GENERAL PLAN

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<tbody>
<tr>
<td>Action OS-6.1.3</td>
<td>New</td>
<td>Consider a tree planting program.</td>
<td>Negligible – While tree planting has proven benefits to air quality as well as public health, a requirement to consider such a program is not a requirement to enact a program. Therefore, the benefit cannot be assumed to occur.</td>
</tr>
</tbody>
</table>

SECTION 11 – CULTURAL RESOURCES AND HISTORIC PRESERVATION

Modifications to the Introduction and Regulatory Context subsections were limited to minor textual changes that do not alter the intent or requirements of the section. Included in these modifications was a brief discussion of the role of CEQA; however, no changes to the requirements of the element were included. As such, these changes do not affect the environmental impacts discussed in the Draft EIR.

Modifications to Section 11 also included minor textual changes to several goals and policies, including modification of the following:

- Goal CRHP-1
- Policy CRHP-1.1
- Action CRHP-1.1.3
- Action CRHP-1.1.6
- Policy CRHP-2.3
- Goal CRHP-3
- Action CRHP-3.1.5

Changes to the goals, policies, and actions listed above constituted minor textual edits and clarifications that had little functional change to those goals, policies, and actions and would therefore not result in any appreciable modification of the environmental impacts of the General Plan Update.

Several additional changes were made to goals, policies, and actions that could, by their nature, cause a modification in the scope or effect of that given feature, resulting in some modification of the expected environmental impact(s) of the General Plan Update. Those specific goals, policies, and actions that fall into this category are discussed below as well as the expected change in environmental impact that would occur as a result of these modifications.

<table>
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<tbody>
<tr>
<td>Action CRHP-1.1.10</td>
<td>Changed</td>
<td>City to use the California Historical Resources Information System to identify qualified cultural consultants, not an internal City process. Also require consultants to meet the minimum standards of the Secretary of the Interior.</td>
<td>Positive – This change would strengthen the qualifications required of a cultural consultant in the City, ensuring greater potential protection of cultural resources during the planning process.</td>
</tr>
<tr>
<td>Action CRHP-2.4.3</td>
<td>New</td>
<td>Implement the Diversity Action plan.</td>
<td>Negligible – Diversity is a social function and thus not an environmental effect.</td>
</tr>
</tbody>
</table>
5.0 MINOR REVISIONS TO THE PROPOSED GENERAL PLAN

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<tbody>
<tr>
<td>Action CRHP-3.1.2</td>
<td>New</td>
<td>Consult with the Northeast Information Center during preparation of a Cultural Resources Management Plan.</td>
<td>Negligible to Positive – Increased coordination between local agencies and the City can have a positive effect on cultural resources protection. However, consultation with such entities is already a requirement of CEQA and state law. Therefore, the effect of this action is limited.</td>
</tr>
<tr>
<td>Action CRHP-3.1.3</td>
<td>Changed</td>
<td>Identical changes as those shown for Action CRHP-1.1.10 above.</td>
<td>See Action CRHP-1.1.10 above.</td>
</tr>
<tr>
<td>Action CRHP-3.1.7</td>
<td>New</td>
<td>Continue to support education conferences on Historic Preservation and Native American Resource Preservation.</td>
<td>Negligible to Positive – Public education can increase awareness of cultural resources. However, as these conferences are already held and this action would simply continue programs already undertaken by the City, little change from the existing cultural setting is expected.</td>
</tr>
</tbody>
</table>

SECTION 12 – SAFETY

Modifications to the Vision as well as the Issues and Considerations and Safety Context subsections were limited to minor textual changes that do not alter the intent or requirements of the section. As such, these changes do not affect the environmental impacts discussed in the Draft EIR.
4.0 MINOR REVISIONS TO THE DRAFT EIR

Modifications to Section 12 also included minor textual changes to several goals and policies, including modification of the following:

- Action S-1.1.2
- Goal S-2
- Policy S-2.1
- Action S-2.1.2
- Action S-2.1.3
- Action S-2.1.4
- Policy S-3.1
- Action S-4.1.1
- Policy S-4.3
- Action S-5.1.1
- Action S-5.3.1
- Action S-5.4.1
- Action S-5.4.3
- Action S-5.5.1
- Action S-5.4.3
- Policy S-7.1
- Goal S-8

Changes to the goals, policies, and actions listed above constituted minor textual edits and clarifications that had little functional change to those goals, policies, and actions and would therefore not result in any appreciable modification of the environmental impacts of the General Plan Update.

Several additional changes were made to goals, policies, and actions that could, by their nature, cause a modification in the scope or effect of that given feature, resulting in some modification of the expected environmental impact(s) of the General Plan Update. Those specific goals, policies, and actions that fall into this category are discussed below as well as the expected change in environmental impact that would occur as a result of these modifications.

**TABLE 5.0-10**
SUBSTANTIVE CHANGES TO SAFETY GOALS, POLICIES, AND ACTIONS AND THEIR EXPECTED ENVIRONMENTAL EFFECTS

<table>
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<tr>
<td>Policy S-1.2</td>
<td>New</td>
<td>Support public education, adaptation, and emergency response services in response to the long-term effects of climate change.</td>
<td><strong>Positive</strong> – Addition of this policy provides a framework through which City emergency response will consider the effects of climate change, ensuring that adequate planning is undertaken for events that could occur as climate change progresses.</td>
</tr>
<tr>
<td>Action S-2.1.5</td>
<td>Changed</td>
<td>Inclusion of state flood hazard data on the City’s flood hazard maps deleted.</td>
<td><strong>Negligible</strong> – Deleting the requirement for state flood hazard data on the City’s flood hazard maps would not preclude the inclusion of Federal Emergency Management Agency (FEMA) flood maps or any other similar requirement of the General Plan Update for flood hazard mitigation, limiting the physical effect of deleting this action.</td>
</tr>
<tr>
<td>Goal/Policy/Action</td>
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</tr>
<tr>
<td>Action S-4.3.5</td>
<td>Changed</td>
<td>Consideration of sprinkler ordinance limited to nonresidential structures.</td>
<td>Negligible – As this action only mandates consideration of a sprinkler ordinance, not the actual adoption of such an ordinance, it is not certain that such an ordinance would be adopted. Furthermore, it is unlikely any sprinkler ordinance, following public process, would require new residential structures to include sprinklers. As such, the physical impact of this change on fire hazards is limited.</td>
</tr>
<tr>
<td>Action S-5.1.2</td>
<td>New</td>
<td>Maintain adequate police staffing.</td>
<td>Negligible – While this action would require adequate staffing, the environmental effects of increases in staffing as a result of the General Plan Update were addressed in the DEIR (see Section 4.12, Impact 4.12.2.1). As the DEIR assumed the increase, the method for any staffing increase is irrelevant.</td>
</tr>
<tr>
<td>Action S-5.5.2</td>
<td>Deleted</td>
<td>Adoption of a security design ordinance deleted.</td>
<td>Negligible – Inclusion of security design principles is already required by Policy S-5.5 and Action S-5.5.1, as well as existing policies and actions in other elements of the General Plan Update. As such, the omission of a Security Design Ordinance would have little physical effect on safety design in new development in the city.</td>
</tr>
<tr>
<td>Action S-7.1.2</td>
<td>Changed</td>
<td>Union Pacific Railroad added to agencies to develop and disseminate education materials on railroad crossing hazards.</td>
<td>Positive – Including Union Pacific in development of educational materials should enhance the effectiveness and accuracy of such materials, incrementally increasing safety awareness.</td>
</tr>
<tr>
<td>Policy S-8.2</td>
<td>New</td>
<td>Reduce the use of hazardous and toxic materials by City operations.</td>
<td>Positive – By reducing the amount of such materials used by the City, the amount transported to, stored in, and used in Chico would be reduced, incrementally reducing safety and health hazards of such activities.</td>
</tr>
</tbody>
</table>

**SECTION 13 – NOISE**

Modifications to the Vision as well as the Introduction and Issues and Considerations subsections were limited to minor textual changes that do not alter the intent or requirements of the section. As such, these changes do not affect the environmental impacts discussed in the Draft EIR.

The discussion of airport noise in regard to the ALUCP and the ALUC was updated according to the changes outlined above for Section 3, Land Use, above. As with the land use ramifications, the modified discussion in the Noise Element clarified that consistency with the ALUC and ALUCP have been established, reducing potential noise impacts to sensitive receptors and thus having a beneficial environmental impact over the previous version of the General Plan Update.
5.0 MINOR REVISIONS TO THE PROPOSED GENERAL PLAN

Also added to the Issues and Considerations subsection was language describing the noise generation of California State University, Chico. However, this additional text did not change the function or intent of the General Plan Update and thus no change in environmental effect is expected.

Modifications to Section 13 also included minor textual changes to several goals and policies, including modification of the following:

- Policy N-1.5
- Action N-2.2.1
- Action N-2.2.2

Changes to the goals, policies, and actions listed above constituted minor textual edits and clarifications that had little functional change to those goals, policies, and actions and would therefore not result in any appreciable modification of the environmental impacts of the General Plan Update.

Several additional changes were made to goals, policies, and actions that could, by their nature, cause a modification in the scope or effect of that given feature, resulting in some modification of the expected environmental impact(s) of the General Plan Update. Those specific goals, policies, and actions that fall into this category are discussed below as well as the expected change in environmental impact that would occur as a result of these modifications.

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</tr>
</thead>
<tbody>
<tr>
<td>Action N-2.1.1</td>
<td>Changed</td>
<td>Berms as a potential method for noise mitigation deleted.</td>
<td>Negligible – The action still includes allowance for “other methods,” which would allow berms if the situation called for it. As such, there is little functional change in the requirements of the action.</td>
</tr>
<tr>
<td>Action N-2.2.3</td>
<td>Changed</td>
<td>Noise-reducing pavement and speed reductions added to features that could be used to mitigate noise from state highways.</td>
<td>Negligible – While calling out these specific methods may increase awareness of these types of methods, the action does not require their use. Therefore, the physical effect of the action remains the same.</td>
</tr>
</tbody>
</table>

5.3 CEQA RAMIFICATIONS OF GENERAL PLAN UPDATE MODIFICATIONS

CEQA Guidelines, Section 15088.5 discusses the requirements imposed on a lead agency in the event that new information or changes to the proposed project occur following release of the Draft EIR and prior to certification of the EIR. According to Section 15088.5, an EIR must be recirculated for public comment in the event that significant new information is added to the EIR. According to Section 15088.5(a), significant new information requiring recirculation includes:

1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it.

4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

The modifications to the General Plan Update discussed above do not present a new project alternative, nor are any new mitigation measures presented. Likewise, sufficient evidence does not exist from comments received on the Draft EIR and the whole of the public record that the Draft EIR is in any way fundamentally and basically inadequate.

In regard to changes in environmental impacts, refer to Tables 5.0-1 through 5.0-10 above. As shown in those tables and the discussion in Section 5.2 above, none of the changes made to the General Plan Update following release of the Draft EIR for public comment would result in any appreciable change in environmental impacts. None of the impacts identified in the Draft EIR would be more significant than what was originally stated, nor would any new impacts occur that were previously unidentified. As such, the EIR need not be recirculated, pursuant to the requirements of CEQA Guidelines Section 15088.5(a).