

## 6. Unavoidable Impacts, Irreversible Changes, and Growth-Inducing Impacts

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### 6.1 SIGNIFICANT UNAVOIDABLE AND ADVERSE IMPACTS

At the end of Chapter 1, *Executive Summary*, is a table that summarizes the impacts, mitigation measures, and levels of significance before and after mitigation. Mitigation measures would reduce the level of impact, but the following impacts would remain significant, unavoidable, and adverse after mitigation measures are applied:

#### Agriculture and Forestry Resources

- **AG-1:** The project would convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.
- **AG-2:** The project would conflict with existing zoning for agricultural use, or a Williamson Act contract.
- **AG-4:** The project would result in loss of forest land or conversion of forest land to non-forest use.

#### Air Quality

- **AQ-1:** Implementation of General Plan 2040 and URCP would conflict with or obstruct implementation of the applicable air quality plan.
- **AQ-2:** Construction of the proposed project would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.
- **AQ-3:** Operation of the proposed project would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.
- **AQ-5:** Operation of non-permitted sources accommodated under General Plan 2040 would expose sensitive receptors to substantial pollutant concentrations of toxic air contaminants.
- **AQ-6:** General Plan 2040 would result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.
- **AQ-7:** The proposed project, in combination with past, present, and reasonably foreseeable projects, would result in significant cumulative impacts with respect to air quality.

## CEQA MANDATED SECTIONS

### Biological Resources

- **BIO-7:** The proposed project, in combination with past, present, and reasonably foreseeable projects, would not result in less-than-significant cumulative impacts with respect to biological resources.

### Greenhouse Gas Emissions

- **GHG-1:** The project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant effect on the environment.

### Noise

- **NOI-1:** Implementation of the project would result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, state, or federal standards.
- **NOI-4:** Buildout of the project, in combination with past, present, and reasonably foreseeable projects, would result in potentially significant cumulative impacts with respect to noise.

### Wildfire

- **WILD-2:** If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, the project, due to slope, prevailing winds, and other factors, could exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of wildfire.

## 6.2 SIGNIFICANT IRREVERSIBLE CHANGES DUE TO THE PROPOSED PROJECT

Section 15126.2(c) of the California Environmental Quality Act (CEQA) Guidelines requires an environmental impact report (EIR) to discuss the extent to which the proposed project would commit nonrenewable resources to uses that future generations would probably be unable to reverse. Specifically, the CEQA Guidelines state:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highways improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

**CEQA MANDATED SECTIONS**

The following are the significant irreversible changes that would be caused by the proposed project, should it be implemented:

- Implementation of the proposed project would include construction activities that would entail the commitment of nonrenewable and/or slowly renewable energy resources; human resources; and natural resources such as lumber and other forest products, sand and gravel, asphalt, steel, copper, lead, other metals, water, and fossil fuels. Operation of the proposed project would require the use of natural gas and electricity, petroleum-based fuels, fossil fuels, and water. The commitment of resources required for the construction and operation of the proposed project would limit the availability of such resources for future generations or for other uses during the life of the project.
- An increased commitment of social services and public maintenance services (e.g., police, fire, schools, libraries, and sewer and water services) would also be required. The energy and social service commitments would be long-term obligations in view of the low likelihood of returning the land to its original condition once it has been developed.
- An increase in vehicle trips would accompany project-related population growth. Over the long term, emissions associated with such vehicle trips would continue to contribute to the Sacramento Valley Air Basin's nonattainment designation for ozone (O<sub>3</sub>) and particulate matter (PM<sub>10</sub>) under the California and National Ambient Air Quality Standards (AAQS), and nonattainment for nitrogen dioxide (NO<sub>2</sub>) under the California AAQS.
- The visual character of the General Plan Area would be altered by the construction of new developments and redevelopment. Additional landscaping, grading, and construction of the General Plan Area would also contribute to an altered visual character of the existing area. This would result in a permanent change in the character of the General Plan Area and on- and off-site views in the project's vicinity.

Given the low likelihood that the land in the General Plan Area would revert to its original form, the proposed project would generally commit future generations to these environmental changes.

### **6.3 GROWTH-INDUCING IMPACTS OF THE PROJECT**

Pursuant to Sections 15126(d) and 15126.2(d) of the CEQA Guidelines, this section is provided to examine ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Also required is an assessment of other projects that would foster other activities that could affect the environment, individually or cumulatively. To address this issue, potential growth-inducing effects will be examined through analysis of the following questions:

- Would this project remove obstacles to growth, e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development?
- Would this project result in the need to expand one or more public services to maintain desired levels of service?

## **CEQA MANDATED SECTIONS**

- Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?
- Would approval of this project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?

Please note that growth-inducing effects are not to be construed as necessarily beneficial, detrimental, or of little significance to the environment. This issue is presented to provide additional information on ways in which this project could contribute to significant changes in the environment, beyond the direct consequences of developing the land use concept examined in the preceding sections of this EIR.

### **Would this project remove obstacles to growth, e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development?**

The proposed General Plan encourages growth in areas of the county either currently planned to accommodate development or planned to expand on existing development. The proposed General Plan would increase employment opportunities so that residents can live and work in the county. Reducing the need to commute outside the county will reduce vehicle miles travelled, thereby reducing greenhouse gas emissions. Because the growth is directed to areas already developed, it is not anticipated that major new infrastructure will be needed.

The county is choosing to accommodate both the assigned regional housing need and expansion of employment in this General Plan anticipating that planning for and accepting growth will reduce pressure to develop other land in the surrounding area. The county hopes to streamline approval of projects that are consistent with the General Plan by tiering from this EIR. Nonetheless, future development will need to demonstrate consistency with the General Plan and that project-specific environmental impacts have been addressed. As this EIR addresses the countywide impacts associated with future growth, and site-specific analysis will need to be prepared to demonstrate compliance, subsequent impacts would not significantly affect the environment. The proposed project does not approve the construction of specific development projects and would largely accommodate growth based on market conditions. However, in the Upper Ridge Community Plan, it would allow increased development intensity and a more inclusive mix of land uses compared to existing conditions. Therefore, the proposed project removes regulatory obstacles to growth and is considered to be growth inducing.

### **Would this project result in the need to expand one or more public services to maintain desired levels of service?**

Over time, the County anticipates the need to expand services to meet the needs of growth envisioned in the General Plan. An increase in development would require an increased commitment to public services that would be considered a long-term commitment to maintain a desired level of service. This is considered a growth-inducing impact. There are several mechanisms in place to ensure there is adequate funding for expansion, such as annual budgets, development impact fees, and coordination with local and regional agencies. The growth anticipated in this General Plan is focused in areas of the county where development is already planned or served by public services.

## CEQA MANDATED SECTIONS

### **Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?**

Development consistent with the General Plan may have significant impacts on the existing environment. Even though growth is directed to the focus areas that have already been graded or built up, development outside of the focus areas in the county may impact sensitive biological resources. Impacts may also occur to historic resources, including historic landscape, and tribal cultural resources, depending on the location of the development. Between the standard conditions of approval, existing County ordinances, and procedures such as tribal consultation, these impacts can either be reduced to less than significant or require preparation of a project-specific EIR. Although the proposed project would have a direct growth-inducing effect, indirect growth-inducing effects would be minimized due to the balance of land uses in the proposed project.

### **Would approval of this project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?**

Approval of the proposed project would not set a precedent that could encourage and facilitate other activities that could significantly affect the environment. Cities and counties in California periodically update their general plans pursuant to California Government Code Sections 65300 et seq.

As discussed in Chapter 3, *Project Description*, the proposed project consists of the preparation of the Butte County General Plan Update, which includes revisions to the six updated elements: Circulation Element, Environmental Justice Element (New Element), Health and Safety Element, Housing Element, Land Use Element, and Water Resources Element. Other elements of the current General Plan will be revised to ensure consistency with the updated elements: Area and Neighborhood Plans Element, Agricultural Element, Conservation and Open Space Element, Economic Development Element, and Public Facilities and Services Element. The purpose of the proposed General Plan Update is to provide a framework in which the growth can be managed and tailored to suit the needs of the community and the surrounding area. Pressures to develop in the surrounding cities may derive from regional economic conditions and market demands for housing, commercial, office, and industrial land uses that may be directly or indirectly influenced by the proposed project.

Buildout projections for the proposed project are based on the theoretical buildout (dwelling units, population, nonresidential square footage, and employment) of each land use designation, which are calculated using the range of allowable densities. Buildout projections for the proposed project are shown in Table 3-3, *Unincorporated County Buildout Projections*, in Chapter 3, *Project Description*. As shown in Table 3-3, Butte County is projected to house an estimated 63,421 residents by 2040. This is a 28 percent increase from 2020. Additionally, 25,568 housing units, 9,860 employees, 2.04 million square feet of retail and office space, and 2.65 million square feet of industrial are projected for 2040. The majority of the new residential units are projected to develop within the spheres of influence (SOIs) of the incorporated municipalities and in existing unincorporated communities.

## **CEQA MANDATED SECTIONS**

Although the proposed project does not include approval of physical development, it creates additional development capacity in the Planning Area compared to existing conditions. Furthermore, development projects would be induced more by market demands than by new development capacity created by land use changes included in the proposed Land Use Map. However, because approval of the proposed project would ultimately result in subsequent projects that would have their own environmental impacts—including potentially significant impacts—the proposed project is a precedent-setting and growth-inducing action.