

7. Alternatives to the Proposed Project

7.1 INTRODUCTION

7.1.1 PURPOSE AND SCOPE

The California Environmental Quality Act (CEQA) requires that an environmental impact report (EIR) include a discussion of reasonable project alternatives that would “feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives” (CEQA Guidelines Section 15126.6[a]). As required by CEQA, this chapter identifies and evaluates potential alternatives to the proposed project.

Section 15126.6 of the CEQA Guidelines explains the foundation and legal requirements for the alternatives analysis in an EIR. Key provisions are:

- “[T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” (CEQA Guidelines, Section 15126.6[b])
- “The specific alternative of ‘no project’ shall also be evaluated along with its impact.” (CEQA Guidelines, Section 15126.6[e][1])
- “The no project analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” (CEQA Guidelines, Section 15126.6[e][2])
- “The range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.” (CEQA Guidelines, Section 15126.6[f])
- “Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries..., and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent).” (CEQA Guidelines, Section 15126.6[f][1])

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- “Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.” (CEQA Guidelines, Section 15126.6[f][2][A])
- “An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.” (CEQA Guidelines, Section 15126.6[f][3])

For each development alternative, this analysis:

- Describes the alternative.
- Analyzes the impact of the alternative as compared to the proposed project.
- Identifies the impacts of the project that would be avoided or lessened by the alternative.
- Assesses whether the alternative would meet most of the basic project objectives.
- Evaluates the comparative merits of the alternative and the project.

According to Section 15126.6(d) of the CEQA Guidelines, “[i]f an alternative would cause...significant effects in addition those that would be caused by the project as proposed, the significant effects of alternative shall be discussed, but in less detail than the significant effects of the project as proposed.”

7.1.2 PROJECT OBJECTIVES

As described in Section 3.3, *Project Objectives*, in Chapter 3, *Project Description*, the following objectives have been established for the proposed project and will aid decision makers in their review of the project, the project alternatives, and associated environmental impacts.

- Support the recovery of Camp and North Complex Fires, which destroyed thousands of structures and displaced residents.
- Address the current and future needs of residents, businesses, employees, and visitors of Butte County.
- Comply with the State regulations, including new laws such as environmental justice and climate adaptation.
- Engage community members as key decision makers for adaptation, community resiliency, public safety, and environmental justice.
- Incorporate the Upper Ridge Community Plan in the General Plan.
- Update the General Plan without significant land use changes.

7.1.3 SIGNIFICANT IMPACT OF THE PROJECT

The following significant and unavoidable impacts are identified in Chapter 5, *Environmental Analysis*, of this Draft EIR:

Agriculture and Forestry Resources

- **AG-1:** The project would convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), to non-agricultural use.

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- **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.

Biological Resources

- **BIO-7:** The proposed project, in combination with past, present, and reasonably foreseeable projects, would result in significant and unavoidable cumulative impacts with respect to biological resources.

Greenhouse Gas Emissions

- **GHG-1:** The General Plan Update and the URCP would generate GHG emissions, either directly or indirectly, that may have a significant effect on the environment.
- **GHG-3:** Implementation of the proposed project would, in combination with past, present, and reasonably foreseeable projects, result in a cumulative impact with respect to GHG emissions.

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.

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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.

7.2 ALTERNATIVES CONSIDERED AND REJECTED DURING THE SCOPING/PROJECT PLANNING PROCESS

Alternatives to the proposed project were evaluated based on their ability to reduce potentially significant impacts of the proposed project and their potential to attain most of the project's objectives. The following is a discussion of the land use alternatives considered during the scoping and planning process and the reasons why they were not selected for detailed analysis in this Draft EIR.

7.2.1 ALTERNATIVE DEVELOPMENT SITE

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. The key question and first step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (CEQA Guidelines Section 15126[5][B][1]). The proposed project is a General Plan Update for Butte County. As the proposed project is specifically for Butte County, an alternative development area would be infeasible and was not analyzed.

7.2.2 NO DEVELOPMENT IN THE VERY HIGH FIRE HAZARD SEVERITY ZONE

The California Department of Forestry and Fire Protection (CAL FIRE) designates lands into responsibility areas based on who is financially responsible for fire protection services. Federal Responsibility Areas (FRA) are fire-prone wildland areas that are owned or managed by a federal agency. State Responsibility Areas (SRA) are lands where CAL FIRE has legal and financial responsibility for wildfire protection and administers fire hazard classifications and building standard regulations. SRAs include forested lands and land that is generally considered wildland. SRAs do not include incorporated cities or federal lands. Local Responsibility Areas (LRAs) include land in cities, cultivated agriculture lands, nonflammable areas in unincorporated areas, and lands that do not meet the criteria for a SRA or FRA.

LRA fire protection is typically provided by city fire departments, fire protection districts, and counties, or by CAL FIRE under contract to local governments. SRAs include unincorporated areas and State lands where the State/CAL FIRE has financial responsibility for wildfire protection. Within the responsibility areas, CAL FIRE designates (with city and county approvals) lands within Fire Hazard Severity Zones (FHSZ). CAL FIRE

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designates lands within SRAs as Moderate, High, and Very High FHSZs; in LRAs, CAL FIRE only designates land within Very High FHSZs.

The responsibility for the prevention and suppression of wildfires in Butte County belongs to the Butte County Fire Department (BCFD), with support from CAL FIRE Butte Unit, US Forest Service (USFS) Plumas National Forest Unit, and Lassen National Forest Unit. The Cities of Chico and Oroville have independent fire departments; BCFD provides fire protection to the unincorporated areas of Butte County, the Cities of Biggs and Gridley, and the Town of Paradise.

The Land Use Diagram (Figure 3-3) designates approximately 400,750 acres (38 percent) of the unincorporated County as being within the Very High FHSZ as defined by the State Fire Marshall. Although the majority of the land within the Very High FHSZ is designated for Timber Mountain and Agriculture, residential land uses are also allowed in these areas. There are 39,045 acres that are designated for development that are also within the Very High FHSZ. Table 7-1, *Buildout of Land in the Very High Fire Hazard Severity Zone*, shows the maximum potential number of housing units and population estimates for developable land within the Very High FHSZ. In total, buildout potential in the Very High FHSZ of unincorporated Butte County is 35,103 housing units which equates to 79,028 residents.

An alternative to limiting exposure of new development to wildfire is to change the General Plan land use designation to only allow for agriculture or timber uses on lands designated as a Very High FHSZ. While some of the housing units might be relocated outside of the Very High FHSZ to other parts of the county, it is unlikely that all of the units could be relocated. Therefore, this alternative assumes none of the potential housing development would be relocated outside of a Very High FHSZ.

The reason for development in these very High FHSZs is to support Butte County's important agricultural industry which would place workers closer to crops and timber. The General Plan already includes policies that discourage new development outside of incorporated cities or identified developed areas, and the zoning code that implements most of the agriculturally designated land allows only one home per parcel with parcel sizes ranging from 20- to 160-acres in size. Similarly, rural residential zones limit density starting at one-acre minimum parcel size increasing to 40-acre minimums in the Foothill Residential and Foothill Country Residential District (FCR). Farmworker housing is permitted in all agricultural zones and would exceed this density on a case-by-case basis.

Prohibiting development in these areas would push workers further away from their job sites, which would increase vehicle miles travelled and could make routine maintenance more difficult because of the long distances involved. The Safety Element includes several policies that require fuel breaks at the edge of developed areas (HS-P12.2), and fire-resistant landscaping (HS-P12.3) as well as close coordination with CAL FIRE, USFS, and regional park districts (HS-A11.5). The General Plan also allows for a transfer of development rights from within the Very High FHSZ and Wildland-Urban Interface to lands outside of these fire-prone areas (HS-A11.7). Development within the Very High FHSZ is required to provide adequate water for fire suppression, meet the current fire-safe ordinance standards, and prepare a Fire Protection Plan (HS-P12.6, and HS-P12.7, HS-P11.5 and HS-P11.6). Furthermore, the County will continue to provide safe and effective evacuation routes for fire prevention and suppression (HS-P13.1, HS-A13.1, HS-A13.2, and HS-A13.3).

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Despite all these policies wildfire will continue to be a high-risk hazard for the county as a whole as personal safety and property is threatened by increased wildfire frequency. The combination of complex terrain, Mediterranean climate, and productive natural plant communities, along with ample natural ignition sources, has created conditions for extensive wildfires in and around Butte County, making wildfire a hazard of high concern. As such, wildfire hazard remains an existing condition and a limiting factor in rural, mountainous, and forested areas. Eliminating the development potential possible within Very High FHSZs would not eliminate the probability of a wildfire, and without local fire suppression improvements, it could make it more difficult to fight wildfires that will continue to occur in the future. Relocating farm and forest workers further from the county’s natural resources would increase the cost of transportation and housing for residents as they will need to compete with the more urban areas for the same housing, and travel farther to reach their job sites. As this alternative would require a major change in land use and would not support or encourage and promote the expansion of agriculture, it is rejected from further consideration in this EIR.

TABLE 7-1 BUILDOUT OF LAND IN THE VERY HIGH FIRE HAZARD SEVERITY ZONE

General Plan Designation	Total Acres	Residential Density	Housing Units	Population ¹
Agriculture	14,242.3			
Industrial	20.5			
Public	7,266.2			
Planned Unit Development	18.1			
Recreation Commercial	2,073.9			
Recreation	128.7			
Right-Of-Way	58.1			
Retail	519.3			
Timber Mountain	337,378.3			
Rural Residential	8,007.7	5*	1,602	3,607
Foothill Residential	29,667.2	1*	29,667	66,790
Very Low Density Residential	882.2	1	882	1,986
Low Density Residential	204.3	3	613	1,380
Medium Density Residential	236.2	6	1,417	3,190
Medium High Density Residential	5.2	14	73	164
Mixed Use	42.4	20	849	1,911
TOTAL	400,750		35,103	79,028

Note: complete buildout of all parcels at their maximum residential density is assumed.

¹ Population is based on the Butte County unincorporated persons/household shown in the 2022 Department of Finance E-5 Population and Housing Estimates.

* The residential of Foothill Residential and Rural Residential designations are shown as acres/dwelling unit. All other residential designations are shown in units/acre.

7.3 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Based on the criteria listed above, the following alternatives have been determined to represent a reasonable range of alternatives that have the potential to feasibly attain most of the basic objectives of the project, but which may avoid or substantially lessen any of the significant effects of the project. These alternatives are analyzed in the following sections:

- No Project Alternative

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An EIR must identify an “environmentally superior” alternative and where the No Project Alternative is identified as environmentally superior, the EIR is then required to identify as environmentally superior an alternative from among the others evaluated. Each alternative’s environmental impacts are compared to the proposed project and determined to be environmentally superior, neutral, or inferior. The preferred land use alternative (proposed project) is analyzed in detail in Chapter 5, *Environmental Analysis*, of this Draft EIR. This chapter provides a comparative analysis, by impact, for each of the alternatives.

7.3.1 NO PROJECT ALTERNATIVE

The No Project Alternative is required to discuss the existing conditions at the time the notice of preparation is published and evaluate what would reasonably be expected to occur in the foreseeable future if the proposed project is not approved (CEQA Guidelines, Section 15126.6[e]). Pursuant to CEQA, this alternative is based on current plans and consistent with available infrastructure and community services. Therefore, the No Project Alternative assumes that the proposed project would not be adopted and development in the Plan Area would occur as intended in the County’s General Plan.

7.3.1.1 AESTHETICS

Under the No Project Alternative, the Plan Area would be developed under the current land use plan of the County’s General Plan. The County’s Municipal Code identifies development standards to ensure quality development in the county. Under this alternative, the Upper Ridge Community Plan would not increase development potential in the Upper Ridge community with 28 parcels redesignated from Retail and Office to Mixed-use land uses in the Old Magalia and Magalia Center neighborhoods. While growth under the No Project Alternative would be subject to existing County policies and regulations pertaining to scenic resources, including the Scenic Highway classifications and policies in the existing General Plan, the proposed project includes goals, policies, and actions that are more comprehensive and detailed than those in the existing General Plan. Impacts to aesthetics would be less than significant and would be the same as the proposed project.

7.3.1.2 AGRICULTURE AND FORESTRY RESOURCES

Under the No Project Alternative, the Plan Area would be developed under the current land use plan of the County’s General Plan. Like the proposed project, the No Project Alternative would allow for conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to nonagricultural use because it applies nonagricultural designations on some farmlands.

In addition, the land use designations under the existing General Plan would allow nonagricultural development on some parcels currently under Williamson Act contract. Although many parcels in the Agriculture Element of the existing General Plan are carried forward into the proposed General Plan 2040, the existing General Plan lacks other new policies and development standards proposed under General Plan 2040 to protect agricultural resources, including retaining and protecting agricultural lands through the use of proactive land use techniques and requiring that a buffer be established on property proposed for residential development to protect lands designated Agriculture. Impacts to agriculture and forestry resources would be significant and unavoidable and would be the same as the proposed project.

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7.3.1.3 AIR QUALITY

While the proposed project includes policies and development of uses that would result in efficiencies related to transportation and adjacency of uses that would generate fewer emissions per person, development intensity under the No Project Alternative would be less than the proposed project. Under this alternative, the Upper Ridge Community Plan would not increase development potential in the Upper Ridge community with 28 parcels redesignated from Retail and Office to Mixed-use land uses in the Old Magalia and Magalia Center neighborhoods. However, under the proposed project, potential future development of up to 851 new dwelling units in the Upper Ridge community could increase the number of residents by 1,915 residents. Therefore, air quality impacts would be reduced compared to the proposed project, which would result in significant and unavoidable impacts. While impacts under this alternative would be less than those of the proposed project, they would likely also be significant and unavoidable.

7.3.1.4 BIOLOGICAL RESOURCES

Under the No Project Alternative, biological resources impacts would be similar to the proposed project. The regulations protecting biological resources in the existing General Plan would be insufficient to mitigate the impacts to biological resources to a less-than-significant level. The proposed project contains a comprehensive set of goals, policies, actions, and regulations that mitigate impacts to biological resources. Future development under this alternative, as with the proposed project, would be required to comply with local, state, and federal regulations to minimize impacts to potential sensitive natural communities. Impacts to biological resources would be significant and unavoidable and would be the same as the proposed project.

7.3.1.5 CULTURAL RESOURCES AND TRIBAL CULTURAL RESOURCES

Impacts under the No Project Alternative would be similar to the proposed project. Future development under this alternative and the proposed project could result in significant and unavoidable impacts to historic resources. Under the No Project Alternative, statutory requirements protecting cultural resources would still be in effect, but General Plan 2040 policies and actions promoting cultural resource preservation and coordination with local tribes would not be adopted. The goals, policies, standards, and actions that pertain to the designation and preservation of archaeological resources as stated in the General Plan EIR would be enforced, which would reduce impacts to less than significant. Additionally, compliance with California Health and Safety Code Section 7050.5(b) would reduce impacts to less than significant in the event that human remains are discovered during construction activities. Impacts under this alternative, as with the proposed project, would be less than significant.

7.3.1.6 ENERGY

Under the No Project Alternative, the Plan Area would be developed under the current land use plan of the County's General Plan. Under this alternative, the Upper Ridge Community Plan would not increase development potential in the Upper Ridge community with 28 parcels redesignated from Retail and Office to Mixed-use land uses in the Old Magalia and Magalia Center neighborhoods. Development intensity under this alternative would be less than the proposed project, and therefore, energy use would be reduced compared to the proposed project. Impacts under this alternative, as with the proposed project, would be less than significant.

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7.3.1.7 GEOLOGY AND SOILS

Under the No Project Alternative, the Plan Area would be developed under the current land use plan of the County's General Plan. Under this alternative, the Upper Ridge Community Plan would not increase development potential in the Upper Ridge community with 28 parcels redesignated from Retail and Office to Mixed-use land uses in the Old Magalia and Magalia Center neighborhoods. Development under the No Project Alternative would be subject to the same local, State, and federal regulations as the proposed project; these regulations, as discussed in Section 5.7, *Geology, Soils, and Seismicity*, as well as mitigation measures, would reduce the potential impacts to a less-than-significant level.

7.3.1.8 GREENHOUSE GAS EMISSIONS

Under the No Project Alternative, the Plan Area would be developed under the current land use plan of the County's General Plan. Under this alternative, the Upper Ridge Community Plan would not increase development potential in the Upper Ridge community with 28 parcels redesignated from Retail and Office to Mixed-use land uses in the Old Magalia and Magalia Center neighborhoods. Development intensity under this alternative would be less than the proposed project, and therefore, energy use would be reduced compared to the proposed project. Impacts under this alternative, as with the proposed project, would be significant and unavoidable.

7.3.1.9 HAZARDS AND HAZARDOUS MATERIALS

Under both the No Project Alternative and the proposed project, new development would be subject to local, State, and federal regulations that would reduce the potential for hazards and hazardous materials impacts. However, the proposed General Plan 2040 contains new goals, policies, and actions to further reduce potentially significant impacts. New development and population growth would result in an increase in demand for emergency services during disasters, which could affect the implementation of emergency response and evacuation plans; therefore, the implementation of mitigation measures would be required to reduce impacts to less than significant. Impacts under this alternative would be similar to the proposed project and would be less than significant with mitigation incorporated.

7.3.1.10 HYDROLOGY AND WATER QUALITY

The No Project Alternative would have similar hydrology and water quality impacts as the proposed project. Future project-specific Water Quality Management Plans would be prepared that would identify best management practices for the future project. Moreover, low-impact development and water quality treatment solutions prescribed in project-specific Water Quality Management Plans would be designed to support or enhance the regional best management practices and efforts implemented by the County. Future projects would be required to comply with federal, State, and local regulations, such as the National Pollutant Discharge Elimination System (NPDES) and Stormwater Pollution Prevention Plan (SWPPP). Although development under the No Project Alternative would be subject to local, State, and federal regulations that help to address hydrology and water quality impacts, the additional policies and actions related to hydrology and water quality in the proposed General Plan Update would not be adopted. Therefore, impacts would be similar and less than significant.

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7.3.1.11 LAND USE AND PLANNING

Under the No Project Alternative, the Plan Area would be developed under the current land use plan of the County's General Plan. The type of land uses allowed would be relatively similar to that which would occur under the proposed General Plan Update. The proposed project would allow for either commercial, residential, or both types of development and offers flexibility to develop housing, if desired, in the Upper Ridge Community Plan. Under this alternative, the Upper Ridge Community Plan would not increase development potential in the Upper Ridge community with 28 parcels redesignated from Retail and Office to Mixed-use land uses in the Old Magalia and Magalia Center neighborhoods.

Although neither the proposed project nor the No Project Alternative would physically divide existing communities within Butte County, the proposed General Plan Update includes new policies that would address impacts related to land use conflicts and that are not included in the existing General Plan. Impacts under this alternative, as with the proposed project, would be less than significant.

7.3.1.12 MINERAL RESOURCES

Under the No Project Alternative, the Plan Area would be developed under the current land use plan of the County's General Plan. Under this alternative, the Upper Ridge Community Plan would not increase development potential in the Upper Ridge community with 28 parcels redesignated from Retail and Office to Mixed-use land uses in the Old Magalia and Magalia Center neighborhoods. Development under the No Project Alternative would be subject to the same local, State, and federal regulations as the proposed project; these regulations, as discussed in Section 5.12, *Mineral Resources*, would reduce the potential impacts to a less-than-significant level.

7.3.1.13 NOISE

Under the No Project Alternative, the Plan Area would be developed under the current land use plan of the County's General Plan. Under this alternative, the Upper Ridge Community Plan would not increase development potential in the Upper Ridge community with 28 parcels redesignated from Retail and Office to Mixed-use land uses in the Old Magalia and Magalia Center neighborhoods. Development intensity under this alternative would be less than the proposed project, and therefore, noise impacts would be reduced compared to the proposed project. Impacts under this alternative, as with the proposed project, would be significant and unavoidable.

7.3.1.14 POPULATION AND HOUSING

The No Project Alternative would not result in an increase in new residents or additional employees to the Plan Area, beyond what is forecasted in the County's General Plan. However, because this alternative would not redesignate 28 parcels from Retail and Office to Mixed-use land uses in the Old Magalia and Magalia Center neighborhoods, it would not create additional employment opportunities or increase housing units in the Plan Area. Like the proposed project, this alternative would not displace housing or people. Under both scenarios, impacts to population and housing would be less than significant. As this alternative would not achieve some of the beneficial effects of the proposed project related to housing and employment,

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such as the increase in jobs and housing units, the impact of this alternative would be greater than the proposed project but would remain less than significant.

7.3.1.15 PUBLIC SERVICES AND RECREATION

Under the No Project Alternative, the Plan Area would be developed under the current land use plan of the County's General Plan. Under this alternative, the Upper Ridge Community Plan would not increase development potential in the Upper Ridge community with 28 parcels redesignated from Retail and Office to Mixed-use land uses in the Old Magalia and Magalia Center neighborhoods. This alternative would result in a lesser increase in population and employment, compared to the proposed project. Furthermore, the No Project Alternative would not include new General Plan Update policies and actions that address public services and recreation. Impacts to public services, including fire, police, school, library, and parks and recreational services would be less than the proposed project and would remain less than significant.

7.3.1.16 TRANSPORTATION

Under the No Project Alternative, the Plan Area would be developed under the current land use plan of the County's General Plan. Under this alternative, the Upper Ridge Community Plan would not increase development potential in the Upper Ridge community with 28 parcels redesignated from Retail and Office to Mixed-use land uses in the Old Magalia and Magalia Center neighborhoods. However, under the proposed project, potential future development of up to 851 new dwelling units in the Upper Ridge community could increase the number of residents by 1,915, thereby potentially increasing vehicle miles traveled (VMT). Since the proposed project does not propose any development projects or land use changes, with the exception of the Upper Ridge Community Plan, VMT in Butte County is expected to remain largely consistent with the previous modeling and growth assumptions of the Climate Action Plan (CAP). However, the modeled VMT per capita under the proposed project exceeds that of the Butte County Association of Governments (BCAG) Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) in 2040. To lower the County's projected VMT and implement the strategies listed in the CAP and RTP/SCS, the proposed project includes goals, policies, and actions that aim to reduce VMT. Additionally, as stated in the proposed project, the CAP, RTP/SCS, and the Governor's Office of Planning and Research (OPR) technical advisory, a mix of uses generally leads to decreased VMT; therefore, mixed-use development of the Old Magalia parcels is likely to result in a reduction of VMT. The No Project Alternative would not include new General Plan Update policies and actions that address transportation, which includes policies that aim to ensure that VMT from future development is reduced. Impacts under this alternative, as with the proposed project, would be less than significant.

7.3.1.17 UTILITIES AND SERVICE SYSTEMS

Under the No Project Alternative, the Plan Area would be developed under the current land use plan of the County's General Plan. Under this alternative, the Upper Ridge Community Plan would not increase development potential in the Upper Ridge community with 28 parcels redesignated from Retail and Office to Mixed-use land uses in the Old Magalia and Magalia Center neighborhoods. However, under the proposed project, potential future development of up to 851 new dwelling units in the Upper Ridge community could increase the number of residents by 1,915. This alternative would result in a lesser increase in population and employment, compared to the proposed project. Therefore, impacts to the City's

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infrastructure systems would be reduced under the No Project Alternative and impacts would remain less than significant.

7.3.1.18 WILDFIRE

Under the No Project Alternative, the Plan Area would be developed under the current land use plan of the County's General Plan. Under this Alternative, the Upper Ridge Community Plan would not increase development potential in the Upper Ridge community with 28 parcels redesignated from Retail and Office to Mixed-use land uses in the Old Magalia and Magalia Center neighborhoods. However, under the proposed project, potential future development could include an increase in population, buildings, and infrastructure on the Upper Ridge, which is in State Responsibility Area, Very High and High Fire Hazard Severity Zones, the wildland-urban interface, and includes areas that have historically burned from wildfires. The Upper Ridge is heavily forested and experiences hot, dry easterly winds and therefore development could exacerbate wildfire risks. This alternative would result in a lesser increase in population and employment, compared to the proposed project. Therefore, wildfire impacts would be reduced under the No Project Alternative but impacts would remain significant and unavoidable.

7.3.1.19 CONCLUSION

Impacts of the No Project Alternative would be similar for aesthetics, agriculture and forestry resources, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, and transportation. Impacts to aesthetics, air quality, energy, greenhouse gas emissions, noise, public services and recreation, utilities and service systems, and wildfire would be less than the proposed project. Impacts to population and housing would be greater than the proposed project. The No Project Alternative would generally meet the project objectives, but to a lesser extent. The 28 parcels in the Upper Ridge Community Plan identified for redesignation from Retail and Office to Mixed-use land uses in the Old Magalia and Magalia Center neighborhoods would not be implemented under this alternative.

7.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires a lead agency to identify the "environmentally superior alternative" to the proposed project. Because the No Project Alternative would result in an overall reduction in the level of impacts identified for the proposed project, the No Project Alternative has been identified as "environmentally superior" to the proposed project. However, in cases where the "No Project Alternative" is environmentally superior to the proposed project, the environmentally superior development alternative must be identified.